



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1499

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles M. Kerr, Treasurer
Citizens for Sarbanes
1800 Mercantile Bank and Trust Building
2 Hopkins Plaza
Baltimore, Maryland 21201

RE: MUR 1499
Citizens for Sarbanes

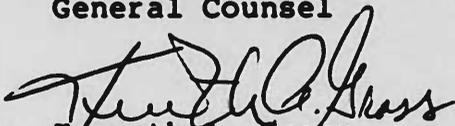
Dear Mr. Kerr:

On October 29, 1982, the Commission notified you of a complaint alleging that your Committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 9, 1983, determined that on the basis of the information in the complaint, and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

cc: Honorable Paul S. Sarbanes

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lawrence J. Hogan
Hogan for Senate
Post Office Box 545
Seabrook, Maryland 20706

RE: MUR 1499
Citizens for Sarbanes

Dear Mr. Hogan:

The Federal Election Commission has reviewed the allegations of your complaint dated October 25, 1982, and determined that on the basis of the information provided in your complaint, and information provided by the Respondent, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended, ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

cc: Honorable Paul S. Sarbanes

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Citizens for Sarbanes) MUR 1499

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 9, 1983, the Commission decided by a vote of 4-0 to take the following actions in MUR 1499:

1. Find no reason to believe that Citizens for Sarbanes violated 2 U.S.C. § 441e(a).
2. Close the file.
3. Send the letters as attached to the General Counsel's Report signed March 3, 1983.

Commissioners Elliott, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioners Aikens and Harris did not cast a vote.

Attest:

3/9/83

Date

Jody C. Ransom

for Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

3-4-83, 3:49
3-7-83, 11:00

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FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel
 DATE: March 4, 1983
 SUBJECT: MUR 1499 - GC Rpt

The attached is submitted as an Agenda document
 for the Commission Meeting of _____
 Open Session _____
 Closed Session _____

CIRCULATIONS

48 Hour Tally Vote
 Sensitive
 Non-Sensitive
 24 Hour No Objection
 Sensitive
 Non-Sensitive
 Information
 Sensitive
 Non-Sensitive
 Other

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of
Citizens for Sarbanes

)
)
)

MUR 1499

83 MAR 4 P 3: 49

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 26, 1982, the Commission received a formal complaint from Lawrence J. Hogan alleging that Senator Paul S. Sarbanes (hereinafter "the Senator") and Citizens for Sarbanes (hereinafter "the Committee") violated 2 U.S.C. § 441e "...by unlawfully soliciting and receiving political contributions from foreign nationals."

The Citizens for Sarbanes was established in 1981 as the principal campaign committee of Paul S. Sarbanes, the junior United States Senator from Maryland.

II. FACTUAL AND LEGAL ANALYSIS

The complaint alleges that on September 9, 1981, the Committee sponsored a reception for the Senator in Toronto, Ontario, Canada, that according to the complaint was undoubtedly a fundraiser. The complaint further alleges that it is probable that the campaign contributions raised at that event were from foreign nationals. See Attachment I. The complaint states: "[I]t has been the practice of this Committee to term fundraisers as 'receptions'; however, the complainant has provided no additional evidence to support his statement.

The Committee's 1981 Year End Report reveals that on September 9, 1981, a \$1,268.90 disbursement was made to the

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C.P. Hotel Royal in Canada for a reception. See Attachment II. Because the disbursement is substantial, it appears that the Committee may have sponsored a reception for political purposes; i.e., to solicit funds for a political campaign from foreign nationals.

On December 9, 1982, this Office communicated with the Committee's counsel, who informed us that an answer refuting the allegations in the complaint would be provided no later than December 15, 1982.

On January 17, 1983, the Committee formally responded to the allegations in the complaint. According to the Committee, the Senator was in Toronto, Canada, for the express purpose of attending and addressing the "...59th Supreme Convention of the Order of AHEPA (American Hellenic Educational Progressive Association), 1/ which was held in Toronto August 8-15, 1981."

The Senator is an AHEPA member and was invited to address the Convention on August 13, 1981; his travel expenses were paid by AHEPA.

Although the Senator's trip was not intended to serve a political function, he did "...wish to have an opportunity to discuss his Maryland Senate campaign with those American Ahepans who had an interest in the matter. A reception was therefore

1/ Formed in 1922, AHEPA is an organization of Greek immigrants to North America, and their descendents, the purpose of which is to assist Americans and Canadians of Greek descent to preserve their Hellenic heritage.

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held by the Committee for that purpose on August 12, 1981, at the Royal York Hotel in Toronto. Since this was a Sarbanes Committee function, the cost of the reception was paid by the Committee." See Attachment I.

On January 24, 1983, this Office contacted the Committee treasurer concerning his January 13th written response to the allegation presented in the complaint. The discussion focused on the discrepancy ^{2/} in total contributions received from the eighteen (18) individual contributors, and the possible prohibited funds received by the Committee.

The Committee further responded to these inquiries by letter dated January 26, 1983. In this letter, the Committee explained

"...that two of the contributions...were made in Canadian currency, i.e., ten Canadian dollars from each of these contributors. When deposited by the Sarbanes Committee in its account, the Canadian currency was deposited in its United States currency equivalent at the then-prevailing rate of exchange as \$8.06 U.S. for each contributor as indicated on each of the receipts. Thus, these two contributions had a total value of \$16.12 U.S., and account for the difference between the \$1,230 figure you calculated and \$1,226.12 figure I reported in my January 13 letter."

The Committee further states that no prohibited funds were received from the individuals who attended the August 12th reception. See Attachments II and III. As a result of this

^{2/} This Office calculated the total receipts at \$1,230.00; the Committee reported a figure of \$1,226.12.

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reception, the Committee received contributions totaling \$1,226.12 from the following eighteen (18) individuals:

JOHN BEKRAKIS	\$	50.00	
ANDREAS A. BOYADJIS		100.00	
T. P. DIONISOS		100.00	
NICHOLAS D. MATSAKIS, D.D.S.		25.00	
ASPASIA M. MITCHELL		100.00	
HELEN PAPPAS		50.00	
STEVEN N. PAPPAYLIOU		60.00	
LEON SPANOS		200.00	
LILLIAN CARO		100.00	
MARY CARAS		25.00	
C. L. CHIPOKAS		25.00	
GEORGE L. ZANETAKOS		100.00	
JOHN KALFAS		25.00	
STEPHEN S. SCOPAS		100.00	
P. FRANTEO		100.00	
NICHOLAS VITOS		50.00	(cash)
OLGA BANCROFT		8.06	(cash) ^{3/}
MR. & MRS. BERNARD HELIS		8.06	(cash) ^{3/}
		<u>\$1,226.12</u>	

All the above-named individual contributors provided residential addresses located within the continental United States. See Attachment I.

2 U.S.C. § 441e(a) states, in part, that

[I]t shall be unlawful for a foreign national directly or through any other person to make any contribution of money or other thing of value, or to promise expressly or impliedly to make any such contribution, in connection with an election to any political office...or for any person to solicit, accept, or receive any such contribution from a foreign national.

Based on the above statement of facts and the evidence provided, there is no reason to believe that the Committee

^{3/} These individual cash contributions were converted from \$10.00 Canadian currency to \$8.06 United States currency.

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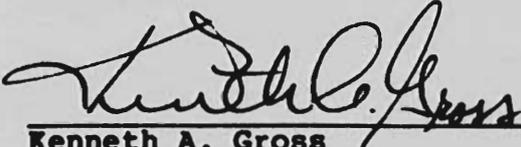
received political contributions from foreign nationals in connection with its Senatorial campaign, and therefore is not in violation of 2 U.S.C. § 441e(a).

III. RECOMMENDATIONS

1. Find no reason to believe that Citizens for Sarbanes violated 2 U.S.C. § 441e(a).
2. Close the file.
3. Send attached letters.

Charles N. Steele
General Counsel

March 3, 1983
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Attachments I - III
 2. Proposed letters (2)
- 30 total pages attached

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VENABLE, BAETJER AND HOWARD
ATTORNEYS AT LAW
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1800 MERCANTILE BANK & TRUST BUILDING

EDMUND P. SANDRIDGE, JR.
ARTHUR W. MAHLEN, JR., P.C.
ROBERT M. THOMAS, P.C.
A. DANIEL COON, P.C.
ROBERT S. SAIS, P.C.
JACQUES T. SCHMIDT, P.C.
CHARLES S. REEVES, JR.
WILLIAM J. MCARTHY, P.C.
RUSSELL S. REYNOLDS, JR., P.C.
THOMAS D. PERKINS, III, P.C.
BENJAMIN S. SWILETT, P.C.
GERALD H. SAYS, P.C.
LURE HARBURY
STUART H. ROSE, P.C.
C. VAN LEUVEN STEWART, P.C.
LAWRENCE S. WESCOTT, P.C.
GEORGE S. SOUL, JR.
JOHN HENRY LEWIN, JR., P.C.
ALAN S. BORDEN
NEAL S. BORDEN
ROBERT A. SHELTON
JACOB L. FRIEDEL
HARRY D. SHAPIRO
STANLEY MASAROFF
LEE H. MILLER
FRANCIS THOMAS COLEMAN, JR.
THOMAS J. BENNETT, JR.
N. PETER LARGAU
DOUGLAS D. CONNOR, JR.
HARVEY S. CLAPP, III
BENJAMIN ROSENBERG
ROBERT S. SMITH
JAMES D. WRIGHT
ALEXANDER I. LEWIS, III

MAR STUL OPPENHEIMER
TERRY F. HALL
CRAIG E. SMITH
THOMAS S. MARTIN
BYRON L. COON
CHARLES H. HERR
BENSON E. LESS
ROBERT S. ANES
NELL S. STRACHAN
RICHARD L. WASSERMAN

COUNSEL
JOHN HENRY LEWIN
HOWARD S. BORDEN
RICHARD W. SHURT
WILBUR E. SHIMONS, JR.
ALTYER EMERTUS
JOSEPH FRANCE

RICHARD H. VENABLE (1888-1910)
EDWIN S. BAETJER (1888-1948)
CHARLES HENRY HOWARD (1870-1942)

2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201
(301) 244-7400

WASHINGTON, D. C. OFFICE
VENABLE, BAETJER, HOWARD & CIVILETTI
SUITE 704
1301 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D. C. 20004
(202) 783-4300

*ADMITTED IN DISTRICT OF COLUMBIA -
NOT ADMITTED IN MARYLAND

WRITER'S DIRECT NUMBER IS
244-7544

January 13, 1983

LAWRENCE J. MERRIN
JOHN W. BENEFLIN
BARBARA A. SCHLAPP
FREDRIC A. PRESS
RONALD D. SHIFF
JAMES R. ARCHIBALD
CONSTANCE H. BAKER
G. STEWART WEBB, JR.
GEORGE W. JOHNSTON
F. DUDLEY STAPLES, JR.
EDMUND L. WENGER
DAVID H. FLEISHMAN
GEORGE H. RETHOLDS, III
JANA HOWARD
MARGARET LEE QUINN
MITCHELL ROLAN
JEAN E. KILPATRICK
SARA F. ENTABEL
VICKI L. MARSHING
STEPHEN L. OWEN
PETER R. PARVIS
WILLIAM H. FITZPATRICK, JR.
JEFFREY R. AYRES
KENNETH R. HOFFMAN
BRIGID E. BENNEY
PHYLLIS COLE FRIEDMAN
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ABBE DAVID LOWELL
BRUCE R. SPECTOR
ELLEN S. WALKER
JOHN H. MORRIS, JR.
CARL L. METHERY
LESLIE A. VIAL
MAURICE BASRIN

M. LUCINDA MOTERO
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ROBERT A. RAPP
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DAVID S. ABRAMOFF
JACK L. HARVEY
CAROL E. GREENFELD
JOAN FISHER FELDMAN
CHARITY BOETT
PETER S. SAUBER
ELLYN L. BROWN
CHRISTOPHER R. BELLOTT
CYNTHIA ANN BOBB
CHARLES J. BABY
CHRISTOPHER J. PRITZ
PETER E. REITH
MARIAHNE SCHMITZ HELLAUER
W. ROBERT SHERRIN
KATHLEEN MORRIS HOOVER
CYNTHIA NEVENS MANN
YARROW S. REUBENBERG
MITCHELL W. SHAPIRO
JOHN S. WATKINS, III
ELIZABETH R. HUGHES
JAMES A. SUGGERT
RONALD W. TAYLOR
STEPHEN F. BIGGEE
ALAN S. SCHLER
PAUL S. SHELTON
WILLIAM T. FITZGERALD, JR.
STEPHEN R. GARNETT
FRANCIS R. LIND

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Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1499

Dear Mr. Gross:

This letter is written in response to your letter of October 29, 1982, advising me, as treasurer of Citizens for Sarbanes (the "Sarbanes Committee"), of the above-referenced Complaint, and is intended to serve as the Sarbanes Committee's response.

The Complaint, filed by Senator Sarbanes' Republican opponent, Lawrence J. Hogan, just before the Maryland general election, appears to be nothing more than malicious speculation on Mr. Hogan's part that the Sarbanes Committee received "illegal donations from foreigners" at a reception held in Toronto, Canada, over a year prior to Mr. Hogan's Complaint, in August, 1981. The simple and complete response to Mr. Hogan's insinuations is that, so far as the Sarbanes Committee is aware, no campaign contributions have been made to it by any foreign national, as that term is defined by 11 CFR § 110.4(a), directly or through any other person, at any time, or as the result of any fundraising event.

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Attachment I

Kenneth A. Gross, Esq.
January 13, 1983
Page Two

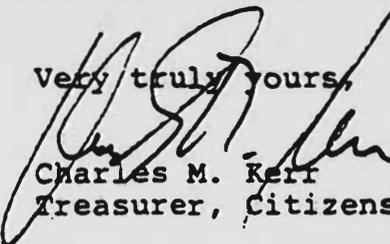
Turning specifically to the 1981 reception in Toronto, that reception was held in conjunction with the 59th Supreme Convention of the Order of AHEPA (American Hellenic Educational Progressive Association), which was held in Toronto August 8-15, 1981. Formed in 1922, AHEPA is an organization of Greek immigrants to North America, and their descendents, the purpose of which is to assist Americans and Canadians of Greek descent to preserve their Hellenic heritage. Senator Sarbanes is an Ahepan, and he was invited by AHEPA to address the Convention in Toronto on Thursday, August 13, 1981, at the Convention Grand Banquet. An article on the Convention which appeared in the AHEPAN in its Fall, 1981, issue, is enclosed for your reference as Exhibit A.

Since Senator Sarbanes attended the convention to address his fellow Ahepans and their families, and his trip was not, nor was it intended to be, a campaign function of the Sarbanes Committee, the Senator's travel expenses were paid by AHEPA. The Senator did, however, wish to have an opportunity to discuss his Maryland Senate campaign with those American Ahepans who had an interest in the matter. A reception was therefore held by the Committee for that purpose on August 12, 1981, at the Royal York Hotel in Toronto. Since this was a Sarbanes Committee function, the cost of the reception was paid by the Committee. Attached as Exhibit B are the Committee's records in that regard.

The reception was not, nor was it intended to be, a fund-raising event for the Committee. A total of 18 contributions were received, however, at the Reception or shortly thereafter, having a total value of \$1,226.12. All of these contributors have addresses in the United States. For your reference, enclosed, as Exhibit C, please find copies of the checks received from these contributors, and, with regard to the three contributors who made cash contributions, copies of our receipts for their contributions are enclosed.

Please let me know, at the address and telephone number set forth above on the letterhead, if our Committee can provide any further information you require in considering this Complaint.

Very truly yours,


Charles M. Kerr
Treasurer, Citizens for Sarbanes

Enclosure
CMK:rmc

Attachment I / p 2

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AHEPAN

MARKUAS, PETER H
7 EAST LAKE AVE
BALTIMORE MD
03-204-101973-01

3 0 4 0 3 4 6 1 8 1 2 9



Supreme President Gustav Coffinas
The First 40 Days



Attachment
I p. 3

AHEPA Convention Exceeds Expectations

In spite of an American air controllers strike and sympathy slow-downs from Canadian air controllers, over 8,000 Ahepans traveled to Toronto, Canada, for the 59th Supreme Convention from August 8-15. Highlights of the convention week included reaching the \$1,000,000 fund drive goal for the new AHEPA Hall for Boys at St. Basil's Academy, and the unanimous election of the new AHEPA Supreme Lodge, headed by prominent Brooklyn attorney Gustav Coffinas.

The convention officers elected Monday were: Philip Frangos, of Lansing, MI, Convention Chairman; John Cholakis, Albany, NY, Convention Vice-Chairman; and Lambros Svingos, Huntington, WV, Convention Secretary.

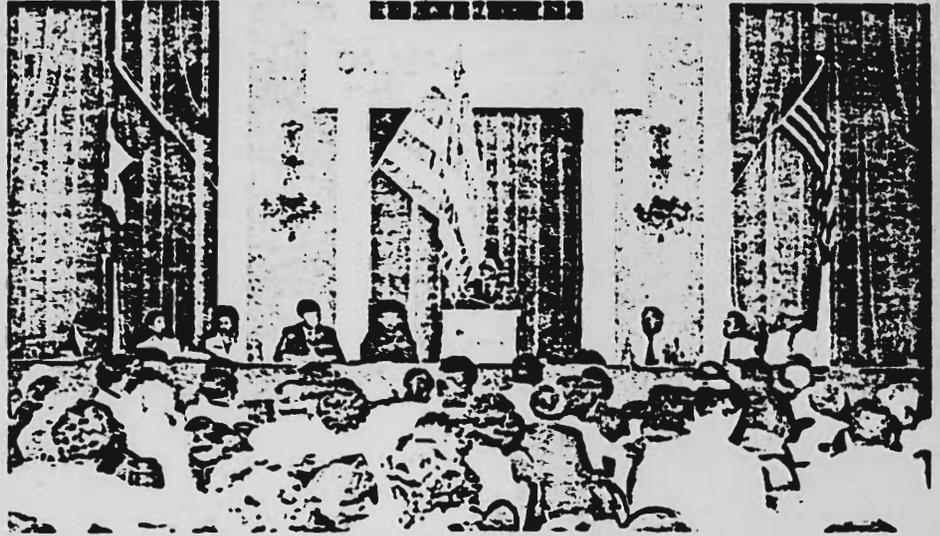
The social events were well-attended, and a full athletic program was conducted. The Daughters Fashion Show was stunning, and over 1,000 women viewed the dynamic designs of Zoe, a Toronto fashion designer.

During an AHEPA Hall for Boys luncheon on August 11 over \$80,000 was pledged toward the establishment of a Hall for Boys maintenance fund. The fund will be used for future repairs and upkeep on the three new dormitories that will be completed by this October. Louis G. Manesiotis, the fund drive chairman, has said that, "erecting these buildings has truly been AHEPA's finest hour."

On Thursday, August 13, the Grand Banquet heard speeches from the Right Honorable Joseph Clark, head of the Progressive Conservative Party of Canada; U.S. Senator Paul Sarbanes; His Eminence, Archbishop Iakovos; and Supreme President Nick Smyrnis, among others.

The last convention business session began on Friday morning and ended at 5 a.m. Saturday morning with the unanimous election of the new Supreme Lodge.

Elected were: Gus Coffinas, Brooklyn, NY, Supreme President; Peter Kouchalakos, Coral Gables, FL, Supreme Vice-President; James S. Anas, Burlington, Ontario, Canada, Supreme Vice President of



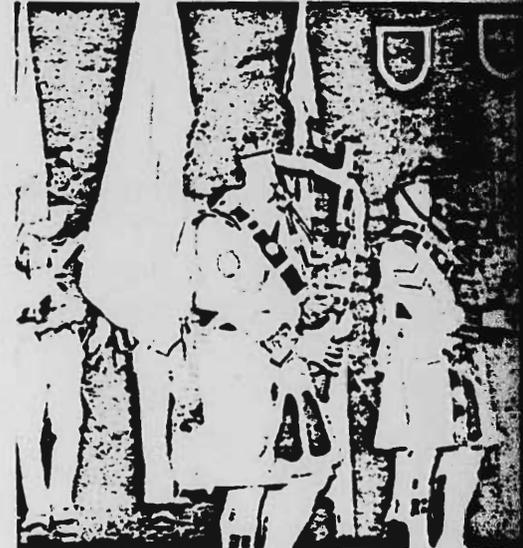
Supreme President Smyrnis addresses the welcoming ceremonies.



The Honorable Joseph Clark, leader of the opposition party in Canada, discussed the contributions of Greek immigrants to Canadian society.

Canada; Nick C. Demeris, Houston, TX, Supreme Secretary; James Mazarakos, Springfield, MA, Supreme Treasurer; George Charles, Washington, DC, Supreme Counselor; George Drivas, Anaheim, CA, Supreme Governor; John Economou, Akron, OH, Supreme Governor; Mike Giannirakis, Weirton, WV, Supreme Governor; Nick Janetides, Indianapolis, IN, Supreme Governor; George Athens, Denver, CO, Supreme Governor; Harry J. Pulos, Detroit, MI, Supreme Governor; Monthe N. Kofos, Marlboro, MA, Supreme Athletic Director.

The Daughters of Penelope elected Sonja Stefanadis of Clearwater, FL, as Grand President.



The Color Guard at the Grand Banquet.

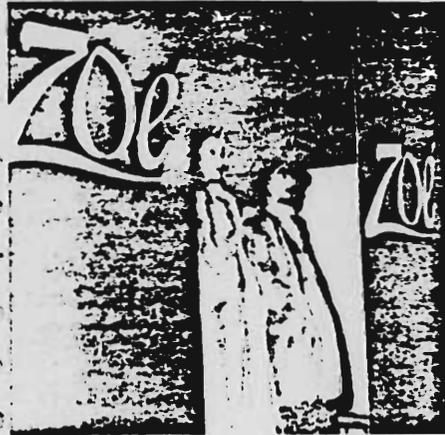
Other officers elected include: Maria Spirtos, Los Angeles, CA, Grand Vice-President; Elaine Kevgas, Lawrence, MA, Grand Secretary; Thalia Banis, Oakland, CA, Grand Treasurer; Lillian Demitry, Trenton, NJ, Grand Governor; Cleo Laras, Middleton, OH, Grand Governor; Anna Rakus, Seattle, WA, Grand Governor; Julia Constantine, Chicago, IL, Grand Governor; Anne Mountanos, San Francisco, CA, National Advisor, Maids of Athena.

The Sons of Pericles elected Chri-Chiames of Fresno, CA, S President; Dean N. Parago, IL, Supreme Vice ter A. Pappas, Charo.

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A Hochman
I, p.4



From Saturday to Saturday, the dancing never stopped . . .



This year's fashion show can be described in one word—Zoe. The designs of Zoe of Toronto were as beautiful as the models that wore them. When Greek-born Zoe Cokkinos came on the runway after the show in her simple black skirt and white blouse, she was as chic as any of her models in their thousand-dollar outfits.

preme Secretary; Peter Bissias, La Canada, CA, Supreme Treasurer; Sam Rine, North Chelmsford, MA, Supreme Governor; George Petrakakis, Patterson, NJ, Supreme Governor; Andrew Kanel, Elmhurst, IL, Supreme Governor.

The Maids of Athena elected Sandy Tarabicos of Wilmington, DE, as Grand President.

Other officers elected include: Daphne Papamichael, Washington, DC, Grand Vice-President; Eleni Boyadjis, Philadelphia, PA, Grand Secretary; Kukla Andros, St. Petersburg, FL, Grand Treasurer; Anne Chresanthakes, Wilmette, IL, Grand Governor; Joanne Tsatis, Worcester, MA, Grand Governor.

AHEPA Honors Cachules



Sam Cachules, President of the Atlantic Bank of New York City, was honored at the Grand Banquet by then Supreme Vice-President Gus Coffinas. Coffinas said that the award was given to Cachules "to recognize the many contributions he has made to the Order of AHEPA, to the Hellenes, and to mankind everywhere."

The plaque read:

To Soterios N. Cachules.

In recognition of his numerous contributions to educational, civic and humanitarian causes:

His professional success is worthy of respect,

His philanthropy is worthy of emulation.

August 13, 1981.

In thanking the Ahepans for the award, Cachules said: "I humbly accept this from the Order of AHEPA. What I have done, I have done from a love the Atlantic Bank and I have for the Order of AHEPA and for the Greek community in the United States and Thank you all."

Attachment I, AS



A Hellenic Renaissance

The following are excerpts from the address of Supreme President Nick Smyrnis at the convention Grand Banquet on August 13.

For the past two years you have given me a front row seat in the life of this great order. During this time I have experienced the AHEPA on every level—international, national, district, and chapter. I have come to understand not only what the AHEPA means to Presidents and Prime Ministers, but to the retired seamstress in Chicago, to the young college graduate in California, and to the successful restaurateur in Cincinnati or here in Toronto.

The past of our people is rooted in the great waves of immigration here in the early 1900's. However, the greatness of our forefathers, I believe, has yet to be truly recognized.

In the beginning they travelled thousands of miles crammed into ships with hundreds of other immigrants, and often had to huddle against the ship's hull to protect against the cold mist and icy winds. One person's disease would spread like wildfire on a parched desert plain, and often entire ships were quarantined and returned to Europe, their human baggage now not only poorer, but diseased as well.

Those who did enter the new world came penniless, not speaking the English language, and constantly facing the spectre of rejection and discrimination.

In the industrial marketplace, the immigrants offered their hard work, long hours, and the desire to succeed. But the Greeks also came here historically and culturally rich. In struggling to survive, they were armed with a secret weapon, a part of their personality that has been passed on from one generation of Hellene to another. Hellenic pride was the immigrants' great asset and most precious possession. The Greek is by nature a giver, not a taker. During the great depression, for example, the Greek immigrant learned that "Government relief" meant what *others* would take from the Government—not he, however. His *philotimo*, or sense of honor was much too big. This is a part of our Hellenic tradition.

Although the AHEPA was formed in Atlanta, Georgia, by eight young men in 1922, it is more appropriate to say, simply, that it was an idea whose time was overdue. The AHEPA began when most Greeks realized that they would remain in their adopted lands; that their children and grandchildren were not Greeks living abroad, but Canadians and Americans of Hellenic heritage.

These so-called AHEPA old-timers built the churches for our Hellenic rites of passage. They built schools to teach the Greek language to their children, for what Hellene does not understand the importance of language and communication? And they built the AHEPA as an organization and network to provide for the overall direction of our people.

It is not that we have failed, but that we have succeeded only too well. No longer do we have to integrate ourselves into these new societies . . . we are now an integral part of their makeup. We are elected to Parliament and Congress, we are Judges, Doctors, Scientists, Teachers, and every other occupation. We have not risen to the same education-

al level at the same rate as the rest of the society, we have far surpassed it.

Overcoming of our goals must not be seen as a disaster, however, but as a challenge. The new trails we must blaze in order to keep the AHEPA relevant will require as much courage, intelligence and perseverance as needed by the Hellenes in the early part of this century. We can no longer count on first generation Hellenes to invigorate our culture. It is now our responsibility to pass the mantle of leadership onto the children and grandchildren of our pioneers.

We will be facing a new environment. An environment as foreign and difficult as that faced by our forefathers. The life of the new world immigrant will never be repeated. Our children and grandchildren in many cases will never have the opportunity to attend Greek schools, and since we are not ghetto-ized, we will be unable to come in contact with many of the other Hellenes in our communities. Our increasing affluence might tend to let us forget those who are not so affluent. If we are not up to the task, our Hellenic days will be numbered.

I throw these out as possibilities, not certainties; as challenges, not forgone conclusions. If we maintain our Hellenic identity, it will not be because we have to, but because we *want* to. Not because of discrimination against us, but because of our desire to know who we are, "Know Thyself" . . . that is a part of our Hellenic tradition.

But I believe we are up to the challenge, the challenge of a renaissance, a Hellenic renaissance in North America. These past two years, I hope, have just been the beginning.

The Hellenes are an ancient and the noblest of people, and next year the AHEPA celebrates its 60th Anniversary. I am confident that in the years ahead, even though none of us in this room may live to see it, AHEPA will be celebrating its 100th, 150th, and 200th Anniversary—and our heritage will remain strong. I am confident of it because the preservation of our heritage, of its history, culture, and values, is the most essential aspect of our identity. That too, ladies and gentlemen, is a part of Hellenism.

Concluding, this is my last opportunity to address you as your Supreme President. Twice you have bestowed upon me the highest honor that can be granted by the Hellenes of North America to one of their ancestry—the Supreme Presidency of the Order of AHEPA.

I have written in this convention's yearbook, that on many occasions during the past two years my best may not have been good enough. My judgement may have differed from others. In my constant quest for excellence, I may have stumbled. In spite of my shortcomings, however, "I have "walked beside me." You have shown me the way and together—in harmony—we have succeeded"

The Poles have a salutation which fits. When leaving one another, the one says "Remain with God." The other replies "Remain with God." We stay well.

A Attachment I,
Ahepan
P. 6

304033267



MERCANTILE-SAFE DEPOSIT & TRUST COMPANY

We are CHARGING your account as per items below. Please see that the amount is deducted on your books so that our accounts may agree. FOR

DEPARTMENT International Dept.
AUTHORIZED BY *Norman C. Decker*

Draft #51542 for C\$1,482.28 @ .8520 plus \$6.00 draft fee.

DATE 9/9/81

CHARGE Citizens For Sarbarnes
P.O. Box 10644
Baltimore, Maryland 21204

ACCT. NO. 617195-8

\$ 1,268.90

AMOUNT

WBI 51542

MERCANTILE SAFE DEPOSIT AND TRUST
BALTIMORE, MARYLAND

WHEN CORRESPONDING, PLEASE GIVE NUMBER AND NAME OF BANK AT LEFT.

September 9, 1981

AGAINST THIS CHECK

FOR C.P. Hotels Royal York

AMOUNT DROPS One Thousand Four Hundred Eighty Two and 28/100 Canadian Dollars

Payable at Drawee's rate for sight drafts on New York if issued in U.S. Dollars

AMOUNT IN FIGURES C\$1,482.28

Canadian Imperial Bank of Commerce
Toronto, Ontario, Canada

NON-NEGOTIABLE
Norman C. Decker
Authorized Signature
Patricia A. Wainman

CHECK SOLD TO:

Citizens for Sarbarnes
P.O. Box 10644
Baltimore, Maryland 21204

PURCHASER'S STATEMENT

Rate	U.S. Equivalent	Comm.	Air Mail	Total
.8520	\$1,262.90	\$6.00		\$1,268.90

METHOD OF PAYMENT BY CUSTOMER

CHARGE TO ACCOUNT [] CHECK RECEIVED [] CASH RECEIVED
ACCT. NO. 617195-8

WE CONFIRM SALE OF THIS CHECK DESCRIBED HEREIN, SUBJECT TO THE CONDITIONS PRINTED ON THE REVERSE SIDE, AND SUGGEST THAT THIS CHECK BE FORWARDED BY REGISTERED MAIL.

CUSTOMER RECEIPT

7

Attachment I, p. 7

10/22/01

et / and / and de la Reception

CITIZENS FOR SARBANES

Factor A Mr. Dean Challos
2327 Dirksen Building
WASHINGTON D.C. 20510

60025360

Covers - Nombre de Couverts

Date - Date /sd. Aug. 12/31
Hour - Heurs

Room - Salle TERRITORIES

Quantity Quantite	BREAKFAST PETIT DEJEUNER	LUNCH DEJEUNER	RECEPTION RECEPTION	DINNER DINER	MEETING REUNION	Unit Price Prix Unitaire	Amount Montant
	COFFEE / CAFE						
	MINERALS						
	LIQUOR / SPIRITUEUX						
	BEER / BIÈRE						
	WINE (RED) / VIN (ROUGE)						
	WINE (WHITE) / VIN (BLANC)						
	LIQUEUR						
	10%	SALES TAX					
	15%	GRATUITIES / POUR BOIRES					
	RENTAL						
MISC.	SCREENS ECRAN	PROJECTORS PROJECTEUR	MICS MICROPHONE	FLIP CHARTS TABLEAU			
SALES TAX							

3040384674

2 ³²
1 ⁵⁴
1 ²²

1027.7
52.56
110.00

118.60
173.00

VERIFIED

8

TOTAL: Attachment I P.O.

CP Hotels 
Royal York 

100 Front Street West
 Toronto, Ontario, Canada M5J 1E3
 (416) 368-2511 Telex 085-23918

CANADIAN PACIFIC HOTELS LIMITED

CITIZENS FOR SARBANES
 ATTN MR DEAN CHALLOS
 2327 DIRKSEN BUILDING
 WASHINGTON DC 20510

DATE AUG. 13, 1981 PAGE 1
 ACCOUNT 6C025360 INVOICE

PLEASE DETACH TOP PORTION OF
 THIS STATEMENT AND RETURN
 WITH YOUR REMITTANCE

PLEASE DETACH AND RETURN WITH YOUR CHEQUE.
 YOUR CANCELLED CHEQUE WILL BE A VALID RECEIPT.

83040384675

DATE	VOUCHER ROOM/INVOICE	DESCRIPTION	DEBIT	CREDIT
81 08 12	009361	TERR RM FCTN	1,482.28	
	CURRENT	1,482.28		
		<i>Handwritten: 1,262.40</i>	<i>1,262.40</i>	<i>Handwritten: 219.88</i>
		<i>Handwritten: 16.00</i>	<i>16.00</i>	<i>Handwritten: 205.88</i>
		<i>Handwritten: 1,262.40</i>	<i>1,262.40</i>	
		<i>Handwritten: 7</i>	<i>7</i>	
		<i>Handwritten: 6.00</i>	<i>6.00</i>	<i>Handwritten: Change draft</i>

THIS ACCOUNT IS NOW DUE AND PAYABLE.
 PLEASE DISREGARD IF PAID SINCE STATEMENT DATE

PLEASE PAY THIS AMOUNT

1,482.28

OVERDUE BALANCES SUBJECT TO SURCHARGE
 OF 1% PER MONTH OVER ONE MONTH.

Canadian Pacific Hotels Limited

9

Attachment I, p 4

J. OR MRS. JOHN BEKRAKIS
705-A RALEIGH CT 942-0593
BIRMINGHAM, AL 35209

8/12/84 892
1084
01-118
620

PAY TO THE ORDER OF CITIZENS FOR CARBONES \$ 50.00
Fifty 50 DOLLARS



FOR John Bekrakis
⑆1:06 200 1 186⑆ 1 78 5230 2⑈ 0892

ANDREAS A. BOYADJIS
ATTORNEY AT LAW
31 SOUTH STREET
MORRISTOWN, N. J. 07960

5331
85-7242
2312

PAY TO THE ORDER OF



Andreas A. Boyadjis

⑆1:22 2724 26⑆ 012 158 2⑈

10

Attachment I, p. 10

0-2129
719

(PLACE) (DATE)

PAY TO THE ORDER OF CITIZENS BANK DO NOT WRITE IN THESE SPACES

DO TO ORDER IF NONE SPECIFIED, UNLESS DENIED IN U.S. MONEY.

Dollars and	100 the \$ 10.00
-------------	---------------------

WHICH SUM IS COLLECTIBLE IN THE UNITED STATES AT PAR (IN FULL) THROUGH THE FEDERAL RESERVE BANK OF CHICAGO, ILLINOIS, OR IN ANY OTHER COUNTRY IN ITS CURRENCY AT THE CURRENT BUYING RATE FOR UNITED STATES DOLLARS.

CITIZENS
BANK & TRUST COMPANY
PARK RIDGE (CHICAGO 60606) ILLINOIS

T. P. OR BETTY S. DIONISOS

REGISTERED ACCT. NO. BY _____

SIGNATURE AND NUMBER TO CORRESPOND TO CURRENT UNITED SECURITY ACCOUNT CARD

⑆071921299⑆ 5⑈47629 8⑈

1208

NICHOLAS D. MATSAKIS, D.D.S.
MRS. N. MATSAKIS
1410 JAMAICA CT. 314 - 966-2669
ST. LOUIS, MO. 63122

Aug 14 1981 4.98
810

PAY TO THE ORDER OF Citizens Bank \$ 25.00

Twenty five and no/100 DOLLARS

 **SOUTHWEST BANK**
ST. LOUIS, MISSOURI 63139

Nicholas Matsakis D.D.S.

MEMO _____

⑆0810⑈0098⑆ ⑈13 387 6⑈

130

ASPASIA M. MITCHELL
E. PETER MITCHELL
17 MITCHELL DRIVE
NIANTIC, CT 06357
OKEMO VILLAGE
LUDLOW, VT 05149

August 14 1981 51-1
111

PAY TO THE ORDER OF Citizens Bank \$ 100.00

One hundred and no/100 DOLLARS

 68 Boston Post Rd.
Waterford
Connecticut 06385

E. Peter Mitchell

⑆100012⑆ 15180568⑈ 0130

11

Attachment I p.11

83040384677

HELEN PAPPAS
4905 LINDELL
ST. LOUIS, MO. 63108

557

8-12 1981 4-128
810

PAY TO THE
ORDER OF

Citizen for Suburban

\$ 50.00

Fifty and no/100

DOLLARS



CITY BANK

4825 Lindell Boulevard
Saint Louis, Missouri 63108

Helen Pappas

MEMO

⑆081001280⑆ 3 46 492 2⑈ 0557



Merrill Lynch Cash Management Account

273

STEVEN N. PAPPAYLIOU
ANGELA S. PAPPAYLIOU
34 HORIZON AVENUE
OCEANPORT, NJ 07757

Aug. 13 1981 25-00
440

Pay to the
order of

Citizen for Suburban

\$ 60

Sixty & no/100

Dollars

BANK ONE.



BANK ONE OF COLUMBUS, NA
Columbus, Ohio 43215

Steven Pappayliou

Memo

⑆000273⑈⑆⑆044000804⑆ 3012143937⑈

LEON OR JOHANNA SPANOS
514 MEDINA DR.
ST. LOUIS, MO 63122

6208

70-16
810

PAY TO THE
ORDER OF

Citizen for Suburban

DOLLARS



first illinois bank

P.O. Box 459
East St. Louis, IL 62202

MEMO

⑆081000168⑆ 40 0657 3⑈ 6208

12

Attachment I, p. 12

MARTIN MOTEL
LILLIAN CARO OR NICHOLAS C. CARO, M.D.
ROLLA, MISSOURI 65401

2012

PAY TO THE ORDER OF

Getting me for expenses
from the trip Rolla, Mo Costs

July 12 19*81* ⁸⁰⁻¹⁰⁴ ₈₁₅
\$25.00

DOLLARS



PHELPS COUNTY BANK
PH. 364-5202 Rolla, Missouri 65401

MARTIN MOTEL

By *Lillian Caro*

FOR

⑈002012⑈ ⑆081501049⑆ 10 0888 9⑈

83040684679

MRS. MARY OR GEORGE J. CARAS
201 W. COLLEGE
MARION, ILL. 62959

531

Aug 12 19*81* ⁷⁰⁻²²⁵⁹ ₈₁₂

PAY TO THE ORDER OF

Citizens for Suburban *\$25.00*
Twenty Five Dollars *25* DOLLARS



BANK OF EGYPT

MARION, ILLINOIS

Mary Caras

MEMO

⑆081222593⑆ ⑆145 529 3⑈

C. L. CHIPOKAS

P. O. BOX 4848
CEDAR RAPIDS, IOWA 52407

3561

8-12 19*81* ⁴⁷⁻¹ _{739 0}

PAY TO THE ORDER OF

Citizens for Suburban *\$25.00*
Twenty-five and *25* DOLLARS

Merchants National Bank
Cedar Rapids, Iowa 52401



C. L. Chipokas

MEMO

⑆073900014⑆ 148188527⑈ 3561

13

GEORGE L. ZANETAKOS
9727 Mt. Plazah Road, No. 512
Silver Spring, Maryland 20903

1077

301-484-7466

August-12-1981

92-227
136

Pay to the
order of

Citizens for Sustained

\$ 100 ⁰⁰/₁₀₀

One hundred

⁰⁰/₁₀₀

Dollars

maryland national bank

BETHESDA, MARYLAND 578

Memo

campaign contribution

George L. Zanetakos

⑆0550032721⑆1077⑆0 953066115⑆

83040384630

14

Attachment I, p. 14

JOHN KALPAS
THERESA KALPAS

No. 3066

1-32
290

Pay to the
order of

\$ 35.100

Dollars

National Bank of North America 18

1180 GRAND AVE., SOUTH HEMPSTEAD, N. Y. 11890

Memo

⑆028000325⑆718⑆0117 5596⑆

STEPHEN S. SCOPAS
136-56 - 39TH AVENUE
FLUSHING, NY 11354

1-2/210/108

PAY TO THE
ORDER OF

8/31 1981 \$100.00

DOLLARS



The Chase Manhattan Bank, N.A.
Northern Blvd. & Little Neck Pkwy.
Little Neck, N.Y. 11363

⑆005305⑆ ⑆021000021⑆ 108 1 025270⑆

15

Attachment II, p. 15

384631

50-846
214

DATE 10-18-81

No. 75649



PAY TO THE ORDER OF **THE OYSTERMEN'S BANK & TR. CO.** **\$100 AND 00 CTS**

TO THE ORDER OF

Citizen for Sarbanes

NOT VALID OVER \$1,000.00

P. Fuentes
SIGNATURE

179 Sycamore ave
ADDRESS C.I. NY. 11227

THE OYSTERMEN'S BANK
AND TRUST COMPANY
KEY BANK
SAYVILLE • NEW YORK

⑆075649⑆ ⑆021408461⑆ ⑆906999993⑆

83040384632

16

Attachment I, p. 16

CITIZENS FOR SARBANES

P.O. Box 10644
Baltimore, Md. 21204

NO 1393 P

Campaign Contribution Receipt

August 29, 2001

To: _____

Occupation _____ Business Name _____

Business Address _____

Cash Check Contribution in kind Ticket

\$ _____
_____ Treasurer/Subtreasurer

83040384684

CITIZENS FOR SARBANES

P.O. Box 10644
Baltimore, Md. 21204

NO 1394 P

Campaign Contribution Receipt

To: _____

Occupation _____ Business Name _____

Business Address _____

Cash Check Contribution in kind Ticket

\$ _____
_____ Treasurer/Subtreasurer

18

Attachment I, A18



83040384635



19

Attachment I, 19

GLC# 9408

Edwards

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MD. 21201

January 24, 1983

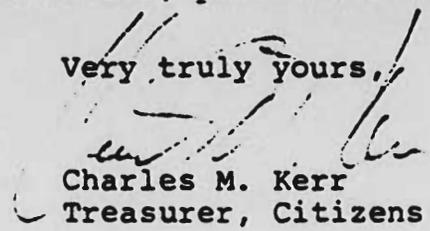
Mr. and Mrs. Steven N. Pappayliou
34 Horigon Avenue
Oceanport, New Jersey 07757

Dear Mr. and Mrs. Pappayliou:

Citizens for Sarbanes, Senator Paul S. Sarbanes' 1982 Senatorial campaign committee, has received an inquiry from the Federal Election Commission regarding your August 13, 1981, contribution in the amount of \$60.00 to the Committee. Your contribution was made by way of a check drawn on a Merrill Lynch Cash Management Account at Bank One of Columbus, NA, Columbus, Ohio. A copy of that check is enclosed for your reference.

The FEC has inquired as to the nature of this account. It is our assumption that this is a money-market fund account which both of you hold, as individuals, through Merrill Lynch, and that the account is not a corporate account. I would be grateful if you would confirm that assumption in writing to me at your earliest convenience. If our assumption is incorrect, please so advise me. If you have any questions regarding this matter, please call me at (301) 244-7544.

Very truly yours,



Charles M. Kerr
Treasurer, Citizens for Sarbanes

CMK:rmc

cc: The Honorable Paul S. Sarbanes

Enclosure

bcc: Mr. Peter N. Marudas
Mrs. Sebbie Svolos
✓ Mr. Conley Edwards
Mr. James Smith

1/24/83 2:4:30

83040384696

20

Attachment II

600 990



Merrill Lynch Cash Management Account

273

STEVEN N. PAPPAYLIOU
ANGELA S. PAPPAYLIOU
34 HORIZON AVENUE
OCEANPORT, NJ 07757

Aug. 13 1981 ~~25.00~~
440

Pay to the order of Citizen for Savings \$ 60 —

Sixty & ⁰⁰/₁₀₀ ————— Dollars

BANK ONE.



BANK ONE OF COLUMBUS, NA
Columbus, Ohio 43215

Steven Pappayliou

Memo

⑆000273⑈⑆044000804⑆ 3012143937⑈

8304

21

Mr. Conley Edwards
January 26, 1983
Page Two

When deposited by the Sarbanes Committee in its account, the Canadian currency was deposited in its United States currency equivalent at the then-prevailing rate of exchange as \$8.06 U.S. for each contributor as indicated on each of the receipts. Thus, these two contributions had a total value of \$16.12 U.S., and account for the difference between the \$1,230 figure you calculated and the \$1,226.12 figure I reported in my January 13 letter.

(2) Lillian Caro contribution of \$100:

3 3 0 4 0 3 9 4 6 3 9
You questioned whether the contribution by Lillian Caro made by her check drawn on an account styled "Martin Motel" at the Phelps County Bank of Rolla, Missouri, one of the contributions included in Exhibit C to my January 13, letter, was a corporate contribution. Attached to this letter is a memorandum, dated January 24, 1983, from Ms. Emily Gibbs, one of the members of the Sarbanes Committee campaign staff, to me, which outlines the steps our Committee took to confirm that this contribution was not a corporate contribution. You will note that in August, 1981, before the check was deposited, Mrs. Caro was called by Ms. Gibbs, and she advised Ms. Gibbs that the check was not drawn on a corporate account. Furthermore, Ms. Gibbs, on January 24, 1983, called the Phelps County Bank, which confirmed that the account in question is not a corporate account.

(3) Steven M. Pappayliou contribution of \$60:

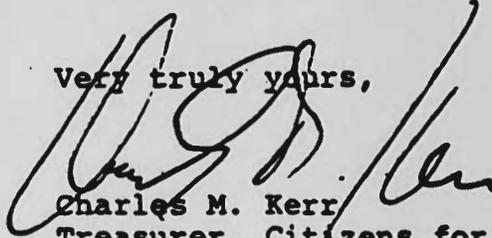
You questioned whether the contribution of Steven N. Pappayliou made by his check drawn on the money-market account of Mr. and Mrs. Pappayliou through their Merrill Lynch Cash Management Account maintained by Merrill Lynch through Bank One of Columbus, NA, one of the contributions included in Exhibit C to my January 13 letter, was a corporate contribution. Ms. Gibbs' memorandum sets forth the steps our Committee took to confirm that this contribution could be received and deposited by our Committee in accordance with the applicable FEC regulations. You will note that in August, 1981, before this check was deposited, Ms. Gibbs called an FEC Information Specialist, described the check to the Specialist, and was advised by the Specialist that the check was acceptable and could be deposited by our Committee. As per your request on January 24, I also sent a letter, that day, to Mr. and Mrs. Pappayliou, asking for confirmation that the account, upon which these funds were drawn, is a money-market fund account and not a corporate account. A copy of that letter was sent to you, under separate cover, yesterday. Today, I received a telephone call from Mr. Pappayliou, responding to my January 24 letter. Mr. Pappayliou confirms that this check was drawn on the money-market fund of Mr. Pappayliou and his wife and represents personal, rather than corporate funds. A copy of my letter to Mr. Pappayliou of today's date setting forth his representations in that regard is also enclosed.

23

Mr. Conley Edwards
January 26, 1983
Page Three

Please let me know if our Committee can be of any further assistance with regard to your investigation of this Complaint.

Very truly yours,



Charles M. Kerr
Treasurer, Citizens for Sarbanes

CMK:rmc

✓ cc: Kenneth A. Gross, Esq.

Attachment

83040384690

24

Attachment III, p3

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MD. 21201

January 26, 1983

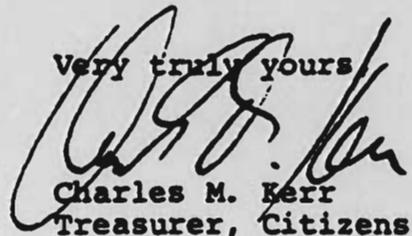
Mr. Steven N. Pappayliou
34 Horigon Avenue
Oceanport, New Jersey 07757

Dear Mr. Pappayliou:

This letter is intended to confirm the telephone message which you left with my office today in response to my letter to you of January 24, 1983. You advised that the \$60 check dated August 13, 1981, made payable to Citizens for Sarbanes, drawn on the Merrill Lynch Cash Management Account at Bank One of Columbus, N.A., a copy of which was attached to my January 24 letter, is a money-market fund check, representing a withdrawal from the money-market fund account which you and your wife have with Merrill Lynch. You further advised that the account is a personal account for your wife and yourself and is not a corporate account. I will convey this information to the FEC.

On behalf of Senator Sarbanes and Citizens for Sarbanes, please accept our warmest thanks for your prompt response and assistance.

Very truly yours


Charles M. Kerr
Treasurer, Citizens
for Sarbanes

CMK:dmv

cc: The Honorable Paul S. Sarbanes

25

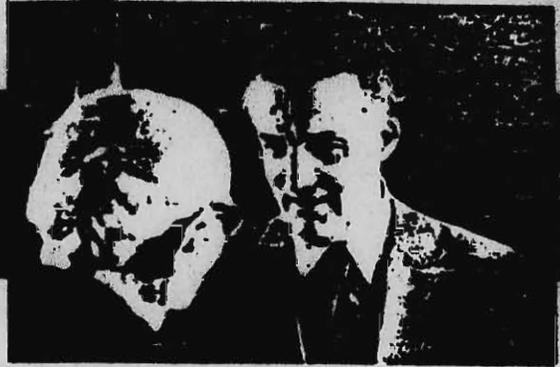
Attachment III, p.4

83040334691

R-1-25-83

RE-ELECT SENATOR PAUL SARBANES

DEMOCRAT FOR U.S. SENATE '82



MEMORANDUM

TO: Chuck Kerr
 FROM: Emily Gibbs *Emily*
 DATE: January 24, 1982
 RE: Contributions to CITIZENS FOR SARBANES
 Deposited August 20, 1981

83040384672

1. Lillian Caro
 Martin Motel
 Rolla, Missouri 65401 \$100

Upon receipt of the check from Mrs. Caro, approximately two days prior to the deposit date, I telephoned her in Rolla, Missouri to ask if this money was drawn from a corporate account. She told me that the account, Martin Motel, is not a corporate account.

Today, I called to confirm our conversation. Mrs. Caro has moved to Chicago. I then called the Phelps County Bank, 8th & Pine Streets, Rolla, Missouri 65401, telephone 314-364-5202, and spoke with Ms. Clara West, the bookkeeper in the Accounting Department. She told me that the Martin Motel account is still active and is not a corporate account.

2. Steven M. Pappayliou
 34 Horigon Avenue
 Oceanport, New Jersey 07757 \$60

Upon receipt of the check, approximately two days prior to the deposit date, I telephoned the Federal Election Commission to question the regulation on accepting a contribution from a money market account. I spoke with an Information Specialist, explaining that the check was from the Merrill Lynch Cash Management Account, a money market account. I was told that this contribution was

26

Attachment III, p. 5

CITIZENS FOR SARBANES

P.O. Box 10644
Baltimore, Md. 21204

№ 1397 P

Campaign Contribution Receipt

August 28, 2001

To: William Caro

Martin Motel

Rolla, Missouri 65701

Occupation _____ Business Name _____

Business Address _____

Cash Check Contribution in kind Ticket

\$ _____ Treasurer/Subtreasurer

03040384693

27

CITIZENS FOR SARBANES

P.O. Box 10644
Baltimore, Md. 21204

NO 1404 P

Campaign Contribution Receipt

August 20, 1991

To: Steven M. Pappayliou *m/ll*
24 Horizon Avenue
Camden, New Jersey 07707

Occupation _____ Business Name _____

Business Address _____

Cash Check Contribution in kind Ticket

\$ _____ Treasurer/Subtreasurer

83040384694

28

Attachment III, p.7



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lawrence J. Hogan
Hogan for Senate
Post Office Box 545
Seabrook, Maryland 20706

RE: MUR 1499
Citizens for Sarbanes

Dear Mr. Hogan:

The Federal Election Commission has reviewed the allegations of your complaint dated October 25, 1982, and determined that on the basis of the information provided in your complaint, and information provided by the Respondent, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended, ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

cc: Honorable Paul S. Sarbanes

TJW

29

83040384695



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles M. Kerr, Treasurer
Citizens for Sarbanes
1800 Mercantile Bank and Trust Building
2 Hopkins Plaza
Baltimore, Maryland 21201

RE: MUR 1499
Citizens for Sarbanes

Dear Mr. Kerr:

On October 29, 1982, the Commission notified you of a complaint alleging that your Committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on _____, 1983, determined that on the basis of the information in the complaint, and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

cc: Honorable Paul S. Sarbanes

83040594676

Tsu

30

203930

RECEIVED AT THE REC
COFF 9443

VENABLE, BAETJER AND HOWARD

83 FEB 1 P 1: 02

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1800 MERCANTILE BANK & TRUST BUILDING

2 HOPKINS PLAZA

BALTIMORE, MARYLAND 21201

(301) 244-7400

WASHINGTON, D. C. OFFICE

VENABLE, BAETJER, HOWARD & CIVILETTI

SUITE 704

1301 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20004

(202) 763-4300

*ADMITTED IN DISTRICT OF COLUMBIA
NOT ADMITTED IN MARYLAND

WRITER'S DIRECT NUMBER IS

244-7544

January 26, 1983

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Mr. Conley Edwards
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1499

Dear Mr. Edwards:

This letter is written to provide you with the additional information you requested regarding the above-referenced Complaint in our telephone conference of January 24.

In that conference, you raised three questions:

(1) Total amount of contributions received by Sarbanes Committee as the result of reception of August 12, 1981, at AHEPA Convention: In my letter to the Commission of January 13, 1983, I stated that contributions from 18 contributors were received by the Sarbanes Committee as the result of the reception at issue in this Complaint, having a total value of \$1,226.12. You stated that, by your calculation, based on the checks and receipts attached to my letter as Exhibit C, those contributions totalled \$1,230. I pointed out to you that two of the contributions (Olga Bancroft, Receipt No. 1393, and Mr. and Mrs. Bernard Helis, Receipt No. 1394) were made in Canadian currency, i.e., ten Canadian dollars from each of these contributors.

33040624677

Mr. Conley Edwards
January 26, 1983
Page Two

When deposited by the Sarbanes Committee in its account, the Canadian currency was deposited in its United States currency equivalent at the then-prevailing rate of exchange as \$8.06 U.S. for each contributor as indicated on each of the receipts. Thus, these two contributions had a total value of \$16.12 U.S., and account for the difference between the \$1,230 figure you calculated and the \$1,226.12 figure I reported in my January 13 letter.

(2) Lillian Caro contribution of \$100:

You questioned whether the contribution by Lillian Caro made by her check drawn on an account styled "Martin Motel" at the Phelps County Bank of Rolla, Missouri, one of the contributions included in Exhibit C to my January 13, letter, was a corporate contribution. Attached to this letter is a memorandum, dated January 24, 1983, from Ms. Emily Gibbs, one of the members of the Sarbanes Committee campaign staff, to me, which outlines the steps our Committee took to confirm that this contribution was not a corporate contribution. You will note that in August, 1981, before the check was deposited, Mrs. Caro was called by Ms. Gibbs, and she advised Ms. Gibbs that the check was not drawn on a corporate account. Furthermore, Ms. Gibbs, on January 24, 1983, called the Phelps County Bank, which confirmed that the account in question is not a corporate account.

(3) Steven M. Pappayliou contribution of \$60:

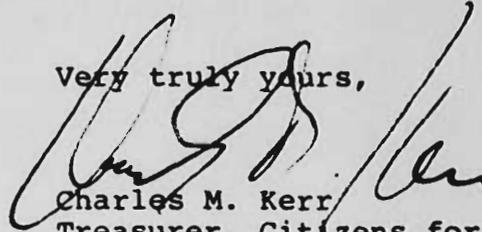
You questioned whether the contribution of Steven N. Pappayliou made by his check drawn on the money-market account of Mr. and Mrs. Pappayliou through their Merrill Lynch Cash Management Account maintained by Merrill Lynch through Bank One of Columbus, NA, one of the contributions included in Exhibit C to my January 13 letter, was a corporate contribution. Ms. Gibbs' memorandum sets forth the steps our Committee took to confirm that this contribution could be received and deposited by our Committee in accordance with the applicable FEC regulations. You will note that in August, 1981, before this check was deposited, Ms. Gibbs called an FEC Information Specialist, described the check to the Specialist, and was advised by the Specialist that the check was acceptable and could be deposited by our Committee. As per your request on January 24, I also sent a letter, that day, to Mr. and Mrs. Pappayliou, asking for confirmation that the account, upon which these funds were drawn, is a money-market fund account and not a corporate account. A copy of that letter was sent to you, under separate cover, yesterday. Today, I received a telephone call from Mr. Pappayliou, responding to my January 24 letter. Mr. Pappayliou confirms that this check was drawn on the money-market fund of Mr. Pappayliou and his wife and represents personal, rather than corporate funds. A copy of my letter to Mr. Pappayliou of today's date setting forth his representations in that regard is also enclosed.

03040304678

Mr. Conley Edwards
January 26, 1983
Page Three

Please let me know if our Committee can be of any further assistance with regard to your investigation of this Complaint.

Very truly yours,



Charles M. Kerr
Treasurer, Citizens for Sarbanes

CMK:rmc

cc: Kenneth A. Gross, Esq.

Attachment

83040384679

R-1-25-83

RE-ELECT SENATOR PAUL SARBANES

DEMOCRAT FOR U.S. SENATE '82



83040384700

MEMORANDUM

TO: Chuck Kerr
 FROM: Emily Gibbs *Emily*
 DATE: January 24, 1982
 RE: Contributions to CITIZENS FOR SARBANES
 Deposited August 20, 1981

1. Lillian Caro
 Martin Motel
 Rolla, Missouri 65401 \$100

Upon receipt of the check from Mrs. Caro, approximately two days prior to the deposit date, I telephoned her in Rolla, Missouri to ask if this money was drawn from a corporate account. She told me that the account, Martin Motel, is not a corporate account.

Today, I called to confirm our conversation. Mrs. Caro has moved to Chicago. I then called the Phelps County Bank, 8th & Pine Streets, Rolla, Missouri 65401, telephone 314-364-5202, and spoke with Ms. Clara West, the bookkeeper in the Accounting Department. She told me that the Martin Motel account is still active and is not a corporate account.

2. Steven M. Pappayliou
 34 Horigon Avenue
 Oceanport, New Jersey 07757 \$60

Upon receipt of the check, approximately two days prior to the deposit date, I telephoned the Federal Election Commission to question the regulation on accepting a contribution from a money market account. I spoke with an Information Specialist, explaining that the check was from the Merrill Lynch Cash Management Account, a money market account. I was told that this contribution was

CITIZENS FOR SARBANES

P.O. Box 10644
Baltimore, Md. 21204

NO 1397 P

Campaign Contribution Receipt

August 20, 1991

To: William Gore

Martin Motel

1115, Wisconsin 63102

Occupation _____ Business Name _____

Business Address _____

Cash Check Contribution in kind Ticket

\$ _____ Treasurer/Subtreasurer

CITIZENS FOR SARBANES

P.O. Box 10644
Baltimore, Md. 21204

NO 1404 P

Campaign Contribution Receipt

August 20, 1991

To: Steven M. Pappayliou *11/11*

24 Horizon Avenue

10000, New Jersey 07057

Occupation _____ Business Name _____

Business Address _____

Cash Check Contribution in kind Ticket

\$ _____ Treasurer/Subtreasurer

83040384701

January 26, 1983

Mr. Steven N. Pappayliou
34 Horigon Avenue
Oceanport, New Jersey 07757

Dear Mr. Pappayliou:

83040384708

This letter is intended to confirm the telephone message which you left with my office today in response to my letter to you of January 24, 1983. You advised that the \$60 check dated August 13, 1981, made payable to Citizens for Sarbanes, drawn on the Merrill Lynch Cash Management Account at Bank One of Columbus, N.A., a copy of which was attached to my January 24 letter, is a money-market fund check, representing a withdrawal from the money-market fund account which you and your wife have with Merrill Lynch. You further advised that the account is a personal account for your wife and yourself and is not a corporate account. I will convey this information to the FEC.

On behalf of Senator Sarbanes and Citizens for Sarbanes, please accept our warmest thanks for your prompt response and assistance.

Very truly yours,

Charles M. Kerr
Treasurer, Citizens
for Sarbanes

CMK:dmv

cc: The Honorable Paul S. Sarbanes

✓ bcc: Mr. Conley Edwards
Mr. Peter N. Marudas
Mr. James Smith
Mrs. Sebbie Svolos
Ms. Emily Gibbs

203913

RECEIVED THE REC
66CA 9427

VENABLE, BAETJER AND HOWARD

83 JAN 31 P 2: 32

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1800 MERCANTILE BANK & TRUST BUILDING

2 HOPKINS PLAZA

BALTIMORE, MARYLAND 21201

(301) 244-7400

WASHINGTON, D. C. OFFICE

VENABLE, BAETJER, HOWARD & CIVILETTI

SUITE 704

1301 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20004

(202) 783-4300

*ADMITTED IN DISTRICT OF COLUMBIA -
NOT ADMITTED IN MARYLAND

WRITER'S DIRECT NUMBER IS

244-7544

January 26, 1983

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Mr. Conley Edwards
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1499

Dear Mr. Edwards:

This letter is written to provide you with the additional information you requested regarding the above-referenced Complaint in our telephone conference of January 24.

In that conference, you raised three questions:

(1) Total amount of contributions received by Sarbanes Committee as the result of reception of August 12, 1981, at AHEPA Convention: In my letter to the Commission of January 13, 1983, I stated that contributions from 18 contributors were received by the Sarbanes Committee as the result of the reception at issue in this Complaint, having a total value of \$1,226.12. You stated that, by your calculation, based on the checks and receipts attached to my letter as Exhibit C, those contributions totalled \$1,230. I pointed out to you that two of the contributions (Olga Bancroft, Receipt No. 1393, and Mr. and Mrs. Bernard Helis, Receipt No. 1394) were made in Canadian currency, i.e., ten Canadian dollars from each of these contributors.

8304038470

JAN 31 P 3: 28

Mr. Conley Edwards
January 26, 1983
Page Two

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(3) Steven M. Pappayliou contribution of \$60:

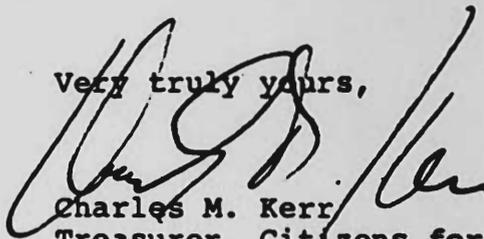
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83040684705

Mr. Conley Edwards
January 26, 1983
Page Three

Please let me know if our Committee can be of any further assistance with regard to your investigation of this Complaint.

Very truly yours,



Charles M. Kerr
Treasurer, Citizens for Sarbanes

CMK:rmc

✓ cc: Kenneth A. Gross, Esq.

Attachment

83040584706

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MD. 21201

January 26, 1983

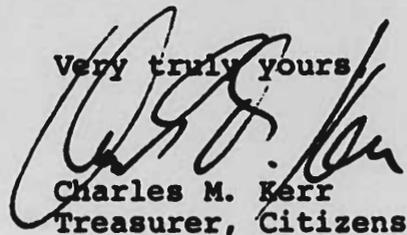
Mr. Steven N. Pappayliou
34 Horigon Avenue
Oceanport, New Jersey 07757

Dear Mr. Pappayliou:

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On behalf of Senator Sarbanes and Citizens for Sarbanes, please accept our warmest thanks for your prompt response and assistance.

Very truly yours,



Charles M. Kerr
Treasurer, Citizens
for Sarbanes

CMK:dmv

cc: The Honorable Paul S. Sarbanes

83040384707

R-1-25-83

RE-ELECT SENATOR PAUL SARBANES

DEMOCRAT FOR U.S. SENATE '82



MEMORANDUM

TO: Chuck Kerr
FROM: Emily Gibbs *Emily*
DATE: January 24, 1982
RE: Contributions to CITIZENS FOR SARBANES
Deposited August 20, 1981

1. Lillian Caro
Martin Motel
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Oceanport, New Jersey 07757 \$60

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83040384706

CITIZENS FOR SARBANES

P.O. Box 10644
Baltimore, Md. 21204

NO 1404 P

Campaign Contribution Receipt

To: Steven M. Pappayliou *m/ll* August 20, 1991

24 Horizon Avenue

Camden, New Jersey 07957

Occupation _____ Business Name _____

Business Address _____

Cash Check Contribution in kind Ticket

\$ _____ Treasurer/Subtreasurer

CITIZENS FOR SARBANES

P.O. Box 10644
Baltimore, Md. 21204

NO 1397 P

Campaign Contribution Receipt

To: Lillian Caro August 20, 1991

Martin Motel

Rolla, Missouri 65401

Occupation _____ Business Name _____

Business Address _____

Cash Check Contribution in kind Ticket

\$ _____ Treasurer/Subtreasurer

93040384709

CHE

03040384710

VENABLE, BARTJER AND HOWARD

ATTORNEYS AT LAW

1800 MERCANTILE BANK & TRUST BUILDING

2 HOPKINS PLAZA

BALTIMORE, MARYLAND 21201



Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

GCC# 9408

1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MD. 21201

January 24, 1983

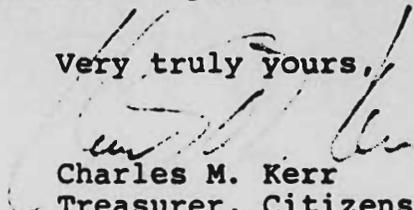
Mr. and Mrs. Steven N. Pappayliou
34 Horigon Avenue
Oceanport, New Jersey 07757

Dear Mr. and Mrs. Pappayliou:

Citizens for Sarbanes, Senator Paul S. Sarbanes' 1982 Senatorial campaign committee, has received an inquiry from the Federal Election Commission regarding your August 13, 1981, contribution in the amount of \$60.00 to the Committee. Your contribution was made by way of a check drawn on a Merrill Lynch Cash Management Account at Bank One of Columbus, NA, Columbus, Ohio. A copy of that check is enclosed for your reference.

The FEC has inquired as to the nature of this account. It is our assumption that this is a money-market fund account which both of you hold, as individuals, through Merrill Lynch, and that the account is not a corporate account. I would be grateful if you would confirm that assumption in writing to me at your earliest convenience. If our assumption is incorrect, please so advise me. If you have any questions regarding this matter, please call me at (301) 244-7544.

Very truly yours,



Charles M. Kerr
Treasurer, Citizens for Sarbanes

CMK:rmc

cc: The Honorable Paul S. Sarbanes

Enclosure

bcc: Mr. Peter N. Marudas
Mrs. Sebbie Svolos
✓ Mr. Conley Edwards
Mr. James Smith

83040584711

1983 JAN 24:30

CHK

63040384713

VENABLE, BARTER AND HOWARD

**ATTORNEYS AT LAW
1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201**



**Mr. Conley Edwards
Federal Election Commission
Washington, D. C. 20463**

RECEIVED
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RECEIVED BY THE REC

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83 JAN 17 P2:04

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ATTORNEYS AT LAW
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1800 MERCANTILE BANK & TRUST BUILDING

2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201
(301) 244-7400

WASHINGTON, D. C. OFFICE
VENABLE, BAETJER, HOWARD & CIVILETTI
SUITE 704
1301 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20004
(202) 783-4300

*ADMITTED IN DISTRICT OF COLUMBIA.
NOT ADMITTED IN MARYLAND

WRITER'S DIRECT NUMBER IS
244-7544

January 13, 1983

LAWRENCE J. MERWIN
JOHN W. SCHEFFEN
BARBARA E. SCHLAFF
FREDRIC A. PRESS
RONALD B. SHEFF
JAMES K. ARCHIBALD
CONSTANCE H. BAKER
G. STEWART WEBB, JR.
GEORGE W. JOHNSTON
F. DUDLEY STAPLES, JR.
EDWARD L. WENDER
DAVID M. FLEISHMAN
GEORGE E. REYNOLDS, III
JANA HOWARD
MARGARET LEE QUINN
MITCHELL KOLLMAN
JEAN E. KILPATRICK
SANA F. SHYBELL
VICKI L. HAWKINS
STEPHEN P. PARVIS
WILLIAM N. FITZPATRICK, JR.
JEFFREY R. AYRES
KENNETH R. HOFFMAN
BRIGID E. KENNEY
PHYLLIS COLE FRIEDMAN
FRANK L. KOLLMAN
ASBE DAVID LOWELL
BRUCE R. SPECTOR
ELLEN S. WALKER
JOHN H. MORRIS, JR.
EARL L. MATHENY
LESLIE A. VIAL
MAURICE BASKIN

M. LUCINDA MOTSKO
RICHARD J. SAFRANER
ROBERT A. RAPP
ANN H. BOSSE
DAVID S. ABRAMOFF
JACK L. HARVEY
CAROL E. GREENFELD
JOAN FISHER FELDMAN
CHARITY SCOTT
PETER S. BAUCIER
ELLYN L. BROWN
CHRISTOPHER R. HELLOTT
CYNTHIA ANN ROSS
CHARLES J. HABIT
CHRISTOPHER J. FRITZ
PETER E. KEITH
MARIANNE SCHMITT HELLAUER
W. ROBERT ZIRNHAM
KATHLEEN MORRIS McDONALD
CYNTHIA MEYERS HANN
YAAKOV S. NEUBERGER
MITCHELL W. SHAPIRO
JOHN S. WAYNE, III
ELIZABETH R. HUGHES
JAMES A. DUNBAR
RONALD W. TAYLOR
STEPHEN F. SIBBEK
ALISON D. KOHLER
PAUL D. SHELTON
WILLIAM T. FITZGERALD, JR.
STEPHEN R. CARNEY
FRANCIS R. LAWS

EDMUND P. DANDRIDGE, JR.
ARTHUR W. MACHEN, JR., P.C.
ROBERT H. THOMAS, P.C.
A. SAMUEL COOK, P.C.
ROBERT R. BAIR, P.C.
JACQUES T. SCHLENGER, P.C.
CHARLES S. REEVES, JR.
WILLIAM J. MCCARTHY, P.C.
RUSSELL R. RENO, JR., P.C.
THOMAS P. PERRINE, III, P.C.
BENJAMIN B. CIVILETTI, P.C.
GERALD M. RATZ, P.C.
LURE MARRBURY
STUART H. RONE, P.C.
C. VAN LEUVEN STEWART, P.C.
LAWRENCE S. WESCOTT, P.C.
GEORGE C. DOUB, JR.
JOHN HENRY LEWIN, JR., P.C.
ALAN D. YARBRO
NEAL D. GORDEN
ROBERT A. SHELTON
JACOB L. FRIEDEL
HARRY D. SHAPIRO
STANLEY MAZAROFF
LEE H. MILLER
FRANCIS THOMAS COLEMAN, JR.
THOMAS J. KENNEY, JR.
N. PETER LARBAU
DOUGLAS D. CONNAN, JR.
HARVEY R. CLAPP, III
BENJAMIN ROSENBERG
ROBERT G. SMITH
JAMES B. WRIGHT
ALEXANDER I. LEWIS, III

MAX STUL OPPENHEIMER
TERRY F. HALL
CRAIG E. SMITH
THOMAS S. MARTIN
BRYSON L. COOK
CHARLES N. KERR
BENSON E. LEGG
ROBERT G. AMES
HELL S. STRACHAN
RICHARD L. WASSERMAN

COUNSEL
JOHN HENRY LEWIN
NORWOOD S. DRICK
RICHARD W. ENDRY
WILBUR E. BIRNONS, JR.
PARTNER EMERITUS
JOSEPH FRANCE

RICHARD M. VENABLE (1838-1910)
EDWIN G. BAETJER (1888-1948)
CHARLES McH. HOWARD (1870-1942)

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1499

Dear Mr. Gross:

This letter is written in response to your letter of October 29, 1982, advising me, as treasurer of Citizens for Sarbanes (the "Sarbanes Committee"), of the above-referenced Complaint, and is intended to serve as the Sarbanes Committee's response.

The Complaint, filed by Senator Sarbanes' Republican opponent, Lawrence J. Hogan, just before the Maryland general election, appears to be nothing more than malicious speculation on Mr. Hogan's part that the Sarbanes Committee received "illegal donations from foreigners" at a reception held in Toronto, Canada, over a year prior to Mr. Hogan's Complaint, in August, 1981. The simple and complete response to Mr. Hogan's insinuations is that, so far as the Sarbanes Committee is aware, no campaign contributions have been made to it by any foreign national, as that term is defined by 11 CFR § 110.4(a), directly or through any other person, at any time, or as the result of any fundraising event.

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Kenneth A. Gross, Esq.
January 13, 1983
Page Two

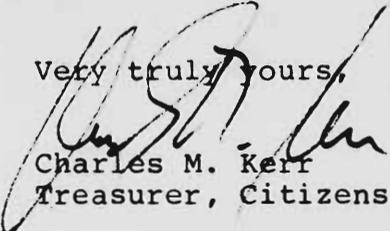
Turning specifically to the 1981 reception in Toronto, that reception was held in conjunction with the 59th Supreme Convention of the Order of AHEPA (American Hellenic Educational Progressive Association), which was held in Toronto August 8-15, 1981. Formed in 1922, AHEPA is an organization of Greek immigrants to North America, and their descendents, the purpose of which is to assist Americans and Canadians of Greek descent to preserve their Hellenic heritage. Senator Sarbanes is an Ahepan, and he was invited by AHEPA to address the Convention in Toronto on Thursday, August 13, 1981, at the Convention Grand Banquet. An article on the Convention which appeared in the AHEPAN in its Fall, 1981, issue, is enclosed for your reference as Exhibit A.

Since Senator Sarbanes attended the convention to address his fellow Ahepans and their families, and his trip was not, nor was it intended to be, a campaign function of the Sarbanes Committee, the Senator's travel expenses were paid by AHEPA. The Senator did, however, wish to have an opportunity to discuss his Maryland Senate campaign with those American Ahepans who had an interest in the matter. A reception was therefore held by the Committee for that purpose on August 12, 1981, at the Royal York Hotel in Toronto. Since this was a Sarbanes Committee function, the cost of the reception was paid by the Committee. Attached as Exhibit B are the Committee's records in that regard.

The reception was not, nor was it intended to be, a fund-raising event for the Committee. A total of 18 contributions were received, however, at the Reception or shortly thereafter, having a total value of \$1,226.12. All of these contributors have addresses in the United States. For your reference, enclosed, as Exhibit C, please find copies of the checks received from these contributors, and, with regard to the three contributors who made cash contributions, copies of our receipts for their contributions are enclosed.

Please let me know, at the address and telephone number set forth above on the letterhead, if our Committee can provide any further information you require in considering this Complaint.

Very truly yours,


Charles M. Kerr
Treasurer, Citizens for Sarbanes

Enclosure

CMK:rmc

8304038471

OFFICIAL PUBLICATION OF THE ORDER OF AHEPA

FALL 1981

AHEPAN

MARKUAS, PETER M
7 EAST LAYE AVE
BALTIMORE MD

02-704-101973-01

3 0 4 0 3 B 4 7 2 1 2 6

Supreme President Gustav Coffinas
The First 40 Days



AHEPA Convention Exceeds Expectations

In spite of an American air controllers strike and sympathy slow-downs from Canadian air controllers, over 8,000 Ahepans traveled to Toronto, Canada, for the 59th Supreme Convention from August 8-15. Highlights of the convention week included reaching the \$1,000,000 fund drive goal for the new AHEPA Hall for Boys at St. Basil's Academy, and the unanimous election of the new AHEPA Supreme Lodge, headed by prominent Brooklyn attorney Gustav Coffinas.

The convention officers elected Monday were: Philip Frangos, of Lansing, MI, Convention Chairman; John Cholakis, Albany, NY, Convention Vice-Chairman; and Lambros Svingos, Huntington, WV, Convention Secretary.

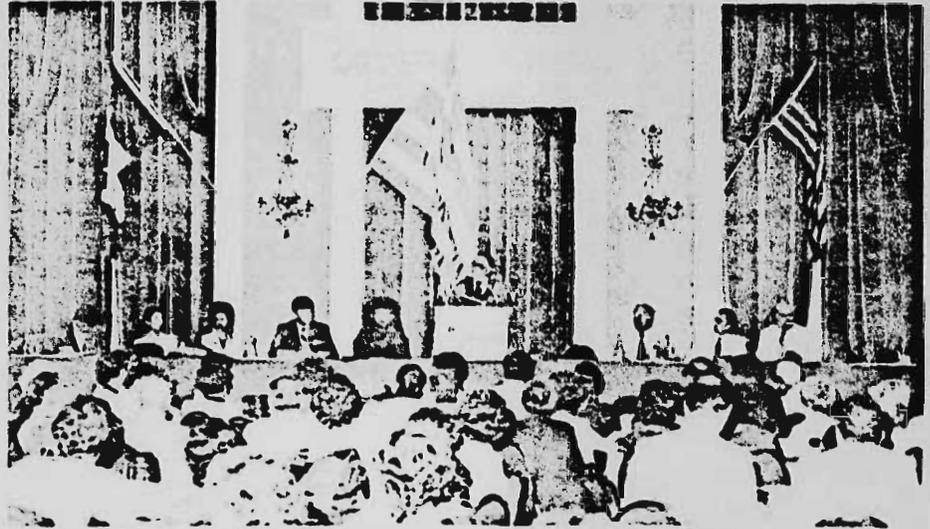
The social events were well-attended, and a full athletic program was conducted. The Daughters Fashion Show was stunning, and over 1,000 women viewed the dynamic designs of Zoe, a Toronto fashion designer.

During an AHEPA Hall for Boys luncheon on August 11 over \$80,000 was pledged toward the establishment of a Hall for Boys maintenance fund. The fund will be used for future repairs and upkeep on the three new dormitories that will be completed by this October. Louis G. Manesiotis, the fund drive chairman, has said that, "erecting these buildings has truly been AHEPA's finest hour."

On Thursday, August 13, the Grand Banquet heard speeches from the Right Honorable Joseph Clark, head of the Progressive Conservative Party of Canada; U.S. Senator Paul Sarbanes; His Eminence, Archbishop Iakovos; and Supreme President Nick Smyrnis, among others.

The last convention business session began on Friday morning and ended at 5 a.m. Saturday morning with the unanimous election of the new Supreme Lodge.

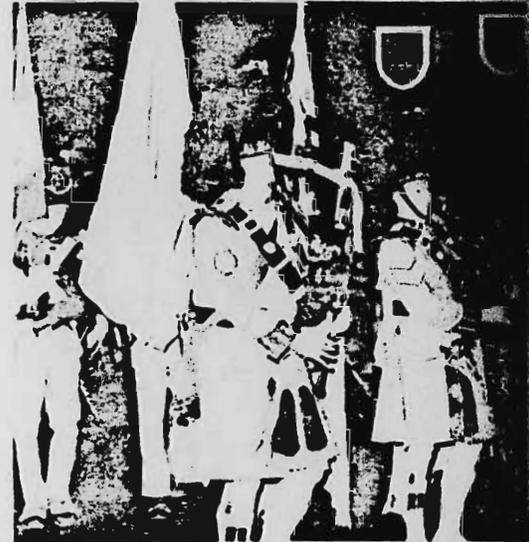
Elected were: Gus Coffinas, Brooklyn, NY, Supreme President; Peter Kouchalakos, Coral Gables, FL, Supreme Vice-President; James S. Anas, Burlington, Ontario, Canada, Supreme Vice President of



Supreme President Smyrnis addresses the welcoming ceremonies.



The Honorable Joseph Clark, leader of the opposition party in Canada, discussed the contributions of Greek immigrants to Canadian society.



The Color Guard at the Grand Banquet.

Canada; Nick C. Demeris, Houston, TX, Supreme Secretary; James Mazarakos, Springfield, MA, Supreme Treasurer; George Charles, Washington, DC, Supreme Counselor; George Drivas, Anaheim, CA, Supreme Governor; John Economou, Akron, OH, Supreme Governor; Mike Giannirakis, Weirton, WV, Supreme Governor; Nick Jannetides, Indianapolis, IN, Supreme Governor; George Athens, Denver, CO, Supreme Governor; Harry J. Pulos, Detroit, MI, Supreme Governor; Monthe N. Kofos, Marlboro, MA, Supreme Athletic Director.

The Daughters of Penelope elected Sonja Stefanadis of Clearwater, FL, as Grand President.

Other officers elected include: Maria Spirtos, Los Angeles, CA, Grand Vice-President; Elaine Kevgas, Lawrence, MA, Grand Secretary; Thalia Banis, Oakland, CA, Grand Treasurer; Lillian Demitry, Trenton, NJ, Grand Governor; Cleo Laras, Middleton, OH, Grand Governor; Anna Rakus, Seattle, WA, Grand Governor; Julia Constantine, Chicago, IL, Grand Governor; Anne Mountanos, San Francisco, CA, National Advisor, Maids of Athena.

The Sons of Pericles elected Chris Chiamas of Fresno, CA, Supreme President; Dean N. Pappas, Chicago, IL, Supreme Vice President; Peter A. Pappas, Charlotte, NC, Su-

8 3 0 4 0 3 8 4 7 1 7



From Saturday to Saturday, the dancing never stopped . . .



AHEPA Honors Cachules



Sam Cachules, President of the Atlantic Bank of New York City, was honored at the Grand Banquet by then Supreme Vice-President Gus Coffinas. Coffinas said that the award was given to Cachules "to recognize the many contributions he has made to the Order of AHEPA, to the Hellenes, and to mankind everywhere."

The plaque read:

To Soterios N. Cachules,

In recognition of his numerous contributions to educational, civic and humanitarian causes:

His professional success is worthy of respect,

His philanthropy is worthy of emulation.

August 13, 1981.

In thanking the Ahepans for the award, Cachules said: "I humbly accept this from the Order of AHEPA. What I have done, I have done from a love the Atlantic Bank and I have for the Order of AHEPA and for the Greek community in the United States and Canada. Thank you all."



This year's fashion show can be described in one word—Zoe. The designs of Zoe of Toronto were as beautiful as the models that wore them. When Greek-born Zoe Cokkinos came on the runway after the show in her simple black skirt and white blouse, she was as chic as any of her models in their thousand-dollar outfits.

preme Secretary; Peter Bissias, La Canada, CA, Supreme Treasurer; Sam Rine, North Chelmsford, MA, Supreme Governor; George Petrakakis, Patterson, NJ, Supreme Governor; Andrew Kanel, Elmhurst, IL, Supreme Governor.

The Maids of Athena elected Sandy Tarabicos of Wilmington, DE, as Grand President.

Other officers elected include: Daphne Papamichael, Washington, DC, Grand Vice-President; Eleni Boyadjis, Philadelphia, PA, Grand Secretary; Kukla Andros, St. Petersburg, FL, Grand Treasurer; Anne Chresanthakes, Wilmette, IL, Grand Governor; Joanne Tsatis, Worcester, MA, Grand Governor.



A Hellenic Renaissance

The following are excerpts from the address of Supreme President Nick Smyrnis at the convention Grand Banquet on August 13.

For the past two years you have given me a front row seat in the life of this great order. During this time I have experienced the AHEPA on every level—international, national, district, and chapter. I have come to understand not only what the AHEPA means to Presidents and Prime Ministers, but to the retired seamstress in Chicago, to the young college graduate in California, and to the successful restaurateur in Cincinnati or here in Toronto.

The past of our people is rooted in the great waves of immigration here in the early 1900's. However, the greatness of our forefathers, I believe, has yet to be truly recognized.

In the beginning they travelled thousands of miles crammed into ships with hundreds of other immigrants, and often had to huddle against the ship's hull to protect against the cold mist and icy winds. One person's disease would spread like wildfire on a parched desert plain, and often entire ships were quarantined and returned to Europe, their human baggage now not only poorer, but diseased as well.

Those who did enter the new world came penniless, not speaking the English language, and constantly facing the spectre of rejection and discrimination.

In the industrial marketplace, the immigrants offered their hard work, long hours, and the desire to succeed. But the Greeks also came here historically and culturally rich. In struggling to survive, they were armed with a secret weapon, a part of their personality that has been passed on from one generation of Hellene to another. Hellenic pride was the immigrants' great asset and most precious possession. The Greek is by nature a giver, not a taker. During the great depression, for example, the Greek immigrant learned that "Government relief" meant what *others* would take from the Government—not he, however. His *philotimo*, or sense of honor was much too big. This is a part of our Hellenic tradition.

Although the AHEPA was formed in Atlanta, Georgia, by eight young men in 1922, it is more appropriate to say, simply, that it was an idea whose time was overdue. The AHEPA began when most Greeks realized that they would remain in their adopted lands; that their children and grandchildren were not Greeks living abroad, but Canadians and Americans of Hellenic heritage.

These so-called AHEPA old-timers built the churches for our Hellenic rites of passage. They built schools to teach the Greek language to their children, for what Hellene does not understand the importance of language and communication? And they built the AHEPA as an organization and network to provide for the overall direction of our people.

It is not that we have failed, but that we have succeeded only too well. No longer do we have to integrate ourselves into these new societies . . . we are now an integral part of their makeup. We are elected to Parliament and Congress, we are Judges, Doctors, Scientists, Teachers, and every other occupation. We have not risen to the same education-

al level at the same rate as the rest of the society, we have far surpassed it.

Overcoming of our goals must not be seen as a disaster, however, but as a challenge. The new trails we must blaze in order to keep the AHEPA relevant will require as much courage, intelligence and perseverance as needed by the Hellenes in the early part of this century. We can no longer count on first generation Hellenes to invigorate our culture. It is now our responsibility to pass the mantle of leadership onto the children and grandchildren of our pioneers.

We will be facing a new environment. An environment as foreign and difficult as that faced by our forefathers. The life of the new world immigrant will never be repeated. Our children and grandchildren in many cases will never have the opportunity to attend Greek schools, and since we are not ghetto-ized, we will be unable to come in contact with many of the other Hellenes in our communities. Our increasing affluence might tend to let us forget those who are not so affluent. If we are not up to the task, our Hellenic days will be numbered.

I throw these out as possibilities, not certainties; as challenges, not forgone conclusions. If we maintain our Hellenic identity, it will not be because we have to, but because we *want* to. Not because of discrimination against us, but because of our desire to know who we are, "Know Thyself" . . . that is a part of our Hellenic tradition.

But I believe we are up to the challenge, the challenge of a renaissance, a Hellenic renaissance in North America. These past two years, I hope, have just been the beginning.

The Hellenes are an ancient and the noblest of people, and next year the AHEPA celebrates its 60th Anniversary. I am confident that in the years ahead, even though none of us in this room may live to see it, AHEPA will be celebrating its 100th, 150th, and 200th Anniversary—and our heritage will remain strong. I am confident of it because the preservation of our heritage, of its history, culture, and values, is the most essential aspect of our identity. That too, ladies and gentlemen, is a part of Hellenism.

Concluding, this is my last opportunity to address you as your Supreme President. Twice you have bestowed upon me the highest honor that can be granted by the Hellenes of North America to one of their ancestry—the Supreme Presidency of the Order of AHEPA.

I have written in this convention's yearbook, that on many occasions during the past two years my best may not have been good enough. My judgement may have differed from others. In my constant quest for excellence, I may have stumbled. In spite of my shortcomings, however, you have "walked beside me." You have shown me the way, and together—in harmony—we have succeeded.

The Poles have a salutation which fits this moment. When leaving one another, the one says, "Go with God"—the other replies "Remain with God." Until we meet again, stay well.

35040384719



MERCANTILE-SAFE DEPOSIT & TRUST COMPANY

We are CHARGING your account as per items below. Please see that the amount is deducted on your books so that our accounts may agree. FOR

DEPARTMENT International Dept. AUTHORIZED BY *Norman C. Decker*

Draft #51542 for C\$1,482.28 @ .8520 plus \$6.00 draft fee.

DATE 9/9/81

CHARGE Citizens For Sarbarnes P.O. Box 10644 Baltimore, Maryland 21204

ACCT. NO. 617195-8

\$ 1,268.90

AMOUNT

51542

MERCANTILE SAFE DEPOSIT AND TRUST BALTIMORE, MARYLAND

WHEN CORRESPONDING, PLEASE GIVE NUMBER AND NAME OF BANK AT LEFT.

September 9, 1981

AGAINST THIS CHECK

DER C.P. Hotels Royal York

AMOUNT ONE THOUSAND FOUR HUNDRED EIGHTY TWO AND 28/100 CANADIAN DOLLARS

Payable at Drawee's rate for sight drafts on New York if issued in U.S. Dollars

AMOUNT IN FIGURES C\$1,482.28

Canadian Imperial Bank of Commerce Toronto, Ontario, Canada

NON-NEGOTIABLE *Norman C. Decker* Authorized Signature *Patricia A. Wainman*

CHECK SOLD TO:

Citizens for Sarbarnes P.O. Box 10644 Baltimore, Maryland 21204

PURCHASER'S STATEMENT

Table with 5 columns: Rate, U.S.\$ Equivalent, Comm., Air Mail, Total. Row 1: .8520, \$1,262.90, \$6.00, , \$1,268.90

METHOD OF PAYMENT BY CUSTOMER

CHARGE TO ACCOUNT NO. 617195-8 () CHECK RECEIVED () CASH RECEIVED

WE CONFIRM SALE OF THIS CHECK DESCRIBED HEREIN, SUBJECT TO THE CONDITIONS PRINTED ON THE REVERSE SIDE, AND SUGGEST THAT THIS CHECK BE FORWARDED BY REGISTERED MAIL.

CUSTOMER RECEIPT

10/21/81

CITIZENS FOR SARBANES
Mr. Dean Challos
2327 Dirksen Building
WASHINGTON D.C. 20510

60025360

Covers - Nombre de Couverts
Date - Date
Wed. Aug. 12/81
Hour - Heure
Room - Salle
TERRITORIES

Quantity Quantite	BREAKFAST PETIT DEJEUNER	LUNCH DEJEUNER	RECEPTION RECEPTION	DINNER DINER	MEETING REUNION	Unit Price Prix Unitaire	Amount Montant
----------------------	-----------------------------	-------------------	------------------------	-----------------	--------------------	-----------------------------	-------------------

COFFEE / CAFE
MINERALS

LIQUOR / SPIRITUEUX
BEER / BIÈRE
WINE (RED) / VIN (ROUGE)
WINE (WHITE) / VIN (BLANC)
LIQUEUR

10% SALES TAX
15% GRATUITIES / POUR BOIRES

RENTAL

MISC.	SCREENS ECRAN	PROJECTORS PROJECTEUR	MICS MICROPHONE	FLIP CHARTS TABLEAU
-------	------------------	--------------------------	--------------------	------------------------

2 ³²
1 ⁵⁴
1 ²²

1027.70
52.36
115.00

118.60
178.00

VERIFIED

83040384721

REV. 4-81

Canadian Pacific Hotels Limited Société Hôtelière Canadien Pacifique Limitée

Imaging

Patron's Signature

TOTAL \$1482.00

CP Hotels
Royal York



100 Front Street West
Toronto, Ontario, Canada M5J 1E3
(416) 368-2511 Telex 085-23918

CANADIAN PACIFIC HOTELS LIMITED

CITIZENS FOR SARBANES
ATTN MR DEAN CHALLOS
2327 DIRKSEN BUILDING
WASHINGTON DC 20510

DATE AUG. 13, 1981 PAGE 1
ACCOUNT 6C025360 INVOICE

PLEASE DETACH TOP PORTION OF
THIS STATEMENT AND RETURN
WITH YOUR REMITTANCE

PLEASE DETACH AND RETURN WITH YOUR CHEQUE.
YOUR CANCELLED CHEQUE WILL BE A VALID RECEIPT.

DATE	VOUCHER ROOM/INVOICE	DESCRIPTION	DEBIT	CREDIT
01 08 12	009361	TERR RM FCTN	1,482.28	
	CURRENT	1,482.28		
			1,262.90	1,262.90
			16.00	
			1,246.90	
			7	
			6.00	
				6.00

83040384712

Max. Rental # 221 534

1,262.90
16.00
1,246.90
7
6.00
Change draft

THIS ACCOUNT IS NOW DUE AND PAYABLE.
PLEASE DISREGARD IF PAID SINCE STATEMENT DATE

PLEASE PAY THIS AMOUNT

1,482.28

OVERDUE BALANCES SUBJECT TO SURCHARGE
OF 1% PER MONTH OVER ONE MONTH.

Canadian Pacific Hotels Limited

J. OR MRS. JOHN BEKRAKIS
705-A RALEIGH CT 942-0593
BIRMINGHAM, AL 35209

8/12/ 1981 ⁸⁹²
81-118
620

PAY TO THE ORDER OF CITIZENS FOR SARBANES \$ 50⁰⁰

Fifty ⁵⁰ XX DOLLARS

 **CENTRAL BANK**
OF BIRMINGHAM
BIRMINGHAM, ALABAMA

John Bekrakis

FOR _____
⑆06 200 1186⑆ 178 5230 2⑈ 0892

ANDREAS A. BOYADJIS
ATTORNEY AT LAW
31 SOUTH STREET
MORRISTOWN, N. J. 07960

5331

55-7242
212

100⁰⁰

DOLLARS

The Morris County
Savings Bank 
MAIN OFFICE - MORRISTOWN, N.J. 07960

Andreas A. Boyadjis

⑆227 2724 26⑆ 012 158 2⑈

7
8
3
3
0
3
3
0
3
3
0

MARTIN MOTEL
LILLIAN CARO OR NICHOLAS C. CARO, M.D.
ROLLA, MISSOURI 65401

2012

PAY TO THE ORDER OF

Get my share for Automobile
and Automobile License No Costs
Aug 12 1981 ⁸⁰⁻¹⁰⁴ 815
\$ *25.00* DOLLARS



PHELPS COUNTY BANK
PH. 364-5202 Rolla, Missouri 65401

MARTIN MOTEL

For

By
Lillian Caro

⑈002012⑈ ⑆081501049⑆ 10 0888 9⑈

83040384722

MRS. MARY OR GEORGE J. CARAS
201 W. COLLEGE
MARION, ILL. 62959

531

PAY TO THE ORDER OF

Citizens for Suburban
Twenty Five Dollars
Aug 12 1981 70-2259 812
\$ *25.00* DOLLARS



BANK OF EGYPT

MARKET, EGYPT

MEMO

Mary Caras

⑆081222593⑆ ⑆145 529 3⑈

C. L. CHIPOKAS

P. O. BOX 4848
CEDAR RAPIDS, IOWA 52407

3561

PAY TO THE ORDER OF

Citizens for Suburban
Twenty-five and
8-12 1981 x ⁴⁷⁻¹ 739 0
\$ *25.00* DOLLARS

Merchants National Bank

Cedar Rapids, Iowa 52401



C. L. Chipokas

MEMO

⑆073900014⑆ 148188527⑈ 3561

70-2129
719

(PLACE) (DATE) 1981

PAY TO THE ORDER OF Citizens for Sincere OR TO BEARER IF NONE SPECIFIED, UPON DEMAND IN U.S. MONEY.

Dollars and 100ths \$ 10.00

WHICH SUM IS COLLECTIBLE IN THE UNITED STATES AT PAR (IN FULL) THROUGH THE FEDERAL RESERVE BANK OF CHICAGO, ILLINOIS, OR IN ANY OTHER COUNTRY IN ITS CURRENCY AT THE CURRENT BUYING RATE FOR UNITED STATES DOLLARS.

CITIZENS
BANK & TRUST COMPANY
PARK RIDGE (CHICAGO 26886) ILLINOIS

REGISTERED ACCT. NO. BY T. P. OR BETTY S. DIONISOS

SIGNATURE AND NUMBER TO CORRESPOND TO CURRENT UNITED SECURITY ACCOUNT CARD

⑆071921299⑆ 5⑈47629 8⑈

1208

NICHOLAS D. MATSAKIS, D.D.S.
MRS. N. MATSAKIS
1410 JAMAICA CT. 314 - 966-2669
ST. LOUIS, MO. 63122

Acq. 14 1981 4-98
810

PAY TO THE ORDER OF Citizens for Sincere \$25.00

Twenty five and no/100 DOLLARS

 **SOUTHWEST BANK**
ST. LOUIS, MISSOURI 63139

MEMO Nicholas Matsakis D.D.S.

⑆0810⑈0098⑆ ⑈13387 6⑈

ASPASIA M. MITCHELL
E. PETER MITCHELL
17 MITCHELL DRIVE
NIANTIC, CT 06357
OKEMO VILLAGE
LUDLOW, VT 05149

130

Aug 16 1981 51-1
111

PAY TO THE ORDER OF Citizens for Sincere \$100.00

One Hundred and no/100 DOLLARS

 **First Bank**
68 Boston Post Rd.
Waterford
Connecticut 06385

Ch. S. King

⑆00012⑆ 15180568⑈ 0130

83040384725

HELEN PAPPAS

4905 LINDELL

ST. LOUIS, MO. 63108

557

8-12 1981

4-128
810

PAY TO THE
ORDER OF

Citizen for Savings

\$ 50.00

Fifty and no/100

DOLLARS



CITY BANK

4825 Lindell boulevard
saint louis, missouri 63108

Helen Pappas

MEMO

⑆010810012801⑆ 3 46 492 2⑈ 0557



Merrill Lynch Cash Management Account*

273

STEVEN N. PAPPAYLIOU

ANGELA S. PAPPAYLIOU

34 HORIZON AVENUE

OCEANPORT, NJ 07757

Aug. 13 1981 25-60
440

Pay to the
order of

Citizen for Savings

\$ 60.00

Sixty & no/100

Dollars

BANK ONE.



BANK ONE OF COLUMBUS, NA
Columbus, Ohio 43215

Steven Pappayliou

Memo

⑆000273⑈⑆ ⑆044000804⑆ 3012143937⑈

LEON OR JOHANNA SPANOS

514 MEDINA DR.

ST. LOUIS, MO 63122

6208

70-16
810

PAY TO THE
ORDER OF

Citizen for Savings

Two Hundred and no/100

DOLLARS



first illinois bank

P.O. Box 459
East St. Louis, IL 62202

Leon Spanos

MEMO

⑆081000168⑆ 40 0657 3⑈ 6208

3304

JOHN KALFAS
THERESA KALFAS

No. 3066

1-32
280

Pay to the
order of

\$ 25.00

Dollars

National Bank of North America 18

1180 GRAND AVE., SOUTH HEMPSTEAD, N. Y. 11350

Memo

⑆028000325⑆718⑆0117 5596⑆

STEPHEN S. SCOPAS
136-56 - 39TH AVENUE
FLUSHING, NY 11354

0300

1-2/210/108

PAY TO THE
ORDER OF

8/31 1981

\$ 100.00

DOLLARS



The Chase Manhattan Bank, N.A.
Northern Blvd. & Little Neck Pkwy.
Little Neck, N.Y. 11363

⑆005305⑆ ⑆02100002⑆ 108 1 025270⑆

384727

DATE	AMOUNT	REMARKS

100
Stephen S. Scopas

80-848
214

DATE 10-18-81

No. 75649



THE
OYSTERMEN'S BANK
AND TRUST COMPANY
KEY BANK
SAYVILLE • NEW YORK

PAY
TOYSTERMENS
BK. & TR. CO. **\$100 AND 00 CTS**

TO THE
ORDER
OF

Citizens for Sorbanes

NOT VALID OVER \$1,000.00

P. Jantet
SIGNATURE

179 Sycamore ave
ADDRESS C. Jay. 112

⑈075649⑈ ⑈02140846⑈ ⑈906999993⑈

83040384728

GEORGE L. JANETAKOS
9727 Mt. Pisgah Road, No. 512
Silver Spring, Maryland 20903
301-434-7406

1077

August-12-1981

Pay to the order of Citizens for Sorbanes \$ 100⁰⁰/₁₀₀

One hundred ⁰⁰/₁₀₀ Dollars

maryland national bank
BETHESDA, MARYLAND 578

Memo Campaign contribution George L. Janetakis

⑈055003272⑈ ⑈1077⑈ ⑈0953066115⑈

CITIZENS FOR SARBANES

P.O. Box 10644
Baltimore, Md. 21204

Nº 1406 P

Campaign Contribution Receipt

To: _____

Occupation _____ Business Name _____

Business Address _____

Cash Check Contribution in kind Ticket

\$ _____ Treasurer/Subtreasurer

83040584729

u/p



CITIZENS FOR SARBANES

P.O. Box 10644
Baltimore, Md. 21204

No 1393 P

Campaign Contribution Receipt

To:

August 20, 2001

Occupation _____ Business Name _____

Business Address _____

Cash Check Contribution in kind Ticket

\$ _____

Treasurer/Subtreasurer

83040384730

CITIZENS FOR SARBANES

P.O. Box 10644
Baltimore, Md. 21204

No 1394 P

Campaign Contribution Receipt

To:

August 20, 2001

Occupation _____ Business Name _____

Business Address _____

Cash Check Contribution in kind Ticket

\$ _____

Treasurer/Subtreasurer



83040584731

63040384732



VENABLE, BAETJER, AND HOWARD
ATTORNEYS-AT-LAW
1800 MERCANTILE BANK & TRUST BUILDING
2 HOPKINS PLAZA
BALTIMORE, MARYLAND 21201

CMK

TO:

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

FIRST CLASS MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: DECEMBER 16, 1982
SUBJECT: MUR 1499 - First General Counsel's Report
dated December 15, 1982; Received in OCS,
12-15-82, 11:20

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, December 15, 1982.

There were no objections to the First General Counsel's Report at the time of the deadline.

83040684713



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1982

MEMORANDUM TO: Marjorie Emmons'
FROM: Steven Barndollar
SUBJECT: MUR 1499

Please have the attached First General Counsel's Report distributed to the Commission on a 24 hour no-objection basis. Please circulate this as a sensitive matter. Thank you.

Attachment

83040384734

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

82 DEC 15 All: 20

DATE AND TIME OF TRANSMITTAL BY
OGC TO THE COMMISSION 12/15/82

MUR NO. 1499
STAFF MEMBER
Conley Edwards, Jr.

COMPLAINANT'S NAME: Lawrence J. Hogan
RESPONDENTS' NAMES: Senator Paul S. Sarbanes
Citizens for Sarbanes
RELEVANT STATUTE: 2 U.S.C. § 441e
INTERNAL REPORTS CHECKED: Committee Reports
FEDERAL AGENCIES CHECKED: None

SENSITIVE

SUMMARY OF ALLEGATIONS

Complaint alleges that Senator Paul S. Sarbanes and Citizens for Sarbanes (hereinafter "the Committee") violated 2 U.S.C. § 441e "...by unlawfully soliciting and receiving political contributions from foreign nationals."

FACTUAL AND LEGAL ANALYSIS

On October 26, 1982, the Commission received a formal complaint from Lawrence J. Hogan alleging violations of the Act by Senator Paul S. Sarbanes and Citizens for Sarbanes, his principal campaign committee. Mr. Hogan and Mr. Sarbanes were candidates for election to the United States Senate from the State of Maryland. See Attachment I.

Specifically, on September 9, 1981, the complaint alleges that the Committee sponsored a reception 1/ in Toronto, Ontario,

1/ The Committee's 1981 Year End Report reveals a disbursement of \$1,268.90 to C.P. Hotel Royal York for a reception in September, 1981.

83040684735

Canada that was in fact a fundraiser to solicit campaign funds from foreign nationals. See Attachment II. The complaint states: "[I]t has been the practice of this Committee to term fundraisers as "receptions"; however, no additional evidence to support these allegations has been provided by the complainant.

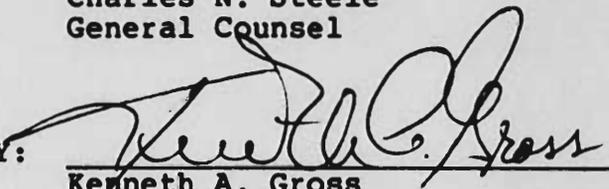
On October 29, 1982, letters and copies of the complaint were mailed to the Respondents.

On December 9, 1982, this Office communicated with the Committee's counsel, who informed us that an answer refuting the allegations in this matter will be provided by Wednesday, December 15, 1982.

We will make the appropriate recommendations upon receipt of the Committee's response to the complaint.

Charles N. Steele
General Counsel

December 14, 1982
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

Attachments I - II

33040384736

HOGAN FOR SENATE

POST OFFICE BOX 545
SEABROOK, MARYLAND 20706

62 OCT 26 P 11: 23

2 00122 11: 47

October 25, 1982

Mr. Frank Reiche
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Chairman Reiche:

I am hereby filing this complaint against Paul S. Sarbanes, a candidate for the office of U.S. Senator from Maryland, and Citizens for Sarbanes, 1800 Mercantile Bank and Trust Building, No. 2 Hopkins Plaza, Baltimore, Maryland 21201, pursuant to 2 U.S.C., §437g, for violation of the Federal Election Campaign Act, 2 U.S.C. Section §441e, by unlawfully soliciting and receiving political contributions from foreign nationals.

On FEC report C-00029777, Citizens for Sarbanes, covering the period July 1981 to December 31, 1981 on page 5 of 5, Itemized Disbursements, there is an item: CP Hotel Royal York, 100 Front Street West, Toronto, Ontario, Canada M5J1E3 reception, September 9, 1981 in the amount of \$1,268.90. It has been the practice of this Committee to term fundraisers as "receptions". Thus, the Toronto affair was undoubtedly a fundraiser in the same category as other listed receptions on the report.

What funds were raised as a result of this "reception" can only be known by the Committee as over half of the individuals contributions in this report are not itemized. Since only citizens and permanent residents can contribute to a federal campaign, it is probable that the money raised by Senator Sarbanes at this Toronto fundraiser included illegal donations from foreigners.

I am asking that the Commission investigate the matter promptly by issuing a subpoena for the undisclosed donors to determine their citizenship or permanent residence status.

Sincerely,

Lawrence J. Hogan
Lawrence J. Hogan

Subscribed and sworn to before me this 25th day of October, 1982.

Barry S. Cott

(1)

ATTACHMENT I

83040304737

SCHEDULE B

ITEMIZED DISBURSEMENTS

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)

CITIZENS FOR SARBANES

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
IBM Products Center 100 E. Pratt Street Balto., Md. 21202	typewriter		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/16/81	1,105.39
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Linda Kline 5180 Pon Valley Bloomfield Hills, Mich. 48013	catering		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8/5/81	340.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Kogan 414 Water Street Balto., Md. 21202	printing	7/10/81	3,172.63
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	thru 12/7/81	
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MDDC Press Clips, Inc. 914 N. Charles Street Balto., Md. 21201	clipping service	7/22/81	
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	thru 12/7/81	2,769.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Martin's, Inc. Beltway & Security Blvd. Balto., Md. 21207	catering		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	7/1/81	7,555.15
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Peter Mountanis G.W. Streeter's 340 E. Ohio Street Chicago, Ill. 60611	catering (in-kind)		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12/30/81	250.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Nat'l. Comm. for an Effective Congress 505 C. Street, N.E. Washington, D.C. 20002	Research (in-kind)		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12/30/81	972.50
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C.P Hotel Royal York 100 Front Street West Toronto, Ontario Canada M5J1E3	reception		
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/9/81	1,268.90
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (fill page this line number only)			390,995.95

2



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 28, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: George Demougeot *GD*
SUBJECT: MUR 1499 - Expedited

Please have the attached Memo to the Commission distributed to the Commission on pink paper per expedited procedures. Thank you.

Attachment

03040584739



SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 OCT 28 P 3: 05

October 28, 1982

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel *KAG*

SUBJECT: MUR 1499 - EXPEDITED
Complaint received October 26, 1982

On October 26, 1982, the Commission received a formal complaint from Lawrence J. Hogan alleging violations of the Act by Senator Paul S. Sarbanes and Citizens for Sarbanes. The complaint alleges that Senator Sarbanes and Citizens for Sarbanes violated 2 U.S.C. § 441e "... by unlawfully soliciting and receiving political contributions from foreign nationals."

Specifically, the complaint asserts, that on September 9, 1981, Citizens for Sarbanes paid for a reception 1/ at the C.P. Hotel Royal York in Toronto, Canada. Furthermore, the complaint states that: "[I]t has been the practice of this Committee to term fundraisers as "fundraisers".

Letters and copies of the complaint have been mailed. Our office will present a report with the appropriate recommendations to the Commission upon receipt of the responses from the persons involved in this matter.

1/ Citizens for Sarbarne's 1981 Year End Report does disclose a disbursement of \$1,268.90 to C.P. Hotel Royal York for a reception on September 9, 1981.

83040384710



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 29, 1982

Mr. Lawrence J. Hogan
Hogan for Senate
P.O. Box 545
Seabrook, MD 20706

Dear Mr. Hogan:

This letter is to acknowledge receipt of your complaint of October 25, 1982, against Citizens for Sarbanes and Senator Paul Sarbanes which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Steven Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure

83040384741



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 29, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Citizens for Sarbanes
1800 Mercantile Bank and Trust Building
No. 2 Hopkins Plaza
Baltimore, MD 21202

Re: MUR 1499

Dear Sir/Madam:

This letter is to notify you that on October 26, 1982, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1499. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

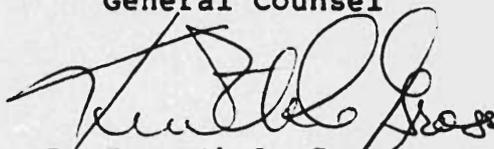
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

83040384712

If you have any questions, please contact Conley Edwards, Jr., the staff member assigned to this matter at (202) 523-4073. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

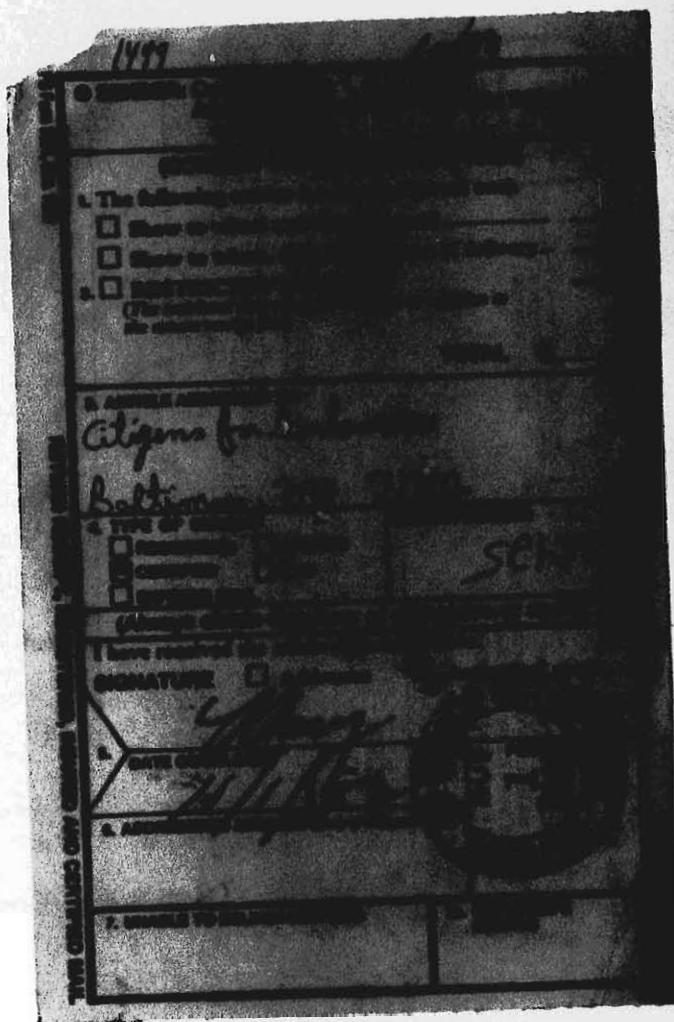


By Kenneth A. Gross
Associate General Counsel

63040384713

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement



1979

The following...

Show to...

Show to...

...

Citizens for...

Baltimore...

Signature

DATE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 29, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Paul S. Sarbanes
United State Senate
Washington, D.C. 20515

Re: MUR 1499

Dear Senator Sarbanes:

This letter is to notify you that on October 26, 1982, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1499. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

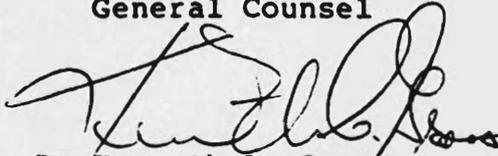
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

83040384714

If you have any questions, please contact Conley Edwards, Jr., the staff member assigned to this matter at (202) 523-4073. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

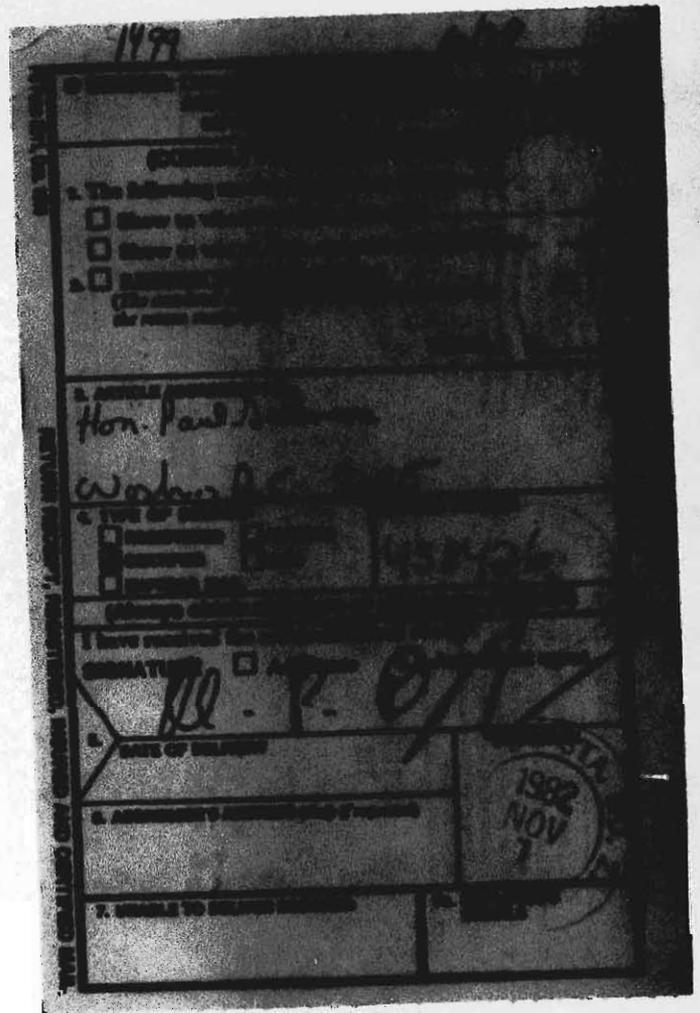


By Kenneth A. Gross
Associate General Counsel

83040384719

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement



1179

Hon. Paul [illegible]
[illegible]

1982 NOV 7

cc# 8776

HOGAN FOR SENATE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

32 OCT 28 P 1: 47

POST OFFICE BOX 545
SEABROOK, MARYLAND 20706

82 OCT 28 P 11: 23

October 25, 1982

Mr. Frank Reiche
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Chairman Reiche:

I am hereby filing this complaint against Paul S. Sarbanes, a candidate for the office of U.S. Senator from Maryland, and Citizens for Sarbanes, 1800 Mercantile Bank and Trust Building, No. 2 Hopkins Plaza, Baltimore, Maryland 21201, pursuant to 2 U.S.C., §437g, for violation of the Federal Election Campaign Act, 2 U.S.C. Section §441e, by unlawfully soliciting and receiving political contributions from foreign nationals.

On FEC report C-00029777, Citizens for Sarbanes, covering the period July 1981 to December 31, 1981 on page 5 of 5, Itemized Disbursements, there is an item: CP Hotel Royal York, 100 Front Street West, Toronto, Ontario, Canada M5J1E3 reception, September 9, 1981 in the amount of \$1,268.90. It has been the practice of this Committee to term fundraisers as "receptions". Thus, the Toronto affair was undoubtedly a fundraiser in the same category as other listed receptions on the report.

What funds were raised as a result of this "reception" can only be known by the Committee as over half of the individuals contributions in this report are not itemized. Since only citizens and permanent residents can contribute to a federal campaign, it is probable that the money raised by Senator Sarbanes at this Toronto fundraiser included illegal donations from foreigners.

I am asking that the Commission investigate the matter promptly by issuing a subpoena for the undisclosed donors to determine their citizenship or permanent residence status.

Sincerely,
Lawrence J. Hogan
Lawrence J. Hogan

Subscribed and sworn to before me this 25th day of October, 1982.

Cecelya A. Pratt

7/1/86

23040384716

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247
830403848

HOGAN FOR SENATE

POST OFFICE BOX 545
SEABROOK, MARYLAND 20706



Mr. Frank Reiche
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

82 OCT 26 AM 11:58



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1499

Date Filmed 4/22/83 Camera No. --- 2

Cameraman SPC

Best of luck to all who are running for office in 1984