

CoreStates Financial Corp  
FC 1-8-15-1  
PO Box 7618  
Philadelphia PA 19101-7618  
215 973 3810  
Fax 215 973 8576  
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Legal Department

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**CoreStates**

July 23, 1997

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

Dear Mr. Chairman:

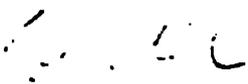
I am counsel to CoreStates Financial Corp and in that capacity am requesting an Advisory Opinion on behalf of Philadelphia 2000, a host committee under the Federal Election Campaign Act of 1971. Philadelphia 2000 has requested a contribution from CoreStates to defray some of the Committee's costs for conducting a political convention for the 2000 general election. Accordingly, I respectfully request your Advisory Opinion with respect to the permissibility of acceptance by the Committee of a cash contribution in the amount of \$25,000 from either of the following prospective donors: 1) CoreStates Financial Corp, which is a holding company of two national banks and other non-banking organizations, or 2) CoreStates Foundation, a separate and distinct legal entity established for charitable purposes. Both of these entities are located within the metropolitan area of the potential convention city, Philadelphia, PA.

Although the holding company derives revenues from its Federally chartered bank subsidiaries, it also derives revenues from other sources far in excess of the \$25,000 it would donate. The Foundation is funded by the holding company.

None of the contributed funds would be used in connection with a Federal election, but rather to promote and lobby for the City of Philadelphia as the convention site and help finance convention-related facilities and services.

Thank you very much for providing an Advisory Opinion on this matter.

Sincerely,

  
Rena Johnson  
Counsel  
(215) 973-5684

I:sec.ltr

cc: Noreen Casey  
Christopher J. Carey



**FEDERAL ELECTION COMMISSION**

**Washington, DC 20463**

**August 5, 1997**

**Rena Johnson, Counsel  
CoreStates Financial Corp.  
PO Box 7618  
Philadelphia PA 19101-7618**

**Dear Ms. Johnson:**

**This refers to your letter received July 28, 1997, which requests advice concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), to proposed donations made to Philadelphia 2000 ("the Philadelphia Committee"), a host committee under the Federal Election Campaign Act of 1971.**

**You state that you are counsel to CoreStates Financial Corp. and "in that capacity" you are requesting an advisory opinion on behalf of the Philadelphia Committee which has requested a contribution from CoreStates to defray some of the committee's costs for holding a political convention for the 2000 general election. The situation you present is the acceptance by the Philadelphia Committee of a cash donation in the amount of \$25,000 from either of the following prospective donors: 1) CoreStates Financial Corp., which is a holding company of two national banks and other non-banking organizations, or 2) CoreStates Foundation, a separate and distinct legal entity established for charitable purposes. You state that both of these entities are located within the metropolitan area of the potential convention city, Philadelphia, PA.**

**As you may know, the Federal Election Campaign Act of 1971, as amended ("the Act"), authorizes the Commission to issue an advisory opinion in response to a "complete written request" from any person with respect to a specific transaction or activity by the requesting person. 2 U.S.C. §437f(a). The request is made public, and the Commission's opinion also becomes a public document. 11 CFR 112.2(a), 112.4(g). The request must present a legal issue within the jurisdiction of the Federal Election Commission. It must also set forth a specific transaction or activity that "the requesting person plans to undertake or is presently undertaking and intends to undertake in the future." 11 CFR 112.1(b). The regulations further explain that an advisory opinion request "shall include a complete description of all facts relevant to the specific transaction or activity with respect**

to which the request is made." 11 CFR 112.1(c). In addition, the regulations provide that this office shall determine if a request is incomplete or otherwise not qualified as an advisory opinion request. 11 CFR 112.1(d).

In view of the foregoing requirements for the Commission to consider your letter as an advisory opinion request, further information is necessary. Therefore, please provide the following information:

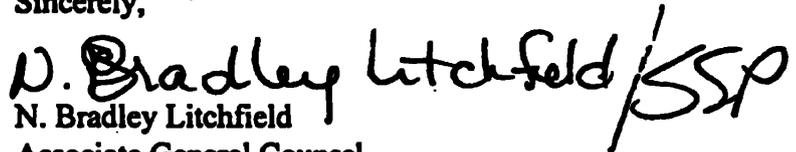
1. As a preliminary matter, this office notes that you identify yourself as counsel to CoreStates Financial Corp. You indicate, however, that you are requesting this opinion on behalf of the Philadelphia Committee. Your request can only be considered if you are acting as counsel for a client and dealing with specific proposed activity by that client rather than the actions of a third party. Therefore, please clarify whether you are authorized to act as counsel for the Philadelphia Committee, or whether you are making this request on behalf of CoreStates Financial Corp., or whether you are representing both parties in this request as authorized counsel for both.

2. State whether CoreStates Foundation is incorporated and clarify the status of the Foundation under the Internal Revenue Code. For example, state whether it is a Section 501(c)(3) organization under the Internal Revenue Code.

For your information and guidance, enclosed are copies of Advisory Opinions 1995-32 and 1995-31 which addressed the issue of host committees accepting monetary and in-kind donations from individuals, companies (including holding companies) or other entities related to Federally chartered banks. The Act provides that any person can rely on an opinion issued to another if the facts and circumstances of the relying person are "indistinguishable in all . . . material aspects" from the activity presented in the past opinion. 2 U.S.C. §437f(c). Therefore an advisory opinion may not be necessary in your circumstances. However, if after reviewing the enclosed materials you still wish to request an opinion please provide responses to the questions outlined above.

If you have any questions about this letter, the advisory opinion process or the enclosed materials, please contact Michael Marinelli, the staff attorney who prepared this letter. His number is (202) 219-3400.

Sincerely,

  
N. Bradley Litchfield  
Associate General Counsel

Enclosures  
Advisory Opinions 1995-32 and 1995-31

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COMMISSION  
SECRETARIAL

AUG 19 4 24



CoreStates

August 13, 1997

N. Bradley Litchfield, Associate General Counsel  
Federal Election Commission  
Office of General Counsel  
999 E Street, N.W.  
Washington, DC 20463

AOR 1997-19

Dear Mr. Chairman:

Thank you for your letter of August 5 responding to my request for an advisory opinion for CoreStates Financial Corp.

In response to your inquiries, I am counsel for CoreStates Financial Corp and it is in that capacity that I requested the Advisory Opinion, not on behalf of Philadelphia 2000. Thank you for clarifying that distinction, and please excuse any confusion which may have resulted from the wording of my letter in that regard. With respect to CoreStates Foundation, the Foundation was incorporated in 1985 as a domestic (Pennsylvania) nonprofit corporation and it is a Section 501(c)(3) organization under the Internal Revenue Code.

Thank you for providing relevant Advisory Opinions with your letter. They were most informative and, while we believe that our facts and circumstances are indistinguishable in all material respects from those described therein, we do still wish to have an Advisory Opinion for our files.

Thank you very much for providing an Advisory Opinion on this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Rena Johnson'.

Rena Johnson  
Counsel  
(215) 973-5684

I:fec.ltr

cc: Noreen Casey  
Christopher J. Carey