

October 29, 2015

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**BY HAND DELIVERY**

Office of the General Counsel  
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Acting General Counsel  
Federal Election Commission  
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Washington, D.C. 20463

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**Re: Advisory Opinion Request**

Dear Mr. Petalas:

Pursuant to 52 U.S.C. § 30108 we seek an advisory opinion on behalf of Hillary for America (“HFA” or the “Campaign”). HFA seeks confirmation that it is permissible under the Federal Election Campaign Act (the “Act”) and Commission regulations for Ms. Victoria Houghtalen, a former unpaid HFA intern and current DePauw University student, to accept school credit as well as a stipend from DePauw University for the time she spent interning on the Campaign, provided that the stipend was offered to Ms. Houghtalen for her own educational benefit and pursuant to a generally administered program that, unlike the internship programs considered by the Commission in the past, did not condition the availability of the stipend upon the political nature of the internship.

A contrary determination by the Commission will have the practical impact of preventing students from less affluent backgrounds from gaining these valuable experiences. It will promote a two-tiered system of access to political internships for college students based entirely upon their economic fortunes. And, as a result, it will disproportionately and negatively impact students of color. Yet, nothing in the text of the Act, the Commission’s rules, or sound public policy compel such an unjust result. Instead, the law can be, and should be, easily read to permit the internship program as described below. We urge the Commissioners to unanimously opine that the proposed conduct is fully consistent with and permissible under the law.

## I. BACKGROUND

### A. Hillary For America Internship Program

The Hillary for America Internship Program (the "HFA Internship Program") provides an opportunity for students across the country to gain a first hand, practical education in the federal electoral process. Under the program, current students are offered an unpaid internship during the spring, summer or fall at the Campaign's headquarters office in Brooklyn, New York. In selecting participants for the HFA Internship Program, the Campaign places significant emphasis on recruiting students from diverse backgrounds in order to facilitate the inclusion of all Americans into the democratic process.

The HFA Internship Program is organized for the purpose of educating and training its student participants, allowing each intern to gain expertise in the various fields that make up a political campaign, such as communications, information technology, vetting, analytics, compliance and financial management. Students may intern for a single department or multiple departments, depending on program capacity and their personal interests.

HFA interns receive daily training from their direct supervisors and additionally attend formal weekly training workshops and speaker series in order to broaden the scope of the educational experience they receive from the internship. Overall, the program seeks to provide students with the tools and education they need to leave the Campaign as engaged and effective participants in the democratic process.

### B. DePauw University Summer Internship Grant Program and Extended Studies Requirement

DePauw University ("DePauw" or the "University") is a liberal arts college that is organized as a 501(c)(3) organization.<sup>1</sup> The mission of DePauw is to create an atmosphere of intellectual challenge and social engagement that prepares its 2,300 students for lifelong success.<sup>2</sup> As part of this mission, the University prioritizes the importance of in-depth, practical learning experiences for its students. This priority takes shape both in the University's administration of the Hubbard Center Summer Internship Grant Program and in the imposition of an Extended Studies Credit requirement on all students.

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<sup>1</sup> See DePauw University, "About DePauw," <http://www.depauw.edu/about/> (last accessed Oct. 29, 2015); EIN #: 35-0869045.

<sup>2</sup> See DePauw University, "About DePauw," <http://www.depauw.edu/about/> (last accessed Oct. 29, 2015).

i. *Hubbard Center Summer Internship Grant Program*

The "Hubbard Center Summer Internship Grant Program" is a University wide program that provides basic financial support to students who accept unpaid internships in a non-profit, government or start up environment that might otherwise be cost-prohibitive for the student.<sup>3</sup> Under the program, all University students are eligible to apply for a summer stipend of up to a maximum amount of \$3,000 to offset the basic living expenses that will be incurred during the period spent interning.

In order to apply for the stipend, all students are required to submit a basic written application to the Hubbard Center for Student Engagement, the department within the University that runs the Summer Internship Grant Program. There are no qualifications on the subject area of the unpaid internship so long as the student can demonstrate in their application that the internship "relate[s] and connect[s] to [the student's] academic, personal, and professional goals."<sup>4</sup> Along with their application, all students must also provide a detailed budget for their internship experience that estimates the basic expenses the student will incur in travel to the internship location, rent, utilities, public transportation and meals.<sup>5</sup> Based upon this budget, each stipend is calculated solely to provide students with financial support for the basic travel and subsistence expenses incurred during the internship experience, not to compensate them for services provided to the organization for whom they intern.

The Hubbard Center then reviews each application that is submitted to assess the educational benefit of the internship, namely to determine whether the proposed internship will provide an in-depth experience that is focused on the individual student's learning objectives and interests. This evaluation process is conducted using a formal scoring rubric (the "Scoring Rubric") that is universally applied to all applications.<sup>6</sup> The decision to provide a stipend is based upon the net score awarded to the application using the Scoring Rubric.

In 2015, the Hubbard Center Summer Internship Grant Program received 142 applications. After undertaking the evaluation process described above, the Program provided summer internship stipends to 78 students.

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<sup>3</sup> See DePauw University, "Summer Internship Grant Program," <http://www.depauw.edu/academics/centers/hubbard/distinctly-depauw/summer-internship-grant-program/> (last accessed Oct. 29, 2015).

<sup>4</sup> A copy of the Hubbard Center Summer Internship Grant Program application form is available in Appendix A.

<sup>5</sup> See Appendix A.

<sup>6</sup> A copy of the Hubbard Center Summer Internship Grant Program Scoring Rubric is available in Appendix B.

ii. *Extended Studies Credit Requirement*

Separate from the Hubbard Center Summer Internship Grant Program, DePauw requires all students to receive credit for two "Extended Studies" experiences in order to graduate;<sup>7</sup> The purpose of the Extended Studies Credit requirement is to provide a mechanism for each student to "intensively focus on a particular topic, problem or skill-set, which enhances their liberal arts education."<sup>8</sup> One way for students to receive credit for an Extended Studies experience is through a summer internship.

C. Victoria Houghtalen

Victoria Houghtalen is a current DePauw student that applied for a summer internship pursuant to the HFA Internship Program described above. The Campaign offered Ms. Houghtalen an eight week long unpaid internship in the compliance, Federal Election Commission and vetting department, as well as other substantive departments within the Campaign pursuant to her interests (the "HFA Internship").

Upon receiving the offer, Ms. Houghtalen applied to DePauw to receive Extended Studies Credit for the internship. In order to receive approval for the credit, Ms. Houghtalen was required to submit a contract that included a list of the personal development goals she aimed to achieve through the experience.<sup>9</sup> Ms. Houghtalen set forth these goals in consultation with both DePauw and her supervisor at HFA and submitted the final contract to DePauw for approval. The University found the internship to meet the Extended Studies requirements and agreed to provide school credit for the HFA Internship.

Ms. Houghtalen additionally applied to the Hubbard Center Summer Internship Grant Program for a stipend to help offset the basic travel and subsistence expenses she would incur during the unpaid internship. As part of her application to the Hubbard Center, Ms. Houghtalen submitted an anticipated budget that estimated the cost of her basic and necessary expenses during the eight week period -- the cost of her roundtrip flight from Indiana to New York, grocery and meal expenses, public transportation costs and rent.<sup>10</sup> The net budget for the eight week period came to \$4,735.<sup>11</sup> The Hubbard Center offered Ms. Houghtalen a \$3,000 stipend to offset these anticipated expenses (the "Hubbard Center Stipend" or the "Stipend").

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<sup>7</sup> See DePauw University, "Extended Studies: Winter Term, May Term, Summer & Semester," <http://www.depauw.edu/academics/centers/hubbard/extended-studies/> (last accessed Oct. 29, 2015).

<sup>8</sup> See *id.*

<sup>9</sup> A copy of the contract that Ms. Houghtalen filled out to receive Extended Studies Credit is available in Appendix C.

<sup>10</sup> A copy of the estimated budget submitted by Ms. Houghtalen as part of her application to the Hubbard Center Summer Internship Grant Program is available in Appendix D.

<sup>11</sup> See Appendix D.

Ms. Houghtalen accepted HFA's offer and spent her summer interning at Campaign headquarters in Brooklyn, New York. As part of the HFA internship, Ms. Houghtalen assisted the Campaign with the preparation of its July quarterly FEC Report, while also spending a significant amount of time engaged in a range of other substantive work pursuant to her interests, such as helping with the Campaign's vetting, attending educational events organized by the HFA Internship Program and interacting with Campaign supporters and volunteers.

The Hubbard Center has not yet provided Ms. Houghtalen with any funds whatsoever. HFA seeks this advisory opinion to confirm the permissibility of Ms. Houghtalen accepting the Hubbard Center Stipend as well as the Extended Studies Credit.

HFA specifically requests that the Commission address the following questions:

- (1) Whether DePauw, a 501(c)(3) corporation, may provide Ms. Houghtalen with the Stipend to further its educational mission without a contribution to HFA resulting?
- (2) Whether Ms. Houghtalen may accept the Stipend from DePauw without a contribution to HFA resulting because, as an intern under federal labor law, the HFA Internship Program was for her educational benefit to provide training similar to that which would be given in an educational environment, and did not result in the provision of personal services to HFA?
- (3) Whether DePauw may provide the Hubbard Center Stipend to Ms. Houghtalen as part of a bona fide and generally administered program that meets the standard outlined in 11 C.F.R. § 100.54(c) without a contribution to HFA resulting?
- (4) Whether Ms. Houghtalen may alternatively accept the Hubbard Center Stipend specifically for the time she spent assisting with the legal and accounting work performed by the Campaign in order to ensure compliance with the Act without a contribution to HFA resulting?
- (5) Whether Ms. Houghtalen may accept Extended Studies Credit for the HFA Internship without a contribution to HFA resulting as school credit is not considered a form of compensation under the Act?

## II. LEGAL ANALYSIS

### A. DePauw, a 501(c)(3) corporation, may provide Ms. Houghtalen with the Stipend to further its educational mission without a contribution to HFA resulting.

In keeping with the purpose of the Act and the barriers placed upon its scope by both prudence and the fundamental protections of the First Amendment to the Constitution, the Commission has recognized that certain educationally motivated activities, even when they may result in an incidental benefit to a federal candidate, do not result in a contribution under the Act.

Such a recognition has been, and continues to be, vital in preserving the ability of non-partisan organizations to run educational programs that support diverse and full participation in our democratic system.

For example, in Advisory Opinion 2000-16, the Commission unanimously approved a proposal by Third Millennium, a 501(c)(3) corporation, to pay for the production and placement of 15 to 20 internet advertisements in support of various Presidential candidates. Under the proposal, the advertisements would be viewed by approximately 36,000 individuals as part of a project designed by Third Millennium to study political disengagement among young Americans.<sup>12</sup> Third Millennium's request to the Commission stressed that the company was non-partisan in both its structure and its activities and further that, as a 501(c)(3) corporation, it was prohibited from participating or intervening in any political campaign on behalf of or in opposition to any candidate for public office.<sup>13</sup> As explained to the Commission, the company's motivation for producing and placing the advertisements was educational, not political -- to generate survey data that would aid in the evaluation of the company's hypothesis regarding why young Americans vote in such low numbers.<sup>14</sup> The Commission, accordingly, found that the proposal was permissible under the Act.<sup>15</sup>

In this instance, the University, like Third Millennium, is a 501(c)(3) corporation that is prohibited by the Internal Revenue Code, as a condition of its tax-exempt status, from participating or intervening in any political campaign on behalf of or in opposition to any candidate for public office.<sup>16</sup> As a necessary condition of this restriction, the University is also non-partisan both in its structure and in its administration of the Hubbard Center Summer Internship Grant Program. Accordingly, DePauw offered Ms. Houghtalen the Hubbard Center Stipend for the sole purpose of assisting her with an educational experience, not to influence or pay her to work for a political campaign.

Therefore, the Stipend falls outside of the scope of a prohibited corporate contribution under the Act and Commission regulations, which is defined to only include: (i) the payment of compensation for the personal services of another person that are rendered without charge to a political committee;<sup>17</sup> (ii) the provision of "any direct or indirect payment . . . or anything of value . . . to any candidate . . . in connection with any election [to federal office]"; and (iii) any

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<sup>12</sup> FEC Adv. Op. 2000-16 (Third Millennium).

<sup>13</sup> See Request for an Advisory Opinion by Third Millennium (June 8, 2000).

<sup>14</sup> See *id.*; FEC Adv. Op. 2000-16 (Third Millennium).

<sup>15</sup> FEC Adv. Op. 2000-16 (Third Millennium).

<sup>16</sup> See 26 U.S.C. § 501(c)(3).

<sup>17</sup> 52 U.S.C. §§ 30118(b)(2); 30101(8)(A)(ii); see also 11 C.F.R. § 100.54.

**“gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.”<sup>18</sup>**

The opposite reading of the Act, to broadly sweep in the provision of the Stipend, will do nothing but needlessly chill the educational activity of a non-profit university and make it impossible for socio-economically disadvantaged students to gain valuable experiences in politics. There is little doubt that extending the Act in such a manner will disproportionately impact diverse students of ordinary means who wish to take active part in the federal electoral process, but are unable to do so without the assistance of programs like the Hubbard Center Summer Internship Grant Program. It is simply unfathomable that the Act requires that the door to democratic participation be left open only to those select few young Americans of extraordinary means that are able to support themselves during an unpaid internship without assistance.

Requestor is aware that more than 35 years ago in Advisory Opinion 1979-67 the Commission suggested a contrary conclusion in a one sentence, conclusory statement.<sup>19</sup> As discussed below, it is possible to read that opinion narrowly. However, to the extent that the Commission concludes that Advisory Opinion 1979-67 is at odds with the current request, that Opinion should be explicitly overruled as inconsistent with the Act. It stands as an unnecessary remnant of a regulatory approach that was unconcerned with the consequences to lower income students of interpreting the law in such a rigid manner.

**B. Ms. Houghtalen may accept the Hubbard Center Stipend without a contribution to HFA resulting as the Hubbard Center Stipend is not payment for Ms. Houghtalen’s personal services.**

Under the Act and Commission regulations, a corporation is prohibited from making a contribution to a federal candidate committee.<sup>20</sup> A “contribution” for the purposes of this restriction is defined to include “the payment by any person of compensation for the personal services of another person which are rendered to a political committee without charge for any purpose.”<sup>21</sup>

Because of the structural design of the HFA Internship Program, the requirements imposed by federal labor law and the conditions of the Hubbard Center Stipend, Ms. Houghtalen’s internship was focused on her own educational benefit, and therefore did not result in the provision of personal services to the Campaign.

<sup>18</sup> 52 U.S.C. §§ 30118(b)(2); 30101(8)(A)(i) (emphasis added).

<sup>19</sup> FEC Adv. Op. 1979-67 (RNC/DNC).

<sup>20</sup> 52 U.S.C. § 30118(a).

<sup>21</sup> 52 U.S.C. §§ 30118(b)(2); 30101(8)(A)(ii); see also 11 C.F.R. § 100.54.

Under the Fair Labor Standards Act (the "FLSA"), all employers must adhere to certain rules, including a minimum wage requirement, with respect to their "employees."<sup>22</sup> An "employee" is defined to include "any individual employed by an employer,"<sup>23</sup> and "employ" is broadly defined as to "suffer or permit to work."<sup>24</sup> Pursuant to guidance from the Department of Labor, a bona fide intern is not considered to be employed under the FLSA because the intern works in his or her own interest and not in the interest of the business that provides aid or instruction.<sup>25</sup>

In determining whether an intern works in his or her own interest and therefore is not considered an employee, the Department of Labor applies a six factor test that requires, in relevant part, that: the internship experience is for the benefit of the intern; the internship is similar to training which would be given in an educational environment; and the employer that provides the training receives no immediate advantage from the activities of the intern, and on occasion may actually have its operations be impeded by the presence of the intern.<sup>26</sup>

In keeping with these requirements imposed by federal labor law, the HFA Internship Program is designed for the benefit of its interns, with a primary focus on providing each intern with a valuable educational experience. The HFA Internship Program places principal responsibility on the direct supervisors of every intern to provide daily training and educational opportunities. Further, all HFA interns are additionally provided with the opportunity to attend weekly speaker series and training workshops, which are designed to provide both a broad based education in the federal electoral process and specific technical training in the substantive areas that fall outside of the intern's assigned placement.

With regards to Ms. Houghtalen in particular, the educational focus of her HFA Internship was verified by two separate and independent determinations by DePauw. First, in order to qualify for the Hubbard Center Stipend Ms. Houghtalen had to prove to DePauw that the HFA internship would provide her with an educational experience that connects to her academic and professional goals. Separately, in order to meet the requirements to receive Extended Studies Credit, Ms. Houghtalen was required to submit a contract demonstrating the professional goals that she would achieve through her HFA Internship experience.

Accordingly, because the HFA Internship was specifically designed and intended to further Ms. Houghtalen's education, it did not result in the provision of personal services to the

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<sup>22</sup> See generally 29 U.S.C. § 201 et seq.

<sup>23</sup> *Id.* § 203(e)(1).

<sup>24</sup> *Id.* § 203(g).

<sup>25</sup> U.S. Dept. of Labor, Wage and Hour Division, *Fact Sheet #71: Internship Programs Under The Fair Labor Standards Act*, available at <http://www.dol.gov/whd/reg/compliance/wlhd/fs71.htm>. Note that while the guidance provided by the Department of Labor is focused on interns working in the for-profit sector, there is no reason to believe that a different approach would inure in the non-profit sector.

<sup>26</sup> See *id.*

Campaign and the acceptance of the Hubbard Center Stipend by Ms. Houghtalen will not result in a prohibited contribution from DePauw to HFA.

**C. DePauw may provide the Hubbard Center Stipend to Ms. Houghtalen as part of a bona fide and generally administered program that meets the standard outlined in 11 C.F.R. § 100.54(c) without a contribution to HFA resulting.**

Consistent with the Act and Commission regulations, an employer may provide an employee with a salary or benefits during bona fide leave time the employee takes off to spend engaging in political activity, so long as it does so pursuant to a generally administered leave program. The logic of that regulation should apply with equal or greater force to a university providing its student with a stipend for an internship as part of a bona fide and generally administered grant program that is not conducted for the purpose of influencing a federal election.

As noted above, under the Act and Commission regulations, a "contribution" for purposes of the ban on corporate contributions is defined to include the payment of compensation for the personal services of another person that are rendered without charge to a political committee.<sup>27</sup> A prohibited corporate contribution further includes: (i) the provision of "any direct or indirect payment . . . or anything of value . . . to any candidate . . . in connection with any election [to federal office]"; and (ii) any "gift, subscription, loan, advance, or deposit of money or anything of value made by any person *for the purpose of influencing any election for Federal office.*"<sup>28</sup>

With respect to the provision of personal services, however, Commission regulations provide that no compensation is considered paid by an employer, and no contribution results, where the time used by an employee to engage in political activity is bona fide, although compensable, vacation time or other earned leave.<sup>29</sup> An employer's continued payment of benefits or salary to an employee during bona fide leave is additionally not considered to be provided in connection with a federal election or for the purpose of influencing a federal election and therefore does not result in a prohibited corporate contribution.<sup>30</sup>

Accordingly, the Commission has consistently held that an employer may provide an employee with benefits during bona fide leave time spent engaged in political activity, so long as the benefits are provided pursuant to a pre-existing and generally administered program, rather than as part of a discretionary determination by the employer to provide an employee with special

<sup>27</sup> 52 U.S.C. §§ 30118(b)(2); 30101(8)(A)(ii); *see also* 11 C.F.R. § 100.54.

<sup>28</sup> 52 U.S.C. §§ 30118(b)(2); 30101(8)(A)(i) (emphasis added).

<sup>29</sup> 11 C.F.R. § 100.54(c).

<sup>30</sup> *See* FEC Adv. Ops. 1992-03 (Reynolds Metal) and 1976-70 (National Republican Congressional Committee) (suggesting that the continued provision of a salary or benefits during leave time taken off by an employee is considered to be provided in connection with a federal election or for the purpose of influencing a federal election only where it is not provided pursuant to a bona fide policy or program, but is rather provided pursuant to a one-off, discretionary determination).

treatment.<sup>31</sup> The logic underlying this precedent -- that benefits provided by an employer pursuant to a bona fide and generally administered leave program lack the unique connection to a federal election that is required to treat them as a contribution under the Act -- applies with equal or greater force to the context of an educational stipend. Therefore, in evaluating whether or not the Hubbard Center Stipend, which would only cover basic travel and subsistence benefits for Ms. Houghtalen, would result in a contribution under the Act, the Commission should apply the standard outlined in 11 CFR § 100.54(c).

The Hubbard Center Stipend is analogous to the types of continued benefit programs the Commission approved in Advisory Opinions 1992-03 and 2014-14. In keeping with the programs approved in these prior opinions, the Hubbard Center Summer Internship Grant Program is generally available to all students and was not created specifically for the benefit of Ms. Houghtalen or HFA. Further, in offering the Hubbard Center Stipend to Ms. Houghtalen, DePauw is merely affording her with the same treatment that it gives to all other students whose internships meet the basic requirements of the generally administered program. While the University did make a basic determination that the HFA Internship met the programmatic requirements, this determination was made pursuant to an established and uniformly applied Scoring Rubric, in stark contrast to the unguided, discretionary determination that the Commission rejected in Advisory Opinion 2000-01.

In this same vein, unlike the internship stipend programs considered by the Commission in the past, the Hubbard Center Stipend is being offered to Ms. Houghtalen regardless of, rather than contingent upon, the political nature of the work she is performing.<sup>32</sup> As suggested by past Commission precedent, the connection to a federal election is naturally stronger where a stipend program requires, as a necessary pre-condition, that the student engage in political work in order to receive funding for their internship.<sup>33</sup> Here, however, the Hubbard Center Stipend is being provided without regard to the political nature of Ms. Houghtalen's work. Therefore, in contrast to prior programs considered by the Commission, the Hubbard Center Stipend lacks the requisite connection to a federal election to be treated as a contribution under the Act and Commission regulations. Nevertheless, as noted above, to the extent that previous advisory opinions (*e.g.*, FEC Adv. Ops. 1979-67 (RNC/DNC); 1985-17 (Congressional Youth Leadership Council); 1982-31 (Koeing); 1982-60 (American Society of Mechanical Engineers)) suggest otherwise, they should be distinguished or overruled.

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<sup>31</sup> See FEC Adv. Ops. 1992-03 (Reynolds Metal); 2014-14 (Trammell).

<sup>32</sup> See *e.g.*, FEC Adv. Ops. 1979-67 (RNC/DNC) (requiring the internship to be at the Democratic National Committee or the Republican National Committee and either a Senate or Congressional office or a campaign headquarters for the participant's home state); 1985-17 (Congressional Youth Leadership Council) (requiring the internship to be at a Senator or Representative's office or on a Congressional committee staff).

<sup>33</sup> See *id.*

Therefore, the Commission should find that under the standard outlined in 11 C.F.R. § 100.54(c), Ms. Houghtalen may accept the Hubbard Center Stipend without a contribution to HFA resulting as the Stipend will not give rise to the receipt of compensation under the Act and, accordingly, will also not be provided in connection with a federal election or to influence a federal election.

D. Ms. Houghtalen may alternatively accept the Hubbard Center Stipend specifically for the time she spent assisting the Campaign with legal and accounting work to help ensure compliance with the Act without a contribution to HFA resulting.

The Act specifically exempts out from the definition of a “contribution” legal or accounting services that are rendered to an authorized committee of a candidate so long as the person paying for such services is the regular employer of the individual rendering the services and the services are provided solely for the purpose of ensuring compliance with the Act.<sup>34</sup>

The Commission has specifically applied this exception to the school-student context, finding it permissible for a law school to provide an internship program stipend to a student for time spent providing legal and accounting services to a campaign to help ensure compliance with the Act.<sup>35</sup> In evaluating the proposal, the Commission found the school’s stipend program to be the “regular employer” of the law student as the program had “the usual attributes of a regular employment relationship,” namely that the stipend was provided regardless of whether the student worked for the campaign or some other organization meeting the program’s criteria and that the stipend was taxed as income.<sup>36</sup> Accordingly, the Commission held that the stipend fit within the legal and accounting exception and would not result in a prohibited corporate contribution.<sup>37</sup> Further, the Commission noted that the student’s acceptance of the stipend for services provided to the campaign specifically to ensure compliance with the Act did not prohibit the student from simultaneously spending a proportionate amount of uncompensated time providing other services to the campaign.<sup>38</sup>

The Hubbard Center Stipend was similarly offered to Ms. Houghtalen because the HFA Internship met the general requirements of the Summer Internship Grant Program. Upon receipt by Ms. Houghtalen, the Stipend will also be taxed as income. Therefore, the Commission should find that for the purposes of the Act, the Hubbard Center Summer Internship Grant Program is the regular employer of Ms. Houghtalen and may, under 11 C.F.R. § 100.86, provide her with the Stipend solely to cover the portion of her time spent assisting with legal and accounting services to help ensure compliance with the Act, and not to cover the portion of time she spent

<sup>34</sup> 11 C.F.R. § 100.86; *see also id.* § 114.1(a)(2)(vii).

<sup>35</sup> *See* FEC Adv. Op. 1982-31 (Koenig).

<sup>36</sup> *Id.*

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*

engaged in other substantive activities during the HFA Internship, without a contribution to HFA resulting.

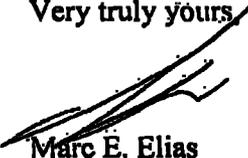
E. Ms. Houghtalen may accept Extended Studies Credit from DePauw for time spent interning with HFA without a contribution to HFA resulting as school credit is not a form of compensation under the Act.

Under Commission precedent, college credit that is awarded to a student in a non-partisan manner and pursuant to accepted accreditation standards is not a form of compensation for purposes of the Act.<sup>39</sup> Therefore, it is permissible for DePauw to provide Ms. Houghtalen with Extended Studies Credit for the HFA Internship, as the credit does not constitute compensation under the Act and will not result in DePauw making an impermissible contribution to the Campaign.<sup>40</sup>

### III. CONCLUSION

Pursuant to the above, we respectfully ask the Commission to confirm the permissibility of Ms. Houghtalen accepting the Hubbard Center Stipend and Extended Studies Credit for the time she spent interning with HFA. Any conclusion to the contrary will do nothing but limit access to political internships to the lucky few students who have the financial ability to support themselves without assistance. The Act should not be expansively read to place such an unnecessary financial barrier in front of students of ordinary means who wish to immerse themselves in the federal electoral process and become active participants in our democratic system.

Very truly yours,



Marc E. Elias  
Jacquelyn K. Lopez

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<sup>39</sup> FEC Adv. Op. 1975-100 (Moss).

<sup>40</sup> See *id.*

# APPENDIX A



## Hubbard Center 2015 Summer Internship Grant Program

### Introduction and Guidelines:

The Hubbard Center Summer Internship Grant Program exists to assist students with summer internship experiences. The internships supported by this competitive program will provide a learning experience that connects summer work to individual academic and professional goals. Students must secure their own internship placement prior to submitting a grant application, and if selected, will be **supported for the summer in the amount of UP TO \$3,000**. The Hubbard Center staff is available to provide you with resources and assist you with your summer internship search.

### Qualifications:

In order to be eligible, students must have secured their internship placements before submitting this application. The Hubbard Center Summer Internship Grant Program supports students in pursuing high-quality and professionally relevant internships that might otherwise be cost-prohibitive, so preference will be given to students with offers of **unpaid internships in non-profit, government, and start-up environments**. Because of the obligations associated with this grant program, students must be full-time and returning to DePauw as a student for the Fall 2015 semester.

DePauw summer internship programs are coordinated by the Hubbard Center and can qualify for Extended Studies credit; registration for COMM 299 is a separate process with its own requirements.

### Conditions of the grant:

Students selected from the applicants for this award will be **supported in the amount of UP TO \$3,000**; awards will be paid in two installments over the summer. In addition to meeting the obligations and duties established by internship hosts, all participants are expected to actively communicate with the DePauw community about their experiences both during and after their internships. Participants will establish and maintain a blog (with weekly entry requirements) and participate in a summer internship information symposium during fall term. Recipients are expected to fulfill all obligations of the Hubbard Center Summer Internship Grant Program in order to receive all installments of the award.

### Application Process:

Students interested in applying for an internship grant should meet with a member of the Hubbard Center's advising staff in preparation of their application materials. Guidelines for application materials are also included in this application packet. The following materials must be submitted by the deadline in consideration for this grant; students must include their name and student ID on all documents.

- Application form (included in packet)
- Application letter- Addressed to review committee
- Contract completed in TigerTracks
- Résumé
- Budget

***Application Deadline: April 15, 2015 | Awards Announced: April 22, 2015***



## Hubbard Center 2015 Summer Internship Grant Program

### Application Form

Provide information for all requested fields, and submit to [redacted] at the Kathryn. F. Hubbard Center for Student Engagement (Union Lobby) no later than 11:59 pm, April 15th

<b>Student Name</b>		<b>Class (please circle rising rank)</b> Sophomore    Junlor    Senior		<b>Major (intended)</b>	
<b>Student ID# (as appearing on DPU id card)</b>		<b>Will you be living on campus during your internship?</b> ___ Yes    ___ No		<b>U.B. Box #</b>	
<b>Summer Mailing Address</b>		<b>City</b>		<b>State</b>	<b>Zip</b>
<b>Mobile Phone Number</b>			<b>DePauw Email Address</b>  @depauw.edu		

<b>Host Supervisor Name</b> Mr. Mrs. Ms. Dr.		<b>Host Supervisor Title</b>			
<b>Organization Name</b>		<b>Host Supervisor Phone</b>		<b>Host Supervisor Fax</b>	
<b>Summer Mailing Address</b>		<b>City</b>		<b>State</b>	<b>Zip</b>
<b>Host Supervisor Email</b>			<b>Web Address</b>		

Read and sign the following to complete your application:

I certify that the terms of my internship are consistent with the following prerequisite conditions; please initial to confirm:

- I have met with a member of the Hubbard Center advising staff to discuss my options and my application materials
- I am currently a full-time student, and will be returning to DePauw University's campus in the fall of 2015.
- My host is not a family member.
- My internship does not duplicate a past experience (i.e. you are not returning to a past internship host in the same capacity as previously employed)



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I understand that my internship is a professional responsibility, and I commit to full participation and satisfactory completion as outlined in the posted guidelines. If, for whatever reason, I am unable to complete my internship as reported in this application, I will notify the Hubbard Center for Student Engagement immediately.

I have completed and attached each of the following documents with this registration form; please indicate with x (\*affix student last name and id# to each submitted page):

Application and letter  
 Résumé

Budget  
 Contract (TigerTracks)

\_\_\_\_\_  
Student Signature

\_\_\_\_\_  
Date



## **Summer Internship Grant Program Application Letter Guidelines**

Please use a formal letter format to complete your application statement. This letter should be free of grammar, spelling, and punctuation errors, and be concise and professional in terms of content, style, and tone. If you have any questions about your application letter structure, format, or content, please do not hesitate to visit the Hubbard Center for Student Engagement to review with a member of our advising staff.

Please note that the reader for this option of the grant is the Hubbard Center Summer Grant Review Committee; be sure to address the correct audience as this is not merely a duplicate of the cover letter sent to your host to secure the internship.

Make sure to address the following:

### **Why you have pursued this particular internship.**

- Let the reader know exactly how you learned about the position. If there is a personal, faculty or alumni connection this is where you make that connection.
- What was the process by which you secured this internship experience?

### **What you know about the employer and position you've secured.**

- Be clear about the specific skills or experiences sought for this position. What is it about the employer that is attractive to you? What recent projects, accomplishments or aspirations of the employer do you find compelling?
- Include your primary objectives for this experience – how does this internship relate and connect to your academic, personal, and professional goals?
- Discuss your perceived responsibilities and assignments. Demonstrate that you've researched the organization and position.

### **Where you have demonstrated that you have used the skills they need.**

- Describe your background in this field. What experiences have prepared you for this internship, and why is this a good "next step" for you?
- Students also prepare for internships through coursework, research, reading, and by having conversations with fellow students, faculty advisors, career advisors, and professionals. What have you done to prepare for your internship thus far?



**Competitive Summer Internship Award Budget Worksheet**

Students must submit a budget for their internship experience to demonstrate consideration of and planning for the costs of pursuing a summer unpaid internship. The dollar amounts of the budgets will factor into these awards, and the effort put into understanding your summer living costs will be taken into account.

Please describe your arrangements for each of the following, and include a dollar amount estimate of all costs.

**Airfare:**

**Luggage fees:**

**Personal vehicle use:**

**Public transportation:**

**Highway tolls or airport taxes:**

**Breakfast:**

**Lunch:**

**Dinner:**

**Rent or other housing cost:**

**Utilities:**

**Project-related expenses and miscellaneous costs:**

**Other:**

**Please also list and explain any outside support and/or funding sources:**

## APPENDIX B

1. Summer Internship Grant Application Letter Assessment	Below Average (1 point)	Average (2 points)	Above Average (3 points)	ROW SCORE
<i>Why have you pursued this particular internship?</i>	Mentions how applicant secured the internship, but nothing about why this specific internship is valuable to them. (assign 1pt)	Mentions how internship was secured, and gives an example of why this internship will be a valuable learning experience. (assign 2pts)	Mentions how internship was secured, and clearly articulates the relevance of the internship to future career goals by citing several examples of why the internship will be a valuable learning experience. (assign 3pts)	
<i>What do you know about the employer and position you've secured?</i>	Applicant does not explain why this specific organization is attractive to them. Student has not demonstrated that they have researched the organization and position. (assign 1pt)	Mentions a reason why this specific organization is attractive, and mentions generally how this internship relates to academic, personal and professional goals. Discusses perceived responsibilities and assignments. (assign 2 pts)	Gives several examples of why this specific organization is attractive, including citing examples of accomplishments and recent projects that are of interest to student. Gives several examples of learning objectives for the experience and how it will impact their future career goals (assign 3 pts)	
<i>Where have you demonstrated that you have used the skills they need?</i>	Provides limited information about past experiences that might have helped prepare student for this internship. Cannot answer the question "why is this a good next step" for you? (assign 1 pt)	Mentions more than one past experience where skills were developed that are relevant to this internship. (assign 2 pts)	Mentions several examples of skills developed from former experiences. Internship is purposeful with regard to future career goals, and responsibilities and projects are clearly outlined to provide an in-depth experience focusing on applicants learning objectives and interests as articulated in letter (3 pts)	
2. Overall Benefit of Internship to Student (Committee Discussion - Assessment Pieces could include: intent letter, budget, host confirmation form)	Completed application (all documents turned in). Not enough information about why this internship will help prepare student for future career success. Cannot clearly make a connection between the internship focus and applicants future academic or career goals and success. (assign 1 pt)	All documents turned in. Internship experience is relevant to applicants interests and goals, but duties and responsibilities are vague. (assign 2 pts)	All documents turned in. Internship is purposeful with regard to future career goals, and responsibilities and projects are clearly outlined to provide an in-depth experience focusing on applicants learning objectives and interests. (assign 3 pts)	
3. RESUME Assessment	Too long or short, major font issues, too much white space, Multiple spelling and/or grammar errors. Missing crucial information. Institution listed, but not its location and graduation date.No order to descriptions of each position, and not bullet pointed. Not detailed and does not illustrate the experience. No locations and dates of employment are listed. Relevance to internship: Does not highlight relevant experience and/or skills as it relates to nature of internship (assign 1-2 points)	Average, font and spacing is not appealing, and some uneven white space. Few spelling or grammar errors. Most info is included, but one or two elements missing (major, grad year, etc...). Fairly well organized but might also be missing "extra" information (study abroad, coursework). Most information is included, but bullet points are not detailed enough to help the reader understand the experience. Relevance to internship: Experience relevant to internship are listed, but not positioned to highlight skills needed for internship. (assign 2-3 pts)	Fills page but is not overcrowded. There are no grammar or spelling errors. Organized, clear and well defined. Highlights the most pertinent information and includes: Institution and location, graduation date, major, GPA, study abroad, and relevant course work. This section is well defined, and information relates to the intended career field. Places of work, location, titles, and dates are included in each position. Clear descriptions, and good action verbs. Good formatting. Relevance to Internship: Experience and relevant skills are highlighted by splitting into related and other experiences. (assign 3-5 pts)	
Resume Quality and Clarity				

ASSESSMENT TOTAL						(Max 17 pts)
BUDGET (realistic summer living costs- committee evaluates together)						
Additional Points (committee discusses):						
Placement Type: Non-Profit/Gov/Start-Up/Unpaid						
Local Partner ?						
Class Year (tebreaker) ?						
Former award recipient (tebreaker?)						
FINAL TOTAL (includes additional competitive points- MAX OF 18 points)						

- \*This application letter should be well written and organized, free of grammar, spelling, and punctuation errors, and be concise and professional in terms of content, style, and tone. The following should be addressed:
- Why you have pursued this particular internship.
- Let the reader know exactly how you learned about the position. If there is a personal, faculty or alumni connection this is where you make that connection.
  - What was the process by which you secured this internship experience?
  - What you know about the employer and position you've secured.
  - Be clear about the specific skills or experiences sought for this position. What is it about the employer that is attractive to you? What recent projects, accomplishments or aspirations of the employer do you find compelling?
  - Include your primary objectives for this experience – how does this internship relate and connect to your academic, personal, and professional goals?
  - Discuss your perceived responsibilities and assignments. Demonstrate that you've researched the organization and position.
  - Where you have demonstrated that you have used the skills they need.
  - Describe your background in this field. What experiences have prepared you for this internship, and why is this a good "next step" for you?
  - Students also prepare for internships through coursework, research, reading, and by having conversations with fellow students, faculty advisors, career advisors, and professionals..What have you done to prepare for your internship thus far?

## APPENDIX C

Back Menu [denauw-esm.simplicity.com]

Keyword Search Internship List

### May/Summer Internship 2015 : Victoria Aline Houghtalen - (Hillary for America )

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Edit [denauw-esm.simplicity.com]

Edit cancel print preview

#### Internship Contract

Student First Name (Given Name) Victoria

Student Last Name (Given name) Houghtalen

Student Houghtalen Victoria [redacted]

Internship Term May/Summer Internship 2015

Campus Mailing Address [redacted]

Home Mailing Address [redacted]

Phone (during your internship) [redacted]

Host Organization Hillary for America

Assigned Contact [redacted]

Type Summer internship

Organization street address [redacted]

Organization City and State [redacted]

Organization zip code [redacted]

Organization Web Site <https://www.hillaryclinton.com/hillaryclinton.com/>

Supervisor Name [redacted]

Supervisor Department Internship

Supervisor Title Internship Manager

Supervisor Phone N/A

Supervisor Email [redacted]

Industry Campaign

Internship Title Vetting Department Intern

Select how you secured your short-term internship? DPU Alumni

Student Duties Although I haven't received too much information, I know that I will be working in the Vetting department, the department that works will background checks on donations to the campaign. I think I will be working on donation outreach to the public, a vital part of functioning in a federal election

Learning Outcome 1 I already explored elected gov't officials offices, I want to see if I enjoy the campaign scene.

Learning Outcome 2 I want to learn the everyday workings of a campaign. I read analysis on different campaign tactics when they are produced in the news, but there must be some day-to-day info that doesn't get published.

Learning Outcome 3 I want to be able to independently live on my own in a big city while managing a job. I've never been to New York before, so I'm ready for the challenge!

Student Agreement Signature Victoria Houghtalen

#### Approval Status

Manager Approved Approved

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# APPENDIX D



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## Hubbard Center 2015 Summer Internship Grant Program

### Introduction and Guidelines:

The Hubbard Center Summer Internship Grant Program exists to assist students with summer internship experiences.

The internships supported by this competitive program will provide a learning experience that connects summer work to individual academic and professional goals. Students must secure their own internship placement prior to submitting a grant application, and if selected, will be **supported for the summer in the amount of UP TO \$3,000**. The Hubbard Center staff is available to provide you with resources and assist you with your summer internship search.

### Qualifications:

In order to be eligible, **students must have secured their internship placements before submitting this application**. The Hubbard Center Summer Internship Grant Program supports students in pursuing high-quality and professionally relevant internships that might otherwise be cost-prohibitive, **so preference will be given to students with offers of unpaid internships in non-profit, government, and start-up environments**. Because of the obligations associated with this grant program, students must be full-time and returning to DePauw as a student for the Fall 2015 semester.

DePauw summer internship programs are coordinated by the Hubbard Center and can qualify for Extended Studies credit; registration for COMM 299 is a separate process with its own requirements.

### Conditions of the grant:

Students selected from the applicants for this award will be **supported in the amount of UP TO \$3,000**; awards will be paid in two installments over the summer. In addition to meeting the obligations and duties established by internship hosts, all participants are expected to actively communicate with the DePauw community about their experiences both during and after their internships. Participants will establish and maintain a blog (with weekly entry requirements) and participate in a summer internship information symposium during fall term. Recipients are expected to fulfill all obligations of the Hubbard Center Summer Internship Grant Program in order to receive all installments of the award.

### Application Process:

Students interested in applying for an internship grant should meet with a member of the Hubbard Center's advising staff in preparation of their application materials. Guidelines for application materials are also included in this application packet. The following materials must be submitted by the deadline in consideration for this grant; students must include their name and student ID on all documents.

- Application form (included in packet)
- Application letter- Addressed to review committee
- Contract completed in TigerTracks
- Résumé
- Budget

***Application Deadline: April 15, 2015 | Awards Announced: April 22, 2015***



## Hubbard Center 2015 Summer Internship Grant Program

### Application Form

Provide information for all requested fields, and submit to [redacted] at the Kathryn F. Hubbard Center for Student Engagement (Union Lobby) no later than **11:59 pm, April 15th**

Student Name Victoria Houghtalen		Class (please circle rising rank) Sophomore Junior Senior		Major (intended) Political Science
Student ID# (as appearing on DPU id card) [redacted]		Will you be living on campus during your internship? ___ Yes ___X___ No		U.B. Box # [redacted]
Summer Mailing Address [redacted]	City [redacted]	State [redacted]	Zip [redacted]	
Mobile Phone Number [redacted]		DePauw Email Address [redacted]		@depauw.edu

Host Supervisor Name [redacted] [redacted]		Host Supervisor Title Internship Manager		
Organization Name Hillary For America		Host Supervisor Phone [redacted]		Host Supervisor Fax N/A
Summer Mailing Address [redacted]	City [redacted]	State [redacted]	Zip [redacted]	
Host Supervisor Email [redacted]		Web Address hillaryclinton.com		

Read and sign the following to complete your application:

I certify that the terms of my internship are consistent with the following prerequisite conditions; please initial to confirm:

  VH   I have met with a member of the Hubbard Center advising staff to discuss my options and my application materials

  VH   I am currently a full-time student, and will be returning to DePauw University's campus in the fall of 2015.

  VH   My host is not a family member.

  VH   My internship does not duplicate a past experience (i.e. you are not returning to a past internship host)



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*In the same capacity as previously employed)*

I understand that my internship is a professional responsibility, and I commit to full participation and satisfactory completion as outlined in the posted guidelines. If, for whatever reason, I am unable to complete my internship as reported in this application, I will notify the Hubbard Center for Student Engagement immediately.

I have completed and attached each of the following documents with this registration form; please indicate with **x** (\*affix student last name and id# to each submitted page):

Application and letter  
 Résumé

Budget  
 Contract (TigerTracks)

Victoria Houghtalen  
Student Signature

05/19/2015  
Date



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## **Summer Internship Grant Program Application Letter Guidelines**

Please use a formal letter format to complete your application statement. This letter should be free of grammar, spelling, and punctuation errors, and be concise and professional in terms of content, style, and tone. If you have any questions about your application letter structure, format, or content, please do not hesitate to visit the Hubbard Center for Student Engagement to review with a member of our advising staff.

Please note that the reader for this option of the grant is the Hubbard Center Summer Grant Review Committee; be sure to address the correct audience as this is not merely a duplicate of the cover letter sent to your host to secure the internship.

Make sure to address the following:

### **Why you have pursued this particular internship.**

- Let the reader know exactly how you learned about the position. If there is a personal, faculty or alumni connection this is where you make that connection.
- What was the process by which you secured this internship experience?

### **What you know about the employer and position you've secured.**

- Be clear about the specific skills or experiences sought for this position. What is it about the employer that is attractive to you? What recent projects, accomplishments or aspirations of the employer do you find compelling?
- Include your primary objectives for this experience – how does this internship relate and connect to your academic, personal, and professional goals?
- Discuss your perceived responsibilities and assignments. Demonstrate that you've researched the organization and position.

### **Where you have demonstrated that you have used the skills they need.**

- Describe your background in this field. What experiences have prepared you for this internship, and why is this a good "next step" for you?
- Students also prepare for internships through coursework, research, reading, and by having conversations with fellow students, faculty advisors, career advisors, and professionals. What have you done to prepare for your internship thus far?



██████████  
Hubbard Center for Student Engagement  
DePauw University

Victoria Houghtalen  
Class of 2018

Hubbard Center Summer Grant Review Committee:

I found my passion for politics in eighth grade, and I have pursued that passion tirelessly ever since. It was this same passion that landed me at DePauw; I saw the opportunities available in the social sciences if I was willing to work hard enough for it. Luckily for me, I was born at an exciting time in politics so this passion wouldn't go unentertained. I've enjoyed writing opinions for TDP, interning for a Congresswoman, and taking advantage of the Prindle Institute of Ethics in just my first year.

During my second semester, on April 12<sup>th</sup> to be exact, my political ambitions became a lot more exciting as Hillary Rodham Clinton officially announced that she would seek the presidency again. Soon after, I utilized my lessons in Women's Studies to write an opinion piece about the "Ethics of Discourse on Clinton": what is okay to say about her, and what type of discourse is sexist and limiting. This article was forwarded by ██████████ to ██████████, the 2007 DePauw grad in the White House. ██████████ and I continued contact after the article, and she ultimately forwarded my resume on to Hillary For America, the HQ for the Clinton campaign. I was offered an internship with them this past Thursday, May 14<sup>th</sup>.

I know I cannot pass this opportunity up. All the sudden, I was given the chance to enhance my resume from just a Congressional internship to an internship on a revolutionary presidential campaign. Hillary is going to win, and I want nothing more than to work endlessly to make sure that she does. I am prepared for this internship because I have completed a political science and women's studies course already in my first year, securing an A in both courses. Alongside that, I frequently read The NY Times when they produce reports about her campaign strategy. I follow the campaign on social media and in the news; I always know where Hillary is and what she is doing. I also recently purchased her most recent book *Hard Choices* from the campus bookstore. I utilized some of the language and ideas she presented in the introduction in my cover letter that I sent to the campaign. I know Hillary's background, goals, strategy, terminology, and major staffers by heart. All I need now is the experience of working for her.

I was offered a position within the Compliance, Federal Election Commission, and Vetting Department. Although I do not have an outline of my specific duties yet, based on my studies of political science, I figure this is the department that runs background checks on donations made to the campaign. This is the department that secures nothing is going wrong with the financial portion of Hillary for America: that the campaign is constantly abiding by federal election laws and court rulings. Although this isn't my main interest in political campaigning, I am happy to help out in any way that the organization needs me.

So although this summer internship isn't going to be glamorous day-to-day, I hope to utilize my everyday workings into a larger three-year goal. This summer, I want to embody a typical DePauw intern and come in



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early and stay late of my normal office hours. I want to show Hillary for America that I stand out because of my passion and fervor, and I am always willing to lend a hand no matter the task. With this practice, I hope to continue my internship in the summer of 2016, after she wins the democratic primary. The next summer will be much more interesting, and hopefully I will be able to work with the campaign on the road instead of their headquarters in Brooklyn, NY. Then, when HRC (hopefully) wins the presidency, I want to utilize my connections to secure a position in the White House and to be the next representative of a DePauw student in that executive office.

I will always be thankful for [REDACTED] for helping me achieve what is perhaps the biggest opportunity of my lifetime thus far. I only hope to represent DePauw to the best of my ability so that I may pay back the university one day for all that I've been able to reach just in my first year.



## Competitive Summer Internship Award Budget Worksheet

Students must submit a budget for their internship experience to demonstrate consideration of and planning for the costs of pursuing a summer internship. While dollar amounts of the budgets will not factor into these awards, the effort put into understanding the costs of participation will be taken into account.

Please describe your arrangements for each of the following, and include a dollar amount estimate of all costs.

**Airfare:**

Dates	Price	Information
Depart IND [redacted] on [redacted] 1 Stop in Charlotte Arrive LGA [redacted] on [redacted]	\$371 round trip, return on [redacted]	US Airways [redacted]

Luggage fees: First Bag: \$25, Second Bag: \$35

Personal vehicle use: N/A

Public transportation: Taxi from LaGuardia Airport to [redacted] \$44 with tip  
Subway pass \$30 x two months = \$60

Highway tolls or airport taxes: N/A

Breakfast: \$50 per week in groceries x 8 weeks = \$400

Lunch: \$30 x 5 business days = \$150 per week x 8 weeks = \$1200

Dinner: (see groceries budgeting)

Rent or other housing cost: Renting a room in [redacted] - cost: \$1300 x 2 months = \$2,600

Utilities: N/A



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**Project-related expenses and miscellaneous costs:**

**Other:**

**Total cost: \$4,735**

**Please also list and explain any outside support and/or funding sources: Family, personal savings, selling college textbooks online**