



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

Sandra Yartin Depoy, Treasurer
American Resort Development Association Resort
Owners Coalition PAC (ARDA-ROC PAC)
1220 L Street NW
Washington, DC 20005

AUG 21 2002

Identification Number: C00358663

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Ms. Depoy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11(a)(ii) of the Detailed Summary Page discloses \$362,340.25 in unitemized receipts from individuals/persons other than political committees 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 supporting Line 11(a)(i). 2 U.S.C. §434(b)(2)(A) and (3)(A)

-Schedule B of your report (pertinent portion(s) 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 committee from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year.

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

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the

excessive amount must be made within sixty (60) days of receipt of the contribution.

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

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund will be taken into consideration.

-Schedule B of your report discloses a \$54,999.00 payment to your connected organization for "fee" (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jane Parks
Reports Analyst
Reports Analysis Division

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

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☐ 29				

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)

American Resort Development Association Resort Owners' Coalition Political Action Commit

Full Name (Last, First, Middle Initial)

A. Blue Dog Coalition PAC

Mailing Address

227 Massachusetts Avenue, NW 101

City

Washington

State

DC

Zip Code

20005

Purpose of Disbursement

Leadership PAC

Candidate Name

Category/
Type

Office Sought:

House

Senate

President

Disbursement For:

2002

Primary

General

X Other (specify) ▼

State:

District:

Date of Disbursement

05 / 15 / 2002

Amount of Each Disbursement this Period

5000.00

Transaction ID: SB23.4150

Full Name (Last, First, Middle Initial)

B. BYRON L. DORGAN

Mailing Address

1001 EAST CENTRAL AVE APT 176

City

SISMARCK

State

ND

Zip Code

58501

Purpose of Disbursement

Candidate Name

Category/
Type

Office Sought:

House

X Senate

President

Disbursement For:

2002

Primary

X General

Other (specify) ▼

State: ND

District: ND

Date of Disbursement

06 / 28 / 2002

Amount of Each Disbursement this Period

1000.00

Transaction ID: SB23.4156

Full Name (Last, First, Middle Initial)

C. HARRY REID

Mailing Address

116 PRINCETON STREET

City

LAS VEGAS

State

NV

Zip Code

89107

Purpose of Disbursement

Candidate Name

Category/
Type

Office Sought:

House

X Senate

President

Disbursement For:

2002

Primary

X General

Other (specify) ▼

State: NV

District: 03

Date of Disbursement

06 / 28 / 2002

Amount of Each Disbursement this Period

2000.00

Transaction ID: SB23.4154

SUBTOTAL of Disbursements This Page (optional)

8000.00

TOTAL This Period (last page this line number only)

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

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 (check only one)

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NAME OF COMMITTEE (in Full)

American Resort Development Association Resort Owner's Coalition PAC

Full Name (Last, First, Middle Initial)

A. BLUE DOG POLITICAL ACTION COMMITTEE

Mailing Address

PO BOX 7588

City

WASHINGTON

State

DC

Zip Code

20044

Purpose of Disbursement

pacto pac

Candidate Name

BLUE DOG POLITICAL ACTION COMMITTEE

Category/
Type

Office Sought

House

Senate

President

Disbursement For:

Primary

General

Other (specify) ▼

State:

District:

Date of Disbursement

02 / 14 / 2002

Amount of Each Disbursement this Period

5000.00

Transaction ID: SB23.4105

Full Name (Last, First, Middle Initial)

B. DCCC NON-FEDERAL ACCOUNT #1

Mailing Address

430 s. Capitol Street, SE

City

Washington

State

DC

Zip Code

20002

Purpose of Disbursement

Candidate Name

Category/
Type

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other (specify) ▼

State:

District:

Date of Disbursement

02 / 28 / 2002

Amount of Each Disbursement this Period

15000.00

Transaction ID: SB23.4117

Full Name (Last, First, Middle Initial)

C. DCCC NON-FEDERAL PAC

Mailing Address

430 s. Capitol Street, SE

City

Washington

State

DC

Zip Code

20003

Purpose of Disbursement

Candidate Name

Category/
Type

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other (specify) ▼

State:

District:

Date of Disbursement

02 / 28 / 2002

Amount of Each Disbursement this Period

15000.00

Transaction ID: SB23.4123

SUBTOTAL of Disbursements This Page (optional)

35000.00

TOTAL This Period (last page this line number only)

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use appropriate checkbox(es)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

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NAME OF COMMITTEE (in Full)

American Resort Development Association Resort Owners' Coalition Political Action Committee

Full Name (Last, First, Middle Initial)

A. American Resort Development Assoc.

Date of Disbursement

M M / D D / Y Y
04 / 29 / 2002

Mailing Address

1201 15th Street NW

Suite 400

City

Washington

State

DC

Zip Code

20005

Amount of Each Disbursement this Period

54999.00

Purpose of Disbursement

Fee

Candidate Name

Category/
Type

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other (specify) ▼

State:

District:

Transaction ID: SB21B.4141

Full Name (Last, First, Middle Initial)

B. US Dept of Treasury

Date of Disbursement

M M / D D / Y Y
04 / 28 / 2002

Mailing Address

P.O. Box 105578

City

Atlanta

State

GA

Zip Code

30348

Amount of Each Disbursement this Period

2773.00

Purpose of Disbursement

Fee

Candidate Name

Category/
Type

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other (specify) ▼

State:

District:

Transaction ID: SB21B.4139

C.

SUBTOTAL of Disbursements This Page (optional) ▶

57772.00

TOTAL This Period (last page this line number only) ▶

57772.00

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