

# Nebraska Democrats

985 So. 27th Street ★ Lincoln, Nebraska 68510  
(402) 434-2180 ★ 800-742-0025 ★ FAX (402) 434-2188  
Web Address: <http://www.nebr-democrats.org>  
e-mail: [nebrdems@inetnebr.com](mailto:nebrdems@inetnebr.com)

Oct. 7, 1998

Office of General Counsel  
999 E St. NW  
Federal Election Commission  
Washington D.C. 20463

Dear Office of General Counsel:

The Nebraska Democratic Party wishes to submit a formal complaint with the Federal Election Commission. We are alleging possible violations of federal election campaign laws by Nebraska Attorney General Don Stenberg during his bid for the U.S. Senate in 1995. We are requesting an FEC investigation to determine whether Attorney General Stenberg or his contributors violated any federal laws.

This complaint raises questions about the nature of Attorney General Stenberg's ties to Thousand Adventures, Inc., a Nebraska-based campground company, and the legality of \$9,400 in federal campaign contributions from the company's owner, the owner's relatives and the company's employees to Stenberg's Senate campaign. The complaint seeks an answer to the following question:

- **Did money laundering occur in an attempt to circumvent individual campaign contribution limits, including the laundering of funds through the accounts of a 12-year-old boy and three company employees?**

This complaint is being filed because of concerns that Attorney General Stenberg may have a conflict of interest with Thousand Adventures for not pursuing an obvious case of fraud. Did Thousand Adventures in effect buy off Stenberg and buy its immunity from a lawsuit with campaign contributions?

## **BACKGROUND ON THOUSAND ADVENTURES**

Stenberg's close association with Thousand Adventures, Inc. was exposed by the Omaha World-Herald in a Sept. 7, 1998 investigative report (See Attachment A). The former campground company, based in Blair, Nebraska, filed bankruptcy in 1997. About 70,000 members paid \$6,000 each for access to the company's 58 campgrounds across the country. Those campers are now left with 20 campgrounds under the management of a different company with no assurance that these facilities will continue to stay open.

In all, 21 states filed consumer fraud lawsuits or took some form of legal action against Thousand Adventures to prevent the company from selling memberships. The company failed to maintain or keep campgrounds open, made false and deceptive statements about

the value of memberships and consumers' ability to obtain refunds or sell their memberships; promoted campground facilities that did not exist; engaged in illegal debt collection practices; and changed terms in contracts by imposing additional and unexpected charges to members. (See Attachments B and C).

While several states sought to protect their citizens by filing lawsuits against Thousand Adventures, Nebraska Attorney General Don Stenberg opted against the fraud suit in the company's home state despite more than 300 consumer complaints filed with his office. As Doug Napier, the attorney for a class-action suit on behalf of Thousand Adventures' 70,000 members pointed out in the World-Herald, "If the Nebraska Attorney General's Office had investigated and closed down the Nebraska home office, it would have had the ripple effect of providing protection to people throughout the United States." (See Attachment A).

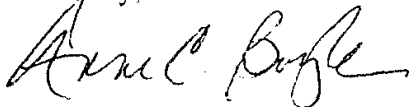
### **FEDERAL CAMPAIGN CONTRIBUTIONS TO DON STENBERG**

David Vopnford, the owner and CEO of Thousand Adventures, six of Vopnford's family members and three employees donated a total of \$9,400 to Stenberg's U.S. Senate campaign in 1995. Five contributions of \$1,000 each and one \$500 contribution were made on June 28, 1995 in the names of three employees, Vopnford's 12-year-old son, Leif Vopnford and two other family members. (See Attachment D). We believe these contributions are suspect for the following reasons:

- Federal law allows minors to make contributions as long as they understand what they are doing and as long as the money was not given to them for that purpose. Was the money given to 12-year-old Leif Vopnford for that purpose and did he fully understand the nature of his action?
- Did the three employees voluntarily make campaign contributions with their own personal funds or was the money laundered through their separate checking accounts to get around the federal contribution limits of \$1,000 per individual?
- The timing of the contributions is intriguing. In addition to the three employees, three family members, including the 12-year-old boy, made their contributions on the same date, June 28, 1995. Was this sheer coincidence or were these contributions arranged by David Vopnford and Thousand Adventures?

Thank you very much for giving this matter your serious attention. We will be looking forward to your response, and in the meantime, if you have any questions, please feel free to contact me or the Nebraska Democratic Party office at 402-434-2180.

Sincerely,



Anne Boyle, State Chair  
Nebraska Democratic Party

Signed in my presence by Anne Boyle on the 7<sup>th</sup>  
day of October, 1998.

