To: **New Jersey Law Revision Commission**
From: **Candy Ley Velazquez, Counsel**
Re: **Unconstitutional Provisions Relating to Recall of Federal Officials under N.J.S. 19:27A–1 –18.**
Date: **October 6, 2025**

MEMORANDUM[1]

Project Summary

In 1993, New Jersey voters approved a constitutional amendment allowing certain elected officials to be subject to recall elections.[2] Two years later, the Uniform Recall Election Law ("UREL"), codified at N.J.S.A. 19:27A–1 to 18, went into effect, establishing procedures for conducting recall elections.[3]

To initiate a recall, a registered voter files a notice of intention with the Secretary of State.[4] The notice must include the name of the official and information about the recall committee.[5] If the notice does not comply with the statutory requirements, it is returned with a written explanation.[6] If the notice is compliant, it is accepted, a cost estimate for the election is prepared, and notice is served on both the public and the official.[7] The recall committee then has a limited time to collect signatures from 25% of the voters in the official's district.[8] Once the signatures are verified, a recall election is scheduled to determine if the official will be removed.[9]

In 2010 in *Comm. to Recall Robert Menendez From the Office of U.S. Senator v. Wells*, the New Jersey Supreme Court addressed whether a sitting United States Senator can be subject to recall.[10] The Court held that while recalling state level officials is permitted, only the federal

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[1] Preliminary work on this project was conducted by Andrew Galligan, during his time as Legislative Law Clerk for the New Jersey Law Revision Commission.
[2] Public Question No.1, Nov. 2, 1993, available at https://www.nj.gov/state/elections/assets/pdf/election-results/1993/1993-public-questions.pdf (last visited September 29, 2025). *see also* N.J.S. CONST. art. 1, para. 2.
[3] N.J. STAT. ANN. §§ 19:27A-1 to 18 (West 2025).
[4] N.J. STAT. ANN. § 19:27A-6 (West 2025).
[5] N.J. STAT. ANN. § 19:27A-6 (West 2025); Voters form committees to recall elected officials in New Jersey as a means to initiate a recall election. *Id.* The committees are specific to the official seeking to be recalled. *Id.*
[6] N.J. STAT. ANN.§ 19:27A-7 (a), (b) (West 2025).
[7] *Id.*
[8] N.J. STAT. ANN.§ 19:27A-5, -10 (West 2025).
[9] N.J. STAT. ANN. § 19:27A-13 (a), (b); 19:27A-16 (West 2025).
[10] *Comm. to Recall Robert Menendez From the Office of U.S. Senator v. Wells*, 204 N.J. 79 (2010).

legislature has the authority to remove its members.[11] The portions of the UREL and the State Constitution[12] authorizing the recall of Members of Congress were held unconstitutional. [13]

Statute Considered

N.J.S.A. 19:27A-2 states, in relevant part:

Pursuant to Article I, paragraph 2b. of the New Jersey Constitution, the people of this State shall have the power to recall, after at least one year of service in the person's current term of office, any United States Senator or Representative elected from this State or any State or local elected official in the manner provided herein.

N.J.S.A. 19:27A-3 states, in relevant part:

As used in this act:

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"Elected official" means any person holding the office of United States Senator or member of the United States House of Representatives elected from this State, or any person holding a State or local government office which, under the State Constitution or by law, is filled by the registered voters of a jurisdiction at an election, including a person appointed, selected or otherwise designated to fill a vacancy in such office, but does not mean an official of a political party.

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N.J.S.A. 19:27A-8 states, in relevant part:

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e. (1) whenever the official sought to be recalled is the Governor or a United States Senator, separate sections of the petition shall be prepared for use by the signers registered to vote

[11] *Id.* at 130 (holding that state laws authorizing recall of federal officials conflict with Article I of the U.S. Constitution, which vests removal authority solely in Congress and fixes the term of office at six years)).

[12] The relevant constitutional amendment preceding the UREL is N.J.S. Const. art. 1, para. 2, which states in pertinent part: "The people reserve unto themselves the power to recall, after at least one year of service, any elected official in this State or representing this State in the United States Congress." (emphasis added). Because this provision is constitutional in nature rather than statutory, it falls outside the Commission's review and scope of this project. The portion of the amendment related to elected officials serving in the United States Congress was held unconstitutional, as were similar provisions of the UREL. *Comm. to Recall Menendez*, 204 N.J. at 86-87.

[13] *Id.; see also* Jennifer Kim, *State Constitutional Law—Recall Elections—The New Jersey Supreme Court Holds the Recall of U.S. Senators Under State Law Unconstitutional*, 43 RUTGERS L.J. 705, 723 (2010) (explaining that the court's decision to find the UREL unconstitutional aligns properly with the Framer's intent). While the facts of the *Comm. to Recall Menendez* related to a United States Senate seat, the Court noted that only the state officials referenced in the UREL and State Constitution could remain subject to recall. *Comm. to Recall Menendez*, 204 N.J. at 86-87.

in each county. Each page of a section shall bear in not less than 10-point type the name of the county in which is to be used and the statement, "Only eligible persons residing in…….(name of county) County shall sign his page." A signer shall not affix the signer's signature to any page of any section unless it bears the name of the county in which the signer is registered to vote.

(2) Whenever the official sought to be recalled is a member of the Legislature or a member of the United States House of Representatives and the official's jurisdiction includes parts of more than one county, separate sections of the petition shall be prepared for use by signers registered to vote in each county included within the member's jurisdiction. Each page of a section shall bear in not less than 10-point type the name of the county in which that section is to be used and the statement, "Only eligible persons residing in (name of county) County shall sign this page." A signer shall not affix the signer's signature to any page of any section unless it bears the name of the county in which the signer is registered to vote.

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N.J.S.A. 19:27A-10 states, in relevant part:

a. A recall committee shall collect the required number of signatures and file a completed petition with the recall election official within the following time periods calculated from the date that the recall petition receives final approval for circulation from the recall election official:

(1) 320 days, when the Governor or a United States Senator is sought to be recalled.

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N.J.S.A. 19:27A-17 states, in relevant part:

c. The limits on contributions established by 2 U.S.C s. 441a shall apply to a federal elected official sought to be recalled, a candidate to succeed such an official and a recall committee seeking to recall a federal elected official.

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Background

In November 2006, Robert Menendez was elected to the United States Senate for a six year term.[14] In September 2009, the Committee to Recall Robert Menendez from the Office of U.S Senator ("Committee") submitted a notice of intention to the Secretary of State and the Directors

[14] *Comm. to Recall Menendez*, 204 N.J. at 89.

of Elections seeking the recall of Senator Robert Menendez.[15] By December 1, 2009, the Secretary of State had not responded, prompting the Committee to file a complaint in lieu of a prerogative writ to compel either the acceptance or rejection of the notice.[16]

On January 11, 2010, acting on the advice of the state Attorney General, the Secretary of State issued a final agency determination denying the petition, noting that "the qualifications and election of a Member of the United States Senate is a matter of exclusive jurisdiction of federal authority and…neither the United States Constitution nor federal statute provide[s] for a recall proceeding for a federally-elected official."[17]

The Committee applied for emergent relief with the Appellate Division, arguing that the Secretary of State, "as an agent of the executive branch, was in no position to opine on the validity of the UREL."[18] The Committee contended that the constitutionality of the UREL would not be ripe for review until a recall election ordered Senator Menendez's withdrawal, and that the recall process must be allowed to proceed because it constitutes "core political speech" protected by both the Federal and State Constitutions."[19]

Representing the Secretary of State, Director of Elections, and Senator Menendez, the Attorney General argued that "the Federal Constitution is the sole legal authority that governs the qualifications and right to expel a Member of Congress". The Attorney General asserted that the UREL is unconstitutional and ripe for adjudication.[20]

The Appellate Division "questioned the constitutionality of the UREL but declined to 'pass[ ] on the ultimate validity of the recall process regarding a United States Senator" instead ordering the "Secretary of State to accept and file the petition, and to proceed under the statute."[21] The Appellate Division cited New Jersey's "rich tradition…of recognizing individual rights that often go beyond the bare minimums conferred by the Federal Constitution," and perceived "no urgent reason" to address the constitutional issue if the Committee's petition drive fails to gather the necessary signatures.[22]

The New Jersey Supreme Court granted Senator Robert Menendez's petition for granted certification.[23]

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[15] *Id.*
[16] *Id.*
[17] *Id.* at 89-90.
[18] *Id.* at 90.
[19] *Id.* at 90.
[20] *Id.*
[21] *Id.* at 91-92 (observing that "from what has been written and not provided in the Federal Constitution" based on its text and relevant historical evidence, "one could reasonably conclude that the Constitution precludes the recall of a United States Senator").
[22] *Id.* at 93 (finding that there was a "sufficient basis for the Committee to proceed with its initiative and for the Secretary of State to perform her ministerial function" without "passing on the ultimate validity of the recall process).
[23] *Id.* at 93.

Analysis

Senator Menendez argued that the UREL was ripe for review and that the UREL and the State Constitution's recall amendment conflict with the Federal Constitution and are preempted by the supremacy clause. [24]

The Committee asserted that Senator Menendez "will not face any judicially recognizable harm unless and until a recall election is held and he loses it."[25] It emphasized that the UREL "is critical to democratic participation in this State and necessary to ensure that New Jersey citizens retain representation when their Senators are not fit or able to fulfill their duties."[26] The Committee maintained that there is no "express conflict with a federal constitutional or statutory provision" preventing states from adopting recall measures for members of Congress.[27]

The Court first examined the issue of ripeness, observing that "[t]he Secretary's refusal to accept and review the notice of intention generated an ongoing controversy."[28] Applying the doctrine of ripeness, the Court concluded that the first factor, the fitness of issues for judicial review, was satisfied because the issues "in dispute are 'purely legal,'" and therefore "'appropriate for judicial resolution' without developing additional facts."[29] As to the second factor, potential hardship to the parties if judicial review is withheld, the Court found that "abstain[ing] from resolving the case" would cause harm, including requiring Senator Menendez to divert time from official duties to engage in the recall process.[30]

Federal Constitutional Provisions and the Supremacy Clause

The Court adopted the same analytical framework used by the United States Supreme Court ("Supreme Court") in *U.S. Term Limits, Inc. v. Thornton*, reviewing the "text and structure of the Federal Constitution, relevant historical materials, and principles of our nation's democratic system" to determine whether a state may recall a United States senator. [31]

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[24] *Id.* at 93-94 (further asserting that the "Tenth Amendment did not reserve to the States the power to recall a Senator").
[25] *Id.*
[26] *Id.*
[27] *Id.* (relying for its position on a "a private letter by President Washington and the history of the Seventeenth Amendment [which] confirm the constitutional right to recall").
[28] *Id.* at 95.
[29] *Id.* at 99 (noting that "because the Secretary's decision constitutes a final administrative agency determination, this Court's review will not 'inappropriately interfere with further administrative action.").
[30] *Id.* at 100. (adding that the recall "also injects uncertainty and instability into the State's electoral scheme—inviting citizens to sign petitions in the belief that they are participating in a constitutional process—and adversely affects public confidence in the integrity of the system").
[31] *Id.* at 103 (citing *U.S. Term Limits, Inc. v. Thornton*, 514 U.S. 779, 809 (1995) (addressing the constitutionality of an Arkansas State Constitution provision "prohibit[ing] the name of an otherwise-eligible candidate for Congress from appearing on the general election ballot if that candidate has already served three terms in the House of Representatives or two terms in the Senate")).

Relying on the Supremacy Clause as "the backbone of their analysis," the Court explained that state law is rendered "without effect" if it "conflicts with the Federal Constitution."[32] This principle, the Court noted, is well-supported by precedent evaluating the validity of state constitutional provisions that conflict with the Federal Constitution.[33]

With that foundation, the Court began its analysis with the "plain language of the Federal Constitution."[34] Article I, Section 3, Clause 1[35] provides that "a Senator's term of service is six years" and Article I, Section 5, Clause 2, permits each house of Congress to expel a member by a two-thirds vote.[36] Together, these provisions establish that the only constitutionally authorized method for abridging a Senator's term lies with Congress, not the states.[37]

The Court observed that this textual structure "suggests that a Senator's term is fixed and that any right to prevent a Senator from completing his or her term is vested in the Senate, not the States."[38] While the Constitution delegates limited power to the states over congressional elections,[39] the Committee argued that the Constitution's silence on recall "is not a prohibition against" it.[40]

Extrinsic Sources: The Constitutional Convention

The Court then turned to extrinsic sources for guidance in interpreting the Constitution, beginning with the "intent of the Framers expressed at historical debates at both the Constitutional and the state ratifying conventions."[41]

According to the historical record, "the right of recall was considered and rejected" at the Constitutional Convention.[42] A proposal allowing the recall of Members of Congress was

[32] *Id.* (explaining that "a state may not legislate in an area in which it is preempted by the Federal Constitution or federal law).
[33] *Id.* at 104-05 (citing *Jackman v. Bodine*, 43 N.J. 453,461,473(1964) ("holding that state constitutional provision that allocated a portion of seats in Legislature without regard to population violated 'one person, one vote' mandate of Fourteen Amendment")).
[34] *Id.* at 105.
[35] U.S. CONST. art. I, § 3, cl. 1.
[36] U.S. CONST. art. I, § 5, cl. 2.
[37] *Id.* ("in 1906, the U.S. Supreme Court noted in dicta that a Senator's seat 'could only become vacant by his death, or by expiration of his term of office, or by some direct action on the part of the Senate in the exercise of its constitutional powers'" (quoting *Burton v. United States,* 202 U.S. 344, 369 (1906))).
[38] *Id.* at 105. The Court explained that U.S. CONST. art. I, §5, cl. 1 delegates to each house "the Judge of the Elections, Returns and Qualifications of its own Members" and additionally, in the "Elections Clause," "delegates limited power to the States in the realm of elections for Members of Congress," including the details of holding elections. *Id.* at 105-06 (citing U.S. CONST. art. I, §5, cl. 1 and U.S. CONST. art. I, §4, cl. 1).
[39] *Id.* at 105-06 ("but the Congress may at any time by law make or alter such Regulations, except as to the Places of chusing Senators." U.S. Const. art. I,§ 4, cl.1(Elections Clause)").
[40] *Id.* at 106.
[41] *Id.* ("to the extent that the Federal Constitution is unclear or ambiguous, we look to interpretative aides for guidance").
[42] *Id.* at 107.

unanimously rejected by the states.[43] Delegates such as Alexander Hamilton opposed recall, warning that granting the states the power to recall would make the federal government overly dependent on the will of the individual states.[44]

After the Convention, the idea of recall continued to surface in state ratifying conventions.[45] Although New York, Pennsylvania, and Rhode Island "proposed amendments that would have explicitly allowed for the recall of Senators," the proposals failed, "and all thirteen States ratified the Constitution without a recall provision in it."[46]

The Court agreed with the conclusion drawn by the Supreme Court in *Thornton*, that "the Framers rejected a recall provision and denied the States the power to recall."[47]

The Seventeenth Amendment

Next, the Court reviewed the history of the Seventeenth Amendment,[48] which "provided for direct election of U.S. Senators."[49] Although the Committee pointed to the Seventeenth Amendment "as a source of authority for states to recall U.S. Senators," the Court explained that the Amendment "changed the mode of selecting Senators, [but] did not provide for the power of recall."[50] The congressional reports related to the Amendment made clear that the Amendment addressed only the method of election and "emphasiz[ed] [that] the import of the Seventeenth Amendment does not reverberate beyond its specific terms."[51]

The Elections Clause

Upon examining the Elections Clause[52], the Court concluded that the Clause "offers no support for recall," as it grants states authority only over the "time, place, and manner" of congressional elections, not to "enact substantive legislation, like recall laws, which would alter

[43] *Id.*
[44] *Id.* at 108 ("certain delegates at the constitutional convention who favored recall of Senators acknowledged that recall was not part of the draft constitution). The Court explained that the "inability of the States to recall Senators became a rallying point for the Anti-Federalists, who opposed the ratification of the Constitution." *Id.*
[45] *Id.* at 111.
[46] *Id.* at 110-11.
[47] *Id.* at 111-12.
[48] U.S. CONST. amend. XVII.
[49] *Id.* at 113.
[50] *Id.* ("The amendment, in relevant part, struck the following underlined language from Article I, Section 3, Clause 1—'The Senate of the United States shall be composed of two Senators from each State, chosen by the Legislature thereof, for six years; and each Senator shall have one Vote'—and replaced the phrase with 'elected by the people thereof.'") (citing U.S. CONST. amend. XVII)).
[51] *Id.* at 116. ("This amendment does not propose in any way to interfere with the fundamental law save and except the method or mode of choosing the Senators.") *see also* H.R. Rep. No. 62-2 at 3 (1911); S. Rep. No. 61-961, at 5 (1911).
[52] U.S. CONST. art. I, §4, cl. 1.

the duration of congressional terms of office." [53] Because recall has the potential "to 'dictate electoral outcomes,'" the Court reasoned that recall constitutes a "regulation of congressional elections [that] simply is not authorized by the Elections Clause." [54]

The Structure of the Senate

The Court emphasized that the inability to recall senators is consistent with "the 'basic principles of our democratic system' established in the Constitution."[55] "The Framers deliberately structured the Senate as a stable and independent body" able to take "a longer view of the national interest" through six-year terms, "neither created by, dependent upon, nor controllable by, the states," and "ow[ing] primary allegiance… to the people of the Nation." [56]

Recalling senators, the Court warned, "could erode the stability and national quality of the Senate and lead to a 'patchwork' of state terms of service," "undermin[e] the uniformity and the national character that the Framers envisioned," and "sever the direct link that the Framers found so critical between the National Government and the people of the United States."[57]

The Court concluded that a comprehensive "review of the constitutional text, history, and structure of the democratic system reveals that the Federal Constitution does not permit recall."[58]

Recall Provisions in Other States

Michigan, Wisconsin and New Jersey are the only states to have drafted their recall provisions to expressly include Members of Congress.[59] Other states' recall laws may also apply to Members of Congress as the laws do not "specifically exclude[] members of Congress."[60] The Court noted that no published opinion by either a state or federal court has addressed the validity of recall laws applicable to Members of Congress.[61] However, Attorneys General in several states have issued their advisory opinions, concluding with one exception[62] that a "state recall law cannot

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[53] *Id.* (quoting *Thornton,* 514 U.S. at 832 ("By its own terms, [the Elections Clause] 'grant[s] States authority to create procedural regulations'…"not to enact substantive legislation like recall laws, which would alter the duration of congressional terms of office.")).
[54] *Id.* at 117. (quoting *Cook v. Gralike*, 531 U.S 510, 536 (2001)).
[55] *Id.* at 117. (quoting *Thornton*, 514 U.S at 806 (1995)).
[56] *Comm. to Recall Menendez*, 204 N.J. at 117. (quoting *Thornton*, U.S 779 at 803 (2001)).
[57] *Comm. to Recall Menendez*, 204 N.J. at 117. (quoting *Thornton*, U.S 779 at 822 (2001; *Cook v. Gralike*, 531 U.S. at 510,521(2001)).
[58] *Id.* at 118.
[59] *Id.* (Arizona also provides for the recall of members of Congress, but only those officials who "pledge to resign if not re-elected…").
[60] *Id.* (quoting Timothy Zick, The Consent of the Governed: Recall of United States Senators, 103 DICK. L. REV. 567 (1999).
[61] *Id.* at 119.
[62] *Id.* at 120-21 (quoting 68 Op. Atty' Gen. Wis. 140 (1979) (Wisconsin Attorney General wrote that "while he had 'attempted neither a resolution nor a comprehensive analysis of the constitutional issue,' he was 'not aware of any clear manifestation of Congress' intent to preempt otherwise compatible state regulation in this area,' and thus could not 'state that our recall provisions would be declared unconstitutional on grounds of federal preemption.'")).

be applied to a U.S Senator."[63] The Court observed that "[a] resounding consensus of legal scholarship agrees that state law cannot be used to recall a Member of Congress."[64]

United States Supreme Court Opinions

The Court reviewed three Supreme Court decisions that "considered and rejected supplemental conditions to congressional terms of service."[65]

In *Powell v. McCormack*, the Court held that the House of Representatives has no power to exclude its members provided the three qualifications for membership of Article 1, Section 2, Clause of age, citizenship, and residency were satisfied.[66] Relying on historical sources, the *Powell* Court found no support for the view that Congress has a "judicially unreviewable power to set qualifications for membership" and concluded that the Clause is "at most a 'textually demonstrable commitment' to Congress to judge only the qualifications expressly set for in the Constitution."[67]

In *Thornton*, the Court struck down an Arkansas law that imposed term limits on congressional representatives.[68] Reaffirming *Powell*, the Court held that "Congress may not alter or add to the qualifications in the Constitution."[69] After reviewing "the text and structure of the Constitution, the relevant historical materials, and the most importantly, the 'basic principles of our democratic system," the *Thornton* Court concluded that the Constitution "allows the States but a limited role in federal elections."[70]

In *Cook v. Gralike*, the Court held unconstitutional a Missouri state constitutional amendment that required ballots to display negative labels next to the names of congressional candidates who did not support term limits.[71] The *Cook* Court emphasized that "[s]tates may only regulate Congressional elections to the extent that such power is delegated by the Elections Clause."[72]

The *Comm. to Recall Menendez* Court concluded that taken together, these three Supreme Court cases "demonstrate that the six-year term in Article I, Section 3, Clause 1 is… fixed and exclusive," and thus not subject to recall. [73]

The Tenth Amendment

[63] *Comm. to Recall Menendez*, 204 N.J. at 120.
[64] *Id.* at 121 (noting that no court has upheld a state law recalling a federal legislator and that legal scholarship overwhelmingly recognizes such laws as unconstitutional without a federal amendment).
[65] *Id.* at 122.
[66] *Id.* (citing *Powell v. McCormack*, 395 U.S. 486, 489 (1969)).
[67] *Comm. to Recall Menendez*, 204 N.J. at 122-23 (quoting *Powell*, 395 U.S. at 516, 532).
[68] *Comm. to Recall Menendez*, 204 N.J. at 123.
[69] *Comm. to Recall Menendez*, 204 N.J. at 123 (quoting *Thornton,* 514 U.S. at 796).
[70] *Comm. to Recall Menendez*, 204 N.J. at 123-24 (quoting *Thornton,*514 U.S. at 806, 822).
[71] *Comm. to Recall Menendez*, 204 N.J. at 124 (quoting *Cook*, 531 U.S. at 514-15).
[72] *Comm. to Recall Menendez*, 204 N.J. at 124 (quoting *Cook*, 531 U.S. at 522-23).
[73] *Comm. to Recall Menendez*, 204 N.J. at 125.

The Committee "assert[ed] that the omission from the Federal Constitution of any mention of recall—a power that pre-dated the Constitution—signals that the power was reserved to the States or the people via the Tenth Amendment."[7475] The Court rejected this argument, adopting *Thornton*'s view that "[n]o state can say, that it has reserved, what it never possessed." [76] Even the dissent in *Thornton* "acknowledged that a power of recall [was] denied to the States when [the Framers] specified the terms of Members of Congress." [77] The *Comm. to Recall Menendez* Court concluded that "there can be no reserved power relating the election of Members of Congress, whose very offices originated with the Constitution." [78]

The Court held that the portions of the UREL and the Recall Amendment which subject United States senators to recall are unconstitutional, but the laws could remain in effect as "they relate to state and local officials."[79]

Pending Bills

There are currently no pending bills that address the issues raised in *Comm. to Recall Robert Menendez From the Office of U.S. Senator v. Wells*.

Conclusion

Staff requests authorization to conduct further research to determine whether the UREL would benefit from modifications that reference the removal of federal officials.

[74] U.S. CONST. amend. X (provides "[t]he powers no delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people.").
[75] *Id.* at 126.
[76] *Id.* at 125 (quoting *Thornton*, 514 U.S at 802).
[77] *Id.* at 126 (quoting *Thornton*, 514 U.S at 890).
[78] *Id.* at 127.
[79] *Id.* at 129-30. The dissent argued that the power of recall stems from fundamental principles of popular sovereignty, tracing its origins to the Declaration of Independence and early colonial compacts. *Id.* at 149-50. Rejecting the majority's view that constitutional silence forecloses recall, the dissent noted that nowhere in the Constitution's drafting history is there support for the notice that silence extinguishes a historically recognized right. *Id.* at 148-49. The dissent found no textual basis in the Constitution to prohibit recall "…explicitly, or even implicitly, address the right to recall them; nothing in any of those clauses therefore precludes its exercise" and emphasized that the Ninth and Tenth Amendments work together to preserve unenumerated rights. *Id.* at 168-69. The dissent further asserted that the majority should have declined to reach the constitutional issue and criticized the majority for foreclosing public debate on a matter entrusted to the electorate. *Id.* at 171-72.