



ANNUAL REPORT 2025

New Jersey Election Law Enforcement Commission

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www.elec.nj.gov

COMMISSIONERS AND SENIOR STAFF



New Jersey Election Law Enforcement Commission
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Clockwise: Chairman Thomas H. Prol, Commissioner Ryan Peters, Commissioner Jon-Henry Barr, Executive Director Amanda S. Haines, Deputy Director Joseph W. Donohue, Director of Review and Investigation Shreve Marshall, Director of Compliance Aurea Vazquez-Alexander, Deputy Legal Director Scott Miccio, Legal Director Theresa J. Lelinski, Legal Counsel Edwin R. Matthews, and Commissioner Norma R. Evans.



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The essence of Democracy is an informed electorate. It is the fulfillment of this goal that the New Jersey Election Law Enforcement Commission (ELEC) embraces as its valued mission.

Established in 1973, ELEC monitors the campaign financing of all elections in the State. Whether the election is for Governor or Mayor, member of the Legislature or a City Council, candidates and campaign organizations are required to file contribution and expenditure reports with the Commission.

The Commission also administers the law requiring candidates for the Governorship and Legislature to make public their personal finances prior to election day. Moreover, ELEC administers those sections of the law which establish a filing obligation on the part of lobbyists and their clients. ELEC is responsible for enforcing various aspects of the Pay-to-Play law, particularly as it pertains to disclosure.

In addition, the Commission is responsible for administering partial public financing of gubernatorial primary and general elections, for rulemaking, and, as part of its regulatory duties, for holding public hearings. ELEC exercises its enforcement authority, ensuring the integrity of the financial aspects of the State's electoral process.

A major part of New Jersey's system of elections, the Election Law Enforcement Commission has upheld a tradition of fair, but energetic, administration of the State's financial disclosure laws. That tradition is strong today and will remain so in the future.

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THE COMMISSION

THOMAS H. PROL, CHAIRMAN



Thomas H. Prol practices law at Sills Cummis & Gross P.C. in Newark, N.J. He is admitted to practice before the courts of New Jersey and New York and before numerous federal courts. Mr. Prol is a member of the American Bar Association Board of Governors and House of Delegates, a Fellow of the American Bar

Foundation, and a Life Fellow of the National Conference of Bar Presidents. On June 14, 2023, Governor Phil Murphy appointed Mr. Prol as Chair of the New Jersey Election Law Enforcement Commission (ELEC), the state's "fiscal watchdog" agency that oversees election financing integrity in the Garden State.

He was honored as the 2024 New Jersey "Lawyer of the Year," by ALM Media and the New Jersey Law Journal, for his advocacy of LGBTQ rights and his commitment to social justice. Mr. Prol is a past President of the New Jersey State Bar Association ("NJSBA"), serving as NJSBA's first openly gay leader in 2016-2017. Holding Juris Doctorate and Master of Public Health degrees, in March 2020, the NJSBA called him back to service to oversee its Pandemic Task Force, leading the effort to fashion a roadmap to address the impact of the COVID-19 pandemic on the legal profession.

Throughout his legal career, Mr. Prol has been a vocal advocate on issues of equity and access to justice. He co-drafted New Jersey's "Marriage Equality" legislation which revised the State's marriage law to provide equality for all committed couples, regardless of gender, and was signed into law by Governor Murphy on January 10, 2022. As a founding and current executive board member of Garden State Equality Educational Fund, Inc., New Jersey's largest LGBTQ education and advocacy

organization, Mr. Prol has championed marriage equality and civil rights for over two decades. In addition to being named a "Super Lawyer" each year over the past decade, he has stood up and spoken out on civil rights and social justice issues, including advocating for and arguing the defense of the New Jersey Criminal Justice Reform Act and the New Jersey Anti-Bullying Act.

Mr. Prol has appeared and has authored/co-authored numerous briefs over the past two decades before the New Jersey Supreme and Superior Courts, New Jersey Council on Local Mandates, and the U.S. Third Circuit Court of Appeals. He is a lecturer for the N.J. Institute for Continuing Legal Education and Practising Law Institute and is an expert on parliamentary procedure.

Mr. Prol is General Counsel to the Municipal Clerks' Association of New Jersey and Special Environmental Counsel to the Sussex County Municipal Utilities Authority. He previously served as an adjunct professor at Seton Hall University School of Law where he taught Constitutional issues related to gender and sexual orientation, and at New York Law School where he taught legal writing and appellate advocacy. Mr. Prol was Associate General Counsel and Agency Chief Contracting Officer for New York City's Department of Consumer Affairs. Prior to practicing law, Mr. Prol was an environmental scientist and enforcement officer for the U.S. Environmental Protection Agency and served two years as a volunteer in the U.S. Peace Corps in Nepal. Mr. Prol has also held externships with the U.S. Attorney's Office (E.D.N.Y.), the New York City Commission on Human Rights, CNN and The Carter Presidential Center.



THE COMMISSION *(continued)*

RYAN PETERS, COMMISSIONER



Ryan Peters is a native of Mount Laurel, New Jersey. He is a 2004 graduate of the U.S. Naval Academy, a 2012 graduate of the Rutgers School of Law and a graduate of the Johnson College of Business at Cornell University.

Upon successfully finishing training and certification as a Navy SEAL, he completed three combat deployments to Iraq and Afghanistan. At present, Mr. Peters is a Navy Captain assigned to SEAL Team EIGHTEEN.

Mr. Peters is a Vice President with Holman Enterprises in Mount Laurel, New Jersey. Formerly an associate attorney with Pepper Hamilton, LLP, resident in the Philadelphia and Princeton Offices, he concentrated his practice in commercial litigation, with a particular focus on arbitration, breach of contract litigation, and class action litigation. He is also a Certified Fraud Examiner and a Certified Anti-Money Laundering specialist with experience in anti-money laundering compliance and internal investigations.

Mr. Peters is also actively involved in the community. He served as a member of the Burlington County Board of Chosen Freeholders from 2016 until 2018. In January of 2018, Mr. Peters was sworn into the New Jersey Legislature as an Assemblyman representing New Jersey's 8th Legislative District. Mr. Peters also served as the Chairman of the Board of Directors for the Liberty USO of Pennsylvania and Southern New Jersey; the Chairman of the Board of Directors for Goodwill Industries of Southern New Jersey and Philadelphia; and on the Board of Directors for Habitat for Humanity of Burlington and Mercer County.

NORMA R. EVANS, COMMISSIONER



Norma R. Evans received her Juris Doctorate from Temple University Beasley School of Law. While in Law School she was a member of the Moot Court Honor Society and President of the Black Law Students Association.

Ms. Evans earned her B.S. from Towson University.

Ms. Evans began her legal career at the Philadelphia law firm of Montgomery, McCracken, Walker and Rhoads as a Litigation Associate. Following her passion for public service, she became an Assistant Prosecutor with the Camden County Prosecutor's Office. She later joined the Attorney General's Office, Division of Criminal Justice, where she rose to the ranks of Supervising Deputy Attorney General, Deputy Chief of the Office of the Insurance Fraud Prosecutor and Counsel to the Insurance Fraud Prosecutor.

As a Deputy Attorney General, she helped to ensure fair and efficient elections, and assisted county election officials in resolving election day voting-related legal issues, to facilitate the preservation and protection of the right to vote. Her duties included handling any court applications, and providing timely legal advice to County Superintendents of Elections and Boards of Elections on emergent voting-related matters to help ensure the integrity of the voting process.

Over the course of her career, Ms. Evans was assigned to the Sandy Fraud Task Force and represented the Attorney General as legal counsel to the New Jersey Police Training Commission, the State Toxicology Lab and the Human Trafficking Task Force.



THE COMMISSION *(continued)*

NORMA R. EVANS, COMMISSIONER *(continued)*

Recognized for her exceptional contribution to the Division of Criminal Justice and the State of New Jersey, Ms. Evans is the recipient of the Professional Lawyer of the Year Award from the New Jersey State Bar Association's Commission on Professionalism in the Law, the United States Inspector General's Integrity Award, the Division of Criminal Justice Director's Award, and the New Jersey Outstanding Public Official Award.

Ms. Evans is the former President of the Association of Black Women Lawyers of New Jersey. She is a Life Member of Alpha Kappa Alpha Sorority, Inc. Ms. Evans currently serves on the South Jersey Legal Services, Inc. Board of Trustees and is the Vice President of the Garden State Unit of the National Association of Parliamentarians.

JON-HENRY BARR, COMMISSIONER



Jon-Henry "J.H." Barr is a lifelong resident of Union County, New Jersey. He graduated from Lehigh University with a bachelor's degree in government, and he earned his law degree from Seton Hall University School of Law. While in law school, he won a seat on the Clark Township Council at age 23, becoming one of the youngest elected officials in New Jersey at that time. After law school, he was a law clerk to Superior Court Judge Paul F. Chalet in Monmouth County.

In 2001, Mr. Barr was appointed as Chief Municipal Prosecutor for Clark, a position he continues to hold today. He is a founding member of the New Jersey State Municipal Prosecutors' Association, and served as its president for eight years. As a frequent speaker for continuing legal education seminars and for his leadership in the area of municipal court prac-

tice, he received the New Jersey State Bar Association's 2014 Municipal Court Practitioner of the Year award. That same year, due to his extensive experience prosecuting marijuana possession offenses, he joined the steering committee of New Jersey United for Marijuana Reform (NJUMR), a partnership of public safety, medical, civil rights, faith, and social justice groups and individuals. NJUMR played a key role in the overwhelming approval of a November 2020 public referendum in which the citizens of New Jersey voted to legalize the possession of marijuana.

Mr. Barr's community involvement includes membership in the Clark Volunteer Emergency Squad, where he was a certified Emergency Medical Technician from 2003 to 2020, and served twice as the squad's president. For his volunteer service with the Clark squad, the Young Lawyer's Division of the New Jersey State Bar Association rewarded him with its "Service to the Community" trophy in 2005.

In 2017, Mr. Barr was appointed by the Union County Board of County Commissioners to the Board of Education of the Union County Vocational-Technical Schools, becoming the school board's vice-president two years later. He also earned a Certified Board Member recognition in 2023 from the New Jersey School Boards Association, where he currently sits on the Board of Directors as a Delegate for the vocational school boards of the state.

Mr. Barr is admitted to practice law in New Jersey, the District of Columbia, the U.S. Court of Appeals for the Third Circuit, and the United States Supreme Court. He has maintained a private law practice as the managing member of the law firm of Barr & Gulyas, L.L.C. in Clark since 1998. He is also a past president of the Union County Bar Association, which honored him in 2022 with its annual "Pro Bono Attorney of the Year" award.



THE COMMISSION *(continued)*

EDWIN R. MATTHEWS, LEGAL COUNSEL



Edwin R. Matthews was selected to be the Commission's Legal Counsel and began serving in that capacity in November, 2012.

Mr. Matthews is a partner with the Summit, New Jersey law firm of Bourne, Noll & Kenyon. He specializes in the areas of civil litigation,

municipal law, appellate practice, personal injury, products liability, and tax appeals.

Upon graduation from law school, Mr. Matthews served as a Law Clerk for Associate Justice Mark A. Sullivan of the New Jersey State Supreme Court and as an Assistant United States Attorney for the District of New Jersey. He was twice recognized by the United States Attorney General for Sustained Superior Performance. Mr. Matthews has in the past served the Township of South Orange Village, as a member of its governing body, as its Municipal Court Judge, and as its Village Counsel.

Mr. Matthews, a Certified Civil Trial Attorney, is admitted in the State of New Jersey; United States District Courts for the District of New Jersey, the Southern District of New York, and the Eastern District of New York; United States Courts of Appeals for the Third Circuit and Second Circuit; the United States Supreme Court; and the State of New York. He has been designated Mediator for the United States District Court for the District of New Jersey as well as the New Jersey State Court Mediation Program. He has served as an Arbitrator for the Federal Court in New Jersey as well as a number of counties in the state court system. He served as a Member of the Committee on Character, appointed by the New Jersey Supreme Court (1993-2009, 2020 to present) and the Fee Arbitration Committee (2019 to 2023).

His membership in a number of bar associations includes serving as a member of the Board of Trustees of the Trial Attorneys of New Jersey since 1986 and as its President from 2004 to 2005.

Mr. Matthews has lectured frequently at seminars on trial tactics, product liability, the Rules of Procedure and the Rules of Evidence. He is a Master of the Worrall F. Mountain Inn of Court and has been an adjunct faculty member of the School of Law and a Master of the Inn of Court at Seton Hall University School of Law.

Mr. Matthews served in the United States Marine Corps where he attained the rank of Captain. He was awarded the Bronze Star Medal with Combat V, Navy Commendation Medal with Combat V, two Purple Heart Medals, Combat Action Ribbon, and the New Jersey Distinguished Service Medal for service in Vietnam. Mr. Matthews has been recognized as a New Jersey Super Lawyer in the editions for 2009 through 2025. The New Jersey Commission on Professionalism presented him with its Professionalism Award in 2010.

Mr. Matthews received a B.A. degree from the College of the Holy Cross and J.D. degree from Seton Hall University School of Law.



IN A YEAR OF UNPRECEDENTED CAMPAIGN SPENDING AND ACTIVITY, ELEC SUCCESSFULLY CARRIED OUT ITS FISCAL WATCHDOG RESPONSIBILITIES

Calendar year 2025 was extraordinarily busy for the New Jersey Election Law Enforcement Commission (ELEC). The Commission fulfilled its core statutory mission of overseeing campaign finance disclosure and administering public financing while enforcing the New Jersey Campaign Contributions and Expenditures Reporting Act and regulating lobbying activity to ensure transparency, public access, and dialogue in Garden State elections.

ELEC's Annual Reports to the Legislature and Governor over the last three years have detailed the Agency's transformative implementation of the 2023 statutory reforms under the Elections Transparency Act (ETA), P.L. 2023 c. 30. In that time, ELEC Commissioners and staff have undertaken an aggressive effort to champion ELEC's mission through data-informed compliance assistance and education. This included a significant expansion of the Agency's compliance alerts and targeted trainings with an eye toward repurposing minor misunderstandings of law as educational opportunities, where permissible.

That is not to say, however, that ELEC restrains itself in fulfilling its pinnacle role as the Garden State's fiscal watchdog for elections. As detailed herein, we continue to address the regulated community with both education and enforcement, mindful that ELEC's role in ensuring fair and effective financing oversight is critical to Garden State election integrity.

In 2025, a record 40,520 disclosure reports were filed with ELEC, and we endeavored to make them available on ELEC's website for the public to view within hours of receipt. The expedited posting of reports was intended to provide immediate transparency to ensure voters, media members, policy makers, and others so they all could be informed in real-time about who was funding the elections and how funds were being spent. This unparalleled level of disclosure was made possible by the implementation of expedited processing protocols at ELEC as well as the ETA reforms that ensured rapid review and reporting of significantly

more campaign finance activity. We also ensured compliance with the ETA mandate that independent expenditure committees' activities are done in the open, not in the shadows. In that spirit, we respectfully offer suggestions for additional reforms at the end of this Annual Report.

ELEC's implementation of its statutory mandates this year came against the backdrop of the most expensive election year in Garden State history. The 2025 gubernatorial election shattered all prior spending records, becoming the costliest gubernatorial election in state history and the sixth most expensive in U.S. history in inflation-adjusted terms. Combined spending by candidates and independent expenditure groups for both the primary and general elections exceeded \$259 million.

A critical role of the Commission is oversight of the distribution of \$63.4 million in public matching funds under New Jersey's Gubernatorial Public Financing Program. Through the Program, New Jersey residents and the legislature provided 2-to-1 match funding for qualifying private donations, giving \$2 in public funds for every \$1 raised, up to a \$12.5M cap for the 2025 general election after raising \$580,000 to qualify.



ELEC chairman Thomas H. Prol with the Agency's fiscal watchdog, Sparky



CHAIRMAN'S MESSAGE - 2025 ANNUAL REPORT

IN A YEAR OF UNPRECEDENTED CAMPAIGN SPENDING AND ACTIVITY, ELEC SUCCESSFULLY CARRIED OUT ITS FISCAL WATCHDOG RESPONSIBILITIES *(continued)*

After thorough review of candidates' submissions, ELEC distributed public funds totaling \$38,360,556 in the primary election and \$25,000,000 in the general election. Eight candidates qualified for public funds in the primary election, the largest number of candidates since 1989, and two candidates qualified in the general election. That was a stunning record for the Garden State's Public Financing Program, which has been in place since the 1977 gubernatorial election. The matching figure reflects an approximately 55 percent increase over the previous inflation adjusted high set in 2001, likely attributable to 2025 seeing the largest number of qualifying primary candidates since 1989. Such broad participation in the program reinforces the viability of public financing in gubernatorial elections.

ELEC staff worked diligently under compressed timeframes, carefully monitoring the Public Financing Program to ensure fiscal integrity and fairness and ensuring timely payments to candidates throughout the campaign season. This year of such unusual scope created several "all-hands-on-deck" situations and ELEC staff often volunteered for additional duties, working evenings and weekends to ensure that the public had access to campaign finance information as quickly as possible. The Commissioners commend their commitment to the Agency's mission.

To receive these matching funds, candidates agreed to abide by spending limits and participate in mandatory primary and general gubernatorial election debates. Indeed, a special feature of a gubernatorial election year is that, under the Gubernatorial Public Financing Program, the Commission evaluates and selects sponsors through a competitive procurement process for several candidate debates. I want to thank fellow Commissioners Norma R. Evans, Ryan Peters, and Jon-Henry Barr for their work on our selection of the final sponsors. They embraced ELEC's mission with vigor to advance this important aspect of implementation and fulfillment of the Agency's function.

In 2025, independent expenditure-only filers outspent the candidates themselves, a first in New Jersey gubernatorial history. The Democratic Governors Association contributed \$21.9 million to the Greater Garden State super PAC supporting candidate, now-Governor Mikie Sherrill, while the Republican Governors Association contributed \$12.4 million to the Restore New Jersey committee backing candidate Jack Ciattarelli. Media dominated general election outlays, with cable and network television advertising accounting for nearly \$57 million.

At the same time, the Commission's disclosure infrastructure and its implementation of the ETA proved essential to ensuring voter protection measures were observed so that the electorate had access to timely, accurate information throughout the election cycle. Four primary and three general election debates were held during the 2025 election. The Commissioners again would like to extend our appreciation to the lead sponsors of those debates - NJ PBS, NJ Globe, WPIX-TV (PIX11), and WABC-TV - and their partners for the tremendous commitment of time and money that made the debates a success. The sponsors' excellent questioning, professional diligence, and facility resources amplified meticulously developed and implemented debate programs that were unique and robust. Most importantly, the debates served to inform and educate New Jersey voters on a wide variety of current topical issues. And they generated several memorable lines and memes that are now firmly established in Garden State political lore.

It cannot and will not go without my noting ELEC's gratitude to federal and state law enforcement personnel and first responders, including the New Jersey State Police and candidate executive protection details, who ensured the safety and well-being of our candidates and their families, hosts, and public attendees during the debates.



IN A YEAR OF UNPRECEDENTED CAMPAIGN SPENDING AND ACTIVITY, ELEC SUCCESSFULLY CARRIED OUT ITS FISCAL WATCHDOG RESPONSIBILITIES *(continued)*

We successfully resisted a challenge to the general election candidates' mandatory debate implementation, achieving a favorable ruling from the New Jersey Superior Court, Appellate Division, which found that ELEC had lawfully and properly implemented the mandatory general election debates between both major party candidates for governor and lieutenant governor.

As was stated at several ELEC meetings following somber moments of silence and reflection, the political violence that has disrupted our democratic institutions in recent years is unacceptable and must end. With my fellow ELEC Commissioners and staff, I call on everyone to engage in civil, respectful dialogue and treatment of others, no matter how deeply rooted or passionate your ideological views may be. These differences are our strength as we pass political discourse through the crucible of democratic participation and that process must be respected for all. Against that backdrop, ELEC recently promulgated a new regulatory scheme to reinforce that the security and protection of candidates and elected officials are paramount concerns to the Agency. We have now affirmed that candidates may utilize campaign funds for security and protection, as more specifically stated at N.J.A.C. 19:25-6.11.

Lastly, to every candidate who had the courage to be vulnerable and seek elective office, we say "thank you." On behalf of my fellow Commissioners and the ELEC staff, we express our sincere gratitude to Governor Phil Murphy and First Lady Tammy Murphy for their service and steadfast devotion to the people of New Jersey over the past 8 years. We also congratulate Governor Mikie Sherrill, Lieutenant Governor Doctor Dale G. Caldwell, and all the successful candidates in the legislative and local offices around New Jersey.

We also thank the state's legal and finance professionals who work tirelessly to help candidates, campaigns, and lobbyists comply with our laws and regulations. We look forward to working with each of you in maintaining the Garden State's leading role in election integrity and ensuring voters continue to be informed and educated on issues of importance to New Jerseyans.



MESSAGE FROM THE EXECUTIVE DIRECTOR

AMANDA S. HAINES, EXECUTIVE DIRECTOR



Amanda S. Haines,
Executive Director

2025 was a record-breaking year in campaign finance. A gubernatorial election to replace a term-limited governor combined with New Jersey's status as one of only two states – the other being Virginia – electing a governor in 2025, set the stage for national attention. In addition, every seat in the General Assembly and one Senate seat were on the bal-

lot this year, as well as local and county-wide races throughout New Jersey. Spending was projected to reach incredibly high levels, and the reality was even greater than anticipated.

ELEC's mission is an informed electorate. Faced with record funds raised and spent in 2025, ELEC staff excelled while fulfilling this mission. In 2025, ELEC continued to accomplish its goal of disclosing campaign finance and lobbying reports by 7 P.M. on filing days. In addition, for the first time in the history of the Commission, ELEC coded and released 24-hour notices of contributions and expenditures to the ELEC website on Saturday and Sunday immediately prior to the primary and general elections. This essential information, which detailed contributors and payees for transactions immediately prior to the election, was available to the public faster than ever before.

In an effort to further inform the public, this year ELEC began posting advisory opinion requests on its website prior to consideration by the Commission. By doing so, ELEC has enabled the public to be more aware of legal issues faced by regulated entities. This, in turn, creates more opportunities for interested parties to be heard regarding important issues within ELEC's jurisdiction.

ELEC also distributed 124 analytical and advisory press releases to provide context to key campaign numbers and to make candidates, treasurers and the public aware of reporting deadlines, distributions of public funds and other program-related developments.

The changes implemented in the Elections Transparency Act, P.L. 2023, c. 30, were central to the 2025 elections. For the first time in a gubernatorial election, independent expenditure committees were required to register with ELEC and disclose contributors in excess of \$7,500 and all independent expenditures in an election. According to reports filed with ELEC, spending by independent expenditure-only filers, exceeded \$74 million in the primary election and \$82 million in the general election. Prior to the implementation of independent expenditure committee reporting requirements, the independent spending and the sources of funding would not have been publicly available on this scale.

In addition to ensuring that meaningful campaign finance data was available for public inspection as quickly as possible, ELEC also increased its efforts to educate the regulated community through a Compliance and Enforcement Initiative. The Compliance Division launched a robust educational operation, with the goal of helping candidates and treasurers understand the ever-evolving campaign finance statutes and regulations. As a part of the initiative, and for the first time in the history of ELEC, the Commission prospectively announced a random audit of 2025 primary election candidates. The public announcement was designed to encourage greater voluntary compliance in advance of the election.

While the nation watched New Jersey in 2025, New Jersey also viewed national events. Unfortunately, many places throughout the United States experienced instances of political violence in 2025. Understanding the importance of security, the Legislature, during the budget reconciliation process, indicated that expenditures for personal security of publicly-financed gubernatorial candidates would not be

MESSAGE FROM THE EXECUTIVE DIRECTOR (continued)



subject to expenditure limits. Seeing national trends and understanding the gravity of the current political climate, ELEC not only amended its regulations to reflect the Legislature's changes, but also adopted a rule clarifying that campaign funds may be used by non-gubernatorial candidates and officeholders for security expenses, subject to reporting and record-keeping requirements.

On the horizon for 2026 is the two-year cost index adjustment of limits and thresholds for non-gubernatorial candidates, including contribution limits. This will be the first adjustment involving only non-gubernatorial candidates and committees, as directed by the Elections Transparency Act. The new limits and thresholds will be effective for 2027 and 2028. In 2028, ELEC will once again adjust gubernatorial and non-gubernatorial thresholds and limits, which will be effective in 2029 and 2030.

As the campaign finance landscape continues to evolve, the Commission remains steadfast in its commitment to the timely disclosure of required data, the promotion of voluntary compliance through comprehensive educational outreach, and the administration of fair, effective, and expeditious enforcement proceedings. The Commission further anticipates continued collaboration with the Legislature, the regulated community, and other relevant stakeholders to ensure that we can continue to deliver on our mission.



LEGISLATIVE REVIEW AND RECOMMENDATIONS

THE ELECTIONS TRANSPARENCY ACT WAS TIMELY



*Joseph W. Donohue,
Deputy Director*

During the first 50 years of ELEC’s existence, candidates, parties, political committees and continuing political committees were all required to disclose their political donors.

One group was not - independent spenders.

These are individuals or fund-raising committees that, by law, do not coordinate

their activities with candidates or parties.

The enactment of the Elections Transparency Act in April 2023 required independent groups to disclose donors who gave more than \$7,500. This provision fulfilled a long-time Commission recommendation. The timing turned out to be ideal.

The 2025 gubernatorial election cost at least \$259 million. It was the most expensive election in state history and one of the top ten most expensive gubernatorial races in US history.

Independent spending in the election dwarfed past totals.

In 2025, the total was almost \$158 million - a 278 percent increase over 2021. The previous high was nearly \$42 million in the 2021 election.

In another first for a New Jersey gubernatorial election, independent spenders outspent candidates. The margin was 61 percent to 39 percent.

YEAR	AMOUNT (IN MILLIONS)	% OF TOTAL SPENDING
2025	\$157.8	61%
2021	\$ 41.7	46%
2017	\$ 24.5	31%
2013	\$ 21.3	44%
2009	\$ 14.0	20%
2005	\$ 0.4	0.5%
2001	\$ 6.7	14%

For half of the five decades since ELEC’s creation in 1973, disclosure by independent spenders was not a big issue since there was little independent spending in earlier New Jersey elections.

It first drew legislative attention in 2001 after four potential gubernatorial candidates spent \$5 million promoting themselves in the years before the election.

The candidates mostly used issue advocacy non-profit groups that at the time were allowed to hide their contributors and were criticized as “stealth PACs”. The term was a prelude to today’s “dark money” label for groups that spend anonymously.

In January 2001, the shadowy spending strategy led to enactment of P.L. 2001, c.20. It denied eligibility for public funding to gubernatorial candidates who managed issue advocacy groups within four years of their candidacies unless they disclosed all contributions and expenditures involving those groups.

As a result, more than \$25 million has been disclosed over 24 years that might otherwise have remained “dark money”.

Compared to the 2001 gubernatorial election, independent spending in the 2025 gubernatorial election was almost 24 times higher.

LEGISLATIVE REVIEW AND RECOMMENDATIONS (continued)



Because the Elections Transparency Act was already in place before 2025, the overwhelming majority of funds raised and spent by independent expenditure-only filers can be viewed in reports filed with ELEC.

One reason for the new law's success was the creation of independent expenditure committees (IECs)¹ that were required to list major donors and all independent expenditures in reports filed before and after an election. Of the \$157 million spent on the 2025 governor's election, 93 percent flowed through 39 IECs. Most of their funds came from other IECs.

The Elections Transparency Act exempts from disclosure contributions of \$7,500 or less to IECs. Contributions at or below this threshold must be reported as lump sums in reports filed with ELEC.

In 2025, about \$2.6 million received by IECs fell under this threshold.

An additional \$2.1 million in contributions reported by IECs came from 501c4 social welfare organizations that do not normally disclose their contributions.

Despite these two exceptions, about 97% of funds contributed to IECs came from sources that also disclosed their donors, either through ELEC, the FEC, or the IRS. Despite the unprecedented scope of spending in the election, the new law ensured a high level of disclosure.

Notwithstanding the increased disclosure, independent expenditure reporting requirements can be improved.

IECs are not required to file 72/24 notices² with ELEC in the final 13 days of an election. Candidates, parties and continuing political committees do file such notices.

Absent this requirement, millions of dollars in pre-election contributions and expenditures during 2025 were not required to be disclosed until the IECs filed their 20-day postelection reports.

During the 2025 primary election, about \$2.7 million - four percent - of all contributions occurred during the 13 days prior to the election.

A much bigger sum of general election contributions - \$18.5 million, or 22.5 percent - would have been reported preelection if IECs were required to file 72/24-hour notices.

The loss of preelection disclosure of expenditures also was significant.

In the primary, \$7.8 million, or nine percent, of pre-election transactions occurred in the 13 days prior to the election. During the general, \$23.4 million, or 31 percent, of expenses occurred during the same time period.

Some IECs voluntarily disclosed contributions and/or expenditures during the final 13 days of the elections. While laudable, this voluntary disclosure highlights the need for such disclosure by all IECs.

ELEC makes the following legislative recommendations to amend the Campaign Act and other statutes within the Commission's jurisdiction.

¹ Independent spenders also can organize as continuing political committees or file forms IND that list only expenditures.

² Candidates and committees must file the notices with ELEC within 72 hours starting on the 13th day prior to the election, and within 24 hours starting on the 7th day before the election.



LEGISLATIVE REVIEW AND RECOMMENDATIONS (continued)

RECOMMENDATIONS

Recommendation #1 – Resolve the conflict between the redaction requirements of Daniel’s Law and the disclosure requirements of the Campaign Act by removing certain address reporting requirements.

The Commission recognizes and supports the intent of Daniel’s Law to protect the personal safety and privacy of certain individuals. However, there is an inherent conflict between the address redaction requirements of Daniel’s Law and the address disclosure requirements of the Campaign Act. The conflict places ELEC in the position of either violating the directives in the Campaign Act or violating the directives of Daniel’s Law. To resolve this conflict, ELEC recommended in past years that the Legislature exempt ELEC filings from the redaction requirements of Daniel’s Law.

After careful consideration, ELEC has concluded that the conflict between Daniel’s Law and the Campaign Act should instead be resolved by amending the Campaign Act to remove certain address reporting requirements.

Most statutes within ELEC’s jurisdiction require the reporting and disclosure of mailing addresses for contributors, expenditure payees and individuals associated with reporting committees. The reports, including the addresses, are available on the Commission’s website. Daniel’s Law requires the redaction of addresses of “covered” individuals.

The Commission emphasizes nearly immediate disclosure of filed information. An expedited timeline greatly benefits New Jersey voters, however, Daniel’s Law redactions cannot be performed in real time due to the volume of addresses currently required to be reported.

To effectuate compliance with Daniel’s Law, ELEC recommends the removal of the following address reporting requirements:

- Contributor address
- Payee address
- Treasurer/Chairperson address
- Candidate address

The Commission further recommends that the Campaign Act continue to require reporting entities to collect and maintain records of such addresses for the statutory retention period. This would ensure that addresses are available for audit by the Commission. Contributors, payees, candidates, treasurers and chairpersons, including individuals identified as “covered persons” under Daniel’s Law, would still be identified on reports, however, that identification would not include an address. All other information would still be subject to disclosure, including occupation and employer information for individual contributors.

Once enacted, these legislative changes would apply to individuals registering in the Daniel’s Law database, on a prospective basis. For individuals who have registered in the Daniel’s Law database prior to these legislative changes, the Commission would continue to work to manually redact addresses in paper and electronic reports, as required by Daniel’s Law.



RECOMMENDATIONS

Recommendation #2 – Refine Independent Expenditure Committee (IEC) disclosure requirements.

1. Require 72/24-hour notice reporting by IECs of contributions in excess of \$7,500 and independent expenditures in excess of \$300 in the final 13 days prior to an election. The addition of this requirement would provide preelection disclosure of preelection transactions that would otherwise be reported for the first time on the 20-day postelection report.

2. Require IECs to file postelection quarterly reports. All other election-related committees are required to file quarterly reports until all remaining obligations are paid. At that point, such committees certify that their accounts are finalized. Currently, IEC reporting concludes with a 20-day postelection report and there is no requirement to report the reconciliation of any outstanding obligations. Continued reporting would increase transparency as to the sources of funding for independent expenditures and would only conclude when all activity concerning the current election has been wound up.

3. Increase the lookback period for IEC reporting. Under current law, an IEC that makes an election-eering communication must disclose appropriate transactions from the first day of the prior calendar year up to the close of the first reporting period (either the 29-day report or the 11-day report, depending on the election). January 1 of the calendar year prior to the election may not be sufficient to capture all relevant activity for an IEC that organizes more than a year prior to an election. ELEC recommends an extension of the lookback period to the first day of the calendar year prior to the date the entity organized as an IEC for the election.

4. Clarify that when an IEC participates in the general election immediately after participating in the primary election, the IEC may begin general election reporting with the first transaction following the close of the 20-day postelection report for the primary election, instead of the January 1 lookback. This clarification will avoid duplicate reporting in the general election of transactions reported for the primary election.



STATUTORY HISTORY OF ELEC

LAW	CREATED/ESTABLISHED	EFFECTIVE DATE
Election Law Enforcement Commission	P.L. 1973, c.83 (N.J.S.A. 19:44A-1 et seq.) "The New Jersey Campaign Contributions and Expenditures Reporting Act" Signed by Governor William Cahill	April 24, 1973
Gubernatorial Public Financing Program	P.L. 1974, c.26 (N.J.S.A. 19:44A-27 et seq.) Signed by Governor Brendan Byrne	May 6, 1974
Gubernatorial Public Financing Program Extending to Primary Elections	P.L. 1980, c.74 (N.J.S.A. 19:44A-3 et seq.) Signed by Governor Brendan Byrne	July 23, 1980
Personal Financial Disclosure Program	P.L. 1981, c.129 (N.J.S.A. 19:44B-1 et seq.) Signed by Governor Brendan Byrne	May 1, 1981
Lobbying Program	P.L. 1981, c.150 (N.J.S.A. 52:13C-18 et seq.) Signed by Governor Brendan Byrne	May 22, 1981
Continuing Political Committee Quarterly Reporting	P.L. 1983, c.579 (amendments to N.J.S.A. 19:44A-1 et seq.) Signed by Governor Thomas Kean	January 17, 1984
Gubernatorial Campaign Contributions & Expenditures - amendments	P.L. 1989, c.4 (amendments to N.J.S.A. 19:44A-3 et al) Signed by Governor Thomas Kean	January 21, 1989
Lobbying Reform	P.L. 1991, c.243 (amendments to N.J.S.A. 52:13C-18 et seq.) Signed by Governor James Florio	January 1, 1992
Campaign Finance Reform	P.L. 1993, c.65 (amendments to N.J.S.A. 19:44A-1 et seq.) Signed by Governor James Florio	April 7, 1993
Street Money Reform Law	P.L. 1993, c.370, (codified as N.J.S.A. 19:44A-11.7) Signed by Governor James Florio	January 7, 1994
Uniform Recall Election Law	P.L. 1995, c.105, (codified as N.J.S.A. 19:27A-1 et seq.) Signed by Governor Christine Whitman	May 17, 1995
Political Identification Law	P.L. 1995, c.391, (codified as N.J.S.A. 19:44A-22.2 and 22.3) Signed by Governor Christine Whitman	February 1, 1996
Non-Profit Disclosure by Gubernatorial Candidates	P.L. 2001, c.20, (codified as N.J.S.A. 19:44A-27 et seq.) Denies eligibility for public financing to gubernatorial candidates who oversaw a 527 or 501(c) non-profit group within four years of their candidacies unless the candidate discloses contributions and expenditures by those committees. Signed by Governor Christine Whitman	January 30, 2001
Contribution Limit Changes	P.L. 2001, c.384 (amendments to N.J.S.A. 19:44A-1 et seq.) Signed by Governor Donald DiFrancesco	January 8, 2002
Campaign Financing Reform Initiatives	P.L. 2004, c.19, 21, 22, 28, 29, 30, 31, 32, 33, 123 (amendments to N.J.S.A. 19:44A-1 et seq.) Signed by Governor James McGreevey Signed by Governor Richard Codey	June 16, 2004 through January 1, 2006

STATUTORY HISTORY OF ELEC

(continued)



LAW	CREATED/ESTABLISHED	EFFECTIVE DATE
2005 Clean Elections Pilot Project	P.L. 2004, c.121 Signed by Governor James McGreevey	August 11, 2004
Lobbying Law Expansion	P.L. 2003, c.255 and P.L. 2004, c20, 27, 34, 36, 37, and 38 (amendments to N.J.S.A. 52:13C-18 et seq.) Signed by Governor James McGreevey	April 13 through August 16, 2004
Pay-to-Play Contracting Reform	(amendments to N.J.S.A. 19:44A-1 et seq.) P.L. 2004, c.19 (codified as N.J.S.A. 19:44A-20.3 - 20.12) Signed by Governor James McGreevey P.L. 2005, c.51 (codified as N.J.S.A. 19:44A-20.13 - 20.25) Signed by Governor Richard Codey P.L. 2005, c.271 (codified as N.J.S.A. 19:44A-20.26 - 20.27) Signed by Governor Richard Codey	January 1, 2006 October 15, 2004 January 1, 2006 January 5, 2006
2007 Clean Elections Pilot Project	P.L. 2007, c.60 Signed by Governor Jon Corzine	March 28, 2007
Office of Lieutenant Governor	P.L. 2009, c.66 Signed by Governor Jon Corzine	June 26, 2009
Solicitation Ban on Public Property	P.L. 2011 c.204 Signed by Governor Chris Christie	January 17, 2012
Eliminates the Requirement of Candidates to File Duplicate Copies of Campaign Treasurer's Reports with County Clerks	P.L. 2014, c.58 and N.J.A.C. 19:25-8.12 Signed by Governor Chris Christie	January 1, 2015
Requires Governmental Affairs Agents to Disclose Compensation Received from State or Local Government Entities	P.L. 2017, c.49 and N.J.A.C. 52:13C-21 Signed by Governor Chris Christie	May 1, 2017
Requires Gubernatorial Ballot Statements to be Posted Online	P.L. 2017, c.177 and N.J.A.C. 19:44A-37 Signed by Governor Chris Christie	July 21, 2017
Elections Transparency Act	P.L. 2023, c.30 Signed by Governor Philip Murphy	April 3, 2023



COMPLIANCE DIVISION

In 2025, New Jersey voters had access to more campaign finance information, faster and more transparently than at any time in the State's history. The Compliance Division's work resulted in the review, verification and public disclosure of more than \$63 million in public funds and tens of thousands of campaign finance reports, ensuring transparency about who financed campaigns and how those funds were spent.

OVERVIEW

The Compliance Division played a central role in ensuring transparency, accountability, and timely public disclosure during the 2025 election year. The year was defined by one of the most complex gubernatorial election cycles in New Jersey's history, unprecedented levels of public financing activity, significantly increased filing volume, and heightened public and media demand for immediate access to campaign finance information. Throughout 2025, the Compliance Division successfully met these challenges while advancing modernization initiatives and reinforcing public trust in the State's electoral process.

A GUBERNATORIAL ELECTION OF UNPRECEDENTED SCALE AND COMPLEXITY

The 2025 gubernatorial election cycle presented substantially greater operational demands than the prior gubernatorial election in 2021. Both the Primary and General Elections involved a significantly larger and more active field of candidates, more frequent reporting obligations, and heightened public scrutiny. Eight candidates participated in the Primary Election and two candidates advanced to the General Election, compared to only two candidates in each phase during the 2021 cycle.

The Democratic primary featured a competitive field including Ras Baraka, Steven Fulop, Josh Gottheimer, Mikie Sherrill and Sean Spiller. The Republican primary included Jack Ciattarelli, Bill Spadea, and Jon Bramnick. The general election included Mikie Sherrill and Jack Ciattarelli.

This expanded field resulted in markedly higher volumes of campaign finance submissions, eligibility reviews, amendments, and compliance correspondence. Unlike the 2021 cycle, which followed more predictable reporting patterns, the 2025 cycle required sustained engagement across extended pre-election periods and continuous coordination with campaigns, committees, and internal ELEC units.

ADMINISTRATION OF THE GUBERNATORIAL PUBLIC FINANCING PROGRAM

The Gubernatorial Public Financing Program required an exceptional level of Compliance oversight in 2025. During the Primary Election phase, the Commission disbursed approximately \$38.36 million in public matching funds. For the General Election, an additional \$25 million in public funds was disbursed, with both general election candidates reaching the statutory maximum public financing limit.

Combined Primary and General Election disbursements totaled approximately \$63.33 million, the largest amount of public funds ever distributed in the history of New Jersey's Gubernatorial Public Financing Program. By comparison, total public financing disbursements during the 2021 gubernatorial election were approximately \$29.7 million, reflecting an increase of roughly 113 percent. The 2025 Gubernatorial election cycle also presented the highest volume of individual contributions and an unprecedented increase in the number of digital and credit card contributions compared to all previous gubernatorial cycles. In 2025, contributions made to qualified candidates in the primary election totaled 41,952 as compared to 7,756 in 2021. Contributions made to qualified candidates in the 2025 general election totaled 32,450 as compared to 17,407 in 2021.

Compliance staff verified matchable contributions, reviewed expenditures, issued Quality Control letters, and coordinated with Finance, IT, and Executive staff.

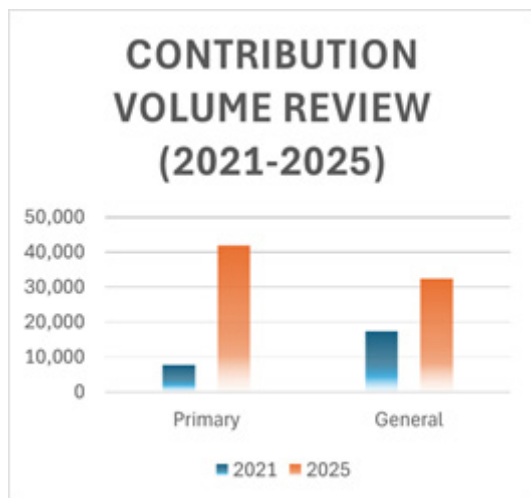


COMPLIANCE DIVISION
(continued)

GUBERNATORIAL CONTRIBUTION VOLUME INCREASE

Compliance also saw a substantial increase in contribution review volume compared to 2021. During the primary election period, contributions reviewed increased from 7,756 in 2021 to 41,952 in 2025 - a **441% increase**. General election contributions also rose from 17,407 in 2021 to 32,450 in 2025, reflecting an **86% increase**. Overall, combined primary and general contribution volume increased from 25,163 to 74,402, representing an overall increase of approximately 196%. This dramatic escalation in volume underscores the unprecedented scale of financial activity and the expanded workload managed by the Compliance Division during the 2025 gubernatorial cycle.

ELECTION	2021	2025
Primary	7,756	41,952
General	17,407	32,450



GUBERNATORIAL SUBMISSION VOLUME – 2021 VS 2025

Candidate submissions were also at unprecedented levels during the 2025 submission cycle. Primary election submissions increased from 12 filings in 2021 to 85 filings in 2025, a 608% increase. General

election submissions remained relatively consistent, with 26 filings in 2021 compared to 24 filings in 2025, representing a slight 7.7% decrease. The sharp rise in primary filings, coupled with the surge in contribution volume, significantly expanded compliance review demands and processing requirements during the 2025 gubernatorial cycle.

ELECTION	2021 SUBMISSIONS	2025 SUBMISSIONS	% CHANGE
Primary	12	85	608.30%
General	26	24	-7.70%

GUBERNATORIAL DEBATES AND HISTORIC CAMPAIGN SPENDING

The 2025 gubernatorial election cycle featured a statewide series of primary and general election debates hosted by major broadcast partners and academic institutions throughout New Jersey. Debate programming was carried by various local and regional media partners, ensuring broad public access and transparency.

Debates were held across North and Central, New Jersey, to reflect the State’s regional diversity. Venues included university campuses and broadcast studios in Newark, Lawrenceville, New Brunswick and Union. This geographic rotation enhanced civic engagement and reinforced the Commission’s commitment to statewide voter access and public disclosure. The debates drew extensive viewership across state and national media outlets.

Financial activity during the 2025 gubernatorial cycle reached unprecedented levels. As of October 21, approximately \$228 million had been spent across the primary and general elections, the highest total in New Jersey history. This figure substantially exceeded prior gubernatorial cycles, including those marked by significant candidate self-funding.



COMPLIANCE DIVISION (continued)

Under New Jersey's public financing system, participating candidates agreed to strict reporting requirements and spending caps of \$8.7 million for the primary and \$18.6 million for the general election. However, independent expenditure groups and super PACs accounted for a significant portion of total spending, highlighting the evolving landscape of campaign finance oversight.

The Compliance Division maintained heightened monitoring, reporting review, and public disclosure operations throughout the cycle to ensure all statutory reporting obligations were met in a timely and transparent manner.

TECHNOLOGY INNOVATION AND DATA INTEGRITY ENHANCEMENTS

During the 2025 gubernatorial election cycle, the Compliance Division implemented enhanced data analytics techniques to identify potential reporting anomalies, duplicate transactions, and contribution-limit exceedances in real time.

Given the unprecedented filing volume and record-setting financial activity, traditional manual review methods were supplemented with internally developed data validation tools.

The Division leveraged structured database queries, spreadsheet automation, data analytical tools and emerging technologies to enhance internal review efficiency.

REAL-TIME DISCLOSURE AND EXPANDED OPERATIONAL COVERAGE

A major accomplishment of 2025 was the Compliance Division's ability, for the first time, to disclose campaign finance reports in real time over an election weekend. During critical pre-election periods, staff worked evenings and weekends to review filings as they were received and make them publicly available without delay.

COMPLIANCE AND ENFORCEMENT INITIATIVE (CEI)

On April 8, 2025, the Commission launched a Compliance and Enforcement Initiative designed to improve the timeliness and accuracy of campaign finance reporting across all levels of government. This initiative reflected a proactive approach to compliance, emphasizing education, corrective training, and targeted post-election review.

As part of the initiative, Compliance expanded educational outreach by developing targeted training sessions addressing common reporting deficiencies, producing concise reference materials, and offering interactive compliance workshops and blended learning experiences. These efforts are intended to improve voluntary compliance and strengthen filer understanding of reporting obligations.

The initiative also introduced mandatory, issue-specific training for candidates and treasurers whose reports revealed instances of non-compliance. This approach emphasized improved accuracy and voluntary compliance in lieu of enforcement action.

Following the 2025 Primary Election, the initiative provided for post-election audits of a randomly selected pool of candidates' reports, including candidates in local, county, and legislative races. This review process reinforced accountability and supported consistent enforcement of disclosure requirements.

PILOT PROGRAM FOR ELECTRONIC CORRESPONDENCE

In 2025, the Compliance Division advanced a pilot program to modernize the delivery of compliance correspondence. By expanding electronic delivery of Quality Control letters and notices to participants who consented, the Division improved efficiency, delivery speed, and recordkeeping while reducing reliance on paper mail.

COMPLIANCE DIVISION (continued)



QUALITY CONTROL, OUTREACH, AND COLLABORATION

Compliance staff continued rigorous review of all electronically filed reports, provided extensive training and guidance to filers, and supported public and media inquiries. Close collaboration with Legal, IT, Finance, and Executive leadership ensured continuity of operations and timely public disclosure during the most demanding phases of the election cycle.

LOOKING AHEAD

By the close of 2025, the Compliance Division had successfully navigated an election cycle that exceeded the scale and complexity of the 2021 gubernatorial election. Building on these accomplishments, the Division will continue to expand electronic services, refine review processes, pursue automation and modernize compliance trainings, to meet future election challenges.

BY THE NUMBERS • COMPLIANCE SUPPORT FOR CANDIDATES

ELECTION	# OF CANDIDATES	# OF POLITICAL COMMITTEES
Fire Commissioner	278	1
April Schoolboard	86	12
May Municipal	61	12
Primary	1870	381
General	2181	474
December Runoff	33	6
November Schoolboard	1879	120
TOTAL	6,388	1,006

BY THE NUMBERS • COMPLIANCE REVIEW AND ANALYSIS OF DISCLOSURE REPORTS

REGULATED GROUP	NUMBER	REPORTS FILED
Candidates and Committees	7394	31714
Public Contractors	2188	2419
Lobbyists (Avg)	906	6270
Professional Fundraisers (Avg)	24	117
TOTAL	10,512	40,520

BUSINESS ENTITY DISCLOSURE OF CONTRACTS AND CONTRIBUTIONS FOR 2024 REPORTED IN 2025

2,188 BUSINESS ENTITIES	NUMBER	TOTAL AMOUNT
Reported Contracts	20920	\$17,695,131,590
Reported Contributions	9262	\$11,839,676



LAW DIVISION

LEGAL DIVISION

The Legal Division (Legal) is responsible for preparing advisory opinions and regulations, and interpreting and enforcing the laws under the jurisdiction of the Commission. Complaints, final decisions, advisory opinions, and regulations are posted on the Commission's website to provide the public with timely disclosure of the Commission's enforcement actions and convenient access to legal resources. Legal also advises the Commissioners and staff on various aspects of the Commission's work.

THE 2025 GUBERNATORIAL ELECTION

Legal advised the Commission on a variety of subjects during the 2025 gubernatorial election, including requests for investigations and a complaint filed with the Commission regarding gubernatorial debates. In response to the complaint, the Commission held a hearing and issued a decision and order that was appealed to the Superior Court – Appellate Division on an emergent basis. Legal successfully opposed the emergent appeal, obtaining an order from the Appellate Division denying the request for emergent relief. The appeal was subsequently withdrawn.

ADVISORY OPINIONS

The Commission is statutorily authorized to issue advisory opinions as to whether a specific set of facts would constitute a violation of the New Jersey Campaign Contributions and Expenditures Reporting Act (Campaign Act), N.J.S.A. 19:44A-1 et seq., or whether the proposed circumstances would implicate any of the Act's obligations. In 2025, the Commission issued five advisory opinions addressing the following questions:

- AO No. 01 2025 – Reporting distinctions between political committees, continuing political committees, and independent expenditure committees

- AO No. 02 2025 – Expenditures subject to the N.J.A.C. 19:25-16.9(a)(3) expenditure limit
- AO No. 03 2025 – Contributions from one candidate's campaign account to that same candidate's campaign account for a different office in a different year
- AO No. 04 2025 – Publicly-financed gubernatorial candidate expending personal funds for a personal lawsuit
- AO No. 05 2025 – The use of campaign funds to pay for airfare to attend a conference occurring after an officeholder's term expires

REGULATIONS

In 2025, N.J.S.A. 19:44A-7 was amended to add direct or indirect expenses for physical or virtual security for gubernatorial candidates, their families, and campaign staff as expenses that do not count against gubernatorial public financing expenditure limits. In response to this amendment, as well as increasing concerns among candidates and officeholders about their personal safety and the safety of their families, Legal drafted new rules and amendments to codify the Commission's position on the use of campaign funds for security expenses. N.J.A.C. 19:25-6.11 permits candidates and officeholders to use campaign funds to pay for reasonable costs of security measures, provided that the security measures address ongoing threats or dangers to the candidates or officeholders, or to their immediate family or staff, that would not exist irrespective of their status or duties as a candidate or officeholder, and that the costs are the normal amount for such goods and services. The measures contemplated by N.J.A.C. 19:25-6.11 include structural and non-structural security devices, security personnel, and cybersecurity. N.J.A.C. 19:25-15.26(a)5 and N.J.A.C. 19:25-16.27(a)5 were amended to reflect that security expenses for candidates participating in the gubernatorial public financing program shall not be subject to the expenditure limits of N.J.A.C.



19:25-15.11(a)4 and N.J.A.C. 19:25-16.9(a)3. The new rule and amendments were adopted by the Commission on December 16, 2025 and published in the New Jersey Register on January 20, 2026.

ENFORCEMENT ACTIONS

The Commission is statutorily authorized to issue complaints alleging violations of the New Jersey Campaign Contributions and Expenditures Reporting Act (Campaign Act), N.J.S.A. 19:44A-1, et seq., in addition to the other statutes under the Commission's jurisdiction, and to seek monetary penalties. Legal prosecutes violations of the Campaign Act by issuing complaints, litigating those cases/enforcement actions to resolution and presenting them to the Commission for final decision determination. Enforcement actions are designed to achieve accurate and complete reporting by candidates and committees, and to discourage future violations by imposing appropriate penalties.

COMPLAINTS

Legal issued 164 complaints in 2025 pertaining to calendar years 2023 and 2024, including the primary, municipal and general elections. These complaints either originated as requests for investigations made by members of the public or resulted from internal audits. Violations related to 72/24-hour notices, excessive contributions, and contribution and expenditure reporting by candidates and various committees were alleged.

Upon receipt of a complaint, Respondents have the right to request a hearing and have the matter transmitted to the Office of Administrative Law (OAL), or Respondents may waive their right to a hearing. Legal transmitted one complaint to the OAL in 2025.

FINAL DECISIONS

At the conclusion of each case, the Commission issues a final decision that sets forth findings of fact and conclusions of law specifying violations found and penalties imposed for specific violations. Final decisions issued in 2025 found that candidates and committees violated the Campaign Act and imposed penalties for: (1) failing to file reports and filing late reports; (2) failing to file 72/24 hour notices; (3) receiving excessive contributions; and (4) failing to report and late reporting of contribution and expenditure information. The Commission issued 97 final decisions in 2025. Monetary penalties paid during 2025 totaled \$139,254.36.

CONCLUSION

Interpreting and enforcing the provisions of law are critical elements of effective administration of the campaign and lobbying financial disclosure entrusted to the Commission. Legal continues to meet its challenges in a professional and responsible manner by enforcing the laws fairly and uniformly, and respecting the protections afforded to each Respondent under the law.



REVIEW AND INVESTIGATION DIVISION

The Review and Investigation Division (R&I) consists of a Director of Review and Investigation, six investigators and one support staff.

In calendar year 2025, the Review and Investigation Division closed 45 investigations. The investigations primarily focused on the incomplete or untimely filing of campaign reports, campaign report information such as complete disclosure of contribution and expenditure information, receipt of excessive contributions, and reporting obligations of individuals and/or entities that expended funds independently of the candidate.

REQUESTS FOR INVESTIGATION

Any member of the public can request an investigation by completing the Confidential Request for Investigation form, which can be found on the Commission's website, www.elec.nj.gov. The Requests for Investigation continue to be a major source of information regarding alleged violations of the Reporting Act as many members of the public continue to hold accountable their elected officials. When submitting a request, it is helpful if the complainant provides as much information as possible, such as copies of campaign literature, photographs of campaign signs and any other information that may support the alleged reporting violation. However, these requests cannot be filed by facsimile.

The Commission received a total of 258 Requests for Investigation in calendar year 2025.

The Commission also initiates investigations as a result of staff review of reports filed with the Commission. The Review and Investigation Division opened 51 new investigations in calendar year 2025. The Commission does not release any information to the public indicating how it may have learned of a specific reporting violation or comment as to how an investigation is initiated.

INVESTIGATIONS

In most cases, R&I will issue a subpoena either to entities that are the subject of the investigation or to financial institutions where a designated campaign or organizational depository is established. Subpoenas are issued for the production of documents that are needed to corroborate the financial information that was reported by the candidates or obtain more accurate information to assist the candidates with their filing obligations. In calendar year 2025, the Division issued 117 subpoenas during the course of an investigation and in support of the Legal Division during litigation.

NON-FILER COMPLAINTS

The Review and Investigation Division is also responsible for reviewing the filings of candidates and committees to make referrals for complaints to the Legal Division of those entities that fail to file with the Commission. In 2025, 153 such complaint recommendations were transmitted to the Legal Division.

The Division's investigators also review the Commission's files for records of candidates and entities participating in an election who have failed to file any reports.

ADMINISTRATIVE HEARING AND OTHER LEGAL SUPPORT

R&I also assists the Legal Division with follow-up enforcement activity such as locating addresses for the sheriff's service of complaints and in the preparation of cases for hearings before the Office of Administrative Law. In this instance, the investigator is required to prepare as the State's witness in cases in which the respondents do not waive their right to such hearings. The investigators are also called upon to review amended reports filed by respondents in response to Commission complaints.



OVERVIEW OF THE 2025 GUBERNATORIAL CYCLE

The 2025 gubernatorial election was unprecedented, marked by the highest spending in state history. Nine candidates participated in the Public Financing Program, submitting 85 requests for matching funds during the primary cycle and 24 during the general election.

The Gubernatorial Public Financing Program requires campaigns to provide detailed documentation for every contribution, including checks, deposit slips, and online contribution images. This cycle saw a surge in small online contributions combined with a larger candidate pool, resulting in tens of thousands of contributions and related documentation uploaded to the system.

SYSTEM PERFORMANCE AND CHALLENGES

The extraordinary volume of submissions far exceeded the original system's design capacity. Both the online filing application and the internal submission review program required significant patching to manage the increased workload.

Compared to the 2021 cycle, submitted contributions rose by **233%** (an increase of 150,000), while document images grew by **370%**, surpassing half a million.

REVIEW PROCESS AND OPERATIONAL IMPACT

Approving qualifying contributions involves a rigorous, time-intensive review process, including analysis, potential rejection, and resubmission until verification is complete. Compliance and IT teams worked extended hours, including weekends, to ensure timely completion.

Given current trends, contribution volumes are expected to grow substantially in future cycles. IT and Compliance will review the entire submission process to define design requirements for upgrading the system, incorporating functionality to enable faster and more reliable reviews.

MAJOR IT INITIATIVES

NJOIT .NET PLATFORM MIGRATION

IT successfully completed the final phase of NJOIT's .NET Platform migration from Windows Server 2012 to 2022. This multi-year project encompassed several major ELEC applications, including Short Forms, PTP, AGAA, QGAA, and ELEC Webservices.

ELEC operates under tight maintenance windows due to year-round filing deadlines. With the advent of online filing, ELEC functions as a 24/7/365 operation, requiring meticulous planning to coordinate system updates without disrupting service.

CLOUD INTEGRATION AND AZURE MIGRATION

ELEC has consistently embraced emerging technologies. In 2018, when the State permitted agencies to acquire cloud services, ELEC secured its own Azure tenant. At that time, many departments could not leverage this technology because NJOIT had not yet established its Azure tenant within the State's network for secure data transmission.

In 2012, ELEC implemented a closed web service combining network-level restrictions with application-level security, enabling safe data transfer from its homegrown PC-based filing application through the State's multi-tier security architecture.

Now that NJOIT has established its Azure environment, ELEC must migrate its filing applications from its own Azure tenant to the State's cloud platform. This migration is scheduled for completion by the end of 2026.



INFORMATION TECHNOLOGY DIVISION (IT) (continued)

DATABASE TRANSITION TO ORACLE EXADATA

ELEC has historically relied on an Oracle server on its premises to store, manage, and retrieve data from filed reports and internal applications. Oracle provides a secure, high-performance database architecture with high availability. However, Governor Christie's 2017 Executive Order 225 initiated the centralization of the State's IT infrastructure, prohibiting agencies from purchasing new servers.

ELEC's Oracle server has reached end-of-life. IT is currently conducting a proof of concept on NJOIT's Oracle Exadata platform to assess feasibility. Exadata is Oracle's flagship solution for mission-critical enterprise databases. If approved, this transition is planned for 2027.

DATA ENTRY OPERATIONS

Data Entry has been in transition for several years. With electronic uploads now standard, physical data entry is minimal. However, staff responsibilities include:

- Reviewing duplicate contributions from short form filers, often caused by redundant entries from small committees.
- Entering candidate names received from county clerks for various elections.
- Maintaining self-service Registration and PIN applications used for electronic report signing.



State of New Jersey
New Jersey Election Law Enforcement Commission

Governor Phil Murphy - Lt. Governor Tahesha Way

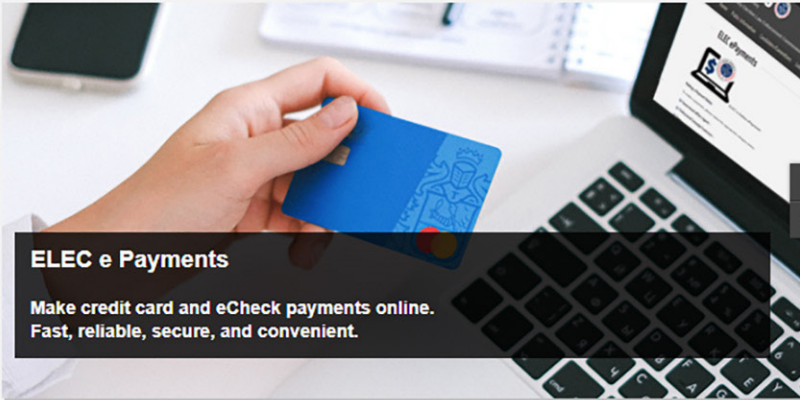
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Advice for Filers

- Forms (Electronic Filing)
- Candidates/Election Committees
- Committees (CPC, PPC & LLC)
- ELEC ePayments
- Gubernatorial Public Finance Program
- Professional Fundraisers
- Pay-to-Play
- Treasurer Training
- Lobbying
- FAQs Candidates



ELEC e Payments

Make credit card and eCheck payments online.
Fast, reliable, secure, and convenient.

Where To Find

Filers	Contributions and Expenditures	Candidate or Committee Reports	Lobbying Reports
Press Releases	Pay-to-Play Reports	Complaints and Final Decisions	Newsletter, White Papers and Other Publications

Press Releases

- Special Meeting Agenda
March 21 2025
- Lobbying Annual Reports
March 20 2025
- Lobbying Spending Trends
March 19 2025

Spotlight On

- ELEC-Tronic Newsletter Issue 182
March 2025
- 2025 Cost Index Report >
- 2023 Annual Report >
- White Paper 31: Legislative Election 2021 - The Southern Tsunami >
- The History of the Commission Project - Volume 13 - Dr. Susan

Contribution Limits

View contribution limits for candidates, parties, political committees and PACs >

Disclosure Dates

Pending report disclosure dates >

How do I...?

- Electronically file my reports?
 - Candidates and Committees
 - Lobbyists
 - Public Contractors
 - Gubernatorial Candidates
- Request an Investigation >
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FINANCE AND ADMINISTRATION DIVISION

During 2025, the Finance and Administration Division continued to play an integral role in the successful operations of the Commission, by providing important management and employee services. Among the major areas handled and overseen by the Division are budget planning and analysis, purchasing/procurement, personnel and payroll administration, mail processing, and facilities management. Additionally, the Finance and Administration Division oversees multi-function devices and all other machinery maintenance for the entire Commission. Finally, reception services for the Commission are housed within the Finance and Administration Division. A great source of pride for all associated with the Commission is the fact that all telephone inquiries are still courteously and efficiently handled personally by a knowledgeable staff member and are not simply forwarded to a voicemail or telephone menu.

BUDGET

One of the major areas of responsibility for the Finance and Administration Division is the preparation, analysis, and management of the Commission's budget. The Commission's fiscal year 2026 Direct State Services adjusted appropriation is \$6,332,000, which is a decrease of \$330,000 from the fiscal year 2025 Direct State Services adjusted appropriation. The \$330,000 decrease was a result of a \$320,000 increase from the salary program to offset increases in salaries and the elimination of the \$650,000 one-time funding that was provided in FY25 to comply with the requirements of Daniel's Law. Thus, the Finance and Administration Division staff continued to work to ensure the accurate budgeting and management of expenditures.

In 2025, the Finance and Administration Division collaborated with the Compliance Division to provide funding for gubernatorial candidates in both the primary and general elections.

The primary election featured eight candidates who received public financing, totaling \$38,360,556.24.

Of these, five candidates were allocated the maximum amount of \$5,500,000 each.

In the general election, two candidates received public financing, with each receiving the maximum amount of \$12,500,000. The total disbursement for the general election amounted to \$25,000,000. Combined, the primary and general elections saw a historic total of \$63,360,556.24 disbursed by ELEC during calendar year 2025.

During 2025, the Finance and Administration Division staff worked tirelessly with other Commission Divisions to ensure the efficient management of the budget and the purchasing of necessary supplies and services, in order to keep the Commission functioning at an optimal level.

PERSONNEL

Another major area of responsibility for the Finance and Administration Division is the coordination and management of personnel activities for the entire Commission. The Finance and Administration Division staff successfully worked with the Civil Service Commission and the Governor's Office during 2025 to comply with all State personnel rules and regulations in backfilling positions. This has allowed overall staff levels to remain unchanged over the past few years.

ELEC staff began working remotely from 2020 throughout the COVID-19 pandemic but were required to return to full-time in-person work in early 2022. After a few months of entirely in-office work, the Governor's office and Civil Service Commission introduced guidelines for a Pilot Telework Program. The Finance and Administration Division was tasked with creating and implementing our Pilot Telework Program, which began in June 2022. The permanent Telework Program was approved by Civil Service Commission rule in mid-2025. ELEC created and implemented the Permanent Telework Program in early January 2026, which continues the pilot program allowance of eligible staff to work two days remotely and three days in-office.

FINANCE AND ADMINISTRATION DIVISION
(continued)



ELEC continued to follow all safety protocols and guidelines set forth by the CDC and the Governor’s office throughout 2025, ensuring the well-being of our staff as well as ensuring operations remain uninterrupted. As of early 2026, per Executive Order 415, the State of Emergency related to COVID was lifted.

OTHER RESPONSIBILITIES

In addition to handling budget, fiscal and personnel matters for the Commission, the Finance and Administration Division is also responsible for general administrative functions, such as reception, mail processing, overseeing machinery and equipment maintenance, and acting as the Commission’s liaison with Building Management. During 2025, the Division continued to work to maintain an atmosphere

where all other Divisions could focus solely on their respective roles within the Commission, without concern for these day-to-day administrative issues.

CONCLUSION

By providing important management and employee services in a timely and professional manner, the Finance and Administration Division has been an integral part of the Commission. During 2025, the Division operated within the parameters established by the Department of Treasury and the Governor’s Office and continued to handle all responsibilities effectively.

COMPARISON OF FISCAL YEARS 2025 AND 2026 ORIGINAL DSS APPROPRIATIONS

	FY 2025 APPROPRIATION	FY 2026 APPROPRIATION
Salaries and Wages	\$5,188,000	\$5,508,000
Printing and Supplies	\$39,000	\$39,000
Services Other Than Personal	\$1,433,000	\$783,000
Maintenance and Fixed Charges	\$2,000	\$2,000
TOTAL OPERATIONAL	\$6,662,000	\$6,332,000

2025 EVALUATION DATA

Disclosure Reports (Total)	40,520
Campaign and Quarterly	31,714
Lobbyist	6,270
Pay-to-Play	2,419
Professional Campaign Fundraiser	117
Investigations	45
Complaints	164
Public Assistance Requests	9,310
Fine Collection	\$139,254
Lobbying Annual Fees	\$434,050
Campaign Fundraiser Annual Fees	\$24,000



COMMISSION STAFF AND ORGANIZATION CHART

EXECUTIVE

Amanda S. Haines, Esq., Executive Director
Joseph W. Donohue, Deputy Director
 Steven Kimmelman
 Christopher Vigale
 Maureen Tilbury

COMPLIANCE DIVISION

Aurea Vazquez-Alexander, Compliance Director
 Carl Skurat
 Daniel Horowitz
 Deegan Lewer
 Desiree DeVito
 Gianna Sama
 Kimberly Key
 Madeline Martinez-Fuentes
 Maite Hopkins
 Michel Donato-Suarez
 Milene Matos
 Monica Triplin-Nelson
 Nancy Fitzpatrick
 Titus Kamal
 Walter Leavey, Jr.
 Israt Jahan
 Jasmine Sweat
 Jilvia D’Sousa
 Patrick Devine
 Taylor Brickhouse

FINANCE & ADMINISTRATION DIVISION

Christopher Mistichelli, Director
 Aracelis Brown
 Barbara Rann
 Cheryl Lippincott
 Christine Clevenger
 Elaine J. Salit
 Kelvin Fisher
 Samantha Schutzbank
 Tamika McCoy

LAW DIVISION

Theresa J. Lelinski, Esq., Legal Director
Scott Miccio, Esq., Deputy Legal Director
 Alissa Young, Esq.
 Amy McClelland, Esq.
 Benjamin Kachuriner, Esq.
 Kelley Keane-Dawes, Esq.
 Sabrina Melo, Esq.

REVIEW AND INVESTIGATION

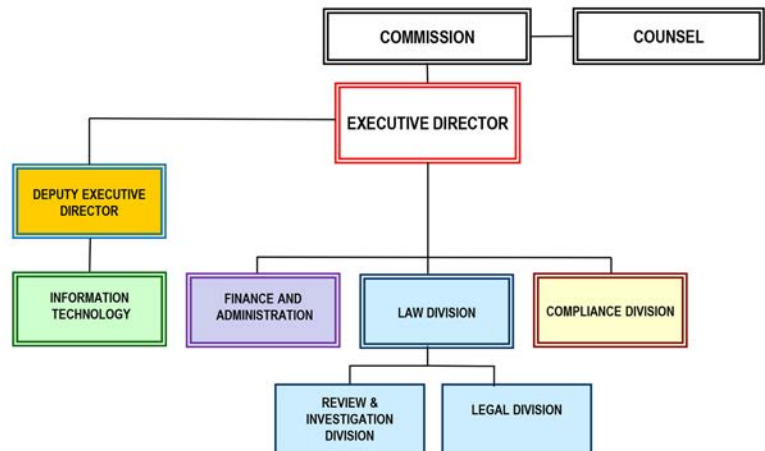
Shreve E. Marshall, Jr., Director
 Brett Mead
 Christopher Gear
 Danielle Hacker
 Laura Jurkiewicz
 Marcus Malmignati
 Matthew Krinsley
 Tamico Flack

INFORMATION TECHNOLOGY DIVISION

Anthony Giancarli, Director
 Aydan A. Altan
 Brian Robbins
 Elias J. Amaya
 Ken Colandrea
 Kim Swartz
 Louis Solimeo
 Maryanne Garcia
 Peter Palaitis
 Susan Danley

INFORMATION TECHNOLOGY DATA

Brenda A. Brickhouse
 Darlene Kozlowski
 Elizabeth Michael
 Helen Kelly
 Shirley R. Bryant





ELEC OVERVIEW

1973

Frank P. Reiche, Chair
Judge Sidney Goldmann, Vice Chair
Judge Bartholomew Sheehan, Commissioner
Florence P. Dwyer, Commissioner

1974-1979

Frank P. Reiche, Chair
Judge Sidney Goldmann, Vice Chair
Josephine Margetts, Commissioner
Archibald S. Alexander, Commissioner

1980-1981

Judge Sidney Goldmann, Chair
Josephine Margetts, Vice Chair
Andrew C. Axtell, Commissioner
M. Robert DeCotiis, Commissioner

1982-1983

Andrew C. Axtell, Chair
M. Robert DeCotiis, Vice Chair
Justice Haydn Proctor, Commissioner
Alexander P. Waugh, Jr., Commissioner

1984-1986

Andrew C. Axtell, Chair
Alexander P. Waugh, Jr., Vice Chair
Justice Haydn Proctor, Commissioner
Owen V. McNanny III, Commissioner

1987-1988

Judge Stanley G. Bedford, Chair
Owen V. McNany, III, Vice Chair
Andrew C. Axtell, Commissioner
David Linett, Commissioner

1989-1990

Judge Stanley G. Bedford, Chair
Owen V. McNany, III, Vice Chair
David Linett, Commissioner
S. Elliott Mayo, Commissioner

1991-1992

Owen V. McNany, III, Chair
Judge Stanley G. Bedford, Commissioner
David Linett, Commissioner

1993-1994

Owen V. McNany, III, Chair
William H. Eldridge, Vice Chair
David Linett, Commissioner

1995

William H. Eldridge, Chair
Owen V. McNany, III, Vice Chair
David Linett, Commissioner
Michael Chertoff, Commissioner

1996

Judge Ralph V. Martin, Chair
David Linett, Vice Chair
Paula A. Franzese, Commissioner

1997-2000

Judge Ralph V. Martin, Chair
David Linett, Vice Chair
Paula A. Franzese, Commissioner
Lynnan B. Ware, Commissioner

2001

Judge Ralph V. Martin, Chair
Paula A. Franzese, Vice Chair
Lynnan B. Ware, Commissioner
Susan S. Lederman, Commissioner

2002-2003

Judge Ralph V. Martin, Chair
Paula A. Franzese, Vice Chair
Susan S. Lederman, Commissioner
Peter J. Tober, Commissioner

2004-2006

Jerry Fitzgerald English, Chair
Peter J. Tober, Vice Chair
Albert Burstein, Commissioner
Judge Theodore Z. Davis, Commissioner

2007

Jerry Fitzgerald English, Chair
Peter J. Tober, Vice Chair
Albert Burstein, Commissioner

2008-2009

Jerry Fitzgerald English, Chair
Peter J. Tober, Vice Chair
Albert Burstein, Commissioner
Judge Amos C. Saunders, Commissioner

2010

Jerry Fitzgerald English, Chair
Judge Amos C. Saunders, Vice Chair
Albert Burstein, Commissioner
Ronald DeFilippis, Commissioner

2011

Ronald DeFilippis, Chairman
Walter F. Timpone, Vice Chairman
Judge Amos C. Saunders, Commissioner
Judge Lawrence Weiss, Commissioner
(Appointed 04/2011-Deceased 11/13/2011)
Jerry Fitzgerald English, Commissioner
(Retired 03/15/2011)

2012-2015

Ronald DeFilippis, Chairman
Walter F. Timpone, Vice Chairman
Judge Amos C. Saunders, Commissioner
(Deceased 08/16/2015)

2016

Ronald DeFilippis, Chairman
Walter F. Timpone, Vice Chairman
(Resigned 05/02/2016)

2017 (Retired 07/2017)

Ronald DeFilippis, Chairman

03/2017-03/2023

Eric H. Jaso, Chairman
Judge Stephen M. Holden, Commissioner

07/2017-03/2023

Marguerite T. Simon, Commissioner

06/2023-PRESENT

Thomas H. Prol, Chairman
Ryan Peters, Commissioner
Norma R. Evans, Commissioner
Jon-Henry Barr, Commissioner

EXECUTIVE DIRECTORS

1973-1976	David F. Norcross
1976-1981	Lewis B. Thurston, III
1981-1984	Scott A. Weiner
1984-2009	Frederick M. Herrmann
2009-2023	Jeffrey M. Brindle
11/2023-05/2024	Joseph W. Donohue*
2024 to Present	Amanda S. Haines

LEGAL COUNSEL

1973-1994	Edward J. Farrell
1994-2012	James P. Wyse
2012-Present	Edwin R. Matthews

*Acting Director