

<b>Records responsive to request</b>	<b>Provided/Denied /Redacted</b>	<b>Nature of Denial/Redaction</b>
Complaint (5 pages); Cover letter to each Respondent (2 pages); Affidavit and Waiver of Hearing for each Respondent (4 pages) dated February 21, 2024.	Provided	
March 4, 2024 email exchange between ELEC and Pam Richmond (1 page)	Provided with Redaction	Personal email address redacted; reasonable expectation of privacy
March 6, 2024 telephone conversation record between Kelley Keane-Dawes and Respondent Nicastro (1 page).	Provided with Redaction	Personal email address redacted; reasonable expectation of privacy
March 6, 2024 email between ELEC and Respondent Nicastro with attached letter (2 pages).	Provided with Redaction	Personal email address redacted; reasonable expectation of privacy
April 17, 2024 email exchange between ELEC and Respondents' counsel (2 pages)	Provided	
April 17, 2024 telephone conversation record between Kelley Keane-Dawes and Respondents' counsel (1 page)	Provided	
April 17, 2024 email exchange between ELEC and Respondents' counsel with letter of representation (3 pages).	Provided	
April 30, 2024 email and corrected email between ELEC and Respondents' counsel (4 pages).	Provided	
May 2, 2024 email exchange between ELEC and Respondents' counsel (3 pages).	Provided	
May 16, 2024 email exchange between ELEC and Respondents' counsel (1 page).	Provided	
Memo to Acting Legal Director Amanda S. Haines from Assistant Legal Counsel Kelley Keane-Dawes	Denied	N.J.S.A. 47:1A-1.1 (Advisory, Consultative, Deliberative; Attorney-client)
June 14, 2024 email exchange between ELEC, Respondents' counsel and two individuals associated with Respondent Committee with attached penalty letter (5 pages).	Provided with Redaction	Personal email addresses redacted; reasonable expectation of privacy
June 18, 2024 and June 19, 2024 email exchange between ELEC, Respondents' counsel and two individuals associated with Respondent Committee (6 pages)	Provided with Redaction	Personal email addresses redacted; reasonable expectation of privacy
July 3, 2024 telephone conversation record between Kelley Keane-Dawes and Respondents' counsel (1 page)	Provided	
July 3, 2024 email between ELEC and Respondents' counsel (1 page)	Provided	
July 8, 2024 email from ELEC to Respondents' counsel (1 page)	Provided	
Attachments to July 8, 2024 email: PNC Bank records for Promoting Responsible Government	Denied	N.J.S.A. 47:1A-1.1 (Financial information); reasonable expectation of privacy

July 22, 2024 email from ELEC to Respondents' counsel with attached penalty letter (3 pages)	Provided	
August 12, 2024 telephone conversation record between Kelley Keane-Dawes and Respondents' Counsel (1 page).	Provided	
Reports filed by Respondent Committee in response to the Complaint: 2022Q1; 2022Q1 Amendment 1; 2022Q1 Amendment 2; 2022Q1 Amendment 3; 2022Q1 Amendment 4; 2022Q2; 2022Q2 Amendment 1; 2022Q2 Amendment 2; 2022Q3; 2022Q3 Amendment 1; 2022Q4; 2022Q4 Amendment 1 (72 pages)	Provided	

NEW JERSEY ELECTION LAW ENFORCEMENT COMMISSION  
P.O. Box 185  
Trenton, New Jersey 08625-0185

NEW JERSEY ELECTION LAW  
ENFORCEMENT COMMISSION,

COMPLAINT AND NOTICE  
OF OPPORTUNITY FOR A HEARING

Complainant,

v.

DUPLICATE

PROMOTING RESPONSIBLE  
GOVERNMENT,  
a Continuing Political Committee,

C-K 1300 0012 22-Q2022

and

RENEE NICASTRO,  
Organizational Treasurer,

Respondents.

PLEASE TAKE NOTICE that the New Jersey Election Law Enforcement Commission (**Commission**) hereby files a Complaint against Promoting Responsible Government (**Respondent Committee**) and Renee Nicastro (**Respondent Nicastro**) and offers Respondents the opportunity for a hearing pursuant to the Administrative Procedure Act, N.J.S.A. 52:14B-1 et seq., to determine whether Respondents failed to comply with the New Jersey Campaign Contributions and Expenditures Reporting Act, N.J.S.A. 19:44A-1 et seq. (**Campaign Act**) and N.J.A.C. 19:25-1 et seq. (**Commission Regulations**), and whether penalties should be imposed.

The Commission by way of Complaint alleges:

## COUNT ONE

### PROPOSED FINDINGS OF FACT:

1. Respondent Committee is a continuing political committee in New Jersey.
2. Respondent Committee designated Respondent Nicastro as organizational treasurer on the Form D-4 filed August 29, 2013 and reported the establishment of a depository account named "Promoting Responsible Government" (**depository**).
3. Respondent Committee and Respondent Nicastro will be referred to collectively as Respondents.
4. Upon information and belief, between January 1, 2022 and December 31, 2022, Respondents deposited 26 contributions into the depository totaling \$28,518.87 and made 12 expenditures from the depository totaling \$17,738.74.
5. As of the date of this Complaint, Respondents have not filed quarterly reports for calendar year 2022 and have not reported any contributions received or expenditures made in 2022.

### PROPOSED CONCLUSIONS OF LAW:

6. Respondent Committee was at all times relevant to this Complaint a continuing political committee as defined at N.J.S.A. 19:44A-3n, and therefore was subject to the requirements of the Campaign Act and Commission Regulations.
7. Respondent Nicastro was at all times relevant to this Complaint the organizational treasurer for Respondent Committee, and therefore was subject to the requirements of the Campaign Act and Commission Regulations.
8. Respondents were required, pursuant to N.J.S.A. 19:44A-8 and N.J.A.C. 19:25-9.1 to report all contributions received and expenditures made, as follows:
  - a. Transactions between January 1, 2022 and March 31, 2022 were required to be reported on the 2022 first quarterly report on April 18, 2022;
  - b. Transactions between April 1, 2022 and June 30, 2022 were required to be reported on the 2022 second quarterly report on July 15, 2022;
  - c. Transactions between July 1, 2022 and September 30, 2022 were required to be reported on the 2022 third quarter report on October 17, 2022; and

- d. Transaction between October 1, 2022 and December 31, 2022 were required to be reported on the 2022 fourth quarterly report on January 17, 2023.
9. Pursuant to N.J.S.A. 19:44A-8 and N.J.A.C. 19:25-10.2, for each contribution exceeding \$300.00 received during a reporting period, Respondents were required to include the (1) date of receipt; (2) contribution amount; (3) contributor's name; and (4) contributor's address. Where the contributor was an individual, N.J.A.C. 19:25-10.2A required Respondents to include (5) contributor's occupation and (6) the name and address of his or her employer.
  10. Pursuant to N.J.S.A. 19:44A-8 and N.J.A.C. 19:25-10.3, Respondents were required to report the sum of contributions of \$300 or less for each reporting period.
  11. For each expenditure made during a reporting period, Respondents were required, pursuant to N.J.S.A. 19:44A-8 and 19:25-12.2, to report the date the expenditure was made, the full name and address of the payee, the purpose and amount, and the number of the check.
  12. Respondents violated N.J.S.A. 19:44A-8, N.J.A.C. 19:25-9.1, 19:25-10.2, 19:25-10.2A, and 19:25-10.3 by failing to report 26 contributions totaling \$28,518.87 on 2022 quarterly reports.
  13. Respondents violated N.J.S.A. 19:44A-8, N.J.A.C. 19:25-9.1, and N.J.A.C. 19:25-12.2 by failing to report 12 expenditures totaling \$17,738.74 on 2022 quarterly reports.
  14. Respondents are each subject to imposition by the Commission of the penalties prescribed by N.J.S.A. 19:44A-22 and N.J.A.C. 19:25-17.1 et seq., which penalties may not be more than \$9,800.00 for each reporting transaction not reported in the manner or time prescribed by the Campaign Act or Commission Regulations.

## COUNT TWO

### PROPOSED FINDINGS OF FACT:

15. The Proposed Findings of Fact contained in Count One are repeated and incorporated herein.
16. Upon information and belief, Respondents made or incurred three expenditures to a single vendor between April 1, 2022 and June 7, 2022 to defeat candidates in the 2022 primary election, totaling \$7,805.
17. Respondents did not file a notice of each expenditure within 48 hours or at any time prior to the 2022 primary election.


PROPOSED CONCLUSIONS OF LAW:

18. The Proposed Conclusions of Law contained in Count One are repeated and incorporated herein.
19. Respondents were required, pursuant to N.J.S.A. 19:44A-8 and N.J.A.C. 19:25-9.4, to report within 48 hours expenditures in excess of \$1,900.00, or aggregate expenditures in excess of \$1,900.00, made, incurred or authorized between April 1, 2022 and June 7, 2022 to support or defeat a candidate in the 2022 primary election, except that expenditures prior to May 25, 2022 could have been reported together on a notice no later than May 27, 2022 (**48-hour expenditures**).
20. Respondents violated N.J.S.A. 19:44A-8 and N.J.A.C. 19:25-9.4 by failing to file a notice of the 48-hour expenditures described in paragraph 16.
21. Respondents are each subject to imposition by the Commission of the penalties prescribed by N.J.S.A. 19:44A-22 and N.J.A.C. 19:25-17.1 et seq., which penalties may not be more than \$9,800.00 for each reporting transaction not reported in the manner or time prescribed by the Campaign Act or Commission Regulations.

OPPORTUNITY FOR HEARING:

Respondents have the opportunity for a hearing pursuant to N.J.A.C. 19:25-17.1. To effectuate that opportunity, a hearing must be requested in writing. Respondents may appear personally or by attorney. However, if Respondents fail to file a written answer with the Commission within 20 days of service of this Complaint, the Commission will be empowered to enter a Final Decision, including imposition of a monetary penalty, pursuant to N.J.A.C. 19:25-17.1A.

NEW JERSEY ELECTION LAW  
ENFORCEMENT COMMISSION

BY:   
Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel

DATE: February 21, 2024

Rob Nicastro, Chairperson, on behalf of Promoting Responsible Government

Renee Nicastro, Organizational Treasurer



*State of New Jersey*

**ELECTION LAW ENFORCEMENT COMMISSION**

THOMAS H. PROL  
Chairman

RYAN PETERS  
Commissioner

NORMA R. EVANS  
Commissioner

JON-HENRY BARR  
Commissioner

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

(609) 292-8700

Website: [www.elec.nj.gov/](http://www.elec.nj.gov/)

JOSEPH W. DONOHUE  
Acting Executive Director

STEPHANIE A. OLIVO  
Compliance Director

AMANDA S. HAINES  
Acting Legal Director

EDWIN R. MATTHEWS  
Legal Counsel

February 21, 2024

Rob Nicastro, Chairperson  
Promoting Responsible Government  
P.O. Box 45  
Howell, NJ 07731

Re: ELEC v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022

Dear Mr. Nicastro:

The Election Law Enforcement Commission (ELEC) has issued a Complaint and Notice of Opportunity for a Hearing against Promoting Responsible Government and Renee Nicastro. Enclosed is the Complaint and a form entitled "Affidavit and Waiver of Hearing" (waiver). Please be advised that any Respondent may be represented by an attorney.

To exercise the opportunity for a hearing, Respondents must submit a written hearing request in addition to any answer or responsive pleading. ELEC will then transmit this case to the Office of Administrative Law (OAL) and the OAL will provide notice of the proceedings to all parties. The hearing will be conducted by an Administrative Law Judge who will prepare written recommendations for a Final Decision by ELEC.

In the alternative, a hearing may be waived by submitting the enclosed waiver. If each Respondent submits a waiver, the Complaint and the waivers will then be presented to ELEC for a Final Decision.

If ELEC determines that Respondents have violated the Campaign Act, the costs associated with service of the Complaint will be added to whatever penalty the Commission imposes. Should you have any questions, please contact me at (609) 690-4651 or [kelley.keane-dawes@elec.nj.gov](mailto:kelley.keane-dawes@elec.nj.gov).

NEW JERSEY ELECTION LAW  
ENFORCEMENT COMMISSION

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel

Enc.





*State of New Jersey*

**ELECTION LAW ENFORCEMENT COMMISSION**

THOMAS H. PROL  
Chairman

RYAN PETERS  
Commissioner

NORMA R. EVANS  
Commissioner

JON-HENRY BARR  
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Respond to:  
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JOSEPH W. DONOHUE  
Acting Executive Director

STEPHANIE A. OLIVO  
Compliance Director

AMANDA S. HAINES  
Acting Legal Director

EDWIN R. MATTHEWS  
Legal Counsel

February 21, 2024

Renee Nicastro, Organizational Treasurer  
Promoting Responsible Government  
15 Winged Foot Rd.  
Jackson, NJ 08527

Re: ELEC v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022

Dear Ms. Nicastro:

The Election Law Enforcement Commission (ELEC) has issued a Complaint and Notice of Opportunity for a Hearing against Promoting Responsible Government and Renee Nicastro. Enclosed is the Complaint and a form entitled "Affidavit and Waiver of Hearing" (waiver). Please be advised that any Respondent may be represented by an attorney.

To exercise the opportunity for a hearing, Respondents must submit a written hearing request in addition to any answer or responsive pleading. ELEC will then transmit this case to the Office of Administrative Law (OAL) and the OAL will provide notice of the proceedings to all parties. The hearing will be conducted by an Administrative Law Judge who will prepare written recommendations for a Final Decision by ELEC.

In the alternative, a hearing may be waived by submitting the enclosed waiver. If each Respondent submits a waiver, the Complaint and the waivers will then be presented to ELEC for a Final Decision.

If ELEC determines that Respondents have violated the Campaign Act, the costs associated with service of the Complaint will be added to whatever penalty the Commission imposes. Should you have any questions, please contact me at (609) 690-4651 or [kelley.keane-dawes@elec.nj.gov](mailto:kelley.keane-dawes@elec.nj.gov).

Enc.

NEW JERSEY ELECTION LAW  
ENFORCEMENT COMMISSION

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel

C-K 1300 0012 22-Q2022

PROMOTING RESPONSIBLE GOVERNMENT,  
a Continuing Political Committee,

RENEE NICASTRO,  
Organizational Treasurer.

STATE OF NEW JERSEY )  
 )  
COUNTY OF )

1. I am the Chairperson of the above-named committee and I am authorized to act on the committee's behalf.
2. The committee does not contest the violations of the New Jersey Campaign Contributions and Expenditures Reporting Act (N.J.S.A. 19:44A-1 to -47) (Campaign Act) alleged in the Complaint and Notice of Opportunity for a Hearing.
3. I understand that this is a public document and request that the Commission consider the following facts for purposes of possible mitigation (additional sheets of paper may be attached):

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(See Over)

4. The committee has/has not (circle one) been previously reprimanded or fined by the Election Law Enforcement Commission. (If the committee was previously reprimanded or fined, set forth below the year and election and penalty imposed.):

\_\_\_\_\_

5. Pursuant to N.J.S.A. 19:44A-22 and N.J.A.C. 19:25-17.1 et seq., the Commission is empowered to impose a penalty against the committee of not more than \$9,800.00 for each violation of the Campaign Act.
6. On behalf of the committee, I decline and waive any hearing or appearance in this Complaint and request that the Commission consider the contents of this document in reaching its Final Decision.

\_\_\_\_\_  
(Printed name) \_\_\_\_\_

Sworn and Subscribed to  
(affirmed) before me this

\_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
Notary Public

My Commission Expires \_\_\_\_\_, \_\_\_\_\_.

MAIL TO:

NEW JERSEY ELECTION LAW ENFORCEMENT COMMISSION

P.O. Box 185

Trenton, New Jersey 08625-0185

NEW JERSEY ELECTION LAW  
ENFORCEMENT COMMISSION

C-K 1300 0012 22-Q2022

v.

PROMOTING RESPONSIBLE GOVERNMENT.  
a Continuing Political Committee,

and

RENEE NICASTRO,  
Organizational Treasurer.

AFFIDAVIT AND WAIVER OF HEARING  
Renee Nicastro

STATE OF NEW JERSEY       )  
  )  
COUNTY OF \_\_\_\_\_)

I, Renee Nicastro, of full age and being duly sworn according to law on oath depose and say:

1. I do not contest the violations of the New Jersey Campaign Contributions and Expenditures Reporting Act (N.J.S.A. 19:44A-1 to -47) (Campaign Act) alleged in the Complaint and Notice of Opportunity for a Hearing in the above-captioned matter.

2. I understand that this is a public document and request that the Commission consider the following facts for purposes of possible mitigation (additional sheets of paper may be attached):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. I have/have not (circle one) been previously reprimanded or fined by the Election Law Enforcement Commission. (If Respondent was previously reprimanded or fined, set forth below the year and election and penalty imposed.):

\_\_\_\_\_

(See Over)

4. Pursuant to N.J.S.A. 19:44A-22 and N.J.A.C. 19:25-17.1 *et seq.*, the Commission is empowered to impose a penalty against me of not more than \$9,800.00 for each violation of the Campaign Act.
5. I decline and waive any hearing or appearance in this Complaint and request that the Commission consider the contents of this document in reaching its Final Decision.

\_\_\_\_\_  
Signature of Respondent  
Rcnee Nicastro

Sworn and Subscribed to  
(affirmed) before me this

\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
Notary Public

My Commission Expires \_\_\_\_\_.

MAIL TO:

NEW JERSEY ELECTION LAW ENFORCEMENT COMMISSION

P.O. Box 185

Trenton, New Jersey 08625-0185

## Keane-Dawes, Kelley [ELEC]

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**From:** Pamela Richmond <[REDACTED]>  
**Sent:** Monday, March 4, 2024 10:17 AM  
**To:** Keane-Dawes, Kelley [ELEC]  
**Subject:** [EXTERNAL] Re: PRG Complaint

Good morning, thank you for getting back to me so quickly.  
I will pass this information on-  
have a great day  
Pam

On Mar 4, 2024, at 9:35 AM, Keane-Dawes, Kelley [ELEC] <kelley.keane-dawes@elec.nj.gov> wrote:

Good Morning Ms. Richmond,

I am sorry we keep missing each other on the phone. Hopefully, this email will answer your questions. In your voicemail you requested an extension of time to answer the PRG complaint. I understand that you are the current treasurer for the organization. However, I can only discuss the case with the named Respondents or their legal counsel. If either the chairperson of Promoting Responsible Government (Mr. Nicastro), Ms. Renee Nicastro or their legal counsel contact me to request an extension I will be able to review that request and respond quickly. If you have questions about this, please feel free to contact me.

Sincerely,

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel  
Election Law Enforcement Commission  
25 South Stockton Street  
5<sup>th</sup> Floor  
P.O. Box 185  
Trenton, NJ 08608  
T: 609 292 8700  
T: 609 690 4651 (Direct)  
F: 609 777 1457

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New Jersey Election Law Enforcement Commission  
**Telephone Conversation Record**  
Advisory, Consultative Deliberative Material

**Conversation With:** Renee Nicastro

**Case ID:** C-K 1300 0012 22-Q2022

**Represented:**

**Telephone:**

**Municipality:**

**Date:** 3.6.24

Party Called Me: X	I Called Party:	Party Called & I Returned:
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**Other Party Said:**

**I Said:**

Hi Kelley. I got information from Pam Richmond saying I have to call to get an extension?	Hi Ms. Nicastro. Right either yourself or Mr. Nicastro can request an extension to answer the complaint.
Well. I just don't have anything to do with this anymore really. I'd like an extension.	Alright, would 30 days be ok? Will that give you enough time to get up to speed?
Yes, that's fine.	Ok, I can email you confirmation of this. What's your email address?
[REDACTED]	Ok, I will send that to you as confirmation.
Thank you.	You're welcome and if you have any questions feel free to contact me. Thanks

PREPARED BY: Kelley Keane-Dawcs

**Keane-Dawes, Kelley [ELEC]**

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**From:** Keane-Dawes, Kelley [ELEC]  
**Sent:** Wednesday, March 6, 2024 3:34 PM  
**To:** [REDACTED]  
**Subject:** Elec v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022  
**Attachments:** PRG Letter Confirming Extension to Answer.pdf

Hi Ms. Nicastro,

Attached is the letter confirming the extension of time to answer the Complaint to 4/19/24. If you have any questions please feel free to call or email me. Thanks.

Best Regards

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel  
Election Law Enforcement Commission  
25 South Stockton Street  
P.O. Box 185  
Trenton, NJ 08625  
T: 609 690 4651  
or  
T: 609 292 8700 Ext. 14651

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*State of New Jersey*

**ELECTION LAW ENFORCEMENT COMMISSION**

THOMAS H. PROL  
Chairman

RYAN PETERS  
Commissioner

NORMA R. EVANS  
Commissioner

JON-HENRY BARR  
Commissioner

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

(609) 292-8700

Website: [www.elcec.nj.gov](http://www.elcec.nj.gov)

JOSEPH W. DONOHUE  
Acting Executive Director

STEPHANIE A. OLIVO  
Compliance Director

AMANDA S. HAINES  
Acting Legal Director

EDWIN R. MATTHEWS  
Legal Counsel

March 6, 2024

**SENT VIA EMAIL**

Renee Nicastro  
[REDACTED]

Re: ELEC v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022

Dear Ms. Nicastro:

This letter confirms the extension to Answer the Complaint and a request hearing for the above referenced case to April 19, 2024.

If you or Promoting Responsible Government choose to retain counsel, please have them contact me via email or phone. If you have any questions or concerns, please feel free to contact me at (609) 690-4651 or email at [kelly.keane-dawes@elcec.nj.gov](mailto:kelly.keane-dawes@elcec.nj.gov).

Sincerely,

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel

## **Keane-Dawes, Kelley [ELEC]**

---

**From:** Keane-Dawes, Kelley [ELEC]  
**Sent:** Wednesday, April 17, 2024 8:53 AM  
**To:** Bruce Padula  
**Subject:** RE: ELEC v. Promoting Responsible Government

Good Morning,  
I am free from 10:30am onwards. I look forward to hearing from you.

Best,

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel  
Election Law Enforcement Commission  
25 South Stockton Street  
P.O. Box 185  
Trenton, NJ 08625  
T: 609 690 4651  
or  
T: 609 292 8700 Ext. 14651

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**From:** Bruce Padula <bpadula@cgajlaw.com>  
**Sent:** Wednesday, April 17, 2024 8:34 AM  
**To:** Keane-Dawes, Kelley [ELEC] <kelley.keane-dawes@elec.nj.gov>  
**Subject:** [EXTERNAL] ELEC v. Promoting Responsible Government

Kelley,

You may recall we previously worked on and resolved ELEC v. Casagrande together. I was contacted last night about the attached complaint and was hoping I could speak to you today about it. I think we should be able to resolve this one. When is a good time for to talk and what is the best way to reach you?

Bruce

New Jersey Election Law Enforcement Commission  
**Telephone Conversation Record**  
Advisory, Consultative Deliberative Material

**Conversation With:** Bruce Padula

**Case ID:** C-K 1300 0012 22-Q2022

**Represented:**

**Telephone:** 201 390 6598

**Municipality:**

**Date:** 4/17/24

Party Called Me: X	I Called Party:	Party Called & I Returned:
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**Other Party Said:**

**I Said:**

Hi Kelley this is Bruce Padula calling about the Promoting responsible government. I know when we worked together before it was just a late filing case. I believe they have filed the required reports and I think we should be able to settle this without a hearing. I just wanted to know what the Commission would like to do and if you have any numbers for me.	Ok, yes. I do see that they filed the missing reports. Currently the reports are being reviewed. After the review is complete I will be able to tell you if there is still any information missing and any penalty recommendation.
Ok, that sounds good. I know they previously received an extension to answer the complaint. Should we do another extension.	Sure we can definitely do that. I think 30 days will put us in a good spot. At that point the review should be complete and I should be able to give you a penalty recommendation. If not we can decide how to move forward at that time.
Great. I will send you an email confirming the extension and you will call or email me after the review.	Yes. Sounds good.
Thank you.	Your welcome.

PREPARED BY: Kelley Keane-Dawes

**Keane-Dawes, Kelley [ELEC]**

---

**From:** Keane-Dawes, Kelley [ELEC]  
**Sent:** Wednesday, April 17, 2024 12:12 PM  
**To:** Bruce Padula  
**Subject:** RE: [EXT] Letter of Representation Promoting Responsible Government

Thank you. Also, I agree to the extension of time to answer the complaint to 5/19/24 and I will reach out to you when the review of the submitted reports are due.

Best,

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel  
Election Law Enforcement Commission  
25 South Stockton Street  
P.O. Box 185  
Trenton, NJ 08625  
T: 609 690 4651  
or  
T: 609 292 8700 Ext. 14651

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**From:** Bruce Padula <bpadula@cgajlaw.com>  
**Sent:** Wednesday, April 17, 2024 12:09 PM  
**To:** Keane-Dawes, Kelley [ELEC] <kelley.keane-dawes@elec.nj.gov>  
**Subject:** [EXTERNAL] Re: [EXT] Letter of Representation Promoting Responsible Government

See attached

---

**From:** Keane-Dawes, Kelley [ELEC] <kelley.keane-dawes@elec.nj.gov>  
**Sent:** Wednesday, April 17, 2024 12:06 PM  
**To:** Bruce Padula  
**Subject:** [EXT] Letter of Representation Promoting Responsible Government

Hi Bruce,

I forgot to ask you to send a letter of representation indicating if/that you represent both respondents in the matter. You can send that to me via email. Thanks.

Best Regards,

Kelley Keane-Dawes, Esq.

Assistant Legal Counsel

Election Law Enforcement Commission

25 South Stockton Street

P.O. Box 185

Trenton, NJ 08625

T: 609 690 4651

or

T: 609 292 8700 Ext. 14651

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CLEARY | GIACOBBE | ALFIERI | JACOBS LLC

BRUCE W. PADULA, Partner  
bpadula@cgajlaw.com

Reply to: Matawan Office

April 17, 2024

**Via Email Only**

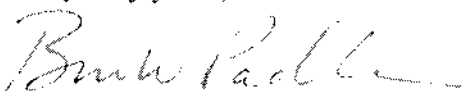
Kelley Kearne-Dawes, Esq.  
Election Law Enforcement Commission  
P.O. Box 185  
Trenton, NJ 08625-0185

Re: ELEC v. Promoting Responsible Government et al.  
Docket Number: C-K 1300 0012 22-Q2022

Dear DAG Kearne-Dawes:

This confirms our conversation that I have been retained to represent both respondents in the above-referenced matter.

Very truly yours,



Bruce W. Padula

**Keane-Dawes, Kelley [ELEC]**

---

**From:** Keane-Dawes, Kelley [ELEC]  
**Sent:** Tuesday, April 30, 2024 9:52 AM  
**To:** Bruce Padula  
**Subject:** ELEC v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022

Good Morning,

Below is the list of items that have not been reported completely for the quarterly reports in question. Respondents may amend the reports to update and report the transactions completely.

Please refer to N.J.A.C. 19:25-10.2, 10.2A, and 12.2 for explanations of complete reporting of contributions and expenditures.

Please refer to N.J.A.C. 19:25-11.10 for an explanation of how partnership contributions must be reported.

As for the items on this list that have not been reported, if you need copies of the bank records to identify these transactions please let me know.

**2022-Q1:**

- Incomplete reporting of two contributions totaling \$2,400.00.
- Contribution of \$500.00 received on March 30, 2022 (is in bank records but not reported).
- Incomplete reporting of two expenditures totaling \$449.00.

**2022-Q2:**

- Incomplete reporting of four contributions totaling \$11,818.87.
- One contribution of \$1,000 received on April 11, 2022 and one contribution of \$500 received on May 4, 2022, in bank records but not reported.
- Incomplete reporting of three expenditures totaling \$5,090.

**2022-Q3**

- Incomplete reporting of one contribution of \$5,000.
- Incomplete reporting of two expenditures totaling \$3,962.

If you have any questions please feel free to email or call me. Thanks.

Best Regards,

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel  
Election Law Enforcement Commission  
25 South Stockton Street  
5<sup>th</sup> Floor  
P.O. Box 185  
Trenton, NJ 08608  
T: 609 292 8700



T: 609 690 4651 (Direct)

F: 609 777 1457

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**Keane-Dawes, Kelley [ELEC]**

---

**From:** Keane-Dawes, Kelley [ELEC]  
**Sent:** Tuesday, April 30, 2024 10:09 AM  
**To:** Bruce Padula  
**Subject:** \*CORRECTION- ELEC v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022

\*Hi, there was an error in the first email I sent you. Sorry about that. I have highlighted the correction in the email below. Everything else is accurate.

Below is the list of items that have not been reported completely for the quarterly reports in question. Respondents may amend the reports to update and report the transactions completely.

Please refer to N.J.A.C. 19:25-10.2, 10.2A, and 12.2 for explanations of complete reporting of contributions and expenditures.

Please refer to N.J.A.C. 19:25-11.10 for an explanation of how partnership contributions must be reported.

As for the items on this list that have not been reported, if you need copies of the bank records to identify these transactions please let me know.

**2022-Q1:**

- Incomplete reporting of three contributions totaling \$2,400.00.
- Contribution of \$500.00 received on March 30, 2022 (is in bank records but not reported).
- Incomplete reporting of two expenditures totaling \$449.00.

**2022-Q2:**

- Incomplete reporting of four contributions totaling \$11,818.87.
- One contribution of \$1,000 received on April 11, 2022 and one contribution of \$500 received on May 4, 2022, in bank records but not reported.
- Incomplete reporting of three expenditures totaling \$5,090.

**2022-Q3**

- Incomplete reporting of one contribution of \$5,000.
- Incomplete reporting of two expenditures totaling \$3,962.

If you have any questions please feel free to email or call me. Thanks.

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel  
Election Law Enforcement Commission  
25 South Stockton Street  
P.O. Box 185  
Trenton, NJ 08625  
T: 609 690 4651  
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T: 609 292 8700 Ext. 14651

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## Keane-Dawes, Kelley [ELEC]

---

**From:** Keane-Dawes, Kelley [ELEC]  
**Sent:** Thursday, May 2, 2024 10:25 AM  
**To:** Bruce Padula  
**Subject:** RE: [EXT] \*CORRECTION- ELEC v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022

Hi Bruce,

No, it still isn't correct. An amended report for the 2022-Q1 has been filed. But I don't see anything for Q2 or Q3. Also, the amendments made for Q1 are not complete. In my previous email I referenced N.J.A.C. 19:25-10.2, 10.2A, and 12.2 because these regulations give a detailed explanation of what is required for reporting contributions and expenditures. For example, when a contributor is an individual the committee not only has to report the contributor's address but also their employer, employer address and occupation. When reporting an expenditure, a full address is required. Finally, the missing contribution I referred to in my prior email was not added to the amended report.

Please let me know if you have any questions about this and if you want to talk about it feel free to call. Thanks.

Best,

**From:** Bruce Padula <bpadula@cgajlaw.com>  
**Sent:** Thursday, May 2, 2024 10:07 AM  
**To:** Keane-Dawes, Kelley [ELEC] <kelley.keane-dawes@elec.nj.gov>  
**Subject:** [EXTERNAL] Re: [EXT] \*CORRECTION- ELEC v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022

Kelley,

I'm told the amendment has been filed. Is it correct now?

Bruce

**From:** Keane-Dawes, Kelley [ELEC] <kelley.keane-dawes@elec.nj.gov>  
**Sent:** Tuesday, April 30, 2024 10:08 AM

**To:** Bruce Padula

**Subject:** [EXT] \*CORRECTION- ELEC v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022

\*Hi, there was an error in the first email I sent you. Sorry about that. I have highlighted the correction in the email below. Everything else is accurate.

Below is the list of items that have not been reported completely for the quarterly reports in question. Respondents may amend the reports to update and report the transactions completely.

Please refer to N.J.A.C. 19:25-10.2, 10.2A, and 12.2 for explanations of complete reporting of contributions and expenditures.

Please refer to N.J.A.C. 19:25-11.10 for an explanation of how partnership contributions must be reported.

As for the items on this list that have not been reported, if you need copies of the bank records to identify these transactions please let me know.

#### 2022-Q1:

- Incomplete reporting of three contributions totaling \$2,400.00.
- Contribution of \$500.00 received on March 30, 2022 (is in bank records but not reported).
- Incomplete reporting of two expenditures totaling \$449.00.

#### 2022-Q2:

- Incomplete reporting of four contributions totaling \$11,818.87.
- One contribution of \$1,000 received on April 11, 2022 and one contribution of \$500 received on May 4, 2022, in bank records but not reported.
- Incomplete reporting of three expenditures totaling \$5,090.

#### 2022-Q3

- Incomplete reporting of one contribution of \$5,000.
- Incomplete reporting of two expenditures totaling \$3,962.

If you have any questions please feel free to email or call me. Thanks.

Kelley Keane-Dawes, Esq.

Assistant Legal Counsel

Election Law Enforcement Commission

25 South Stockton Street

P.O. Box 185

Trenton, NJ 08625

T: 609 690 4651

or

T: 609 292 8700 Ext. 14651

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**Keane-Dawes, Kelley [ELEC]**

---

**From:** Bruce Padula <bpadula@cgajlaw.com>  
**Sent:** Thursday, May 16, 2024 2:32 PM  
**To:** Keane-Dawes, Kelley [ELEC]  
**Subject:** [EXTERNAL] Re: [EXT] RE: Promoting Responsible Government

Thank you

---

**From:** Keane-Dawes, Kelley [ELEC] <kelly.keane-dawes@elec.nj.gov>  
**Sent:** Thursday, May 16, 2024 9:24 AM  
**To:** Bruce Padula  
**Subject:** [EXT] RE: Promoting Responsible Government

Hi Bruce,

No, you don't have to file an Answer tomorrow. I understand it might take some time for PRC to get the missing information (ex. Employer information) from contributors and update their filings. I will extend the time to Answer another 30 days to 6/17/24 and we can see where we are at that time.

In the meantime, I will draft penalty recommendations for two options. Option 1: All the missing information is reported and the reports are deemed late and complete and Option 2: The missing or incorrect information is not reported correctly and the reports are deemed late and incomplete. This will give you and your clients an idea of the numbers we are working with. I should be able to get you the two recommendations by next week. Thanks.

Best,

**From:** Bruce Padula <bpadula@cgajlaw.com>  
**Sent:** Thursday, May 16, 2024 6:03 AM  
**To:** Keane-Dawes, Kelley [ELEC] <kelly.keane-dawes@elec.nj.gov>  
**Subject:** [EXTERNAL] Promoting Responsible Government

Kelley,

I just wanted to check in and see where we were at. Our Answer is due tomorrow and I communicated with my client after our last discussion. Do I have to file an Answer tomorrow or can we resolve this?

Thanks. I am on the road most of today and can be reached at 201-390-6598.

Bruce

## Keane-Dawes, Kelley [ELEC]

---

**From:** Keane-Dawes, Kelley [ELEC]  
**Sent:** Friday, June 14, 2024 11:30 AM  
**To:** Bruce Padula  
**Cc:** Rob Nicastro; Pam  
**Subject:** RE: [EXT] RE: Promoting Responsible Government  
**Attachments:** Letter confirming penalty recommendation 6.14.24.pdf

Hi Bruce,

I have reviewed the amended filings there is still some missing information. See below.

I have also attached a penalty recommendation letter that gives two recommendations. The first penalty recommended assumes all the information is reported correctly and the reports are amended to reflect the correction of the information listed below. The second penalty recommendation reflects the amendments that have been made to date and assumes the information below is not corrected. Please let me know if your client wants to make changes pursuant to the information listed below. I will extend the time to answer another 2 weeks to 7/8/24, that way it gives enough time for you to discuss with your client. If you have any questions about any of this feel free to contact me.

Three contributions totaling \$2,000; in the bank records but not reported in filings (if you need the bank records and I can give you a copy):

- 2022-Q1: one contribution of \$500 received on 3/20/22
- 202-Q2: one contribution of \$1,000 received on 4/11/22 and one contribution of \$500 received on 5/4/22

Failing to report contribution information for two contributions drawn from an LLC/Partnership totaling \$1,500:

- 2022-Q2: contributions from Holman Frenia Allision P.C.
  - See N.J.A.C. 19:25-11.10 for how to report these transactions

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel  
Election Law Enforcement Commission  
25 South Stockton Street  
P.O. Box 185  
Trenton, NJ 08625  
T: 609 690 4651  
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**From:** Bruce Padula <bpadula@cgajlaw.com>  
**Sent:** Friday, June 14, 2024 9:30 AM  
**To:** Keane-Dawes, Kelley [ELEC] <kelly.keane-dawes@elec.nj.gov>  
**Cc:** Rob Nicastro <[REDACTED]>; Pam <[REDACTED]>  
**Subject:** [EXTERNAL] Re: [EXT] RE: Promoting Responsible Government

Hi Kelley,

Hope you are well. Just following up because the Answer would now be due on Monday.

Bruce

---

**From:** Keane-Dawes, Kelley [ELEC] <kelly.keane-dawes@elec.nj.gov>  
**Sent:** Thursday, May 16, 2024 9:24 AM  
**To:** Bruce Padula  
**Subject:** [EXT] RE: Promoting Responsible Government

Hi Bruce,

No, you don't have to file an Answer tomorrow. I understand it might take some time for PRC to get the missing information (ex. Employer information) from contributors and update their filings. I will extend the time to Answer another 30 days to 6/17/24 and we can see where we are at that time.

In the meantime, I will draft penalty recommendations for two options. Option 1: All the missing information is reported and the reports are deemed late and complete and Option 2: The missing or incorrect information is not reported correctly and the reports are deemed late and incomplete. This will give you and your clients an idea of the numbers we are working with. I should be able to get you the two recommendations by next week. Thanks.

Best,

**From:** Bruce Padula <[bpadula@cgallaw.com](mailto:bpadula@cgallaw.com)>  
**Sent:** Thursday, May 16, 2024 6:03 AM  
**To:** Keane-Dawes, Kelley [ELEC] <[kelley.keane-dawes@delawarecourts.gov](mailto:kelley.keane-dawes@delawarecourts.gov)>  
**Subject:** [EXTERNAL] Promoting Responsible Government

Kelley,

I just wanted to check in and see where we were at. Our Answer is due tomorrow and I communicated with my client after our last discussion. Do I have to file an Answer tomorrow or can we resolve this?

Thanks. I am on the road most of today and can be reached at 201-390-6598.

Bruce



State of New Jersey

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Respond to:  
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Trenton, New Jersey 08625-0185

(609) 292-8700

Website: [www.elec.nj.gov/](http://www.elec.nj.gov/)

AMANDA S. HAINES  
Executive Director

JOSEPH W. DONOHUE  
Deputy Director

STEPHANIE A. OLIVO  
Compliance Director

EDWIN R. MATTHEWS  
Legal Counsel

June 14, 2024

VIA E-MAIL ONLY

Bruce W. Padula, Esq.

Cleary, Jacobbe, Alfieri, Jacobs, LLC

[bpadula@cgajlaw.com](mailto:bpadula@cgajlaw.com)

Re: ELEC v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022

Dear Mr. Padula:

I have reviewed the amended filings for your clients. There is some information still missing. I have given a more detailed explanation of the missing items in the email which accompanies this letter. In an effort to provide you with as much information about possible penalty recommendations, I have included two penalty recommendations. The first recommendation reflects all the appropriate amendments having been made and any deficiencies in the reporting having been corrected. The second recommendation reflects the amendments that have been made to date and the remaining deficiencies not being corrected.

Penalty Recommendation #1

- 1) Late reporting of 26 contributions totaling \$28,518.87: \$2,851.88
- 2) Late reporting of 12 expenditures totaling \$17,738.74: \$1,773.87
- 3) Failing to file 48-hour notice for \$1,400 contribution: \$700
- 4) Failing to file 48-hour notice for \$2,045 contribution: \$1,022.50
- 5) Failing to file 48-hour notice for \$4,360 contribution: \$2,180

The recommended penalty above totals **\$8,528.25** against Respondents jointly. Should the penalty be paid in full or partial payment received before Final Decision action, the recommended penalty would further be reduced to **\$6,822.60**.

Located at: 25 South Stockton St., 5<sup>th</sup> Floor, Trenton, New Jersey

Penalty Recommendation #2

- 1) Late reporting of 23 contributions totaling \$26,518.87: \$2,651.88
- 2) Failing to report three contributions totaling \$2,000: \$2,000
- 3) Failing to report contribution information for two contributions drawn from an LLC/Partnership totaling \$1,500: \$1,500
- 4) Late reporting of 12 expenditures totaling \$17,738.74: \$1,773.87
- 5) Failing to file 48-hour notice for \$1,400 contribution: \$700
- 6) Failing to file 48-hour notice for \$2,045 contribution: \$1,022.50
- 7) Failing to file 48-hour notice for \$4,360 contribution: \$2,180


The recommended penalty above totals **\$11,828.25** against Respondents jointly. Should the penalty be paid in full or partial payment received before Final Decision action, the recommended penalty would further be reduced to **\$9,462.60**.

A payment plan is available for the recommended penalty. A payment plan would require an initial payment of 20% of the penalty and four equal payments due quarterly. Staff penalty recommendations must be approved by the Commission. Payment may be made by check or money order payable to "Treasurer, State of New Jersey," or electronically at [https://www.elec.nj.gov/elec\\_cpayments.html](https://www.elec.nj.gov/elec_cpayments.html) under the "Fines" tab. Additional fees may apply when making an electronic payment. Checks or money orders should be submitted to:

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

To ensure proper credit, write the case number in the above heading on your check or money order. If you have any questions, please call me at (609) 690-4651.

Sincerely,

  
Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel

**Keane-Dawes, Kelley [ELEC]**

---

**From:** Keane-Dawes, Kelley [ELEC]  
**Sent:** Wednesday, June 19, 2024 8:15 AM  
**To:** Bruce Padula  
**Subject:** RE: [EXT] RE: [EXTERNAL] PRG update

Sure, no problem. I will be in the office next week so you can give me a call when you have a chance.

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel  
Election Law Enforcement Commission  
25 South Stockton Street  
P.O. Box 185  
Trenton, NJ 08625  
T: 609 690 4651  
or  
T: 609 292 8700 Ext. 14651

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---

**From:** Bruce Padula <bpadula@cgajlaw.com>  
**Sent:** Wednesday, June 19, 2024 6:43 AM  
**To:** Keane-Dawes, Kelley [ELEC] <kelly.keane-dawes@elec.nj.gov>  
**Subject:** Re: [EXT] RE: [EXTERNAL] PRG update

Kelley,

I had a an emergent matter filed in both Superior Court and ABC and I have to file an OTSC today. Do you think we can schedule for early next week?

Bruce

---

**From:** Keane-Dawes, Kelley [ELEC] <kelley.keane-dawes@elec.nj.gov>  
**Sent:** Tuesday, June 18, 2024 1:59 PM  
**To:** Bruce Padula  
**Subject:** [EXT] RE: [EXTERNAL] PRG update

Hi Bruce,

Do you have time for a phone call to discuss the reports? Today or tomorrow would work for me since I am out of the office Thursday and Friday. Thank, please let me know.

Best,

Kelley Keane-Dawes, Esq.

Assistant Legal Counsel

Election Law Enforcement Commission

25 South Stockton Street

P.O. Box 185

Trenton, NJ 08625

T: 609 690 4651

or

T: 609 292 8700 Ext. 14651

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From: Pam Optonline <[REDACTED]>  
Sent: Tuesday, June 18, 2024 1:32 PM  
To: Keane-Dawes, Kelley [ELEC] <kelley.keane-dawes@elec.nj.gov>  
Cc: Bruce Padula <Bpadula@cgajlaw.com>; Rob Nicastro <[REDACTED]>  
Subject: [EXTERNAL] PRG update

Good afternoon , please see the attached

I apologize if I am missing something but it appears I did report the following

- 
- 202-Q2: one contribution of \$1,000 received on 4/11/22 and one contribution of \$500 received on 5/4/22

Contributor Name HOLMAN FRENIA ALLISON			Contributor Address 1985 CEDAR BRIDGE AVE, LAKEWOOD NJ 08701
Date Received 05/04/2022	Amount \$500.00	Aggregate Amount \$1,500.00	Comments Campaign event - Dinner check #30058
<input type="checkbox"/> Currency Contribution			
Contributor Name HOLMAN FRENIA ALLISON			Contributor Address 1985 CEDAR BRIDGE AVE, LAKEWOOD NJ 08701
Date Received 05/03/2022	Amount \$1,000.00	Aggregate Amount \$1,500.00	Comments Campaign Contributions
<input type="checkbox"/> Currency Contribution			

Also, I amended & refiled the following the date was 3/30 on the bank statement

- 2022-Q1: one contribution of \$500 received on 3/20/2

please let me know

thank you

Pam

On Jun 14, 2024, at 11:29 AM, Keane-Dawes, Kelley [ELEC] <kelley.keane-dawes@elec.nj.gov> wrote:

Hi Bruce,

I have reviewed the amended filings there is still some missing information. See below.

I have also attached a penalty recommendation letter that gives two recommendations. The first penalty recommended assumes all the information is reported correctly and the reports are amended to reflect the correction of the information listed below. The second penalty recommendation reflects the amendments that have been made to date and assumes the information below is not corrected. Please let me know if your client wants to make changes pursuant to the information listed below. I will extend the time to answer another 2 weeks to 7/8/24, that way it gives enough time for you to discuss with your client. If you have any questions about any of this feel free to contact me.

Three contributions totaling \$2,000; in the bank records but not reported in filings (if you need the bank records and I can give you a copy):

1. 2022-Q1: one contribution of \$500 received on 3/20/22
2. 202-Q2: one contribution of \$1,000 received on 4/11/22 and one contribution of \$500 received on 5/4/22

Failing to report contribution information for two contributions drawn from an LLC/Partnership totaling \$1,500:

1. 2022-Q2: contributions from Holman Frenia Allision P.C.
1. See N.J.A.C. 19:25-11.10 for how to report these transactions

Kelley Keane-Dawes, Esq.

Assistant Legal Counsel

Election Law Enforcement Commission

25 South Stockton Street

P.O. Box 185

Trenton, NJ 08625

T: 609 690 4651



or

T: 609 292 8700 Ext. 14651

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**From:** Bruce Padula <[bpadula@cgajlaw.com](mailto:bpadula@cgajlaw.com)>  
**Sent:** Friday, June 14, 2024 9:30 AM  
**To:** Keane-Dawes, Kelley [ELEC] <[kelley.keane-dawes@elec.nj.gov](mailto:kelley.keane-dawes@elec.nj.gov)>  
**Cc:** Rob Nicastro <[REDACTED]>; Pam <[REDACTED]>  
**Subject:** [EXTERNAL] Re: [EXT] RE: Promoting Responsible Government

Hi Kelley,

Hope you are well. Just following up because the Answer would now be due on Monday.

Bruce

---

**From:** Keane-Dawes, Kelley [ELEC] <[kelley.keane-dawes@elec.nj.gov](mailto:kelley.keane-dawes@elec.nj.gov)>  
**Sent:** Thursday, May 16, 2024 9:24 AM  
**To:** Bruce Padula  
**Subject:** [EXT] RE: Promoting Responsible Government

Hi Bruce,

No, you don't have to file an Answer tomorrow. I understand it might take some time for PRC to get the missing information (ex. Employer information) from contributors and update their filings. I will extend the time to Answer another 30 days to 6/17/24 and we can see where we are at that time.

In the meantime, I will draft penalty recommendations for two options. Option 1: All the missing information is reported and the reports are deemed late and complete and Option 2: The missing or incorrect information is not reported correctly and the reports are deemed late and incomplete. This will give you and your clients an idea of the numbers we are working with. I should be able to get you the two recommendations by next week. Thanks.

Best,

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**From:** Bruce Padula <[bpadula@cgalilaw.com](mailto:bpadula@cgalilaw.com)>  
**Sent:** Thursday, May 16, 2024 6:03 AM  
**To:** Keane-Dawes, Kelley [ELEC] <[kelley.keane-dawes@elec.nj.gov](mailto:kelley.keane-dawes@elec.nj.gov)>  
**Subject:** [EXTERNAL] Promoting Responsible Government

Kelley,

I just wanted to check in and see where we were at. Our Answer is due tomorrow and I communicated with my client after our last discussion. Do I have to file an Answer tomorrow or can we resolve this?

Thanks. I am on the road most of today and can be reached at 201-390-6598.

Bruce

<Letter confirming penalty recommendation 6.14.24.pdf>

New Jersey Election Law Enforcement Commission  
**Telephone Conversation Record**  
Advisory, Consultative Deliberative Material

**Conversation With:** Bruce Padula

**Case ID:** C-K 1300 0012 22-Q2022

**Represented:**

**Telephone:** 201 390 6598

**Municipality:**

**Date:** 7.3.24

Party Called Me: X	I Called Party:	Party Called & I Returned:
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**Other Party Said:**

**I Said:**

Hi Kelley. I just wanted to get further information on the reports. You said there's still missing information?	Yes, and I got an email from Pam Richmond indicating they reported the missing transactions, you were copied on that right?
Yes I was.	Ok, so what she attached is not what's missing. There are a number of transactions that are in PRG's bank documents but are not reported. If they don't know what they are I can provide you with the bank records that we have.
Yes, that would be helpful. I think they just aren't aware of which transactions you're referring do.	Ok I can do that. I will email you that information by Monday.
Great. And I assume we will get another extension to answer since eventually we expect to complete a consent order.	Yes, we can extend that to August 9 <sup>th</sup> .
That works thanks Kelley.	You're welcome and you're hear from me with the bank records by Monday.
Thanks	

PREPARED BY: Kelley Keane-Dawes

**Keane-Dawes, Kelley [ELEC]**

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**From:** Keane-Dawes, Kelley [ELEC]  
**Sent:** Wednesday, July 3, 2024 2:07 PM  
**To:** Bruce Padula  
**Subject:** Elec v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022

Hi Bruce,

This email is to confirm the extension of time to answer the Complaint to August 9, 2024. As per our conversation, I will be sending you a detailed email on Monday with copies of the bank records. Thanks.

Best,

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel  
Election Law Enforcement Commission  
25 South Stockton Street  
P.O. Box 185  
Trenton, NJ 08625  
T: 609 690 4651  
or  
T: 609 292 8700 Ext. 14651

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## Keane-Dawes, Kelley [ELEC]

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**From:** Keane-Dawes, Kelley [ELEC]  
**Sent:** Monday, July 8, 2024 2:32 PM  
**To:** Bruce Padula  
**Subject:** ELEC v. Promoting Responsible Government, C-K 1300 0012 22-Q2022  
**Attachments:** PRG March Bank Statement.pdf; PRG April Bank Statement.pdf; PRG May Bank Statement.pdf; Check \$1k 4.11.22.pdf; Check \$500 3.30.22.pdf; Check \$500 5.4.22.pdf

Hi Bruce,

Attached please find the bank records for the three missing contributions. I have included both the bank statements and canceled checks. Also, please remember the two contributions on the 2022 Q2 from Holman Frenia Allison P.C. totaling \$1,500 that I referenced in earlier emails, are required to be attributed to an individual. That means the address, employer and occupation information for those contributions is required. If you have any questions about this please let me know.

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel  
Election Law Enforcement Commission  
25 South Stockton Street  
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**Keane-Dawes, Kelley [ELEC]**

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**From:** Keane-Dawes, Kelley [ELEC]  
**Sent:** Monday, July 22, 2024 12:19 PM  
**To:** Bruce Padula  
**Subject:** ELEC v. Promoting Responsible Government, C-K 1300 0012 22-Q2022  
**Attachments:** Letter confirming penalty recommendation 7.22.24.pdf

Hi Bruce,

I reviewed the amended filings and everything looks good. I have attached the updated penalty recommendation. Let me know if you have any questions or otherwise would like to discuss the recommendation. Thanks.

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel  
Election Law Enforcement Commission  
25 South Stockton Street  
P.O. Box 185  
Trenton, NJ 08625  
T: 609 690 4651  
or  
T: 609 292 8700 Ext. 14651

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*State of New Jersey*

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Commissioner

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

(609) 292-8700

Website: [www.elec.nj.gov/](http://www.elec.nj.gov/)

AMANDA S. HAINES  
Executive Director

JOSEPH W. DONOHUE  
Deputy Director

STEPHANIE A. OLIVO  
Compliance Director

EDWIN R. MATTHEWS  
Legal Counsel

July 22 2024

VIA E-MAIL ONLY

Bruce W. Padula, Esq.

Cleary, Giacobbe, Alfieri, Jacobs, LLC

[bpadula@cgajlaw.com](mailto:bpadula@cgajlaw.com)

Re: ELEC v. Promoting Responsible Government and Renee Nicastro, C-K 1300 0012 22-Q2022

Dear Mr. Padula:

I have reviewed the amended filings for the above referenced case. The reports have been amended correctly and completely. As such, the recommended penalty for the above captioned matter is broken down below.

- 1) Late reporting of 26 contributions totaling \$28,518.87: \$2,851.88
- 2) Late reporting of 12 expenditures totaling \$17,738.74: \$1,773.87
- 3) Failing to file 48-hour notice for a \$1,400 contribution: \$700
- 4) Failing to file 48-hour notice for a \$2,045 contribution: \$1,022.50
- 5) Failing to file 48-hour notice for a \$4,360 contribution: \$2,180

The recommended penalty above totals **\$8,528.25** against Respondents jointly. Should the penalty be paid in full or partial payment received prior to Final Decision action, the recommended penalty would further be reduced to **\$6,822.60**.

A payment plan is available for the recommended penalty. A payment plan would require an initial payment of 20% of the penalty amount and four equal payments due quarterly. Staff penalty recommendations must be approved by the Commission. Payment may be made by check or money order payable to "Treasurer, State of New Jersey," or electronically at [https://www.elec.nj.gov/elec\\_epayments.html](https://www.elec.nj.gov/elec_epayments.html) under the "Fines" tab. Additional fees may apply when making an electronic payment. Checks or money orders should be submitted to:

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Located at: 25 South Stockton St., 5<sup>th</sup> Floor, Trenton, New Jersey

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

To ensure proper credit, write the case number in the above heading on your check or money order.  
If you have any questions, please call me at (609) 690-4651.

Sincerely,  
*/s/ Kelley Keane-Dawes*

Kelley Keane-Dawes, Esq.  
Assistant Legal Counsel



New Jersey Election Law Enforcement Commission  
**Telephone Conversation Record**  
 Advisory, Consultative Deliberative Material

**Conversation With:** Bruce Padula

**Case ID:** C-K 1300 0012 22-Q2022

**Represented:**

**Telephone:** 201 390 6598

**Municipality:**

**Date:** 8/12/24

Party Called Me: X	I Called Party:	Party Called & I Returned:
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Other Party Said:	I Said:
Ili Kelley, so sorry it's been so long since we last spoke. I got sick but I have talked to my clients about the case. I just wanted to check if the amount can be reduced any more.	Glad you're feeling better. Well, let me look at the penalty recommendation. Ok, it already includes the penalty of only 10% of the transaction and then 50% of the 48 hour violation then another 20% if payment is received in full or part before final decision. So no, it cannot be reduced any more than that.
Ok, and you said partial payment is acceptable.	Yes, as part of a payment plan. So 20% would be due, then as indicated before you want to do a consent order. After the 20% payment is received I would send you the consent order to sign. Then 4 equal payments would be due quarterly. That information is included with the letter recommending penalty. I would present the payment and signed consent order to the commission for final decision. If the commission approves the final decision then it is sent to you and updated on our website.
Ok, I will reach out to my clients to see how they want to do this. I mean full or payment plan.	Ok great. Let me know what they say and I can send you a draft consent order so you will see the wording.
Just to clarify, I know we had an answer due on Friday but we want to go the consent order route.	Yes, I've noted that you will do a consent order so we won't require you to provide a separate answer to the complaint. The consent order will serve as an answer and you won't be penalized for that.
That sounds good. Thanks Kelley	No problem. Thanks.

PREPARED BY: Kelley Keane-Dawes