



Newsletter

ELECtronic

SEPTEMBER
2020
ISSUE

135

AN ELECTION LAW ENFORCEMENT COMMISSION NEWSLETTER
"Furthering the Interest of an Informed Citizenry"

Comments from the Chairman

Eric H. Jaso

"Politics is the art of looking for trouble, finding it everywhere, diagnosing it incorrectly, and applying the wrong remedies." Sir Ernest John Pickstone Benn

It's that time again. Labor Day weekend of an election year, otherwise known as the "real" start to the campaign season, is upon us.

In addition to enjoying the traditional family barbecue, campaign treasurers should learn about, or refresh their knowledge, of the ins and outs of New Jersey's campaign finance law.

While there is no contest for Governor or Legislature this year, thousands of candidates for municipal and county office will be facing off in November.

Under normal circumstances treasurers would be encouraged to attend ELEC-sponsored training sessions conducted

both in Trenton and off-site at locations throughout the State.

However, in-person training this year is not possible due to the pandemic. Nevertheless, treasurers can avail themselves of two interactive training videos, one dealing with reporting guidelines and the other with forms. In addition, webinar training sessions have been scheduled for the fall.

For information about these training opportunities, treasurers should check out the schedule printed on page three of this newsletter.

In addition, treasurers may access the Compliance manual by keying into the Commission's website at www.elec.nj.gov.

In any event, anyone signing on as a campaign treasurer for the November elections should be aware of the following important information.

First, any candidate raising money must establish a campaign committee bank account. All funds raised must be deposited into the account and all

expenditures must be drawn from the account.

Information about the account is required to be filed with the Commission on a form D-1. Forms are available on the ELEC website.

Throughout the campaign, the treasurer must maintain detailed records of all financial transactions.

Campaigns are required to report their financial activity 29 and 11 days before the election, 20 days after the election and then quarterly until the campaign account is closed.

Candidates and treasurers must be aware of rules as to the proper use of campaign funds. Funds can be used for administrative purposes, contributing to other candidates, and for charity. Funds may be returned to contributors on a pro rata basis, and for an officeholder's ordinary and necessary expenses of holding public office.

Campaign funds cannot be used for a candidate's personal use, including to pay attorney fees and expenses in a criminal matter.

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Executive Director's Thoughts

Jeff Brindle

Not Alone in Thinking Stronger Political Parties Will Improve our Politics

Reprinted from insidernj.com

Since 2010, on websites such as InsiderNJ.com and other places, I have repeatedly expressed my longstanding concern about New Jersey's weakened party system, the impact of McCain/Feingold reforms in undercutting parties and spurring the growth of independent groups, and the potential for parties to play a role in returning civility to politics.

Here are some of my thoughts:

"McCain/Feingold is what started the stampede toward the creation of independent, outside groups; a development that resulted in less transparency and less accountability in the area of campaign finance (2010)."

"In the years between McCain/Feingold and 2010, U.S. Supreme Court decision in *Citizens United v FEC*, independent spending grew over 1,000 percent . . . so in the wake of McCain/Feingold there has been a seismic shift in the electoral landscape. There has been tremendous growth in independent groups along with a rapid decline in transparency (2012)."

"But in truth the demise of the political party system represents the abdication of an important quasi-governmental institution that has proven to be a significant part of our civil society (2019)"

"Despite Americans holding a long and deep skepticism toward political parties, ironically it could be the parties that restore stability to our polarized political environment (2019)."

"The Bipartisan Campaign Reform Act (BCRA) often referred to as McCain/Feingold, was enacted in 2002. Though well meaning, McCain/Feingold sparked the rise in dark money spending and a spate of legal action (2020)."

"Despite the antipathy toward political parties that can be traced to the founding of the Republic, political parties, which help elected officials work together and find common ground, may be just the antidote for these highly partisan and combustible times (2020)."

While these concerns were set forth in my columns throughout the years, numerous others have and are expressing similar concerns in books, academic journals and online posts.

A recent post by Rick Hasen, Professor of Law and Political Science, University of California, discusses an article in the *Election Law Journal* by Richard Pildes, Constitutional Scholar at NYU Law.

Hasen stated, "this article assesses how the rise in contributions from organizations outside of political parties affects the unity or disunity of the party caucus in the Legislature. With highly polarized political parties, party fragmentation makes all the more difficult the building of effective governing coalitions."

In his own post, Pildes writes "for several years now, I have been arguing that political fragmentation within both

parties is a major element in why government in America has become more difficult . . . I have also suggested, along with others, that the rise of outside money—starting with McCain/Feingold law . . . is one of the forces driving the fragmentation within parties."

A more extensive work by Pildes laid the foundation for his recent article and post. As part of the Ralph Gregory lecture at Yale Law School, Pildes previously presented an article published in the 2013-2014 edition of the *Yale Law Journal*. In it he wrote: "If the analysis is correct, stronger parties or parties stronger in certain dimension ironically might be the most effective vehicle for enabling the compromise and deals necessary to enable more effective governance despite partisan divide."

Professors Hasen and Pildes make important points about the connection between parties and good governance and their potential for the amelioration of the polarization in politics. Moreover, they allude to the role played by McCain/Feingold law in spurring the growth of independent groups.

As argued in numerous columns, a stronger party system can indeed help to soften the divisions that exist in our politics today. Disciplined political parties organize majorities in government that are crucial to governing. As long-standing institutions, political parties provide a training ground for leadership by allowing individuals to learn about the relationship between elections and governance, and to gain experience necessary for bringing people together on behalf of the public good.

Political parties also encourage leaders to work together, creating an environment that promotes compromise and establishment of majorities. Unlike independent groups, which often promote single issue politics, parties organize the executive, legislative, and even judicial functions of government, thereby providing a means by which public policies can be enacted.

As Marjorie Randon Hershey writes in her book Party Politics in America . . . “virtually everything important in American politics is rooted in party politics. Political parties are the core of American democracy. . .”

In this spirit, the Election Law Enforcement Commission (ELEC) has made proposals for strengthening political parties including:

1. Removing parties from pay-to-play;
2. Including special interest PACs under pay-to-play law;
3. Disclosure of contributions and expenditures by independent groups making both express advocacy and electioneering communications;
4. Allowing parties to participate in gubernatorial elections; and
5. Increasing contribution limits applicable to parties.

Strengthening parties would bring about more effective government and unity in the public square. Hopefully as life begins to return to normal the Legislature will consider the above proposals for strengthening New Jersey’s party system.

Public Hearing October 20, 2020 11:15 am.

The New Jersey Election Law Enforcement Commission (ELEC) is proposing amendments concerning electronic filing and the statutorily required campaign cost inflation adjustments for Gubernatorial and non-Gubernatorial candidates and committees.

The Commission will hold a hearing to seek public comment about the proposed amendments on **Tuesday, October 20, 2020 at 11:15 a.m.** at:

The Commission invites participation in this hearing and requests that any testimony be limited to no more than ten minutes.

Persons wishing to testify at the October 20, 2020 hearing are asked to reserve time to speak by contacting Administrative Assistant Elbia L. Zeppetelli at (609) 292-8700 no later than October 13, 2020.

Submit written comments by October 21, 2020, to:

Benjamin Kachuriner, Esq.,
Assistant Legal Counsel
Election Law Enforcement Commission
PO Box 185
Trenton, New Jersey 08625-0185
Email: elec.rulemaking@elec.nj.gov

Training and Seminars

Campaign & ELEC efile Training	
September 10, 2020	10am
October 01, 2020	10am

PAC (CPC/PPC) & ELEC eFile Training	
September 15, 2020	10am
October 8, 2020	10am

ELEC eFile (electronic filing only) for R-1 filers	
September 17, 2020	10am

ELEC eFile for R-3 Filers (electronic filing only)	
September 24, 2020	10am

Webinars

Introducing ELEC’s new web-based Electronic File Filing System. Please register for one of the following Webinars.

R-1 WEBINARS		
	9/22/2020	2pm
	10/1/2020	10am
R-3 WEBINARS		
	9/17/2020	10am
	10/8/2020	2pm

After registering, you will receive a confirmation email containing information about joining the webinar.

Should you need assistance, please call (609) 292-8700 or visit https://www.elec.nj.gov/seminar_train/SeminarTraining.html.

After Special Interest PACs Appeared to Hit a Wall Due to Virus Crisis

At the end of the first three months of 2020, special interest political action committees¹ (PACs) registered with the New Jersey Election Law Enforcement Commission (ELEC) had raised what appears to be a record first-quarter haul- \$13.3 million.

But late in the period in mid-March, the COVID-19 virus pandemic arrived with a fury.

Now, new reports show PAC fundraising for the three months ending June 30, 2020 fell \$4.2 million, or 32 percent.

“It appears the virus crisis plagued PAC treasurers in the second quarter just as it seemed to bedevil party and legislative leaders,” said Jeff Brindle, ELEC’s Executive Director.

“This is another sign that the virus crisis is having a noticeable impact on political fund-raising,” said Brindle. “Whether this trend continues remains to be seen. ELEC will be monitoring disclosure reports to track any lingering effects.”

**First and Second Quarter Fund-Raising by
Special Interest Political Action Committees - 2009-2020**

Year	1st Quarter	2 nd Quarter	Difference-\$	Difference-%
2020	\$13,275,856	\$ 9,046,818	\$(4,229,038)	-32%
2019	\$ 9,589,976	\$10,812,530	\$ 1,222,554	13%
2018	\$10,184,082	\$11,768,799	\$ 1,584,717	16%
2017	\$ 9,490,599	\$10,004,801	\$ 514,202	5%
2016	\$ 9,671,583	\$ 8,830,398	\$ (841,185)	-9%
2015	\$ 9,157,344	\$ 9,012,964	\$ (144,380)	-2%
2014	\$ 8,660,510	\$ 9,436,316	\$ 775,806	9%
2013	\$ 8,154,354	\$10,571,899	\$ 2,417,545	30%
2012	\$ 7,082,976	\$ 8,968,890	\$ 1,885,914	27%
2011	\$ 6,316,554	\$ 8,125,744	\$ 1,809,190	29%
2010	\$ 5,436,265	\$ 6,789,976	\$ 1,353,711	25%
2009	\$ 5,728,737	\$ 7,134,164	\$ 1,405,427	25%

ELEC examined fund-raising by 235 special interest PACs that raised or spent funds during the first six months of 2020 and compared their fund-raising to comparable totals dating back to 2009.

Special interest PACs include those run by unions, businesses, regulated industries, ideological, trade associations and professional associations. They do not include party organizations that also report on a quarterly basis.

Going back to 2009, special interest PACs have not suffered a mid-year slump of more than 9 percent, and then only in two (2015 and 2016) of the last 12 years.

On average, first-to-second quarter fundraising by PACs has jumped 15 percent during the decade. This includes average increases of 17 percent during state election years and 13 percent during federal election years.

ELEC had previously disclosed that second quarter fund-raising by county committees fell 50 percent while fund-raising during the same period by the two state parties and four legislative leadership PACs sank 36 percent.

“The latest PAC numbers, combined with previous reports that showed fund-raising slumps by party and legislative committees, suggest fund-raising challenges may lie ahead in the COVID-19 era,” said Brindle.

PACs filing with ELEC are required to detail their fund-raising or spending if they spend more than \$6,300 annually.

Unlike federal Super PACs, which can accept unlimited contributions, most contributions to New Jersey registered PACs are limited to \$7,200 per year. PACs file quarterly reports with ELEC.

¹ Technically, continuing political committees.

County Party Fundraising Down During Recent Quarter When COVID-19 Struck New Jersey Hard

County political parties this year have had their smallest six-month fund-raising haul in 20 years, largely due to a sharp drop-off during the second quarter, according to reports filed with the New Jersey Election Law Enforcement Commission (ELEC).

Through June 30, county parties raised \$1.9 million, less than any half-year period dating back to 2001.

Table 1
Fundraising January Through
June 30 for County Political Parties

YEAR	RAISED	YEAR	RAISED
2001	\$ 5,728,804	2011	\$ 2,617,165
2002	\$ 6,181,702	2012	\$ 2,115,739
2003	\$ 7,932,857	2013	\$ 2,647,728
2004	\$ 6,339,337	2014	\$ 2,379,387
2005	\$ 4,596,354	2015	\$ 2,597,718
2006	\$ 4,354,230	2016	\$ 2,811,365
2007	\$ 5,049,224	2017	\$ 3,585,017
2008	\$ 2,992,406	2018	\$ 2,847,179
2009	\$ 2,829,837	2019	\$ 3,180,991
2010	\$ 2,070,581	2020	\$ 1,955,019

Comparing the first quarter and the second quarter of 2020, fundraising dropped by 50 percent from \$1.3 million to \$648,729. While fundraising also was down between the first two quarters in 2016, it was much smaller- \$69,259, or 4.6 percent. That year was like 2020 because it also followed an election featuring just one house (the state Assembly) up for reelection.

“The COVID-19 pandemic on top of the long-term downward trend in county political party strength has added to the difficulty of party fundraising and it really shows this quarter,” said Jeff Brindle, ELEC’s Executive Director.

Brindle noted that quarter-to-quarter fundraising this year by the so-called Big Six committees- the two state parties and four legislative leadership committees- also suffered, falling 36 percent.

He added, however, that there still are six months left in the year so party committees have time to make up for the sluggish first half of the year. The big fundraising challenge will come next year when there will be an election for governor and both legislative houses.

“Just like society at large, party officials I’m sure are trying to adapt to the COVID-19 era. Their problem is that even before the pandemic struck, parties already were having trouble raising money compared to the 2000s. Fundraising competition from independent special interest groups plus a steep drop in funds from public contractors due to new laws have shrunk county party coffers,” he said.

“Legislative changes, including bipartisan recommendations by ELEC, may be necessary to aid their turnaround,” Brindle said.

“Some independent groups involved in campaigns operate with little or no public scrutiny. By contrast, party committees are more accountable since they fully disclose their campaign finances,” Brindle said.

“If more donors can be enticed to give checks to the parties instead of so-called “dark money” groups, voters would be better off in the long run,” he said. “At least they would know where more money is coming from when we hold our elections.”

While fundraising by county parties as a whole is down 30 percent from 2016, Republican committees saw a bigger drop than Democratic committees. Democrats have spent 9 percent more than in 2016 and had 25 percent more cash in reserve. Republicans have spent less in 2020 than in 2016 and reported smaller cash reserves.

Table 2
Fundraising By County Party Committees
January 1 Through June 30

2020	RAISED	SPENT**	CASH-ON-HAND	NET WORTH*
Democratic County Party Committees	\$1,249,395	\$1,571,818	\$1,609,362	\$1,619,154
Republican County Party Committees	\$ 705,624	\$ 685,878	\$ 494,060	\$ 900,216
Total- Both Parties	\$1,955,019	\$2,257,696	\$2,103,422	\$2,519,370
2016	RAISED	SPENT	CASH-ON-HAND	NET WORTH
Democratic County Party Committees	\$1,596,678	\$1,440,208	\$1,286,379	\$ 973,719
Republican County Party Committees	\$1,214,687	\$ 969,031	\$ 802,228	\$1,689,000
Total- Both Parties	\$2,811,365	\$2,409,239	\$2,088,607	\$2,662,719
Difference 2020 versus 2016	RAISED	SPENT	CASH-ON-HAND	NET WORTH
Democratic County Party Committees	-22%	9%	25%	66%
Republican County Party Committees	-42%	-29%	-38%	-47%
Total- Both Parties	-30%	-6%	1%	-5%

*Net worth is cash-on-hand adjusted for debts owed to or by the committee.

**Some spending totals exceed fundraising totals because committees dipped into reserves or incurred debt.

Six Democratic county party committees- Camden, Gloucester, Mercer, Passaic, Salem, and Union- reported a cash reserve above \$100,000.

Table 3
Campaign Finance Activity of
Democratic County Party Committees
January 1 through June 30, 2020

COUNTY	RAISED	SPENT	CASH-ON-HAND	NET WORTH*
Atlantic	\$ 31,207	\$ 23,402	\$ 16,509	\$ 16,509
Bergen	\$ 227,180	\$ 171,819	\$ 88,496	\$ 88,496
Burlington	\$ 44,300	\$ 26,444	\$ 23,508	\$ 17,133
Camden	\$ 225,342	\$ 446,094	\$ 121,046	\$ 121,046
Cape May	\$ 14,036	\$ 18,115	\$ 134	\$ 134
Cumberland	\$ 48,911	\$ 49,556	\$ 3,757	\$ 3,757
Essex	\$ 134,743	\$ 142,816	\$ 78,267	\$ 78,267
Gloucester	\$ 13,000	\$ 126,748	\$ 435,333	\$ 435,333
Hudson	NA	NA	NA	NA
Hunterdon	\$ 8,385	\$ 10,558	\$ 17,005	\$ 17,005
Mercer	\$ 41,175	\$ 19,397	\$ 219,144	\$ 219,144
Middlesex	\$ 153,668	\$ 193,853	\$ 6,223	\$ 6,223
Monmouth	\$ 68,051	\$ 67,722	\$ 524	\$ 524
Morris	NA	NA	NA	NA
Ocean	\$ 12,209	\$ 9,437	\$ 26,101	\$ 42,268
Passaic	\$ 89,396	\$ 77,325	\$ 298,669	\$ 298,669
Salem*	\$ 0	\$ 1,013	\$ 101,016	\$ 101,016
Somerset	\$ 26,894	\$ 47,368	\$ 40,060	\$ 40,060
Sussex	\$ 4,686	\$ 3,653	\$ 10,479	\$ 10,479
Union	\$ 106,211	\$ 136,498	\$ 123,092	\$ 123,092
Warren**	NA	NA	NA	NA
Democrats-Total	\$1,249,395	\$1,571,818	\$1,609,362	\$1,619,154

*Net worth is cash-on-hand adjusted for debts owed to or by the committee.

NA= Not Available

*First quarter totals

**Does not expect to spend more than \$6,300 this year.

No Republican county party reported a cash reserve larger than \$100,000.

Table 4
Campaign Finance Activity of
Republican County Party Committees
January 1 through June 30, 2020

COUNTY	RAISED	SPENT	CASH-ON-HAND	NET WORTH*
Atlantic	\$ 3,217	\$ 17,310	\$ 7,239	\$ 7,239
Bergen	\$ 77,163	\$ 58,865	\$ 37,023	\$ 27,023
Burlington	\$106,399	\$ 99,939	\$ 26,805	\$466,907
Camden	\$ 12,855	\$ 12,389	\$ 8,470	\$ 8,470
Cape May	NA	NA	NA	NA
Cumberland	\$ 20,426	\$ 12,130	\$ 14,922	\$ 14,922
Essex	\$ 18,500	\$ 1,975	\$ 38,479	\$ 38,479
Gloucester	\$ 63,160	\$ 51,068	\$ 33,810	\$ 33,810
Hudson	NA	NA	NA	NA
Hunterdon	\$ 41,730	\$ 43,666	\$ 1,713	\$ 1,713
Mercer	\$ 2,025	\$ 7,671	\$ 239	\$ 239
Middlesex	\$ 2,800	\$ 2,201	\$ 17,183	\$ 17,183
Monmouth	\$ 62,259	\$ 76,219	\$ 26,018	\$ 23,132
Morris**	\$ 20,959	\$ 18,338	\$ 12,831	\$ 5,231
Ocean	\$ 51,098	\$ 56,059	\$ 11,706	\$ 11,706
Passaic	\$111,395	\$ 78,894	\$ 89,991	\$ 89,991
Salem**	\$ 11,353	\$ 5,757	\$ 38,358	\$ 38,358
Somerset	\$ 35,580	\$ 85,573	\$ 55,928	\$ 42,468
Sussex	\$ 9,520	\$ 11,088	\$ 14,677	\$ 14,677
Union	\$ 36,160	\$ 24,946	\$ 55,419	\$ 55,419
Warren	\$ 19,025	\$ 21,790	\$ 3,249	\$ 3,249
Republicans-Total	\$705,624	\$685,878	\$494,060	\$900,216

*Net worth is cash-on-hand adjusted for debts owed to or by the committee.

NA=Not available.

** Does not expect to spend more than \$6,300 this year.

The numbers in this analysis are based on reports filed by noon August 3, 2020. They have yet to be verified by ELEC staff, and should be considered preliminary.

Individual reports can be reviewed on ELEC's website (www.elec.state.nj.us).

2020 Reporting Dates

Please refer to ELEC's website for up-to-date revised dates

www.elec.nj.gov/pdffiles/reporting_dates/REVISED_2020_Reporting_Dates.pdf

	INCLUSION DATES	REPORT DUE DATE
FIRE COMMISSIONER – FEBRUARY 15, 2020		
29-day Preelection Reporting Date	Inception of campaign* – 1/14/2020	1/17/2020
11-day Preelection Reporting Date	1/15/2020 – 2/1/2020	2/4/2020
20-day Postelection Reporting Date	2/2/2020 – 3/3/2020	3/6/2020
48-Hour Notice Reports Start on 2/2/2020 through 2/15/2020		
APRIL SCHOOL BOARD – May 12, 2020		
29-day Preelection Reporting Date	Inception of campaign* – 4/10/2020	4/13/2020
11-day Preelection Reporting Date	4/11/2020 – 4/28/2020	5/1/2020
20-day Postelection Reporting Date	4/29/2020 – 5/29/2020	6/1/2020
48-Hour Notice Reports Start on 4/29/2020 through 5/12/2020		
MAY MUNICIPAL – MAY 12, 2020		
29-day Preelection Reporting Date	Inception of campaign* – 4/10/2020	4/13/2020
11-day Preelection Reporting Date	4/11/2020 – 4/28/2020	5/1/2020
20-day Postelection Reporting Date	4/29/2020 – 5/29/2020	6/1/2020
48-Hour Notice Reporting Starts on 4/29/2020 through 5/12/2020		
RUNOFF (JUNE) ** – JULY 7, 2020		
29-day Preelection Reporting Date	No Report Required for this Period	
11-day Preelection Reporting Date	4/29/2020 – 6/23/2020	6/26/2020
20-day Postelection Reporting Date	6/24/2020 – 7/24/2020	7/27/2020
48-Hour Notice Reporting Starts on 6/24/2020 through 7/7/2020		
PRIMARY (90-DAY START DATE: MARCH 4, 2020) *** – JULY 7, 2020 (See Executive Order No. 120)		
29-day Preelection Reporting Date	Inception of campaign* – 6/5/2020	6/8/2020
11-day Preelection Reporting Date	6/6/2020 – 6/23/2020	6/26/2020
20-day Postelection Reporting Date	6/24/2020 – 7/24/2020	7/27/2020
48-Hour Notice Reporting Starts on 6/24/2020 through 7/7/2020		
GENERAL (90-DAY START DATE: AUGUST 5, 2020) – NOVEMBER 3, 2020		
29-day Preelection Reporting Date	7/25/2020 – 10/2/2020	10/5/2020
11-day Preelection Reporting Date	10/3/2020 – 10/20/2020	10/23/2020
20-day Postelection Reporting Date	10/21/2020 – 11/20/2020	11/23/2020
48-Hour Notice Reporting Starts on 10/21/2020 through 11/3/2020		
RUNOFF (DECEMBER)** – DECEMBER 8, 2020		
29-day Preelection Reporting Date	No Report Required for this Period	
11-day Preelection Reporting Date	10/21/2020 – 11/24/2020	11/27/2020
20-day Postelection Reporting Date	11/25/2020 – 12/25/2020	12/28/2020
48-Hour Notice Reporting Starts on 11/25/2020 through 12/8/2020		

PACs, PCFRs & CAMPAIGN QUARTERLY FILERS

1 st Quarter	1/1/2020 – 3/31/2020	4/15/2020
2 nd Quarter	4/1/2020 – 6/30/2020	7/15/2020
3 rd Quarter	7/1/2020 – 9/30/2020	10/15/2020
4 th Quarter	10/1/2020 – 12/31/2020	1/15/2021

GOVERNMENTAL AFFAIRS AGENTS (Q-4)

1 st Quarter	1/1/2020 – 3/31/2020	4/13/2020
2 nd Quarter	4/1/2020 – 6/30/2020	7/10/2020
3 rd Quarter	7/1/2020 – 9/30/2020	10/13/2020
4 th Quarter	10/1/2020 – 12/31/2020	1/11/2021

*Inception Date of Campaign (first time filers) or January 1, 2020 (Quarterly filers)

**A candidate committee or joint candidates committee that is filing in a 2020 Runoff election is not required to file a 20-day postelection report for the corresponding prior election (May Municipal or General).

***Form PFD-1 is due on April 9, 2020 for the Primary Election Candidates and July 17, 2020 for the Independent General Election Candidates.

Note: A fourth quarter 2019 filing is needed for the Primary 2020 candidates if they started their campaign prior to December 4, 2019.
A second quarter is needed by Independent/Non-Partisan General Election candidates if they started their campaign prior to May 5, 2020.

HOW TO CONTACT ELEC

www.elec.state.nj.us

In Person: 25 South Stockton Street, 5th Floor, Trenton, NJ
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