

January 28, 2025

New Jersey Election Law Enforcement Commission  
25 S Stockton Street  
Trenton, NJ 08608

**Re: Request For An Investigation Into Bill Spadea For Governor And Townsquare Media, Inc.**

Commissioners:

This firm represents gubernatorial candidate Jack Ciattarelli and his candidate committee Ciattarelli for Governor (collectively “Ciattarelli”). I write to demand that the Commission undertake an immediate investigation into the unlawful excess expenditures Townsquare Media, Inc. and NJ101.5 (collectively “Townsquare”) continue to make in coordination with and on behalf Bill Spadea and his candidate committee, Spadea for Governor (collectively “Spadea”). The value of Townsquare’s aid to Spadea’s candidacy far exceeds the contribution limits for gubernatorial candidates. Indeed, it is fairly estimated to be in the hundreds of thousands of dollars. Moreover, Spadea and Townsquare knowingly engaged in this conduct. Their intentional circumvention of the contribution limits and their actions in light of the Commission’s admonitions earlier this year should preclude Spadea from receiving matching funds.

In July when the Commission issued its Order to Show Cause, Townsquare advised the Commission that it “does not provide Spadea with airtime as a means for him to promote his candidacy, advocate for the defeat of political opponents, or otherwise conduct campaign related activities.” Townsquare further assured the Commission that it was putting in place guidelines that “have been meticulously designed to prevent any potential misuse of the broadcast platform for campaign purposes.” According to Townsquare, “[t]he primary objective is to prevent the use of Spadea’s broadcast platform to advance his candidacy.” Townsquare promised that it would “remain neutral.” It promised the Commission that “[c]ontent and segments will be regularly

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reviewed with Townsquare's legal department to ensure ongoing compliance." As set forth in detail below, Spadea and Townsquare misled the Commission on all fronts. Given the myriad examples of Spadea using Townsquare's platform to advance his candidacy and campaign, it is clear that Townsquare did nothing to ensure compliance. Instead, Townsquare put its finger on the scale using the broad reach of its broadcasts, social media platforms and public events to advance Spadea's campaign. It provided Spadea with a platform to raise his name ID as a candidate, promote his candidacy, curry favor with key party leaders and donors, push his political agenda, and attack his opponents. It did it all in coordination with Spadea and his campaign. The Commission must act to prevent this unlawful aid to Spadea's campaign from impacting the Republican gubernatorial primary.

The evidence demonstrates that Townsquare and Spadea conspired and coordinated to use the radio station and its online platforms to boost Spadea's name ID as a gubernatorial candidate. They created an unwarranted "disclaimer" to apprise listeners that Spadea is a gubernatorial candidate for this explicit purpose. They use NJ101.5's public events for the same purpose. In addition, they use them to host Republican officials and donors to curry favor and support for Spadea in the primary and the various county conventions. Spadea's campaign manager is shown on NJ101.5's own videos attending these events. They even went so far as to make Spadea's Townsquare sponsored podcast indistinguishable from the various advocacy organizations and PACs supporting Spadea's campaign. In addition, Spadea's campaign website and social media feeds are intertwined with NJ101.5's website and social media. In fact, NJ101.5 took affirmative steps to remove or delete content that previously appeared on its online platforms that could have been used by Spadea's opponents to attack him. Townsquare also promotes pieces on its online platforms that are tied to the Spadea campaign's messaging pushing back against the attacks of his opponents and attacking his opponents. Spadea then uses the Townsquare promoted pieces for his campaign all without having to expend campaign dollars to do so. Finally, despite feigned indignation that it would ever allow such a thing to happen, Spadea attacks his opponents on air, on Townsquare's social media platforms and on his podcast with the full knowledge and acquiescence of Townsquare.

Townsquare's actions were undertaken for the express purpose of providing a benefit to Spadea's campaign and they achieved their result as Spadea's campaign consultant bragged just a month ago. As such, Townsquare's coordinated aid to the Spadea campaign constitutes unlawful contributions. The Commission should punish this brazen effort to circumvent the contribution and

expenditure limits. The only meaningful punishment is to deny Spadea access to public matching funds and impose significant fines on Townsquare.

### **The “Disclaimer”**

Multiple times a day for the past six plus months, Townsquare ran a “disclaimer” on Spadea’s radio show and his podcast reminding voters that Bill Spadea is a candidate for Governor. Fully aware that if they directly advocate for Spadea’s election they run afoul of the definition of political communication contribution, Spadea and Townsquare conspired to find a way to provide value to the Spadea campaign by reminding thousands of listeners and legal voters daily that Spadea is a candidate for Governor. This “disclaimer” serves no legitimate purpose other than to make the public aware that Spadea is running for Governor. It is not legally required nor was it requested by the Commission. Instead, Spadea and Townsquare viewed it as their only means to promote his image and candidacy by making the public aware that Bill Spadea is running for Governor. It also has the practical effect of boosting his name ID. Leaving nothing to chance, they then made the disclaimer 53 seconds long with multiple references to Bill Spadea’s political objective of being Governor. Again, this was done for the sole purpose of advancing Spadea’s campaign.

The “disclaimer” reads:

Townsquare Media, and New Jersey 101.5 do not support, endorse, advocate, encourage, fund or appeal for the election or defeat of any candidates for public office including **Bill Spadea specifically, who has announced his intention to run for the Office of Governor of New Jersey**. Townsquare Media, its affiliates, executives, officers, agents and employees, including New Jersey 101.5 did not request, suggest, invite or encourage **Bill Spadea to decide to seek to become a legally qualified candidate for the Office of Governor of New Jersey**. As a result of **Mr. Spadea’s decision to run for Governor**, Townsquare Media and New Jersey 101.5 have implemented parameters, restrictions and guidelines on the content of this broadcast to eliminate any communication and broadcast of any content endorsing, supporting, encouraging, advocating, promoting or appealing for the nomination, election or defeat of **any candidates for public office, and in particular Bill Spadea**.

(emphasis added).

There is no legitimate reason for the “disclaimer” or references to Spadea’s candidacy appearing on the radio or on his podcast. As Spadea and Townsquare argued previously, Spadea remaining on the air without mentioning that he is a gubernatorial candidate or using it to discuss his platform as a candidate or advocate for his election did not result in a contribution by Townsquare. However, simply ignoring Spadea’s candidacy did not further the interests of Spadea, his campaign or Townsquare. Accordingly, they set out to boost Spadea’s name ID as a candidate for Governor by manufacturing a “disclaimer” solely for the purpose of telling voters multiple times a day that Spadea is a candidate for Governor. Other candidates must expend vast sums of valuable campaign dollars to increase their name ID and remind voters they are a candidate for Governor. Not Spadea. Townsquare did that for him by using valuable airtime multiple times a day to remind listeners/voters that Spadea is not just a radio jockey or podcast host, but he is a candidate for Governor as well. In doing so, Townsquare contributed to Spadea by providing an “other thing of value” in the form a “disclaimer” that sucks up \$500 per minute airtime informing voters that he was a candidate for Governor. This is unquestionably a contribution.<sup>1</sup> See AO 01-2023 (“You indicate that your Senate committee will make coordinated expenditures supporting your gubernatorial candidate committee by using your image and directly promoting your candidacy in the same geographic area as your gubernatorial campaign. Coordinated expenditures benefiting a candidate are in-kind contributions to the candidate receiving the benefit and must be reported as such. N.J.A.C. 19:25-10.4(a), 19:25-10.10(a) and 19:25-10.11(b)...The communications you describe will be contributions to your gubernatorial candidate committee”).<sup>2</sup>

Lest the Commission think it is just speculation on the part of Ciattarelli that the actions of Spadea and Townsquare provided a discernible benefit to Spadea’s campaign, the Spadea campaign itself released an internal poll showing that Spadea’s name ID “steadily increased” as he and Townsquare reminded voters listening to his radio show that he is a candidate for Governor. See “Spadea gaining in Name ID among GOP primary voters, internal poll shows” [Spadea gaining in](#)

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<sup>1</sup> If Spadea himself were to speak for 53 seconds multiple times a day advising voters that he was a candidate for Governor, the Commission would undoubtedly call that airtime a contribution as an “other thing of value”. The fact that Townsquare is the one advising voters, does not change the conclusion. It is a coordinated expenditure and a contribution.

<sup>2</sup> There is no meaningful distinction between what was proposed in AO 01-2023 and what Townsquare is doing for Spadea. The Commission left no doubt that the requestor in AO 01-2023 could not undertake the contemplated activity. There is no basis to alter that conclusion for Spadea.

[name ID among GOP primary voters, internal poll shows - New Jersey Globe](#). In fact, Spadea's consultant Bill Stepien bragged that "Spadea's positive growth ... **has occurred with minimal advertising spend to fuel the increase.**" *Id.* This is a smoking gun showing that the increase in Spadea's name ID is the result of the exorbitant coordinated spending by Townsquare to increase Spadea's name ID. It also saved Spadea from using valuable campaign resources to raise his name ID as a gubernatorial candidate.

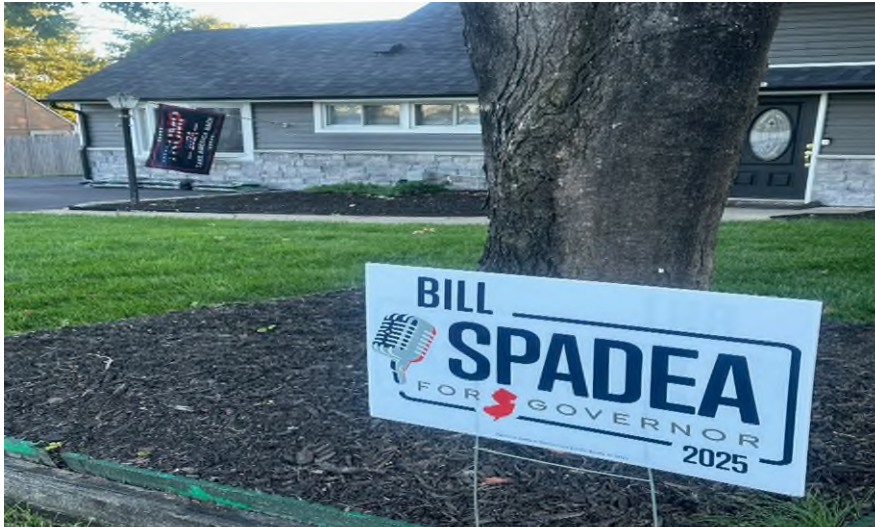
N.J.A.C. 19:25-1.7 defines "contribution" as including "any other thing of value, including any in-kind contribution." Here, Townsquare provided extremely valuable airtime to increase Spadea's name ID by repeatedly reminding listeners that Spadea is a candidate for Governor when there is no legitimate reason for doing so. A study by the Research on Individuals, Politics & Society Laboratory at Vanderbilt University and The Omnibus Project at UC Davis found that "individuals not only favor candidates with more familiar names, but also perceive candidates with more familiar names to be more viable." [Why tech-savvy political candidates still need old-fashioned yard signs | Vanderbilt University](#) "Our study offers fairly conclusive evidence that, in low information races, a candidate's name recognition positively affects voter support."<sup>3</sup> That is why Spadea and Townsquare concocted this unnecessary "disclaimer", to increase Spadea's name ID to benefit his campaign with, as Mr. Stepien put it, "minimal advertising spend." In short, it acts as a daily lawn sign broadcast to listeners reminding them that Spadea is a candidate for Governor. According to Spadea's own campaign these expenditures provided the intended benefit. Further, Spadea and Townsquare cannot be heard to suggest that the increase in Spadea's name ID is solely the result of his being on the air as a radio jockey. As they pointed out at the Order to Show Cause hearing, Spadea has been on the air for years. Despite this, his name ID was in the single digits among voters. The poll touted by the Spadea campaign shows that his name ID did not really increase until Townsquare spent a fortune in airtime running a "disclaimer" informing voters that Spadea is a candidate for Governor.

Townsquare's expenditures in the form of valuable airtime – airtime it proposed to charge Ciattarelli \$500 a minute for – to inform or remind voters that Spadea is a candidate for Governor

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<sup>3</sup> A review of political consultants' websites also shows the benefit name ID with each advocating ways to increase name ID to win elections. [How to Build Name ID - Majority Strategies](#); [A Guide to Raising Your Name ID - Local Victory](#); [Name ID and Why It Matters — HashtagPinpoint](#); [Social Media: A Candidate's Path to Increase Name Recognition - Political Hype](#); [SOCIAL MEDIA: A Candidate's Path to Increase Name Recognition](#);

meets the definition of a contribution under *N.J.A.C. 19:25-1.7*. It is an “other thing of value” designed to boost his name ID, much in the way Spadea’s lawn signs are an expenditure designed to boost his name ID. Notably, neither contains an express appeal to vote for Spadea. Instead, they simply advise the voting public that Spadea is a candidate for Governor.



The Commission has previously acknowledged that coordinated expenditures promoting a candidacy to increase name ID, even without express advocacy constitute a contribution and are subject to the expenditure cap. See Advisory Opinion 01-2023. There, gubernatorial candidate Steven Fulop asked if his senate campaign could expend monies to promote his image and candidacy with the “practical effect of building [your] name recognition.” Writing for the Commission, now-Executive Director Haines very clearly advised Mayor Fulop that coordinated expenditures made to promote a candidate’s image and candidacy constituted a contribution and were subject to the contribution limits and the expenditure limits. *Id.* There is no distinction between what Mayor Fulop proposed and what Townsquare and Spadea have done here with the “disclaimer” to boost Spadea’s name ID. Fulop’s question involved expenditures made before he applied for matching funds or became a “legally qualified” candidate for Governor just like Townsquare and Spadea coordinated expenditures did. The Commission very clearly advised Fulop that such expenditures were contributions and there is no basis for altering that conclusion here.

Further, Townsquare’s contribution of valuable radio time to increase Spadea’s name ID does not fall within the exception to the definition of “expenditure” as the “disclaimer” is neither a news story,

commentary, or editorial. Instead, it is a naked attempt to circumvent contribution limits by using Townsquare's \$500 a minute airtime to increase Spadea's name ID and allow him to avoid spending campaign dollars to increase his name ID at a time when he is struggling to raise legitimate contributions. Remarkably, the Spadea campaign admitted the benefit of their coordinated plan not only for boosting his name ID, but as a means of saving the flagging campaign from having to spend its limited funds.<sup>4</sup>

### **The "Disclaimer" Post January 1, 2025**

Prior to January 1, 2025, Spadea and Townsquare's use of the disclaimer was an "other thing of value" used to boost his name ID. After January 1, 2025, it also became a "political communication contribution." *N.J.A.C. 19:25-10.10(b)* sets forth a straightforward test for "political communication contributions" post January 1 in the year of a gubernatorial election. It provides that a "broadcast matter or statement or communication...delivered or accessed by electronic means, including but not limited to the internet, that does not contain an explicit appeal pursuant to (a) above for the nomination for election or for the election or defeat of a candidate shall be deemed to be a political communication if it meets the following conditions:...in the case of a candidate for nomination for the office of Governor in a primary election, the period of time that a communication shall be deemed political shall be on or after January 1st in a year in which a primary election for Governor is being conducted..." *Id.* The communication must also be "circulated or broadcast to an audience substantially comprised of persons eligible to vote for the candidate on whose behalf the communication was made." *Id.* It also requires that "[t]he communication contains a statement or reference concerning the governmental or political objectives or achievements of the candidate." Finally, it requires that the broadcast was made with the cooperation or prior consent of the candidate. *Id.*

Spadea recently announced that he is going to step off the air on January 30, 2025. That means the "disclaimer" designed to boost his name ID will have been on the air and republished on Townsquare's website and other social media platforms for streaming for a period of 30 days this year.<sup>5</sup> Each airing of that 53 second "disclaimer" from January 1 through January 30, 2025,

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<sup>4</sup> Spadea has raised less than his opponents in the Republican primary. [pr\\_01162025.pdf](#). In fact, only one candidate for Governor who has filed reports with the Commission raised less than Spadea and that candidate is not running in the Republican primary.

<sup>5</sup> To the extent Spadea's show remains available for streaming after January 30, 2025, each additional day should be considered a political communication contribution as well.

constitutes a political communication contribution. Those broadcasts all took place after January 1, 2025. They were broadcast to an audience substantially comprised of people eligible to vote for Spadea. After all, NJ 101.5 sells itself as the New Jersey radio station, not New York and not Philadelphia. The “disclaimer” mentions the candidate, Spadea, by name and makes specific reference to his political objective of being Governor of the State of New Jersey. In fact, Townsquare and Spadea went out of their way to refer four separate times in the near-minute-long “disclaimer” to Spadea’s political objective.<sup>6</sup> Finally, there can be no question that the airing of the “disclaimer” was done with the cooperation and/or prior consent of Spadea.

Based on the foregoing, each airing of the disclaimer after January 1, 2025, should be treated by the Commission as a “political communication contribution.” The cumulative effect of running this political communication contribution multiple times a day for 30 days is a contribution that far exceeds Townsquare’s lawful contribution limit to Spadea. Indeed, it is easily valued in excess of \$100,000 between the radio show, streaming and the podcast. Not to mention the social media platforms. Again, the Commission has already addressed this issue when it advised Mayor Fulop he could not undertake the same activity in AO 01-2023. There is no distinction between Fulop’s proposed coordinated expenditures to boost his image and name ID and those made by Townsquare. Townsquare created the disclaimer for the express purpose of boosting Spadea’s name ID as a candidate. There is no other justifiable reason for the “disclaimer.”

### **The Common Ground Podcast**

In addition to his radio show, Spadea hosts a podcast sponsored by Townsquare called “Common Ground with Bill Spadea”. This podcast shares a name and uses a remarkably similar logo to the various issue advocacy organizations and PACs Spadea created that continue to support his political aspirations: Common Sense Club, Inc., Common Sense New Jersey, Common Sense Wins and Elect Common Sense. It is unclear what distance, if any, Spadea has put between himself and these entities as he campaigns for Governor. However, what is clear is that there is no distance between Townsquare and these entities.

The Townsquare sponsored podcast “Common Ground with Bill Spadea” uses footage and photos from some or all of these Spadea entities in its promo and sizzle reel. In fact, a simple

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<sup>6</sup> As discussed below, Spadea also spends a considerable amount of time using Townsquare resources to discuss his political positions and to mirror his campaign’s attacks on his primary opponents.

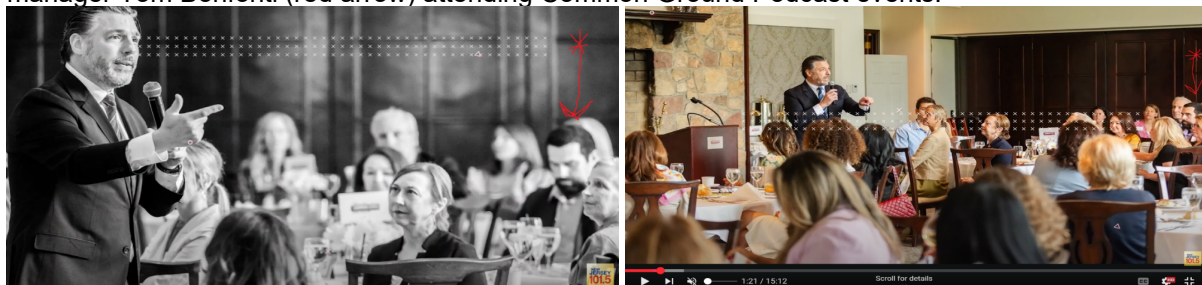


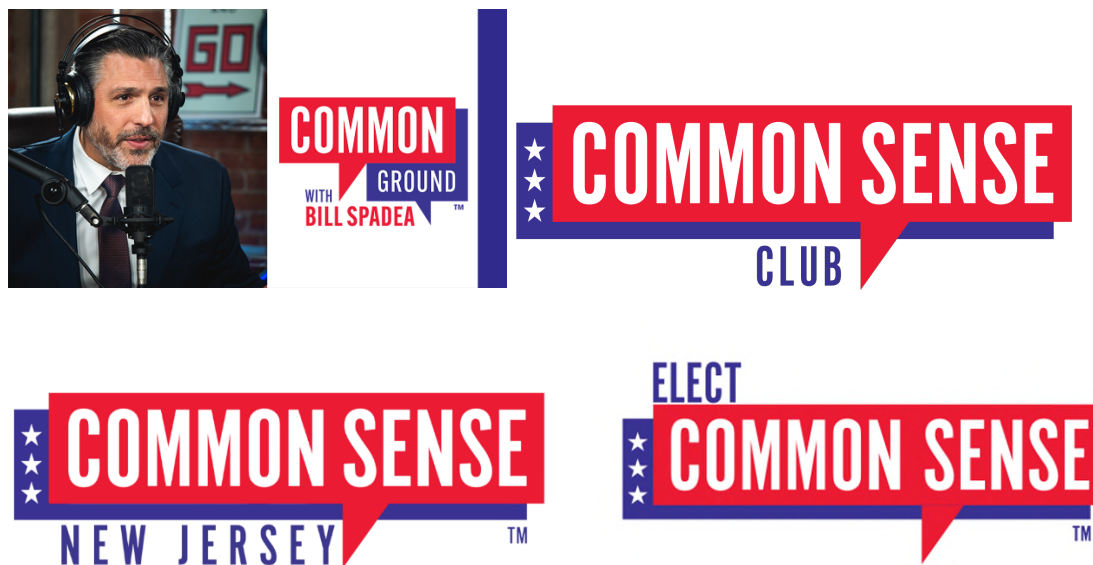
review the podcast on NJ101.5's YouTube page shows that every podcast is video recorded and begins with the "disclaimer" repeatedly reminding or advising online viewers that Bill Spadea is a candidate for Governor.<sup>7</sup> Again, this reminder to boost Spadea's name ID is a contribution and should be treated as such. Upon conclusion of the **53 second** "disclaimer", Townsquare shows a 44 second sizzle reel that is replete with references to "Common Sense" not "Common Ground" and shows Spadea hosting Common Sense Club and related entity events attended by his campaign manager, Tom Bonfonti.<sup>8</sup> In fact, there does not appear to be a single NJ101.5 event shown in the sizzle reel. Instead, every event shown is a "Common Sense" event organized by one or more of the "independent" entities supporting Spadea's candidacy. If you pay even the slightest bit of attention, you can see Spadea speaking in front of Elect Trump and Impeach Biden signs in the sizzle reel. This sizzle reel is not promoting the podcast, it is promoting Bill Spadea as a candidate and his affiliated political organizations. Again, it runs at the start of every podcast right after the "disclaimer" in another attempt to convince voters that Spadea is a candidate for Governor and supporter of President Trump (despite numerous audio and video clips circulating online of Spadea being harshly critical of Trump after the 2020 election). Further, it is all done using Townsquare resources.

Below are the logos of the various Spadea "Common Sense" entities and the Townsquare "Common Ground" podcast. It certainly appears that Townsquare went out of its way to align its sponsored podcast with the various "independent expenditure" entities supporting Spadea's campaign.

<sup>7</sup> <https://www.youtube.com/watch?v=O2z5PC2PdbM&list=PLBHzevYnbumtK-nprHkD9fR8yW1VWc1Ua>

<sup>8</sup> Screen captures from the Common Ground podcast sizzle reel showing Spadea for Governor campaign manager Tom Bonfonti (red arrow) attending Common Ground Podcast events.





To that end, the Townsquare funded podcast also holds events at locations around the state all paid for by Townsquare. From the rental of the location to the food, to staging etc., Townsquare pays for it all. At these events, Spadea hosts local elected officials, almost exclusively Republican. Spadea is promoting these officials and candidates at the same time he is seeking their endorsement and support for his candidacy. Further, he is doing it not on his campaign committee's dime, but on the dime of Townsquare. Every other candidate in the race, whether on the Democrat side or the Republican side is forced to use valuable campaign dollars to promote and support other candidates while seeking their endorsement. However, Spadea is doing it all without spending a single campaign dollar. Again, the podcast with its "disclaimer" and sizzle reel showing Spadea campaign events is a contribution to Spadea's campaign both as "an other thing of value" prior to January 1, 2025, and as a "political communication contribution" post January 1, 2025.

Spadea uses the podcast as a means to curry favor with elected officials or candidates in the hopes they will endorse him or support him at the various county conventions. For example, Spadea recently hosted State Senator Carmen Amato from Ocean County on the podcast. Senator Amato is a Spadea supporter and a past member of the Ocean County Screening Committee. Senator Amato will also have a vote in the Ocean County Convention as a member of the County Council which makes endorsements for the Ocean County GOP. <https://www.youtube.com/watch?v=sKGM7w-BKuc&list=PLBHzevYnbumtK-nprHkD9fR8yW1VWc1Ua&index=3> In the video you can see signs for Senator Amato and his

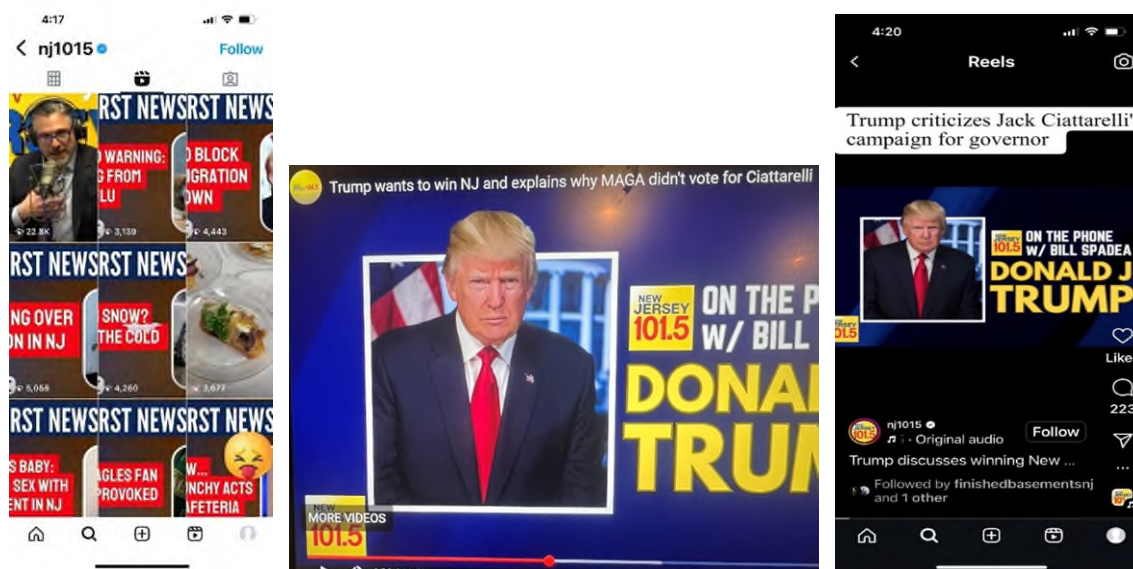
running mates. Not surprisingly, on January 23, 2025, Senator Amato and his running mates endorsed Bill Spadea in the Republican primary. <https://newjerseyglobe.com/governor/ocean-legislators-go-for-spadea-ciattarelli-adds-support-in-monmouth/> Similarly, Spadea hosted Florham Park Mayor Mark Taylor, his biggest supporter in Morris County where Spadea will also be seeking the endorsement of the County Committee. [Bill Spadea: Strong community in East Hanover](#). He also recently hosted Rosy Thakkar, a leader of the Montgomery Township GOP, a member of the Somerset County GOP and a key Spadea ally in Somerset County, on the podcast. <https://www.youtube.com/watch?v=mn-XldkMwQM&list=PLBHzevYnbumtK-nprHkD9fR8yW1VWc1Ua&index=6>. Since he announced his candidacy Spadea has been highlighting Republicans he seeks support from as part of his primary battle and his battle for support at county conventions. There are countless more examples that can be found just by reviewing his podcast. His podcast's focus on these individuals is no coincidence. It is part of a concerted effort to use Townsquare's resources to benefit Spadea's campaign. Any other candidate would be forced to spend valuable campaign resources to seek the support of these individuals and attend their events. Spadea, however, is doing it all on Townsquare's dime by promoting these individuals in exchange for support for his candidacy.

Again, these are coordinated expenditures by Townsquare to boost Spadea's campaign. Matching the podcast logo to the independent expenditure entities supporting Spadea, the "disclaimer", interviews highlighting Spadea supporters and those he's seeking support from, it is all part of a coordinated effort to boost his image and his candidacy and as such is a contribution and subject to the expenditure limit.

### **Townsquare Redefines "Neutral"**

In July, Townsquare pledged to this Commission that it would "remain neutral with respect to a Spadea candidacy." Apparently Townsquare is unaware of the definition of "neutral". Merriam-Webster defines "neutral" as "not engaged on either side." Townsquare is clearly engaged on the side of Spadea. In addition to the coordinated "disclaimer" to boost Spadea's name ID and its alignment of the Townsquare podcast with independent expenditure entities and PACs supporting Spadea, Townsquare uses its social media pages to defend Spadea, to thwart attacks by his opponents and has even taken affirmative steps to hide materials that are viewed as harmful to Spadea all while promoting materials that are viewed as beneficial to him. Further, it has published and republished Spadea's attacks on his opponents, including Ciattarelli as recently as last month.

For example, in November, an independent expenditure entity, raised questions about Spadea's support for President Trump by airing clips of Spadea repeatedly attacking President Trump from 2020 onward. Shortly thereafter, NJ101.5's Instagram account responded by reposting Spadea's five-month-old interview of President Trump from May 10, 2024, where they specifically discuss Ciattarelli's 2021 gubernatorial campaign. Not only did NJ101.5's Instagram account repost the outdated video, but it pinned it as the first reel on its Instagram reels page thereby increasing its views and engagement. Townsquare also edited the header of the video to read: **"Trump criticizes Jack Ciattarelli's campaign for governor."** (emphasis added). The screen shots below show Townsquare pinning a five-month-old video ahead of all recent news and the change to the header to read as though Trump was criticizing Ciattarelli's current gubernatorial campaign.



Townsquare did not stop there. It also pinned the video to the top of its Facebook reels page, again to increase engagement and views in a transparent attempt by Spadea and Townsquare to cover Spadea's attacks on Trump and to fool voters into believing this is new and Trump is attacking Ciattarelli's 2025 campaign. Neutral does not include reposting and pinning outdated videos/interviews with rewritten headers in response to attack ads aimed at Spadea. Spadea then followed Townsquare's lead by responding to the IE entity's attacks on X (formerly Twitter) with a link to the NJ101.5 website and the re-dated interview with President Trump driving voters to content favorable to him while attacking Ciattarelli.

<https://x.com/BillSpadea/status/1865843311849635843>

<https://x.com/BillSpadea/status/1864075519639065051>

Not surprisingly, this is not the first time that Townsquare took affirmative steps to come to Spadea's rescue. In September 2024 when Spadea was again under attack with questions about his support for President Trump and a variety of other topics, Townsquare produced and reposted four-year-old snippets of interviews of Trump by Spadea. The original snippet was from May 15, 2020, but was reposted by Townsquare on its YouTube channel on September 24, 2024. Remarkably, no other host on NJ101.5 has had such outdated content reposted and pinned by Townsquare. <https://www.youtube.com/watch?v=YFvBGjiT0uI> Townsquare acted intentionally in reposting outdated material to defend Spadea from attacks over his years-long rants against President Trump.<sup>9</sup> This is precisely what Townsquare promised the Commission it would not do.

In November of 2024, various clips of Spadea calling for amnesty for illegal immigrants began circulating online. Townsquare immediately jumped to Spadea's defense. It published a tweet on X linking to a column written by Spadea in March of 2024, but now dated November 27, 2024, in effort to mitigate the fallout from the Spadea amnesty clips.<sup>10</sup> <https://t.co/5HU0xQh5ys> In that same column that Townsquare republished and re-dated months after the Order to Show Cause, Spadea attacks Ciattarelli and Senator Jon Bramnick another Republican candidate for Governor as bearing the blame for illegal immigration and remarkably, even terrorism. The Spadea article even uses photos of Ciattarelli and Bramnick as part of the attack. The column then goes on to discuss the policies Spadea will be advocating for if elected Governor. This is the antithesis of neutral.

Uncertain Townsquare's efforts were sufficient, Spadea then reposted/retweeted the column from his X (formerly Twitter) account that he uses for his campaign.

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<sup>9</sup> Perhaps it is possible Spadea has the ability to re-date, re-post and pin these videos on Townsquare's social media pages, however, if that is the case, Townsquare has absolutely failed in policing its guidelines and its resources are still being used to benefit Spadea. Further it would appear Townsquare mislead the Commission about the oversight it would exert on Spadea and his campaign.

<sup>10</sup> The link above shows "This article was originally published in March of 2024" but is re-dated as September 24, 2024.





The coordination between Spadea and Townsquare in republishing and reposting/retweeting this article to push back on Spadea's critics and to attack his primary opponents was so egregious that various online commentators including Assemblyman Brian Bergen noted it and questioned the legality of Townsquare's actions. <https://x.com/votebergen/status/1861974749670236542>

Of course, Townsquare is not only republishing, re-dating and pinning aged material to help Spadea respond to attacks.<sup>11</sup> It is also taking affirmative steps to remove content deemed harmful to Spadea's candidacy. It is no secret that President Trump could play a significant role in the Republican primary. It is also no secret that President Trump has an active dislike for former Governor Christie. In 2023, Spadea interviewed Governor Christie and had positive things to say about his campaign for President when he was running against President Trump. This was in the wake of Spadea repeatedly suggesting President Trump failed as President and should not run again. The entire segment including the Christie portion of the interview was twenty-two minutes and twenty seconds long (22:20) as this screen capture shows.

## Videos



### Christie w/ Bill Spadea

New Jersey 101.5  
Was live · 1.6K views

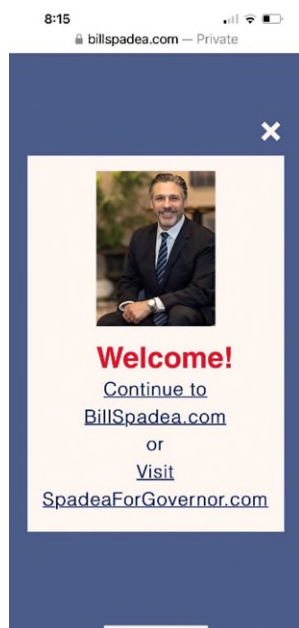
<sup>11</sup> Notably, no other radio show or host appears to have outdated material republished, re-dated or pinned like Spadea does. Further evidence that Townsquare is acting as anything but neutral.

Miraculously, the segment that remains on Townsquare's Facebook and YouTube pages cuts off at 11:29 just as Spadea introduces a poll about Christie's presidential campaign and immediately before Spadea praises Christie's campaign against President Trump. [\(1\) Facebook Live | Facebook](#) From 11:29 to 11:56 there is no audio and the media player just buffers. There is no link anywhere on NJ101.5's social media platforms to that portion of the interview with Governor Christie after 11:29. Indeed, all other references, links etc. to the segment and Spadea's praise of Christie's campaign against Trump were removed from Townsquare's social media. Much like Colonel Jessup did with the infamous flight in "A Few Good Men", Townsquare simply made Spadea's praise for Christie's presidential campaign against President Trump disappear. It appears that neither Spadea nor Townsquare can handle the truth.

Townsquare's actions in coordinating with Spadea to post material to address attacks on Spadea and by removing material harmful to Spadea constitute a contribution to Spadea. Further, those actions demonstrate that contrary to Townsquare's representations to the Commission in July, it has not remained "neutral" in the Republican primary. Instead, it has used its broadcasts, podcasts and various social media accounts to benefit Spadea and harm his opponents. Again, every other candidate for Governor, both Democrat and Republican, would need to use campaign resources to grow and manage its social media pages and other online platforms, and to promote content. Instead, Spadea is doing through coordination with Townsquare using Townsquare's resources.

### **Billspadea.com**

In addition to promoting Bill Spadea as a candidate for Governor, Townsquare promotes Billspadea.com in every Common Ground podcast and elsewhere on its social media platforms. For months now, the [www.BillSpadea.com](http://www.BillSpadea.com) landing page asks visitors if they wish to continue to [www.BillSpadea.com](http://www.BillSpadea.com) or if they wish to visit [www.SpadeaforGovernor.com](http://www.SpadeaforGovernor.com).



That's right, "neutral" Townsquare is directing traffic through its broadcasts and all the various NJ101.5 social media accounts and its Common Ground podcast to a landing page that asks visitors if they want to visit the Spadea for Governor website. No other candidate is being offered the opportunity to have NJ101.5 link to their campaign websites. Again, this is another example of Townsquare and Spadea coordinating to provide a clear benefit to Spadea's gubernatorial campaign. This constitutes a contribution plain and simple. A contribution that Spadea is not reporting and coupled with the other contributions by Townsquare, one that far exceeds the contribution limits applicable to the gubernatorial race.

### **A Complete Lack of Oversight**

Despite promises that Townsquare would be closely monitoring Spadea and that he would not be allowed to advance his campaign and attack his opponents, he's been free to do so with no apparent oversight by Townsquare. Aside from the instances set forth above showing him attacking his opponents and Townsquare reposting and pinning those attacks, it is also worth noting that while a variety of Spadea's articles, podcasts and interviews were scrubbed from the Townsquare social media platforms – Spadea now has considerably less historic content available than other show hosts – all of Spadea's articles and comments attacking Ciattarelli from prior to Spadea's announcement remain on the Townsquare social media platforms.



However, recent attacks also appear on Townsquare's broadcasts and social media platforms. Spadea and his callers continue to attack his opponents and use his radio show to further his campaign messaging. On December 20, 2024, a Spadea caller, Mark Razzoli who is well known to Spadea and attended Common Sense events with Spadea, made the following comments. *"Chris Christie, Jack Ciattarelli, and these other RINOs worked with Democrats, and they ushered in defund the police into New Jersey. Now we have this empty suit, Alex Sauickie, who all he does is pump out bills. This is all about show and political experience. He's looking for votes for him and his buddy, Jack Ciattarelli. Don't be fooled by this guy. He's a fraud."* Putting on a caller you know well and allowing them to assail your Republican primary opponent as a Republican In Name Only ("RINO") is unquestionably an attack.<sup>12</sup> Allowing that same caller to suggest your opponent ushered in defund the police is also an attack. Spadea also marries his campaign messaging with his on-air messaging. With numerous tweets on X attacking Ciattarelli for voting to give driver licenses to illegal immigrants Spadea then followed up with this on-air commentary on December 19, 2024: *"You know, it's making our streets less safe Illegals who got a legitimate driver's license from the state of New Jersey. That's making the streets less safe. Not enforcing federal detainer orders that have child predators released for political reasons, 900,000 illegals here taking your money, bail reform who spins out the criminals inside of ours. That's making our streets less safe- [it's] certainly not our police officers."* This is political commentary tied to his attacks on Ciattarelli and advancing his political positions on the radio despite promises from Townsquare that he would avoid linking political commentary to his campaign. More recently,



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Spadea shown with Mark Razzoli at a "Common Sense Club" event.  
[Spadea spotted supporting felon and Democrat in Keyport](#)

Spadea and NJ101.5 have taken steps to promote Spadea's campaign position with respect to President Trump. This one is from January 23, 2025.



There are numerous additional examples of the Spadea campaign's messaging being repeated on air and Townsquare's social media platforms shortly after its release from the campaign. We are happy to provide the Commission with additional examples and access to transcripts of Spadea's radio show and podcast since his announcement.

### **Conclusion**

The Commission previously advised Spadea and Townsquare that their "guidelines" were "insufficient." Despite that, Townsquare and Spadea took no steps to prevent Spadea from using his radio show and Townsquare's various platforms from benefitting Spadea's campaign. Instead, Bill Spadea and Townsquare conspired to violate New Jersey's campaign finance law by boosting Spadea's name ID and advancing his candidacy. Townsquare has made hundreds of thousands of dollars of unlawful contributions to Spadea's campaign with the full knowledge and acquiescence of Spadea. What is outlined above is merely the tip of the iceberg. The Commission must not allow Spadea and Townsquare to deprive Republicans of a fair primary contest. Accordingly, until the Commission determines the full value of Townsquare's contributions, the impact on Spadea's expenditure limit, and appropriate penalties, it should withhold matching funds from Spadea.

If the Commission fails to act to prevent this harm from impacting the Republican primary, it will have completely abdicated its role as the entity responsible for enforcing New Jersey's campaign finance laws. This is not a question about a prior restraint of speech or of equal time. This is a question of the Commission enforcing its regulations and the New Jersey Campaign Contributions and Expenditures Reporting Act. It is about enforcing them consistently. What Spadea and Townsquare conspired to do is no different than what the Commission told Mayor Fulop he could not do. Any other conclusion is completely unfounded.

Accordingly, Ciattarelli demands that the Commission act to protect the integrity of the Republican primary and New Jersey's public financing system. Failing to do so leaves the Commission as a toothless tiger and rewards the bad acts of Spadea and Townsquare. Had Spadea stayed on the air, stuck to reading the traffic and the news there would be no issue. However, that is not what happened. Townsquare and Spadea used valuable airtime and social media resources to boost Spadea's name recognition and his candidacy. This Commission cannot allow that conspiracy and its flagrant violations of the law to go unpunished.

Respectfully submitted,

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