

# Memorandum

To : Opinion Request Meeting Participants

Date : 2-15-78

78-02-114

From : FAIR POLITICAL PRACTICES COMMISSION  
Natalie West

Subject: Discussion Item.

## Independent Expenditures by a Lobbyist

Does the prohibition on lobbyist contributions, Section 86200, 86202, include expenditures? If not, may a lobbyist make an expenditure supporting a state candidate, committee supporting a state candidate, or an elected state officer?

NEW:jo

We decided to avoid giving any advice on this point until IGA decision is rendered. Staff is split - some think independent expenditures can be prohibited; others think they can't. At p.41 of our IGA brief we implied that lobbyists can make independent expenditures.