



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**ADVISORY OPINION 2015-14
(Hillary for America)**

**CONCURRING STATEMENT OF
COMMISSIONER ELLEN L. WEINTRAUB**

The Federal Election Commission today gave a real boost to the ability of college students of limited means to fully participate in the political life of our country.

Last summer, Victoria Houghtalen sought to have DePauw University, where she is a student, defray some of her travel and living expenses as she interned for a presidential campaign. Ms. Houghtalen was awarded \$3,000 by DePauw's Hubbard Center Summer Internship Grant Program, but was unable to accept the funds. Until today, all such educational stipends to college students were swept into the Commission's ban on corporations (even 501(c)(3) non-profit corporations) making in-kind contributions to political committees.

But DePauw University's internship and stipend programs are distinguishable from those the Commission has examined before. The Hubbard Grants are a longstanding program at DePauw University, which is an accredited institution of higher learning and a 501(c)(3) non-profit organization. DePauw University funds the Hubbard Grants itself. Only existing students are eligible to receive stipends, and they must return to campus the following fall. All DePauw students must complete two "Extended Studies" programs, so Ms. Houghtalen's internship fulfilled a graduation requirement. The Hubbard Grants are administered in a non-partisan manner and without advancing political goals. They put politically minded college students on an even footing with their classmates who engage in other types of service.

Given all these facts, the Commission determined that the stipends DePauw University pays to its students to compensate them for their travel and living expenses are not compensation "for" the services the students provide to political committees, and are thus not prohibited corporate contributions. The stipends simply support the academic needs of the students of DePauw University. Needless to say, this opinion about an apolitical university internship stipend provides no cover to super PACs, (c)(4)s, or billionaires with political agendas seeking to subsidize the staff of their favorite candidates.

Based on this advisory opinion, any college student who applies for a stipend in a program materially indistinguishable from DePauw University's program can get help paying for

their ramen noodles as they spend a summer gaining firsthand political experience. This decision is not only good for our hungry collegiate political nerds, it is good for our democracy. It opens up one of our core democratic processes to a wider group of citizens and opens up a new avenue for civic engagement.

I am delighted that the Commission was able to iron out our differences and issue clear guidance here.

A handwritten signature in blue ink that reads "Ellen L. Weintraub" with a stylized flourish at the end.

February 11, 2016

Ellen L. Weintraub
Commissioner