



State of New Jersey

ELECTION LAW ENFORCEMENT COMMISSION

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May 11, 1981

Robert S. Raymar, Esquire
1180 Raymond Boulevard
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Re: The New Jersey Campaign Contributions and
Expenditures Reporting Act, Chapter 83, Laws
of 1973 as Amended and Supplemented ("the Act")
Your letter dated April 24, 1981
Opinion #0-15-81

Dear Mr. Raymar:

Your letter dated April 24, 1981, to the New Jersey
Election Law Enforcement Commission ("the Commission"),
including a request for advisory opinion, has been for-
warded to me for reply.

With respect to your first question, the use by a
candidate of his or her own vehicle in connection with
campaign related travel and transportation would not be
regarded by the Commission as a contribution by the
candidate to his campaign of the reasonable commercial
value of the use of the vehicle, and would not be regarded
as an expenditure includable in the calculation of the
\$25,000 limitation upon expenditures from a candidate's
own funds.

With respect to your second question, no portion of
the salary of a campaign scheduler, as described in your
letter, would be excludable from the limit on campaign
expenditures as "reasonable and necessary expenses of
transportation" pursuant to N.J.A.C. 19:25-16.28. That
section of the regulations limits the exclusion to the
reasonable and necessary expenses of transportation, food
and lodging, of staff members traveling with the candidate
in the same or accompanying vehicles.

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With respect to your third question, the expenses of "advance" persons as described in your letter would not be excludable from the expenditure limitation. The scope of the travel exemption is necessarily limited by the intent of the statutory exemption. The Commission feels that the provisions of the regulations are sufficiently clear, and cannot reasonably be extended to include the expenses of "advance" staff as described in your letter. No part of the salary of such persons would be excludable in any event, since the exclusion provided by the regulation is limited to expenses related to travel and does not include salary.

Yours very truly,


Edward J. Farrell
General Counsel

EJF:no