

0-32-77

STATE OF NEW JERSEY  
ELECTION LAW ENFORCEMENT  
COMMISSION  
NATIONAL STATE BANK BLDG.  
SUITE 1114  
TRENTON, N. J. 08605  
(609) 292-8700

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COUNSEL

October 12, 1977

Daniel A. Rowan, Treas.  
Frank Flowers for Governor Committee  
Interstate 295  
Thorofare, New Jersey 08086

Re: The New Jersey Campaign Contributions and Expenditures  
Reporting Act, Chapter 83, Laws of 1973 as  
Amended and Supplemented ("the Act")  
Your Letter Dated August 11, 1977  
Opinion #(0-32-77)

Dear Mr. Rowan:

Your letter dated August 11, 1977 to the New Jersey Election  
Law Enforcement Commission ("the Commission"), including a  
request for advisory opinion, has been forwarded to me for  
reply.

Section 19:25-15.15 of the Regulations of the Commission  
provides generally that contributions in the form of a  
purchase price paid for a chance to participate in a raffle,  
lottery or similar drawing for valuable prizes, among other  
things, shall be contributions eligible for match and for  
purposes of the \$600 limitation, only to the extent of the  
value of the contribution in excess of the fair market value  
of the item or benefit conferred upon the contributor.

In the view of the Commission, the value of a ticket  
evidencing a chance to participate in a raffle or lottery or  
similar drawing would be equal to the purchase price paid  
for such ticket, in the absence of facts demonstrating that  
the amount of the purchase price paid exceeded the value of  
the ticket, in which event the difference would be a contri-  
bution eligible for match and subject to the \$600 contribution  
limitation. Accordingly, in the absence of such special  
circumstances, no part of the purchase price of raffle  
tickets in that circumstance would be considered contributions  
eligible for match.

The Commission expresses no opinion as to whether such  
raffles are lawful under the provision for licensing and control  
of the law regarding legalized Games of Chance, N.J.S.A. 5:8-  
51,52 or other applicable law of New Jersey.

Yours very truly,

  
Edward J. Farrell

EJF:jj