

NEW JERSEY ELECTION LAW ENFORCEMENT COMMISSION  
25 South Stockton St., 5th Floor Trenton, New Jersey 08608  
P.O. Box 185 Trenton, New Jersey 08625-0185

IN THE MATTER OF  
SPADEA FOR GOVERNOR,  
A SINGLE CANDIDATE COMMITTEE  
FOR THE 2025 PRIMARY ELECTION

AMENDED  
ORDER TO  
SHOW CAUSE

TO: Spadea for Governor, a Single Candidate Committee for the 2025 Primary Election  
PO Box 307  
Bayville, NJ 08721

William G. "Bill" Spadea  
4371 Province Line Rd.  
Princeton, NJ 08540

Townsquare Media aka Townsquare Media Trenton and/or Townsquare Media  
Monmouth-Ocean and/or Townsquare Media Atlantic City, and other names and corporate forms  
Angelo J. Genova, Esq.  
Genova Burns LLC  
494 Broad St.  
Newark, NJ 07102

The New Jersey Election Law Enforcement Commission (ELEC or the Commission) is empowered to enforce the New Jersey Campaign Contributions and Expenditures Reporting Act, N.J.S.A. 19:44A-1 et seq. and Commission Regulations, N.J.A.C. 19:25-1 et seq.

At its meeting on June 18, 2024, by a vote of 3-0, the Commission found and declared that it is an issue of public importance that must be decided on an emergent basis, and to issue this Order to Show Cause, consider arguments and hold a hearing to evaluate whether a declared gubernatorial candidate's media airtime is an "in-kind" contribution to the candidate's campaign, and, therefore, subject to the applicable requirements for same including contribution limits.

The Order to Show Cause is based, in part, on the following facts and does not concern or create any restriction, limitation, control and/or impairment on, of, or concerning any form of speech, expression, or message content:

1. On June 14, 2024, William G. "Bill" Spadea ("Candidate Spadea") filed Form D-1 to report the establishment of "Spadea for Governor," a single candidate committee for the 2025 gubernatorial primary election;
2. Candidate Spadea hosts a four-hour radio show airing every weekday on New Jersey 101.5, which is owned and operated by Townsquare Media;

3. Upon information and belief, Candidate Spadea's programming and messaging is transmitted and distributed to the general public via airwaves, internet and other forms of media;
4. On June 17, 2024, Candidate Spadea publicly announced his candidacy for the Republican nomination for New Jersey governor;
5. Candidate Spadea is a candidate in the 2025 gubernatorial primary election as defined by N.J.S.A. 19:44A-3c, N.J.A.C. 19:25-1.7 and N.J.A.C. 19:25-16.3;
6. On June 17, 2024, according to press reports, Townsquare Media stated that Candidate Spadea will continue to host and present his show, stating "we have taken steps and imposed guidelines to ensure that Bill's on-air presence over the coming months and until he becomes a legally qualified candidate are in accordance with New Jersey election law, applicable FCC guidance, and industry standards and best practices for such circumstances;"<sup>1</sup>
7. A gubernatorial candidate in the 2025 primary election must not knowingly accept a contribution in excess of \$5,800 from a single source.<sup>2</sup> N.J.S.A. 19:44A-29 and N.J.A.C. 19:25-16.6; and,
8. In-kind contributions are contributions, pursuant to N.J.S.A. 19:44A-3d, N.J.A.C. 19:25-1.7 and N.J.A.C. 19:25-16.3.

IT IS, on this 21th day of June, 2024,

ORDERED that on the 28<sup>th</sup> day of June 2024, at 9:00 AM, Spadea for Governor, Candidate Spadea and Townsquare Media shall appear and show cause before the New Jersey Election Law Enforcement Commission, 25 South Stockton St., 5th Floor, Trenton, NJ 08608, for consideration by the Commission as to why a determination should not be made that the candidate's radio airtime is an in-kind contribution from NJ 101.5 or Townsquare Media and therefore subject to the contribution limit; and it is further

ORDERED that Spadea for Governor, Candidate Spadea and Townsquare Media shall file a written response to this Order to Show Cause with the New Jersey Election Law Enforcement Commission by 5:00 PM on June 24, 2024; and it is further

ORDERED that any 2025 gubernatorial candidate or other interested party who wishes to be heard with respect to the question presented in this Order to Show Cause shall file with the New Jersey Election Law Enforcement Commission any response to this Order to Show Cause by 5:00 PM on June 24, 2024; and it is further

ORDERED that a copy of this Order to Show Cause shall be provided to the State House press corps and submitted to all declared New Jersey gubernatorial candidates; and it is further

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<sup>1</sup> <https://nj1015.com/townsquare-commends-bill-spadeas-civic-engagement-and-commitment-to-public-service/> accessed June 19, 2024.

<sup>2</sup> At its June 18, 2024 meeting, the Commission voted 3-0 to adopt the 2025 Cost Index Report, announcing the adjustment of various gubernatorial thresholds, including the contribution limit, as required by N.J.S.A. 19:44A-7.1.

ORDERED that any 2025 gubernatorial candidate or other interested party may submit briefing not to exceed 8 pages, and may appear and participate in the hearing on the 28<sup>th</sup> day of June, 2024 at 9:00 AM.

Submissions in response to this Order to Show Cause may be delivered to the Commission's offices or via email to Elbia Zeppetelli at [Elbia.Zeppetelli@elec.nj.gov](mailto:Elbia.Zeppetelli@elec.nj.gov).

NEW JERSEY ELECTION LAW  
ENFORCEMENT COMMISSION



Dated: June 21, 2024

BY: \_\_\_\_\_

THOMAS H. PROL  
Chairman

#### CERTIFICATION OF SERVICE

Joseph W. Donohue hereby certifies that on June 21, 2024, he distributed the foregoing Order to Show Cause to the New Jersey State House Press Corps, arranged for it to be posted on the website of the New Jersey Election Law Enforcement Commission, and caused it to be served on the following persons and/or entities:

Spadea for Governor, a single candidate committee for the primary election  
and

William G. "Bill" Spadea  
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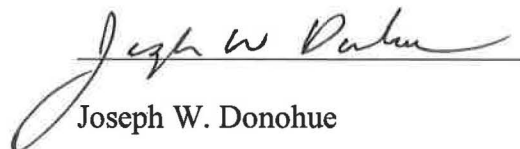
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June 21, 2024

  
Joseph W. Donohue