

June 16, 2025

To:

New Jersey Election Law Enforcement Commission
P.O. Box 185
Trenton, NJ 08625-0185

From:

Tiffanie Fisher
1500 Hudson St. #2H
Hoboken, NJ 07030
201-208-1674
TiffanieFisher@hotmail.com

Via email: RFI@elec.nj.gov

Re: CONFIDENTIAL REQUEST FOR INVESTIGATION – Alleged Campaign Finance Violations by Councilman Michael Russo

Dear Commissioners,

I respectfully submit this Request for Investigation to you concerning potential violations of New Jersey campaign finance laws by Councilman Michael Russo, a current member of the Hoboken City Council and a declared candidate for Mayor of Hoboken in the 2025 municipal election.

Councilman Russo currently maintains two active campaign committees:

- for the 2027 City Council (opened shortly after his 2023 re-election)
- for his 2025 mayoral campaign (opened in 2024).

It is well known in Hoboken that he has been running and fundraising solely for mayor since 2023, yet he has funded nearly all campaign expenses through the 2027 Council account—even as he raised unusually large sums, mostly from developers and special interests giving at the individual maximum limit. These contribution amounts are atypical for a single-ward Council candidate and more consistent with a mayoral-level campaign. This misuse of the Council account to fund a mayoral bid is both irregular and concerning.

This request for an investigation stems directly from the concerns raised in my earlier advisory opinion request, which highlighted the risk that candidates —

including Councilman Russo — would use multiple, concurrent campaign committees to improperly maximize fundraising and circumvent contribution limits. Unfortunately, as anticipated, Councilman Russo has engaged in precisely the type of fundraising and expenditure activity the Commission warned against — not only that, but also broader violations of ELEC law — necessitating this formal request for investigation and enforcement.

Specifically, I am requesting that the Commission:

- Investigate whether Councilman Russo transferred and contributed funds raised under his 2023 and 2027 City Council committees to his 2025 mayoral campaign, in excess of what is permitted under New Jersey campaign finance laws.
- Determine whether specific expenses—such as campaign literature, policy proposals, high-priced consultants, and a professionally produced launch video—were incurred through his 2027 Council committee but in fact were for the benefit of his 2025 mayoral campaign and thus should be classified as in-kind contributions exceeding the \$17,300 cap between committees.
- Examine whether eight (8) individuals—six (6) members of one family all affiliated with one company — violated contribution limits by donating at or near the legal maximum to both Councilman Russo’s concurrent City Council and mayoral committees, but effectively funding only his mayoral campaign.
- Audit the \$178,000 already spent under his 2027 Council committee as of the end of 1Q25, and any future expenditures in this committee, to assess what portion supported his mayoral campaign and whether this violates New Jersey campaign finance laws.
- Prohibit any further use of funds from the 2027 Council committee for mayoral or other purposes, as Councilman Russo is not currently seeking re-election to the City Council.
- Take any enforcement action permitted under ELEC’s authority—including fines and/or requiring the return of improperly contributed funds—to rectify the situation.

These concerns are not hypothetical — they are supported by ELEC filings, public records, and substantial documentation. In the information below, I have indicated the specific, supportive document.

BACKGROUND: PRIOR ADVISORY OPINION

In March 2025, I submitted an advisory opinion request (Request_032025.pdf) raising concerns that candidates could misuse separate campaign committees—each designated for a different office—to skirt contribution limits and disclosure obligations.

The Commission’s advisory opinion, issued on April 9, 2025 (ao032025.pdf), clarified that while a candidate may maintain multiple committees for different offices, **all fundraising and spending must reflect the specific office being sought**. This opinion also pointed to the strict requirements governing transfers between committees:

- Transfers between committees are limited to \$17,300 in aggregate, including both direct and in-kind contributions.
- Any expenditure by one committee that benefits another must be treated as an in-kind contribution and count toward the \$17,300 limit.
- **A new committee must be established within 10 days** of announcing candidacy for a different office.
- Crucially, a full balance transfer from one committee to another is only permissible if the **prior committee has been fully terminated and discloses that transfer before the new committee is formed**.

Despite these clear safeguards, Councilman Russo’s use of his 2003 and 2027 Council committees and his 2025 Mayoral committees appears to violate both the spirit and letter of the Commission’s guidance.

HELPFUL CONTEXT

To demonstrate how Councilman Russo’s fundraising far exceeds typical ward-level norms—and signals possible misuse of his Council committee—consider the following:

- Hoboken ward races (1/6 of the city) usually cost \$35,000–\$45,000, with campaigns starting in July/August and ending on Election Day.
- In all three of my highly contested council races (2015, 2019, 2023), I spent between \$25,000–\$40,000.
- Mayoral campaigns, by contrast, are citywide and typically require six times the budget—or more. Recent well-funded mayoral campaigns in Hoboken have ranged between \$300,000 and \$1,000,000.

Councilman Russo, however, has been fundraising at levels indicative of a mayoral, rather than ward, campaign:

- **2023 election** - despite no serious competition (his only opponent filed an A-1 and later endorsed him), Russo raised **\$239,000 and transferred \$81,000** of his new “2027 Council” account. He spent **\$156,000** on consultants, printing, and rent in that cycle—roughly four times typical ward-level fundraising (20DayPost R-1, Amended 4/2/24) (see Exhibit D). (20DayPost R-1, Amended, 4/2/24) (See exhibit D).
- **Q4–2024 / Q1–2025:** His 2027 committee raised an additional **\$302,000**, bringing the total to **\$383,000**, and has already spent **\$178,000**—years ahead of any ward campaign (1Q25 R-1, 4/15/25).

By contrast, here’s a breakdown of Russo’s past campaigns:

- **2011:** Spent **≈ \$32,000 in a competitive race** where his opponent spent **≈ \$11,000**. (20DayPost R-1, 6/2/11).
- **2015:** Although he **ran unopposed**, Russo loaned his campaign **\$17,500** and spent approximately **\$31,000**. Notably, about **\$18,000** was paid to over 250 individuals labeled as “campaign workers”—including **\$16,000** paid to 230 Hoboken Housing Authority residents living outside the 3rd Ward, in areas where Russo supported other candidates. These payments were never reported as in-kind contributions—an omission that obscures the true source and intent of the expenditure. (20DayPost – 12/17/15; 4Q15 – 1/27/16; 1Q16 - 4/25/16)
- **2019:** Spent **≈ \$28,000** against an **opponent who spent under \$5,000**; (20DayPost – 11/26/19).
- **2023:** Despite facing **no serious opposition** — his opponent filed an A-1 and later endorsed Russo — he raised **\$239,000** and spent **\$156,000** on things like Washington, D.C.–based consultants (see Exhibit D) and transferred **\$81,000** to his 2027 Council campaign, marking a clear pivot toward a mayoral run. (20DayPost – 11/26/19)

Conclusion: Russo’s **\$383K raised** and **\$178K spent** well in advance of any ward election, vastly exceed historical norms for Council races. These figures align with citywide mayoral spending levels and are strong evidence that Russo has been improperly using his Council committee (and 2023 account) to fund his 2025 mayoral campaign, in violation of ELEC regulations.

TIMELINE OF KEY EVENTS

- **12/2/23** – Russo filed his 20DayPost R-1 for his 2023 Council committee with an ending balance of \$81K; not showing plans to transfer the balance to his next election.
- **2/9/24** – Russo filed D-1 to establish NEW 2027 Council committee
- **Between 12/13/23 to 3/29/24** – Russo raised \$163K in donations >\$200 under his new 2027 Council committee, while still maintaining his 2023 committee (1Q24 R-1, 4/16/24)
- **4/3/24** – After his new 2027 committee was opened, not before per the law, Russo closed out the 2023 Council account, transferring \$81K funds to 2027 committee (law limits this to \$17,300 if done after new committee was already filed) (20DayPost R-1 4/3/24).
- **4/16/24** – Russo filed his 2027 Council 1Q24 R-1: \$157K receipts (incl. \$81K transfer & \$10K refund), \$17K expenditures
- **7/16/24** – Russo filed his 2027 Council 2Q24 R-1: \$47K receipts, \$47K expenditures
- **10/29/24** – Russo filed his 2027 Council 3Q24 R-1 (Amended): \$88.3K receipts, \$24K expenditures
- **1/31/25** – Russo filed his 2027 Council 4Q24 R-1: \$81K receipts, \$44K expenditures
- **2/10/25** – Russo filed his filed D-1 to establish 2025 Mayoral committee
- **2/18/25** – Russo publicly announced his mayoral candidacy with a well-made, seemingly expensive video paid for by his 2027 Council committee.
- **3/5/25** – I filed an advisory opinion request from ELEC
- **4/9/25** – ELEC issued the advisory opinion
- **4/15/25 & 4/21/25** – Post advisory opinion, Russo filed his
 - 2027 Council 1Q25 R-1: with fewer receipts but high expenditures: \$10K receipts, \$47K expenditures – including a \$17.3K transfer to his mayoral committee and two in-kind contributions totaling \$230K
 - 2025 Mayor 1Q25 R-1: with higher receipts and fewer expenses: \$166K receipts (including the \$17.3K transfer from his council

committee), \$9K expenditures with 8 donors whose combined giving to both committees appears to exceed individual limits.

- **5/15/25** – Russo filed an amended 2025 Mayor 1Q25 R-1 that refunded \$1K of the \$17.3K transfer from his 2027 Council account by \$1K to \$16.3K:

By transferring \$16,300 from his 2027 Council account to his 2025 mayoral campaign and listing two in-kind expenses totaling \$230K, Russo is effectively acknowledging that the remaining funds and expenses in his Council account are solely for Council purposes—not mayoral. Yet he is not actively running for City Council and continues to route mayoral-related expenses through the 2027 Council account, while directing new donors to his mayoral campaign. This strategy allows him to maintain access to the Council funds while presenting a façade of compliance.

FACTUAL BASIS FOR INVESTIGATION

1. Improper Use of Council Campaign Funds for Mayoral Campaign

Councilman Russo has funded numerous mayoral campaign activities using funds from his 2027 Council account, including among others:

- Public distribution of “Russo for Mayor” branded materials including public policy documents, at public events that were created months earlier in 2024, prior to the official formation of his 2025 Mayoral Campaign committee (see Exhibit A).
- High-production campaign launch video (see Exhibit B) not disclosed in his mayoral reports.

2. Violation of \$17,300 Transfer Limit Between Committees

Mr. Russo in the first quarterly reporting for 2025 transferred the full \$16,300 in cash allowed between committees and two in kind payments totaling \$230. But he did not report any of the other costs presumably of consultants who have advised him, and prepared his policy and video, or the rent for his Mayoral campaign office, as examples. Combined these are estimated to be potentially over \$110K (see Exhibit D).

3. Excessive Contributions Across Committees

Eight (8) donors—six of whom are affiliated with the same family-connected developer—gave at or near the maximum allowable amount to **both** Russo’s 2027 Council and 2025 mayoral committees, jointly

contributing over **\$69,000**. Additional family members have maxed out one of the two committees, though not both. Moreover, a suspicious donation duplication appears in Q1 2024: “Keisa Agnija” and “Agnija Keisa” each donated **\$5,200** on consecutive days (see Exhibit C), suggesting potential reporting manipulation. Combined, these contributions total approximately **\$100,000**, making up a significant portion of Russo’s total fundraising to date

4. Underreporting of Mayoral Campaign Activity

Despite visible campaigning and materials use, Russo’s Q1 2025 mayoral report discloses only minimal fundraising and ad spending, inconsistent with the scope of his public activity.

5. Failure to Identify the Office Sought

Materials financed by the Council campaign promote a mayoral candidacy without clearly identifying it, violating ELEC attribution regulations.

6. Continued Use of Council Committee While Not Seeking Council Seat

Russo is not campaigning for re-election to the Council. Continuing to use the Council account for campaign purposes appears to subvert ELEC’s committee regulations.

ALLEGED VIOLATIONS

N.J.S.A. 19:44A-11.2 – Contribution limits – individual (\$5,200) and committee to committee (\$17,300) – appears to be the main statute that is central to alleged violations by Russo. And to what extent, and what other violations will be revealed, will be determined by whether the commission determines if Russo is fundraising and spending money consistent with the main tenet of NJ election law, which is that you can run two concurrent campaigns, but the funds raised under each have to be used for that specific purpose, within the statutory contribution limits and reporting requirements.

REQUESTED ACTION

I respectfully ask the Commission to:

1. Investigate whether Russo exceeded the \$17,300 cap with direct or in-kind transfers.
2. Review whether eight (8) donors exceeded contribution limits.

3. Audit the \$178,000 spent under the Council account to determine mayoral campaign relevance.
4. Restrict future use of the Council account unless Russo files for Council re-election and clearly uses the funds for that purpose.
5. Impose penalties and require corrective filings for violations.

Thank you for your diligent review of Councilman Russo's conduct. I am hopeful the Commission will thoroughly examine these concerns to promote greater transparency and fairness in our elections. I remain available to provide any further documentation or clarification as required.

Best regards,



Tiffanie Fisher

Attach.

SUPPORTING INFORMATION

- **Exhibit A:** Photo of “Russo for Mayor” materials at the Hoboken Foodie Fest (April 5, 2025)



Circled in Red in the Photo, Mayoral branded materials created months before he declared running for mayor, and clearly funded by his City Council account including:

- May 16 2024: [Hoboken Councilman Russo Releases Transportation and Parking Proposal, Announces Inaugural Town Hall Event On May 29th - Insider NJ](#)
 - September 16, 2024: [Councilman Michael Russo Releases Housing Policy Proposals | Hoboken, NJ News TAPinto | TAPinto](#)
 - February 4, 2025: [Russo rolls out Hoboken health, quality of life, & public safety plan, his 3rd to date - Hudson County View](#)
- **Exhibit B:** Campaign launch video <https://www.youtube.com/watch?v=V2ADNDS8Kks> & posted on [Instagram](#) (dated 2/18/2025)