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ELEC-Tronic

AN ELECTION LAW ENFORCEMENT COMMISSION NEWSLETTER

"Furthering the Interests of an Informed Citizenry"

Election Law Enforcement Commission, P.O. Box 185, Trenton, NJ 08625
www.elec.state.nj.us (609) 292-8700 - Toll Free Within NJ 1-888-313-ELEC (3532)

Directors:

Jeffrey M. Brindle
 Joseph W. Donohue
 Carol L. Hoekje
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 Linda White
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 Steven M. Dodson
 Shreve Marshall

Comments from the Chairman Ronald DeFilippis

Recently, the Commission published an analytical press release that showed political action committees in 2011 contributing more than \$18 million to New Jersey campaigns.

This number includes \$12.1 million to legislative candidates and leadership committees, almost \$800,000 to the state party committees, \$1.8 million to county parties, and \$3.3 million to local candidates.

The PACs have been increasing their activity since 2006, when New Jersey's pay-to-play law went into effect. Not only have they increased in number but in how much they are spending on New Jersey campaigns.

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In light of this new information, I will devote this column to providing information regarding the disclosure requirements of political action committees, technically termed continuing political committees (CPC) under the New Jersey Campaign Contributions and Expenditures Reporting Act.

For political action committees spending \$4,900 or less during a calendar year, there are three basic requirements.

First, no later than ten days after a PAC, otherwise referred to as a CPC under ELEC regulations, becomes certified by filing a registration statement, it must file a D-4, a designation of treasurer form.

Moreover, on January 15, it must file the Form A-3, which indicates that the PAC does not plan to spend more than \$4,900 in the upcoming year.

Finally, for those PACs not planning to spend more than the threshold amount, yet planning to make contributions, donations in excess of \$300 and currency in any amount must be reported on April 15, July 15, October 15, or January 15, whichever date is applicable.

For PACs exceeding the threshold amount of \$4,900, there are a separate set of rules. In addition to registration and designation of treasurer requirements, these PACs must file detailed reports (Form R-3) on a quarterly basis.

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Comments from the Chairman Ronald DeFilippis

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These detailed reports include donations to the PAC and expenditures made by the PAC, including donations made to candidates, parties, and committees, etc.

All PACs are subject to contribution limitations on donations made to them. The contribution limit is \$7,200 per year. Further, PACs are held to an \$8,200 limit per election on contributions they make to candidates, and to \$7,200, \$25,000, \$37,000, and \$7,200 per year to PACs, state party committees and legislative leadership committees, county party committees, and municipal party committees, respectively.

Regardless of the amount spent per year, all PACs must file a cumulative report 11 days before an election (C-3) of all contributions aggregating in excess of \$1,200 received between the closing date of their last quarterly report and 13 days before the election.

They also are subject to reporting contributions in excess of \$1,200 in the aggregate on a 48-hour basis throughout the date of the election.

Finally, PACs are also to disclose any independent expenditures amounting to more than \$1,200.

In the same way these expenditures can be reported in a cumulative report 11-days before the election or on a 48-hour basis through the day of the election.

For further information, the Commission's regulations, manual, and website should be accessed by all those concerned with meeting the registration and disclosure requirements of PACs, officially referred to as CPC's.

The Commission's Compliance staff is always ready to be helpful as well and can be reached at 1-888-313-ELEC (3532).

Executive Director's Thoughts Jeff Brindle

Campaign finance law can sure be quirky.

In an ironic twist caused by a recent court ruling, independent, non-profit groups that run issue-oriented broadcast ads during federal campaigns now must disclose their contributors and spending if those ads mention the candidate's name. Previously, most such ads could avoid donor disclosure by simply refraining from an explicit appeal for the election or defeat of a candidate.

The ruling is threatening to trigger a stampede into a different loophole. If these same groups expressly advocate for or against a candidate and do so independently, they still can keep their donors secret.

In an odd parsing of the English language, the former type of ad is called electioneering communication, or issue advocacy, while the latter is termed independent expenditures.

In reality, both serve the same purpose: campaign advocacy, though one is subtle, the other direct.

Welcome to the "Alice in Wonderland" world of federal campaign finance regulation.

The situation originally stems from the 2002 Bipartisan Campaign Reform Act (BCRA). Otherwise known as McCain/Feingold, the Act inadvertently spawned the rapid growth of outside groups it set out to limit.

The main way it tried to restrict these groups was to ban them from running issue ads within 30 days of a primary and 60 days of a general election.

But the move to impose "blackout periods" on these ads as a way of limiting the influence of outside groups backfired. The issue ad ban was struck down in 2007 by the U.S. Supreme Court's 5-4 decision in FEC v. Wisconsin Right to Life.

In response, the FEC adopted new regulations that same year resulting in limited disclosure by groups undertaking issue ads.

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Executive Director's Thoughts Jeff Brindle

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In 2011, a Democratic congressman from Maryland filed a new legal challenge entitled Van Hollen v. FEC that contended the 2007 FEC rules ignored McCain/Feingold's mandate for broad disclosure by issue ad groups.

U.S. District Judge Amy Berman Jackson in March agreed and ordered the FEC to write new rules to make them consistent with the law's pro-disclosure edict. A D.C. Circuit Appeals Court panel already has rejected a stay of her ruling.

The FEC published revised rules and, beginning in September, is requiring donors to be disclosed by organizations airing any issue ads about federal candidates.

"This decision is an important step towards fulfilling the Supreme Court's promise in Citizens United that all spending in our elections will be fully disclosed..." said Trevor Potter, president of the Campaign Legal Center, which supported Van Hollen's lawsuit. Citizens United v. FEC was a landmark Supreme Court decision in January 2010 that allowed unlimited independent expenditures by corporations while upholding the legal right to demand broader disclosure of contributors.

The groups affected by the new FEC rules are the 501(c) so-called social welfare organizations and the 527 groups backed by corporations, labor unions, and wealthy individuals. The numbers refer to sections of the IRS code under which the groups are organized.

501(c) groups are permitted to participate in politics as long as their primary activity is not political. 527 groups are not limited in terms of their political involvement.

Until the new FEC rule on issue ads, 501(c) groups did not have to disclose their contributors publicly to anyone, and they reported only some issue ad expenses to FEC. (Reports filed by television networks, which are hard for the public to access, do disclose the cost of many issue ad buys during the campaign.) 527 organizations must report their contributors and expenses twice annually to the IRS.

Now both contributors and expenses related to issue ads have to be reported to the FEC. And it is a good bet that the U.S. Supreme Court will uphold the district judge's decision in Van Hollen as Citizens United came out strongly for disclosure.

However, it is only a stop-gap measure. The groups running issue ads already are changing their tactics to keep hiding their contributors. Already, outside groups on both sides of the political spectrum are planning to circumvent the requirement by planning ads that explicitly support or oppose candidates.

While those groups now will have to report their spending to the FEC, they can keep their donors secret if they spend their money independent of the candidates. At least for now, FEC rules require no disclosure of donors to independent expenditure committees.

By calling for the election or defeat of a candidate, these groups can continue to keep their donors hidden if they spend funds independently of candidates. They will continue to deny the public's legitimate right to know all the interests working to influence the outcome of an election.

For this reason, it is important for Congress to enact legislation that would require full disclosure of financial activity by the 501(c) social welfare groups and the 527 organizations.

Similarly, this kind of action is necessary at the state level as well, including in New Jersey.

With a gubernatorial election as well as a legislative contest in the Garden State next year, it is incumbent upon the Legislature to pass legislation that will require registration and disclosure of contributions and expenditures by independent groups seeking to influence the outcome of the election.

To do so is in the interest of the public, which deserves nothing less than transparency in elections.

NOTE: Following this article, the U.S. Court of Appeals ruled on Tuesday, September 18, 2012, that tax-exempt organizations do not have to disclose their donors.

Special Interest PACs

Special interest political action committees (PACs) in 2011 contributed more than \$18 million to New Jersey campaigns, according to a new analysis by the New Jersey Election Law Enforcement Commission (ELEC).

County parties received another \$1.8 million (10 percent) while state parties reaped \$791,515 (4 percent). Both are active in legislative campaigns. The remainder- \$3.3 million, or 18 percent, went to local candidates and committees other than county parties.

Table 1
Total Contributions Made by Political Action Committees (PACs) in 2011 to New Jersey Candidates and Committees (Excludes Contributions to Federal Candidates)

Recipient	Amount	Percent
Legislative Leadership PACs and Individual Legislators	\$ 12,108,634	67.2%
State Parties	\$ 791,515	4.4%
County Parties	\$ 1,811,525	10.1%
Local (Excluding County Parties)	\$ 3,303,924	18.3%
Total	\$ 18,015,598	100.0%

More than \$33 million was raised solely in 2011 for the legislative election not counting transfers between legislative committees to minimize double-counting. The \$12.1 million in PAC contributions represent 37 percent of that total.

The \$18 million is slightly more than half the estimated \$34.3 million in PAC spending last year in New Jersey. The difference mostly represents contributions to federal or out-of-state campaigns, or to PAC affiliates.

For the first time, ELEC staff analyzed every registered PAC that reported spending during the year- 291 PACs in 2011.

Also in 2011, candidates and committees disclosed another \$1 million from mostly out-of-state PACs that are not registered in New Jersey. Adding this \$1 million to the registered PAC total pushed overall PAC spending to \$34.3 million in 2011.

Table 2
Total Contributions in 2011 by PACs Registered in New Jersey

Year	2006	2007	2008	2009	2010	2011
Total Contributions From Registered PACs	\$28,973,699	\$33,023,400	\$25,422,329	\$35,445,360	\$28,198,556	\$34,313,085*
% Change	0.4%	14.0%	-23.0%	39.4%	-20.4%	18%

*Includes \$1 million from mostly out of state PACs not registered in New Jersey. No comparable figure available for past years.

Continuing a trend, union PACs contributed the largest amount to state and local campaigns- nearly \$10 million, or 55 percent of all special interest PAC contributions made to New Jersey campaigns.

Table 3
PAC Spending in 2011 by Type
Just New Jersey

Type	New Jersey Contributions	Percent
Union	\$ 9,863,162	55%
Professional or Trade Association	\$ 4,262,659	24%
Ideological	\$ 1,777,670	10%
Regulated Industries	\$ 803,042	4%
Other Ongoing Committee	\$ 619,640	3%
Business	\$ 551,244	3%
Civic Association	\$ 138,180	1%
Total	\$ 18,015,598	100%

Unions also dominated overall spending by PACs registered in New Jersey. Several are national PACs that participate in elections in many states. Less than half the \$20.8 million in reported spending by union PACs went to New Jersey non-federal campaigns.

Table 4
PAC Spending in 2011
Overall Spending by Type- Registered PACs

Type	Total Spending	Percent
Union	\$ 20,830,887	63%
Professional or Trade Association	\$ 6,409,947	13%
Ideological	\$ 1,960,465	7%
Regulated Industries	\$ 1,632,330	6%
Other Ongoing Committee	\$ 1,080,967	5%
Business	\$ 1,057,561	3%
Civic Association	\$ 339,354	3%
Total	\$ 33,311,510	100%

To see which parties received the most PAC funds, ELEC analyzed PAC contributions to individual legislators, legislative leadership committees, state parties and county parties- but not local candidates and committees, which are often non-partisan.

The distribution of PAC money by party is shown below:

Table 5
PAC Contributions in 2011 by Party
(Excludes Local Committees)

Party	Amount	Percent
Democrats	\$ 11,468,644	78%
Republicans	\$ 3,193,119	22%

The following chart depicts PAC spending by type and party:

Table 6
PAC Contributions in 2011 by Type and Party
(Excludes Local Committees)

Type	Democrats	Percent	Republicans	Percent
Union	\$ 6,948,997	94%	\$ 444,669	6%
Professional or Trade Association	\$ 2,684,896	63%	\$ 1,574,713	37%
Ideological	\$ 1,166,325	63%	\$ 692,181	37%
Business	\$ 201,385	46%	\$ 232,734	54%
Regulated Industries	\$ 467,041	65%	\$ 248,822	35%
Totals	\$ 11,468,644	78%	\$ 3,193,119	22%

Looking solely at PAC contributions to individual legislators, incumbents took in far more contributions than challengers. This analysis included PAC contributions made during 2011 for both primary and general elections.

Table 7
PAC Contributions in 2011 to Individual
Legislators by Incumbent and Challenger

Incumbent/Challenger?	Amount	Percent
Incumbents	\$ 8,468,856	89%
Challengers	\$ 1,080,907	11%

The top 25 PACs alone spent \$9.7 million in New Jersey- nearly 54 percent of total PAC spending. **(See top 25 PAC contributors 2011, Appendix, Table 11).**

The following charts list the top PAC contributions to the various party committees.

Table 8
Top Ten PAC Contributors in 2011 to New Jersey Candidates and Committees

Name	Type	Total
NJ State Carpenters Non-Partisan Political Education Committee	Union	\$ 1,127,765
NJ State Laborers PAC	Union	\$ 1,015,025
New Jersey Education Association PAC	Union	\$ 808,450
International Brotherhood of Electrical Workers Local #351	Union	\$ 807,945
International Union of Operating Engineers Local 825 Political Action and Education Committee	Union	\$ 459,647
CWA NJ Political Education Committee	Union	\$ 458,040
Leaders Fund	Ideological	\$ 458,000
Realtors PAC	Professional	\$ 450,379
New Jobs (NJ Business and Industry Association) PAC	Ideological	\$ 400,000
Plumbers & Pipefitters Local 9	Union	\$ 319,357

Table 9
Top Ten PAC Contributors in 2011 to New Jersey Legislative Committees

Name	Type	Total
NJ State Laborers PAC	Union	\$ 636,950
NJ State Carpenters Non-Partisan Political Education Committee	Union	\$ 534,550
New Jersey Education Association PAC	Union	\$ 522,350
International Brotherhood of Electrical Workers Local #351	Union	\$ 395,450
Realtors PAC	Professional	\$ 395,350
New Jobs (New Jersey Business and Industry Association) PAC	Ideological	\$ 375,000
CWA NJ Political Education Committee	Union	\$ 321,500
AFSCME Public Employees Organized to Promote Legislative Equality	Union	\$ 266,800
CAR PAC	Trade Association	\$ 262,709
Association for Justice (formerly ATLA)	Professional	\$ 225,870

Table 10
Top PAC Contributors in 2011 to County Party Committees

Name	Type	Total
NJ State Carpenters Non-Partisan Political Education Committee	Union	\$ 345,425
NJ State Laborers PAC	Union	\$ 269,000
International Brotherhood of Electrical Workers Local #351	Union	\$ 202,850
New Jersey Education Association PAC	Union	\$ 187,400
Leaders Fund	Ideological	\$ 131,000
CWA NJ Political Education Committee	Union	\$ 50,000

Technically known in New Jersey as continuing political committees, PACs are required to file detailed reports with ELEC when, during a calendar year, they contribute in excess of \$4,900 to state and/or local candidates. They are required to file reports with ELEC each quarter that list their contributions and expenditures.

For purposes of this analysis, special interest PACs are defined as those that identified themselves as a business, labor union, professional association, ideological group, civic association, trade association, or simply "other." The list also includes PACs formed by employees of regulated industries such as banks and insurance companies, which cannot use corporate funds for campaign contributions.

This press release is a compilation of figures reported to the Commission, and is not intended to express any opinion concerning the accuracy or completeness of any filed report. Although the Commission has taken all reasonable precautions to prevent mathematical or typographical errors, they may occur. Copies of individual PAC reports are available on ELEC's website at www.elec.state.nj.us.

Appendix

Table 11

Top 25 PAC Contributors in 2011 to New Jersey Candidates and Committees

Name	Type	Legislative	State Parties	County Parties	Local	Total
NJ State Carpenters Non-Partisan Political Education Committee	Union	\$ 534,550	\$ 25,000	\$ 345,425	\$ 222,790	\$ 1,127,765
NJ State Laborers PAC	Union	\$ 636,950		\$ 269,000	\$ 109,075	\$ 1,015,025
New Jersey Education Association PAC	Union	\$ 522,350	\$ 25,000	\$ 187,400	\$ 73,700	\$ 808,450
International Brotherhood of Electrical Workers Local #351	Union	\$ 395,450	\$ 20,000	\$ 202,850	\$ 189,645	\$ 807,945
International Union of Operating Engineers Local 825 Political Action and Education Committee	Union	\$ 213,900	\$ 20,000	\$ 23,380	\$ 202,367	\$ 459,647
CWA NJ Political Education Committee	Union	\$ 321,500		\$ 50,000	\$ 86,540	\$ 458,040
Leaders Fund	Ideological	\$ 221,800	\$ 25,000	\$ 131,000	\$ 80,200	\$ 458,000
Realtors PAC	Professional PAC	\$ 395,350	\$ 20,000	\$ 3,000	\$ 32,029	\$ 450,379
New Jobs (NJ Business and Industry Association) PAC	Ideological	\$ 375,000	\$ 25,000			\$ 400,000
Plumbers & Pipefitters Local 9	Union	\$ 155,650	\$ 4,850	\$ 19,148	\$ 139,709	\$ 319,357
Local Union 164 IBEW COPE Fund	Union	\$ 118,900	\$ 25,000	\$ 42,400	\$ 94,772	\$ 281,072
1199/SEIU NY State Political Action Fund	Union	\$ 224,800	\$ 25,000		\$ 29,000	\$ 278,800
AFSCME Public Employees Organized to Promote Legislative Equality	Union	\$ 266,800			\$ 7,500	\$ 274,300
Association for Justice (formerly ATLA)	Professional PAC	\$ 225,870	\$ 40,000			\$ 265,870
CAR PAC	Trade Association	\$ 262,709				\$ 262,709
Developers PAC	Professional PAC	\$ 225,067	\$ 6,000		\$ 29,200	\$ 260,267
Local 322 Committee for Political Education (Plumbers and Pipefitters)	Union	\$ 127,850	\$ 3,000	\$ 49,100	\$ 74,249	\$ 254,199
Verizon Good Government Club of NJ	Regulated Industries	\$ 210,050			\$ 4,700	\$ 214,750
Medical Action Committee	Professional PAC	\$ 205,900			\$ 2,000	\$ 207,900
NJ Funeral Directors PAC	Professional PAC	\$ 207,640				\$ 207,640
NJ Dental PAC	Professional PAC	\$ 167,750	\$ 25,000		\$ 7,050	\$ 199,800
NJAA (Apartment Association)	Trade Association	\$ 148,560	\$ 24,400		\$ 24,400	\$ 197,360
Democratic Republican Independent Voter Education (Teamsters)	Union	\$ 45,500	\$ 10,000	\$ 2,000	\$ 128,763	\$ 186,263
Constructors for Good Government	Trade Association	\$ 103,258	\$ 27,500	\$ 4,600	\$ 6,585	\$ 141,943
JebPAC (Jersey Bankers)	Regulated Industries	\$ 135,075				\$ 135,075

Barbara Counts "Profile"

Associate Data Entry Technician

By Joe Donohue

Barbara Counts has a message for all candidates and treasurers who prepare their campaign finance reports by hand- PLEASE PRINT CLEARLY!

As an Associate Data Entry Technician, Counts has to deal with the consequences of sloppy handwriting on those reports.

It is hard for a disclosure agency like the New Jersey Election Law Enforcement Commission (ELEC) to do its job when candidate reports are illegible.

"You really just have to take your time and try to figure it out," said Counts, an ELEC employee since 1990 and a state worker for more than 30 years.

Before coming to ELEC 22 years ago, Counts was a secretary for several state departments, the last being the Department of Agriculture.

Her affinity for farming came naturally. Even though she grew up in Mercer County, she was born in Georgia, and many relatives remain there.

When she was younger, she often would visit her uncle's hog farm. Among the things she learned- how to quickly de-feather a dead chicken (the secret- dip it in boiling water).

She saw how hogs were slaughtered (and often returned home with fresh pork chops), and learned how to pick blueberries, strawberries, and cotton.

Despite her hands-on farming background, Counts moved over to ELEC and has never had any regrets.

While ELEC employees can't be involved in politics, she likes having a sense of what's going on politically since she has to read and copy huge stacks of candidate and party reports each week. "I enjoy being busy and working," said Counts.

Data entry personnel like Counts are crucial to ELEC's operation.

While data from some reports can be filed electronically, information from thousands of reports still must be hand-entered into the agency's computer system.

One of the main benefits of hand-entering the information is that the public can easily search 850,000 contribution records compiled over more than three decades. Counts has entered her fair share of those records during her time at ELEC.

She admits that after spending the day inputting information, she rarely turns on the computer at home.

Counts has plenty of other pastimes to keep her occupied.

She is a volunteer with the Trenton Area Ministry, and as an usher at the Passion Play and Patriot Theaters. Not surprisingly, she likes attending plays, jazz shows, and gospel shows.

Her main passion ever since she was a child is travel. She has visited 35 states as a national delegate for her church, including places as diverse as Las Vegas, Colorado, and Alaska. She also has toured four European countries.

One of her favorite memories- taking the tram up the sweeping 630-foot Gateway Arch of St. Louis and seeing the Mississippi River and other sites from its observatory.

Counts also got a thrill going to the mountains in California with friends who were skiing, and, only hours later, driving to the coast for some beach-time.

Cruises, however, are her favorite type of trip. She has been to the Caribbean several times, cruised Alaska's inland waterway twice, and even taken a ship from New York to Montreal.

She hopes within a few years to go on a Christmas cruise with all three children and 4 grand-children.

Public Hearings October 16, 2012

1. [Electronic filing of annual reports, and "represented entity" substituted for "lobbyist"](#)

The Commission is proposing amendments concerning electronic filing of annual reports (represented entities and governmental affairs agents, and persons communicating with the general public), and "represented entity" substituted for "lobbyist."

2. [Posting Personal Financial Disclosure Statements on the Commission's website and eliminating the need to file copies](#)

The Commission is proposing amendments concerning posting Personal Financial Disclosure Statements on the Commission's website and eliminating the need to file copies.

The proposed amendments were published in the [New Jersey Register](#) on August 6, 2012, and are currently available on the Commission's website at www.elec.state.nj.us. Copies of the Commission's proposal may also be obtained by calling the Commission at (609) 292-8700.

The Commission will conduct the hearings to elicit public comment concerning the proposals on **Tuesday, October 16, 2012** at 11:15 A.M.

The Commission invites participation in these hearings and requests that any testimony be limited to no more than ten minutes. Persons wishing to testify at the October 16, 2012 hearings are requested to reserve time to speak by contacting Administrative Assistant Elbia L. Zeppetelli at (609) 292-8700 no later than **Tuesday, October 9, 2012**.

Submit written comments by October 16, 2012 to:

Michelle R. Levy, Associate Legal Director
Election Law Enforcement Commission
P. O. Box 185
Trenton, New Jersey 08625-0185

Training Seminars

Please provide the information requested below and return the **entire reservation form** to ELEC. Since space is limited, you must reserve a seat in order to attend. The seminars listed below will be held at the Offices of the Commission, located at 28 West State St., Trenton, NJ. Please select your choice **by circling one of the dates below**:

BUSINESS ENTITY PAY-TO-PLAY TRAINING	
Please contact the Special Programs staff for information at (609) 292-8700. <u>Pay-To-Play Reservation Form*</u>	
November 16, 2012 (full)	10:00 a.m.
TREASURER TRAINING FOR CANDIDATES AND JOINT CANDIDATES COMMITTEES	
<u>Treasurer Training for Candidates Reservation Form**</u>	
October 2, 2012	10:00 a.m.
TREASURER TRAINING FOR POLITICAL PARTY COMMITTEES AND PACS	
<u>Treasurer Training for Political Parties Reservation Form**</u>	
December 12, 2012	10:00 a.m.
R-1 ELECTRONIC FILING SOFTWARE (REFS) TRAINING	
<u>REFS Training Reservation Form**</u>	
October 3, 2012	10:00 a.m.

* You may mail the form back to ELEC, Special Programs Section, P.O. Box 185, Trenton, NJ 08625-0185 or you may fax the form to ELEC at (609) 292-4238. For directions, contact the Special Programs staff.

** You may mail the form back to ELEC, Compliance and Information Section, PO Box 185, Trenton, NJ 08625-0185. Or, you may fax the form to ELEC at (609) 633-9854. For directions, contact the Compliance and Information staff.

REPORTING DATES

ELECTION	48 HOUR START DATE	INCLUSION DATES	FILING DATE
GENERAL ** (90 DAY START DATE: 8/8/12)	10/24/12		11/6/2012
29-day Preelection Reporting Date		6/23/12 - 10/5/12	10/9/2012
11-day Preelection Reporting Date		10/6/12 - 10/23/12	10/26/2012
20-day Postelection Reporting Date		10/24/12 - 11/23/12	11/26/2012
RUNOFF (DECEMBER)*	11/21/12		12/4/2012
29-day Preelection Reporting Date		No Report Required for this Period	
11-day Preelection Reporting Date		10/24/12 - 11/20/12	11/23/2012
20-day Postelection Reporting Date		11/21/12 - 12/21/12	12/24/2012
PACs & CAMPAIGN QUARTERLY FILERS			
3rd Quarter		7/1/12 - 9/30/12	10/15/2012
4th Quarter		10/1/12 - 12/31/12	1/15/2013

* A candidate committee or joint candidates committee that is filing in a 2012 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 12, 2012 for Primary Election Candidates and June 15, 2012 for Independent General Election Candidates.