



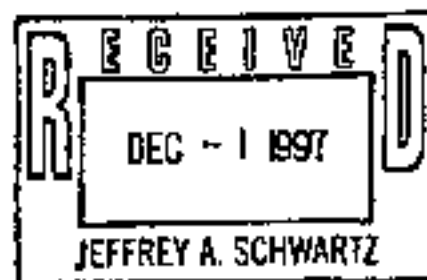
FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM

Dec 5 9 21 AM '97  
RQ-3

November 26, 1997

Jeffrey A. Schwartz, Treasurer  
Walt Disney Productions Employees PAC  
(Disney Employees Political Action Committee)  
500 South Buena Vista Street  
Burbank, CA 91521



Identification Number: C00197749

Reference: April Monthly Report (3/1/97-3/31/97)

Dear Mr. Schwartz:

This letter is to inform you that as of November 25, 1997, the Commission has not received your response to our request for additional information, dated November 5, 1997. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Edward Ryan on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

NOV 5 1997

Jeffrey A. Schwartz, Treasurer  
Walt Disney Productions Employees PAC  
(Disney Employees Political Action Committee)  
500 S. Buena Vista Street  
Burbank, CA 91521

Identification Number: C00197749

Reference: April Monthly Report (3/1/97-3/31/97)

Dear Mr. Schwartz:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A

supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

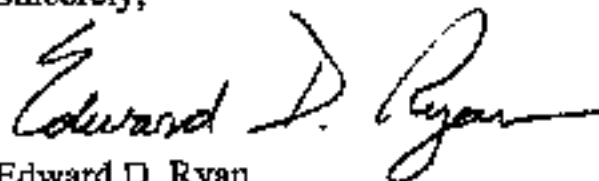
Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule B of your report discloses a \$1,582.96 payment to your connected organization for McCollum for Congress (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Edward D. Ryan  
Reports Analyst  
Reports Analysis Division



The **WALT DISNEY** Company

November 14, 1997

Mr. Edward D. Ryan, Reports Analyst  
Federal Election Commission  
Washington, D.C. 20463

RE: Committee Number C00197749

Dear Mr. Ryan:

I am writing in response to your letter dated November 5, 1997. This letter will memorialize our conversation of November 12, 1997 regarding the matters in said letter.

1. Relative to the two contributions to the Tom Daschle campaign committee (12/23/96 and 3/11/97), please see the enclosed reimbursement for overage associated with the 1998 primary election.

2. Relative to the 3/27/97 contribution to The Walt Disney Company as reimbursement for a Bill McCollum for Congress reception, please be advised that this reimbursement was coterminous with the event and thus represented no corporate contribution.

Thank you for your assistance with this matter. If you require further assistance, please contact me at (818) 560-1719.

Sincerely,

A handwritten signature in black ink that reads "Jeff Schwartz". The signature is written in a cursive, somewhat stylized font.

Jeffrey A. Schwartz  
Director, Corporate Affairs

enclosures



**CERTIFIED MAIL**  
**F 408 820 592**

October 19, 1997

Public Records Office  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Sir/Madam:

Enclosed please find FEC Form 3X which is due on October 20, 1997 for the period 9/1/97 - 9/30/97.

Please do not hesitate to contact me at (818) 560-1719 if you have any questions on this matter.

Sincerely,

A handwritten signature in cursive script that reads "Jeffrey A. Schwartz". The signature is written in dark ink and includes a stylized flourish at the end.

Jeffrey A. Schwartz  
Treasurer

Enclosure

EA

ITEMIZED RECEIPTS

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

NAME OF COMMITTEE (in Full)

*The Walt Disney Company Employees' Political Action Committee*

A. Full Name, Mailing Address and Zip Code <i>Bank of America Toluca Lake Branch 4123 W. Olive Street Burbank, CA 91505</i>	Name of Employer <i>The Walt Disney Company</i>  Occupation <i>Interest Income</i>	Date (month, day, year)	Amount of Each Receipt this Period  \$ -
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date $\triangleright$ \$ <i>534</i>		
B. Full Name, Mailing Address and Zip Code <i>A lot of People Supporting Tom Daschle P.O. Box 1656 Sioux Falls, SD 57101</i>  <small>(See schedule E, line 21, report of to-omit contribution made March 11, 1997)</small>	Name of Employer <i>The Walt Disney Company</i>  Occupation	Date (month, day, year)	Amount of Each Receipt this Period  \$ <i>3,939.81</i>
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date $\triangleright$ \$ <i>3,939.81</i>		
C. Full Name, Mailing Address and Zip Code	Name of Employer  Occupation	Date (month, day, year)	Amount of Each Receipt this Period  \$ -
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date $\triangleright$ \$ -		
D. Full Name, Mailing Address and Zip Code	Name of Employer  Occupation	Date (month, day, year)	Amount of Each Receipt this Period  \$ -
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date $\triangleright$ \$ -		
E. Full Name, Mailing Address and Zip Code	Name of Employer  Occupation	Date (month, day, year)	Amount of Each Receipt this Period  \$ -
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date $\triangleright$ \$ -		
F. Full Name, Mailing Address and Zip Code	Name of Employer  Occupation	Date (month, day, year)	Amount of Each Receipt this Period  \$ -
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date $\triangleright$ \$ -		
G. Full Name, Mailing Address and Zip Code	Name of Employer  Occupation	Date (month, day, year)	Amount of Each Receipt this Period  \$ -
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date $\triangleright$ \$ -		
SUBTOTAL of Receipts This Page (optional) .....			
TOTAL This Period (last page this line number only) .....			\$ <i>3,939.81</i>

# SCHEDULE B ITEMIZED DISBURSEMENTS

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  
merchandise purposes, other than using the name and address of any political committee to solicit contributions from such contributors.

NAME OF COMMITTEE (In Full)  
**The Walt Disney Company Employees' Political Action Committee**

A. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
Dick Durbin for Senate 2403 Rayburn Building Washington D.C., 20515	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/17/97	\$ 1,000.00
The Walt Disney Company 300 S. Buena Vista Burbank, CA 91521	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/27/97	\$ 1,582.96 (In Kind)
Valentino Restaurant 3115 Pico Blvd. Santa Monica, CA 90405	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/11/97	\$ 3,939.81 (In Kind)
D. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	\$ 6,522.77

# SCHEDULE B ITEMIZED DISBURSEMENTS

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 mercel purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)  
*The Walt Disney Company Employees' Political Action Committee*

A. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
<i>Dick Durbin for Senate 2469 Rayburn Building Washington D.C., 20515</i>	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>3/17/97</i>	<i>\$ 1,000.00</i>
<i>The Walt Disney Company 500 S. Buena Vista Burbank, CA 91521</i>	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>3/27/97</i>	<i>\$ 1,582.96 (in Kind)</i>
<i>Valentino Restaurant 3115 Pico Blvd. Santa Monica, CA 90405</i>	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>3/11/97</i>	<i>\$ 3,939.81 (in Kind)</i>
<i>D. Full Name, Mailing Address and Zip Code</i>	<i>Purpose of Disbursement</i>	<i>Date (month, day, year)</i>	<i>Amount of Each Receipt this Period</i>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
<i>E. Full Name, Mailing Address and Zip Code</i>	<i>Purpose of Disbursement</i>	<i>Date (month, day, year)</i>	<i>Amount of Each Receipt this Period</i>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
<i>F. Full Name, Mailing Address and Zip Code</i>	<i>Purpose of Disbursement</i>	<i>Date (month, day, year)</i>	<i>Amount of Each Receipt this Period</i>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
<i>G. Full Name, Mailing Address and Zip Code</i>	<i>Purpose of Disbursement</i>	<i>Date (month, day, year)</i>	<i>Amount of Each Receipt this Period</i>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
<i>H. Full Name, Mailing Address and Zip Code</i>	<i>Purpose of Disbursement</i>	<i>Date (month, day, year)</i>	<i>Amount of Each Receipt this Period</i>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
<i>I. Full Name, Mailing Address and Zip Code</i>	<i>Purpose of Disbursement</i>	<i>Date (month, day, year)</i>	<i>Amount of Each Receipt this Period</i>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	<i>\$ 6,522.77</i>



# SCHEDULE B ITEMIZED DISBURSEMENTS

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 special purposes, other than using the name and address of any political committee to solicit contributions from such committees.

NAME OF COMMITTEE (in Full)  
*The Walt Disney Company Employees' Political Action Committee*

A. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
<i>Rogan Campaign Committee P.O. Box 36 Monroeville, CA 91021</i>	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ 5,000.00
<i>Bill McCollum for Congress 1850 Lee Road, Suite 236 Winter Park, FL 32789</i>	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ 3,417.04
<i>Dosselle for Senate 243 2nd St NE, Suite 300 Washington D.C., 20002</i>	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ <del>5,000.00</del> 5,000.00
<i>Friends of Connie Mack 1311 N. Westshoer Blvd., Suite 313 Tampa, FL 33607</i>	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ 5,000.00
<i>Bar Nighthorse Campbell Committee 360 Russell Bldg Washington, D.C., 20510</i>	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ 5,000.00
<i>Bill McCollum for Congress 1850 Lee Road, Suite 236 Winter Park, FL 32789</i>	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ 1,582.96
<i>[Empty]</i>	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Receipt this Period \$ -
<i>[Empty]</i>	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Receipt this Period
<i>[Empty]</i>	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Receipt this Period
TOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$ 25,000.00

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.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>12-5-97</i>
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other ( Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>JS</i> PREPARER	<i>12-5-97</i> DATE PREPARED