

**THE TRUSTEES OF THE
REPUBLICAN LEADERSHIP TRUST**
PHILADELPHIA, PENNSYLVANIA 19144

Resolution No. 2008-11

In re

MEMORIALIZING CONFIRMATION WITH THE FEDERAL ELECTION COMMISSION

- Whereas,** The Trustees are required under the Pennsylvania Uniform Trust Act, 20 Pa.C.S. § 7774 to administer the Trust with the upmost prudence; in addition to acting impartially among all beneficiaries, including the Republican National Committee, the National Republican Congressional Committee, and the National Republican Senate Committee, all who are regulated under the Federal Elections Campaign Act of 1972 as amended, 2 U.S.C. § 431 *et seq.* (“FECA”) which governs contributions and expenditures for Federal Election Activity, 2 U.S.C. § 431(20), and see also 11 CFR 100.24; and
- Whereas,** It appearing to the Trustees that FECA, as amended by BCRA, commonly known as McCain-Feingold, at 2 U.S.C. § 441i(d), and see also 11 CFR 300.11 prohibits the aforementioned beneficiaries from undertaking any solicitation on behalf of or direct donations to the Trustees, unless and until the Trustees did register with the Federal Election Commission (the “Commission”) as a political committee as defined under 11 CFR 100.5 as apparently required under 11 CFR 300.11(a)(3)(i), such prohibition also extending to all other beneficiaries which are State and county Republican committees, 11 CFR 300.37(a)(3)(i); and
- Whereas,** Upon registration as a political committee under 11 CFR 100.5, the Commission did inquire of the Trustees to confirm that the Trustees are independent of the Pennsylvania State Republican Committee and its campaign contribution limits per 11 CFR 110.3(b)(3) as further provided under AO 1999-4 (In re Republican Party of Minnesota) and AO 1978-9 (In re Republican State Central Committee of Iowa), notwithstanding the experiences of one of the Trust’s settlors on the identical issue; and
- Whereas,** The Trustees are of the information and belief that in administering the Trust Property they do not in any respect engage in or undertake Federal Election Activity, such being the domain of the beneficiaries;

Now Therefore be it Resolved, that the Trustees shall and by this Resolution DECREE and ORDER the Will of the Trustees be memorialized to confirm as provided within their registration with the Commission that the Trustees are independent of the Pennsylvania State Republican Committee for purposes of FECA and regulations therein promulgated by the Commission relative to campaign contributions and expenditures governed therein by FECA, a copy of this Resolution to be sent to Mr. Andrew Dodson of the Commission at their Washington, D.C. offices.

Passed September 16, 2008.