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Ronald B. Turovsky
Direct Dial: (310) 312-4249
Internet: rturovsky@manatt.com

December 12, 1995

By Overnight Delivery

Donald L. Averett
Senior Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION
DEC 13 8 10 AM '95

95030102478

Re: I.D. Number C00282038; Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Averett:

This letter is in response to a letter stamped November 28, 1995, to Kenneth S. Williams, treasurer of Sony Pictures Entertainment Political Action Committee (the "Committee"), from the Federal Election Commission ("FEC"), signed by you.

Enclosed please find a copy of a written redesignation submitted to Citizens for Harkin on behalf of Sony Pictures Entertainment.

Enclosed also is the Committee's amended mid-year report reflecting that redesignation. Please note that the only changes in the report are the redesignation from primary to general, the name of the recipient (Citizens for Harkin rather than Americans for Harkin), and the address of Citizens for Harkin. We have also checked off the box showing that the Committee now is a multi-candidate committee.

Thank you for your cooperation. Please feel free to contact me with any questions or comments.

Very truly yours,

Ronald B. Turovsky

Ronald B. Turovsky
Manatt, Phelps & Phillips

RBT:pesl
Enclosures
cc: Kenneth S. Williams, Treasurer, Sony Pictures Entertainment Political Action Committee
Theresa Kehoe, Treasurer, Citizens for Harkin

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Dec 13 8 19 AM '95

Ronald B. Turovsky
Direct Dial: (310) 312-4249
Internet: rturovsky@manatt.com

December 12, 1995

Theresa Kehoe
Treasurer
Citizens for Harkin
1901 Belle Avenue
Suite 9
Des Moines, Iowa 50315

Re: Contributions to Citizens to Harkin and Americans for Harkin — Redesignation

Dear Ms. Kehoe:

We represent Sony Pictures Entertainment, Inc., Political Action Committee (the "Committee"). On or about February 10, 1994, a contribution was made by the Committee to "Citizens for Harkin" in the amount of $1,000. On or about May 1, 1995, a contribution was made by the Committee to "Americans for Harkin" in the amount of $1,000. I understand from my conversations with Krista Pilot, Senator Harkin's Deputy Finance Director, on December 5, 1995, and December 11, 1995, that "Citizens for Harkin" is a committee formed in connection with Senator Harkin's Senate race, and that "Americans for Harkin" is a committee formed in connection with Senator Harkin's Presidential race in 1992. I also understand from my conversation with Ms. Pilot that both contributions from the Committee were mistakenly deposited in Senator Harkin's 1996 primary election account because it was assumed by your office that the Committee was a multicandidate committee and could contribute more than $1,000 per election.

This letter constitutes a written redesignation pursuant to 11 CFR § 110.1(b). We hereby formally notify you, on behalf of the Committee, that $1,000 is to be redesignated from Senator Harkin's 1996 primary election account to Senator Harkin's 1996 general election account immediately.

A copy of this letter is being forwarded to the Federal Election Commission ("FEC"). Likewise, a letter will be sent to the FEC stating that the Committee has redesignated $1,000 to Senator Harkin's general election account. The Committee will be filing appropriate reports and amendments reflecting this redesignation.

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Please feel free to contact me with any questions or comments.

Very truly yours,

Ronald B. Turovsky

Ronald B. Turovsky
Manatt, Phelps & Phillips

RBT:peal
cc: Kenneth S. Williams
✓Donald L. Averett, Senior Reports Analyst, Federal Election Commission

95030102450

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION

DEC 13 8 19 AM '95

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Sony Pictures Entertainment, Inc.
Political Action Committee

ADDRESS (number and street) ☐ Check if different than previously reported
10202 W. Washington Boulevard

CITY, STATE and ZIP CODE
Culver City, CA 90232

2. FEC IDENTIFICATION NUMBER
C00282038

3. ☒ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☒ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 01/01/95 through 06/30/95		
6. (a) Cash on Hand January 1, 19 95		$ 3,400.00
(b) Cash on Hand at Beginning of Reporting Period	$ 3,400.00	
(c) Total Receipts (from Line 19)	$ 65,022.54	$ 65,022.54
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 68,422.54	$ 68,422.54
7. Total Disbursements (from Line 30)	$ 14,300.00	$ 14,300.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 54,122.54	$ 54,122.54
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$ -0-	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-219-3420

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer
Kenneth S. Williams

Signature of Treasurer

Date 12/12/95

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)

9503010241

DETAILED SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS
PAGE 2, FEC FORM 3X

(revised 1/1/91)

NAME OF COMMITTEE SONY PICTURES ENTERTAINMENT, INC. POLITICAL ACTION COMMITTEE

REPORT COVERING PERIOD FROM 01/01/95 TO: 06/30/95

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year	
11. Contributions (other than loans) From:			
a. Individual/Persons Other Than Political Committees			
i. Itemized (use Schedule A)	$65, 022.54	$65,022.54	11(a)(i)
ii. Unitemized			11(a)(ii)
iii. Total (add i and ii) ➤	$65,022 .54	$65,022.54	11(a)(iii)
b. Political Party Committees			11(b)
c. Other Political Committees (such as PACs)			11(c)
d. Total Contributions (add a iii, b and c) ➤	$65,022.54	$65,022.54	11(d)
12. Transfers From Affiliated/Other Party Committees			12
13. All Loans Received			13
14. Loan Repayments Received			14
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)			15
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees			16
17. Other Federal Receipts (Dividends, Interest, etc.)			17
18. Transfers from Nonfederal Account for Joint Activity			18
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) ➤	$65,022.54	$65,022.54	19
20. Total Federal Receipts (subtract line 18 from line 19) ➤	$65,022.54	$65,022.54	20
II. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4)			
i. Federal Share			21(a)(i)
ii. Non-Federal Share			21(a)(ii)
b. Other Federal Operating Expenditures			21(b)
c. Total Operating Expenditures (add a i, a ii, and b) ➤			21(c)
22. Transfers to Affiliated/Other Party Committees			22
23. Contributions to Federal Candidates/Committees and Other Political Committees	$14,300.00	$14,300.00	23
24. Independent Expenditures (use Schedule E)			24
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)			25
26. Loan Repayments Made			26
27. Loans Made			27
28. Refunds of Contributions To:			
a. Individuals/Persons Other Than Political Committees			28(a)
b. Political Party Committees			28(b)
c. Other Political Committees (such as PACs)			28(c)
d. Total Contribution Refunds (add a, b and c) ➤			28(d)
29. Other Disbursements			29
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) ➤	$14,300.00	$14,300.00	30
31 Total Federal Disbursements (subtract line 21 a ii from line 30) ➤	$14,300.00	$14,300.00	31
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans)(from line 11d)	$65,022.54	$65,022.54	32
33. Total Contribution Refunds (from line 28d)	-0-	-0-	33
34. Net Contributions (other than loans)(subtract line 33 from 32)	$65,022.54	$65,022.54	34
35. Total Federal Operating Expenditures (add 21 a i and 21 b) ➤	-0-	-0-	35
36. Offsets to Operating Expenditures (from line 15)	-0-	-0-	36
37. Net Operating Expenditures (subtract line 36 from 35) ➤	-0-	-0-	37

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
SONY PICTURES ENTERTAINMENT, INC. POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
GEPHARDT IN CONGRESS COMMITTEE 74235 Watson Road St. Louis, MO 63119	Richard Giphardt Congress: MO, 3rd Dist. Disbursement for: [x] Primary [ ] General [ ] Other (specify)	4/25/95	$1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CITIZENS FOR HARKIN 426 C Street, N.E. Rear Building Washington, D.C. 20002	Tom Harkin Senate: Iowa Disbursement for: [ ] Primary [x] General [ ] Other (specify)	5/1/95	$1,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
HYDE FOR CONGRESS COMMITTEE 465 Dominion Court #606 Wood Dale, IL 60191	Henry J. Hyde Congress: IL, 6th Dist. Disbursement for: [x] Primary [ ] General [ ] Other (specify)	5/1/95	$1000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CONGRESSMAN BART GORDON COMMITTEE P.O. Box 2008 Murfreesboro, TN 37133	Bart Gordon Congress: TN, 6th Dist. Disbursement for: [x] Primary [ ] General [ ] Other (specify)	5/1/95	$500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
FRIENDS FOR CLIFF STEARNS P.O. Box 308 Silver Springs, FL 32688	Cliff Stearns Congress: FL, 6th Dist. Disbursement for: [x] Primary [ ] General [ ] Other (specify)	4/27/95	$500.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
FRIENDS OF MIKE DEWINE P.O. Box 340188 Columbus, OH 43234	Mike DeWine Senate: Ohio Disbursement for: [ ] Primary [x] General [ ] Other (specify)	4/27/95	$1,000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
FRIENDS OF ED TOWNS 360 Clinton Avenue, #6R Brooklyn, NY 11238	Ed Towns Congress: NY, 10th Dist. Disbursement for: [x] Primary [ ] General [ ] Other (specify)	4/27/95	$300.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
FRIENDS OF LARRY PRESSLER P.O. Box 77166 Washington, D.C. 20013	Larry Pressler Senate: South Dakota Disbursement for: [x] Primary [ ] General [ ] Other (specify)	3/27/95	$1,000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
FRIENDS FOR FIELDS P.O. Box 2406 Humble, TX 77347	Jack Fields Congress: TX, 8th Dist. Disbursement for: [x] Primary [ ] General [ ] Other (specify)	3/27/95	$1,000.00

SUBTOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) .....

4-00173

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Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☑	Hand Delivered	DATE OF RECEIPT 12-13-95
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☐	Postmark Illegible	
☐	Received from the House Office of Records and Registration	DATE OF RECEIPT
☐	Received from the Senate Office of Public Records	DATE OF RECEIPT
☐	Other (Specify):	POSTMARKED and/or DATE OF RECEIPT

HB.
PREPARER

12-13-95
DATE PREPARED

FEC FORM 70-2 (12/92)

9 5 0 3 0 1 0 2 4 5 4