



ELEC tronic

An Election Law Enforcement Commission Newsletter

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Comments from the Chairman

Eric H. Jaso

GOLFING FOR CAMPAIGN DOLLARS

Little known to the public is the fact that the Campaign Contributions and Expenditures Reporting Act generally prohibits soliciting and/or making political contributions on any public property – not only in public buildings but in schools, parks or even at municipal golf courses.

This law was originally enacted in 2004 as part of a comprehensive ethics reform package, but its scope was expanded in 2012 to cover any public property.

These provisions expanded ELEC’s mandate to police illegal campaign activity beyond State-owned property to any property owned by a municipality, school board, county, fire district, or authority.

The legislature expanded the law in 2012 because teachers and other school employees had been pressured to make political contributions on school property.

The law also prohibits using public property, such as copiers, computers, and telephones, to solicit campaign contributions.

Notwithstanding its broad sweep the law contains an important exception. It reads:

In the event property exclusively owned or leased by the State, or any agency of the State, or by any county, municipality, board of education of a school district, fire district, authority, or other State or local entity, district or instrumentality or part thereof, is made available, through rent, reservation or otherwise, for the exclusive use of any group for a non-governmental purpose as a meeting location, the prohibition in subsection b. of this section shall not apply and the solicitation or making of contributions or funds of any nature from any or among or by the members of the group during the time the group is using the property made available as a meeting location is permitted.

This language resulted in a fair amount of confusion. Therefore, the Commission was asked to clarify the

provision through the issuance of an advisory opinion.

The Advisory Opinion request asked: “whether the prohibition set forth in N.J.S.A. 19:44A-19.1 on making or soliciting campaign contributions on public property categorically prohibits fundraising by a political campaign on public property, or can the exemption set forth in N.J.S.A. 19:44A-19.1d for a meeting for a non-governmental purpose apply.”

The request came from a political organization wishing to hold a fundraising event at a golf course that was owned by a municipality.

In its response, the Commission advised that the exemption does apply in that situation, and that fundraisers are permitted on publicly owned property as long as every group – political or non-political - has the same access, pays the same price, and is otherwise treated equally.

ELEC’s advisory opinion explained that the exemption would allow a campaign fundraiser to be held on public property so long as it was pre-arranged and reserved, with any rental or service fees at fair market value.

“Furthering the Interest of an Informed Citizenry”

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Executive Director's Thoughts

Jeff Brindle

HERE'S HOW A SMALL TAX CREDIT COULD BRING BIGGER DEMOCRACY

Reprinted from observer.com

Sometimes we need to look to the past to help with the present.

Until 1986, individuals making political donations were eligible for a tax credit. The law once provided a credit for half of campaign contributions up to \$50 for a single taxpayer and half of contributions up to \$100 for joint returns.

As part of the 1986 tax reform package, Congress rejected a House proposal to expand the tax credit and instead repealed it. The repeal removed an important incentive for taxpayers to participate in democracy by making small donations.

Much like today, campaign financing was changing 32 years ago.

Nationally, special interest political action committees (PACs) were growing in influence over congressional elections.

In an op-ed column in *The New York Times* on July 30, 1986, Norman J. Ornstein noted that during the previous decade, contributions by special interest political action committees (PACs) had increased from 17 percent to 37 percent of total receipts.

The same trend was taking shape in New Jersey. PACs were becoming a driving force in legislative elections.

The Election Law Enforcement Commission's white paper "Is There a PAC Plague in New Jersey" stated that PACs had grown in number between 1983 and 1987 from 109 to 238.

Between those legislative elections, contributions from PACs increased 87 percent, \$1.5 million to \$2.8 million.

In the column mentioned above, Ornstein expressed concern that ending the tax credit for political donations would lead to more clout for PACs and less for individual contributors.

Ornstein wrote: "Most reformers have focused on the PAC side of the equation... But it will be difficult to alter the balance without... finding ways to encourage individual citizens to get involved in the process and contribute, in small amounts, to campaigns, thereby giving candidates a greater incentive to solicit money from individuals instead of groups and PACs."

He continued, "unfortunately, the tax reform package is in danger of moving in the opposite direction..." Which, in the end, it did.

Information available from the Campaign Finance Institute shows some unusually charismatic candidates have had recent success raising money from small donors, most notably presidential candidates Donald Trump (69 percent) and Bernie Sanders (44 percent). But most candidates raise only a fraction of their war chests through small contributions.

Restoring and perhaps expanding a tax credit would help increase their clout. Especially now that history is repeating itself.

Today, instead of a PAC plague, there is a minefield of independent, often secretive, groups plaguing the electoral landscape.

The onslaught of independent group spending began in earnest following the enactment of the Bipartisan Campaign Reform Act (BCRA) in 2002. Between 2002 and 2008, two years before the United States Supreme Court ruling in *Citizens United*, independent group spending increased by over 1,000 percent.

Following *Citizens United*, spending by anonymous groups exploded.

Just like with PAC spending in the 1980s, the trend in independent group activity, which began nationally, trickled down to the states.

In New Jersey, it has become a dominant force in elections, both at the state level and increasingly at the local level of politics.

For example, between 2005 and 2007 legislative and gubernatorial elections, independent groups spending increased by an astronomical 11,458 percent. In 2005 they spent \$411,224 whereas in 2017 they spent \$47.5 million, 25 percent of total spending.

Increasingly, independent groups are dominating elections in New Jersey, more so than weakened political parties and even the candidates themselves.

The Election Law Enforcement Commission (ELEC) has put forth proposals to offset the influence of secretive groups by strengthening political parties, reforming pay-to-play and requiring registration and disclosure by independent groups.

The proposals include:

PARTIES

1. Removing political parties from pay-to-play;
2. Increasing contribution limits pursuant to parties;
3. Allowing parties to participate in gubernatorial elections;
4. Permitting county parties to give to each other.

PAY-TO-PLAY

1. One state law;
2. Strengthen disclosure;
3. End “fair and open” provision;
4. Increase contribution limit for contractors to \$1,000;
5. Include special interest PACs under pay-to-play;
6. Disclosure of contractor donations to independent groups.

INDEPENDENT GROUPS

1. Registration;
2. Disclosure of contributions and expenditures.

Now is the time to add an additional proposal to the package above: tax credits for political donations to political parties and candidates.

Tax credits for donations to political parties and candidates, combined with the enactment of the proposals highlighted above, would go far toward redirecting the flow of money in New Jersey campaigns away from secretive groups and toward more accountable parties and candidates.

To make matters even better, tax credits would serve as an incentive for citizens to involve themselves in elections through donating to parties and candidates in small amounts.

JEFF BRINDLE MEETS WITH PRINCETON LEAGUE OF WOMEN VOTERS ON ELEC LEGISLATIVE PRIORITIES

By Joseph Donohue

ELEC Executive Director Jeff Brindle spoke to about 40 members of the Princeton League of Women voters on May 21st in the Salt Creek Grille restaurant.

The meeting was arranged by Ingrid Reed, retired director of the New Jersey Project at Rutgers’ Eagleton Institute of Politics and current chairwoman of the governing board of njspotlight.com.

Brindle, who also has previously addressed the state League, said in this time of declining voter turnout, it is more important than ever that groups work to re-engage the electorate.

“The League of Women Voters has always led the way to inform voters of the important choices before them and the importance of voting to a healthy democracy,” Brindle said. “I know you do this very well in Princeton.”

Brindle discussed efforts by ELEC to seek enactment of pending legislative reforms that would expand disclosure requirements for independent special interest groups, streamline state pay-to-play laws and reinvigorate political parties.

“Too many times reform takes place following a scandal. Let’s hope that doesn’t happen and we can achieve our aims through coalition building,” he said.

Brindle said “history and experience” tell him that money is always going to be a part of politics. The challenge is to ensure it is clear to voters who is providing the funds and how the money is being spent.

That is why it makes sense to adopt legislative changes that will try to shift money from special interest groups that are now spending independently of candidates and parties back to parties, which are transparent and subject to regulation.

Independent spending reached nearly \$48 million in state elections in 2017—more than 11,000 percent higher than the 2005 total.

“Try as we might, we can’t get money out of politics. I’m sorry but that’s the truth. We can only redirect the flow of money, not the amount,” Brindle said.

“Certainly, political parties are not a panacea for good government. But in an imperfect world, they are better than the alternative, which leaves independent, secretive groups influencing election outcomes, and therefore government.”

INDEPENDENT SPENDING IN NEW JERSEY IS TOPIC AT MONTANA CAMPAIGN FINANCE CONFERENCE



By Joseph Donohue

A representative of the New Jersey Election Law Enforcement Commission (ELEC) was invited to a national conference in May to discuss record-setting spending by independent special interest groups in the 2017 state elections.

Entitled "Searching for Terra Firma," the three-day conference sponsored by the National Institute on Money in Politics was held at the Flathead Lake Lodge just an hour's drive from Glacier National Park.

It featured several national leaders on campaign finance issues, including Trevor Potter, Founder and President of the Campaign Legal Center and former Federal Election Commission Chairman; Karen Hobart Flynn, President of Common Cause and one of the early champions of public financing in Connecticut elections; Ann Ravel, former Chairwoman of the Federal Election Commission and

California Fair Practices Commission; Michael Malbin, Executive Director of the Campaign Finance Institute and author of several books on campaign finance issues; and Amy Loprest, Executive Director of the New York City Campaign Finance Board.

As deputy executive director at ELEC for the past nine years, I represented ELEC and gave a Power Point presentation about the agency and its recent history.

I served on a panel that included representatives of two similar agencies- Kristin Izumi-Nitao, Executive Director of the Hawaii Campaign Spending Commission, and Shannon Kief, Legal Program Director of the Connecticut State Elections Enforcement Commission.

One of my main points was that it is increasingly difficult to keep voters informed about the involvement of independent special interest groups in New Jersey elections because the state's antiquated law requires little disclosure by these groups.

The gubernatorial and legislative elections in 2005 drew just \$500,000 in independent spending. By the 2017 elections, the total had swollen to \$47.5 million- an increase of 11,458 percent and a new high for state elections.

Most stunning was spending in the third legislative district- about \$18.8 million. With assistance from Ed Bender and Pete Quist at the National Institute on Money in Politics, ELEC determined that this was the most ever spent in a single legislative district in United States history.

It worked out to a cost of \$285 per vote. As a comparison, no gubernatorial candidate in American history has spent more than the \$178.5 million invested by Meg Whitman in her unsuccessful 2010 quest to be California's governor. That represented just \$43.50 per vote.

New Jersey law requires independent committees to disclose only their expenditures and only if they directly advocate the election or defeat of a candidate.

So far, voters have been fortunate that several independent groups taking part in New Jersey elections have voluntarily disclosed both their donors and spending. But that could change any time if the spenders decide to "go dark."

ELEC has worked with legislators from both parties to develop bills that would require registration and disclosure by independent groups and strengthen political parties.

In the state Senate, Senators Troy Singleton (D-7) and Linda Greenstein (D-15) have introduced S-1500, which requires full disclosure by independent groups while raising contribution limits for candidates and parties. The companion bill in the Assembly is A-1524, co-sponsored by Assemblymen Andrew Zwicker (D-16) and Daniel Benson (D-14).

Also, in the state Assembly, Minority Leader Jon Bramnick (R-21) and Assembly members Anthony Bucco (R-25) and Holly Schepisi (R-39) have introduced A-1957, which contains similar provisions. We are hopeful the Legislature will act on these measures this fall.

ELEC LAWYERS OFFER AGENCY OVERVIEW TO PEERS



Two ELEC lawyers on May 31, 2018 presented a Continuing Legal Education (CLE) course on the agency and the laws it enforces as part of the New Jersey Attorney General Advocacy Institute’s CLE series.

Entitled “Lawyers, Lobbyists and Money: Regulating Campaign Financing and Lobbying in New Jersey,” the session took place at the Richard J. Hughes Justice Complex in Trenton. About 70 people were in attendance.

The presentation was made by Ben Kachuriner and Scott Miccio, both Assistant Legal Counsels with the Commission.

The Attorney General Advocacy Institute administers CLEs to address the needs of New Jersey’s public sector attorneys, including deputy attorneys general, prosecutors and other agency attorneys.

The ELEC presentation involved a wide range of topics and provided course attendees, most of whom work in the Attorney General’s office, with a working knowledge of campaign finance law and the specific functions of ELEC.

They touched on the First Amendment implications of campaign finance law, relevant Supreme Court cases and some of the important similarities and differences between federal and New Jersey law.

Additionally, they discussed the importance of disclosure, reporting requirements, lobbying, the gubernatorial public financing program, pay-to-play, ELEC’s history and key cases ELEC has prosecuted in recent years.

This is the first time in 5 years that ELEC has presented as part of the CLE series and initial reviews were positive. Ben and Scott hope to be invited back next year to educate a new crop of government attorneys on ELEC’s legal jurisdiction.

Training Seminars Reminder

For more information, please visit ELEC’s website at www.elec.state.nj.us/.

CAMPAIGN TRAINING SEMINAR	
September 12, 2018	10:00 a.m.
October 2, 2018	10:00 a.m.
PAC (CPC/PPC) TRAINING SEMINAR	
June 14, 2018	10:00 a.m.
September 25, 2018	10:00 a.m.
October 4, 2018	10:00 a.m.
REFS (R-1) ELECTRONIC FILING) TRAINING SEMINAR	
July 19, 2018	10:00 a.m.

COUNTY PARTIES 1ST QUARTER 2018

County political parties emerged from last year’s elections in a slightly better financial position than most recent years, according to quarterly reports filed with the New Jersey Election Law Enforcement Commission (ELEC).

Reports filed by 37 of 42 county parties showed that fundraising and spending totaled about \$1.4 million during the first three months of 2018. Those totals were slightly better than the 14-year average since state pay-to-play laws sharply curtailed contributions by public contractors.

Table 1
First Quarter Campaign Finance
Activity by County Political Parties

	RAISED	SPENT
First Quarter 2018	\$1,371,138	\$1,378,945
Average After Pay to Play Laws- (2005-2018)	\$1,294,348	\$1,367,318
Difference- %	6%	1%
Average Before Pay to Play Laws- (2000-2004)	\$2,561,410	\$2,216,409
Difference- %	-46%	-38%

Jeff Brindle, ELEC’s Executive Director, said while the improvement is welcome, the quarterly totals remain much less than the average before 2005, after which pay-to-play laws and other trends made fundraising more difficult.

“Fundraising is 46 percent less than the average before contractor cash dried up. Spending is down 38 percent. Clearly, county parties still are having problems filling their coffers,” said Brindle.

Brindle said legislation recommended by ELEC could make it easier for state and county parties to raise money while shifting funds away from independent special interest groups that compete for contributions, often operate in the shadows and are now dominating federal, state and even local elections.

“Both parties have introduced bills that would enact ELEC’s suggestions. We hope legislative leaders will take up those bills this fall,” Brindle said.

Compared to four years ago, Democratic county committees fundraising and spending were up while Republican committees were down. Democratic committees also had nearly four times more cash-on-hand.

Table 2
Summary of Campaign Finance Activity by County Committees
January 1 through March 31 - 2018 Versus 2014

	RAISED-2018	SPENT-2018	CASH-ON-HAND-2018	NET WORTH-2014
Democratic County Party Committees	\$ 955,693	\$ 933,191	\$2,107,613	\$1,926,415
Republican County Party Committees	\$ 415,445	\$ 445,753	\$ 549,815	\$1,226,378
Total-Both Parties	\$1,371,138	\$1,378,945	\$2,657,429	\$3,152,793
	RAISED-2014	SPENT-2014	CASH-ON-HAND-2014	NET WORTH-2014*
Democratic County Party Committees	\$ 576,479	\$ 649,320	\$ 838,605	\$ 454,143
Republican County Party Committees	\$ 471,976	\$ 450,015	\$ 474,184	\$1,202,231
Total-Both Parties	\$1,048,455	\$1,099,335	\$1,312,788	\$1,656,374
Difference 2018 versus 2014				
Democratic County Party Committees	66%	44%	151%	324%
Republican County Party Committees	-12%	-1%	16%	2%
Total-Both Parties	31%	25%	102%	90%

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

County parties during the first quarter of 2018 raised and spent the second most funds since 2009 and reported the largest cash reserve since that year.

Table 3
County Party Fundraising and Spending
through First Quarter 2009-2018

YEAR	RAISED	SPENT	CASH-ON-HAND
2009	\$1,338,922	\$1,468,328	\$1,855,920
2010	\$1,023,791	\$1,199,044	\$2,078,378
2011	\$1,088,038	\$1,108,475	\$1,141,821
2012	\$ 891,658	\$ 978,826	\$1,023,935
2013	\$ 957,098	\$ 980,628	\$1,457,253
2014	\$1,048,455	\$1,099,335	\$1,312,788
2015	\$1,080,157	\$1,118,813	\$1,437,520
2016	\$1,499,334	\$ 970,613	\$2,027,203
2017	\$1,195,248	\$1,250,534	\$2,086,933
2018	\$1,371,138	\$1,378,945	\$2,657,429

“County parties seem to be enjoying a slight windfall from last year’s election. With the governor’s seat and the entire Legislature in contention in 2017, they received a large infusion of funds from national party groups. It seems they were able to sock some away for this year,” said Brindle.

Among Democratic county committees that have filed their reports, Bergen, Camden, Gloucester, Mercer, Passaic, and Salem Counties reported cash-on-hand above \$100,000. Burlington and Hudson County reported a negative net worth, meaning they owe more than their total cash reserves.

Table 4
Campaign Finance Activity of Democratic County Party Committees
January 1 through March 31, 2018

COUNTY	RAISED	SPENT	CASH-ON-HAND	NET WORTH*
Atlantic	\$ 28,916	\$ 21,526	\$ 16,765	\$ 16,765
Bergen	\$205,292	\$173,331	\$ 182,543	\$ 141,912
Burlington	\$ 11,786	\$ 22,901	\$ 12,590	\$ (4,998)
Camden	\$137,609	\$ 80,520	\$ 406,093	\$ 406,093
Cape May	\$ 651	\$ 1,556	\$ 621	\$ 621
Cumberland	\$ 8,833	\$ 25,476	\$ 15,824	\$ 15,824
Essex	NA	NA	NA	NA
Gloucester	\$117,898	\$ 43,621	\$ 397,358	\$ 397,358
Hudson	\$ 800	\$ 53,217	\$ 92,407	\$ (46,737)
Hunterdon	\$ 3,555	\$ 9,239	\$ 13,379	\$ 13,379
Mercer	None	\$ 19,296	\$ 104,389	\$ 104,389
Middlesex	\$141,529	\$175,224	\$ 5,869	\$ 5,869
Monmouth	\$ 36,785	\$ 43,021	\$ 2,451	\$ 2,451
Morris	NA	NA	NA	NA
Ocean	\$ 10,155	\$ 19,131	\$ 58,760	\$ 74,926
Passaic	\$128,993	\$ 58,183	\$ 599,113	\$ 599,113
Salem	\$ 486	\$ 4,746	\$ 102,745	\$ 102,745
Somerset	\$ 22,005	\$ 47,230	\$ 13,170	\$ 13,170
Sussex	\$ 5,088	\$ 4,920	\$ 6,494	\$ 6,494
Union	\$ 95,313	\$130,055	\$ 77,043	\$ 77,043
Warren	NA	NA	NA	NA
Democrats-Total	\$955,693	\$933,191	\$2,107,613	\$1,926,415

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

NA= Not Available

Among Republican county committees that have filed their reports, Salem County reported a cash reserve larger than \$100,000. Burlington and Salem Counties reported net worth totals above \$100,000.

Table 5
Campaign Finance Activity of Republican County Party Committees
January 1 through March 31, 2018

COUNTY	RAISED	SPENT	CASH-ON-HAND	NET WORTH*
Atlantic	\$ 5,500	\$ 9,664	\$ 18,286	\$ 18,286
Bergen	\$ 14,460	\$ 12,736	\$ 9,062	\$ 9,062
Burlington	\$144,777	\$166,412	\$ 15,977	\$ 701,666
Camden	\$ 3,999	\$ 3,762	\$ 20,313	\$ 20,313
Cape May	NA	NA	NA	NA
Cumberland	\$ 19,480	\$ 11,967	\$ 22,052	\$ 22,052
Essex	\$ 1,000	NA	\$ 4,247	\$ 4,247
Gloucester	\$ 6,425	\$ 4,796	\$ 9,967	\$ 9,967
Hudson	NA	NA	NA	NA
Hunterdon	\$ 18,915	\$ 20,535	\$ 6,928	\$ 6,928
Mercer	\$ 5,200	\$ 1,980	\$ 24,646	\$ 24,646
Middlesex	\$ 7,260	\$ 8,265	\$ 9,334	\$ 9,334
Monmouth	\$ 16,040	\$ 30,248	\$ 19,562	\$ 19,562
Morris	\$ 63,751	\$ 59,918	\$ 13,957	\$ 5,236
Ocean	\$ 17,600	\$ 15,526	\$ 4,383	\$ 4,383
Passaic	NONE	\$ 4,085	\$ 19,564	\$ 19,564
Salem	\$ 10,126	\$ 13,030	\$220,261	\$ 220,261
Somerset	\$ 30,580	\$ 42,426	\$ 29,988	\$ 29,582
Sussex	\$ 19,675	\$ 24,167	\$ 29,855	\$ 29,855
Union	\$ 19,570	\$ 11,435	\$ 50,817	\$ 50,817
Warren	\$ 11,085	\$ 4,801	\$ 20,617	\$ 20,617
Republicans-Total	\$415,445	\$445,753	\$549,815	\$1,226,378

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

The numbers in this analysis are based on reports filed by noon May 4, 2018. 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).

Reporting Dates

	INCLUSION DATES	REPORT DUE DATE
RUNOFF (JUNE) ** - JUNE 12, 2018		
29-day Preelection Reporting Date	No Report Required for this Period	
11-day Preelection Reporting Date	4/25/2018 - 5/29/2018	6/1/2018
20-day Postelection Reporting Date	5/30/2018 - 6/29/2018	7/2/2018
48-Hour Notice Reporting Starts on 5/30/2018 through 6/12/2018		
PRIMARY (90-DAY START DATE: MARCH 7, 2018)*** - JUNE 5, 2018		
29-day Preelection Reporting Date	Inception of campaign* - 5/4/2018	5/7/2018
11-day Preelection Reporting Date	5/5/2018 - 5/22/2018	5/25/2018
20-day Postelection Reporting Date	5/23/2018 - 6/22/2018	6/25/2018
48-Hour Notice Reporting Starts on 5/23/2018 through 6/5/2018		
GENERAL (90-DAY START DATE: AUGUST 8, 2018)*** - NOVEMBER 6, 2018		
29-day Preelection Reporting Date	6/23/2018 - 10/5/2018	10/9/2018
11-day Preelection Reporting Date	10/6/2018 - 10/23/2018	10/26/2018
20-day Postelection Reporting Date	10/24/2018 - 11/23/2018	11/26/2018
48-Hour Notice Reporting Starts on 10/24/2018 through 11/6/2018		
RUNOFF (DECEMBER)** - DECEMBER 4, 2018		
29-day Preelection Reporting Date	No Report Required for this Period	
11-day Preelection Reporting Date	10/24/2018 - 11/20/2018	11/23/2018
20-day Postelection Reporting Date	11/21/2018 - 12/21/2018	12/24/2018
48-Hour Notice Reporting Starts on 11/21/2018 through 12/4/2018		
PACS, PCFRS & CAMPAIGN QUARTERLY FILERS		
2 nd Quarter	4/1/2018 - 6/30/2018	7/16/2018
3 rd Quarter	7/1/2018 - 9/30/2018	10/15/2018
4 th Quarter	10/1/2018 - 12/31/2018	1/15/2019
GOVERNMENTAL AFFAIRS AGENTS (Q-4)		
2 nd Quarter	4/1/2018 - 6/30/2018	7/10/2018
3 rd Quarter	7/1/2018 - 9/30/2018	10/10/2018
4 th Quarter	10/1/2018 - 12/31/2018	1/10/2019

* Inception Date of Campaign (first time filers) or from January 1, 2018 (Quarterly filers).

** A candidate committee or joint candidates committee that is filing in a 2018 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, 2018 for Primary Election Candidates and June 15, 2018 for Independent General Election Candidates.

Note: A fourth quarter 2017 filing is needed for Primary 2018 candidates if they started their campaign prior to December 7, 2017. A second quarter 2018 filing is needed by Independent/Non-Partisan General Election candidates if they started their campaign prior to May 9, 2018.

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