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July 26 1975

RECEIVED
OCT 10 1975

Ronald E. Bookbinder
P.O. Box 400
513 High Street
Burlington, New Jersey

ELECTION LAW ENFORCEMENT
COMMISSION

Re: The New Jersey Campaign Contributions
and Expenditures Reporting Act,
Chapter 83, Laws of 1973, As Amended and
Supplemented ("the Act")
Your Letter Dated February 27, 1975
Opinion #(0-4-75)

Dear Mr. Bookbinder:

Your letter dated February 27, 1975 to the New Jersey
Election Law Enforcement Commission ("the Commission"),
including a request for advisory opinion, has been forwarded
to me for reply.

In view of the continuing nature of the Club and the
fact that the activities of the Club are necessarily related
closely to the local political activities of the Burlington
Township Democratic Committee, we believe that the Burlington
Township Democratic Club is a political club as defined in
the regulations of the Commission and is subject to the
requirement of filing an annual report and the requirements
related thereto as set forth in the Act and the regulations.
Non-filing by the Club of the report due March 1, 1975 as
described in your letter is protected, up until receipt of
this Opinion and prompt compliance therewith, by virtue of the
provisions of Section 6 of the Act.

Although your letter sets forth certain activities as
principal receipts and principal expenditures of the Act,
you should be aware that, in the event the Club is active in
the campaign efforts on behalf of any candidate, it may in
proper circumstances become a political committee by virtue
of such activity, and may therefore become subject to the
pre-election and post-election reporting provisions of the
Act, in addition to the annual reporting requirements. You

July 25, 1975

should also be aware that any use of a system of receipt of contributions by a club and subsequent use of those contributions in such a way as to conceal identity of donors or to conceal "earmarked" funds would be regarded by the Commission as a violation of the Act.

Yours very truly,

Edward J. Farrell
Legal Counsel

EJF:ja