



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 12, 2008

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:
September 12, 2008

Identification Number: C00358663

Reference: May Monthly Report (4/1/08-4/30/08)

Dear Treasurer:

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. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 items:

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

Page 2

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.

2. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B supporting Line(s) 21(b) of your report to clarify the following description(s): "Administrative Service Fee/Overhead." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

3. Please clarify all expenditures made for "Retainer for Fundraising Consulting" and "Retainer/Fees for Fundraising Consulting" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. 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. **Requests for extensions of time in which to respond will not be considered.**

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.

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

Page 3

Sincerely,

Kristin DeCarmine

Kristin DeCarmine

Senior Campaign Finance Analyst

Reports Analysis Division

223

28039812612

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

Page 4

Recipient Name	Date	Amount	Election	Report
Andre Carson for Congress	03/04/2008	\$5,000	P-2008	2008 April Monthly
Andre Carson for Congress	04/29/2008	\$5,000	P-2008	2008 May Monthly

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