



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 15, 2006

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

Response Due Date:
October 16, 2006

Identification Number: C00358663

Reference: July Quarterly Report (4/1/06-6/30/06)

Dear Ms. De Poy:

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 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 multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

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

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

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Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation 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 supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2006 Primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation 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)

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Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

Please note, 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) 694-1153.

Sincerely,

Kristin DeCarmine

Kristin DeCarmine
Campaign Finance Analyst
Reports Analysis Division

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Contributions after Election Date:

Recipient Name	Date	Amount	Election	Election State - Date
Thomas Campbell	6/28/06	\$5,000	P2006	CA - 6/06/06
Richard Pombo	6/28/06	\$5,000	P2006	CA - 6/06/06
Jerry Weller	6/28/06	\$2,500	P2006	IL - 3/21/06
Geoff Davis for Congress	6/28/06	\$2,000	P2006	KY - 5/16/06
Tom Allen for Congress Committee	6/28/06	\$2,500	P2006	ME - 6/13/06
Kent Conrad	6/28/06	\$2,500	P2006	ND - 6/13/06
Robert Menendez	6/28/06	\$5,000	P2006	NJ - 6/06/06
Heather Wilson	6/28/06	\$2,500	P2006	NM - 6/06/06
William Shuster	6/28/06	\$5,000	P2006	PA - 5/16/06
Gresham Barrett	6/28/06	\$2,500	P2006	SC - 6/13/06
Tim Johnson	6/28/06	\$2,000	P2006	SD - 6/06/06

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Excessive Contribution to Candidate Committees:

Recipient Name	Date	Amount	Election	Report
Benjamin Nelson	6/30/05	\$2,500	G2006	2005 Mid Year
Benjamin Nelson	6/28/06	\$3,000.00	G2006	2006 July Quarterly
Robert Menedez	6/30/05	\$1,000	P2006	2006 Mid Year
Robert Menedez	6/28/06	\$5,000	P2006	2006 July Quarterly
Jack Reed	9/29/05	\$5,000	P2006	2005 Year End
Jack Reed	6/28/06	\$3,000	P2006	2006 July Quarterly
Christopher Chocola	11/15/05	\$5,000	P2006	2005 Year End
Christopher Chocola	4/05/06	\$650	P2006	2006 July Quarterly
Christopher Chocola	4/05/06	\$4,350	P2006	2006 July Quarterly
Gresham Barrett	10/18/06	\$2,500	P2006	2005 Year End
Gresham Barrett	11/15/06	\$2,500	P2006	2005 Year End
Gresham Barrett	6/28/06	\$2,500	P2006	2006 July Quarterly
Bill Shuster	11/15/05	\$5,000	P2006	2005 Year End
Bill Shuster	6/28/06	\$5,000	P2006	2006 July Quarterly
Heather Wilson	11/15/05	\$5,000	P2006	2005 Year End
Heather Wilson	6/28/06	\$2,500	P2006	2006 July Quarterly
Jerry Weller	9/29/05	\$5,000	P2006	2005 Year End
Jerry Weller	6/28/06	\$2,500	P2006	2006 July Quarterly
Richard Pombo	11/15/05	\$5,000	P2006	2005 Year End
Richard Pombo	6/28/06	\$5,000	P2006	2006 July Quarterly

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