

*Company can speak to employees about contributing to pac 86202*

**Memorandum**

To : Opinion Request Meeting  
Participants

Date : July 20, 1978

From : FAIR POLITICAL PRACTICES COMMISSION  
Barbara Campbell

*Handwritten scribble*  
*M-78-348*

Subject: Government Code Section 86202

J. C. Penney Co.'s registered lobbyist has been asked to speak at a meeting of J. C. Penney's employees to encourage the attendees to contribute to J. C. Penney's federal pac.

J. C. Penney Co. will match the California employees' federal pac contributions by contributing that amount to J. C. Penney's state pac.

Can the lobbyist speak at the meeting or is the lobbyist arranging for a contribution in violation of Government Code Section 86202?

BC:plh

At the July 24, 1978, Opinion Request meeting, the staff decided the lobbyist could speak to the employees without violating Government Code Section 86202 under the IGA v. Younger decision, as long as the speaking is the extent of the lobbyist's involvement.