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COURSEL

September 19, 1985

Margo L. Lavine, Esquire Carro, Spanbock, Pass, Geller, Kaster & Cuiffo Law Offices 1345 Avenue of the Americas New York, New York 10105

Re: Advisory Opinion 16-1985

Dear Ms. Levine:

I have been requested by the New Jersey Election Law Enforcement Commission to respond to your letter dated August 16, 1985.

It is the view of the Commission that because Mr. Green in his letter dated August 13, 1985 indicated that Glickenhaus & Co. has no plans to make further contributions in New Jersey, it is not a continuing political committee. However, because Glickenhaus & Co. made a contribution of over \$10,000 in any election, it is required to report as a political committee, pursuant to the definition of political committee in N.J.A.C. 19:25-1.7(2). (The section presently refers to a contribution of over \$10,000 in any calendar year; it is in the process of being amended to read contribution of over \$10,000 in any election.)

As a political committee, Glickenhaus & Co. must file a 29-day preelection campaign report for the 1985 general election disclosing the \$15,000 contribution, and any other campaign related activity. If the contributed funds derived from general partnership funds, the partnership may simply report the contribution it made and the entity receiving it. However, if the funds were derived from individual partners, each partner who provided funds for the contribution and the amount contributed from that partner should be disclosed. The partnership may endorse the 29-day preelection report as its final report if after the 29-day reporting period no other campaign disbursements are anticipated for the 1985 general election.

Margo L. Levine, Esq. Page 2 September 19, 1985

The status of Glickenhaus & Co. would not change if additional contributions were made this year. The additional contributions should be included in the reports filed.

Very truly yours,

NEW JERSEY ELECTION LAW ESPONCEMENT COMMISSION

Edward J. Farrell
Counsel