



# ELEC tronic

An Election Law Enforcement Commission Newsletter

ISSUE 118 • APRIL 2019

## Comments from the Chairman Eric H. Jaso

With the June primary just two months away, this column will discuss the permissible uses of campaign funds.

The appropriate use of campaign funds is an important issue for candidates and treasurers to understand.

The proper disposition of campaign funds lies at the heart of maintaining the integrity of the electoral process in New Jersey.

Campaign funds may be used in six ways. Born of the 1993 campaign finance and lobbying reforms, the Legislature determined to restrict the ways by which treasurers may dispense funds raised from contributions.

According to the Campaign Contributions and Expenditures Reporting Act, contributions received by a candidate, candidate committee, joint candidates committee, or legislative leadership committees “shall be used only for the following purposes.”

1. to pay campaign expenses;
2. to make charitable contributions;
3. to pay administrative expenses related to the respective committee;
4. to contribute to another candidate committee, political committee or political party committee;
5. to repay contributors on a pro-rata basis; and
6. to pay for the ordinary and necessary expenses of holding public office.

To pay for the “ordinary and necessary expenses of holding public office” means to underwrite any expenses that promotes the responsibilities of a person holding elective office.

What is prohibited, however, is spending campaign money for the furnishings, staffing, or operations of an office related to the officeholder’s official duties.

Among the permissible uses are campaign expenditures for such things as seminars, newsletters, and nominal purchases of get-well-gifts and memorials for constituents.

For a complete list of permissible uses under the ordinary and necessary language readers should consult N.J.A.C. 19:25-6.7.

One last, but critically important note: Using campaign funds for personal use or to pay the costs associated with one’s legal defense in a criminal matter is strictly forbidden.

A candidate cannot, for example, use his or her campaign funds to pay the mortgage or tuition. Nor, can he or she use them to defend against a criminal charge.

In conclusion, the Legislature in 1993 had good reason to place restrictions on the uses of campaign funds. Donors make contributions to candidates because they support their candidacies for public office.

Contributors expect their donations to be used for that purpose and that purpose alone—not for personal use or for uses that do not promote the objectives of the candidate as an officeholder.

## “Furthering the Interest of an Informed Citizenry”

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### COMMISSIONERS:

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## DISCLOSURE BILL (S-1500/A-1524) AWAITS ACTION FROM GOVERNOR PHIL MURPHY

By Joe Donohue

The state Legislature on March 25, 2019 gave final approval to a bill (S-1500/A-1524) that would greatly expand disclosure of financial activity by independent special interest groups in elections and grassroots lobbying.

In a flurry of activity, the bill won bipartisan support from the state Assembly, passing 60-1 before heading to the Senate for approval of changes that had been made by the Assembly Appropriations Committee on March 18, 2019.

The upper house, also with bipartisan backing, then voted 33-0 to approve another slightly amended version that required a second Assembly vote. The final okay later came 66-2 from the lower house.

Governor Phil Murphy has 45 days from the day of the vote to approve, veto or modify the legislation. If approved by the Governor, the bill would take effect on October 15, 2019.

“Information is power, and we need to arm voters with the most information possible,” said Assemblyman Andrew Zwicker (D-16), sponsor of the Assembly version of the bill.

“More disclosure will inform residents about groups working to influence political and legislative processes. Greater transparency will lead to an increase in voter confidence and that’s a good thing for New Jersey and for democracy,” Zwicker said.

Legislators of both parties have worked with New Jersey Election Law Enforcement Commission (ELEC) staff since 2016 to develop the legislation. ELEC has been advocating more disclosure by independent groups since 2010.

ELEC Executive Director Jeff Brindle said he appreciated support from members of both parties and believes New Jersey voters will be well-served by their action.

“Since 2010, there has been an exponential growth in outside group spending in New Jersey. In fact, independent group spending has eclipsed political parties and threatens to outpace candidates themselves,” he said.

“Given this drastic shift in the electoral landscape, it is only fair that independent special interest groups be asked to follow the same disclosure rules as parties and candidates,” Brindle said.

Under amendments made by the Assembly Appropriations Committee on March 18, 2019, the bill no longer will apply retroactively and no longer will include increases in contribution limits for this fall’s election.

Legislators did not rule out boosting contribution limits in the future. Except for gubernatorial candidates, contribution limits have not been adjusted for inflation since 2005.

The following chart lists changes the bill makes to disclosure requirements for independent special interest groups.

Disclosure Law Comparison	Current		Proposed Under S-1500/A-1524	
	Contributions	Expenditures	Contributions	Expenditures
Threshold for Filing Disclosure Report	No Disclosure Required	Spending Above \$1,600	Spending Above \$3,000	
Amount Disclosed	No Disclosure Required	All	>\$10,000	>\$3,000
Group Does Express Advocacy* Ads	No Disclosure Required	Disclosure Required	Disclosure Required	Disclosure Required
Group Does Election-related Issue Ads (Electioneering)	No Disclosure Required	No Disclosure Required	Disclosure Required	Disclosure Required
Group Does Non-Election Issue Ads (Grassroots Lobbying)	Disclosure rare**	Disclosure Required	Disclosure Required	Disclosure Required

\*Express advocacy means explicit appeals for votes using phrases like "vote for" or "vote against."

\*\*Only if donations were given with the specific intent of communicating with the public.

Note: This chart refers to legal requirements. Some independent groups have voluntarily disclosed their donors and expenditures.

## Executive Director's Thoughts

### Jeff Brindle

## Pending Disclosure Bill Requires "Civic Courage"

Reprinted from [insidernj.com](http://insidernj.com)

Legislation requiring registration and disclosure by independent, outside groups was passed by the Senate recently by a unanimous, bipartisan vote of 31-0.

S-1500, sponsored by State Senator Troy Singleton (D-7th), brings so-called "Dark Money" groups, or independent factions, "largely" in line with political parties, continuing political committees (PACs) and candidates in terms of registration and disclosure.

The word "largely" is significant. Though under the legislation, independent factions, or special interests, would, like parties, PACs, and candidates, be required to disclose contributions and expenditures, they would, nevertheless, still have advantages.

Contributions to parties, PACs, and candidates are subject to contribution limits. By virtue of the 2010 U.S. Supreme Court decision *Citizens United v FEC*, contributions to independent factions are unlimited.

Moreover, while all financial activity by parties, PACs, and candidates are regulated under the campaign finance law, only those contributions and expenditures designated by independent groups for influencing elections and issue advocacy would require disclosure.

Pursuant to 2011 D.C. Federal District Court decision in *Carey v. FEC*, these independent organizations could establish, separate, segregated bank

accounts for the purpose of depositing contributions and making expenditures for the purpose of influencing elections and public policy.

Funds used for general operations, general social-welfare purposes, and other non-election or issue related functions would not be subject to disclosure.

Finally, to avoid any possibility of divulging membership fee payments, or small donations, the bill requires only large donations of over \$10,000 to be shared with the public by independent groups.

In the gubernatorial/legislative contests of 2013 and 2017, and the congressional election of 2018, independent factions spent \$138 million, more than twice as much as county and state party committees combined.

Further, in terms of lobbying and issue advocacy, in 2017 about \$90 million was reported under the lobbying law. This figure does not include lobbying and issue advocacy at the local level and activity statewide that while not disclosed currently would be under the proposed legislation.

Despite the growing influence over the State's elections and public policy by independent groups, and despite the disparity in disclosure requirements between them and parties, PACs, and candidates, there are those that contend that special interest independent groups deserve special treatment not provided to the other entities under the law.

One criticism suggests that S-1500 will discourage people from political participation, including contributing to not-for-profit groups. This view maintains that disclosure of contributions over \$10,000 may subject the donor to intimidation and harassment.

Obviously, such behavior should be strongly discouraged and subject to stringent penalties. But it should not be a reason for a free people to fail to participate in politics.

If that were the case, the colonials would never have declared independence from Great Britain. Surely, the 56 delegates to the Second Continental Congress who signed the Declaration on July 4, 1776 were subject to much greater fear and harassment than the multitude of people who make political contributions today will ever experience.

These courageous men were considered traitors to Britain. They and their families had to escape the grip of the Redcoats.

As the late Supreme Court Justice Antonin Scalia said, "Requiring people to stand up in public for their political acts fosters civic courage, without which democracy is doomed. For my part, I do not look forward to a society which, thanks to the Supreme Court, campaigns anonymously... hidden from public scrutiny and protected from the accountability of criticism. This does not resemble the Home of the Brave."

Scalia's sentiments were in the tradition of Aristotle who believed every citizen has a duty to participate in politics and further their personal development.

Another argument often made is that anonymous speech is in the tradition of America. To bolster this claim, the Federalist Papers are often mentioned as an example of three founding fathers who wanted to protect their identity.

This argument is misleading. The authors of the Federalist Papers, Alexander Hamilton, James Madison, and John Jay went under the pseudonym Publius not out of fear of retribution or criticism but to identify themselves with the great Roman

champion of republican government  
Publius Valerius Publicola.

Publius was involved with the founding of the Roman Republic. Indeed, it was not uncommon for leaders of the day to write under the name of Roman heroes who stood for the republic. The pseudonyms Cato, Brutus, and Cassius were used by anti-federalists as well. These were all heroes to the Americans.

Another criticism of the bill requires a response.

Regarding the ban on officeholders serving as chairpersons or treasurers of independent groups, this provision mirrors that which applies to political parties and continuing political committees. It exists to prevent the circumvention of contribution limits which apply to officeholders, who are considered candidates under the Campaign Act.

S-1500 is a good government bill that will bring greater transparency to elections in New Jersey as well as to public policy debates.

A companion bill in the Assembly, which as yet has not taken up the measure, is sponsored by Assemblyman Andrew Zwicker (D-16th).

The passage of this legislation is needed to bring balance to electoral politics in New Jersey and to help citizens to become more educated and informed as to who is behind the “Dark Money” groups that are increasing their influence over elections and public policy in the State.

As James Madison wrote in 1822, “A popular Government, without popular information, or the means of acquiring it, is a Prologue to a farce or a tragedy, or, perhaps both.”

## TRAINING SEMINARS

### ELEC TRAINING SESSIONS

The seminars listed will be held at the Election Law Enforcement Commission  
25 South Stockton Street, 1<sup>st</sup> Floor

For registration information, please visit ELEC’s website at:  
[https://www.elec.nj.gov/seminar\\_train/SeminarTraining.html](https://www.elec.nj.gov/seminar_train/SeminarTraining.html)

IN-PERSON TRAINING SEMINARS BEGINS AT 10:00 AM				
<b>CAMPAIGN TREASURER</b>	4/2/2019	4/18/2019	9/12/2019	10/1/2019
<b>PAC (CPC/PPC)</b>	6/13/2019	9/17/2019	10/3/2019	
<b>ELEC EFILE (R-1 FILERS)</b>	4/23/2019	5/2/2019	7/18/2019	9/19/2019
<b>ELEC EFILE (R-3 FILERS)</b>	5/1/2019	9/24/2019		

### Electronic File Filing System

Please register for one of the following **Webinars** at:  
[https://www.elec.nj.gov/seminar\\_train/SeminarTraining.html](https://www.elec.nj.gov/seminar_train/SeminarTraining.html)

WEBINARS		
<b>ELEC EFILE (R-1 FILERS)</b>	4/9/2019	10:00 am
	4/11/2019	2:00 pm
	5/7/2019	10:00 am
	5/16/2019	2:00 pm
<b>ELEC EFILE (R-3 FILERS)</b>	4/3/2019	10:00 am
	5/15/2019	2:00 pm
	5/21/2019	10:00 am

## Wind, Weed and Atoms Powered Lobbying Spending in 2018

Spending surges by groups that want to erect offshore windmills and to legalize marijuana in New Jersey, combined with a second year of spending related to special ratepayer subsidies for nuclear plants, reflected some of the top state lobbying issues in 2018.

While overall lobbying spending was down slightly, annual reports filed with the New Jersey Election Law Enforcement Commission (ELEC) showed expenditures rose in areas where lobbying was especially fervent:

- Firms hoping to install wind turbines off the New Jersey coast increased spending 234 percent from \$261,664 in 2017 to \$874,679 in 2018.
- Businesses and interest groups with stakes in medical marijuana, or that support or oppose legalization of recreational marijuana, ramped up spending 319 percent from \$330,935 in 2017 to \$1,388,076 in 2018.
- Spending by groups that support or oppose ratepayer subsidies to keep New Jersey's three nuclear plants from closing hovered around \$5 million again in 2018.

Jeff Brindle, ELEC's Executive Director, said regardless of how much money is spent on lobbying each year, there are always policy matters that draw controversy and aggressive advocacy.

"Lobbying is a vital and fundamental part of democracy. Total dollars spent rise and fall each year. But there are always new issues driving lobbyists to educate and persuade executive branch officials, legislators and, many times, the public," said Brindle.

Following a record year for spending in 2017, overall lobbying expenditures dipped 2.5 percent to \$89.4 million. This number is preliminary since late-arriving reports and amendments are likely to increase the total.

**Table 1**  
**Total Spending by Lobbyists in New Jersey 2014-2018**

YEAR	EXPENDITURES	CHANGE-\$	CHANGE-%
2018*	\$ 89,441,327	\$ (2,277,482)	-2.5%
2017	\$ 91,718,809	\$ 1,356,680	1.5%
2016	\$ 90,362,129	\$ (1,142,581)	-1.2%
2015	\$ 91,504,710	\$ 8,024,394	9.6%
2014	\$ 83,480,316	\$ (5,234,788)	-5.9%

In May 2018, Governor Phil Murphy enacted legislation (S-3723) that set ambitious new goals for New Jersey for alternative energy production. One aim is to generate 3,500 megawatts of electricity from floating, ocean-based wind turbines by 2030.

Several firms ramped up their lobbying activity in 2018 in anticipation of the deep sea "gold rush" that will create an entire industry in the Garden State. Many firms from outside New Jersey or even the United States engaged in lobbying last year.

**Table 2**  
**Lobbying Spending Involving Offshore Wind Production**

GROUP	2018	2017
Ørsted North America Inc	\$330,206	\$158,164
NextEra Energy Resources	\$199,379	\$ 72,000
EDF Renewable Development	\$ 94,982	
Deep Water Wind LLC	\$ 94,556	\$ 7,500
Anbaric Development Partners	\$ 75,000	
Equinor	\$ 30,000	
American Wind Energy Associates (Awea)	\$ 24,000	\$ 24,000
Fishermans Energy	\$ 18,627	
Siemens Gamesa Renewable Energy	\$ 7,929	
<b>Total</b>	<b>\$874,679</b>	<b>\$261,664</b>

New Jersey legalized medical marijuana in January 2010 and a full legalization bill was first proposed in January 2014 by state Senator Nicholas Scutari (D-22). But Scutari's bill languished several years because former Republican Governor Chris Christie opposed it. All six Democratic gubernatorial candidates, including Murphy, who ran in 2017 to fill Christie's seat supported legalized marijuana.

After Murphy took office in January 2018, and with Democrats controlling both legislative houses, lobbying activity escalated on the proposed marijuana legalization bill (S-2703). Statehouse leaders still are trying to hammer out the final details of the complex measure. Murphy also administratively expanded the state's medical marijuana program last year.

Further expansion of legalized marijuana would mean huge growth for the fledgling industry. Many companies hoping to play a role in its growth have hired a fleet of lobbyists on their behalf.

**Table 3**  
**Groups Represented by Lobbyists on Marijuana Issues**

GROUP	2018	2017
Acreage Holdings	\$ 120,000	
Abira Medical Laboratories LLC D/B/A Genesis Diagnostics	\$ 70,000	
Aria Mello LLC	\$ 12,000	
Biotrack Thc	\$ 12,000	
Cherry Hill Skinny Investors	\$ 67,419	
Compassionate Care Foundation	\$ 48,000	\$ 12,000
Compassionate Care Research Institute Inc.	\$ 97,500	\$ 95,000
Compassionate Sciences	\$ 20,000	\$ 55,000
Curaleaf NJ, Bellmawr	\$ 71,500	
Eaze Solutions Inc	\$ 130,311	
Eliasof, Steven And Holub, Michael	\$ 7,500	
Galenas New Jersey LLC	\$ 18,061	
Formula Two Realty LLC	\$ 22,714	
Garden State of Mind	\$ 37,500	
Garden State Releaf	\$ 7,500	
Green Medicine NJ	\$ 30,008	
Greenwich Biosciences Inc	\$ 42,000	\$ 42,000
GW Pharmaceuticals	\$ 42,000	\$ 42,000
IMX Medical Management Services Inc	\$ 1,750	
Mainline Investment Partners	\$ 30,000	
Modern Remedies LLC	\$ 20,000	
Mtrac Tech Corp	\$ 2,000	
New Jersey Cannabusiness Association	\$ 67,000	\$ 53,000
Panacea Inc	\$ 66,334	
Pharmacann LLC	\$ 28,000	
Pure NJ LLC/ Moxie	\$ 16,417	
Ruby Farms USA LLC	\$ 60,000	
RemedyNJ/Remedy Columbia	\$ 52,562	
Responsible Approaches to Marijuana Policy (Ramp)	\$ 24,000	
Sanctuary Medicinals	\$ 10,000	
Telebrands Corp	\$ 24,000	
Terra Tech	\$ 60,000	\$ 16,935
Vinedrea	\$ 10,000	
Weedmaps	\$ 60,000	\$ 15,000
<b>Totals</b>	<b>\$1,388,076</b>	<b>\$330,935</b>

Note: Lobbyist clients where no fees were reported: Applied Cannabis Sciences; Canna-Dynamics LLC; Mandel Distributors; Marijuana Policy Project, Nuka Enterprises LLC.



Another issue that continued to draw heavy lobbying attention and spending in 2018 was legislation (S-2313) enacted in May 2018 by Governor Murphy.

The new law has been controversial because it gives the state Board of Public Utilities power to impose a special surcharge on electricity consumers of up to \$300 million annually to help keep the state's three nuclear plants in operation. BPU still is deliberating over the matter, which could cost average ratepayers an extra \$25 to \$30 annually.

The subsidy issue has caused a clash of titans, with PSE&G and JCP&L, the state's two largest electric utilities, and Exelon Generation, one of the nation's top power plant operators, on one side, and, on the opposing side, groups like NJ Petroleum Council (and its parent firm, American Petroleum Council), Chemistry Council of NJ, AARP and New Jersey businesses that are large electricity consumers.

**Table 4**  
**Major Groups Lobbying on Nuclear Plant Subsidy Legislation**

GROUP	2018 SPENT	2017 SPENT	DIFF- \$	DIFF-%
Public Service Enterprise Group	\$1,475,770	\$2,350,364	\$(874,594)	-37%
First Energy/JCPL	\$ 445,800	\$ 385,800	\$ 60,000	16%
Exelon Generation Co LLC	\$ 337,070	\$ 193,590	\$ 143,480	74%
<b>Support-Total</b>	<b>\$2,258,640</b>	<b>\$2,929,754</b>	<b>\$(671,114)</b>	<b>-23%</b>
AARP	\$ 722,562	\$ 600,552	\$ 122,010	20%
NJ Coalition for Fair Energy*	\$ 679,332	\$ 939,058	\$(259,726)	-28%
NJ Petroleum Council	\$ 595,444	\$ 103,448	\$ 491,996	476%
Chemistry Council of NJ	\$ 215,353	\$ 203,390	\$ 11,963	6%
NJ Large Energy Users Coalition	\$ 200,000		\$ 200,000	
NRG Energy	\$ 358,753	\$ 110,000	\$ 248,753	226%
Calpine Corp.	\$ 3,000		\$ 3,000	
<b>Opposed-Total</b>	<b>\$2,774,444</b>	<b>\$1,956,448</b>	<b>\$ 817,997</b>	<b>42%</b>
<b>Total</b>	<b>\$5,033,084</b>	<b>\$4,886,202</b>	<b>\$ 146,882</b>	<b>3%</b>

\*Received \$204,865 from Calpine Corp., \$194,377 from Dynergy Inc., and \$188,127 from NRG Energy in 2018

Note: Some groups on this list like AARP lobbied on multiple issues so their entire spending did not relate to the nuclear subsidy issue.

Three of the five special interest groups that spent heaviest on communications- Public Service Enterprise Group, NJ Petroleum Council, and NJ Coalition for Fair Energy- also lobbied on the nuclear subsidy issue. Represented entities as a group spent 10 percent on communications.

**Table 5**  
**Top Five Expenditures on Communications**  
**in 2018 by Represented Entity**

GROUP	COMMUNICATIONS	TOTAL	%
Public Service Enterprise Group	\$914,421	\$1,475,770	62
Engineers Labor Employer Cooperative	\$774,906	\$ 970,528	80
NJ Petroleum Council	\$539,394	\$ 595,444	91
NJ Coalition for Fair Energy	\$531,212	\$ 679,332	78
New Direction NJ Corporation	\$503,216	\$ 503,750	99.9

Communications spending by all represented entities totaled \$6.5 million - a 23 percent reduction from 2017. The highest spending ever was \$15.2 million in 2011.

**Table 6**  
**Total Annual Spending on Lobbying Communications - 2014-2018**

YEAR	AMOUNT	CHANGE-\$	CHANGE-%
2018	\$ 6,471,942	\$ (1,979,856)	-23%
2017	\$ 8,451,798	\$ (2,123,150)	-20%
2016	\$10,574,948	\$ (4,204,761)	-28%
2015	\$14,779,709	\$ 11,044,746	296%
2014	\$ 3,734,963	\$ (3,081,016)	-45%

The top 50 represented entity spenders, making up just 6 percent of the 858 filers, spent \$21 million- 34 percent- of the \$62.2 million in reported spending by represented entities (See Table 11). Among the top 50, energy interests and hospitals were the biggest spenders in 2018.

**Table 7**  
**Spending by Top 50 Special Interest Groups by Type**

SPECIAL INTEREST TYPE	SPENT	SPECIAL INTEREST TYPE	SPENT
Energy	\$5,386,256	Government	\$ 527,139
Hospital	\$3,256,132	Pharmaceutical	\$ 494,012
Insurance	\$1,689,892	Union	\$ 484,740
Transportation	\$1,523,290	Legal	\$ 474,693
Business	\$1,469,682	Accounting	\$ 373,190
Telecommunications	\$1,320,850	Tobacco	\$ 307,704
Ideological	\$1,226,312	Finance	\$ 298,893
Real Estate	\$1,142,095	Nursing Homes	\$ 242,914
Gaming	\$ 801,774	<b>Grand Total</b>	<b>\$21,019,568</b>

**Engineers Labor Employer Cooperative reported the biggest increase in spending dollar-wise in 2018. It was up \$504,087, or 108 percent.<sup>1</sup> The group supports public funding for transportation projects and lobbied on various legislation involving bidding and contract rules.**

**Table 8**  
**Top Ten Largest Increases in Spending (By Dollar Amount)**

GROUP	2018	2017	DIFFERENCE-\$
Engineers Labor Employer Cooperative	\$970,528	\$466,441	\$504,087
New Directions NJ Corporation	\$503,750		\$503,750
NJ Petroleum Council	\$595,444	\$103,448	\$491,996
New Jersey Realtors Issues Mobilization Fund	\$391,845		\$391,845
Igaming Cloud Inc	\$302,274		\$302,274
Hackensack Meridian Health	\$845,527	\$546,167	\$299,360
Municipal Parking Services	\$264,000	\$ 15,000	\$249,000
NRG Energy	\$358,753	\$110,000	\$248,753
NJ Manufacturers Insurance Group	\$467,045	\$225,721	\$241,324
Williams Companies	\$522,500	\$358,000	\$164,500

Several large represented entity spenders in 2017 were able to ratchet back their outlays as their issues were resolved or nearing resolution.

<sup>1</sup> A previous version of this press release said the biggest increase in spending in 2018 was by Williams Companies of Tulsa, Oklahoma, which owns several hundred miles of pipelines and five natural compressor stations in New Jersey. It actually ranked 10<sup>th</sup>, boosting its lobbying spending by \$164,500, or 46 percent, from \$358,000 to \$522,500. The ELEC analysis incorrectly assumed the company spent nothing in 2017 because, unlike this year and past years, it filed no L-2 report. L-2 reports authorize lobbyists to file a report on the client's behalf.



**Table 9**  
**Top Ten Largest Decreases**  
**in Spending (by Dollar Amount)**

GROUP	2018	2017	DIFFERENCE-\$
Horizon Blue Cross Blue Shield of NJ	\$ 429,841	\$2,524,921	\$(2,095,080)
Latino Consumer Alliance		\$1,415,000	\$(1,415,000)
Occidental Petroleum	\$ 99,711	\$1,198,526	\$(1,098,815)
NJ Food Council	\$ 207,694	\$1,151,556	\$ (943,862)
Protect Jersey Jobs		\$ 920,438	\$ (920,438)
Public Service Enterprise Group	\$1,475,770	\$2,350,364	\$ (874,594)
NJ Hospital Association	\$ 472,788	\$ 818,332	\$ (345,544)
NJ Coalition for Fair Energy	\$ 679,332	\$ 939,058	\$ (259,726)
Prudential Financial	\$ 565,532	\$ 778,353	\$ (212,821)
New Jersey Realtors	\$ 277,455	\$ 353,948	\$ (76,493)

The amount spent by lobbyists on “benefit passing”- gifts like meals, trips or other things of value- reached a new low in 2018 at \$2,331. That represents a 99 percent drop from the 1992 benefit passing peak of \$163,375.

Annual reports filed by lobbyists also indicate that 106 lobbyists served on 136 public authorities, boards and commissions. Some lobbyists serve on multiple boards.

The average number of lobbyists rose 2 percent to 922 in 2018. Despite the uptick, it remains 12 percent below the peak of 1,043 lobbyists in 2008. The number of reported clients fell to 1,915- a 7 percent drop from the peak of 2,077 in 2012.

For the sixteenth straight year, Princeton Public Affairs Group Inc. reported the top receipts among multi-client contract lobbying firms. Nine of 10 firms on the 2017 list remained there in 2018. Advocacy & Management Group was the newcomer.

**Table 10**  
**Top Ten Multi-Client Lobbying Firms**  
**Ranked by 2018 Receipts**

FIRM	2018 RECEIPTS
Princeton Public Affairs Group Inc	\$9,144,770
Public Strategies Impact LLC	\$7,184,927
Cammarano Layton & Bombardieri Partners LLC	\$3,164,924
Kaufman Zita Group LLC	\$2,890,239
MBI Gluckshaw	\$2,838,255
Gibbons PC	\$2,441,877
Optimus Partners LLC	\$2,207,850
Capital Impact Group	\$1,637,182
Advocacy & Management Group	\$1,502,290
Komjathy & Kean LLC	\$1,368,063

**Table 11**  
**Top 50 Represented Entity Spenders 2018**

<b>GROUP</b>	<b>2018 SPENT</b>	<b>2017 SPENT</b>	<b>DIFF-%</b>
Public Service Enterprise Group	\$ 1,475,770	\$ 2,350,364	-37%
Engineers Labor Employer Cooperative	\$ 970,528	\$ 466,441	108%
Hackensack Meridian Health	\$ 845,527	\$ 546,167	55%
AARP	\$ 722,562	\$ 600,552	20%
NJ Coalition for Fair Energy	\$ 679,332	\$ 939,058	-28%
NJ Petroleum Council	\$ 595,444	\$ 103,448	476%
Verizon NJ	\$ 584,100	\$ 652,124	-10%
Prudential Financial	\$ 565,532	\$ 778,353	-27%
NJ State League of Municipalities	\$ 527,139	\$ 516,786	2%
Williams Companies	\$ 522,500	\$ 358,000	46%
RWJBarnabas Health	\$ 515,610	\$ 497,498	4%
New Directions NJ Corporation	\$ 503,750		
New Jersey Education Association	\$ 484,740	\$ 512,656	-5%
Honeywell International Inc.	\$ 482,400	\$ 518,541	-7%
NJ Hospital Association	\$ 472,788	\$ 818,332	-42%
NJ Manufacturers Insurance Group	\$ 467,045	\$ 225,721	107%
NJ Business and Industry Association	\$ 463,551	\$ 414,910	12%
First Energy/JCPL	\$ 445,800	\$ 385,800	16%
Horizon Blue Cross Blue Shield of NJ	\$ 429,841	\$ 2,524,921	-83%
Atlantic City Electric	\$ 422,461	\$ 456,474	-7%
Atlantic Health System	\$ 414,981	\$ 379,402	9%
Carepoint Health Management Associates	\$ 413,331	\$ 395,677	4%
Comcast	\$ 406,044	\$ 406,044	0%
New Jersey Realtors Issues Mobilization Fund	\$ 391,845		
NJ Society of CPAs	\$ 373,190	\$ 246,013	52%
NRG Energy	\$ 358,753	\$ 110,000	226%
Exelon Generation Company LLC	\$ 337,070	\$ 193,590	74%
AT&T	\$ 330,706	\$ 277,740	19%
Altria Client Services Inc	\$ 307,704	\$ 172,600	78%
Virtua Health Inc	\$ 307,166	\$ 290,207	6%
Igaming Cloud Inc	\$ 302,274		
Ørsted North America Inc	\$ 300,206	\$ 158,164	90%
NJ Bankers Association	\$ 298,893	\$ 247,316	21%
NJ Coalition of Automotive Retailers Inc	\$ 288,762	\$ 203,779	42%
Cooper Health System	\$ 286,729	\$ 300,440	-5%
NJ Wine and Spirits Wholesalers Association	\$ 285,400	\$ 161,900	76%
New Jersey Realtors	\$ 277,455	\$ 353,948	-22%
Municipal Parking Services	\$ 264,000	\$ 15,000	1,660%
IGT & Affiliates	\$ 255,000	\$ 125,000	104%
Bayer US LLC	\$ 250,638	\$ 91,846	173%
Fuel Merchants Association of NJ	\$ 248,920	\$ 238,505	4%
Caesars Enterprise Services LLC	\$ 244,500	\$ 270,000	-9%
Health Care Institute of NJ	\$ 243,374	\$ 254,787	-4%
NJ Association of Health Care Facilities	\$ 242,914	\$ 218,440	11%
NJ State Bar Association	\$ 239,793	\$ 251,147	-5%
NJ Retail Merchants Association	\$ 238,331	\$ 259,998	-8%
NJ Apartment Association	\$ 236,545	\$ 217,976	9%
NJ Society of Architects	\$ 236,250		
NJ Association for Justice	\$ 234,900	\$ 234,300	0%
State Farm Insurance	\$ 227,474	\$ 186,966	22%
<b>Totals- Top 50 Represented Entity Spenders</b>	<b>\$21,019,568</b>	<b>\$20,161,472</b>	<b>4%</b>

Summary data provided for 2018 should be considered preliminary and incomplete.

This analysis reflects a review of reports received as of noon March 1, 2019. In New Jersey, lobbyists who raise or spend more than \$2,500 were required to file a report on February 15<sup>th</sup> that reflects activity from the prior calendar year.

Summary information about lobbyist activities in 2018 can be obtained at the following website:

[http://www.elec.state.nj.us/publicinformation/gaa\\_annual.htm](http://www.elec.state.nj.us/publicinformation/gaa_annual.htm). Copies of annual reports also are available on ELEC's website.

## 2019 Reporting Dates

	INCLUSION DATES	REPORT DUE DATE
<b>FIRE COMMISSIONER - FEBRUARY 16, 2019</b>		
29-day Preelection Reporting Date	Inception of campaign* - 1/15/19	1/18/2019
11-day Preelection Reporting Date	1/16/2019 - 2/2/2019	2/5/2019
20-day Postelection Reporting Date	2/3/2019 - 3/5/2019	3/8/2019
48-Hour Notice Reports Start on 2/3/2019 through 2/17/2019		
<b>APRIL SCHOOL BOARD – APRIL 16, 2019</b>		
29-day Preelection Reporting Date	3/15/2019*	3/18/2019
11-day Preelection Reporting Date	3/16/2019 - 4/2/2019	4/5/2019
20-day Postelection Reporting Date	4/3/2019 - 5/3/2019	5/6/2019
48-Hour Notice Reports Start on 4/3/2019 through 4/16/2019		
<b>MAY MUNICIPAL – MAY 14, 2019</b>		
29-day Preelection Reporting Date	4/12/2019*	4/15/2019
11-day Preelection Reporting Date	4/8/2019 - 4/30/2019	5/3/2019
20-day Postelection Reporting Date	5/1/2019 - 5/31/2019	6/3/2019
48-Hour Notice Reporting Starts on 5/1/2019 through 5/14/2019		
<b>RUNOFF (JUNE) ** - JUNE 11, 2019</b>		
29-day Preelection Reporting Date	No Report Required for this Period	
11-day Preelection Reporting Date	5/1/2019 - 5/28/2019	5/31/2019
20-day Postelection Reporting Date	5/29/2019 - 6/28/2019	7/1/2019
48-Hour Notice Reporting Starts on 5/29/2019 through 6/11/2019		
<b>PRIMARY (90-DAY START DATE: MARCH 6, 2019)*** - JUNE 4, 2019</b>		
29-day Preelection Reporting Date	Inception of campaign* - 5/3/2019	5/6/2019
11-day Preelection Reporting Date	5/4/2019 - 5/21/2019	5/24/2019
20-day Postelection Reporting Date	5/22/2019 - 6/21/2019	6/24/2019
48-Hour Notice Reporting Starts on 5/22/2019 through 6/5/2019		
<b>GENERAL (90-DAY START DATE: AUGUST 7, 2019)*** - NOVEMBER 5, 2019</b>		
29-day Preelection Reporting Date	6/22/2019 - 10/4/2019	10/7/2019
11-day Preelection Reporting Date	10/5/2019 - 10/22/2019	10/25/2019
20-day Postelection Reporting Date	10/23/2019 - 11/22/2019	11/25/2019
48-Hour Notice Reporting Starts on 10/23/2019 through 11/5/2019		
<b>RUNOFF (DECEMBER)** - DECEMBER 3, 2019</b>		
29-day Preelection Reporting Date	No Report Required for this Period	
11-day Preelection Reporting Date	10/23/2019 - 11/19/2019	11/22/2019
20-day Postelection Reporting Date	11/20/2019 - 12/20/2019	12/23/2019
48-Hour Notice Reporting Starts on 11/20/2019 through 12/3/2019		

**PACs, PCFRs & CAMPAIGN QUARTERLY FILERS**

1 <sup>st</sup> Quarter	1/1/2019 - 3/30/2019	4/15/2019
2 <sup>nd</sup> Quarter	4/1/2019 - 6/30/2019	7/15/2019
3 <sup>rd</sup> Quarter	7/1/2019 - 9/30/2019	10/15/2019
4 <sup>th</sup> Quarter	10/1/2019 - 12/31/2019	1/15/2019

**GOVERNMENTAL AFFAIRS AGENTS (Q-4)**

1 <sup>st</sup> Quarter	1/1/2019 - 3/30/2019	4/10/2019
2 <sup>nd</sup> Quarter	4/1/2019 - 6/30/2019	7/10/2019
3 <sup>rd</sup> Quarter	7/1/2019 - 9/30/2019	10/10/2019
4 <sup>th</sup> Quarter	10/1/2019 - 12/31/2019	1/10/2020

\*Inception Date of Campaign (first time filers) or from January 1, 2019 (Quarterly filers).

\*\*A candidate committee or joint candidates committee that is filing in a 2019 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 15, 2019 for the Primary Election Candidates and June 14, 2019 for the Independent General Election Candidates.

Note: A fourth quarter 2018 filing is needed for the Primary 2019 candidates if they started their campaign prior to December 6, 2018. A second quarter 2018 filing is needed by Independent/Non-Partisan General Election candidates if they started their campaign prior to May 9, 2018.

**HOW TO CONTACT ELEC**

[www.elec.state.nj.us](http://www.elec.state.nj.us)

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 By Telephone: (609) 292-8700 or Toll Free Within NJ 1-888-313-ELEC (3532)

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