



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 3, 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:
March 7, 2005

Identification Number: C00358663

Reference: Amended October Quarterly Report (7/1/04-9/30/04), received 11/4/04

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:

-The beginning cash balance of this report should equal the ending balance of your 2004 Amended July Quarterly Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Your report discloses additional disbursements totaling \$660,616.31 on Line(s) 21(a)(ii) and 23 of the Detailed Summary Page that were not disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report.

-Please amend Schedule B supporting Line 23 by providing the address for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Non-federal contributions should be properly disclosed on a separate Schedule B, supporting Line 29 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

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-Line 21(a) of the Detailed Summary Page should only be used to report the federal and non-federal shares of allocable activities. If your committee has only one account, the total federal operating expenditures (administrative expenses) should be reported on Line 21(b). Please amend your report to confirm the nature of your expenditures and to provide the total on the appropriate line.

-Schedule H4 of your report discloses activity which is 100% non-federal. For future reporting, please be advised that any activity which is financed entirely by the federal account (including administrative expenses), should be reported on Schedule B supporting Line 21(b). 11 CFR §§106.6 and 106.7

-Please amend your report by providing the address and purpose for each disbursement itemized on Schedule(s) H4 supporting Line(s) 21(a).

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "administrative," "expenses," "event" and "retainer." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, your committee discloses disbursements for "non-federal" 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 your report 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.

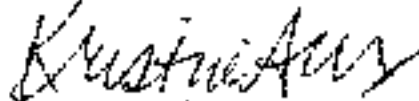
Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any

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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,

A handwritten signature in black ink, appearing to read "Kristine Adams", written over a horizontal line.

Kristine Adams
Campaign Finance Analyst
Reports Analysis Division

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