



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2987

DATE FILMED 2/7/91 CAMERA NO. 4

CAMERAMAN AS

21040322445

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: June 19, 1989

ANALYST: Pat Sheppard

I. COMMITTEE:

Committee to Re-Elect Senator Zorinsky
(C00032862)
Michael N. Abramson, Treasurer
(July 29, 1988-Present)
George J. Kubat, Treasurer
(January 1, 1987-July 28, 1988)
900 South 74th Plaza #400
Omaha, NE 68114

II. RELEVANT STATUTE: 2 U.S.C. §441a(a)(1)(A)

III. BACKGROUND:

Apparent Excessive Contributions Made to a Federal Candidate

The 1988 Mid-Year Report for the Committee to Re-Elect Senator Zorinsky ("the Committee") disclosed on Schedule B the disbursement of a contribution to the CeCe Zorinsky for Congress committee for \$3,500 on June 28, 1988 (Attachment 2). The Committee's 1988 Year End Report disclosed on Schedule B the disbursement of a contribution to the CeCe Zorinsky for Congress committee for \$9,000 on July 28, 1988 (Attachment 3). This resulted in apparent excessive contributions totalling \$11,500.^{1/} A Request For Additional Information ("RFAI") referencing both reports was sent to the Committee on May 9, 1989 (Attachment 4). The RFAI noted the disbursement of the apparent excessive contributions and requested the Committee to obtain a refund of the amount in excess of the \$1,000 per election limit. In addition, the RFAI noted the possibility of further Commission action concerning the disbursement of apparent excessive contributions.

^{1/} The contributions were not designated; however, in accordance with 11 CFR 110.1(b)(2)(ii), the Reports Analysis Division has attributed the contributions to the general election.

21040322446

COMMITTEE TO RE-ELECT SENATOR ZORINSKY
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On May 12, 1989 Mr. Michael Abramson ("the Treasurer") called and spoke to a Reports Analysis Division Analyst (Attachment 5). The Treasurer stated that he thought the funds had been sent into a trust fund for the candidate's widow. He said that he would request a refund of the excessive amount. The analyst asked the Treasurer if he was aware that since the late Senator Zorinsky was a member of Congress on January 8, 1980, the Committee could give all funds to his widow for her personal use. The Treasurer said he was aware of this but the widow had requested the Committee remain open. He said he would respond as soon as possible.

On May 18, 1989 the Committee responded in a letter (Attachment 6). The letter acknowledged the disbursement of the excessive contributions and noted that the Committee had requested a refund of the excessive amount. The response further noted that the activity would be disclosed on the July 31, 1989 Mid-Year Report.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

21040322447

FEDERAL ELECTION COMMISSION
1987-1988
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

Attachment# 1
Page 1 of 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILER
			PRIMARY	GENERAL	PRIMARY	GENERAL			

ZORINSKY, EDWARD SENATE DEMOCRATIC PARTY NEBRASKA 1982 ELECTION ID# S6NE00246

1. STATEMENT OF CANDIDATE
1986 STATEMENT OF CANDIDATE SNAR86 3 86SEN/006/2547

NOTE: THIS DOCUMENT WAS FILED WITH THE COMMISSION DURING A PREVIOUS ELECTION CYCLE. ADDITIONAL FINANCIAL ACTIVITY REPORTED BY THIS CANDIDATE MAY APPEAR ON INDICIES COVERING THAT EARLIER PERIOD

2. PRINCIPAL CAMPAIGN COMMITTEE

COMMITTEE TO RE-ELECT SENATOR ZORINSKY

ID #C00032862 SENATE

1987 MID-YEAR REPORT	18,084	8,382	1JAN87 -30JUN87	18 87SEN/007/0962
YEAR-END	5,000	2,948	1JUL87 -31DEC87	6 88SEN/004/1021
1988 STATEMENT OF ORGANIZATION - AMENDMENT			1AUG88	2 88SEN/014/1174
STATEMENT OF ORGANIZATION - AMENDMENT			9AUG88	3 88SEN/014/2872
MID-YEAR REPORT	5,180	5,597	1JAN88 -30JUN88	7 88SEN/014/1176
MID-YEAR REPORT - AMENDMENT	-	-	1JAN88 -30JUN88	7 89SEN/003/4023
REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -30JUN88	4 89FEC/594/4025
YEAR-END	-	-	1JUL88 -31DEC88	1 89FEC/596/2477
YEAR-END - AMENDMENT	-	-	1JUL88 -31DEC88	6 89SEN/007/0967
REQUEST FOR ADDITIONAL INFORMATION			1JUL88 -31DEC88	4 89FEC/594/4021

TOTAL 28,344 5,454 16,927 35,764 60 TOTAL PAGES

3. AUTHORIZED COMMITTEES

4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN

All Reports have been reviewed
Debts as of 12/31/88 - \$0
Cash on Hand as of 12/31/88 - \$139,891.57

2104022443

SCHEDULE B

ITEMIZED DISBURSEMENTS

1988 Mid Year Report

Attachment # 2

Page 1 of 1

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)

COMMITTEE TO RE-ELECT ZODINSKY

A. Full Name, Mailing Address and ZIP Code CECE ZODINSKY FOR CON-125 9531 HICKORY ST. OMAHA, NE. 68124	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☒ Other (specify) <u>HOUSE ACTIVITY</u>	Date (month, day, year) 6-28-88	Amount of Each Disbursement This Period 3,500.00
B. Full Name, Mailing Address and ZIP Code 	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code 	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code 	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code 	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code 	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code 	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code 	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code 	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			3,500.00
TOTAL This Period (last page this line number only)			3,500.00

83020141100

SCHEDULE B

ITEMIZED DISBURSEMENTS

1988 Year End Report

Attachment# 3

Page 1 of 1

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)

COMMITTEE TO RE-ELECT ROBINLY

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<u>LOUE ROBINLY FOR CONGRESS</u> <u>9531 422024 ST.</u> <u>OMAHA, NE. 68124</u>	Purpose of Disbursement <u>CONGRESSIONAL</u> Disbursement for ☐ Primary ☐ General ☒ Other (specify) <u>STATE OFFICE</u>	<u>7-27-88</u>	<u>9,000</u>
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

9,000.00

TOTAL This Period (last page this line number only)

9,000.00

5040322450



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

EO-2

MAY 9 1988

Michael W. Abramson, Treasurer
Committee to Re-Elect Senator Borinsky
900 South 74th Plaza #400
Omaha, NE 68114

Identification Number: C00032062

Reference: Mid-Year (1/1/88-6/30/88) and Year End (7/1/88-12/31/88) Reports

Dear Mr. Abramson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limit set forth in the Act. The Act precludes an individual or a political committee, other than a qualified multicandidate committee, from making a contribution to a candidate for Federal office in excess of \$1,000 per election. (2 U.S.C. §441a(a))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution made was excessive, you should notify the recipient and request a refund of the amount in excess of \$1,000. You should inform the Commission in writing of such a refund, and the refund should appear on Line 15 of the Detailed Summary Page and on Schedule A of the report covering the period in which the refund is received.

Although the Commission may take further legal steps, prompt action by you to obtain a refund of the excessive amount(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this

3 1 0 3 5 9 4 4 0 5 1

letter. If you need assistance, please feel free to contact me
on our toll-free number, (800) 626-9530. My local number is
(202) 376-2400.

Sincerely,

Pat Sheppard

Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

8 : 0 3 5 9 4 4 0 5 ?

MEMORANDUM TO FILES:

DATE May 12, 1989

TELECON X
VISIT

NAME OF COMMITTEE: Committee to Re-Elect Senator Zorinsky

SUBJECT: RFAI- Excessive Contributions

FEC REP: Pat Sheppard

COMMITTEE REP: Mike Abramson, Treasurer (402)397-8570

Mr. Abramson called to get some further information on contribution limits to other federal candidates. I explained the limits to him and also asked him if he was aware that the Committee could give all the funds to Mrs. Zorinsky personally. He stated that he was aware of that law but the widow had requested that the Committee remain open for a while longer. Mr. Abramson stated that he had thought that the funds had been sent to the widow's trust account. He said that he would request a refund of the excessive amount and provide an amended report as soon as possible.

91040322453

RECEIVED
SECRETARY OF THE
1989 MAY 19 PM 12
... BUREAU

RECEIVED
1989 MAY 18 AM 8:54

RECEIVED
1989 MAY 19 PM 12:42
HAND DELIVERED

May 15, 1989

Ms. Pat Sheppard
Federal Election Commission
999 E St. NW
Washington, DC 20463

RE: The Committee to Re-Elect Senator Zorinsky
ID No.: C000032862

Dear Pat:

This letter is in regard to your letter of May 9, 1989 concerning the mid-year and end-year reports for 1988.

The committee inadvertently dispersed \$12,500 to the CeCe Zorinsky for Congress Committee during the year. It was believed at that time that a political committee could contribute without limit to another political committee. Of course, we were mistaken. It is our intention to correct this mistake as soon as possible.

The following actions will take place to correct this problem:

1. The CeCe Zorinsky for Congress Committee will immediately refund all excess contributions (\$11,500) to the Committee to Re-Elect Senator Zorinsky; and
2. The excess contributions of \$11,500 will be paid out to Mrs. Edward Zorinsky or a trust for the benefit of Mrs. Edward Zorinsky shortly after the refund is received by our committee.

These actions will be documented on our mid-year report for 1989.

If you have any further questions regarding this matter or any other matters, please do not hesitate to contact me at your earliest convenience.

Yours very truly,



Michael N. Abramson
Treasurer for the Committee to Re-Elect Senator Zorinsky

MNA/fsw

9
0
0
3
4
0
6
9

ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: 9 August 1989

ANALYST: Karen White

I. COMMITTEE: Cece Zorinsky for Congress
(C00221358)
Edward A. Kohout, Treasurer
8531 Hickory Street
Omaha, NE 68124

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Acceptance of Apparent Excessive Contributions

The Cece Zorinsky for Congress committee ("the Committee") received apparent excessive contributions totalling \$11,500 from the Committee to Re-Elect Senator Zorinsky.

Schedule A of the Committee's 1988 July Quarterly and October Quarterly Reports disclose the receipts of contributions, designated for the primary election, from the Committee to Re-Elect Senator Zorinsky of \$3,500 on June 28, 1988 and of \$9,000 on July 28, 1988, respectively (Attachments 2 and 3). This resulted in apparent excessive contributions totalling \$11,500.

A Request for Additional Information ("RFAI") was sent to the Committee on May 24, 1989 (Attachment 4). The RFAI noted the receipt of the apparent excessive contributions and requested the Committee to refund the amount in excess of the \$1,000 per election limit. In addition, the RFAI noted the possibility of further Commission action concerning the receipt of apparent excessive contributions. A Second Notice was sent on June 15, 1989, for failure to respond to the RFAI (Attachment 5).

On July 11, 1989, Mr. Al Abramson, an agent for the Committee, called and spoke to a Reports Analysis Division (RAD) analyst (Attachment 6). Mr. Abramson called to see

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 9 August 1989

ANALYST: Karen White

I. COMMITTEE: Cece Zorinsky for Congress
(C00221358)
Edward A. Kohout, Treasurer
8531 Hickory Street
Omaha, NE 68124

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Acceptance of Apparent Excessive Contributions

The Cece Zorinsky for Congress committee ("the Committee") received apparent excessive contributions totalling \$11,500 from the Committee to Re-Elect Senator Zorinsky.

Schedule A of the Committee's 1988 July Quarterly and October Quarterly Reports disclose the receipts of contributions, designated for the primary election, from the Committee to Re-Elect Senator Zorinsky of \$3,500 on June 28, 1988 and of \$9,000 on July 28, 1988, respectively (Attachments 2 and 3). This resulted in apparent excessive contributions totalling \$11,500.

A Request for Additional Information ("RFAI") was sent to the Committee on May 24, 1989 (Attachment 4). The RFAI noted the receipt of the apparent excessive contributions and requested the Committee to refund the amount in excess of the \$1,000 per election limit. In addition, the RFAI noted the possibility of further Commission action concerning the receipt of apparent excessive contributions. A Second Notice was sent on June 15, 1989, for failure to respond to the RFAI (Attachment 5).

On July 11, 1989, Mr. Al Abramson, an agent for the Committee, called and spoke to a Reports Analysis Division (RAD) analyst (Attachment 6). Mr. Abramson called to see

9104 082 2455

CECE ZORINSKY FOR CONGRESS
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

if the Commission had received his 1988 October Quarterly amendment. It consisted of a letter from the Committee to Re-Elect Senator Zorinsky. The RAD analyst checked and found no record of an amendment filed with the Commission. Mr. Abramson stated that he would send in a copy right away.

On July 17, 1989, the Committee filed a response to the RFAI (Attachment 7). The response included a copy of a letter from Michael N. Abramson, treasurer for the Committee to Re-Elect Senator Zorinsky, that acknowledged the disbursement of the excessive contributions and requested a refund of the excessive amount.

On July 26, 1989, Mr. Al Abramson called and spoke to a RAD analyst (Attachment 8). Mr. Abramson stated that the Committee has not refunded the excessives. Mr. Abramson said that the Committee has no cash-on-hand and cannot pay back the money. He then wanted to know when he could terminate the Committee. The RAD analyst told him that he had to report until the debt was paid back.

Schedule B of the Committee's 1989 Mid-Year Report, filed on July 28, 1989, disclosed the refund of \$11,500 to the Committee to Re-Elect Senator Zorinsky on May 31, 1989 (Attachment 9).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

91040622456

FEDERAL ELECTION COMMISSION
1987-1988
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 8AUG89

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		DISBURSEMENTS		# OF	MICROFILM			
	OFFICE SOUGHT/	PARTY	PRIMARY	GENERAL	PRIMARY	GENERAL	COVERAGE DATES	PAGES	LOCATION
TYPE OF FILER									
ZORINSKY, CECILE	HOUSE 02 DEMOCRATIC PARTY		NEBRASKA		1988 ELECTION		ID# H8NE02097		
1. STATEMENT OF CANDIDATE					19JAN88		1 88HSE/339/4008		
1988 STATEMENT OF CANDIDATE									
2. PRINCIPAL CAMPAIGN COMMITTEE									
CECE ZORINSKY FOR CONGRESS					ID #C00221358		HOUSE		
1987 YEAR-END	.	27,575	11,812	4NOV87 -31DEC87	12 88HSE/341/3740				
YEAR-END	- AMENDMENT	27,575	-	4NOV87 -31DEC87	14 88HSE/345/2615				
YEAR-END	- AMENDMENT	27,575	-	4NOV87 -31DEC87	2 88HSE/345/2390				
YEAR-END	- AMENDMENT	-	-	4NOV87 -31DEC87	1 88HSE/345/4211				
YEAR-END	- AMENDMENT	-	-	4NOV87 -31DEC87	1 88HSE/345/4401				
REQUEST FOR ADDITIONAL INFORMATION				4NOV87 -31DEC87	4 88FEC/509/3475				
1988 STATEMENT OF ORGANIZATION				19JAN88	1 88HSE/339/4007				
48 HOUR CONTRIBUTION NOTICE				5MAY88	1 88HSE/350/1692				
APRIL QUARTERLY		73,726	83,719	1JAN88 -31MAR88	32 88HSE/349/0801				
APRIL QUARTERLY	- AMENDMENT	-	-	1JAN88 -31MAR88	2 88HSE/351/2097				
1'ST LETTER INFORMATIONAL NOTICE				1JAN88 -31MAR88	1 88FEC/524/4136				
PRE-PRIMARY		22,402	14,354	1APR88 -20APR88	14 88HSE/349/4999				
PRE-PRIMARY	- AMENDMENT	22,402	14,354	1APR88 -20APR88	8 88HSE/352/2081				
PRE-PRIMARY	- AMENDMENT	22,402	14,354	1APR88 -20APR88	8 88HSE/353/4426				
REQUEST FOR ADDITIONAL INFORMATION				1APR88 -20APR88	1 88FEC/528/2452				
REQUEST FOR ADDITIONAL INFORMATION 2ND				1APR88 -20APR88	2 88FEC/530/4498				
JULY QUARTERLY		24,236	35,688	21APR88 -30JUN88	18 88HSE/353/4024				
JULY QUARTERLY	- AMENDMENT	24,036	35,688	21APR88 -30JUN88	20 88HSE/359/3926				
JULY QUARTERLY	- AMENDMENT	-	-	21APR88 -30JUN88	1 88HSE/359/4429				
JULY QUARTERLY	- AMENDMENT	24,236	35,688	21APR88 -30JUN88	19 88HSE/359/4430				
REQUEST FOR ADDITIONAL INFORMATION				21APR88 -30JUN88	1 88FEC/543/1247				
OCTOBER QUARTERLY		11,231	11,148	1JUL88 -30SEP88	12 88HSE/362/3284				
OCTOBER QUARTERLY	- AMENDMENT	-	-	1JUL88 -30SEP88	8 89SEN/004/1785				
REQUEST FOR ADDITIONAL INFORMATION				1JUL88 -30SEP88	4 89FEC/596/1146				
REQUEST FOR ADDITIONAL INFORMATION 2ND				1JUL88 -30SEP88	5 89FEC/597/2582				
YEAR-END		160	2,778	1OCT88 -31DEC88	7 89HSE/376/0169				
YEAR-END	- AMENDMENT	160	2,778	1OCT88 -31DEC88	7 89HSE/378/0343				
YEAR-END	- AMENDMENT	160	2,778	1OCT88 -31DEC88	7 89HSE/378/0493				
YEAR-END	- AMENDMENT	160	2,778	1OCT88 -31DEC88	7 89HSE/378/2920				
REQUEST FOR ADDITIONAL INFORMATION				1OCT88 -31DEC88	1 89FEC/588/3739				
REQUEST FOR ADDITIONAL INFORMATION 2ND				1OCT88 -31DEC88	1 89FEC/590/3788				
TOTAL		159,330	0	159,499	0	222		TOTAL PAGES	
3. AUTHORIZED COMMITTEES									
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN									

All reports above have been reviewed.
 Debts as of 12/31/88: \$12,000
 Cash on hand as of 12/31/88: \$(169)

21040822457

FEDERAL ELECTION COMMISSION
1989-1990
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 08/08/89

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
ZORINSKY, CECILE		HOUSE 02 DEMOCRATIC PARTY							
1. STATEMENT OF CANDIDATE									
2. PRINCIPAL CAMPAIGN COMMITTEE									
CECE ZORINSKY FOR CONGRESS									
1989 MID-YEAR REPORT	- TERMINATED		23,794		23,624				
TOTAL			23,794	0	23,624	0		9	TOTAL PAGES
3. AUTHORIZED COMMITTEES									
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN									

ID #C00221358 HOUSE
1JAN89 -30JUN89 9 89HSE/381/2910

Debts as of 6/30/89: \$0
Cash on hand as of 6/30/89: \$0

21040322458

Political Party Committee

This information is to be used for reporting and record-keeping only and is not to be used by any person for the purpose of soliciting contributions or for any other purpose. It is to be used only for the purpose of identifying contributions and for record-keeping.

Amount of Contribution in Full

Cece Zornitsky for Congress

A. Full Name, Mailing Address and ZIP Code Comm. Htee to Re-Elect Pat Kelly Belton, NE 68009 Receipt For: ☒ Primary ☐ General ☐ Other Identify:	Name of Employer Occupation Aggregate Year-to-Date > \$15.00	Date Received (day, month, year) 8-6-88	Amount of Cash Received this Period \$5.00
B. Full Name, Mailing Address and ZIP Code ZORINSKY FOR US SENATE SUITE 211 705 S. 17th ST PLATA 014504, NE-43-A 68111 Receipt For: ☒ Primary ☐ General ☐ Other Identify:	Name of Employer Occupation Aggregate Year-to-Date > \$ 3500.00	Date Received (day, month, year) 6-18-88	Amount of Cash Received this Period 3500.00 <i>me</i>
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other Identify:	Name of Employer Occupation Aggregate Year-to-Date > 0	Date Received (day, month, year)	Amount of Cash Received this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other Identify:	Name of Employer Occupation Aggregate Year-to-Date > 0	Date Received (day, month, year)	Amount of Cash Received this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other Identify:	Name of Employer Occupation Aggregate Year-to-Date > 0	Date Received (day, month, year)	Amount of Cash Received this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other Identify:	Name of Employer Occupation Aggregate Year-to-Date > 0	Date Received (day, month, year)	Amount of Cash Received this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other Identify:	Name of Employer Occupation Aggregate Year-to-Date > 0	Date Received (day, month, year)	Amount of Cash Received this Period

DISPOSABLE of Receipts This Page (optional) **2575.00**

TOTAL This Period (see page 10 for number only) **105.00**

01130413524436

ITEMIZED RECEIPTS

Use Official Statement
for all categories of the
General Summary Page

PAGE 13
FOR LINE NUMBER 118

POLITICAL PARTY COMMITTEE

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of influencing 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

GEORGE BARRINGTON COO CONGRESS

A. Full Name, Mailing Address and ZIP Code

BARRINGTON FOR US SENATE
SUITE 400
900 SOUTH 7TH PLAZA
OMAHA, NEBRASKA 68114

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date \$ 15,000

Date (month, day, year)

APR 88

Amount of Each Receipt this Period

9000.00

me

B. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date \$

Date (month, day, year)

Amount of Each Receipt this Period

C. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date \$

Date (month, day, year)

Amount of Each Receipt this Period

D. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date \$

Date (month, day, year)

Amount of Each Receipt this Period

E. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date \$

Date (month, day, year)

Amount of Each Receipt this Period

F. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date \$

Date (month, day, year)

Amount of Each Receipt this Period

G. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date \$

Date (month, day, year)

Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (next page this line number only)

9000.00

287
32460
33333
36333
30333
10400
28130



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAY 24 1989

Edward A. Kohout, Treasurer
Cece Sorinsky for Congress
8531 Hickory Street
Omaha, NE 68124

Identification Number: C00221358

Reference: October Quarterly Report (7/1/88-9/30/88)

Dear Mr. Kohout:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limit set forth in the Act. No political committee other than a qualified multicandidate committee may make contributions to a candidate for Federal office in excess of \$1,000 per election. The Sorinsky for U.S. Senate did not meet the requirements for qualified multicandidate status as of the date the contribution(s) was made to your committee. The term "contribution" includes any gift, subscription, loan, advance or deposit of money and anything of value made by any person for the purpose of influencing any election for Federal office. (2 U.S.C. §§441a(a) and (f); 11 CFR 110.1(b))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limit, you should either refund to the donor(s) the amount in excess of \$1,000 or get the donor(s) to redesignate the contribution(s) in writing. All refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Copies of refund checks and copies of letters reattributing or redesignating the contributions in question may be used to respond to this letter. Refunds are reported on Line 20 of the Detailed Summary Page and on Schedule B of the report covering the period in which they are made. Redesignations are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation is received. (11 CFR 104.8(d)(2) and (4))

21040322461

Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation of the excessive amount will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Karen White

Karen White
Reports Analyst
Reports Analysis Division

21040322462



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

June 15, 1989

Edward A. Kohout, Treasurer
Cece Zorinsky for Congress
8531 Hickory Street
Omaha, NE 68124

Identification Number: C00221358

Reference: October Quarterly Report (7/1/88-9/30/88)

Dear Mr. Kohout:

This letter is to inform you that as of June 14, 1989, the Commission has not received your response to our request for additional information, dated May 24, 1989. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed. Please note that although we have not received a response from your committee, we have received a response from the Committee to Re-Elect Senator Zorinsky indicating that they have requested a refund from your committee.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Karen White on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

91040322463

MEMORANDUM TO FILES:

DATE July 11, 1989

TELECON X
VISIT

NAME OF COMMITTEE: Cece Zorinsky for Congress Committee (C00221358) Nebraska

SUBJECT: October Quarterly Report (1988)

FEC REP: Karen White

COMMITTEE REP: Al Abramson (402) 397-8570

Mr. Abramson called to see if the Commission had received their amendment for the 1988 October Quarterly Report. The Analyst checked the index and there was no record of an amendment for the October Quarterly Report. Mr. Abramson said that he would send in the information right away.

91040322464

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES DIVISION

09 JUL 17 AM 10:40

May 15, 1989

Ms. Pat Sheppard
Federal Election Commission
999 E. St. NW
Washington, DC 20463

RE: The Committee to Re-Elect Senator Zorinsky
ID No.: C000032862

Dear Pat:

This letter is in regard to your letter of May 9, 1989 concerning the mid-year and end-year reports for 1988.

The committee inadvertently dispersed \$12,500 to the CeCe Zorinsky for Congress Committee during the year. It was believed at that time that a political committee could contribute without limit to another political committee. Of course, we were mistaken. It is our intention to correct this mistake as soon as possible.

The following actions will take place to correct this problem:

1. The CeCe Zorinsky for Congress Committee will immediately refund all excess contributions (\$11,500) to the Committee to Re-Elect Senator Zorinsky; and
2. The excess contributions of \$11,500 will be paid out to Mrs. Edward Zorinsky or a trust for the benefit of Mrs. Edward Zorinsky shortly after the refund is received by our committee.

These actions will be documented on our mid-year report for 1989.

If you have any further questions regarding this matter or any other matters, please do not hesitate to contact me at your earliest convenience.

Yours very truly,

Michael W. Abramson
Treasurer for the Committee to Re-Elect Senator Zorinsky

MWA/lov

MEMORANDUM TO FILES:

DATE July 26, 1989

TELECON X
VISIT

NAME OF COMMITTEE: Cece Zorinsky for Congress Committee (C00221358) Nebraska

SUBJECT: 1988 October Quarterly Report

FEC REP: Karen White

COMMITTEE REP: Al Abramson (402) 397-8570

Mr. Abramson called to state that they have not refunded the excessive contributions. The Campaign has no money and Cece Zorinsky is not planning on running for office in the next election. The Analyst told Mr. Abramson that they would have to keep reporting until the debt was paid off. The Analyst told him that they could accomplish this by fundraising or personal funds from the candidate.

21040322466

STANDARD 1

STANDARD 2

STANDARD 3

STANDARD 4

Any information obtained from such Reports and Statements may not be sold or used by any person for the purpose of obtaining contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such sources.

NAME OF COMMITTEE TO FILL

CE RE BOLINSKY FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CANNITTEE TO REELECT EDWARD BOLINSKY CHANA, NEARBYA 6814	REBOUND SAC. 3 CONTRIB. 11000 Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	5-1-89	11500.00 ME
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

11500.00

TOTAL This Period (last page only)

11500.00

91040322467

89 OCT -5 AM 11:24

SENSITIVE

**FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463**

FIRST GENERAL COUNSEL'S REPORT

**RAD Referrals # 89L-23, 89L-32
STAFF MEMBER: A. Buckley**

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS: Committee to Re-Elect Senator Zorinsky and
Michael N. Abramson, as treasurer; CeCe
Zorinsky for Congress and Edward A. Kohout,
as treasurer

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(A), (f)
11 C.F.R. § 110.1(b)(2)(ii)

**INTERNAL REPORTS
CHECKED:** Referral Materials

**FEDERAL AGENCIES
CHECKED:** None

I. GENERATION OF MATTER

The Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer, were referred to the Office of the General Counsel by the Reports Analysis Division ("RAD") for making excessive contributions to a federal candidate totalling \$11,500. (RAD Ref. 89L-23). CeCe Zorinsky for Congress and Edward A. Kohout, as treasurer, were separately referred to the Office of the General Counsel by RAD for knowingly receiving these apparent excessive contributions. (RAD Ref. 89L-32). The Committee to Re-Elect Senator Zorinsky was the principal campaign committee of Senator Edward Zorinsky for the 1988 Nebraska Senatorial primary election. Senator Zorinsky died in March, 1987. The Senator's widow, CeCe Zorinsky, made an unsuccessful bid to be the Democratic Party's nominee for

91040322468

representative from the Second District in Nebraska in 1988.

Schedule B of the Committee to Re-Elect Senator Zorinsky's 1988 Mid-Year Report disclosed that \$3,500 had been contributed to CeCe Zorinsky for Congress on June 28, 1988, while Schedule B of the Committee to Re-Elect Senator Zorinsky's 1988 Year-End Report disclosed that \$9,000 had been contributed to CeCe Zorinsky for Congress on July 28, 1988, for a total of \$12,500. Schedule A of CeCe Zorinsky for Congress's 1988 July Quarterly Report discloses receipt of a contribution from the Committee to Re-Elect Senator Zorinsky in the amount of \$3,500, while Schedule A of CeCe Zorinsky for Congress's 1988 October Quarterly Report discloses receipt of a contribution from the same committee in the amount of \$9,000. Both contributions were designated for the primary campaign. RAD determined that this resulted in apparent excessive contributions totaling \$11,500, and requested the Committee to Re-Elect Senator Zorinsky to obtain a refund of the amount in excess of the \$1,000 per election limit.

In a letter dated May 18, 1989, the Committee to Re-Elect Senator Zorinsky informed RAD that it had requested a refund of the excessive amount, and that this activity would be disclosed on the 1989 Mid-Year Report. Such a refund was reported by the Committee to Re-Elect Senator Zorinsky on Schedule A of its 1989 Mid-Year Report, and by CeCe Zorinsky for Congress on Schedule B

21040322469

of its 1989 Mid-Year Report.¹

II. FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person may contribute more than \$1,000 to any candidate and her authorized political committee with respect to any election for Federal office. A political committee is considered a person. See 2 U.S.C. § 431(11). Pursuant to 2 U.S.C. § 441a(f), it is unlawful for any committee to knowingly accept any contribution which exceeds the limitations established by the Act.

On April 20, 1987 and May 8, 1987, George Kubat, then treasurer of the Committee to Re-Elect Senator Zorinsky, sent letters to the Commission requesting an advisory opinion concerning the propriety of certain plans being considered for disposing of excess campaign funds remaining in the Committee to Re-Elect Senator Zorinsky's account at Senator Zorinsky's death. In AO 1987-11, the Commission advised the Committee to Re-Elect Senator Zorinsky that excess campaign funds could be transferred to CeCe Zorinsky in her capacity as the senator's widow without such transfer being subject to the contribution limits of the Act or regulations. However, the Commission further noted that any use of the excess campaign funds which involved contributions to a political committee would be subject to the contribution limitations of the Act. The specific issue of

1. RAD has reported that, in a telephone conversation on July 26, 1989, an agent for CeCe Zorinsky for Congress stated that the Committee had no funds and therefore could not make the necessary contribution refunds. As this statement occurred after the purported refund had been made, this Office discounts its reliability and is making no recommendation based upon it.

91040322470

contributions to Mrs. Zorinsky's campaign was not raised and thus not addressed. The Committee to Re-Elect Senator Zorinsky has not converted to multi-candidate status.

Here, the Committee to Re-Elect Senator Zorinsky made contributions totalling \$12,500 to CeCe Zorinsky for Congress which were designated for the primary election. Thus, the Committee to Re-Elect Senator Zorinsky exceeded the \$1,000 limitation by \$11,500. Also, CeCe Zorinsky for Congress accepted \$12,500 in contributions from the Committee to Re-Elect Senator Zorinsky for the 1988 primary campaign, \$11,500 in excess of the limit imposed by the Act.

Accordingly, this Office recommends that the Commission open a MUR, find reason to believe the Committee to Re-Elect Senator Zorinsky violated 2 U.S.C. § 441a(a)(1)(A), find reason to believe CeCe Zorinsky for Congress violated 2 U.S.C. § 441a(f), and approve the attached letters and Factual and Legal Analyses.

III. RECOMMENDATIONS

1. Open a MUR in RAD Ref. 89L-23.
2. Open a MUR in RAD Ref. 89L-32.
3. Find reason to believe the Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).
4. Find reason to believe CeCe Zorinsky for Congress and Edward A. Kohout, as treasurer, violated 2 U.S.C. § 441a(f).

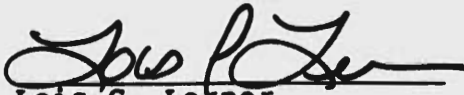
91040322471

5. Merge these two matters.
6. Approve the attached letters and Factual and Legal Analyses.

Lawrence M. Noble
General Counsel

10-4-89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Referral Materials of the Committee to Re-Elect Senator Zorinsky
2. Referral Materials of CeCe Zorinsky for Congress
3. Proposed Letters (2) and Factual and Legal Analyses (2)

91040322472

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Committee to Re-Elect Senator
Zorinsky and Michael N. Abramson,
as treasurer; CeCe Zorinsky for
Congress and Edward A. Kohout, as
treasurer

)
)
)
)
)
)
)

RAD Referrals
#89L-23 and
#89L-32

MUR 2986

MUR 2987

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 10, 1989, the Commission decided by a vote of 5-0 to take the following actions in RAD Referrals #89L-23 and #89L-32:

1. Open a MUR in RAD Ref. 89L-23.
2. Open a MUR in RAD Ref. 89L-32.
3. Find reason to believe the Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).
4. Find reason to believe CeCe Zorinsky for Congress and Edward A. Kohout, as treasurer, violated 2 U.S.C. § 441a(f).
5. Merge these two matters.
6. Approve the letters and Factual and Legal Analyses attached to the General Counsel's Report dated October 4, 1989.

(continued)

1040322473

FEDERAL ELECTION COMMISSION
CERTIFICATION FOR RAD REFERRALS
89L-23 AND 89L-32

PAGE 2

Commissioners Aikens, Elliott, Josefiak, McDonald and Thomas voted affirmatively for the decision. Commissioner McGarry did not cast a vote.

Attest:

Oct. 10, 1989
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat:	Thursday, October 5, 1989	11:24
Circulated to the Commission:	Thursday, October 5, 1989	4:00
Deadline for vote:	Tuesday, October 10, 1989	4:00

91040322474



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 18, 1989

Edward A. Kohout, Treasurer
CeCe Zorinsky for Congress
8531 Hickory Street
Omaha, NE 68124

RE: MUR 2987
CeCe Zorinsky for Congress

Dear Mr. Kohout:

On October 10, 1989, the Federal Election Commission found that there is reason to believe CeCe Zorinsky for Congress ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for

21040322475

Edward A. Kohout, Treasurer
Page 2

pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

Enclosures

- ✓Factual and Legal Analysis
- Procedures
- Designation of Counsel Form

91040322476

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: CeCe Zorinsky for Congress and
Edward A. Kahout, as treasurer

MUR: 2987

Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person may contribute more than \$1,000 to any candidate and her authorized political committee with respect to any election for Federal office. A political committee is considered a person. See 2 U.S.C. § 431(11). Pursuant to 2 U.S.C. § 441a(f), it is unlawful for any committee to knowingly accept any contribution which exceeds this limitation.

Schedule A of CeCe Zorinsky for Congress's 1988 July Quarterly Report discloses receipt of a contribution from the Committee to Re-Elect Senator Zorinsky in the amount of \$3,500, while Schedule A of CeCe Zorinsky for Congress's 1988 October Quarterly Report discloses receipt of a contribution from the same committee in the amount of \$9,000. Both contributions were designated for the primary campaign.

On April 20, 1987 and May 8, 1987, George Kubat, then treasurer of the Committee to Re-Elect Senator Zorinsky, sent letters to the Commission requesting an advisory opinion concerning the propriety of certain plans being considered for disposing of excess campaign funds remaining in the Committee to Re-Elect Senator Zorinsky's account at Senator Zorinsky's death. In AO 1987-11, the Commission advised the Committee to Re-Elect Senator Zorinsky that excess campaign funds could be transferred

91040322477

to CeCe Zorinsky in her capacity as the senator's widow without such transfer being subject to the contribution limits of the Act or regulations. However, the Commission further noted that any use of the excess campaign funds which involved contributions to a political committee would be subject to the contribution limitations of the Act. The specific issue of contributions to Mrs. Zorinsky's campaign was not raised and thus not addressed. The Committee to Re-Elect Senator Zorinsky has not converted to multi-candidate status.

Here, CeCe Zorinsky for Congress accepted \$12,500 in contributions from the Committee to Re-Elect Senator Zorinsky for the 1988 primary campaign, \$11,500 in excess of the limit imposed by the Act. Therefore, there is reason to believe CeCe Zorinsky for Congress and Edward A. Kahout, as treasurer, violated 2 U.S.C. § 441a(f).

91040322478



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1989

Michael N. Abramson, Treasurer
Committee to Re-Elect Senator Zorinsky
900 South 74th Plaza #400
Omaha, NE 68114

RE: MUR 2987
Committee to Re-Elect Senator
Zorinsky

Dear Mr. Abramson:

On October 10, 1989, the Federal Election Commission found that there is reason to believe the Committee to Re-Elect Senator Zorinsky ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for

21040322479

Michael N. Abramson, Treasurer
Page 2

pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

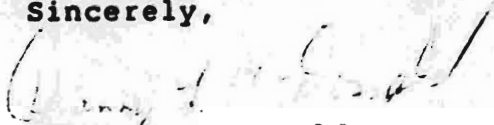
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form

21040322430

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Committee to Re-Elect Senator
Zorinsky and Michael N. Abramson,
as treasurer

MUR: 2986

Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person may contribute more than \$1,000 to any candidate and her authorized political committee with respect to any election for Federal office. A political committee is considered a person. See 2 U.S.C. § 431(11).

Schedule B of the Committee to Re-Elect Senator Zorinsky's 1988 Mid-Year Report disclosed that \$3,500 had been contributed to CeCe Zorinsky for Congress on June 28, 1988, while Schedule B of the Committee to Re-Elect Senator Zorinsky's 1988 Year-End Report disclosed that \$9,000 had been contributed to CeCe Zorinsky for Congress on July 28, 1988, for a total of \$12,500. These contributions were designated for the primary election.

On April 20, 1987 and May 8, 1987, George Kubat, then treasurer of the Committee to Re-Elect Senator Zorinsky, sent letters to the Commission requesting an advisory opinion concerning the propriety of certain plans being considered for disposing of excess campaign funds remaining in the Committee to Re-Elect Senator Zorinsky's account at Senator Zorinsky's death. In AO 1987-11, the Commission advised the Committee to Re-Elect Senator Zorinsky that excess campaign funds could be transferred to CeCe Zorinsky in her capacity as the senator's widow without such transfer being subject to the contribution limits of the

31040322431

Act or regulations. However, the Commission further noted that any use of the excess campaign funds which involved contributions to a political committee would be subject to the contribution limitations of the Act. The specific issue of contributions to Mrs. Zorinsky's campaign was not raised and thus not addressed. The Committee to Re-Elect Senator Zorinsky has not converted to multi-candidate statues.

Here, the Committee to Re-Elect Senator Zorinsky made contributions totaling \$12,500 to CeCe Zorinsky for Congress for the primary election. Therefore, there is reason to believe the Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).

91040322482



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

October 23, 1989

Edward A. Kohout, Treasurer
CeCe Zorinsky for Congress
8531 Hickory Street
Omaha, NE 68124

RE: MUR 2987

Dear Mr. Kohout:

On July 31, 1989, you requested that the Federal Election Commission permit CeCe Zorinsky for Congress ("Committee") to terminate pursuant to 2 U.S.C. § 433(d) and Section 102.3 of the Commission's Regulations. Because of the ongoing enforcement matter involving your Committee, this request has been denied. Therefore, you are reminded that the Committee must continue to file all the required reports with the Commission until such time as the enforcement matter has been closed as to the Committee.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner

BY: Lois G. Lerner *by GDL*
Associate General Counsel

91040322483

06C4388
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 OCT 26 AM 10:30

October 23, 1989

Mr. Anthony Buckley
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2987 Committee to Re-Elect
Senator Zorinsky and CeCe Zorinsky for Congress

Dear Mr. Buckley:

This letter is in response to the letters from the Federal Election Commission dated October 18, 1989.

Pursuant to our recent conversation, the Committee to Re-Elect Senator Zorinsky inadvertently distributed \$12,500 to the CeCe Zorinsky for Congress Committee. After we learned that these contributions were in excess of the legal limit, the Committee to Re-Elect Senator Zorinsky immediately requested a refund of these monies from the CeCe Zorinsky for Congress Committee and then redistributed these amounts to Mrs. Zorinsky personally.

It is the intention of both Committees to request a pre-probable cause conciliation with the Federal Election Commission concerning the alleged campaign violations. To this effect, I have filled out the statement of designation of counsel to expedite this proceeding. All correspondence concerning the Committee to Re-Elect Senator Zorinsky and the CeCe Zorinsky for Congress Committee should be directed to Bruce H. Brodkey, 400 Continental Building, Omaha, Nebraska 68102.

Thank you for your consideration in this matter.

Very truly yours,

Michael N. Abramson

Michael N. Abramson
Treasurer for the Committee to
Re-Elect Senator Zorinsky

MNA:db

Enclosure

cc: Bruce Brodkey

89 OCT 26 PM 12:03

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91040322484

STATEMENT OF DESIGNATION OF COUNSEL

NUR 2987

NAME OF COUNSEL: BRUCE H. BROOKLEY

ADDRESS: 400 CONTINENTAL BLDG.
OMAHA, NE. 68102

TELEPHONE: 402-346-2000

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

10/23/89
Date

Michael M. Olson
Signature

TREASURER - COMM TO RE-ELECT SENATOR
ZORINSKY

RESPONDENT'S NAME: CELE ZORINSKY FOR CONGRESS
COMM. TO RE-ELECT ZORINSKY

ADDRESS: 700 SO. 74TH PLZ #400
OMAHA, NE. 68114

HOME PHONE: 402-334-2418

BUSINESS PHONE: 402-397-8570

21040322485

06C 4880
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 DEC 14 AM 10: 54

December 8, 1989

Mr. Anthony Buckley
General Counsel's Office
Federal Election Commission
Washington, DC 20463

RE: MUR2987
Committee to Re-elect Senator Zorinsky and
CeCe Zorinsky for Congress

Dear Mr. Buckley:

This letter is to inform you that Bruce H. Brodkey has been designated to be the council of the CeCe Zorinsky for Congress Committee concerning the action pending with the Federal Election Commission.

Mr. Brodkey shall be authorized to receive all notifications and other communications from the commission and act on the committee's behalf before the commission. Mr. Brodkey may be reached by mail at 400 Continental Building, Omaha, Nebraska 68102 or by phone at (402) 346-2000.

If you have any further questions concerning this matter, please do not hesitate to contact me at your earliest convenience.

Very truly yours,

Alvin Abramson
Alvin Abramson
Officer of the CeCe Zorinsky for
Congress Committee

AA/fsw

cc: Bruce H. Brodkey

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
89 DEC 15 PM 12: 00

91040322436

BATT & BRODKEY
ATTORNEYS
400 CONTINENTAL BUILDING
OMAHA, NEBRASKA 68102-1757
(402) 346-2000

060504
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 JAN -2 PM 12: 24

LAWRENCE I. BATT, P.C.
BRUCE H. BRODKEY, P.C.
THOMAS P. KENNY
MARK A. SMITH

Fax (402) 346-4108

December 26, 1989

Mr. Anthony Buckley
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

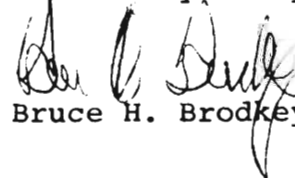
Re: MUR 2987 Committee to Re-Elect
Senator Zorinsky and CeCe Zorinsky for Congress

Dear Mr. Buckley:

In accordance with our recent telephone conversation, the CeCe Zorinsky for Congress Committee requests a pre-probable cause conciliation with the Federal Election Commission concerning alleged campaign violations. I understand that you require this letter to commence the necessary actions toward that end by your office.

This letter supplements Mr. Abramson's prior request letter of October 23, 1989, requesting pre-probable cause conciliation for both the CeCe Zorinsky for Congress and the Committee to Re-Elect Senator Zorinsky. Please contact me if you should have any questions.

Yours very truly,


Bruce H. Brodkey, P.C.

BHB:pac
cc: Mr. Michael N. Abramson

90 JAN -2 PM 1:27

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

90 JAN -2 PM 1:27

2 1 5 4 0 3 2 2 4 8 7

90 FEB -6 AM 11:21

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
Committee to Re-Elect)
Senator Zorinsky and Michael N.)
Abramson, as treasurer) MUR 2987
CeCe Zorinsky for Congress and)
Edward A. Kahout, as treasurer)
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Schedule B of the Committee to Re-Elect Senator Zorinsky's 1988 Mid-Year Report disclosed that \$3,500 had been contributed to CeCe Zorinsky for Congress on June 28, 1988, while Schedule B of the Committee to Re-Elect Senator Zorinsky's 1988 Year-End Report disclosed that \$9,000 had been contributed to CeCe Zorinsky for Congress on July 28, 1988, for a total of \$12,500. Schedule A of CeCe Zorinsky for Congress's 1988 July Quarterly Report disclosed receipt of a contribution from the Committee to Re-Elect Senator Zorinsky in the amount of \$3,500, while Schedule A of the former committee's 1988 October Quarterly Report disclosed receipt of a contribution from the latter committee in the amount of \$9,000.

On October 10, 1989, the Commission found that there is reason to believe the Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A) by making an excessive contribution in the amount of \$11,500 to CeCe Zorinsky for Congress for the 1988 Nebraska primary election, and that CeCe Zorinsky for Congress

9104032248

and Edward A. Kahout, as treasurer, violated 2 U.S.C. § 441a(f) by accepting this excessive contribution.

II. ANALYSIS

On October 26, 1989, this Office received a designation of counsel form and a request for pre-probable cause conciliation from the treasurer of the Committee to Re-Elect Senator Zorinsky. In that letter, Mr. Abramson stated that "[a]fter we learned that these contributions were in excess of the legal limit, the Committee to Re-Elect Senator Zorinsky immediately requested a refund of these monies from the CeCe Zorinsky for Congress Committee and then redistributed these amounts to Mrs. Zorinsky personally."

Although this letter purported to designate counsel and to request pre-probable cause conciliation on behalf of both committees, it was unclear to this Office whether Mr. Abramson had the authority to take these actions on behalf of CeCe Zorinsky for Congress. These concerns were addressed to that committee, and on December 15, 1989, this Office received an appropriate designation of counsel from CeCe Zorinsky for Congress. Subsequently, on January 2, 1990, this Office received a letter from counsel for CeCe Zorinsky for Congress requesting pre-probable cause conciliation.

The letter from the treasurer of the Committee to Re-Elect Senator Zorinsky not only does not challenge the Commission's reason to believe finding against it but effectively admits that the violation occurred. Nor does CeCe Zorinsky for Congress challenge the Commission's finding against it.

91040322489

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Enter into conciliation with the Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer, prior to a finding of probable cause to believe.
2. Enter into conciliation with CeCe Zorinsky for Congress and Edward A. Kahout, as treasurer, prior to a finding of probable cause to believe.
3. Approve the attached proposed conciliation agreements and letters.

Lawrence M. Noble
General Counsel

Date 2/5/90

BY:


Lois G. Lerner
Associate General Counsel

91040322490

Attachments

- 1. Designations of Counsel and
Requests for Conciliation**
- 2. Proposed Conciliation Agreements (2)
and Letters (2)**

Staff assigned: A. Buckley

91040322491

06-C5581

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 MAR -5 AM 9:48

BATT & BRODKEY
ATTORNEYS
400 CONTINENTAL BUILDING
OMAHA, NEBRASKA 68102-1757
(402) 346-2000

LAWRENCE I. BATT, P.C.
BRUCE H. BRODKEY, P.C.
THOMAS P. KENNY
MARK A. SMITH

Fax (402) 346-4108

February 28, 1990

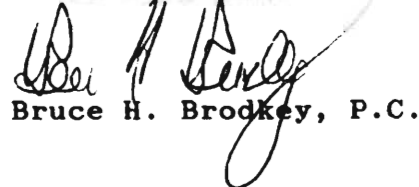
Mr. Anthony Buckley
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2987 Committee to Re-Elect
Senator Zorinsky and CeCe Zorinsky for Congress

Dear Mr. Buckley:

I note from my file that we have not heard anything back from the general counsel's office since my letter to you of December 26, 1989 (copy enclosed). The committees that I represent are still very desirous of working towards a conciliation of the commission's claims and would appreciate hearing from your office at your convenience. I thank you very much for your cooperation.

Yours very truly,


Bruce H. Brodkey, P.C.

BHB:ekm
cc: Michael N. Abramson

90 MAR -5 PM 2:04

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE

2104032422

BATT & BRODKEY
ATTORNEYS
400 CONTINENTAL BUILDING
OMAHA, NEBRASKA 68102-1757
(402) 348-2000

LAWRENCE I. BATT, P.C.
BRUCE H. BRODKEY, P.C.
THOMAS P. KENNY
MARK A. SMITH

Fax (402) 348-4108

December 26, 1989

Mr. Anthony Buckley
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

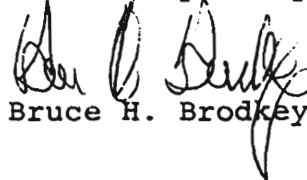
Re: MUR 2987 Committee to Re-Elect
Senator Zorinsky and CeCe Zorinsky for Congress

Dear Mr. Buckley:

In accordance with our recent telephone conversation, the CeCe Zorinsky for Congress Committee requests a pre-probable cause conciliation with the Federal Election Commission concerning alleged campaign violations. I understand that you require this letter to commence the necessary actions toward that end by your office.

This letter supplements Mr. Abramson's prior request letter of October 23, 1989, requesting pre-probable cause conciliation for both the CeCe Zorinsky for Congress and the Committee to Re-Elect Senator Zorinsky. Please contact me if you should have any questions.

Yours very truly,



Bruce H. Brodkey, P.C.

BHB:pac
cc: Mr. Michael N. Abramson

21040322493

06C 6348

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

BATT & BRODKEY
ATTORNEYS
400 CONTINENTAL BUILDING
OMAHA, NEBRASKA 68102-1757
(402) 346-2000

90 MAY 25 AM 10:49

LAWRENCE I. BATT, P.C.
BRUCE H. BRODKEY, P.C.
THOMAS P. KENNY
MARK A. SMITH

May 22, 1990

Fax (402) 346-4108

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 MAY 29 PM 3:59

Mr. Anthony Buckley
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2987 Committee to Re-Elect
Senator Zorinsky and CeCe Zorinsky for Congress

Dear Mr. Buckley:

As you recall I represent both the Committee to Re-Elect Senator Edward Zorinsky and CeCe Zorinsky for Congress Committee with reference to finding of Federal Election Commissions that probable cause exists to believe that the Campaign Committees and their respective treasurers may have violated the provisions of 2 U.S.C. Sec. 441a(a)(1)(A).

The Committee to Re-Elect Senator Zorinsky has admitted it inadvertently disbursed \$12,500.00 to CeCe Zorinsky for Congress Committee during the year 1988. Additionally, and beyond the scope of the initial Commission inquiry, it appears that in January and April of 1989, a total of \$12,109.79 was deposited to the CeCe Zorinsky for Congress Committee from funds held by the Committee to Re-Elect Senator Zorinsky. The purpose of this letter is to forthrightly discuss the remedial action taken by the Committees with reference to those distributions.

I have reviewed the actions taken with representatives of the committees and I am pleased to enclose with this letter some documents prepared by Mr. Michael Abramson of the Committee to Re-Elect Senator Zorinsky. These include a cover sheet breaking down the transactions, together with a work paper and "Reports of Receipts and Disbursements" for both the Zorinsky for Congress and the Committee to Re-Elect Zorinsky (FEC Form 3) filed by the committees for both halves of the 1989 calendar year.

A careful review of the materials enclosed shows that CeCe Zorinsky contributed \$11,500.00 to her committee. In turn the committee refunded that amount of the excess contribution to the Ed Zorinsky committee which in turn paid CeCe Zorinsky \$11,500.00 as a reimbursement. This reimbursement we understand to be entirely within the federal election laws and regulations in

91040322494

Mr. Anthony Buckley
May 22, 1990
Page 2

accordance with the opinion letter of June 12, 1987 from the Federal Election Commission.

With respect to the deposit of \$12,109.79 into the CeCe Zorinsky campaign (deposit tickets attached), CeCe Zorinsky contributed \$11,109.79 to her campaign to pay off various campaign debts. The Ed Zorinsky committee reimbursed her for that sum and then contributed \$1,000.00 to her committee. We believe that the \$1,000.00 campaign contribution from one campaign committee to another is within the allowable limits of federal law.

Finally, the excess contribution of \$1,000.00 (considered as part of the \$12,500.00 contribution) was returned by the CeCe Zorinsky for Congress Committee to the Zorinsky for Senate Committee in the second half of 1989, all as disclosed by the attached FEC Form 3s. As a result, any claim of excess contributions has now been rectified by the two Committees and the individual.

The Committees which I represent are still desirous of working towards a conciliation of the Commission's claims and would appreciate hearing from your office at your early convenience. If you should have any additional inquiries, please do not hesitate to call me.

Yours very truly,



Bruce H. Brodkey, P.C.

BHB:ekm
enclosures
cc: Michael N. Abramson

91040322495

1959

	ED ZOBANSKY COMMITTEE IN	ED ZOBANSKY COMMITTEE OUT	CELE ZOBANSKY FOR CONGRESS IN	CELE ZOBANSKY FOR CONGRESS OUT	CELE ZOBANSKY IN	CELE ZOBANSKY OUT
① RETURN OF EXIST CONTRIBUTIONS: CELE PERSONALLY CONTRIBUTED \$11,500 TO HER COMMITTEE. THE COMMITTEE REFUNDS THIS AMOUNT TO THE ED ZOBANSKY COMMITTEE. THE ED ZOBANSKY COMMITTEE PAYS CELE ZOBANSKY \$11,500 AT A REIMBURSEMENT.	① 11,500.00	② 11,500.00	③ 11,500.00	④ 11,500.00	⑤ 11,500.00	⑥ 11,500.00
② CELE CONTRIBUTES 11,109.79 TO HER CAMPAIGN TO PAYOFF VARIOUS DEBTS. ED ZOBANSKY COMMITTEE REIMBURSES CELE \$11,109.79 AND CONTRIBUTES \$1,800 TO HER COMMITTEE.		③ 12,109.79	④ 11,109.79		⑤ 11,109.79	⑥ 11,109.79
③ RETURN OF EXIST CONTRIBUTIONS: SAIDE AT #1 EXCEPT THE AMOUNT IN QUESTION IS \$1,800.	① 1000.00	② 1000.00	③ 1000.00	④ 1000.00	⑤ 1000.00	⑥ 1000.00
					23,609.79	

ED ZORINSKY FOR SENATE		BALANCE 12-31-78	DR	CR	BALANCE 6-30-79	DR	CR	BALANCE 12-31-79
ASSETS:								
CHECKING	146453	① 1500.00	③ 2408.59	5599.46	① 500.00	③ 623.17	459.67	
SAVINGS	73673	② 1880		75553	② 1925		77481	
MUTUAL OF ONTARIO	137750.31	① 11500.00	③ 11500.00	129127.22	① 9310.00	③ 2130.50	132706.91	
		② 5656.10	③ 11500.00		② 1802.50			
	139951.57			131138.69			133941.29	
LIABILITIES + EQUITY:								
LOANS	-							
SURPLUS A/C	17029091			139951.57			131138.69	
CURRENT	<3030934>			<884258>			2802.60	
	139951.57			131138.69			133941.29	
INCOME:								
INTEREST INCOME		① 5675.50		5675.50	① 5629.37		1100487	
REFUNDS (NOI TAX)		② 5600		11500.00			11500.00	
				17175.50			22504.87	
EXPENSES:								
BANK CHARGES		① 759		759	① 36.17	① 2690	1686	
CELE FORMALLY CAN.		② 12109.79	③ 11109.79	1000.00	② 1000.00			
CHARGES								
CELE ZORINSKY		① 11500.00		22609.79	① 1000.00		23609.79	
PRO. FEES		② 522.00		522.00	② 2517.50		3039.50	
TAXES - FED		① 1427.00		1427.00			1427.00	
TAXES - STATE		② 452.00		452.00			452.00	
				26018.58			24545.15	
NET				<884258>			<604038>	

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)

CECE ZORINSKY FOR CONGRESS

ADDRESS (number and street) ☒ Check if different than previously reported.

900 SOUTH 74 PLAZA SUITE 400

CITY, STATE and ZIP CODE

STATE/DISTRICT

OMAHA, NEBRASKA 68114 NEAR 7ND

2. FEC IDENTIFICATION NUMBER

124966

3. IS THIS REPORT AN AMENDMENT?

☒ YES

☐ NO

4. TYPE OF REPORT

☐ April 15 Quarterly Report

☐ Twelfth day report preceding

(Type of Election)

☐ July 15 Quarterly Report

election on _____ in the State of _____

☐ October 15 Quarterly Report

☐ Thirtieth day report following the General Election on

☒ January 31 Year End Report

in the State of _____

☐ July 31 Mid-Year Report (Non-election Year Only)

☒ Termination Report

This report contains activity for

☒ Primary Election

☐ General Election

☐ Special Election

☐ Runoff Election

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
1-1-89 through 12-31-89		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	-0-	1080.00
(b) Total Contribution Refunds (from Line 20(d))	-0-	-
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	-0-	1080.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)		3124.92
(b) Total Offsets to Operating Expenditures (from Line 14)		10424
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	-0-	3020.68
8. Cash on Hand at Close of Reporting Period (from Line 27)	-0-	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Signature of Treasurer

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3
(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full) .

CE CE ZORINSKY FOR CONGRESS

Report Covering the Period:

From: 7-1-89

To: 12-31-89

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(i) Itemized (use Schedule A)

(ii) Unitemized

(iii) Total of contributions from individuals

(b) Political Party Committees

(c) Other Political Committees (such as PACs)

(d) The Candidate

(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.

13. LOANS:

(a) Made or Guaranteed by the Candidate

(b) All Other Loans

(c) TOTAL LOANS (add 13(a) and (b))

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

15. OTHER RECEIPTS (Dividends, Interest, etc.)

16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)

II. DISBURSEMENTS

17. OPERATING EXPENDITURES

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed by the Candidate

(b) Of All Other Loans

(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees (such as PACs)

(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))

21. OTHER DISBURSEMENTS

REFUND EXCESS CONTRIBUTIONS

22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21).

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD

24. TOTAL RECEIPTS THIS PERIOD (from Line 16)

25. SUBTOTAL (add Line 23 and Line 24)

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25).

COLUMN A
Total This Period

COLUMN B
Calendar Year-To-Date

11(a)(i)

11(a)(ii)

11(a)(iii)

11(b)

11(c)

11(d)

11(e)

12

13(a)

13(b)

13(c)

14

15

16

17

18

19(a)

19(b)

19(c)

20(a)

20(b)

20(c)

20(d)

21

22

23

24

25

26

27

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)

CE CE ZORINSKY FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code CE CE ZORINSKY 8531 HICKORY STREET OMAHA, NEBRASKA 68124 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 9-6-89	Amount of Each Receipt this Period 1000.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

21040322500

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)

CE CE ZORINSKY FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code COMMITTEE TO REELECT SENATOR EDWARD ZORINSKY	Purpose of Disbursement REFUND OF CONTRIBUTION Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9-5-89	Amount of Each Disbursement This Period 1000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

21040322501

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) CELE ZORINSKY FOR CONGRESS		2. FEC IDENTIFICATION NUMBER 124966
ADDRESS (number and street) ☐ Check if different than previously reported. 8531 HICKORY STREET		3. IS THIS REPORT AN AMENDMENT? ☐ YES ☐ NO
CITY, STATE and ZIP CODE OMAHA, NEBRASKA 68124	STATE/DISTRICT NEBRASKA 2ND	

4. TYPE OF REPORT

- ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☒ July 31 Mid-Year Report (Non-election Year Only)
☐ Twelfth day report preceding _____ (Type of Election)
 election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____
 in the State of _____

- ☒ Termination Report
 This report contains activity for ☒ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
1-1-89 through 6-30-89		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	1080.00	1080.00
(b) Total Contribution Refunds (from Line 20(d))		
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	1080.00	1080.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	3124.41	3124.41
(b) Total Offsets to Operating Expenditures (from Line 14)	104.24	104.24
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	3020.68	3020.68
8. Cash on Hand at Close of Reporting Period (from Line 27)	-0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Signature of Treasurer

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

--	--	--	--	--	--	--	--	--	--

FEC FORM 3
(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full)

C.E. CE ZORINSKY FOR CONGRESS

Report Covering the Period:

From: 1-1-89

To: 6-30-89

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			11(a)(i)
(i) Itemized (use Schedule A)			11(a)(ii)
(ii) Unitemized			11(a)(iii)
(iii) Total of contributions from individuals			11(b)
(b) Political Party Committees			11(c)
(c) Other Political Committees (such as PACs)	80.00	80.00	11(d)
(d) The Candidate	24629.74	24629.74	11(e)
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))			
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.	1000.00	1000.00	12
13. LOANS:			
(a) Made or Guaranteed by the Candidate			13(a)
(b) All Other Loans			13(b)
(c) TOTAL LOANS (add 13(a) and (b))			13(c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	104.24	104.24	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)			15
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	23794.03	23794.03	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	3124.92	3124.92	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	9000.00	9000.00	19(a)
(b) Of All Other Loans			19(b)
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))			19(c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			20(a)
(b) Political Party Committees			20(b)
(c) Other Political Committees (such as PACs)			20(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))			20(d)
21. OTHER DISBURSEMENTS <u>REFUND OF EXCESS CONTRIBUTIONS</u>	11500.00	11500.00	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21).	23624.92	23624.92	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	(169.11)	23
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$	23794.03	24
25. SUBTOTAL (add Line 23 and Line 24)	\$	23624.92	25
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).	\$	23624.92	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25).	\$	-0-	27

SCHEDULE A

ITEMS RECEIPTS

to prepare schedule(s)
category of the
Detailed Summary Page

PAGE 1 OF 3
FOR LINE NUMBER 11c

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)

CE DE ZORINSKY FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code ROCKWELL GOUR GOVERNMENT 600 GRANT STREET PITTSBURGH, PA 15219 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer - Occupation - Aggregate Year-to-Date > \$	Date (month, day, year) 2-1-89	Amount of Each Receipt this Period 80.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer - Occupation - Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer - Occupation - Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer - Occupation - Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer - Occupation - Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer - Occupation - Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer - Occupation - Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

80.00

TOTAL This Period (last page this line number only)

80.00

91040322504

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE **2** OF **3**
FOR LINE NUMBER
110

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)

CE CE ZORINSKY FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code CE CE ZORINSKY 8531 HICKORY STREET OMAHA, NEBRASKA 68124 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 6-1-89 6-1-89	Amount of Each Receipt this Period 1110979 11500.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

2260979

TOTAL This Period (last page this line number only)

2260979

21040322505

SCHEDULE A

ITEMIZED RECEIPTS

Indicate schedule(s)
category of the
Detailed Summary Page

PAGE 3 OF 3
FOR LINE NUMBER 12

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)

CE CE ZORINSKY FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code COMMITTEE TO REELECT SENATOR ZORINSKY Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 6-1-89	Amount of Each Receipt this Period 1000.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional) 1000.00

TOTAL This Period (last page this line number only) 1000.00

21040322506

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 3
FOR LINE NUMBER 17

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)

CE CE ZORINSKY FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code SMITH YAPLAN ALLEN 111 SOUTH 108 AVE OMAHA, NEBRASKA 68154	Purpose of Disbursement ADVERTISING Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 1-9-89	Amount of Each Disbursement This Period 3000.00
B. Full Name, Mailing Address and ZIP Code IRS DEOEN, UTAH	Purpose of Disbursement UNEMPLOYMENT TAXES Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 1-22-89	Amount of Each Disbursement This Period 124.92
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

3124.42

TOTAL This Period (last page this line number only)

3124.42

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 2 OF 3
FOR LINE NUMBER
19A

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)

CE CE ZORINSKY FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code <u>CE CE ZORINSKY</u> <u>8531 HICKORY ST</u> <u>OMAHA, NEBRASKA 68114</u>	Purpose of Disbursement <u>REPAYMENT OF</u> <u>LOAN</u> Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) <u>4-10-89</u>	Amount of Each Disbursement This Period <u>9000.00</u>
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

9000.00

TOTAL This Period (last page this line number only)

9000.00

21040322508

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 3 OF 3
FOR LINE NUMBER 21

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)

CE CE ZORINSKY FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code COMMITTEE TO REELECT EDWARD ZORINSKY OMAHA, NEBRASKA 68104	Purpose of Disbursement REFUND EXCESS CONTRIBUTIONS Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 5-31-69	Amount of Each Disbursement This Period 11500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

11500.00

TOTAL This Period (last page this line number only)

11500.00

91040322509

LOANS

Name of Committee (in Full) CE CE ZORINSKY FOR CONGRESS				
A. Full Name, Mailing Address and ZIP Code of Loan Source CECE ZORINSKY 8531 HICKORY ST OMAHA, NEBRASKA 68124	Original Amount of Loan 9000.00	Cumulative Payment To Date 9000.00	Balance Outstanding at Close of This Period - 0 -	
Election: ☒ Primary ☐ General ☐ Other (specify):				
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured				
List All Endorsers or Guarantors (if any) to Item A				
1. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
2. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
3. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify):				
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured				
List All Endorsers or Guarantors (if any) to Item B				
1. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
2. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
3. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
SUBTOTALS This Period This Page (optional)				
TOTALS This Period (last page in this line only)				
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.				

91040322510

DEPOSIT TICKET

CE CE ZORINSKY FOR CONGRESS
7375 PACIFIC ST.
OMAHA, NE 68121

DATE

7-10-85
104000087

SIGN HERE FOR CASH RECEIVED (IF REQUIRED)



PACKERS BANK
AND TRUST CO.
24TH & L STREET, BOX 7948, OMAHA, NE 68107

104000087

⑈104000087⑈5020623⑈010421131⑈0000871403⑈

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE PROVISIONS OF THE UNIFORM COMMERCIAL CODE OR ANY APPLICABLE COLLECTION AGREEMENT

CASH	CURRENCY		
COIN			
U.S. Postal		3	04 21
Green for			
Service		8604	79
TOTAL FROM OTHER SIDE			
TOTAL		8714	03
LESS CASH RECEIVED			
NET DEPOSIT		8714	03

27-8/1040

USE OTHER SIDE FOR
ADDITIONAL LISTING

BE SURE EACH ITEM IS
PROPERLY ENDORSED

DEPOSIT TICKET

CE CE ZORINSKY FOR CONGRESS
7375 PACIFIC ST.
OMAHA, NE 68121

DATE

7-10-85
104000087

SIGN HERE FOR CASH RECEIVED (IF REQUIRED)



PACKERS BANK
AND TRUST CO.
24TH & L STREET, BOX 7948, OMAHA, NE 68107

104000087

⑈104000087⑈5020623⑈010419131⑈0000354000⑈

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE PROVISIONS OF THE UNIFORM COMMERCIAL CODE OR ANY APPLICABLE COLLECTION AGREEMENT

CASH	CURRENCY		
COIN			
ROCKWELL		40	00
ED ZORINSKY			
FOR SENATE		3500	00
TOTAL FROM OTHER SIDE			
TOTAL		3540	00
LESS CASH RECEIVED			
NET DEPOSIT		3540	00

27-8/1040

USE OTHER SIDE FOR
ADDITIONAL LISTING

BE SURE EACH ITEM IS
PROPERLY ENDORSED

21040322511

DEPOSIT TICKET

CE CE ZORINSKY FOR CONGRESS

7375 PACIFIC ST.
OMAHA, NE 68121

DATE 7.25 1988
JUL 26 SE

SIGN HERE FOR CASH RECEIVED (IF REQUIRED)



**PACKERS BANK
AND TRUST CO.**
24TH & L STREET, BOX 7340, OMAHA, NE 68107

CASH	CURRENCY		
	COIN		
<i>McL...</i>		50	00
<i>McL...</i>		2000	00
<i>McL...</i>		24	33
TOTAL FROM OTHER SIDE			
TOTAL			
LESS CASH RECEIVED			
NET DEPOSIT		934	33

27-8/1040

USE OTHER SIDE FOR
ADDITIONAL LISTING

BE SURE EACH ITEM IS
PROPERLY ENDORSED

⑈1040000087⑈5020623⑈010412131⑈0000939238⑈

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE PROVISIONS OF THE UNIFORM COMMERCIAL CODE OR ANY APPLICABLE COLLECTION AGREEMENT

DEPOSIT TICKET

CE CE ZORINSKY FOR CONGRESS

7375 PACIFIC ST.
OMAHA, NE 68121

DATE June 24 1988

SIGN HERE FOR CASH RECEIVED (IF REQUIRED)



**PACKERS BANK
AND TRUST CO.**
24TH & L STREET, BOX 7340, OMAHA, NE 68107

CASH	CURRENCY		
	COIN		
<i>McL...</i>		125	00
<i>McL...</i>		250	00
<i>McL...</i>		250	00
TOTAL FROM OTHER SIDE		4200	00
JUN 24 88		1,925	00
LESS CASH RECEIVED			
NET DEPOSIT		4,200	00

27-8/1040

USE OTHER SIDE FOR
ADDITIONAL LISTING

BE SURE EACH ITEM IS
PROPERLY ENDORSED

⑈1040000087⑈5020623⑈010410131⑈0000492500⑈

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE PROVISIONS OF THE UNIFORM COMMERCIAL CODE OR ANY APPLICABLE COLLECTION AGREEMENT

21040322512

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <u>COMMITTEE TO RE-ELECT FORD WISKEY</u>		2. FEC IDENTIFICATION NUMBER <u>5-2118 / C00032862</u>
ADDRESS (number and street) ☐ Check if different than previously reported. <u>900 SO. 74TH AVE, SUITE 400</u>		3. IS THIS REPORT AN AMENDMENT? ☐ YES ☒ NO
CITY, STATE and ZIP CODE <u>OMAHA, NE 68114</u>	STATE/DISTRICT	

4. TYPE OF REPORT

- ☐ April 15 Quarterly Report ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☒ January 31 Year End Report
- ☐ July 31 Mid-Year Report (Non-election Year Only) ☐ Termination Report

This report contains activity for ☐ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>7-1-89</u> through <u>12-31-89</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	-0-	-0-
(b) Total Contribution Refunds (from Line 20(d))		
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	-0-	-0-
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17).	2,526.77	4,935.36
(b) Total Offsets to Operating Expenditures (from Line 14)		
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a)).	2,526.77	4,935.36
8. Cash on Hand at Close of Reporting Period (from Line 27)	133,941.29	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

MICHAEL N. ABRAMSON

Signature of Treasurer

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3
(revised 4/87)

*** AMENDED ***
DETAILED SUMMARY PAGE
of Receipts and Disbursements
(PAGE 2, FEC FORM 3)

Name of Committee (in full)

COMMITTEE TO RE-ELECT BORDENSKY

Report Covering the Period:

From: **7-1-89**

To: **12-31-89**

I. RECEIPTS		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees				11(a)(i)
(i) Itemized (use Schedule A)				11(a)(ii)
(ii) Unitemized				11(a)(iii)
(iii) Total of contributions from individuals				11(b)
(b) Political Party Committees				11(c)
(c) Other Political Committees (such as PACs)				11(d)
(d) The Candidate				11(e)
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))				
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.				12
13. LOANS:				
(a) Made or Guaranteed by the Candidate				13(a)
(b) All Other Loans				13(b)
(c) TOTAL LOANS (add 13(a) and (b))				13(c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)				14
15. OTHER RECEIPTS (Dividends, Interest, etc.)				15
INTEREST 5329.37		6,329.37	23,504.87	
REFUND 1000.00				
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)		6,329.37	23,504.87	16
II. DISBURSEMENTS				
17. OPERATING EXPENDITURES		2,526.77	4,935.36	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.			1,000.00	18
19. LOAN REPAYMENTS:				
(a) Of Loans Made or Guaranteed by the Candidate				19(a)
(b) Of All Other Loans				19(b)
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))				19(c)
20. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees				20(a)
(b) Political Party Committees				20(b)
(c) Other Political Committees (such as PACs)				20(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))				20(d)
21. OTHER DISBURSEMENTS		1,000.00	23,609.79	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)		3,526.77	29,545.15	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 131,138.69	23
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$ 6,329.37	24
25. SUBTOTAL (add Line 23 and Line 24)	\$ 137,468.06	25
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$ 3,526.77	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$ 133,941.29	27

LE A

ITEMIZED RECEIPTS

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

 PAGE 1 OF 1
FOR LINE NUMBER 15

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)

COMMITTEE TO RE-ELECT ZODINSKY

A. Full Name, Mailing Address and ZIP Code CELE ZODINSKY FOR CONGRESS 8591 HICKORY ST. OMAHA, NE. 68124	Name of Employer N/A Occupation N/A	Date (month, day, year) 9-6-89	Amount of Each Receipt this Period 1,000.00
Receipt For: ☐ Primary ☐ General ☒ Other (specify): REFUND OF EXCESS CONTRIBUTION	Aggregate Year-to-Date > \$		
B. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

1,000.00

TOTAL This Period (last page this line number only)

1,000.00

91040322515

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)

COMMITTEE TO RE-ELECT ZODZINSKY

A. Full Name, Mailing Address and ZIP Code FRANKEL, ZACHARIA, NICHOL & STAMP 900 SO. 74TH PLZ OMAHA, NE. 68114	Purpose of Disbursement PROFESSIONAL FEE Disbursement for: ☐ Primary ☐ General ☒ Other (specify) OTHER ACTIVITY	Date (month, day, year) 7-13-89 8-15-89 9-20-89 10-13-89 12-27-89	Amount of Each Disbursement This Period 125.00 940.50 400.00 23.88 940.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

2,517.50

TOTAL This Period (last page this line number only)

2,517.50

91040322516

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 21

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)

COMMITTEE TO RE-ELECT ZORZINSKY

A. Full Name, Mailing Address and ZIP Code CELE ZORZINSKY 8531 HICKORY ST. OMAHA, NE. 68124	Purpose of Disbursement TRANSFER TO SEN. ZORZINSKY'S WIDOW PURSUANT TO ADVISORY OPINION 1992-11 Disbursement for: ☐ Primary ☐ General ☒ Other (specify) OTHER ACTIVITY	Date (month, day, year) 9-6-89	Amount of Each Disbursement This Period 1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

1,000.00

TOTAL This Period (last page this line number only)

1,000.00

21040322517

REF ID: A66000 RECEIPTS AND DISBURSMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) COMMITTEE TO RE-ELECT ZORINSKY		2. FEC IDENTIFICATION NUMBER 5-2118/C00032862
ADDRESS (number and street) ☐ Check if different than previously reported. 900 SO. 74th PLZ, SUITE 400		3. IS THIS REPORT AN AMENDMENT? ☐ YES ☒ NO
CITY, STATE and ZIP CODE OMAHA, NE.	STATE/DISTRICT 68114	

4. TYPE OF REPORT

- ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☒ July 31 Mid-Year Report (Non-election Year Only)
☐ Twelfth day report preceding _____ (Type of Election)
 election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____ in the State of _____
☐ Termination Report

This report contains activity for ☐ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
1-1-89 through 6-30-89		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	-0-	-0-
(b) Total Contribution Refunds (from Line 20(d))		
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	-0-	-0-
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	2,408.59	2,408.59
(b) Total Offsets to Operating Expenditures (from Line 14)		
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	2,408.59	2,408.59
8. Cash on Hand at Close of Reporting Period (from Line 27)	131,138.69	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

MICHAEL N. ABRAMSON

Signature of Treasurer

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3
(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full)

COMMITTEE TO RE-ELECT ZODINSKY

Report Covering the Period:

From: 1-1-89

To: 6-30-89

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)			11(a)(i)
(ii) Unitemized			11(a)(ii)
(iii) Total of contributions from individuals			11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) The Candidate			11(d)
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))			11(e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate			13(a)
(b) All Other Loans			13(b)
(c) TOTAL LOANS (add 13(a) and (b))			13(c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			14
15. OTHER RECEIPTS (Dividends, Interest, etc.)			
INTEREST 5675.50	17,175.50	17,175.50	15
REFUND OF EXCESS CONTRIBUTION 11,500.00			
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	17,175.50	17,175.50	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	2,408.59	2,408.59	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.	1,000.00	1,000.00	18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			19(a)
(b) Of All Other Loans			19(b)
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))			19(c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			20(a)
(b) Political Party Committees			20(b)
(c) Other Political Committees (such as PACs)			20(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))			20(d)
21. OTHER DISBURSEMENTS	22,609.79	22,609.79	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21).	26,018.38	26,018.38	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 139,981.57		23
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$ 17,175.50		24
25. SUBTOTAL (add Line 23 and Line 24)	\$ 157,157.07		25
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$ 26,018.38		26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$ 131,138.69		27

91540322519

SCHEDULE A

ITEM RECEIPTS

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)

COMMITTEE TO RE-ELECT ZORINSKY

A. Full Name, Mailing Address and ZIP Code CECE ZORINSKY FOR CONGRESS 8531 HICKORY ST. OMAHA, NE. 68124	Name of Employer N/A	Date (month, day, year) 6-789	Amount of Each Receipt this Period 11,500.00
Receipt For: ☐ Primary ☐ General ☒ Other (specify): REFUND OF EXCESS CONTRIBUTION	Occupation N/A	Aggregate Year-to-Date > \$	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)	11,500.00
TOTAL This Period (last page this line number only)	11,500.00

91040322520

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 17

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)

COMMITTEE TO RE-ELECT ZORINSKY

A. Full Name, Mailing Address and ZIP Code FRANKEL, ZACHARIA, NITEN & STAMP 900 SO. 74TH PLZ #400 OMAHA, NE. 68114	Purpose of Disbursement PROFESSIONAL FEE Disbursement for: ☐ Primary ☐ General ☒ Other (specify) OTHER ACTIVITY	Date (month, day, year) 1-9-89 3-6-89 3-3-89 5-17-89	Amount of Each Disbursement This Period 125.00 150.00 125.00 122.00
B. Full Name, Mailing Address and ZIP Code INTERNAL REVENUE SERVICE OGDEN, UT. 84201	Purpose of Disbursement FEDERAL TAXES Disbursement for: ☐ Primary ☐ General ☒ Other (specify) OTHER ACTIVITY	Date (month, day, year) 3-9-89	Amount of Each Disbursement This Period 1,427.00
C. Full Name, Mailing Address and ZIP Code NEBR. DEPT. OF REVENUE P.O. BOX 94818 LINCOLN, NE. 68509	Purpose of Disbursement STATE TAXES Disbursement for: ☐ Primary ☐ General ☒ Other (specify) OTHER ACTIVITY	Date (month, day, year) 3-9-89	Amount of Each Disbursement This Period 452.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

2,401.00

TOTAL This Period (last page this line number only)

2,401.00

21040322521

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE OF

FOR LINE NUMBER

18

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)

COMMITTEE TO RE-ELECT ZORINSKY

A. Full Name, Mailing Address and ZIP Code CELE ZORINSKY FOR CONGRESS 8531 HICKORY ST. OMAHA, NE 68124	Purpose of Disbursement TRANSFER TO COMM. Disbursement for: ☐ Primary ☐ General ☒ Other (specify) OTHER ADDRESS	Date (month, day, year) 6-1-89	Amount of Each Disbursement This Period 1000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

1,000.00

TOTAL This Period (last page this line number only)

1,000.00

21040322522

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 21

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)

COMMITTEE TO RE-ELECT ZORINSKY

A. Full Name, Mailing Address and ZIP Code CELE ZORINSKY 8531 HICKORY ST. OMAHA, NE. 68124	Purpose of Disbursement TRANSFER TO SENATOR ZORINSKY WIDOW PURSUANT TO ADVISORY OPINION 1997-11 Disbursement for: ☐ Primary ☐ General ☒ Other (specify) OTHER ACTIVITY	Date (month, day, year) 6-1-89 6-1-89	Amount of Each Disbursement This Period 11,500.00 11,109.79
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☒ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

22,609.79

TOTAL This Period (last page this line number only)

22,609.79

21040322523

OGC 7010

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 JUL 23 PM 12:19

BRODKEY & PAVEL, P.C.
ATTORNEYS AT LAW
SUITE 200 LAKE REGENCY BUILDING
444 REGENCY PARKWAY DRIVE
OMAHA, NEBRASKA 68114-3755

BRUCE H. BRODKEY
DAVID E. PAVEL
MARK A. SMITH

TELEPHONE: (402) 397-2000
TELECOPIER: (402) 397-0803

July 20, 1990

Mr. Anthony Buckley
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2987 Committee to Re-Elect
Senator Zorinsky and CeCe Zorinsky for Congress

Dear Mr. Buckley:

I note from my file that I have not heard from you since my letter of May 22, 1990 (copy attached). At your convenience, would you please provide me an update on the status of this matter. Please rest assured that my client is very desirous of concluding this matter in the near future. I thank you for your continued cooperation.

Yours very truly,


Bruce H. Brodkey

BHB:dat

Enclosure

cc: Mr. Alvin Abrahamson

90 JUL 23 PM 3:38
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91040522524

BATT & BRODKEY
ATTORNEYS
400 CONTINENTAL BUILDING
OMAHA, NEBRASKA 68102-1757
(402) 346-2000

LAWRENCE I. BATT, P.C.
BRUCE H. BRODKEY, P.C.
THOMAS P. KENNY
MARK A. SMITH

Fax (402) 346-4108

May 22, 1990

Mr. Anthony Buckley
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2987 Committee to Re-Elect
Senator Zorinsky and CeCe Zorinsky for Congress

Dear Mr. Buckley:

As you recall I represent both the Committee to Re-Elect Senator Edward Zorinsky and CeCe Zorinsky for Congress Committee with reference to finding of Federal Election Commissions that probable cause exists to believe that the Campaign Committees and their respective treasurers may have violated the provisions of 2 U.S.C. Sec. 441a(a)(1)(A).

The Committee to Re-Elect Senator Zorinsky has admitted it inadvertently disbursed \$12,500.00 to CeCe Zorinsky for Congress Committee during the year 1988. Additionally, and beyond the scope of the initial Commission inquiry, it appears that in January and April of 1989, a total of \$12,109.79 was deposited to the CeCe Zorinsky for Congress Committee from funds held by the Committee to Re-Elect Senator Zorinsky. The purpose of this letter is to forthrightly discuss the remedial action taken by the Committees with reference to those distributions.

I have reviewed the actions taken with representatives of the committees and I am pleased to enclose with this letter some documents prepared by Mr. Michael Abramson of the Committee to Re-Elect Senator Zorinsky. These include a cover sheet breaking down the transactions, together with a work paper and "Reports of Receipts and Disbursements" for both the Zorinsky for Congress and the Committee to Re-Elect Zorinsky (FEC Form 3) filed by the committees for both halves of the 1989 calendar year.

A careful review of the materials enclosed shows that CeCe Zorinsky contributed \$11,500.00 to her committee. In turn the committee refunded that amount of the excess contribution to the Ed Zorinsky committee which in turn paid CeCe Zorinsky \$11,500.00 as a reimbursement. This reimbursement we understand to be entirely within the federal election laws and regulations in

21040325

Mr. Anthony Buckley
May 22, 1990
Page 2

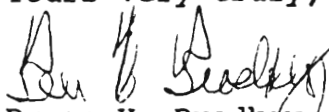
accordance with the opinion letter of June 12, 1987 from the Federal Election Commission.

With respect to the deposit of \$12,109.79 into the CeCe Zorinsky campaign (deposit tickets attached), CeCe Zorinsky contributed \$11,109.79 to her campaign to pay off various campaign debts. The Ed Zorinsky committee reimbursed her for that sum and then contributed \$1,000.00 to her committee. We believe that the \$1,000.00 campaign contribution from one campaign committee to another is within the allowable limits of federal law.

Finally, the excess contribution of \$1,000.00 (considered as part of the \$12,500.00 contribution) was returned by the CeCe Zorinsky for Congress Committee to the Zorinsky for Senate Committee in the second half of 1989, all as disclosed by the attached FEC Form 3s. As a result, any claim of excess contributions has now been rectified by the two Committees and the individual.

The Committees which I represent are still desirous of working towards a conciliation of the Commission's claims and would appreciate hearing from your office at your early convenience. If you should have any additional inquiries, please do not hesitate to call me.

Yours very truly,


Bruce H. Brodkey, P.C.

BHB:ekm
enclosures
cc: Michael N. Abramson

21040322526



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS *RAH*
COMMISSION SECRETARY

DATE: AUGUST 7, 1990

SUBJECT: MUR 2987 - GENERAL COUNSEL'S REPORT
DATED AUGUST 1, 1990

The above-captioned document was circulated to the
Commission on Thursday, August 2, 1990 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	<u>XXX</u>
Commissioner Elliott	<u>XXX</u>
Commissioner Josefiak	<u>XXX</u>
Commissioner McDonald	<u>XXX</u>
Commissioner McGarry	<u> </u>
Commissioner Thomas	<u>XXX</u>

This matter will be placed on the meeting agenda
for TUESDAY, AUGUST 14, 1990.

Please notify us who will represent your Division before the
Commission on this matter.

21040322527

90 AUG -2 AM 10:06

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-Elect)
Senator Zorinsky and Michael N.)
Abramson, as treasurer;) MUR 2987
CeCe Zorinsky for Congress and)
Edward A. Kahout, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Committee to Re-Elect Senator Zorinsky contributed \$3,500 to CeCe Zorinsky for Congress on June 28, 1988. In addition, the Committee to Re-Elect Senator Zorinsky contributed another \$9,000 to CeCe Zorinsky for Congress on July 28, 1988, for a total of \$12,500. These transactions were timely disclosed by both committees on their respective reports of disbursements and receipts.

On June 1, 1989, the Committee to Re-Elect Senator Zorinsky received a refund from CeCe Zorinsky for Congress in the amount of \$11,500, which represented the excessive portion of the above contributions. On the same day, however, the Committee to Re-Elect Senator Zorinsky made separate disbursements of \$11,109.79 and \$11,500, each to CeCe Zorinsky in her individual capacity. A notation stated that these transfers were made "to Senator Zorinsky's widow pursuant to Advisory Opinion 1987-11."¹

1. On April 20, 1987 and May 8, 1987, George Kubat, then treasurer of the Committee to Re-Elect Senator Zorinsky, requested an advisory opinion concerning the propriety of certain plans being considered for disposing of excess campaign funds remaining in the Committee to Re-Elect Senator Zorinsky's account at Senator Zorinsky's death. In AO 1987-11, the Commission advised the Committee to Re-Elect Senator Zorinsky that excess campaign funds

91040322528

CeCe Zorinsky contemporaneously turned these amounts over to CeCe Zorinsky for Congress. Again, these transactions were timely reported on the proper reports by the respective committees.

On June 1, 1989, the Committee to Re-Elect Senator Zorinsky made an additional contribution of \$1,000 to CeCe Zorinsky for Congress. This contribution was refunded to the Committee to Re-Elect Senator Zorinsky on September 6, 1989. Likewise, on this same date, the Committee to Re-Elect Senator Zorinsky disbursed \$1,000 to CeCe Zorinsky as the widow of Senator Zorinsky, again pursuant to Advisory Opinion 1987-11. Also on September 6, 1989, CeCe Zorinsky contributed \$1,000 to her own committee. As with the others, these transactions were timely reported on the proper reports by the respective committees.

Prior to the submission of the reports disclosing these latter transactions, the Commission, on October 10, 1989, found that there was reason to believe the Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A) by making an excessive contribution in the amount of \$11,500 to CeCe Zorinsky for Congress for the 1988 Nebraska primary election, and that CeCe Zorinsky for Congress

(Footnote 1 continued from previous page)
could be transferred to CeCe Zorinsky in her capacity as the senator's widow without such transfer being subject to the contribution limits of the Act or regulations. However, the Commission further noted that any use of the excess campaign funds which involved contributions to a political committee would be subject to the contribution limitations of the Act. The specific issue of contributions by Mrs. Zorinsky to her own campaign was not raised and thus not addressed.

and Edward A. Kahout, as treasurer, violated 2 U.S.C. § 441a(f) by accepting this excessive contribution.

II. ANALYSIS

Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person may contribute more than \$1,000 to any candidate and her authorized political committee with respect to any election for Federal office. A political committee is considered a person. See 2 U.S.C. § 431(11). Pursuant to 2 U.S.C. § 441a(f), it is unlawful for any committee to knowingly accept any contribution which exceeds the limitations established by the Act. Pursuant to 11 C.F.R. § 110.10(a), a candidate for Federal office may make unlimited expenditures from his or her personal funds, including disbursements to the candidate's authorized political committees. "Personal funds" consist of

any assets which ... at the time he or she became a candidate, the candidate had legal right of access to or control over, and with respect to which the candidate had either: legal and rightful title, or an equitable interest. ['Personal funds' include] [s]alary and other earned income from bona fide employment; dividends and proceeds from the sale of the candidate's stocks or other investments; bequests to the candidate; income from trusts established before candidacy; income from trusts established by bequest after candidacy of which the candidate is the beneficiary; gifts of a personal nature which had been customarily received prior to candidacy; proceeds from lotteries and similar legal games of chance.

11 C.F.R. § 110.10(b)(1)-(2). Pursuant to 2 U.S.C. § 432(e)(2), a candidate who receives a contribution in connection with his or her campaign for election shall be considered as having

9104002350

received the contribution as an agent of his or her authorized committee.

On October 26, 1989, this Office received a designation of counsel form and a request for pre-probable cause conciliation from the treasurer of the Committee to Re-Elect Senator Zorinsky. In that letter, Mr. Abramson stated that "[a]fter we learned that these contributions were in excess of the legal limit, the Committee to Re-Elect Senator Zorinsky immediately requested a refund of these monies from the CeCe Zorinsky for Congress Committee and then redistributed these amounts to Mrs. Zorinsky personally."

Although this letter purported to designate counsel and to request pre-probable cause conciliation on behalf of both committees, it was unclear to this Office whether Mr. Abramson had the authority to take these actions on behalf of CeCe Zorinsky for Congress. These concerns were addressed to that committee, and on December 15, 1989, this Office received an appropriate designation of counsel from CeCe Zorinsky for Congress. Subsequently, on January 2, 1990, this Office received a letter from counsel for CeCe Zorinsky for Congress requesting pre-probable cause conciliation.

On May 29, 1990, a response was received on behalf of all Respondents with regard to the Commission's reason to believe determinations. Attachment 1. According to this submission, the Committee to Re-Elect Senator Zorinsky initially made the excessive contribution totalling \$12,500 to CeCe Zorinsky for Congress in June and July, 1988. Subsequently, on June 1, 1989,

31040322531

CeCe Zorinsky assertedly contributed \$11,500 of her own money to CeCe Zorinsky for Congress. CeCe Zorinsky for Congress used this money on June 1, 1989, to reimburse the Committee to Re-Elect Senator Zorinsky for its excessive contribution. Then, assertedly pursuant to Advisory Opinion 1987-11, the Committee to Re-Elect Senator Zorinsky disbursed \$11,500 to CeCe Zorinsky, leaving CeCe Zorinsky for Congress with a \$1,000 contribution from the Senate committee.

21040322532
Likewise, according to the submission, and attached committee reports, CeCe Zorinsky contributed an additional \$11,109.79 to CeCe Zorinsky for Congress on June 1, 1989, to pay off campaign debts. On the same date, the Committee to Re-Elect Senator Zorinsky disbursed \$11,109.79 to CeCe Zorinsky personally to reimburse her for the amount of her contribution, and contributed \$1,000 directly to CeCe Zorinsky for Congress. Respondents' submission does not address the transactions occurring in September, 1989.

Respondents suggest that the disbursements by the Committee to Re-Elect Senator Zorinsky to CeCe Zorinsky were not related to the contributions by CeCe Zorinsky to CeCe Zorinsky for Congress. However, Respondents admit that the amounts paid to CeCe Zorinsky were "reimbursements" which were meant to make up for the amounts she turned over to her own committee. In effect, the amounts paid to CeCe Zorinsky personally were meant to be contributions from the Committee to Re-Elect Senator Zorinsky to CeCe Zorinsky for Congress made through CeCe Zorinsky.

2104032253
Although the Committee to Re-Elect Senator Zorinsky was permitted to provide these funds to CeCe Zorinsky in her personal capacity pursuant to Advisory Opinion 1987-11, that same advisory opinion listed several options available to the Committee to Re-Elect Senator Zorinsky in disposing of excess campaign funds which would not have resulted in the funds being disbursed to CeCe Zorinsky. Thus, prior to her receipt of these funds, CeCe Zorinsky would not have had "legal right of access to or control over" these funds. Likewise, prior to her receipt of these funds, she would not have had "legal and rightful title or an equitable interest." As CeCe Zorinsky filed her Statement of Candidacy with the Commission on January 19, 1988, and all funds received by her from the Committee to Re-Elect Senator Zorinsky were received after this date, such funds cannot be considered to have been "personal funds" under 11 C.F.R. § 110.10(b). Thus CeCe Zorinsky could not, upon receipt of the funds from the Committee to Re-Elect Senator Zorinsky, turn them over to her own committee as her own funds. Rather, she acted as an agent of her committee in receiving funds from the Committee to Re-Elect Senator Zorinsky.

It thus appears that, upon further examination, the amounts of excessive contributions at issue have increased since the Commission's reason to believe determination so as to include all funds given to CeCe Zorinsky and/or CeCe Zorinsky for Congress by the Committee to Re-Elect Senator Zorinsky which are in excess of the \$1,000 limitation at 2 U.S.C. § 441a(a)(1)(A).

This amount totals \$23,609.79.² While the amount has changed, the violations involved, acceptance and receipt of an excessive contribution, have not. Accordingly, this Office recommends that the Commission enter into conciliation with all Respondents prior to findings of probable cause to believe. There is no evidence that any refund of any amount of these excessive contributions have been made by CeCe Zorinsky for Congress.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

2. Three separate contributions compose this total. The first amount, \$11,500, results from the \$12,500 in contributions made by the Committee to Re-Elect Senator Zorinsky to CeCe Zorinsky for Congress in 1988 which was refunded in 1989 and the later disbursement of \$11,500 by the Committee to Re-Elect Senator Zorinsky to CeCe Zorinsky and her subsequent payment of this same amount to her own committee. The second amount composing this total, \$11,109.79, results from the disbursement of this amount from the Committee to Re-Elect Senator Zorinsky to CeCe Zorinsky on the same date that CeCe Zorinsky had separately contributed this same amount to CeCe Zorinsky for Congress. The third amount composing this total, \$1,000, results from the direct contribution of \$1,000 by the Committee to Re-Elect Senator Zorinsky to CeCe Zorinsky for Congress, the subsequent refund of this contribution, the subsequent disbursement of \$1,000 to CeCe Zorinsky by the Committee to Re-Elect Senator Zorinsky, and the resulting contribution by CeCe Zorinsky of \$1,000 to CeCe Zorinsky for Congress.

2 1 0 4 0 3 2 2 5 3 4

IV. RECOMMENDATIONS

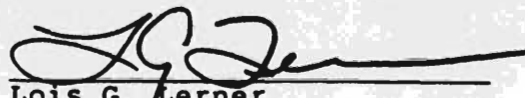
1. Enter into conciliation with the Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer, prior to a finding of probable cause to believe.
2. Enter into conciliation with CeCe Zorinsky for Congress and Edward A. Kahout, as treasurer, prior to a finding of probable cause to believe.
3. Approve the attached proposed conciliation agreements and appropriate letters.

Lawrence M. Noble
General Counsel

Date

8/1/90

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Designations of Counsel and Requests for Conciliation
2. Submission by Respondents
3. Proposed Conciliation Agreements (2)

Staff assigned: T. Buckley

21040322535

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Committee to Re-Elect Senator Zorinsky
and Michael N. Abramson, as treasurer;
CeCe Zorinsky for Congress and
Edward A. Kahout, as treasurer

)
) MUR 2987
)
)
)
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session on
August 16, 1990, do hereby certify that the Commission
decided by a vote of 6-0 to take the following actions
in MUR 2987:

1. Enter into conciliation with the
Committee to Re-Elect Senator Zorinsky
and Michael N. Abramson, as treasurer,
prior to a finding of probable cause
to believe.
2. Enter into conciliation with CeCe
Zorinsky for Congress and Edward A.
Kahout, as treasurer.

(continued)

21040322536

Federal Election Commission
Certification for MUR 2987
August 16, 1990

Page 2

3. Approve the proposed conciliation agreements and letters as recommended in the General Counsel's report dated August 1, 1990,

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

8-22-90
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

21040322537



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 28, 1990

Bruce H. Brodkey, Esq.
Brodkey & Pavel, P.C.
Suite 200, Lake Regency Building
444 Regency Parkway Drive
Omaha, NE 68114-3755

RE: MUR 2987
CeCe Zorinsky for Congress
and Edward A. Kahout, as
treasurer

Dear Mr. Brodkey:

On October 10, 1989, the Federal Election Commission found reason to believe that CeCe Zorinsky for Congress and Edward A. Kahout, as treasurer, violated 2 U.S.C. § 441a(f). At your request, on August 16, 1990, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Tony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

21040322538



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 28, 1990

Bruce H. Brodkey, Esq.
Brodkey & Pavel, P.C.
Suite 200, Lake Regency Building
444 Regency Parkway Drive
Omaha, NE 68114-3755

RE: MUR 2987
Committee to Re-Elect Senator
Zorinsky and Michael N.
Abramson, as treasurer

Dear Mr. Brodkey:

On October 10, 1989, the Federal Election Commission found reason to believe that the Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A). At your request, on August 16, 1990, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Tony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

91040322539



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 4, 1990

Bruce H. Brodkey, Esq.
Brodkey & Pavel, P.C.
Suite 200, Lake Regency Building
444 Regency Parkway Drive
Omaha, NE 68114-3755

RE: MUR 2987
CeCe Zorinsky for Congress
and Edward A. Kohout, as
treasurer; Committee to
Re-Elect Senator Zorinsky and
Michael N. Abramson, as
treasurer

Dear Mr. Brodkey:

Pursuant to your request, enclosed please find a copy of the Commission's Advisory Opinion 1981-15, which we briefly discussed in our telephone conversation on October 1, 1990. If you wish to discuss this matter further after having reviewed this Advisory Opinion, or otherwise wish to discuss the language of the proposed conciliation agreements for the respondents in this matter, please contact me at (202) 376-8200.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tony Buckley", is written over a horizontal line.

Tony Buckley
Attorney

Enclosure
Advisory Opinion

91040322540



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 16, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bruce H. Brodkey, Esq.
Brodkey & Pavel, P.C.
Suite 200, Lake Regency Building
444 Regency Parkway Drive
Omaha, NE 68114-3755

RE: MUR 2987
CeCe Zorinsky for Congress
and Edward A. Kohout, as
treasurer

Dear Mr. Brodkey:

On July 19, 1990, CeCe Zorinsky for Congress ("Committee") requested permission from the Federal Election Commission to terminate pursuant to 2 U.S.C. § 433(d) and 11 C.F.R. § 102.3. On November 2, 1990, the Commission's Reports Analysis Division sent a letter to the Committee authorizing the requested termination.

This is to confirm that, as a result of your telephone conversation with Tony Buckley of this Office on November 13, 1990, you are aware that the November 2, 1990 letter was sent in error. Because of the ongoing enforcement matter involving the Committee, the Committee is not authorized to terminate at this time. Therefore, the Committee must continue to file all the required reports with the Commission until such time as the enforcement matter has been closed as to the Committee.

If you have any questions, please contact Tony Buckley at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

91040322541

06-8772

BRUCE H. BRODKEY, P.C.

ATTORNEYS AT LAW
SUITE 200, LAKE REGENCY BUILDING
444 REGENCY PARKWAY DRIVE
OMAHA, NEBRASKA 68114-3755

90 NOV 29 AM 11:21

BRUCE H. BRODKEY
MARK A. SMITH

TELEPHONE (402) 397-2000
TELECOPIER (402) 397-0803

November 28, 1990

VIA FEDERAL EXPRESS

Mr. Tony Buckley
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

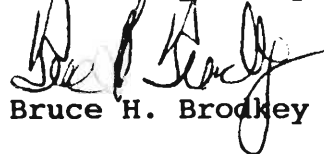
RE: MUR 2987
Committee to Re-Elect Senator Zorinsky and
Michael N. Abramson
CeCe Zorinsky for Congress and
Alvin Abramson

Dear Mr. Buckley:

This letter will acknowledge receipt of the two conciliation agreements for the Respondent's signature. In accordance with your request, we are returning the conciliation agreements signed where applicable by Messrs. Alvin Abramson and Michael N. Abramson where indicated. I understand that you will now present these final conciliation agreements to the Election Commission with the hopes that this conciliation agreement will now be approved.

Please be certain to contact me if you should have any additional inquiries. Assuming that the Federal Election Commission approves the conciliation agreement, please be certain to send me signed copies of each conciliation agreement.

Yours very truly,


Bruce H. Brodkey

BHB:dat

Enclosures

cc: Mr. Michael N. Abramson

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
90 NOV 29 AM 12:12

21040322542

90 DEC 14 PM 3:21

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Committee to Re-Elect	)	
Senator Zorinsky and Michael N.	)	
Abramson, as treasurer;	)	MUR 2987
CeCe Zorinsky for Congress and	)	
Alvin Abramson, as treasurer	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached are two conciliation agreements. The first conciliation agreement has been signed by Bruce H. Brodkey and Michael N. Abramson, the counsel and treasurer respectively of the Committee to Re-Elect Senator Zorinsky, and relates to that committee's violation of 2 U.S.C. § 441a(a)(1)(A).

Attachment 1. The second conciliation agreement has been signed by Bruce H. Brodkey and Alvin Abramson, the counsel and treasurer respectively of CeCe Zorinsky for Congress, and relates to that committee's violation of 2 U.S.C. § 441a(f).

Attachment 2.

II. ANALYSIS

A. Conciliation

91040322543

91040322544

B. Additional Violation

CeCe Zorinsky for Congress recently submitted an amendment to its Statement of Organization, stating that, effective January 1, 1990, Alvin Abramson became that committee's

21040322545
treasurer.¹ The notification is dated November 7, 1990. This constitutes a violation of 2 U.S.C. § 433(c), which states that "[a]ny change in information previously submitted in a statement of organization shall be reported . . . no later than 10 days after the date of the change." Accordingly, this Office recommends that the Commission find reason to believe that CeCe Zorinsky for Congress and Alvin Abramson, as treasurer, violated 2 U.S.C. § 433(c) by failing to timely file an amendment to that committee's Statement of Organization, and approve the attached Factual and Legal Analysis for those respondents.

However, because CeCe Zorinsky for Congress has shown no activity since the 1989 Year-End Report, and because Alvin Abramson did sign the 1989 Year-End Report as treasurer, the failure to amend the Statement of Organization, while a technical violation, is irrelevant. Accordingly, this Office also recommends that the Commission take no further action against CeCe Zorinsky for Congress and Alvin Abramson, as treasurer, as regards this violation. Because these are the only respondents, this Office further recommends that the Commission close the file in this matter.

III. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer. Attachment 1.

1. Because CeCe Zorinsky was a candidate for a House of Representatives seat, the amendment to her principal campaign committee's Statement of Organization is properly filed with the Clerk of the House of Representatives. See 2 U.S.C. § 432(g)(1). The amendment has been forwarded to the Clerk of the House of Representatives for proper filing.

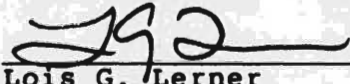
2. Accept the attached conciliation agreement with CeCe Zorinsky for Congress and Alvin Abramson, as treasurer. Attachment 2.
3. Find reason to believe that CeCe Zorinsky for Congress and Alvin Abramson, as treasurer, violated 2 U.S.C. § 433(c).
4. Take no further action against CeCe Zorinsky for Congress and Alvin Abramson, as treasurer, regarding the violation of 2 U.S.C. § 433(c).
5. Close the file.
6. Approve the attached Factual and Legal Analysis and the appropriate letters.

Lawrence M. Noble
General Counsel

Date

12/13/90

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement with the Committee to Re-Elect Senator Zorinsky
2. Conciliation Agreement with CeCe Zorinsky for Congress
3. Factual and Legal Analysis

Staff Assigned: Tony Buckley

91040322546

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Committee to Re-Elect)
Senator Zorinsky and Michael N.)
Abramson, as treasurer;)
CeCe Zorinsky for Congress and)
Alvin Abramson, as treasurer.)

MUR 2987

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 19, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2987:

1. Accept the conciliation agreement with the Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer.
2. Accept the conciliation agreement with CeCe Zorinsky for Congress and Alvin Abramson, as treasurer.
3. Find reason to believe that CeCe Zorinsky for Congress and Alvin Abramson, as treasurer, violated 2 U.S.C. § 433(c).
4. Take no further action against CeCe Zorinsky for Congress and Alvin Abramson, as treasurer, regarding the violation of 2 U.S.C. 433(c).

(Continued)

91040322547

Federal Election Commission
Certification for MUR 2987
December 19, 1990

Page 2

5. Close the file.
6. Approve the Factual and Legal Analysis and the appropriate letters, as recommended in the General Counsel's Report dated December 13, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, and Thomas voted affirmatively for the decision; Commissioner McGarry did not cast a vote.

Attest:

12-19-90

Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat:
Circulated to the Commission:
Deadline for vote:

Fri., Dec. 14, 1990 3:21 p.m.
Mon., Dec. 17, 1990 11:00 a.m.
Wed., Dec. 18, 1990 11:00 a.m.

dr

31540322548

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

90DEC24 AM 9:46

BRUCE H. BRODKEY, P.C.

ATTORNEYS AT LAW
SUITE 200, LAKE REGENCY BUILDING
444 REGENCY PARKWAY DRIVE
OMAHA, NEBRASKA 68114-3755

BRUCE H. BRODKEY
MARK A. SMITH

TELEPHONE (402) 397-2000
TELECOPIER (402) 397-0800

December 21, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
90 DEC 26 PM 12:21

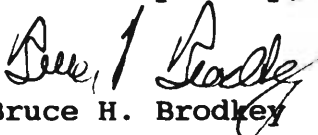
Mr. Tony Buckley
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2987
Committee to Re-Elect Senator Zorinsky and
Michael N. Abramson
CeCe Zorinsky for Congress and
Alvin Abramson

Dear Mr. Buckley:

I do not believe that I have heard from you since my letter of November 28, 1990, enclosing the two conciliation agreements containing Respondent's signatures. At your convenience would you please advise whether the Federal Election Commission has approved the conciliation agreements. I thank you for your cooperation.

Yours very truly,


Bruce H. Brodkey

BHB:dat

cc: Mr. Alvin Abramson
Mr. Michael Abramson

91040822549



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 26, 1990

Bruce H. Brodkey, Esq.
Brodkey & Pavel, P.C.
Suite 200, Lake Regency Building
444 Regency Parkway Drive
Omaha, NE 68114-3755

RE: MUR 2987
CeCe Zorinsky for Congress
and Alvin Abramson, as
treasurer

Dear Mr. Brodkey:

On December 19, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Also on December 19, 1990, the Commission found reason to believe that your client violated 2 U.S.C. § 433(c) by failing to timely amend the Statement of Organization to reflect the new identity of the committee's treasurer. However, the Commission further decided to take no further action regarding this violation. Accordingly, the file has been closed in this matter. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

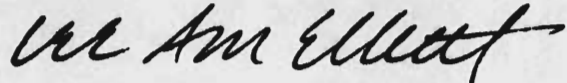
Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any

91040322550

Bruce H. Brodkey, Esq.
Page 2

questions, please contact Tony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
Conciliation Agreement
Factual and Legal Analysis

91040322551

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2987
CeCe Zorinsky for Congress and)
Alvin Abramson, as treasurer)
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that CeCe Zorinsky for Congress and Alvin Abramson, as treasurer ("Respondents"), violated 2 U.S.C. § 441a(f).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. CeCe Zorinsky for Congress is a political committee within the meaning of 2 U.S.C. § 431(4), is an authorized committee within the meaning of 2 U.S.C. § 431(6),

21040322552

and is the principal campaign committee of CeCe Zorinsky.

2. Alvin Abramson is the treasurer of CeCe Zorinsky for Congress.

3. The Committee to Re-Elect Senator Zorinsky is a person within the meaning of 2 U.S.C. § 431(11).

4. Pursuant to 2 U.S.C. § 432(e)(2), a candidate who receives a contribution in connection with his or her campaign for election shall be considered as having received the contribution as an agent of his or her authorized committee.

5. Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

6. Pursuant to 2 U.S.C. § 441a(f), no political committee shall knowingly accept an excessive contribution.

7. Pursuant to 11 C.F.R. § 110.10(a), a candidate for Federal office may make unlimited expenditures from personal funds.

8. Pursuant to 11 C.F.R. § 110.10(b)(1)(i)-(ii), (2), "personal funds" consist of any assets which at the time he or she became a candidate, the candidate had legal right of access to or control over, and with respect to which the candidate had either: legal and rightful title, or an equitable interest. "Personal funds" include salary and other earned income from bona fide employment; dividends and proceeds from the sale of the candidate's stocks or other investments; bequests to the candidate; income from trusts established before candidacy;

91040322553

income from trusts established by bequest after candidacy of which the candidate is the beneficiary; gifts of a personal nature which had been customarily received prior to candidacy; proceeds from lotteries and similar legal games of chance.

9. CeCe Zorinsky filed her Statement of Candidacy on January 19, 1988.

10. In June and July of 1988, the Committee to Re-Elect Senator Zorinsky made contributions to Respondents totalling \$12,500, with respect to the 1988 Nebraska primary election.

11. On May 31, 1989, Respondents reimbursed \$11,500 to the Committee to Re-Elect Senator Zorinsky. On June 1, 1989, the Committee to Re-Elect Senator Zorinsky disbursed \$11,500 to CeCe Zorinsky. Also on this latter date, CeCe Zorinsky forwarded this \$11,500 to Respondents.

12. On June 1, 1989, the Committee to Re-Elect Senator Zorinsky disbursed \$11,109.79 to CeCe Zorinsky. On this same date, CeCe Zorinsky forwarded this \$11,109.79 to Respondents.

13. On June 1, 1989, the Committee to Re-Elect Senator Zorinsky contributed \$1,000 directly to Respondents. On September 5, 1989, Respondents reimbursed this \$1,000 contribution to the Committee to Re-Elect Senator Zorinsky. On September 6, 1989, the Committee to Re-Elect Senator Zorinsky disbursed \$1,000 to CeCe Zorinsky. On this same date, CeCe Zorinsky forwarded this \$1,000 to Respondents.

14. Because the disbursements by the Committee to Re-Elect Senator Zorinsky to CeCe Zorinsky were not received by

91040322554

CeCe Zorinsky prior to the date that she declared her candidacy, such funds did not constitute "personal funds" of CeCe Zorinsky, and thus could not be contributions made by CeCe Zorinsky to her principal campaign committee.

15. Because CeCe Zorinsky forwarded funds which she received from the Committee to Re-Elect Senator Zorinsky after she declared her candidacy to Respondents, such funds constitute contributions to Respondents by the Committee to Re-Elect Senator Zorinsky.

16. Respondents accepted contributions from the Committee to Re-Elect Senator Zorinsky totalling \$24,609.79.

V. Respondents accepted an excessive contribution from the Committee to Re-Elect Senator Zorinsky in the amount of \$23,609.79, in violation of 2 U.S.C. § 441a(f).

VI. Respondents contend that they did not knowingly and willfully violate 2 U.S.C. § 441a(f).

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Hundred dollars (\$500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date

9104032255

that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

December 26, 1990
Date

FOR THE RESPONDENTS:

CeCe Zorinsky for Congress
Alvin Abramson, Treasurer

BY:

Bruce H. Brodkey
Bruce H. Brodkey, Esq.
BRODKEY & PAVEL, P.C.
Suite 200, Lake Regency Bldg.
444 Regency Parkway Drive
Omaha, NE 68114-3755
(402) 397-2000

1/12/90
Date

21040322556

CeCe Zorinsky for Congress

BY: Alvin Abramson
Its Treasurer
Alvin Abramson

11-26-90
Date

Alvin Abramson
Alvin Abramson

11-26-90
Date

91040322557



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 26, 1990

Bruce H. Brodkey, Esq.
Brodkey & Pavel, P.C.
Suite 200, Lake Regency Building
444 Regency Parkway Drive
Omaha, NE 68114-3755

RE: MUR 2987
Committee to Re-Elect Senator
Zorinsky and Michael N. Abramson,
as treasurer

Dear Mr. Brodkey:

On December 19, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Tony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

21040322558

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2987
Committee to Re-Elect Senator Zorinsky)
and Michael N. Abramson, as treasurer)
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Committee to Re-Elect Senator Zorinsky and Michael N. Abramson, as treasurer ("Respondents"), violated 2 U.S.C. § 441a(a)(1)(A).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Committee to Re-Elect Senator Zorinsky is a political committee within the meaning of 2 U.S.C. § 431(4).

91040322559

2. Michael N. Abramson is the treasurer of the Committee to Re-Elect Senator Zorinsky.

3. CeCe Zorinsky for Congress is a political committee within the meaning of 2 U.S.C. § 431(4), is an authorized committee within the meaning of 2 U.S.C. § 431(6), and is the principal campaign committee of CeCe Zorinsky.

4. Pursuant to 2 U.S.C. § 431(11), a political committee is a person.

5. Pursuant to 2 U.S.C. § 432(e)(2), a candidate who receives a contribution in connection with his or her campaign for election shall be considered as having received the contribution as an agent of his or her authorized committee.

6. Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

7. Pursuant to 11 C.F.R. § 110.10(a), a candidate for Federal office may make unlimited expenditures from personal funds.

8. Pursuant to 11 C.F.R. § 110.10(b)(1)(i)-(ii), (2), "personal funds" consist of any assets which at the time he or she became a candidate, the candidate had legal right of access to or control over, and with respect to which the candidate had either: legal and rightful title, or an equitable interest. "Personal funds" include salary and other earned income from bona fide employment; dividends and proceeds from the sale of the candidate's stocks or other investments; bequests to the

91040322560

candidate; income from trusts established before candidacy; income from trusts established by bequest after candidacy of which the candidate is the beneficiary; gifts of a personal nature which had been customarily received prior to candidacy; proceeds from lotteries and similar legal games of chance.

9. CeCe Zorinsky filed her Statement of Candidacy on January 19, 1988.

10. In June and July of 1988, Respondents made contributions to CeCe Zorinsky for Congress totalling \$12,500, with respect to the 1988 Nebraska primary election.

11. On May 31, 1989, CeCe Zorinsky for Congress reimbursed \$11,500 to Respondents. On June 1, 1989, Respondents disbursed \$11,500 to CeCe Zorinsky. Also on this latter date, CeCe Zorinsky forwarded this \$11,500 to CeCe Zorinsky for Congress.

12. On June 1, 1989, Respondents disbursed \$11,109.79 to CeCe Zorinsky. On this same date, CeCe Zorinsky forwarded this \$11,109.79 to CeCe Zorinsky for Congress.

13. On June 1, 1989, Respondents contributed \$1,000 directly to CeCe Zorinsky for Congress. On September 5, 1989, CeCe Zorinsky for Congress reimbursed this \$1,000 contribution to Respondents. On September 6, 1989, Respondents disbursed \$1,000 to CeCe Zorinsky. On this same date, CeCe Zorinsky forwarded this \$1,000 to CeCe Zorinsky for Congress.

14. Because the disbursements by Respondents to CeCe Zorinsky were not received by CeCe Zorinsky prior to the date that she declared her candidacy, such funds did not constitute

91040322561

"personal funds" of CeCe Zorinsky, and thus could not be contributed by CeCe Zorinsky to her principal campaign committee.

15. Because Respondents disbursed funds to CeCe Zorinsky after she declared her candidacy, and such funds were transferred by CeCe Zorinsky to CeCe Zorinsky for Congress, such funds constitute contributions by Respondents to CeCe Zorinsky for Congress.

16. Respondents made contributions to CeCe Zorinsky for Congress totalling \$24,609.79.

V. Respondents made an excessive contribution to CeCe Zorinsky for Congress in the amount of \$23,609.79, in violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondents contend that they did not knowingly and willfully violate 2 U.S.C. § 441a(a)(1)(A).

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand, Five Hundred dollars (\$1,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission

91040322562

has approved the entire agreement.

X. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

Lois G. Lerner (for)
Lois G. Lerner
Associate General Counsel

Date

December 26, 1990

FOR THE RESPONDENTS:
Committee to Re-Elect
Senator Zorinsky
Michael N. Abramson, Treasurer

BY:

Bruce H. Brodkey
Bruce H. Brodkey, Esq.
BRODKEY & PAVED, P.C.
Suite 200, Lake Regency Bldg.
444 Regency Parkway Drive
Omaha, NE 68114-3755
(402) 397-2000

Date

1/16/91

21040322563

Committee to Re-Elect
Senator Zorinsky

BY: Michael N. Abramson
Its Treasurer
Michael N. Abramson

11-26-90
Date

Michael N. Abramson
Michael N. Abramson

11-26-90
Date

21040322564



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2987

DATE FILMED 2/7/91 CAMERA NO. 4

CAMERAMAN AS

91040322565



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO
THE PUBLIC RECORD IN CLOSED MUR 2987.

21040325473

BRUCE H. BRODKEY, P.C.

ATTORNEYS AT LAW
SUITE 300, LAKE REGENCY BUILDING
444 REGENCY PARKWAY DRIVE
OMAHA, NEBRASKA 68114-3755

BRUCE H. BRODKEY
MARK A. SMITH

06C 9921
CLOSED
TELEPHONE
TELECOPIER

January 23, 1991

VIA FEDERAL EXPRESS

Mr. Tony Buckley
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2987
Committee to Re-Elect Senator Zorinsky and
Michael N. Abramson
CeCe Zorinsky for Congress and
Alvin Abramson

Dear Mr. Buckley:

I represent the Committee to Re-Elect Senator Edward Zorinsky and the CeCe Zorinsky for Congress Committees who have each recently executed Conciliation Agreements with the Federal Election Commission.

I am enclosing with this letter the following:

1. Committee to Re-Elect Senator Edward Zorinsky Check No. 1570 dated January 22, 1991, made payable to the Federal Election Commission in the sum of \$1,500.
2. Our office trust account check no. 1005, dated January 23, 1991, made payable to the Federal Election Commission in the sum of \$500.
3. Several documents which we would like to have filed with respect to this case in the Federal Election Commission file which supported our position that neither committee intended to violate any of the Federal Election laws.

I believe that all matters relating to the Conciliation Agreements are completed. Please be certain to advise me if you require any additional action on behalf of the Committees or myself

91 JAN 24 AM 9:06

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 JAN 25 PM 3:22

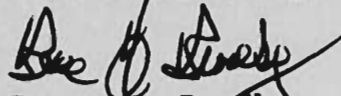
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

21040325474

Mr. Tony Buckley
Federal Election Commission
January 23, 1991
Page - 2 -

to complete this conciliated settlement. I thank you for your kind cooperation.

Yours very truly,



Bruce H. Bradley

BHB:dat

cc: Mr. Alvin Abramson
Mr. Michael Abramson

21040325475



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 12, 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1987-11

George J. Kubat, Treasurer
Committee to Re-Elect Senator
Zorinsky
600 Woodmen Tower
Omaha, Nebraska 68102

Dear Mr. Kubat:

This responds to your letters of April 20 and May 8, 1987, requesting an advisory opinion on behalf of the Committee to Re-Elect Senator Zorinsky ("the Zorinsky Committee") concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations to the disposition of excess campaign funds.

Your letters state that the Zorinsky Committee was the principal campaign committee of the late Senator Edward Zorinsky for the 1988 Nebraska Senatorial primary election. Approximately \$180,000 in excess campaign funds remains in the Zorinsky Committee's treasury. You enumerate nine alternatives being considered by the Zorinsky Committee for the disposition of those funds. The nine alternatives are as follows:

1. Transfer all excess campaign funds to Senator Zorinsky's widow;
2. Transfer all excess funds to a trust for the benefit of Senator Zorinsky's widow;
3. Use excess campaign funds to create a charitable foundation administered by Senator Zorinsky's widow or other qualified people;
4. Use excess campaign funds to create a state political action committee to support or oppose ballot issues and to support candidates for state and Federal offices;
5. Transfer excess campaign funds to members of Senator Zorinsky's family;

91040325476

6. Transfer excess campaign funds to various charitable organizations;
7. Transfer excess campaign funds to local or national political committees such as the state and national Democratic or Republican committees;
8. Refund contributions made for the 1988 Nebraska Senatorial primary to the original donors; and
9. Use excess campaign funds to defray costs (not covered by the official Senate allocation) incurred by Senator Zorinsky's widow in closing the Senator's Washington, D.C. office and moving back to Nebraska.

The Zorinsky Committee may distribute its excess funds for any of the nine proposed purposes subject to the limitations discussed below.

The Act provides that excess campaign funds may be: used by an individual or candidate to defray ordinary and necessary expenses incurred in connection with his or her duties as a holder of Federal office; donated to qualified charitable organizations; transferred without limit to any national, state or local political party committee; or used for "any other lawful purpose" except that with respect to any individual who was not a Senator or Representative in Congress on January 8, 1980, no such amount may be converted by any person for any personal use. 2 U.S.C. §439a, 11 CFR 113.2.

In the absence of any applicable State or Federal law outside the Commission's jurisdiction, which would preclude these uses, the Zorinsky Committee may: transfer the excess funds to the Senator's wife; transfer the excess funds to a trust for the benefit of Mrs. Zorinsky; create a charitable foundation administered by Senator Zorinsky's widow or other qualified people; and transfer excess funds to the Zorinsky family. All of these proposals (alternatives one, two, three, and five) for the use of the excess campaign funds constitute a permissible use of campaign funds insofar as the Act is concerned, and would not be subject to the contribution limits of the Act or regulations. See Advisory Opinions 1981-15, 1980-41, and 1978-94.

Since Mr. Zorinsky was a member of the U.S. Senate on January 8, 1980, the distribution of excess campaign funds for any "personal use" would not be prohibited by 2 U.S.C. §439a or 11 CFR 113.2. Such personal uses may be subject to State law because the Act and regulations do not make personal uses a "lawful purpose." The Commission does not, however, reach any conclusion with respect to application of State law to any personal use of the excess campaign funds.

21040325477

21040325473

The sixth and seventh alternatives, a transfer of the excess campaign funds to various charitable organizations or to local or national political party committees, are expressly made lawful and are exempt from limits under 2 U.S.C. §439a. See also 11 CFR 113.2(b) and (c). Similarly, the ninth alternative, payment of expenses to close the late Senator's office and move his widow from Washington, D.C. to Nebraska, are specifically permitted under the Act because they constitute ordinary and necessary expenses in connection with the duties of a Federal officeholder. See 11 CFR 113.2(a). Expenses to wind down and close the late Senator's office are incident to the conclusion of officeholder activities conducted on his behalf after his death. The expenses of moving his widow back to Nebraska are an officeholder transition expense incurred in connection with the cessation of the late Senator's status as a Federal officeholder. See Advisory Opinion 1980-138. The eighth alternative--contribution refunds--would also be viewed by the Commission as explicitly made lawful since the reporting provisions of the Act anticipate the making of such refunds in the discretion of the donee committee. See 2 U.S.C. §434(b)(4)(F) and (b)(5)(E).

Alternatives six, seven, eight, and nine would also be exempt from any regulation under state law because they are expressly made lawful by the Act and regulations. The Act supersedes the application of state law as to such uses. 2 U.S.C. §453, 11 CFR 108.7

The fourth alternative, while permissible under the Act, would be subject to the contribution limits if the Zorinsky Committee makes a contribution to any political committee which is defined to include any committee that receives or makes contributions (or that makes expenditures) for the purpose of influencing any Federal election in an aggregate amount exceeding \$1,000 during a calendar year. 2 U.S.C. §431(4)(A), (8)(A), (9)(A). Under those circumstances, the political committee would be limited to receiving \$5,000 per calendar year from the Zorinsky Committee.*/ 2 U.S.C. §441a(a)(1)(C), 11 CFR 110.1(c). If, on the other hand, the donee committee is not a "political committee," as defined by the Act, the contribution limits of the Act would not apply.

*/ The Commission has previously recognized that a principal campaign committee may convert to a multicandidate political committee by amending its Statement of Organization to redesignate it as a nonconnected political committee. Such a conversion has been viewed by the Commission as a permissible use of excess campaign funds under 2 U.S.C. §439a and 11 CFR 113.1(e). See Advisory Opinions 1985-30 and 1983-14.

The Zorinsky Committee is required to report all disbursements of its excess campaign funds. 2 U.S.C. §434(b)(4), (b)(5) and 11 CFR 104.3(b). Payments to Mr. Zorinsky's widow, a trust, a charitable foundation, family members, various charitable organizations, local or national political party committees, to close the Senator's Washington office, and to move his widow back to Nebraska, as well as payments to a state political action committee supporting state and Federal candidates, are reportable as other disbursements. See 2 U.S.C. §434(b)(4)(G) and (b)(6)(A), 11 CFR 104.3(b)(2)(vi) and (b)(4)(vi). Refunds to primary election contributors are reportable as offsets. See 2 U.S.C. §434(b)(4)(F) and (b)(5)(E), 11 CFR 104.3(b)(2)(v) and (b)(4)(v).

The Commission expresses no opinion regarding possible application of Senate rules to the described transactions, nor as to any Federal tax or other ramifications, since those issues are outside the Commission's jurisdiction.

This response constitutes an advisory opinion concerning application of the Act, or regulations prescribed by the Commission, to the specific transaction or activity set forth in your request. See 2 U.S.C. §437f.

Sincerely,



Scott E. Thomas
Chairman for the
Federal Election Commission

Enclosures (AO's 1985-30, 1983-14, 1981-15, 1980-138, 1980-41, 1978-94)

91040325479



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jan 25, 1991

TWO WAY MEMORANDUM

TO: Fabrae Brunson
OGC, Docket

FROM: Philomena Brooks *RB*
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Committee to Re-Elect Senator Lohrsky, check number 1570, dated 1/22/91, and in the amount of \$ 1500.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Fabrae Brunson *FOB*
OGC, Docket

In reference to the above check in the amount of \$ 1500.00, the MUR number is 2987 and in the name of Committee to Re-Elect Sen. Lohrsky. The account into which it should be deposited is indicated below:

- ☐ Budget Clearing Account (OGC), 95F3875.16
☒ Civil Penalties Account, 95-1099.160
☐ Other: _____

Fabrae Brunson
Signature

1/28/91
Date

21040325430

first national bank
omaha
one first national center omaha nebraska 68102

COMMITTEE TO RE-ELECT SENATOR ZORINSKY

27-1/1040

1570

4018 LEAVENWORTH
OMAHA, NEBRASKA 68105

1-22 1991

PAY *one thousand five hundred & 00/100* DOLLARS \$1500⁰⁰

TO THE
ORDER OF

*Federal Election
Commission*

THIS CHECK IS ISSUED IN FULL PAYMENT OF ACCOUNT SHOWN HEREON. PAYEE ACCEPTS IT AS SUCH BY ENDORSEMENT HEREON.

Gloria G. Zorinska

⑆104000016⑆38154245⑈70

21040325481



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jan 25, 1991

TWO WAY MEMORANDUM

TO: Fabrae Brunson
OGC, Docket

FROM: Philomena Brooks *PB*
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Bruce H. Brodkey PC, check number 1005, dated Jan 23, 1991, and in the amount of \$ 500.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Fabrae Brunson *FDB*
OGC, Docket

In reference to the above check in the amount of \$ 500.00, the MUR number is 2977 and in the name of Cele Zairsky for Congress. The account into which it should be deposited is indicated below:

- ☐ Budget Clearing Account (OGC), 95F3875.16
- ☒ Civil Penalties Account, 95-1099.160
- ☐ Other: _____

Fabrae Brunson
Signature

1/28/91
Date

21040325432

066 0920

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

91 JAN 25 PM 3:22

BRUCE H. BRODKEY, P.C.

TRUST ACCOUNT
444 REGENCY PKY. DR., STE. 200 PH. 397-2000
OMAHA, NE 68114

1005

01-23 1991

27-5/1040

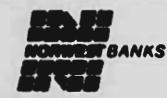
PAY
TO THE
ORDER OF

Federal Election Commission -

\$ 500⁰⁰

Five hundred and ⁰⁰/₁₀₀

DOLLARS



Norwest Bank Nebraska, N.A.
Omaha, NE 68103

FOR

Alana A. Tyler

⑆104000058⑆ 1155252397⑈ 1005

21040325483