

ETEXT ATTACHMENT

[BEGIN TEXT]

November 22, 2002

11/22/2002 13:48

Mr. Edward D. Ryan
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Walt Disney Company Employees' PAC
FEC ID No. C00197749

Dear Mr. Ryan:

This is in response to your letter dated November 1, 2000 concerning the September Monthly Report (8/1/02-8/31/02) of the above-referenced Committee.

You ask about a disbursement from the Committee to the Committee's connected organization. The Committee paid its connected organization for catering that benefitted a federal candidate in order to prevent an illegal in-kind contribution by the connected organization. Please be aware that the catering services were provided by a catering division of the Walt Disney Company. Since the Committee paid the catering costs, the disbursement was reported as an in-kind contribution from the Committee to the candidate's campaign.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Judith L. Corley
Counsel to Walt Disney Company Employees PAC
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