



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

FEB 25 1998

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: Year End Report (12/1/97-12/31/97)

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 discloses a \$1,671.84 payment to your connected organization for a Reception for Friends of Clay Shaw (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.

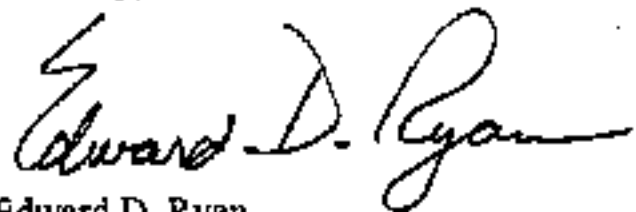
-The total listed on Line 16, Column B of the Detailed Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B

total. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule B supporting Line 23 discloses contributions to federal candidates for which no election designation has been provided. Please note that if no designation is included in your report, the contributions will be attributed to the next upcoming election for the recipient candidate. Thus, for future reporting purposes, it is in your committee's interest to designate the appropriate election in order to avoid the appearance of excessive contributions made to federal candidates by your committee.

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,

A handwritten signature in cursive script that reads "Edward D. Ryan". The signature is written in dark ink and is positioned above the typed name.

Edward D. Ryan
Reports Analyst
Reports Analysis Division

SCHEDULE B ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be 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 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>Walt Disney World P.O. Box 10000 Lake Buena Vista, FL 32830-1000 Attn: Michael Paredes</i>	<i>Reception - Friends of Clay Shaw</i> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/16/97	\$ 1,671.84 <i>ETD</i>
<i>Friends of Sony Bono PO Box 3007 Palo Alto, CA 92263</i>	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/16/97	\$ 500.00
<i>Charles Canaday for Congress Committee PO Box 6158 Lakeland, FL 33807</i>	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/16/97	\$ 1,000.00
<i>GoodLate for Congress PO Box 292 Roanoke, VA 24002</i>	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/16/97	\$ 1,000.00
<i>Lochs for Congress PO Box 5063 Bay Shore, NY 11706</i>	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/16/97	\$ 500.00
<i>Peare for Congress Committee PO Box 16021 Alexandria, VA 22302</i>	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/16/97	\$ 500.00
<i>Henry J. Hyde for Congress Committee PO Box 332 Deer Plains, IL 60116</i>	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/16/97	\$ 1,000.00
<i>Hatch Election Committee 9115 Westerkholer Blvd Pleasant, VA 22182</i>	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/16/97	\$ 1,000.00
<i>Friends of Barbara Boxer PO Box 641751 Los Angeles, CA 90056</i>	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/8/97	\$ 5,000.00

SUBTOTAL of Disbursements This Page (optional)	\$ <i>✓</i> 12,171.84
TOTAL This Period (last page this line number only)	

