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July 7, 1999

Federal Election Commission
Office of the General Counsel
999 E Street, N.W.
Washington, DC 20463
Attn: Michael Marinelli

Supplement to \$\frac{1}{2}\$

Re: American Resort Development Association, Resort Owner Coalition

Dear Mr. Marinelli:

I am writing pursuant to our telephone conversation of this day. The American Resort Development Association, Resort Owner Coalition ("ARDA-ROC") is not a separate incorporated entity from the American Resort Development Association ("ARDA"). ARDA ROC was created by ARDA to be part of the association. ARDA has created a separate bank account for ARDA-ROC activities. All funds received by ARDA for ARDA-ROC are deposited into the ARDA-ROC bank account.

If you should have any additional questions, please do not hesitate to contact me. Thank you for your cooperation in this matter.

Sincerely,

Mark Braden

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EMB:m