

# John Paff

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January 20, 2012

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New Jersey Election Law Enforcement Commission

Request for Investigation

P.O. Box 185

Trenton, NJ 08625 (via Fax only to (609-943-5280))

Dear Sir or Madam:

Enclosed are the first three pages of a Form R-1 filed by Cumberland County Freeholder candidate James Dunkins on November 28, 2011. The "Schedule A" forms report \$500 contributions from various individuals but do not report those individual contributor's occupations or employers.

My understanding from reading p. 22 of the March 2011 Compliance Manual for Candidates, is that it is critically important for each individual contributor's employer or source of income to be reported. Further research revealed John Alice of Woodbury, who contributed \$500 on October 24, 2011, is an attorney. Page 22 of the Manual says that the description "attorney" "must be provided and that "the information shall not be blank."

Accordingly, I believe that Mr. Dunkins and/or his campaigned treasurer violated N.J.A.C. 19:25-17.2(c) because these reporting transactions were not reported in the manner established for reporting by the Act. I think that this offense subjects Mr. Dunkins and/or his treasurer to the penalties provided in N.J.S.A. 19:44A-22. I ask that the Commission please file a complaint.

Thank you for your attention to this matter.

Sincerely,



John Paff

FORM R-1	REPORT OF CONTRIBUTIONS AND EXPENDITURES	REPORT (CHECK ONE)
<b>NEW JERSEY ELECTION LAW ENFORCEMENT COMMISSION</b> P O Box 185, Trenton, NJ 08625-0185 (609) 292-8700 or Toll Free Within NJ 1-888-313-ELEC (3532) Web site <a href="http://www.elec.state.nj.us/">http://www.elec.state.nj.us/</a>		<input type="checkbox"/> 29 - DAY PRE-ELECTION <input type="checkbox"/> 11 - DAY PRE-ELECTION <input checked="" type="checkbox"/> 20 - DAY POST-ELECTION <input type="checkbox"/> Apr 15, _____ <input type="checkbox"/> July 15, _____ <input type="checkbox"/> Oct 15, _____ <input type="checkbox"/> Jan 15, _____
CANDIDATE OR COMMITTEE NAME <i>Rev James Dunkins</i>		Amendment Yes <input type="checkbox"/> No <input type="checkbox"/>
STREET ADDRESS <i>451 Lance Ct</i>		
CITY <i>Millville</i>	STATE <i>NJ</i>	ZIP CODE <i>08332</i>
COUNTY <i>Cumberland</i>	ELECTION DISTRICT OR MUNICIPALITY	
POLITICAL PARTY, IF ANY <i>Democrat</i>	OFFICE SOUGHT <i>Freeholder</i>	
ELECTION DATE <i>11/8/11</i>	ELECTION TYPE (CHECK ONE) <input type="checkbox"/> PRIMARY <input type="checkbox"/> MUNICIPAL <input checked="" type="checkbox"/> GENERAL <input type="checkbox"/> RUN-OFF	<input type="checkbox"/> SCHOOL <input type="checkbox"/> SPECIAL <input type="checkbox"/> FIRE DISTRICT
<b>SUMMARY TABLES</b> DO NOT ATTEMPT TO COMPLETE TABLES I AND II UNTIL APPROPRIATE SCHEDULES HAVE BEEN COMPLETED		
<b>TABLE I RECEIPTS</b>		
1 MONETARY CONTRIBUTIONS OF \$300 OR LESS	THIS REPORT	CUMULATIVE TO DATE
2 MONETARY CONTRIBUTIONS IN EXCESS OF \$300 AND ALL CURRENCY CONTRIBUTIONS [Schedule A]	\$ 2,750	\$ 5,350
3 IN-KIND CONTRIBUTIONS OF \$300 OR LESS	\$ 0	\$ 0
4 IN-KIND CONTRIBUTIONS IN EXCESS OF \$300 [Schedule B]	\$ 0	\$ 0
5 LOANS RECEIVED IN EXCESS OF \$300 AND ALL CURRENCY LOANS [Schedule C]	\$ 0	\$ 0
6 SUB TOTAL (ADD LINES 1 THRU 5)	\$ 9,875	\$ 22,975
7 REFUND OF EXCESSIVE CONTRIBUTIONS [Adjustment Schedule] (-)	\$ 0	\$ 0
8 TOTAL CONTRIBUTIONS	\$ 9,875	\$ 22,975
9 ADD FUNDS TRANSFERRED FROM PRIOR CAMPAIGN (+)	\$ 0	\$ 0
10 TOTAL RECEIPTS (ADD LINE 8 + LINE 9)	\$ 9,875	\$ 22,975
<b>TABLE II EXPENDITURES</b>		
1 DISBURSEMENTS - CAMPAIGN EXPENSES [Schedule 1(D)]	\$ 9,948.92	\$ 21,678.77
2 DISBURSEMENTS - OTHER [Schedule 2(D)]	\$ 1,268	\$ 1,268
3 DISBURSEMENTS - CONTRIBUTIONS MADE TO OTHER CANDIDATES/COMMITTEES [Schedule 3(D)]	\$ 0	\$ 0
4 CONTRIBUTIONS MADE ON BEHALF OF OTHERS [Pro Rata Amount Schedules 1(D) and 2(D)]	\$ 0	\$ 0
5 IN-KIND CONTRIBUTIONS OF \$300 OR LESS (TABLE I, LINE 3)	\$ 0	\$ 0
6 IN-KIND CONTRIBUTIONS IN EXCESS OF \$300 (TABLE I, LINE 4)	\$ 0	\$ 0
7 SUB TOTAL (ADD LINES 1 THRU 6)	\$ 11,216.92	\$ 22,946.77
8 REFUNDED DISBURSEMENTS [Schedule F] (-)	\$ 0	\$ 0
9 TOTAL EXPENDITURES (LINE 7 MINUS LINE 8)	\$ 11,216.92	\$ 22,946.77

**SCHEDULE A**

**Monetary Contributions in Excess of \$300 and All Currency Contributions**

CONTRIBUTOR NAME <i>Triad Advisory Services</i>			EMPLOYER NAME	
CONTRIBUTOR ADDRESS <i>1301 W. Forest Grove Rd</i>			EMPLOYER ADDRESS	
<i>Vineland 08360</i>				
	CHECK IF CURRENCY <input type="checkbox"/>	AGGREGATE AMOUNT \$	DATE(S) RECEIVED	AMOUNT(S) RECEIVED THIS PERIOD
OCCUPATION			<i>10-27-11</i>	<i>\$ 500</i>
CONTRIBUTOR NAME <i>Pennon</i>			EMPLOYER NAME	
CONTRIBUTOR ADDRESS <i>3001 Market St</i>			EMPLOYER ADDRESS	
<i>Philadelphia, PA 19104</i>				
	CHECK IF CURRENCY <input type="checkbox"/>	AGGREGATE AMOUNT \$	DATE(S) RECEIVED	AMOUNT(S) RECEIVED THIS PERIOD
OCCUPATION			<i>10-28-11</i>	<i>\$ 2,000</i>
CONTRIBUTOR NAME <i>Lipman Antonelli Batt Gilson</i>			EMPLOYER NAME	
CONTRIBUTOR ADDRESS <i>110 N. 6<sup>th</sup> St</i>			EMPLOYER ADDRESS	
<i>Vineland 08360</i>				
	CHECK IF CURRENCY <input type="checkbox"/>	AGGREGATE AMOUNT \$	DATE(S) RECEIVED	AMOUNT(S) RECEIVED THIS PERIOD
OCCUPATION			<i>10-31-11</i>	<i>\$ 625</i>
CONTRIBUTOR NAME <i>Anthony McPae</i>			EMPLOYER NAME	
CONTRIBUTOR ADDRESS <i>47 Gill Rd</i>			EMPLOYER ADDRESS	
<i>Haddonfield 08033</i>				
	CHECK IF CURRENCY <input type="checkbox"/>	AGGREGATE AMOUNT \$	DATE(S) RECEIVED	AMOUNT(S) RECEIVED THIS PERIOD
OCCUPATION			<i>11-3-11</i>	<i>\$ 500</i>
CONTRIBUTOR NAME <i>Craig Memington</i>			EMPLOYER NAME	
CONTRIBUTOR ADDRESS <i>47 Gill Rd</i>			EMPLOYER ADDRESS	
<i>Haddonfield 08033</i>				
	CHECK IF CURRENCY <input type="checkbox"/>	AGGREGATE AMOUNT \$	DATE(S) RECEIVED	AMOUNT(S) RECEIVED THIS PERIOD
OCCUPATION			<i>11-3-11</i>	<i>\$ 500</i>
(COMPLETE THIS LINE FOR EVERY PAGE USED)			TOTAL, THIS PAGE	<i>\$ 4,125</i>
(COMPLETE THIS LINE FOR LAST PAGE USED)			GRAND TOTAL	<i>\$ 7,125</i>

**SCHEDULE A**

**Monetary Contributions in Excess of \$300 and All Currency Contributions**

CONTRIBUTOR NAME <i>Robinson + Andujar</i>			EMPLOYER NAME	
CONTRIBUTOR ADDRESS <i>2057 Wheaton Ave., PO Box 788</i>			EMPLOYER ADDRESS	
<i>Millville, 08332</i>				
	CHECK IF CURRENCY <input type="checkbox"/>	AGGREGATE AMOUNT \$	DATE(S) RECEIVED <i>11-4-11</i>	AMOUNT(S) RECEIVED THIS PERIOD <i>\$ 500</i>
OCCUPATION				
CONTRIBUTOR NAME <i>Long Marmero</i>			EMPLOYER NAME	
CONTRIBUTOR ADDRESS <i>44 Euclid St</i>			EMPLOYER ADDRESS	
<i>Woodbury NJ 08096</i>				
	CHECK IF CURRENCY <input type="checkbox"/>	AGGREGATE AMOUNT \$	DATE(S) RECEIVED <i>11-7-11</i>	AMOUNT(S) RECEIVED THIS PERIOD <i>\$ 2,500</i>
OCCUPATION				
CONTRIBUTOR NAME			EMPLOYER NAME	
CONTRIBUTOR ADDRESS			EMPLOYER ADDRESS	
	CHECK IF CURRENCY <input type="checkbox"/>	AGGREGATE AMOUNT \$	DATE(S) RECEIVED	AMOUNT(S) RECEIVED THIS PERIOD \$
OCCUPATION				
CONTRIBUTOR NAME			EMPLOYER NAME	
CONTRIBUTOR ADDRESS			EMPLOYER ADDRESS	
	CHECK IF CURRENCY <input type="checkbox"/>	AGGREGATE AMOUNT \$	DATE(S) RECEIVED	AMOUNT(S) RECEIVED THIS PERIOD \$
OCCUPATION				
CONTRIBUTOR NAME			EMPLOYER NAME	
CONTRIBUTOR ADDRESS			EMPLOYER ADDRESS	
	CHECK IF CURRENCY <input type="checkbox"/>	AGGREGATE AMOUNT \$	DATE(S) RECEIVED	AMOUNT(S) RECEIVED THIS PERIOD \$
OCCUPATION				
<b>(COMPLETE THIS LINE FOR EVERY PAGE USED)</b>			<b>TOTAL, THIS PAGE</b>	<i>\$ 3000</i>
<b>(COMPLETE THIS LINE FOR LAST PAGE USED)</b>			<b>GRAND TOTAL</b>	<i>\$ 7,125</i>



State of New Jersey

ELECTION LAW ENFORCEMENT COMMISSION

RONALD DEFILIPPIS  
Chairman

WALTER F. TIMPONE  
Vice Chairman

AMOS C. SAUNDERS  
Commissioner

Respond to:  
P.O. Box 185  
Trenton, New Jersey 08625-0185

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

Website: <http://www.elec.state.nj.us/>

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Compliance Director

JAMES P. WYSE  
Legal Counsel

May 2, 2012

John Paff  
P.O. Box 5424  
Somerset, N.J. 08875-5424

Dear Mr. Paff:

The Election Law Enforcement Commission ("the Commission") has completed its preliminary review of your Request for Investigation received March 12, 2012 relevant to the filing requirements of James Dunkins, a candidate for County Freeholder in Cumberland County in the 2011 general election. You alleged that the candidate failed to disclose complete contribution information on his campaign reports.

At its meeting on April 10, 2012, the Commission determined **not** to open a review for compliance with the provisions of the New Jersey Campaign Contributions and Expenditures Reporting Act, N.J.S.A. 19:44A-1 et seq.

The Commission staff would like to thank you for the opportunity to present your request and appreciates your interest in the work of the Commission. If you have any further questions or concerns regarding this matter, you may contact me at (609) 777-1446.

Sincerely,  
Election Law Enforcement Commission

By:   
Shreve E. Marshall, Jr.  
Director of Review & Investigation

SEM/cg