

U-30-77

STATE OF NEW JERSEY
ELECTION LAW ENFORCEMENT
COMMISSION

LEWIS B. THURSTON, III
EXECUTIVE DIRECTOR

FRANK P. REICHE
CHAIRMAN
SIDNEY GOLDMANN
VICE CHAIRMAN
JOSEPHINE S. MARGETTS
ARCHIBALD S. ALEXANDER

NATIONAL STATE BANK BLDG.
SUITE 1114
TRENTON, N. J. 08605
(609) 292-8700

RECEIVED

EDWARD J. FARRELL
COUNSEL

AUG 24 '77

N. J. ELECTION
LAW ENFORCEMENT
COMMISSION

August 15, 1977

Thomas L. Saybolt, Esq.
Ford Motor Company
The American Road
Dearborn, Michigan 48121

Re: The New Jersey Campaign Contributions and Expenditures
Reporting Act, Chapter 83, Laws of 1973 as
Amended and Supplemented ("the Act")
Your Letter dated June 21, 1977
Opinion #(0-30-77)

Dear Mr. Saybolt:

Your letter dated June 21, 1977 to the New Jersey Election
Law Enforcement Commission ("the Commission"), including a
request for advisory opinion, has been forwarded to me for
reply.

Since the receipt of your letter, the Commission has
proposed a regulation which I believe deals with most of the
questions raised in your letter. A copy of the proposed
regulation is enclosed for your review. We would welcome
your comments with respect to the proposed regulation, either
before or at the public hearing scheduled for August 25,
1977, and invite you to submit any questions contained in
your request for advisory opinion which do not appear to be
answered by the provisions of the proposed regulation.

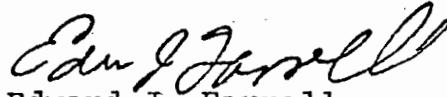
With respect to the specific procedures described in
your letter, certain observations can be made. First, where
the Ford Civic Action Fund collects checks payable to the
campaign treasurer of the gubernatorial candidate from
individual contributors whose individual contributions do
not exceed \$600, the collection and forwarding to the candidate
of those checks by the Ford Civic Action Fund does not in
the view of the Commission represent a contribution by the
Fund. Second, the collection of checks or other funds either
made payable to the Ford Civic Action Fund or deposited in
an account of the Ford Civic Action Fund (in New Jersey or
elsewhere) would in general make those funds the funds of
the Ford Civic Action Fund and a contribution from those
funds would be a contribution from the Ford Civic Action

August 15, 1977

Fund and would be limited to an amount not in excess of \$600. The foregoing determination would appear to render moot the question of allocation of expenditures by the Ford Civic Action Fund, since its contribution to any gubernatorial candidate would be limited to an amount not in excess of \$600.

On the facts set forth in your letter, the New Jersey requirements with respect to disclosure would appear to be capable of being satisfied by submission to the New Jersey Election Law Enforcement Commission of copies of the reports required to be filed by the Ford Civic Action Fund with the Federal Election Commission.

Yours very truly,



Edward J. Farrell
Legal Counsel

EJF:jj
Enclosure

0-30-77

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

FRANK P. REICHE
CHAIRMAN
SIDNEY GOLDMANN
VICE CHAIRMAN
JOSEPHINE S. MARGETTS
ARCHIBALD S. ALEXANDER

LEWIS B. THURSTON, III
EXECUTIVE DIRECTOR
EDWARD J. FARRELL
COUNSEL

September 26, 1977

Thomas L. Saybolt, Esq.
Ford Motor Company
The American Road
Dearborn, Michigan 48121

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 23, 1977
Opinion # (0-30-77)

Dear Mr. Saybolt:

Your letter dated August 23, 1977 to the New Jersey Election
Law Enforcement Commission ("the Commission"), including a re-
quest for advisory opinion has been forwarded to me for reply.
This letter supplements our earlier letter to you dated
August 15, 1977.

In the view of the Commission the Act requires the Ford
Civic Action Fund to designate a depository which is authorized
to transact business in New Jersey, in the circumstances described
in your original letter. Contributions from New Jersey residents
to the Ford Civic Action Fund, including those made directly to
the Ford Civic Action Fund in Michigan, must be deposited to the
account of the New Jersey campaign depository of the Ford Civic
Action Fund. All contributions from the Ford Civic Action Fund
to New Jersey candidates must likewise be made from the New
Jersey campaign depository of the Ford Civic Action Fund.

There is a limitation of \$600 upon contributions of any
individual to or on behalf of a candidate in the general
election for the office of Governor of New Jersey. On the
facts set forth in your letter, contributions from New Jersey
residents (or any other persons) would become the funds of the
Ford Civic Action Fund upon deposit in the principal campaign de-
pository or any other depository of the Ford Civic Action Fund,

Thomas L. Saybolt, Esq.

-2-

September 26, 1977

and the total amount of contribution to a candidate in the general election for the office of Governor of New Jersey from those funds would be limited to an amount not in excess of \$600.

The Commission appreciates receiving your views with respect to the proposed regulations and has taken them into consideration in its discussion of the proposed regulations.

Very truly yours,


Edward J. Farrell
Legal Counsel

EJF:jj