



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 26, 2005

Sandra Yartin Depoy, Treasurer
American Resort Development Association Resort
Owners Coalition PAC (ARDA-ROC PAC)
1201 15th Street NW, Suite 400
Washington, DC 20005

Response Due Date:
February 25, 2005

Identification Number: C00358663

Reference: Amended April Quarterly Report (1/1/04-3/31/04), received 12/2/04

Dear Ms. Depoy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

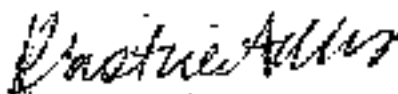
-Schedule A supporting Line 11(a)(i) of your report discloses a receipt(s) totaling \$752,150.54 from "unitemized contributions" as a MEMO entry. Further, the memo text of your report indicates: "The unitemized contributions reflect individual contributions of \$3.00. No contribution exceeds that amount." Please be advised, the amount of a MEMO entry is not included in the total receipts or disbursements for the report. Further, contributions from individuals/persons that aggregate \$200 or less should be disclosed on Line 11(a)(ii) of the Detailed Summary Page. Please amend your report to disclose the amount of these apparent unitemized contributions totaling \$752,150.54 as a non-MEMO entry on Line 11(a)(ii) of the Detailed Summary Page. This proper method of reporting should be used in order to avoid inflating the cash-on-hand amount.

-On Schedule B supporting Line 29 of the Detailed Summary Page, your committee discloses disbursements for "administrative service fees" and lists itself (American Resort Development Association Resort Owners Coalition PAC (ARDA-ROC PAC)) as the payee. Please clarify the nature of this transaction or amend Schedule B to provide the correct name and mailing address of the payee.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1141.

Sincerely,



Kristine Adams

Campaign Finance Analyst
Reports Analysis Division

