



STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS
AND ELECTION PRACTICES
135 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0135

Commission Meeting 10/16/2020
Agenda Item #3

To: Commissioners
From: Michael J. Dunn, Esq., Political Committee Registrar
Date: 09/21/2020
Re: Maine Truck PAC – Waiver Request

During the last 13 days before an election, candidates and the political committees regulated by the Commission are required to file expedited campaign finance reports (within 24 hours) of large transactions that would not otherwise be publicly disclosed until after the election. For example, if a political action committee makes a single expenditure of expenditure of \$1,000 or more in that 13-day period, the PAC must file a “24-Hour Report” of that expenditure through the Commission’s e-filing system. On 07/01/2020, the Maine Truck PAC (the “PAC”) made an expenditure of \$2,686.68 for the purchase of golf balls for a fundraiser.¹ The PAC was required to file the 24-hour report by 07/02/2020, but did not do so until 08/12/2020. ETH – 7. On 08/14/2020, the Commission staff notified the PAC that the preliminary penalty was \$2,203.08. ETH – 4-6. The PAC requests a waiver of the preliminary penalty. ETH – 1-3.

LEGAL REQUIREMENTS

PACs are required to report any single contribution of \$5,000 or more received or single expenditure of \$1,000 or more made during the 13 days before an election within 24 hours of that transaction. 21-A M.R.S. § 1059(2)(E). If the PAC is late in filing the 24-hour report, the amount of the penalty is set by a formula which takes into consideration the amount of the transaction, the number of prior violations within a two-year period, and the number of days the report is late. 21-A M.R.S. § 1062-A(3). The Commission may grant a full or partial waiver if it

¹ The primary election occurred on July 14, 2020.

determines that the report was late due to mitigating circumstances defined in statute or is disproportionately high relative to certain factors. 21-A M.R.S. § 1062-A(2).

DISCUSSION AND STAFF RECOMMENDATION

On 07/01/2020, the PAC made an expenditure of \$2,686.68². This expenditure was for the purchase of golf balls that would be used at a fundraiser later in the year. The expenditure was entered into the Commission’s e-filing system on 08/12/2020. Based on the statutory formula for calculating late-filing penalties, the preliminary penalty amount is \$2,203.08, as shown in the below chart:

Report Name	Activity Amount	Due Date	Days Late	Penalty Rate	Penalty
24-Hour Expenditure Report	\$2,686.68	07/02/2020	41	2%	\$2,203.08

The PAC asks that the Commission waive the penalty for being disproportionate to the harm suffered by the public from the late disclosure and that this late report is only the second time³ the PAC had a late filing. ETH – 4-6. The PAC contends that the purpose of the 24-hour reports is to provide disclosure of campaign activity in the period before an election when there are no other reports due. ETH – 1. In this case, the expenditure was for merchandise unrelated to the primary election. The golf balls were used at the September 9, 2020 golf tournament, a fundraiser for the PAC. The PAC also contends that the golf balls should be treated as an overhead cost that is not required to be reported on a 24-hour report.

² The order for the golf balls was placed sometime in April 2020, but the payment occurred on 07/01/2020.

³ The first occurred in 2015.

The Commission staff accepts that the purchase of the golf balls is unrelated to the primary election and is instead in preparation for the September 9, 2020 golf tournament. Even so, the statute requires the filing of a 24-Hour Report if a single expenditure is over \$1,000 in the last two weeks before an election unless the transaction is for overhead expenditures. 21-A M.R.S § 1059(2)(E). Overhead expenses means: “rent, utility payments, taxes, insurance premiums or similar administrative expenses.” Id. The Commission staff recommends that the one-time purchase of golf balls, while preparatory for a fundraiser, is not an administrative expense similar to rent, utility payments, taxes or insurance premiums.

The Commission staff accepts that the public suffered minimal harm by this violation. The purchase of the golf balls was not to influence the primary election. The expenditure just happened to coincide with the 24-hour reporting period. Commission staff also accepts that this violation was an honest mistake by the PAC and that there was no intent to deceive the public.

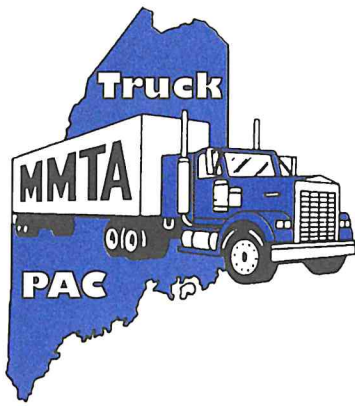
Even so, violations of the 24-hour reporting requirements can be serious matters, as these reports play an important role in informing the electorate about how money is changing hands in the critical days just before an election. Since mid-2018, the staff has been recommending PAC penalties in the range of \$750 or more⁴. The case of Maine Health Care Association PAC is analogous to the current matter. ETH – 12. In that case, the PAC made three \$1,000 contributions to other committees during the 24-Hour reporting period. The Commission accepted that the expenditures were not made for the purpose of influencing the primary election and fell within the 13-Day pre-election period by accident. The Commission reduced the \$2,760 initial penalty to \$500 (below the \$750 minimum).

⁴ This was in response to a statutory change that doubled the initial penalty calculation.

Given the above considerations, the Commission staff recommends a partial waiver and that the penalty be reduced to \$500. The expenditure was not made to influence the primary election.

The PAC had no intent to deceive the public and the violation occurred by mistake.

Thank you for your attention in this matter.



Maine Truck PAC

P.O. Box 857

Augusta, Maine 04332-0857

—
(207) 623-4128

August 14, 2020

Sent via email to Michael.Dunn@maine.gov

Michael J. Dunn, Esq.
Political Committee and Lobbyist Registrar
State of Maine Commission on Governmental
Ethics and Election Practices
135 State House Station
Augusta, ME 04333-0135

RE: Request for Waiver of Late Filing Penalty

Dear Mr. Dunn:

I have received your letter dated August 14, 2020 outlining the enforcement process and fine for the Maine Truck PAC's late 24-Hour Report. Please accept this letter as a written request to waive the penalties for this violation.

I do not dispute the requirement to file the 24-Hour Report, nor do I dispute that I filed it 41 days after it was due – I take full responsibility for this error. In fact, I realized this mistake on my own when I opened the Ethics Commission filing reminder email on August 12th, logged on to the portal to check on the reporting dates of the next filing, and saw a message that I had a late report that needed to be filed. I immediately filed the late report and then notified you by email that I had made the mistake.

For context, there was only one expenditure, and it was to pay for golf balls (with only the Maine Truck PAC logo on them) that we are going to use at our September 9, 2020 golf tournament that is our PAC's main fundraiser for the year. A copy of that invoice is attached.

While this does not adequately satisfy the requirement that I provide a "full explanation of the reasons the PAC filed late" as was indicated in your letter, please accept the following as reasons we request a waiver for the late filing penalties.

The penalty is disproportionate to the harm suffered by the public from the late disclosure.

As indicated on page 11 of the *Ethics Commission Guidebook for Political Action Committees & Ballot Question Committees*, the purpose of 24-hour reports "is to provide disclosure of campaign activity in the period before an election when there are no other reports due." The basic idea is that the public should know who is influencing the election (in this case, the primary) in the days leading up to the vote. However, our expenditure was to pay for golf balls – not candidate or

issue support/opposition for anything remotely related to the July 14th ballot. The expenditure was a product of receiving the invoice for the golf balls in late June and paying the invoice on July 1st.

Also, on the form *2020 ELECTION 24-HOUR REPORT OF CONTRIBUTIONS AND EXPENDITURES For Political Action Committees and Ballot Question Committees*, it says that overhead costs are not required to be reported. I would imagine this is because such expenses are not directly influencing the issues/candidates in the upcoming election. I hope you would agree that buying golf balls is similar to an overhead/operational expense.

We contend that there was no actual harm suffered by the public from the late disclosure of purchasing golf balls for a September PAC event.

The Maine Truck PAC has a stellar track record when it comes to compliance.

The one and only time we have been in front of the Ethics Commission for a violation was in 2015. The issue back then was an instance of missing some contributions due to the way we handled PAC deposits. Since then, we have implemented a new process with additional internal controls that has worked very well as evidenced by the absence of a recurrence of the problem. I would also mention that I have a long history of utilizing Ethics Commission resources whenever I have a question to ensure proper compliance.

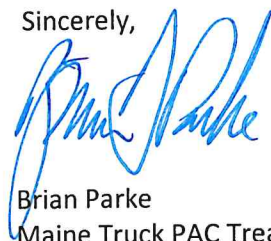
It is also important to mention that with our 2015 violation and this 2020 violation, there was no intent to deceive the Ethics Commission or the public. These are process violations that we admit to being responsible for and do not dispute. But the harshness of the penalties outlined in the August 14th notice of violation does not reflect our consistent efforts to fulfill our responsibilities to comply with the letter and spirit of Maine's compliance requirements.

Conclusion:

Please accept our admission that I should have known to file a 24-hour report on any expenditure over \$1,000 between July 1st and July 13th. We would not have any reason to appeal this fine if the expenditure was to influence any candidate/issue on the July 14th ballot. Unfortunately for us, we paid a vendor invoice for Truck PAC logo golf balls that had zero to do with the July 14th election at a time when the report was required – a process violation for sure, but not one that should carry a \$2,203.08 penalty.

I request the Commission waive the penalty and assure you that we will continue to strive for 100% compliance now and in the future.

Sincerely,



Brian Parke
Maine Truck PAC Treasurer
bparke@mmta.com



Invoice

15 ACME ROAD
BREWER, ME 04412

WSEMERSON.COM
billing@wsemerson.com

P: 207-989-3410
F: 207-989-8540

Invoice No.	656593
Customer No.	955513

Bill To

MAINE MOTOR TRANSPORT ASSOCIATION
P.O. BOX 857
AUGUSTA, ME 04332-4096

Ship To

MAINE MOTOR TRANSPORT ASSOCIATION
142 WHITTEN ROAD
AUGUSTA, ME 04332-4096

Contact: BRIAN PARKE
Telephone: 623-4128
E-mail:

Contact: BILL NORWOOD
Telephone: 623-4128
E-mail: BillN@mmta.com

Invoice Date	Order Date	SO Number	Ordered By	Customer PO Number	Payment Method
06/24/20	04/15/20	1169924	BILL	GOLF BALLS	NET 30
Warehouse	Ship Via	F.O.B.	Salesperson	Resale Number	
MAIN	DROP SHIP		EMILY LEONARD		
Order Quantity	Ship Quantity	Tax	Item Number / Description	Unit Price	Extended Price
144.00	144.00	Y	PINNACLERUSH.111 ASI PRINT PINNACLE RUSH GOLF BALL (DOZENS) 144/DOZEN WHITE	16.50	2,376.00

*pd. 7/6/20
ck #1019*

Print Date	06/24/20
Print Time	11:02:34 AM
Page No.	1

Total Paid	0.00
Balance Due	2,686.68
Due Date	07/24/20

Subtotal	2,376.00
Freight	180.00
5.500 %Sales Tax	130.68
Invoice Total	2,686.68

Printed By: AMANDA PALMETER



August 14, 2020

Brian Parke
Maine Truck PAC
P.O. Box 857
Augusta, ME 04332-0857

Re: Maine Truck PAC Late 24-Hour Report

Dear Mr. Parke:

The Commission staff has made a finding that the Maine Truck PAC (the PAC) was late in filing a 24-Hour campaign finance report. The report was due by 11:59 p.m. on 07/02/2020, but was not filed until 08/12/2020. Under the Commission's statutes, the late filing of a report triggers an enforcement process. (21-A M.R.S.A. § 1062-A). Based on the amount of financial activity in the report, the number of calendar days the report was late, and the PAC's history of violations, the Commission staff has determined that a penalty of \$2,203.08 is owed. (Please see attached penalty matrix for the calculation.)

The PAC may make a written request that the Commission waive the violation or penalty in whole or in part. Any request for a waiver must be made within 14 calendar days of your receipt of this notice. The request must be in writing and contain a full explanation of the reasons the PAC filed late. Upon receiving your request, the Commission staff will schedule your appeal for an upcoming Commission meeting.

The Commission may waive the penalty if it determines that the report was late due to mitigating circumstances, which are defined as (1) a valid emergency; (2) an error made by the Commission staff; or (3) relevant evidence that the PAC made a bona fide effort to file the report on time. Also, the Commission may waive the penalty if it is disproportionate to the level of experience of the person filing the report or the harm suffered by the public from the late disclosure.

Please call me at (207) 287-4709 or send me an email at michael.dunn@maine.gov if you have questions.

Sincerely,

Michael J. Dunn

Michael J. Dunn, Esq.
Political Committee and Lobbyist Registrar

Enclosure

PAYMENT RECEIPT
(Please enclose with payment.)

Mail payment to:

Maine Ethics Commission
135 State House Station
Augusta, ME 04333

Make checks payable to: "Treasurer, State of Maine."

Brian Parke, Treasurer
Maine Truck PAC
P.O. Box 857
Augusta, ME 04332-0857

Violation: Late 24-Hour Report
Amount Due: \$2,203.08

Committee Name: Maine Truck PAC
Prior Violations:

Report Name	Activity Amount	Due Date	Days Late	Penalty Rate	Penalty
24-Hour Expenditure Report	\$2,686.68	07/02/2020	41	2%	\$2,203.08

The penalty for late filing of a required report is a percentage of the total contributions or expenditures for the filing period, whichever is greater, multiplied by the number of calendar days the report is filed late, as follows:

For the first violation, 2%

For the second violation, 4%

For the third and each subsequent violation, 6%

A penalty begins to accrue at 11:59 p.m. on the day the report is due.

A required report that is sent by certified or registered United States mail and postmarked at least 2 days before the deadline is not subject to penalty.

Violations accumulate on reports with filing deadlines in a 2-year period that begins on January 1st of each even-numbered year. Waiver of a penalty does not nullify the finding of a violation.

MAXIMUM PENALTIES

21-A M.R.S.A. Section 1062-A(4)

\$10,000 for Pre- and Post-Election Reports, Quarterly Reports and 24-Hour Reports, except that if the financial activity reported late exceeds \$50,000, the maximum penalty is 100% of the amount reported late.



Commission on Governmental Ethics and Election Practices
Mail: 135 State House Station, Augusta, Maine 04333
Office: 45 Memorial Circle, Augusta, Maine
Website: www.maine.gov/ethics
Phone: 207-287-4179
Fax: 207-287-6775

24-HOUR REPORT OF CONTRIBUTIONS AND EXPENDITURES

2020 CAMPAIGN YEAR

COMMITTEE		TREASURER	
MAINE TRUCK PAC PO Box 857 Augusta, ME 04332 PHONE:(207) 623-4128 EMAIL: BPARKE@MMTA.COM		BRIAN PARKE P.O. Box 857 Augusta, Me 04332-0857 PHONE: EMAIL: BPARKE@MMTA.COM	
REPORT	DUE DATE	REPORTING PERIOD	
24 Hour Report for Expenditures	07/02/2020	07/01/2020-07/01/2020	

FINANCIAL ACTIVITY SUMMARY

CONTRIBUTIONS AND EXPENDITURES	
1. TOTAL CONTRIBUTIONS / LOANS	\$0.00
2. TOTAL EXPENDITURES	\$2,686.68
3. TOTAL DEBTS	\$0.00

I, BRIAN PARKE, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: BRIAN PARKE
REPORT FILED ON: 8/12/2020 10:14:03 AM
LAST MODIFIED:
COMMITTEE ID: 318

24-HOUR EXPENDITURE AND PAYEE INFORMATION

EXPENDITURE TYPES				
<p>CNS Campaign consultants</p> <p>CON Contribution to other candidate, party, committee</p> <p>EQP Equipment (office machines, furniture, cell phones, etc.)</p> <p>FND Fundraising events</p> <p>FOD Food for campaign events, volunteers</p> <p>LIT Print and graphics (flyers, signs, palmcards, t-shirts, etc.)</p> <p>MHS Mail house (all services purchased)</p> <p>OFF Office rent, utilities, phone and internet services, supplies</p> <p>OTH Other</p> <p>PHO Phone banks, automated telephone calls</p>	<p>POL Polling and survey research</p> <p>POS Postage for U.S. Mail and mail box fees</p> <p>PRO Other professional services</p> <p>PRT Print media ads only (newspapers, magazines, etc.)</p> <p>RAD Radio ads, production costs</p> <p>SAL Campaign workers' salaries and personnel costs</p> <p>TRV Travel (fuel, mileage, lodging, etc.)</p> <p>TVN TV or cable ads, production costs</p> <p>WEB Website design, registration, hosting, maintenance, etc.</p>			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
7/1/2020	WS Emerson Co. 15 ACME RD. BREWER, ME, 04412	Golf balls for golf tournament fundraiser	EVT	\$2,686.68
TOTAL EXPENDITURES TO SUPPORT OR OPPOSE:				\$2,686.68

Title 21-A Maine Revised Statutes

§ 1059. Report; filing requirements

A committee required to register under section 1052-A, 1053-B or 1056-B shall file an initial campaign finance report within 7 days of registration and thereafter shall file reports in compliance with this section. All reports must be filed by 11:59 p.m. on the day of the filing deadline, except that reports submitted to a municipal clerk must be filed by the close of business on the day of the filing deadline.

1. Deleted. Laws 2007, c. 443, § A-35.

2. Reporting schedule. A committee shall file reports according to the following schedule.

A. A committee shall file quarterly reports:

- (1) On January 15th, and the report must be complete as of December 31st;
- (2) On April 10th, and the report must be complete as of March 31st;
- (3) On July 15th, and the report must be complete as of June 30th; and
- (4) On October 5th, and the report must be complete as of September 30th.

B. During any year in which primary and general elections are held, a committee shall file primary and general election reports in addition to the reports required under paragraph A:

- (1) On the 11th day before the date on which the election is held, which must be complete as of the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held, which must be complete as of the 35th day after that date.

A committee shall file primary and general election reports even if the committee did not engage in financial activity to influence the primary or general election.

C. In any election year other than a year described in paragraph B, if a committee has received contributions or made expenditures for the purpose of influencing a ballot question election, a special election or a municipal candidate or referendum election subject to Title 30-A, section 2502, the committee shall file preelection and post-election reports:

- (1) On the 11th day before the date on which the election is held, which must be complete as of the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held, which must be complete as of the 35th day after that date.

D. A committee that files an election report under paragraph B or C is not required to file a quarterly report when the deadline for that quarterly report falls within 10 days of the filing deadline established in paragraph B or C.

E. If a committee is required to file a report 11 days before an election pursuant to paragraph B or C, the committee shall report any single contribution of \$5,000 or more received or single expenditure of \$1,000 or more made after the 14th day before the election and more than 24 hours before 5:00 p.m. on the day of the election within 24 hours of that contribution or expenditure. The treasurer is not required to include in this report expenditures for overhead expenses or compensation paid to an employee or other member of the campaign staff who has received payments at regular intervals that have been disclosed in previously filed campaign finance reports. As used in this paragraph, “overhead expenses” includes, but is not limited to, rent, utility payments, taxes, insurance premiums or similar administrative expenses.

....

§ 1062-A. Failure to file on time

....

2. Campaign finance reports. A campaign finance report is not timely filed unless a properly signed or electronically submitted copy of the report, substantially conforming to the disclosure requirements of this subchapter, is received by the commission by 11:59 p.m. on the date it is due. Except as provided in subsection 6, the commission shall determine whether a required report satisfies the requirements for timely filing. The commission may waive a penalty in whole or in part if it is disproportionate to the level of experience of the person filing the report or to the harm suffered by the public from the late disclosure. The commission may waive the penalty in whole or in part if the commission determines the failure to file a timely report was due to mitigating circumstances. For purposes of this section, “mitigating circumstances” means:

- A.** A valid emergency of the committee treasurer determined by the commission, in the interest of the sound administration of justice, to warrant the waiver of the penalty in whole or in part;
- B.** An error by the commission staff; or
- C.** Other circumstances determined by the commission that warrant mitigation of the penalty, based upon relevant evidence presented that a bona fide effort was made to file the report in accordance with the statutory requirements, including, but not limited to, unexplained delays in postal service or interruptions in Internet service.

3. Basis for penalties. The penalty for late filing of a report required under this subchapter is a percentage of the total contributions or expenditures for the filing period, whichever is greater, multiplied by the number of calendar days late, as follows:

- A.** For the first violation, 2%;
- B.** For the 2nd violation, 4%; and
- C.** For the 3rd and subsequent violations, 6%.

Any penalty of less than \$ 10 is waived.

Violations accumulate on reports with filing deadlines in a 2-year period that begins on January 1st of each even-numbered calendar year. Waiver of a penalty does not nullify the finding of a violation.

A report required to be filed under this subchapter that is sent by certified or registered United States mail and postmarked at least 2 days before the deadline is not subject to penalty.

A required report may be provisionally filed by transmission of a facsimile copy of the duly executed report to the commission, as long as an original of the same report is received by the commission within 5 calendar days thereafter.

4. Maximum penalties. The maximum penalty under this subchapter is \$10,000 for reports required under section 1053-A, 1056-B or 1059, except that if the dollar amount of the financial activity that was not timely filed or did not substantially conform to the reporting requirements of this subchapter exceeds \$50,000, the maximum penalty is 100% of the dollar amount of that financial activity.

5. Request for a commission determination. If the commission staff finds that a committee has failed to file a report required under this subchapter, the commission staff shall mail a notice to the treasurer of the committee within 3 business days following the filing deadline informing the treasurer that a report was not received. If a committee files a report required under this subchapter late, a notice of preliminary penalty must be forwarded to the treasurer of the committee whose report is not received by 11:59 p.m. on the deadline date, informing the treasurer of the commission staff finding of violation and preliminary penalty calculated under subsection 3 and providing the treasurer with an opportunity to request a determination by the commission. A request for determination must be made within 14 calendar days of receipt of the commission's notice. A principal officer or treasurer requesting a determination may either appear in person or designate a representative to appear on the principal officer's or treasurer's behalf or submit a sworn statement explaining the mitigating circumstances for consideration by the commission. A final determination by the commission may be appealed to the Superior Court in accordance with Title 5, chapter 375, subchapter 7 and the Maine Rules of Civil Procedure, Rule 80C.

....

24-Hour Reports Waiver Request Cases

Selected cases from 2016-present

2018 Cases

- *New Mainers PAC*. On November 1, 2018, the New Mainers PAC received two contributions, totaling \$12,000. It was required to report these contributions in a 24-Hour Report by November 2, 2018, but did not do so until December 17, 2018. The Commission assessed an initial penalty of \$10,000 for the late filing. The Commission reduced the penalty to \$1,000 due to the PAC's inexperience and the filing of a 24-Hour Report by one of the contributors. Commission penalty: \$1,000
- *Maine Health Care Association PAC*. On May 31, 2018, the Maine Health Care Association PAC made three \$1,000 contributions to other Maine PACs. It was required to report these expenditures in a 24-Hour Report by June 1, 2018 because the PAC's expenditures fell within the 13 days before the June 12, 2018 primary election. The PAC did not disclose the expenditures until July 17, 2018. It requested a waiver of the \$2,760 preliminary penalty. The Commission reduced the penalty by 81% to \$500 (below the new minimum of \$750) because the PAC's three expenditures were not made for the purpose of influencing the June 12, 2018 primary and fell within the 13-day pre-election period by accident, and the three expenditures were at the minimum \$1,000 and were fully reported within the 24-Hour reporting period by the PACs that received the contributions. Commission penalty: \$500
- *Fecteau for Leadership PAC*. On June 4, 2018, the Fecteau for Leadership PAC made a \$5,000 contribution to another PAC. It was required to report this expenditure in a 24-Hour Report by June 5, 2018, but did not do so until June 9, 2018. It requested a waiver of the \$400 preliminary penalty. Commission penalty: \$400

2016 Cases

- *Prosperity for Maine's Future PAC*. On October 28, 2016, the Prosperity for Maine's Future PAC (the PAC) made a \$5,000 expenditure in the form of a contribution to a leadership PAC of an outgoing State Representative. The Prosperity for Maine's Future PAC should have disclosed the expenditure in a 24-Hour Report due the next day, but apparently believed that the PAC receiving the contribution would take care of the

necessary financial reporting. The report was filed on December 17, 2016, when the PAC was preparing its post-election report. The PAC requested a waiver of the \$4,900 preliminary penalty. Commission penalty: \$500

- *Leadership for Maine's Future PAC.* On October 26, 2016, the Leadership for Maine's Future PAC made a \$3,000 expenditure in the form of a contribution to the Maine State Republican Party. The PAC should have disclosed the \$3,000 expenditure in a 24-Hour Report due October 27, 2016. Due to a communication breakdown, the report was not filed until December 20, 2016, when the PAC was preparing its post-election report. The PAC requested a waiver of the \$3,240 preliminary penalty. Commission penalty: \$500
- *Senate Chairman's PAC.* On November 4, 2016, the Senate Chairman's PAC received two contributions that it was required to disclose in 24-Hour Reports. Due to a clerical error, the PAC treasurer reported one contribution, but neglected to file a 24-Hour Report of the other contribution in the amount of \$7,600. The PAC requested a waiver of the \$6,480 preliminary penalty. Commission penalty: \$500.
- *Empowering Maine Leadership PAC.* On November 2, 2016, the Empowering Maine Leadership PAC made four \$1,000 contributions to other PACs and a federal candidate committee. It was required to disclose these expenditures in a 24-Hour Report by November 3, 2016, but did not file the reports until December 19, 2016. The preliminary penalty was \$3,680. Commission penalty: \$500.
- *UBC Bad for ME PAC and the Friends of Maine Sportsmen BQC.* During October 27 - November 3, 2016, the committees engaged in a series of related transactions which should have been reported in a total of six 24-Hour Reports. The PAC and BQC did not file the 24-Hour Reports until December 19, 2016, because the treasurer for the committees was unaware of the requirement. The preliminary penalties total \$7,508.70 for the PAC and \$14,407.05 for the BQC. Commission penalties: \$500 for each organization.