

# Memorandum

To : File - 82015, 82025  
18225, 18423

Date : July 31, 1978

78-07-081

From : FAIR POLITICAL PRACTICES COMMISSION  
Lee Rosenthal

Subject:

Claremont College has an internship program whereby students are paid to work on political campaigns. Under 82015 and 82025 the payment of money by the college to the students would be expenditures or contributions. However, 2 Cal. Adm. Code §18423 excludes from the definition of expenditure and contribution employer payments to employees "pursuant to a uniform policy allowing employees to engage in political activity." 2 Cal. Adm. Code §18423(a)(2). While the college plan does not fit exactly under the regulation, we have advised the college that their activity is exempt from disclosure so long as there is nothing about the program which results in favoring a particular party or candidate.

LCR:plh