Allan Silberman
04/23/2001 03:53 PM

To "FLODINE, JIM" <jflodine@OmahaState.com>
cc

Subject Re Contribution to Bob Kerrey for US Senate Committee is violation o f FEC laws case ~~ADR 042~~ ADR CX 43

Thank you for your note responding to my letter of April 16, 2001 On November 8, 1999, the FEC was notified by the Accountability and Disclosure Commission of the State of Nebraska that the Omaha State Bank, through Michael Dahir, made a contribution to Bob Kerrey for US Senate Committee The contribution appears to have been made on 10/29/99 According to Commission records, the contribution was refunded on 11/2/99 As you are aware, banks are prohibited from contributing to candidates running for elected federal office Title 2 (Federal Election Campaign Act) section 441b of the Act prohibits such contributions

I appreciate your interest in rectifying this situation and addressing future considerations for the Bank Although such violations are a serious matter, I do not anticipate a major problem in resolving this matter.

The purpose of the FEC's ADR office is to facilitate resolution of such matters to the mutual satisfaction of both sides If you will sign and return the ADR Commitment form, I will be back in touch so we can wrap this matter up quickly while addressing all the concerns for OSB