

RQ-2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 29, 2004

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:  
October 29, 2004

Identification Number: C00358663

Reference: Amended April Quarterly Report (1/1/04-3/31/04), received 5/19/04

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 Year End Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Schedule A supporting Line 11(a)(i) of your report discloses an apparent receipt from "unitemized contributions" as a memo entry. Please be advised, a memo entry is used to disclose additional information about an itemized transaction and the amount of a memo entry is not included in the total receipts or disbursements for the report. Further, federal regulations require the itemization of all contributions from individuals/persons that aggregate greater than \$200 in the calendar year. Contributions from individuals/persons that aggregate \$200 or less need only be disclosed on Line 11(a)(ii) of the Detailed Summary Page.

Please amend your report to clarify the nature of this transaction, including whether it includes any receipts that aggregate greater than \$200 from an individual/person in the calendar year. If this is the case, please amend your report by itemizing the receipts on Schedule A according to 11 CFR §104.3(a)(2).

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2004 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)

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.

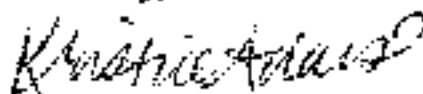
-Please amend your report by providing the address and purpose for each disbursement itemized on Schedule B supporting Line(s) 29.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Operating expenditures 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 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

Contributions(s) After Election Date:

| Recipient Name                 | Date    | Amount     | Election | Election State - Date |
|--------------------------------|---------|------------|----------|-----------------------|
| JERRY WELLER FOR CONGRESS INC. | 3/30/04 | \$1,000.00 | Primary  | IL-3/16/04            |
| MAX SANDLIN FOR CONGRESS       | 3/30/04 | \$1,000.00 | Primary  | TX-3/9/04             |
| NANCY PELOSI FOR CONGRESS      | 3/30/04 | \$2,500.00 | Primary  | CA-3/2/04             |

