

RQ-2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 19, 2004

Sandra Yartin Depoy, Treasurer
American Resort Development Association
Resort Owners Coalition PAC (ARDA-ROC PAC)
1201 15th Street NW
Washington, DC 20005

Response Due Date:
June 18, 2004

Identification Number: C00358663

Reference: Year End Report (7/1/03-12/31/03)

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:

-Schedule B of your report discloses a transfer(s) totaling \$42,014.43 to what appears to be a non-federal account of your committee. Please be advised that committees that make disbursements in connection with federal and non-federal elections and have established separate federal and non-federal accounts, must allocate their expenses pursuant to 11 CFR §§106.6 and 106.7. Please provide further clarification regarding this transfer(s). The Commission recommends that you take steps to correct any non-compliance, and that you establish procedures to ensure future compliance with the allocation regulations.

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

-The totals listed on Lines 6(c), 7, 11(d), 19, 20, 23, 29, 31, 32, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Line 28(c) of the Detailed Summary Page of your report discloses a total of \$176,060.63 in refunds of contributions to other committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$132,202.34. Please amend your report to clarify the discrepancy.

-Schedule B supporting Line 28(c) discloses refunds made to numerous committees; however, it appears that the receipt of these contributions has not been reported by your committee. Please provide the original date of receipt of the contribution. In addition, you must amend the report covering the period during which the contribution was received to disclose the receipt on Schedule A supporting the appropriate line of the Detailed Summary Page. 11 CFR §103.3(b)(1)

-Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. Operating expenditures should be properly disclosed on a separate Schedule(s) B, supporting Line(s) 21b 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 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1141.

Sincerely,

Kristine Adams
Campaign Finance Analyst
Reports Analysis Division

2024-03-28 14:00:00