



State of New Jersey

ELECTION LAW ENFORCEMENT COMMISSION

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Respond to:
P.O. Box 185
Trenton, New Jersey 08625-0185

(609) 292-8700 or Toll Free Within NJ 1-888-313-ELEC (3532)

Website: <http://www.elec.state.nj.us/>

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January 10, 2018

Rajiv D. Parikh, Esq.
Genova Burns LLC
494 Broad Street
Newark, NJ 07102

Advisory Opinion No. 01-2018

Dear Mr. Parikh:

Your request for an Advisory Opinion has been reviewed and I am issuing this response pursuant to N.J.S.A. 19:44A-6(f). You submitted your request on behalf of Celebrate New Jersey Now, Inc. (CNJN). Your submission was received by the New Jersey Election Law Enforcement Commission (Commission) on December 26, 2017.

Your request pertains to whether the limitations and requirements of N.J.S.A. 19:44A-18.1 and N.J.A.C. 19:25-15.59 apply to CNJN's activities in connection with gubernatorial inaugural fundraising events. Specifically, you have asked whether CNJN can accept donations in excess of the \$500 contribution limit and accept assistance for gubernatorial inaugural fundraising events from individuals associated with the Governor-elect's inaugural committee. You also asked whether CNJN is subject to the reporting requirements of N.J.S.A. 19:44A-18.1(c) and N.J.A.C. 19:25-15.59(d).

Commission Response

You are advised that CNJN may accept donations in excess of the \$500 contribution limit set forth in N.J.S.A. 19:44A-18.1(a) and that CNJN does not have reporting obligations pursuant to N.J.S.A. 19:44A-18.1(c) and N.J.A.C. 19:25-15.59(d). Further, CNJN is able to obtain assistance from individuals associated with the inaugural committee for the fundraising events specifically addressed in this Advisory Opinion.

Submitted Facts

You indicate that CNJN is incorporated pursuant to N.J.S.A. 15A:2-8 as a non-profit corporation organized as a social-welfare organization under Section 501(c)(4) of the Internal Revenue Code. You state that CNJN would like to host an event(s) during the week preceding January 16, 2018, the inauguration date for Governor-elect Phil Murphy and Lieutenant Governor-elect Sheila Oliver, and that they will be prominent participants (the Events). Further, you state that CNJN would like to accept donations for the Events in excess of the \$500 contribution limit set forth in N.J.S.A. 19:44A-18.1(a). With regard to the funds raised at the Events, you specifically represent that:

(1) [A]ll funds will be deposited directly into the accounts of CNJN; (2) CNJN will not allow any proceeds to be subject to the control of the Governor-elect, the Lieutenant Governor-elect, or Inaugural 2018 Inc., the inaugural committee authorized by the Governor-elect; and (3) no portion of the revenue received from the Events will be used for any political purpose.

Finally, you indicate that all donations received in connection with the Events will be deposited in a segregated CNJN bank account.

Additionally, you state that CNJN would also like to seek assistance from certain individuals associated with Inaugural 2018 Inc. regarding logistical and fundraising efforts related to the Events. You further state that this assistance will be sought with “the understanding that Inaugural 2018 Inc. will not receive any portion of the proceeds of the Events and will not exercise any control over such proceeds.”

Discussion

The New Jersey Campaign Contributions and Expenditures Reporting Act, N.J.S.A. 19:44A-1 et seq. (Campaign Act) imposes on any person, candidate or political committee a \$500 limit, in the aggregate, on all contributions to a “gubernatorial inaugural fund-raising event.” N.J.S.A. 19:44A-18.1(a). A gubernatorial inaugural fundraising event is defined as:

[A]ny event or events held between the date of the general election for the offices of Governor and Lieutenant Governor and a date 15 days after the date of the inauguration of the Governor and Lieutenant Governor, whether the event is sponsored by the inaugural committee, the State political party committee representing the party of the Governor-elect and Lieutenant Governor-elect, or any other person or persons, and at which the Governor-elect or the Lieutenant Governor-elect is a prominent participant or for which solicitations of contributions include the names of the Governor-elect or Lieutenant Governor-elect in prominent display.

N.J.S.A. 19:44A-18.1(b). The person or committee that sponsors a gubernatorial inaugural fundraising event must report all contributions and expenditures. N.J.S.A. 19:44A-18.1(c).

However, the above definition does “not apply to an event sponsored by a religious, charitable, benevolent, scientific, artistic or educational nonprofit institution” provided that the proceeds raised at the event are

not controlled by, nor contributed to, the Governor-elect or Lieutenant Governor-elect, any political committee or political party committee. N.J.S.A. 19:44A-18.1(b).

The Commission has previously advised that events sponsored by nonprofit, charitable organizations would not be subject to the contribution limit set forth in N.J.S.A. 19:44A-18.1(a) where the Governor-elect would be present, but the funds raised would not be subject to the control of the Governor-elect or the inaugural committee. See Advisory Opinion No. 44-1981 (AO 44-1981). The charitable organizations discussed in AO 44-1981 were the New Jersey Historical Society, Friends of Newark Museum and New Jersey Arts Council, and the funds raised were going to be used exclusively for the furnishings of Drumthwacket Mansion, museum purposes, and purposes of the Arts Council, respectively. Id. at p. 1.

The Commission likewise concludes that the Events you have described do not fall within the statutory definition of "gubernatorial inaugural fund-raising event" and therefore the \$500 contribution limit and reporting requirements of N.J.S.A. 19:44A-18.1 and N.J.A.C. 19:25-15.59(d) are not applicable. Regarding receiving assistance by individuals associated with the inaugural committee, neither the Campaign Act nor Commission Regulations (N.J.A.C. 19:25-1 et seq.) limit the assistance of members of the inaugural committee provided to a nonprofit organization in conducting a fundraising event where all the proceeds are going directly to that organization. See also, Advisory Opinion 10-1993, p. 4.

Conclusion

In reliance upon the facts specifically described in your request, you are advised that CNJN may accept donations in excess of the \$500 contribution limit, does not have reporting obligations pursuant to N.J.S.A. 19:44A-18.1(c) and N.J.A.C. 19:25-15.59(d), and can obtain assistance from individuals associated with the inaugural committee. Thank you for your inquiry.

Very truly yours,
Election Law Enforcement Commission

By: 
Demery J. Roberts, Esq.



Advisory Opinion Request For Candidates and Committees

NEW JERSEY ELECTION LAW ENFORCEMENT COMMISSION
P.O. Box 185, Trenton, NJ 08625-0185
(609) 292-8700 or Toll Free Within NJ 1-888-313-ELEC (3532)
Website: www.elec.state.nj.us

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PLEASE PROVIDE THE INFORMATION REQUESTED BELOW

A person, committee or entity subject to, or reasonably believing he, she or it may be subject to, any provision or requirement of the Campaign Reporting Act may request that the Commission provide an advisory opinion pursuant to N.J.S.A. 19:44A-6. Such request must include the following:

1. This request for an Advisory Opinion is being submitted on behalf of:

Full name of Person, Committee, or Entity:

Celebrate New Jersey Now, Inc. (hereafter "CNJN")

Mailing Address:

c/o Genova Burns LLC

*Day Telephone Number:

973-533-0777

494 Broad Street, Newark, New Jersey 07102

*Evening Telephone Number:

973-533-0777

2. Indicate if the above named person, committee, or entity currently files reports with the Commission:

☐ Yes

☒ No

a. If yes, indicate in what capacity it is filing:

Candidate committee

☐

Recall committee

☐

Joint candidates committee

☐

Recall defense committee

☐

Political committee

☐

Personal financial disclosure statement

☐

Continuing political committee

☐

Other (please describe):

☐

Political party committee

☐

Legislative leadership committee

☐

b. If no, indicate if the above named person, committee, or entity has in the past filed reports with the Commission, giving elections (i.e., 2005 general election) or calendar years, and identify filing capacity:

n/a

c. If reports are or were filed under a different name than that appearing in Question #1 above, provide that name:

n/a

3. Please provide below a statement of the cognizable question of law arising under the Campaign Reporting Act, including specific citations to pertinent sections of the Campaign Reporting Act and Commission regulations (if known).

May CNJN accept donations in excess of the \$500 contribution limit set forth in N.J.S.A. 19:44A-18.1 for gubernatorial inaugural fundraising events?

Is CNJN subject to the reporting requirements of N.J.S.A. 19:44A-18.1(c) and N.J.A.C. 19:25-15.59(d) due to its activities in connection with gubernatorial inaugural fundraising events?

May CNJN accept the assistance of individuals associated with the inaugural committee authorized by the Governor-elect in the organization of and fundraising for gubernatorial inaugural fundraising events provided all event proceeds are paid directly to CNJN?

*Leave this field blank if your telephone number is unlisted. Pursuant to N.J.S.A. 47:1A-1.1, an unlisted telephone number is not a public record and must not be provided on this form.

4. Please provide below a full and complete statement of all pertinent facts and contemplated activities that are the subject of the inquiry. Your statement must affirmatively state that the contemplated activities have not already been undertaken by the person, committee, or entity requesting the opinion, and that the person, committee, or entity has standing to seek the opinion, that is the opinion will affect the person's or committee's reporting or other requirements under the Act. Attach additional sheets if necessary.

Statement of Facts:

CNJN is a New Jersey non-profit corporation incorporated pursuant to N.J.S.A. 15A:2-8 and organized as a social-welfare organization under Section 501(c)(4) of the Internal Revenue Code. CNJN wishes to host an event or events during the week preceding the January 16, 2018 inauguration of Governor-elect Phil Murphy and Lieutenant Governor-elect Sheila Oliver, at which the Governor-elect and the Lieutenant Governor-elect will be prominent participants (the "Events"). In accordance with previous Advisory Opinions issued by the New Jersey Election Law Enforcement Commission (the "Commission" or "ELEC"), such as ELEC Advisory Opinion 44-1981 and ELEC Advisory Opinion 10-1993, CNJN wishes to accept donations for the Events in excess of the \$500 contribution limit set forth in N.J.S.A. 19:44A-18.1 for gubernatorial inaugural fundraising events, based on the understanding that: (1) all funds will be deposited directly into the accounts of CNJN; (2) CNJN will not allow any proceeds to be subject to the control of the Governor-elect, the Lieutenant Governor-elect, or Inaugural 2018 Inc., the inaugural committee authorized by the Governor-elect; and (3) no portion of the revenue received from the Events will be used for any political purpose. CNJN intends to open a segregated bank account to receive all donations made in connection with the Events. In addition, CNJN wishes to accept the assistance of certain individuals associated with Inaugural 2018 Inc. to support CNJN's logistical and fundraising efforts in connection with the Events, with the understanding that Inaugural 2018 Inc. will not receive any portion of the proceeds of the Events and will not exercise any control over such proceeds.

5. Please provide below a statement of the result that the person, committee, or entity seeks, and a statement of the reasoning supporting that result:

CNJN seeks an Advisory Opinion that states that, under the provided facts: (1) CNJN is not subject to the \$500 contribution limit set forth in N.J.S.A. 19:44A-18.1 for the Events; (2) CNJN is not subject to Commission reporting requirements, including N.J.S.A. 19:44A-18.1(c) and N.J.A.C. 19:25-15.59(d), due to its activities in connection with the Events; and (3) CNJN may accept the assistance of individuals associated with Inaugural 2018 Inc. in the organization of and fundraising for the Events provided all event proceeds are paid directly to CNJN. Our reasons supporting these results are set forth in the letter we have submitted with this request. We ask, therefore, that the Commission incorporate the enclosed letter as part of this request.

6. Person who is submitting this advisory opinion request on behalf of the committee or entity listed in Question #1:

Full Name:

Rajiv D. Parikh, Esq.

Mailing Address:

Genova Burns LLC

494 Broad Street, Newark, New Jersey 07102

*Day Telephone Number:

973-533-0777

*Evening Telephone Number:

973-533-0777

Fax Number:

973-533-1112

a. Official Capacity of Person Requesting Opinion:

Candidate

☐

Treasurer

☐

Organizational Treasurer

☐

New Jersey Attorney representing requesting person, committee, or entity

☒

Other (please describe):

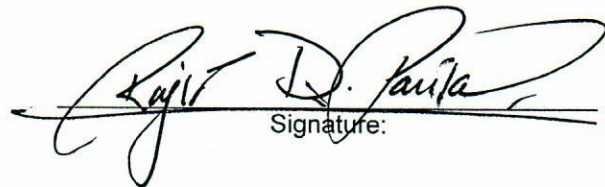
☐

7. I hereby consent to an extension of the 10-day response period provided in N.J.S.A. 19:44A-6f to a 30-day period for Commission response, which period shall start on the date of Commission receipt of the completed advisory opinion request.
(CROSS OUT THIS PARAGRAPH IF CONSENT IS WITHHELD).

8. A request for an advisory opinion will not be considered filed until a fully completed and signed application is received by the Commission.

12/22/2017

Dated:


Signature:

*Leave this field blank if your telephone number is unlisted. Pursuant to N.J.S.A. 47:1A-1.1, an unlisted telephone number is not a public record and must not be provided on this form.



**GENOVA
BURNS**
ATTORNEYS-AT-LAW

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DEC 26 2017

December 22, 2017

VIA OVERNIGHT UPS

New Jersey Election Law Enforcement Commission
25 South Stockton Street
Trenton, New Jersey 08625

Re: Request for Advisory Opinion

Dear Commissioners:

We write on behalf of our client, Celebrate New Jersey Now, Inc. ("CNJN"). CNJN is a New Jersey non-profit corporation incorporated pursuant to *N.J.S.A.* 15A:2-8 and organized as a social-welfare organization under Section 501(c)(4) of the Internal Revenue Code. CNJN wishes to host an event or events during the week preceding the January 16, 2018 inauguration of Governor-elect Phil Murphy and Lieutenant Governor-elect Sheila Oliver, at which the Governor-elect and the Lieutenant Governor-elect will be prominent participants (the "Events"). In accordance with previous Advisory Opinions issued by the New Jersey Election Law Enforcement Commission (the "Commission" or "ELEC"), such as ELEC Advisory Opinion 44-1981 and ELEC Advisory Opinion 10-1993, CNJN wishes to accept donations for the Events in excess of the \$500 contribution limit set forth in *N.J.S.A.* 19:44A-18.1 for gubernatorial inaugural fundraising events, based on the understanding that: (1) all funds will be deposited directly into the accounts of CNJN; (2) CNJN will not allow any proceeds to be subject to the control of the Governor-elect, the Lieutenant Governor-elect, or Inaugural 2018 Inc., the inaugural committee authorized by the Governor-elect; and (3) no portion of the revenue received from the Events will be used for any political purpose. In addition, CNJN wishes to accept the assistance of certain individuals associated with Inaugural 2018 Inc. to support CNJN's logistical and fundraising efforts in connection with the Events, with the understanding that Inaugural 2018 Inc. will not receive any portion of the proceeds of the Events and will not exercise any control over such proceeds. We ask for confirmation that this would be permissible under New Jersey law and the Commission's regulations.

Factual Background

CNJN was formed as a New Jersey non-profit corporation on February 25, 2016 and is dedicated to promoting the common good and general welfare of the people of the State of New Jersey through strengthening the civic engagement of New Jersey's residents and their

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understanding of the electoral process, as well as promoting the business and commerce of the State. To date, CNJN has furthered this mission by engaging in, among other activities, educational activities and non-partisan voter-registration efforts, hosting community education events, provision of educational materials at public events and through an active social-media presence. Since its formation, CNJN has not made any political contributions.

CNJN wishes to host the Events and to accept donations for this purpose in excess of the \$500 contribution limit set forth in *N.J.S.A. 19:44A-18.1* for gubernatorial inaugural fundraising events. In addition, CNJN wishes to receive assistance from certain individuals associated with Inaugural 2018 Inc. for logistical and fundraising support in connection with the Events. To date, CNJN has not organized any activities that could be viewed as gubernatorial inaugural fundraising events. CNJN intends to open a segregated bank account to receive all donations made in connection with the Events (the "Segregated Bank Account") and to deposit all donations received in connection with the Events directly into the Segregated Bank Account. Additionally, CNJN will not allow any proceeds received in connection with the Events to be subject to the control of the Governor-elect, the Lieutenant Governor-elect, or Inaugural 2018 Inc. CNJN will not permit any revenue received from the Events to be used for any political purpose. Last, following the payment of expenses incurred in connection with the Events, any funds remaining in the Segregated Bank Account will be used to directly further the social-welfare objectives of CNJN or will be donated to 501(c)(3) charitable organizations with operations in New Jersey.

Questions Presented

We seek an advisory opinion confirming, on the basis of the facts described above, that:

1. CNJN—a non-profit corporation, exempt from tax under Section 501(c)(4) of the Internal Revenue Code—is not subject to the \$500 contribution limit set forth in *N.J.S.A. 19:44A-18.1* for gubernatorial inaugural fundraising events because CNJN is a non-profit entity; CNJN will deposit all funds directly into the Segregated Bank Account; CNJN will not allow any proceeds to be subject to the control of the Governor-elect, the Lieutenant Governor-elect, or Inaugural 2018 Inc.; and CNJN will not permit any revenue received from the Events to be used for any political purpose.

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2. CNJN as a 501(c)(4) social-welfare organization is not subject to the reporting requirements under the New Jersey Campaign Contributions and Expenditure Reporting Act, *N.J.S.A. 19:44A-1, et seq.* (hereafter “the Act”), and the regulations promulgated thereunder (*N.J.A.C. 19:25-1, et seq.*) due to its activities in connection with the Events, including *N.J.S.A. 19:44A-18.1(c)* and *N.J.A.C. 19:25-15.59(d)*.
3. Individuals associated with Inaugural 2018 Inc. may assist CNJN in the organization of and fundraising for the Events provided all event proceeds are paid directly to CNJN.

Legal Discussion

- I. **As a non-profit social-welfare organization, CNJN should not be subject to the \$500 contribution limit set forth in *N.J.S.A. 19:44A-18.1* when raising funds for the Events.**

New Jersey statute prohibits any person from contributing in excess of \$500, in the aggregate, “for the purpose of any gubernatorial inaugural fund-raising event or events.” *N.J.S.A. 19:44A-18.1(a)*. The events subject to this limitation are those events

[H]eld between the date of the general election for the offices of Governor and Lieutenant Governor and a date 15 days after the date of the inauguration of the Governor and Lieutenant Governor, whether the event is sponsored by the inaugural committee, the State political party committee representing the party of the Governor-elect and Lieutenant Governor-elect, or any other person or persons, and at which the Governor-elect or the Lieutenant Governor-elect is a prominent participant or for which solicitations of contributions include the names of the Governor-elect or Lieutenant Governor-elect in prominent display.

N.J.S.A. 19:44A-18.1(b). However, this definition—and the \$500 contribution limit—does not apply to any event “sponsored by a religious, charitable, benevolent, scientific, artistic or educational nonprofit institution” provided that the following conditions are met:

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- Any proceeds from the event will not be controlled by the Governor-elect or Lieutenant Governor-elect or any political committee or political party committee; and
- The proceeds will not be contributed to the Governor-elect or Lieutenant Governor-elect, the candidacy of the Governor-elect or Lieutenant Governor-elect, a political committee or political party committee.

Id.

The Commission explained the rationale behind this exemption for non-profit institutions when it noted that the declared intention of the Act's contribution limits and the gubernatorial public-financing program is to allow candidates for governor "to conduct their campaigns free from improper influence." ELEC Advisory Opinion 44-1981, *quoting N.J.S.A.19:44A-27*. The Commission for this reason determined that a non-profit charitable organization is not subject to the contribution limits set forth in the Act for gubernatorial fund-raising events precisely because the stated intention of those limits is not fulfilled when all funds are donated directly to a non-profit organization and are not used for any political purpose:

Limiting contributions made to events sponsored by non-profit organizations with no political intent, where the proceeds of such events will not inure to the benefit of the Governor-elect or his candidacy, does not serve the declared public policy of public financing. The danger of improper influence on a successful candidate is minimal where the contributions, in this case the revenues generated from purchasing tickets, will not be applied for any purpose related to his candidacy, or any other political purpose.

ELEC Advisory Opinion 44-1981. Indeed, limiting donations in such a scenario would "unnecessarily limit the fund raising capacity of worthy charitable and social causes." *Id.* It is for these reasons that the Commission advised that the New Jersey Historical Society and Friends of the Newark Museum—both non-profit organizations—and the New Jersey Arts Council, a State body, were permitted to host events featuring the Governor-elect during the week of the gubernatorial inauguration, without reference to the then-current contribution limit of \$250 for all gubernatorial inaugural events. *Id.*

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Here, CNJN is a New Jersey non-profit corporation organized as a social-welfare organization under Section 501(c)(4) of the Internal Revenue Code. As stated above, CNJN wishes to accept donations in excess of \$500 in connection with the Events. Although the Commission has previously advised that non-profit corporations organized as 501(c)(3) charitable organizations are exempt from the \$500 contribution limit set forth in *N.J.S.A. 19:44A-18.1(a)*, to our knowledge the Commission has not directly addressed the applicability of this \$500 limit to non-profit corporations organized as 501(c)(4) social-welfare organizations. The Commission has, however, recognized in the context of gubernatorial inaugural events the importance of supporting not only charitable causes but social causes as well, recognizing the danger of “unnecessarily limit[ing] the fund raising capacity of worthy charitable and social causes” through application of contribution limits. ELEC Advisory Opinion 44-1981.

In this case, CNJN will implement the same precautions and safeguards that the Commission has already approved for 501(c)(3) charitable organizations. CNJN intends to deposit all donations received in connection with the Events directly into the Segregated Bank Account. Also, CNJN will not allow any proceeds received in connection with the Events to be subject to the control of the Governor-elect, the Lieutenant Governor-elect, or Inaugural 2018 Inc. CNJN will not permit any revenue received from the Events to be used for any political purpose. Last, following the payment of expenses incurred in connection with the Events, any funds remaining in the Segregated Bank Account will be used to further the social-welfare objectives of CNJN or will be donated to 501(c)(3) charitable organizations with operations in New Jersey. For these reasons, we respectfully submit that the Commission should recognize that CNJN is not subject, under these facts, to the \$500 contribution limit set forth in *N.J.S.A. 19:44A-18.1(a)* in connection with the Events.

II. As a non-profit social-welfare organization, CNJN should not be subject to the reporting requirements set forth in *N.J.S.A. 19:44A-18.1(c)* and *N.J.A.C. 19:25-15.59* when raising funds or making expenditures in connection with the Events.

The Act imposes certain reporting requirements on any person or committee that sponsors a gubernatorial inaugural fund-raising event. *N.J.S.A. 19:44A-18.1(c)*. In particular, a full report of all contributions and expenditures with respect to the event must be filed with the Commission within 45 days following the event. *Id.* However, the Act does, as noted above, contain an express exception for events sponsored by non-profit organizations provided that funds raised in connection with the inaugural event are not controlled by the Governor-

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elect or by any political committee and are not contributed to the Governor-elect or any political committee. *N.J.S.A.* 19:44A-18.1(b). To our knowledge, non-profit organizations that have previously organized events featuring the Governor-elect during the period surrounding the inaugural have historically been exempt from this filing requirement and, in fact, have not filed a report within 45 days following the event.

In this case, CNJN, as a 501(c)(4) social-welfare organization, should be exempt from the reporting requirements of *N.J.S.A.* 19:44A-18.1(c) and *N.J.A.C.* 19:25-15.59 under the facts set forth above. As previously noted, all proceeds from the Events will be deposited directly into the Segregated Bank Account and will be used solely for the purposes of paying the expenses of the Events, supporting the programmatic social mission of CNJN, or making donations to 501(c)(3) charitable organizations that are active in New Jersey. In this scenario, because the Governor-elect, the Lieutenant Governor-elect and Inaugural 2018, Inc. will not exercise any control over the proceeds of the Events, CNJN should be exempt from the reporting requirements of *N.J.S.A.* 19:44A-18.1(c) and *N.J.A.C.* 19:25-15.59.

III. Individuals associated with Inaugural 2018 Inc. should be permitted to provide logistical and fundraising support to CNJN in connection with the Events provided all proceeds are paid directly to CNJN.

The Commission has previously recognized that an authorized gubernatorial inaugural committee may assist a non-profit charitable organization in “arranging and financing” a fund-raising event that features the Governor-elect provided that all proceeds of the event are paid directly to the non-profit charitable organization. ELEC Advisory Opinion 10-1993. In fact, the Commission has advised that “[n]othing contained in the Act or ELEC regulations limits the involvement of an inaugural event may undertake in assisting a charitable organization in conducting a fund-raising event in which all the proceeds are paid directly to that charitable organization.” *Id.*

Here, CNJN would like to accept the assistance of certain individuals associated with Inaugural 2018 Inc. in organizing and financing the Events, to advance the “fund raising capacity of worthy charitable and social causes.” ELEC Advisory Opinion 44-1981. This assistance would take the form of logistical and fundraising support and would be separate from the organization and operation of Inaugural 2018 Inc.’s own inaugural events planned for January 2018. As discussed above, all proceeds of the Events will be paid directly to CNJN and will be used solely for the purposes of paying the expenses of the Events, supporting the

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programmatic social mission of CNJN, or making donations to 501(c)(3) charitable organizations that are active in New Jersey.

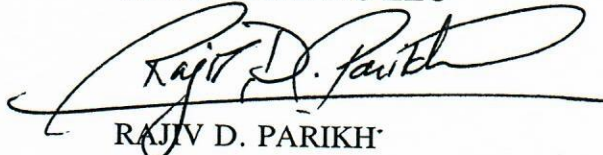
Conclusion

Based on the factual background provided above, we respectfully request that the Commission confirm that CNJN is not subject to the \$500 contribution limit set forth in *N.J.A.C. 19:25-15.59* for gubernatorial inaugural fundraising events; that CNJN is not subject to the reporting obligations of the Act or the regulations promulgated thereunder, including *N.J.S.A. 19:44A-18.1(c)* and *N.J.A.C. 19:25-15.59(d)*, in connection with the Events; and that individuals associated with Inaugural 2018 Inc. may provide logistical and fundraising support to CNJN in connection with the Events provided that all proceeds are paid directly to CNJN.

Thank you for your attention in this matter. Do not hesitate to contact the undersigned should you have any questions or seek any additional information.

Respectfully submitted,

GENOVA BURNS LLC


RAJIV D. PARIKH

On the Letter:

Rebecca Moll Freed, Esq.
Avi D. Kelin, Esq.

RDP/ADK:cp
Enclosure

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