



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

April 5, 2026

RONALD GRAVINO, TREASURER
KEAN FOR CONGRESS INC
PO BOX 999
EDISON, NJ 08818

Response Due Date
05/11/2026

IDENTIFICATION NUMBER: C00703058

REFERENCE: YEAR-END REPORT (10/01/2025 - 12/31/2025)

Dear Treasurer:

This notice is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 item(s):

1. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$3,500 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f); 11 CFR § 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if, within 60 days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below.

KEAN FOR CONGRESS INC

Page 2 of 5

For reattributions, excessive contributions from individuals can be retained if, within 60 days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written authorization of a reattribution, signed by each contributor, indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written authorization from the contributor to redesignate the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(1).

Please inform the Commission of your corrective action promptly by filing an amended report or Miscellaneous Document (Form 99 for electronic filers). If a remedy will be disclosed in a future reporting period, please provide the date and amount of the remedy in your response. The committee should retain records of refunds, redesignations, and/or reattributions of the contributions in

KEAN FOR CONGRESS INC

Page 3 of 5

question. Refunds are reported on Line 20(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund, redesignate, and/or reattribute the excessive amount will be taken into consideration.

2. Schedule A of your report discloses one or more contributions from an organization(s) which is not a political committee registered with the Commission (see attached). In order for your committee to accept contributions from unregistered organizations, your committee should take steps to ensure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 52 U.S.C. §§ 30116(f) and 30118 or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: (1) establish a separate account which contains only those funds permitted under the Act, or (2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

Please inform the Commission of your corrective action promptly by filing an amended report or Miscellaneous Document (Form 99 for electronic filers). If a remedy will be disclosed in a future reporting period, please provide the date and amount of the remedy in your response. The committee should retain records of refunds of the contributions in question. Refunds must be reported on a Schedule B supporting Line 20(a), (b) or (c), as applicable, of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

KEAN FOR CONGRESS INC

Page 4 of 5

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

3. The totals listed on Lines 6(a), 6(c), 11(a)(i), 11(a)(ii), 11(a)(iii), 11(e), and 12, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the election cycle-to-date totals (11/6/2024 through 11/3/2026). (52 U.S.C. § 30104(b) and 11 CFR § 104.3)

4. Schedule A supporting Lines 11(c) and 12 of the Detailed Summary Page(s) of your combined 2025 reports discloses transfer(s) that exceed the sum of memo Schedule A entries (see attached). Please note that the sum of memo Schedule A supporting a transfer(s) from a joint fundraising committee should be greater than or equal to the amount of the transfer(s).

Each participating committee shall report its share for **net** proceeds received from the joint fundraising committee as a transfer-in on Schedule A, Line 12. A memo Schedule A, Line 12 must be provided to itemize your committee's share of the **gross** contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the election cycle and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. (11 CFR § 102.17(c)(8)(i)(B)) Please amend your report to include the missing Schedule A, Line 12 or provide an explanation for this apparent discrepancy.

5. Your report discloses interest receipts from FirstBank NJ and Ocean First Bank. This depository has not been previously disclosed on your Statement of Organization. Commission Regulations require that each political committee disclose the name of all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds. Please amend your Statement of Organization to disclose all committee depositories. (11 CFR § 102.2(a)(1)(vi))

- Your report disclosed a category of financial activity that appears to be disclosed on the wrong line of the Detailed Summary Page. For your information

KEAN FOR CONGRESS INC

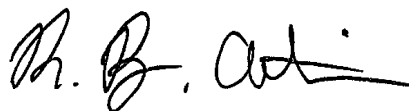
Page 5 of 5

and consideration when preparing future filings, Joint Fundraising Transfers and Memos should be properly disclosed on a separate Schedule A, supporting Line 12 of the Detailed Summary Page. Please refer to the Form 3 instructions for each line when determining the proper categorization(s) for your next filing. (11 CFR § 104.3(a) and (b))

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1196.

Sincerely,

A handwritten signature in black ink, appearing to read "B. B. Austin", with a stylized flourish at the end.

Bradley Austin

Sr. Campaign Finance & Reviewing Analyst

**Apparent Excessive, Prohibited, and Impermissible Contributions
Kean for Congress Inc. (C00703058)**

Apparent Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
Brady, Nicholas Mr.	10/1/25	\$7,000.00	P2026
Cicatiello, Anthony S. Mr.	2/25/25	\$1,000.00	P2026
Cicatiello, Anthony S. Mr.	7/24/25	\$2,500.00	P2026
Cicatiello, Anthony S. Mr.	12/30/25	\$2,500.00	P2026
Eisenberg, Lewis	2/18/25	\$3,500.00	P2026
Eisenberg, Lewis	11/3/25	\$2,000.00	P2026
Fisher, Cynthia	11/19/25	\$5,000.00	P2026
Grillo, Anthony Mr.	3/25/25	\$2,000.00	P2026
Grillo, Anthony Mr.	12/17/25	\$2,000.00	P2026
Heimgartner, Tom	3/31/25	\$3,500.00	P2026
Heimgartner, Tom	10/11/25	\$7,000.00	P2026
Leach, Howard	3/31/25	\$3,500.00	P2026
Leach, Howard	12/19/25	\$2,600.00	P2026
Scharbauer, Douglas	3/31/25	\$1,479.21	P2026
Scharbauer, Douglas	6/30/25	\$56.43	P2026
Scharbauer, Douglas	7/18/25	\$1,964.06	P2026
Scharbauer, Douglas	7/18/25	\$1,078.62	P2026
Spears, John	3/29/25	\$1,200.00	P2026
Spears, John	12/22/25	\$3,500.00	P2026
Weekley, Richard	11/12/25	\$7,000.00	P2026

Apparent Excessive Contributions from Committees

Contributor Name	Date	Amount	Election
NEPA Next PAC	3/25/25	\$5,000.00	P2026
NEPA Next PAC	12/31/25	\$1,500.00	P2026

Contributions from Possible Unregistered Organizations

Contributor Name	Date	Amount	Election
DiMaio For Assembly	12/12/25	\$1,000.00	P2026

**Joint Fundraising Transfers Exceed Memo Entries
Kean for Congress Inc. (C00703058)**

Kean Victory Fund

Report	Transfers	Memo Entries
2025 April Quarterly	\$55,848.01	\$55,848.01
2025 July Quarterly	\$39,639.49	\$41,600.00
2025 October Quarterly	\$27,767.55	\$28,075.00
2025 Year-End	\$51,193.75	\$0.00
Total	\$174,448.80	\$125,523.01

Defend Our Majority

Report	Transfers	Memo Entries
2025 April Quarterly	\$100,540.33	\$98,181.77
2025 July Quarterly	\$62,454.90	\$88,758.83
2025 Year-End	\$71,547.51	\$0.00
Total	\$234,542.74	\$186,940.60

Grow the Majority

Report	Transfers	Memo Entries
2025 April Quarterly	\$137,342.04	\$156,232.43
2025 July Quarterly	\$175,995.39	\$208,728.61
2025 October Quarterly	\$53,757.79	\$66,228.36
2025 Year-End	\$105,000.00	\$0.00
Total	\$472,095.22	\$431,189.40

Emmer Majority Builders

Report	Transfers	Memo Entries
2025 April Quarterly	\$32,728.18	\$31,093.06
2025 July Quarterly	\$66,345.52	\$85,530.30
2025 October Quarterly	\$40,968.36	\$49,264.56
2025 Year-End	\$37,498.04	\$0.00
Total	\$177,540.10	\$165,887.92