



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

August 17, 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:  
September 16, 2005**

Identification Number: C00358663

Reference: Mid-Year Report (1/1/05 – 6/30/05)

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:

-Line 17 of the Detailed Summary Page discloses receipts for dividends and interest during the reporting period. Please clarify whether this figure includes any receipts from a single source, that aggregate greater than \$200 in the calendar year. If this is the case, please amend your report(s) by itemizing the receipts on Schedule A, 2 U.S.C. §434(b)(2)(J)

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B supporting Line(s) 23 of your report to clarify the following description(s): "Intercompany Balance," "Intercompany Expenses," and "intercompany transfer." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule B of your report discloses a reimbursement(s) to an individual(s) for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by committee staff that make up the reimbursement may have to be itemized. For

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example, if the related payment(s) to any one vendor by the staff aggregates in excess of \$200 for the calendar year, the payment(s) must be itemized as a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and an adequate purpose. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must clarify this in an amendment to this report. Please amend your report to include the missing or clarifying information. 11 CFR §104.9 and Advisory Opinion 1996-20, footnote 3

-Please clarify all expenditures made for "expenses for legislative luncheon," "fundraising expense," and "Inaugural event" 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

-Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. Other federal operating expenditures should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Transfers to affiliated committees should be properly disclosed on a separate Schedule B, supporting Line 22 of the Detailed Summary Page. Other disbursements, such as contributions to non-federal organizations, should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorizations 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.

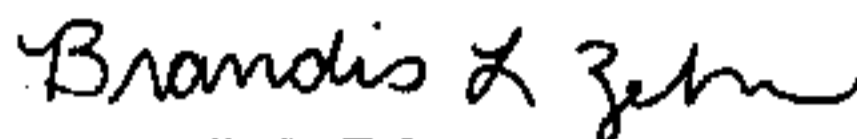
Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please

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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) 694-1148.

Sincerely,



Brandis L. Zehr  
Campaign Finance Analyst  
Reports Analysis Division

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