

Denise Cardinal
c/o Alliance for a Better Minnesota
1600 University Ave.
Suite 309B
Saint Paul, MN 55104

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

To Whom It May Concern:

This letter is a complaint, filed by Denise Cardinal (address above), a citizen of the United States residing in Minnesota, to report that U.S. Senator Norm Coleman is violating Federal Election Commission regulations as they relate to the use of campaign accounts for non-campaign purposes (11 CFR 113.1).

The federal code states that:

Personal use means any use of funds in a campaign account of a present or former candidate to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate's campaign or duties as a Federal officeholder.

Code also states that:

The Commission will determine, on a case-by-case basis, whether other uses of funds in a campaign account fulfill a commitment, obligation or expense that would exist irrespective of the candidate's campaign or duties as a Federal officeholder, and therefore are personal use. Examples of such other uses include....Legal expenses

Recent reports indicate that the FBI has opened an investigation into allegations contained within two lawsuits that a donor of Senator Norm Coleman's tried to funnel a series of \$25,000 payments to him through his wife, Laurie Coleman. These actions are reported in the lawsuits, though Senator Coleman and his wife are not named as defendants.

In response to these reports and the investigation, Sen. Coleman has retained the services of several lawyers. To pay the legal fees, Sen. Coleman has begun to use campaign contributions, labeling these allegations within the suits as "politically motivated". Such a label, we contend, is wholly inaccurate given the facts surrounding suits containing the allegations against Senator Coleman and