



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEB 22 2011
SECRET

2011 FEB 22 P 3:46

SENSITIVE

MEMORANDUM

February 22, 2011

TO: The Commission

THROUGH: Alec Palmer *AP*
Acting Staff Director

FROM: Patricia Carmona *PC for PC*
Chief Compliance Officer

Lynn M. Fraser *L*
Director, ADR Office

SUBJECT: ADR 549 American Resort Development Association Resort Owners Coalition PAC and the Committee's Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop an in-house training program for Committee staff; set up a process to conduct monthly reconciliations of all financial transactions; and pay a civil penalty of \$1,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 549 (RAD 10L-10). The ADR Office received this referral on October 20, 2010.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred American Resort Development Association Resort Owners Coalition PAC and the Committee's Treasurer (Respondents or the Committee) for failing to disclose all disbursements on their 2009 30 Day Post-Special Report, filed December 3, 2009. On May 10, 2010, the Committee filed an Amended 30 Day Post-Special Report which disclosed additional disbursements of \$119,791.06.

Respondents acknowledge an unintentional omission of one internal transfer. Respondents contend that the omission arose in part from its compliance vendor's error. Respondents further contend that as soon as the error was discovered, an amended report was filed to correct the record.

Recommendation to Approve
Settlement Agreement
ADR 549 (RAD 10L-10)
Page 1

11190291323