



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 29, 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:
May 31, 2005

Identification Number: C00358663

Reference: Year End Report (11/23/04-12/31/04)

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:

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): "salaries, administrative, expenses" and "expenses." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-On Schedule B supporting Line 23 of the Detailed Summary Page, your committee discloses disbursements for "salaries, administrative, expenses" 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.

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a committee from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year.

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If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

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.

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

-Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. Operating expenditures should be properly disclosed on a separate Schedule(s) B, supporting Line(s) 21(b) of the Detailed Summary Page. Other disbursements, including contributions to non-federal candidates and committees should be properly disclosed on a separate Schedule(s) B, supporting Line(s) 29 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

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

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AMERICAN RESORT DEVELOPMENT ASSOCIATION RESORT OWNERS COALITION
PAC (ARDA-ROC PAC)

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Excessive Contribution(s) to a Committee(s):

Recipient Name	Date	Amount	Report
Distilled Spirits Council	12/22/04	\$10,000.00	2004 Year End

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