

MICHAEL J. SCHROEDER

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July 26, 2004

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR # 5497

RECEIVED
FEDERAL ELECTION
COMMISSION
JUL 30 10:53 AM '04
FEDERAL
OFFICE

Dear Counsel:

My name is Michael J. Schroeder and my address is set forth above. I am filing a complaint against *Stabenow for Senate* (C00344473) at PO BOX 4945, EAST LANSING, MI 48826, Treasurer Angela M. Autera and *Citizens for Sarbanes* (C00029777) at P.O. BOX 26222, BALTIMORE, MD 21210, Treasurer Sebastia Svolos for accepting illegal soft money donations from *Friends of Lou Papan*, a California State Assembly committee that accepts donations from corporations and at levels in excess of Federal contribution limits. Furthermore, *Citizens for Sarbanes* improperly listed the contribution from *Friends of Lou Papan* as being from Mr. Papan, an individual, rather than a political committee while *Stabenow for Senate* did not list any Employer or Occupation information. These allegations are all based on public information filed with both the FEC and California's Fair Political Practices Commission (FPPC) and available on the Internet.

There are three contributions listed from the *Friends of Lou Papan* committee to Federal candidates: a \$250 contribution on May 15, 2003 to *Stabenow for Senate*, listed on page 103 of an amended FEC Form F3 July Quarterly filed on 1/30/2004 for the period ending June 30, 2003; a \$500 contribution on January 15, 2004 to *Citizens for Sarbanes*, listed on page 10 of an FEC Form F3 April Quarterly filed on April 15, 2004; and a \$250 contribution on January 15, 2004 to *Citizens for Sarbanes*, listed on page 11 of an FEC Form F3 April Quarterly filed on April 15, 2004. I have attached copies for your convenience.

The State of California also records these improper donations. *Friends of Lou Papan* (CA ID # 1245711), 215 Loyola Drive, Milbrae, California 94030, Treasurer Victor G. Kyriakis filed a report with the California Secretary of State's office on July 12, 2004, showing the illegal contributions to *Citizens for Sarbanes* while the contribution to *Stabenow for Senate* was reported to the California Secretary of State's office on July 11, 2003. I have attached copies for your convenience.

25190260546

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 10 OF 17
(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d	<input type="checkbox"/> 15
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14	<input type="checkbox"/> 15

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 (Last, First, Middle Initial)
Kate Moss

Mailing Address
1626 Foxhall Road, N.W.
City: Washington State: DC Zip Code: 20007

FEC ID number of contributing federal political committee: **C**

Name of Employer: Kate Moss Company Occupation: President

Receipt For:
 Primary General
 Other (specify) _____

Election Cycle-to-Date: **5 0 0 0 0**

Date of Receipt
03 / 01 / 2004

Amount of Each Receipt this Period
5 0 0 0 0

Limits Increased Due to Opponent's Spending (2 U.S.C. §441a)(441a-1)

B. Full Name (Last, First, Middle Initial)
Anthony Ontiveros

Mailing Address
345 Waterfield Drive
City: Roseville State: CA Zip Code: 95678

FEC ID number of contributing federal political committee: **C**

Name of Employer: Information Requested Occupation:

Receipt For:
 Primary General
 Other (specify) _____

Election Cycle-to-Date: **2 5 0 0 0**

Date of Receipt
01 / 15 / 2004

Amount of Each Receipt this Period
2 5 0 0 0

Limits Increased Due to Opponent's Spending (2 U.S.C. §441a)(441a-1)

C. Full Name (Last, First, Middle Initial)
Louis Papan - Friends of Lou Papan

Mailing Address
215 Loyola Drive
City: Millbrae State: CA Zip Code: 94030

FEC ID number of contributing federal political committee: **C**

Name of Employer: Retired Occupation:

Receipt For:
 Primary General
 Other (specify) _____

Election Cycle-to-Date: **7 5 0 0 0**

Date of Receipt
01 / 15 / 2004

Amount of Each Receipt this Period
5 0 0 0 0

Limits Increased Due to Opponent's Spending (2 U.S.C. §441a)(441a-1)

SUBTOTAL of Receipts This Page (optional) **1 2 5 0 0 0**

TOTAL This Period (last page this line number only) **1 2 5 0 0 0**

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**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER		PAGE 11 OF 17	
(check only one)			
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
12	13a	13b	14
			15

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 (Last, First, Middle Initial)
Louis Papan - Friends of Lou Papan

Mailing Address
215 Loyola Drive

City State Zip Code
Millbrae CA 94030

FEC ID number of contributing federal political committee
C

Name of Employer Occupation
Retired

Receipt For:
 Primary General
 Other (specify) ▼

Election Cycle-to-Date
7 5 0 0 0

Date of Receipt
01 / 15 / 2004

Amount of Each Receipt this Period
2 5 0 0 0

Limits Increased Due to Opponent's Spending (2 U.S.C. §441a(f)(441a-1))

B. Full Name (Last, First, Middle Initial)
James Pedas

Mailing Address
P.O. Box 9996

City State Zip Code
Washington DC 20016

FEC ID number of contributing federal political committee
C

Name of Employer Occupation
Circle Theatres Owner

Receipt For:
 Primary General
 Other (specify) ▼

Election Cycle-to-Date
5 0 0 0 0

Date of Receipt
01 / 08 / 2004

Amount of Each Receipt this Period
5 0 0 0 0

Limits Increased Due to Opponent's Spending (2 U.S.C. §441a(f)(441a-1))

C. Full Name (Last, First, Middle Initial)
Theodore Pedas

Mailing Address
P.O. Box 9996

City State Zip Code
Washington DC 20016

FEC ID number of contributing federal political committee
C

Name of Employer Occupation
Circle Theatres Owner

Receipt For:
 Primary General
 Other (specify) ▼

Election Cycle-to-Date
5 0 0 0 0

Date of Receipt
01 / 08 / 2004

Amount of Each Receipt this Period
5 0 0 0 0

Limits Increased Due to Opponent's Spending (2 U.S.C. §441a(f)(441a-1))

SUBTOTAL of Receipts This Page (optional) ... 1 2 5 0 0 0

TOTAL This Period (last page this line number only) ...

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Campaign Finance Activity

PAPAN, FRIENDS OF LOU

Election Cycle:

2003/2004 Session

Prior Sessions

FILER ID:

1245711

SUMMARY INFORMATION - PAPAN, FRIENDS OF LOU (ID# 1245711)

CURRENT STATUS	ACTIVE
LAST REPORT DATE THIS SESSION	07/12/2004
REPORTING PERIOD	01/01/2004 - 06/30/2004
CONTRIBUTIONS FROM THIS PERIOD	\$0.00
TOTAL CONTRIBUTIONS 1/1/2004 - 06/30/2004	\$0.00
EXPENDITURES FROM THIS PERIOD	\$7,254.62
TOTAL EXPENDITURES 1/1/2004 - 06/30/2004	\$7,254.62
ENDING CASH	\$64,915.61

View Information:

Contributions Made

<u>DATE</u>	<u>PAYEE</u>	<u>CONTEST</u>	<u>POSITION</u>	<u>PAYMENT TYPE</u>	<u>AMOUNT</u>
01/15/2003	NEWSOM FOR MAYOR	MAYOR	SUPPORT	MONETARY	\$500.00
02/14/2003	ROD WRIGHT FOR LOS ANGELES CITY COUNCIL	CITY COUNCIL MEMBER 10	SUPPORT	MONETARY	\$500.00
07/08/2003	ELAINE ALQUIST FOR STATE SENATE	STATE SENATOR 11	SUPPORT	MONETARY	\$500.00
09/25/2003	FRIENDS OF LINDA CARSON	CITY COUNCIL MEMBER	SUPPORT	MONETARY	\$500.00
01/09/2004	TASO FOR SAN MATEO COUNTY	COUNTY SUPERVISOR	SUPPORT	MONETARY	\$500.00
01/15/2004	CITIZENS FOR SARBANES COMMITTEE	OTHER 3rd	SUPPORT	MONETARY	\$500.00
04/18/2003	STABENOW FOR U.S. SENATE-C 00344473	OTHER	SUPPORT	MONETARY	\$250.00
07/28/2003	COMMITTEE TO ELECT LOU D'ALLESANDRO	STATE SENATOR	SUPPORT	MONETARY	\$250.00
01/15/2004	CITIZENS FOR SARBANES COMMITTEE	OTHER 3rd	SUPPORT	MONETARY	\$250.00
01/27/2004	COMMITTEE TO ELECT PETER LAGARIOS	OTHER	SUPPORT	MONETARY	\$250.00
01/15/2004	COMMITTEE TO RE-ELECT CAROLINE SHAE	OTHER	SUPPORT	MONETARY	\$70.00
09/18/2003	RE-ELECT COHN-LYLE & VRANES	OTHER	SUPPORT	MONETARY	\$50.00

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**Schedule D
(Continuation Sheet)
Summary of Expenditures
Supporting/Opposing Other
Candidates, Measures and Committees**

SCHEDULED (CONT.)
CALIFORNIA FORM 460

Statement covers period
from 01/01/2004
through 06/30/2004

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I.D. NUMBER
1245711

Type or print in ink.
Amounts may be rounded
to whole dollars.

NAME OF FILER
Friends of Lou Papan

DATE	NAME OF CANDIDATE, OFFICE, AND DISTRICT, OR MEASURE NUMBER OR LETTER AND JURISDICTION, OR COMMITTEE	TYPE OF PAYMENT	DESCRIPTION (IF REQUIRED)	AMOUNT THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN 1 - DEC 31)	PER ELECTION TO DATE (IF REQUIRED)
1/15/2004	Payee Name Citizens for Sarbanes Committee Candidate Name Paul S Sarbanes U S Senator District 3rd Jurisdiction 3rd Congressional District	<input checked="" type="checkbox"/> Monetary Contribution <input type="checkbox"/> Non-Monetary Contribution <input type="checkbox"/> Independent Expenditure		\$250 00	\$750 00	
	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose					
1/15/2004	Payee Name Citizens for Sarbanes Committee Candidate Name Paul S Sarbanes U S Senator District 3rd Jurisdiction 3rd Congressional District	<input checked="" type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure		\$500 00	\$750 00	
	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose					
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose					
	<input type="checkbox"/> Support <input type="checkbox"/> Oppose					
SUBTOTAL				\$1,570 00		

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**Schedule D
Summary of Expenditures
Supporting/Opposing Other
Candidates, Measures and Committees**

Type or print in Ink.
Amounts may be rounded
to whole dollars.

SCHEDULE D
CALIFORNIA
FORM 460

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER
Friends of Lou Papan

Statement covers period
from 01/01/2003
through 06/30/2003

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ID NUMBER
1245711

DATE	NAME OF CANDIDATE, OFFICE, AND DISTRICT, OR MEASURE NUMBER OR LETTER AND JURISDICTION, OR COMMITTEE	TYPE OF PAYMENT	DESCRIPTION (IF REQUIRED)	AMOUNT THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN 1 - DEC 31)	PER ELECTION TO DATE (IF REQUIRED)
1/15/2003	Payee Name Newsom for Mayor Candidate Name Gavin Newsom Mayor Jurisdiction San Francisco County <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	<input checked="" type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure		\$500 00	\$500 00	
2/14/2003	Payee Name Rod Wright for Los Angeles City Council Candidate Name Rod Wright City Council Member District 10 Jurisdiction Los Angeles <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	<input checked="" type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure		\$500 00	\$500 00	
4/18/2003	Payee Name Stabenow for U S Senate-C 00344473 Candidate Name Debbie Stabenow U S Senate Jurisdiction Washington, D C <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose	<input checked="" type="checkbox"/> Monetary Contribution <input type="checkbox"/> Nonmonetary Contribution <input type="checkbox"/> Independent Expenditure		\$250 00	\$250 00	
SUBTOTAL				\$1,250 00		

Schedule D Summary

- Contributions and independent expenditures made this period of \$100 or more. (Include all Schedule D subtotals.) \$1,250.00
- Unitemized contributions and independent expenditures made this period of under \$100 \$0.00
- Total contributions and independent expenditures made this period. (Add Lines 1 and 2. Do not enter on the Summary Page.) **TOTAL \$1,250.00**