



The *Walt Disney* Company

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

NOV 21 12 28 PM '97

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,

Jeffrey A. Schwartz
Director, Corporate Affairs

enclosures



CERTIFIED MAIL
P 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

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 17

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 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 <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 \$ 5.34	
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 B, line 15; refer to in-kind contributions 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 \$ 3,939.81
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date \$ 3,939.81	
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 \$ -	
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 \$ -	
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 \$ -	
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 \$ -	
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 \$ -	
SUBTOTAL of Receipts This Page (continued)			
TOTAL This Period (last page this line number only)			\$ 3,939.81

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 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>Dick Durbin for Senate 2463 Rayburn Building Washington D.C., 20515</i>	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/17/97	\$ 1,000.00
<i>The Walt Disney Company 500 S. Buena Vista Burbank, CA 91521</i>	Purpose of Disbursement: <i>Reception - McCollum for Congress</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/27/97	\$ 1,582.96 <i>802</i> (In Kind)
<i>Valentino Restaurant 3115 Pico Blvd. Santa Monica, CA 90405</i>	Purpose of Disbursement: <i>Reception - Datchle for Senate</i> 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
E. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
H. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period
I. Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Receipt this Period

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

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

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 commercial 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 <i>Dick Durbin for Senate 2463 Rayburn Building Washington D.C., 20315</i>	Purpose of Disbursement	Date (month, day, year) 3/17/97	Amount of Each Receipt this Period \$ 1,600.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

B. Full Name, Mailing Address and Zip Code <i>The Walt Disney Company 500 S. Buena Vista Burbank, CA 91521</i>	Purpose of Disbursement <i>Reception - McCollum for Congress</i>	Date (month, day, year) 3/27/97	Amount of Each Receipt this Period \$ 1,552.96 (In Kind)
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

C. Full Name, Mailing Address and Zip Code <i>Valentino Restaurants 3115 Pico Blvd. Santa Monica, CA 90405</i>	Purpose of Disbursement <i>Reception - Daschle for Senate</i>	Date (month, day, year) 3/11/97	Amount of Each Receipt this Period \$ 3,939.81 (In Kind)
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

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

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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
Rogan Campaign Committee P.O. Box 36 Monterey, CA 91021	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ 5,000.00
B. Full Name, Mailing Address and Zip Code Bill McCollum for Congress 1850 Lee Road, Suite 236 Winter Park, FL 32789	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ 3,417.04
C. Full Name, Mailing Address and Zip Code Daschle for Senate 245 2nd St NE, Suite 300 Washington D.C., 20002	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ <i>500</i> 5,000.00
D. Full Name, Mailing Address and Zip Code Friends of Connie Black 1311 N. Westshore Blvd., Suite 313 Tampa, FL 33607	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ 5,000.00
E. Full Name, Mailing Address and Zip Code Ben Nighthorse Campbell Committee 380 Russell Bldg Washington, D.C., 20510	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ 5,000.00
F. Full Name, Mailing Address and Zip Code Bill McCollum for Congress 1850 Lee Road, Suite 236 Winter Park, FL 32789	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12/23/96	\$ 1,581.96
G. Full Name, Mailing Address and Zip Code	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 \$ -
H. Full Name, Mailing Address and Zip Code	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. Full Name, Mailing Address and Zip Code	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

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$ 25,000.00



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

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 type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED 11-17-97
<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>SKS</i> PREPARER	11-24-97 DATE PREPARED