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*ADMITTED IN WASHINGTON
**ADMITTED IN WASHINGTON AND ALASKA
ALL OTHERS ADMITTED IN ALASKA

August 21, 1990

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

Dear Counsel:

AOR 1990 - 20

I am writing you in my dual capacity as a partner in Bradbury, Bliss & Riordan and as Treasurer of Bradbury, Bliss & Riordan Political Action Committee. Bradbury, Bliss & Riordan is a law firm organized as a partnership under the laws of Alaska. As a small portion of our case load, we represent the Federal Deposit Insurance Corporation and the Resolution Trust Corporation in foreclosures, bankruptcies and other financial actions.

Because our Political Action Committee may at some point in the future choose to make a contribution to a federal candidate, we have refrained from making contributions to our Political Action Committee from our general partnership funds to ensure that we are in compliance with 11 C.F.R. § 115.4(a). Up to this point, the partners in our firm have contributed to the Political Action Committee from their personal funds under the authority of 11 C.F.R. § 115.4(b). However, our partnership would like to make contributions to the Political Action Committee from our general fund if it is considered legal and acceptable.

Therefore, we are requesting an advisory opinion from your office as to whether a general partnership law firm which represents the Federal Deposit Insurance Corporation and the Resolution Trust Corporation are considered to be federal contractors within the meaning of 11 C.F.R. § 115. If your office determines that such a partnership is in fact a federal contractor, we will continue to contribute from our personal funds. If your office concludes that we are not a federal contractor, we will make contributions from our general partnership fund.

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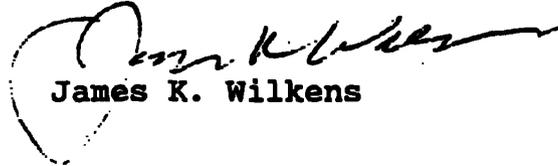
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FEDERAL ELECTION COMMISSION
OF FEDERAL GOVERNMENT COUNSEL

Office of General Counsel
August 21, 1990
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Thank you for your assistance in this matter.

Regards,

BRADBURY, BLISS & RIORDAN



James K. Wilkens

JKW/cl
SRO\FEC