

STATE OF NEW JERSEY
ELECTION LAW ENFORCEMENT
COMMISSION
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January 30, 1978

Nicholas A. Panepinto, Esq.
Messrs. Panepinto & Panepinto
597 Avenue C
Bayonne, New Jersey 07002

Re: The New Jersey Campaign Contributions and Expenditures
Reporting Act, Chapter 83, Laws of 1973 as
Amended and Supplemented ("the Act")
Your Letter Dated November 15, 1977
Opinion #(0-03-78).

Dear Mr. Panepinto:

Your letter dated November 15, 1977 to the New Jersey
Election Law Enforcement Commission ("the Commission"),
including a request for advisory opinion, has been forwarded
to me for reply.

Enclosed please find a copy of a Commission advisory
opinion of last year which deals, in part, with the issue
raised in your opinion request.

In response to your specific question, the Commission
would regard the transfer of funds from the original campaign
account of A,B,C,D,E and F to the new account to support the
various candidates in the ensuing election as a transfer of
such funds for the use of a another committee or candidate.
As discussed in the enclosed, advisory opinion, the Commission
would not challenge such a transfer of funds, although it should
be noted that this issue may be subject to reexamination by the
Commission in the future. It should also be noted that
Commission Regulation 19:25-7.4 promulgated pursuant to the Act
would prohibit the transfer of funds which had been specifically
contributed for the benefit of a particular candidate to a
candidate or committee opposing such particular candidate.
A copy of Regulation 19:25-7.4 is enclosed herewith.

With respect to whether any particular allocation of the
funds of the "Campaign Fund A,B,C,D,E, and F" among other
new political party committees or political clubs would be
proper, the Commission has no jurisdiction and would be unable
to render any opinion.

Yours very truly,



Edward J. Farrell
Legal Counsel

EJF:jj
Enclosure

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N. J. ELECTION
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COMMISSION