

0-34-77

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AUG 26 '77  
N.J. ELECTION  
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August 24, 1977

Robert S. Raymar, Esq.  
Messrs. Hellring, Lindeman,  
Landau & Siegal  
1180 Raymond Boulevard  
Newark, New Jersey 07102

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 23, 1977  
Opinion #(0-34-77)

Dear Mr. Raymar:

Your two page letter dated June 23, 1977 relating to  
Regulation 19:25-15.12(d) to the New Jersey Election Law  
Enforcement Commission ("the Commission"), including a request  
for advisory opinion has been forwarded to me for reply.

The Commission is generally in accord with the statements  
contained in the first full paragraph and the second full  
paragraph on page 2 of your letter. The Commission is, however,  
unable to conclude that the requirement of endorsement  
by the State or New Jersey Chapter of some national independent  
or AFL-CIO affiliated unions would not undermine the independence  
required by the regulation. Such a condition of endorsement,  
together with the other facts, would have to be determined on a  
case by case basis by the Commission in order to reach  
a specific conclusion as to whether such contribution was  
in fact an independent contribution by the union local.

Yours very truly,

*Edward J. Farrell*  
Edward J. Farrell  
Legal Counsel

EJF:jj