



State of New Jersey

ELECTION LAW ENFORCEMENT COMMISSION

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FEB 15 1981
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February 10, 1981

Mr. Joseph H. Furnari
Managing Director
American Lung Association of New Jersey
2441 Route 22 West
Union, New Jersey 07083

Re: The New Jersey Campaign Contributions and
Expenditures Reporting Act, Chapter 83, Laws
of 1973 as Amended and Supplemented ("the Act")
Your letter dated January 16, 1981
Opinion #0-01-81

Dear Mr. Furnari:

Your letter dated January 16, 1981 to the New Jersey
Election Law Enforcement Commission ("the Commission"), including
a request for advisory opinion, has been forwarded to me for
reply.

It is not entirely clear from your letter what is meant
by your statement that you do not expend contributor funds
directly to influence legislation. Under the statute of New
Jersey, the expenses of preparation of materials which are
communicated to legislators and other similar direct dealings
with legislators would be regarded as direct expenditures.
In the event that those expenditures exceed \$2,500 during
a calendar year, there would be an obligation of reporting
under the New Jersey statute. It is not clear from your letter
whether the staff time which you describe would involve such
expenditure in excess of \$2,500. (See New Jersey Regulation
19:25-8.5) If you are not clear on the question, I would
suggest that you provide us with further detail as to the
kinds and amounts of expenditures, and we will attempt to
resolve the question for you.

Where accounting is handled through existing bank accounts,
the Commission will accept the use of these accounts for the
normal lobbying activities. (See New Jersey Regulation 19:25-
8.10(d)) In such case, it would not be necessary to set up
separate accounts.

Yours very truly,

Edward J. Farrell
Edward J. Farrell

Legal Counsel

EJF:no