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## VIA MESSENGER

November 22, 2010

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Lynn M. Fraser  
Director of Alternative Dispute Resolution Office  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: ADR 549

Dear Ms. Fraser:

The Federal Election Commission ("Commission") Report Analysis Division ("RAD") referred the American Resort Development Association Resort Owners Coalition PAC ("ARDAROC-PAC") for failing to disclose a disbursement on a 2009, 30-day post special report, filed on December 3, 2009. On May 10, 2010, the Committee filed an amended 30-day post special report to include an additional single disbursement that was omitted from the post special election report of December 3, 2009.

As a result of a clerical error, an additional expense - a single disbursement - was inadvertently omitted from the original report. This expenditure was not included with the list of other disbursements that were entered into the database used to generate the ARDAROC-PACs FEC reports. An amendment was prepared and filed immediately upon the discovery that the expenditure was omitted. It is important to note that the omission is of a single expenditure, not a series of expenditures. Moreover, the expenditure was not made to support or oppose any federal candidate or committee or in connection with any other federal election activity. The omission of the expenditure was discovered through an internal review of ARDAROC-PAC's activities, and the correction was made immediately once the mistake was discovered. The correction was not made at the Commission's direction or after a request for additional information from RAD.

ARDA-ROC and ARDA-ROC PAC have fiscal years which end at the close of September. As part of the process of preparing year-end reports, a preliminary year-end/disbursement check registrar was created. This was provided with the

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Committee's bank statements to the PAC's compliance/reporting vendor, DDC Advocacy. A fiscal year-end transfer between the Committee and ARDA-ROC was made for the Committee's portion of shared PAC and connected organization expenses. This was not a payment required by the Act and was unrelated in anyway to federal election activities. Although the dollar amount of the omitted transfer was not diminus, its actual significance is trivial. The public policy reasons underlining the Act's disclosure requirements are unaffected by this failure to initially disclose what was materially only an internal transfer.

Attached to this letter are proposed new accounting and reporting procedures which will ensure that this type of error will not be repeated in the future. The Committee will immediately implement these new procedures and any other measures which your office or the Commission believe are warranted.

Thank you for your assistance in this matter.

Sincerely,



E. Mark Braden

Enclosure