

September 29, 1976

Marvin D. Perskie, Esq.
Perskie and Callinan, Esqs.
3311 New Jersey Avenue
Wildwood, N. J. 08260

Re: The New Jersey Campaign Contributions and
Expenditures Reporting Act, Chapter 83,
Laws of 1973, as Amended and Supplemented ("the
Act") Your letter dated September 17, 1976
Opinion #0-37-76

Dear Mr. Perskie:

Your letter dated September 17, 1976 to the New Jersey
Election Law Enforcement Commission ("the Commission"), including
a request for advisory opinion, has been forwarded to me for reply.

The facts set forth in your letter, supplemented by your
discussion with Lewis B. Thurston, the executive director of the
Commission, indicate that Leeds & Lippincott Company was the
owner of certain hotel property in Atlantic City. Leeds & Lippin-
cott made a contribution in the approximate amount of \$50,000 to
aid or promote a public question involving gambling in Atlantic
City. This contribution was made to a political committee for
that public question, and was made shortly after Resorts Interna-
tional, Inc. obtained substantially all of the stock of Leeds &
Lippincott Company.

Based on the foregoing, Leeds & Lippincott Company does
not become a political committee by virtue solely of such contri-
bution, and it is sufficient under the Act for the political committee
to whom the contribution was made to report the contribution giving
the name and address of Leeds & Lippincott, as a wholly-owned sub-
sidiary of Resorts International, Inc., as contributor and the amount
of the contribution. In the circumstances of this case, the
campaign reports of Resorts International, Inc. should indicate in
footnote form that Leeds & Lippincott, their wholly-owned subsidiary,
made the contribution of the specified amount to the Committee to
Rebuild Atlantic City.

Yours very truly,

EDWARD J. FARRELL
Legal Counsel