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Father Frank Pavone
National 'Director
Priests for Life
P.O. Box 236695
Cocoa, Florida 32923

Dear Father Pavone:

I have reviewed the document sent to me from Priests for life entitled, *A Comparison of the 'Republican and 'Democratic Platforms: A Non-Partisan Guide of Issues of Concern to the Electorate*. It is my opinion that such document is in compliance with IRS guidelines regarding the political activities of 501(c) organizations.

IRS guidelines prohibit a 501(c) organization, such as Priests for Life, from endorsing or opposing any candidate for political office. However, such entities may publish non-partisan statements that educate voters on the positions of candidates and/or their political parties on issues of concern. Such statements must be neutral in that they do not show a preference for a candidate or party and must cover a variety of concerns, as opposed to covering one issue.

The statement published by Priests for Life clearly fit within the guidelines issued by the IRS.

Sincerely,



Thomas A. Glessner, J.D.
Attorney at Law