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April 3, 1980

Mr. John B. Paoletta
Assemblyman, District 38 Bergen
442 Rochelle Avenue
Rochelle Park, New Jersey 07662

Re: The New Jersey Campaign Contributions and
Expenditures Reporting Act, Chapter 83, Laws
of 1973 as Amended and Supplemented ("the Act")
Your letter dated March 17, 1980
Opinion #0-16-80

Dear Assemblyman Paoletta:

Your letter dated March 17, 1980, to the New Jersey
Election Law Enforcement Commission ("the Commission"),
including a request for advisory opinion, has been forwarded
to me for reply.

A contribution in-kind of an amount of office space in
a private office to be used as a satellite legislative office
would not be regarded by the Commission as a contribution
within the meaning of the Act, assuming that the "satellite
office" was not being used in whole or in part as a campaign
office. If it were so used, then the proportionate share of
the value of the use of the office would be required to be
reported by the candidate as an in-kind contribution.

Yours very truly,

Edward J. Farrell
Legal Counsel

EJF:nc