



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

Commission Meeting 05/26/2021
Agenda Item #5

To: Commission
From: Michael J. Dunn, Esq., Political Committee Registrar
Date: May 17, 2021
Re: Working Families PAC and Diane Russell

This memorandum reports back to you concerning an investigation into the Working Families PAC (the "PAC") that was authorized by the Commission at the request of staff on December 18, 2020, and recommends findings of violation and civil penalties. The PAC is led by Diane Russell, a former State Representative and 2018 candidate for the Democratic nomination for Governor. As part of an ongoing compliance review for all political committees, the Commission staff routinely emails the current reported balance of each committee to the treasurer in an attempt to identify and correct errors. On August 27, 2020, the Commission staff emailed the reported balance of \$13,715.71 to Ms. Eiranne Hart, the treasurer of the PAC. On September 3, 2020, Ms. Hart responded indicating that she believed the balance was inaccurate, and that she did not have access to the bank records. She submitted her resignation as the PAC's treasurer on September 3, 2020. ETH. 16.

The Commission staff emailed Ms. Diane Russell, the principal officer of the PAC, regarding the resignation and invited her to identify a replacement treasurer. ETH. 17. The Commission staff did not receive a response. Since then, the PAC has failed to file five campaign finance reports due October 5, 2020, October 23, 2020, December 15, 2020, January 15, 2021, and April 12, 2021. In addition, Ms. Russell has also failed to file a semiannual campaign finance report due January 15, 2021 for her 2018 gubernatorial campaign. The Commission staff has attempted to reach Ms. Russell on multiple occasions. ETH. 1-15; 53-60. The Commission staff sent several emails that were not returned, and eight letters to addresses on file with the Commission for Ms. Russell and her PAC. Letters sent by U.S. Mail (both regular and certified) were returned to the Commission office because she has not updated her address in her PAC and candidate registrations, as required by law. On several occasions, the Commission staff

also attempted to call Ms. Russell but there was no answer and the voicemail box was full. Finally, on May 4, 2021, the Commission staff found a valid address for Ms. Russell through a 2020 absentee ballot application and arranged for her to be personally served with a penalty notice through a Cumberland County deputy sheriff. ETH. 1-6. We had hoped this notice would cause her to take action, but she has not filed overdue reports or responded to the proposed findings of violation and civil penalties.

Despite Ms. Russell's unresponsiveness, the Commission staff was able to subpoena documents from Five County Federal Credit Union, the financial institution that was reported by the PAC to maintain its depository. On February 18, 2021, the Commission received records for the account from January 1, 2018 through October 31, 2018.¹ At all times on the records provided, the PAC maintained a negative balance of between \$5-\$10². The credit union administratively terminated the PAC's account on October 31, 2018 due to a negative balance. Despite this termination, during 2018-2020 the PAC reported receiving contributions of around \$200 per year (apparently received through the ActBlue website)³ and paying a monthly bank fee to the credit union until the PAC ceased filing reports in August 2020. ETH. 18-45; 49-50. Five County FCU has indicated to the Commission staff that there are no other accounts under the name Diane Russell or Working Families PAC.

The Commission staff recommends that the Commission take the following actions:

1. Administratively dissolve the Working Families PAC.
2. Impose a \$3,750 penalty (\$750 each) for not filing five PAC campaign finance reports.
3. Impose a \$500 penalty for multiple failures to amend the PAC registration from 2018 to present.
4. Impose a \$750 penalty for the unfiled 2021 January Semiannual Report for her 2018 gubernatorial campaign.

¹ The Commission's subpoena was for records from January 1 – December 31, 2020.

² These records are confidential from the public.

³ ActBlue files campaign finance reports with the Commission as a PAC and has reported dispersing these contributions to the Working Families PAC.

LEGAL REQUIREMENTS

Investigations by the Commission. The Commission may undertake audits and investigations to determine whether a person has violated Maine’s campaign finance disclosure laws (Title 21-A, Chapter 13). 21-A M.R.S. § 1003.

Registration. A political action committee must appoint a treasurer and a principal officer and disclose them in the committee’s registration. 21-A M.R.S. §§ 1052-A(2) & 1054. The same individual may not serve in both positions. Id. The duties of the treasurer and principal officer are set out in 21-A M.R.S. § 1054-A. A political action committee shall amend the registration within 10 days of a change in the information that the political action committee is required to disclose on its registration. § 1052-A(1)(B). An individual who resigns as a treasurer of a political action committee shall submit a written resignation statement to the Commission that is effective as of the date received by the Commission. § 1052-A(5). The Commission may assess a fine of no more than \$2,500 for failure to provide required information in a registration. 21-A M.R.S. § 1062-A(1).

Reporting requirements. PACs are required to file campaign finance reports according to a schedule set in statute. 21-A M.R.S. § 1059(2). According to this schedule, all PACs were required to file the following reports:

Report Name	Start Period	End Period	Due Date
October Quarterly	08/19/2020	09/30/2020	10/05/2020
11-Day Pre-General	10/01/2020	10/20/2020	10/23/2020
42-Day Post-General	10/21/2020	12/08/2020	12/15/2020
January Quarterly	12/09/2020	12/31/2020	01/15/2020
April Quarterly	01/01/2021	03/31/2021	04/12/2021

Late-filing procedures. If a PAC is late in filing a campaign finance report, the amount of the preliminary penalty is set by a formula which takes the total contributions or expenditures for the report period (whichever is greater), multiplies that by the number of days the report was late, and then takes a percentage (2% for a first violation) of that value as the preliminary penalty. 21-A M.R.S. § 1062-A(3).

Failure to File a PAC Report. The Commission may assess a civil penalty against a PAC for failing to file a campaign finance report required by § 1059. 21-A M.R.S. §§ 1062-A(8) & (8-A). The maximum penalty for failure to file a report is \$10,000 or the amount of the financial activity not reported, whichever is greater. Id.

Failure by a Candidate to file a Post-Election Semiannual Report. A candidate for Governor who has a surplus or deficit in excess of \$100 must file semiannual reports with the Commission by every January 15th and July 15th until the surplus is disposed of or the deficit is liquidated. 21-A M.R.S. § 1017(2)(F). The Commission may assess a penalty of up to \$1,000 against candidate for failing to file a semiannual campaign finance report. 21-A M.R.S. § 1020-A(8-A).

DISCUSSION AND STAFF RECOMMENDATION

I. Administrative Dissolution of the PAC

Based on financial reporting to the Commission by the PAC and ActBlue, it appears that Diane Russell has been receiving around \$200 per year in the name of the Working Families PAC through the ActBlue website. The Commission staff has seen no financial reporting or bank activity suggesting that the PAC used these funds for election-related activity.⁴ Consequently, it appears that in 2018-2020 the Working Families PAC did not meet the statutory PAC definition of receiving or spending more than \$1,500 or \$5,000 in a calendar year for the purpose of influencing a candidate or ballot question election. 21-A M.R.S. § 1052(5). Nevertheless, as a registered PAC, it was required to file campaign finance reports with the Commission.

The Commission has the authority to administer the requirements for campaign reports and to provide for enhanced monitoring and enforcement of election practices. 1 M.R.S. § 1008. The Commission staff recommends that the Commission:

- terminate the PAC in our efilings system without the PAC's consent, and

⁴ ActBlue typically mails checks to its fundraising clients. It is unknown whether Diane Russell has deposited ActBlue checks into any bank account since by Five County Federal Credit Union closed the Working Families PAC account

- suggest to ActBlue that it discontinue the fundraising page for Working Families PAC.

In this memo, we are referring to these actions as administrative dissolution of the PAC.

The recommendations are unusual for the Commission staff. Historically, we have terminated PACs in our efilng system only when the PAC has notified the Commission that it wished to dissolve. To be clear, the Commission staff's recommendation is not to bar Ms. Russell from forming a political action committee in the future. She may, at any time, submit a new registration or even contact staff to reactivate the Working Families PAC.

The Commission staff is recommending dissolution because the Working Families PAC is not operating as a PAC and is causing real harm to the public. The PAC does not have a treasurer as required by 21-A M.R.S. § 1052-A. ETH. 16-17. The PAC has not had a depository as required by 21-A M.R.S. § 1054 since October 2018. The PAC has not filed a campaign finance report since August 2020. The PAC has falsely reported paying a \$5.00 monthly bank fee to Five County Federal Credit Union from October 2018 through August 2020, even though the credit union closed the PAC's account in October 2018. Despite this, the contributions being reported appear real and are confirmed by ActBlue's reports. ETH. 49-50. This means that Ms. Russell is receiving money in the name of the PAC through ActBlue that are presumably deposited in an unknown account and are being used for unknown purposes. The Commission staff has spoken with ActBlue and they have indicated that if the Commission dissolves the PAC, they will stop processing those payments. ETH. 51-52. The dissolution of the PAC will protect the Maine residents whose bank accounts are still being charged through ActBlue. This dissolution will also protect Ms. Russell from further penalties due to unfiled reports.

For these reasons, the Commission staff recommends that the Commission administratively dissolve the Working Families PAC. Ms. Russell may choose to register a new PAC or re-register the Working Families PAC in the future.

II. Failure to File PAC Campaign Finance Reports

The PAC was required to file the following reports by their respective due dates:

Report Name	Start Period	End Period	Due Date
October Quarterly	08/19/2020	09/30/2020	10/05/2020
11-Day Pre-General	10/01/2020	10/20/2020	10/23/2020
42-Day Post-General	10/21/2020	12/08/2020	12/15/2020
January Quarterly	12/09/2020	12/31/2020	01/15/2021
April Quarterly	01/01/2021	03/31/2021	04/12/2021

To date, the PAC has not filed any of these required reports. Under normal circumstances, the PAC would owe a penalty based on the amount of financial activity, number of days late, and a statutory percentage. 21-A M.R.S. § 1062-A(3). Here, however, this calculation does not work because the reports are not filed. If a person fails to file a report within 30 days of its due date, the Commission may assess a civil penalty up to \$10,000 or the amount of the financial activity, whichever is greater. 21-A M.R.S. § 1062-A(8-A). In this case, it is reasonable to assume based on the filed reports that the PAC's financial activity does not exceed \$10,000. ETH. 18-45.

The Commission staff is recommending a \$750 penalty per report. The Commission's practice has been to impose a \$750 penalty for late filed reports. In this matter, there is certainly an argument that the penalty should be higher due to the length of time and unresponsiveness of Ms. Russell. Nevertheless, we recommend \$750 per report because the unreported financial activity in 2019-2020 is likely less than \$200 and the total recommended penalty of \$5,000 is significant for a former State Representative whose PAC has been inactive.

III. Failure to Update PAC Registration

A PAC's registration must provide the contact information for its officers and the name and contact information for the financial institution that is maintaining the depository. 21-A M.R.S. § 1052-A(2). A PAC must amend its registration within 10 days of a change to any information that it is required to report. 21-A M.R.S. § 1052-A(1)(B).

Failure to provide the information required by the registration may result in a fine of no more than \$2,500. 21-A M.R.S. § 1062-A(1).

In this case, the PAC failed to amend its registration on multiple occasions. In October 2018, the PAC was required to open a new account and provide the financial institution's information to the Commission. Here, the only reason that the Commission staff was able to obtain bank records was because the former treasurer volunteered the information to the Commission staff. Next, on April 13, 2020, the PAC amended its mailing address to 4 Oak Street in Saco, which was the treasurer's residence. The treasurer's contact information was left as her old address and Ms. Russell left her address as the principal officer blank. Consequently, the PAC has not reported an address for its principal officer, Ms. Russell, since April 2020. Lastly, in September 2020, Ms. Russell failed to select a new treasurer when the Commission staff informed her that Ms. Hart had resigned.

Accordingly, the Commission staff recommends finding that the Working Families PAC violated 21-A M.R.S. § 1054 by not appointing a new treasurer and § 1052-A(1)(B) by failing to amend the registration. Commission staff is recommending a combined penalty of \$500 for the failure to amend the registration.

IV. Ongoing Investigation

The Commission staff recommends that the Commission close the investigation into the Working Families PAC after finding the appropriate penalties. The origin of this investigation stemmed from the routine compliance review conducted by the Commission staff which includes an account balance check. The Working Families PAC's reported balance is over \$13,000; Ms. Hart, the former treasurer, indicated to the Commission staff that the balance could not possibly be correct. This was confirmed by a review of the PAC's bank statements from 2018.

The PAC is reporting a balance of \$13,365 but the account was closed in October 2018 for having a negative balance. The PAC, since 2013, has raised approximately \$56,000; meaning that 23% of the funds raised by the PAC are unaccounted for by its reports. Despite this, the Commission staff is recommending that the Commission close the

investigation because any violations are stale, it would require a significant time commitment from the Commission staff, and it is possible that certain records have been destroyed. To reconcile the accounts, the Commission staff would be required to subpoena the financial institution for all records from 01/01/2013 through 12/31/2017 and then compare those records against the campaign finance reports. It is possible that additional violations may be uncovered by this kind of review, but it is of little value to the public at this time.

V. Unfiled Candidate Campaign Finance Report

After an election, a candidate that has a surplus or deficit in excess of \$100 must file semiannual reports with the Commission. 21-A M.R.S. § 1017(2)(F). The reports filed by Ms. Russell in 2018 to 2020 stated that she owed nineteen campaign debts totaling \$77,431.69 to vendors that had provided campaign services to her 2018 gubernatorial campaign.

Pursuant to Chapter 1, Section 6(6) of the Commission rules, the Commission staff contacted some of the vendors. The vendors confirmed that they provided services to her with the expectation of being paid but had not received payment. Pursuant to the Commission's rule, the Commission staff sent Ms. Russell correspondence requesting plans to repay the vendors, but she did not provide any plan other than a general statement of intention to raise funds for this purpose. Since 2018, she has not reported raising any funds to pay off these debts.

On January 15, 2021, Ms. Russell was required to file a semiannual report for her 2018 gubernatorial account. Ms. Russell received reminder emails from the Commission's e-filing system and from the candidate registrar. To date, Ms. Russell has not filed the January Semiannual Report.

The Commission is authorized to assess a civil penalty against a candidate that fails to file a campaign finance report, which may not exceed the maximum late-filing penalty for that report. 21-A M.R.S. § 1020-A(8-A). The maximum penalty for an unfiled semi-annual report is \$1,000. 21-A M.R.S. § 1020-A(5-A)(C). The Commission staff is recommending that the Commission assess a penalty of \$750 for not filing the January

15, 2021 semiannual campaign finance report. The Commission routinely reduces penalties to the \$300-\$400 range for candidates; however, this range is for late filed reports. Here, Ms. Russell has failed to file her January Semiannual Report. Ms. Russell is an experienced candidate who should have known about the report and should have contacted the Commission staff when she was late.

CONCLUSION

As the Commission is aware, the staff tries to resolve non-compliance situations without the assessment of large penalties. We tried multiple times to reach out to Diane Russell to persuade her to appoint a new PAC treasurer, resume financial reporting, and file an accurate and complete PAC registration. Ms. Russell is an experienced elected official. We cannot account for why she has ignored outreach from the Commission staff. We believe penalties are appropriate in this matter to underscore that PACs and candidates for Governor may not voluntarily ignore finance reporting and other legal obligations. The Commission staff recommends that the Commission close the investigation into the Working Families PAC, administratively dissolve the PAC, and find that the Working Families PAC and Diane Russell:

- violated 21-A M.R.S. § 1059(2) by not filing five campaign finance reports on behalf of the Working Families PAC due October 5, 2020, October 23, 2020, December 15, 2020, January 15, 2021, and April 12, 2021,
- violated 21-A M.R.S. § 1054 by not appointing a treasurer for the PAC after Eiranne Hart resigned on September 3, 2020,
- violated 21-A M.R.S. § 1052-A(1)(B) by not amending the PAC registration to disclose an account name and the name and address of the financial institution at which PAC funds are maintained (incomplete since Sept. 2018), an address for you as the PAC principal officer (incomplete since April 2020), and the name and address of a treasurer (incomplete since Sept. 2020), and
- violated 21-A M.R.S. § 1017(2)(F) by not filing a semiannual campaign finance report in connection with your 2018 gubernatorial campaign due January 15, 2021.

The staff also recommends assessing the following penalties totaling \$5,000 against Working Families PAC and Diane Russell (she would be responsible for the penalties against the PAC as its principal officer):

- five penalties of \$750 (\$3,750 in total) pursuant to 21-A M.R.S. § 1062-A(8-A) for not filing five campaign finance reports due at deadlines set out in 21-A M.R.S. § 1059(2),
- a penalty of \$500 pursuant 21-A M.R.S. § 1062-A(1) for failing to provide updated information required in the PAC registration (name and address of financial institution, account name, address for principal officer, name and address for treasurer), and
- a penalty of \$750 pursuant to 21-A M.R.S. § 1020-A(8-A) for not filing a campaign finance report in connection with your 2018 campaign for Governor due on January 15, 2021 under 21-A M.R.S. § 1017(2)(F).

Thank you for your attention in this matter.



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

May 4, 2021

Service by Cumberland County Sheriff's Office

Hon. Diane Russell
Working Families PAC
72 Auburn Street
Portland, ME 04103

**NOTICE OF PROPOSED PENALTIES
AND OPPORTUNITY TO RESPOND**

Dear Ms. Russell:

On December 18, 2020, the Maine Commission on Governmental Ethics and Election Practices directed its staff to investigate the Working Families political action committee ("PAC"), because it had not filed campaign finance reports since August 2020. The Commission staff has attempted to reach you concerning this issue by phone, email, and regular mail, but you have not responded to the correspondence. In addition, you have not responded to correspondence concerning the late filing of your semiannual campaign finance report due January 15, 2021 in connection with your 2018 campaign for Governor.

This letter is to notify you of enforcement actions that are proposed by the Commission staff for the Commission's May 26, 2021 meeting and to provide you with an opportunity to respond.

Relevant Law

Requirement for PACs to file campaign finance reports. PACs are required to file campaign finance reports according to a schedule set forth in 21-A M.R.S. § 1059(2).

Duty to appoint a treasurer and principal officer. Each PAC must appoint a treasurer. 21-A M.R.S. § 1054. The treasurer must ensure that the PAC files complete and accurate campaign finance reports and maintains records required by law. 21-A M.R.S. § 1054-A(1).

The PAC must also appoint a principal officer. The treasurer and the principal officer are jointly responsible for the PAC's compliance with campaign finance law. 21-A M.R.S. § 1054-A(2). They are also responsible for accepting and responding to notices and correspondence from the Commission on behalf of the PAC. The treasurer and principal officer may not be the same person. 21-A M.R.S. § 1052-A(2).

Requirement for PACs to register and to amend PAC registrations. Among other information, PACs are required to disclose the names and addresses of the PAC's treasurer and principal officer in a registration statement filed with the Commission. 21-A M.R.S. § 1052-A(2). The addresses are necessary for the Commission to be able to mail notices and other correspondence to the treasurer and principal officer. The PAC registration is also required to include the name of the account from which the PAC will make expenditures to influence elections and the name and address of the financial institution at which the account was established. 21-A M.R.S. § 1052-A(3)(E). When there is a change in the registration information, the PAC must amend the registration within 10 days of a change. 21-A M.R.S. § 1052-A(1)(B).

Duty to file semiannual campaign finance reports. A candidate for Governor who has a surplus or deficit in excess of \$100 must file semiannual reports with the Commission by every January 15th and July 15th until the surplus is disposed of or the deficit is liquidated. 21-A M.R.S. § 1017(2)(F).

Civil penalties. The Commission may assess a civil penalty for failing to file a campaign finance report. 21-A M.R.S. § 1062-A(8-A). The maximum penalty is \$10,000 or the amount of financial activity not reported. The Commission may assess a penalty of no more than \$2,500 for failing to include required information a PAC registration form. 21-A M.R.S. § 1062-A(1). The Commission may hold the treasurer and principal officer of a PAC jointly and severally liable with the PAC for any penalties assessed against the PAC. 21-A M.R.S. § 1054-A(4).

The Commission may assess a penalty of up to \$1,000 against candidate for failing to file a semiannual campaign finance report. 21-A M.R.S. § 1020-A(8-A).

Enforcement Actions Proposed by Commission Staff

Factual background

PAC reporting. The Working Families PAC first registered with the Commission on May 22, 2013. The PAC filed campaign finance reports for over seven years. You have been the principal officer of the PAC since that time. Three individuals served as treasurer during that period, most recently Eiranne Hart who was treasurer for approximately five years until September 2020.

In 2018 through 2020, the PAC filed campaign finance reports showing the following total amounts:

	Contributions	Expenditures
2018	\$192.16	\$65.60
2019	\$216.00	\$62.22
2020	\$126.00	\$30.00

Ms. Diane Russell

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May 4, 2021

The totals for 2020 are incomplete, because the Working Families PAC filed only three campaign finance reports of 2020 activities. The last campaign finance report filed by the PAC was dated August 25, 2020. The PAC has not filed five campaign finance reports due October 5, 2020, October 23, 2020, December 15, 2020, January 15, 2021, and April 12, 2021.

On September 3, 2020, Ms. Hart notified the Commission staff by email that she was resigning as treasurer. Later that day, the Commission staff forwarded Ms. Hart's email to you. We requested that you identify someone who would be taking over as treasurer, but you did not respond. Prior to her resignation, Ms. Hart contacted the Commission staff to ask how to resign. She told us that she had filed campaign finance reports in 2019 based on information you provided her. She said that around December 24, 2019, she told you that she would no longer file campaign finance reports for the PAC. We conclude that in 2020 you filed campaign finance reports with Ms. Hart's user name and password, rather than the user name assigned to you as the principal officer of the PAC.

Information missing from the PAC registration. The Commission staff's investigation of the Working Families PAC indicated that the account for the PAC at the Five County Credit Union closed in October 2018. Following the closure of the account, you did not amend the registration to indicate the name of a different account and institution through which the PAC's financial activity was being conducted.

Through April 13, 2020, the PAC's registration included an address for the PAC of 128 North Street in Portland, which the Commission understood to be your residence. On April 13, 2020, the PAC amended its registration to include an address for the PAC of 4 Oak Street in Saco. Through the fall of 2020, the Commission assumed that this was a valid mailing address at which you could receive mail. The Commission staff has determined that 4 Oak Street in Saco is not a valid address for you, and the PAC registration has not included an address for you as principal officer since April 13, 2020.

Reporting as a 2018 candidate for Governor. You were a candidate for the Democratic party nomination for Governor in the June 13, 2018 primary election. The reports you filed in 2018 to 2020 stated that you owed nineteen campaign debts totaling \$77,431.69. The Commission staff contacted some of the vendors and confirmed that the debts were accurately reported.

Because you owed campaign debts exceeding \$100, you were required to file semiannual campaign finance reports every six months until you liquidated the debts. You filed four semiannual campaign finance reports from January 15, 2019 until July 15, 2020, but did not file a semiannual campaign finance report due January 15, 2021.

Proposed Findings of Violation

The Commission has scheduled this matter to be considered at a meeting on May 26, 2021. The staff intends to recommend that the Commission find that you and the Working Families PAC:

- violated 21-A M.R.S. § 1059(2) by not filing five campaign finance reports on behalf of the Working Families PAC due October 5, 2020, October 23, 2020, December 15, 2020, January 15, 2021, and April 12, 2021,
- violated 21-A M.R.S. § 1054 by not appointing a treasurer for the PAC after Eiranne Hart resigned on September 3, 2020,
- violated 21-A M.R.S. § 1052-A(1)(B) by not amending the PAC registration to disclose an account name and the name and address of the financial institution at which PAC funds are maintained (incomplete since Sept. 2018), an address for you as the PAC principal officer (incomplete since April 2020), and the name and address of a treasurer (incomplete since Sept. 2020), and
- violated 21-A M.R.S. § 1017(2)(F) by not filing a semiannual campaign finance report in connection with your 2018 gubernatorial campaign due January 15, 2021.

Proposed Civil Penalties

The Commission staff also intends to recommend that the Commission assess the following penalties against you and Working Families PAC:

- five penalties of \$750 (\$3,750 in total) pursuant to 21-A M.R.S. § 1062-A(8-A) for not filing five campaign finance reports due at deadlines set out in 21-A M.R.S. § 1059(2),
- a penalty of \$500 pursuant 21-A M.R.S. § 1062-A(1) for failing to provide updated information required in the PAC registration (name and address of financial institution, account name, address for principal officer, name and address for treasurer), and
- a penalty of \$750 pursuant to 21-A M.R.S. § 1020-A(8-A) for not filing a campaign finance report in connection with your 2018 campaign for Governor due on January 15, 2021 under 21-A M.R.S. § 1017(2)(F).

The proposed civil penalties total \$5,000.

Your Opportunity to Respond

The Commission staff has tentatively scheduled this matter for consideration by the Commission at its meeting on Wednesday, May 26, 2021 at 9:00 a.m. The meeting will be conducted by Zoom videoconference.

To reduce the severity of the outcome in this matter, the Commission staff urges you to file all overdue reports and to cooperate with the Commission's investigation of Working Families PAC.

We also recommend that you respond to the proposed findings of violation and civil penalties in writing and by participating in the May 26, 2021 meeting by Zoom videoconference. In the written response, you are welcome to include any mitigating

Ms. Diane Russell

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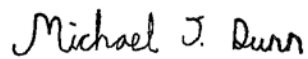
May 4, 2021

information you would like concerning the failure to file campaign finance reports, appoint a replacement treasurer, and amend the Working Families PAC registration. The Commission staff will send you a link to the videoconference by email.

Please contact me if you have any questions regarding this letter. I can be reached at Michael.Dunn@maine.gov or (207) 287-4709.

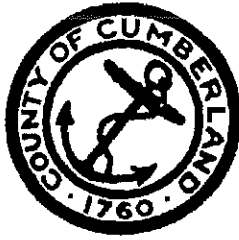
I look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script that reads "Michael J. Dunn".

Michael J. Dunn, Esq.

Political Committee and Lobbyist Registrar



CUMBERLAND COUNTY SHERIFF'S OFFICE
CIVIL DIVISION

RETURN OF SERVICE

STATE OF MAINE
CUMBERLAND COUNTY, ss.

DATE OF SERVICE 5-6 - 2011

I have this day made service of the Notice

by serving the within named Diane Russell

by delivery a copy to her in hand

a person of suitable age and discretion then residing at persons usual place of abode.

by delivering a copy to _____

An agent authorized by appointment or by law to receive service of process.

The said process was served this day at 72 Auburn St. Portland ME

Samuel J. Renaud
Deputy Sheriff CCSO

Service:		\$	<u>16.00</u>
Travel, _____ miles		\$	<u>8.40</u>
Postage		\$	<u>71</u>
Administrative Fee		\$	<u>500</u>
	Amount	\$	<u>30.11</u>



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

May 18, 2021

Hon. Diane Russell
32 Grant St.
Portland, ME 04101

Re: Working Families PAC Late Filings

Dear Ms. Russell:

Our records show that the Working Families PAC (the PAC) has not filed its October Quarterly, 11-Day Pre-General, 42-Day Post-General, January Quarterly, or April Quarterly Reports.

Please contact me as soon as possible regarding these unfiled reports.

State law (21-A M.R.S.A. § 1062-A) requires that a penalty be assessed for late reports based on the amount of financial activity conducted during the filing period, the number of calendar days a report is filed late, and the PAC's filing record. If the PAC raised or spent money during the filing period, it could be subject to civil penalties that are accruing on a daily basis. Once the PAC has filed its report, our office will calculate the penalty and will notify you of the amount of the penalty.

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



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

January 19, 2021

Hon. Diane Russell
32 Grant St.
Portland, ME 04101

Re: Working Families PAC Late Filing of the October Quarterly, 11-Day Pre-General, and
42-Day Post-General Reports

Dear Ms. Russell:

Our records show that the Working Families PAC (the PAC) has not filed its October Quarterly, 11-Day Pre-General, 42-Day Post-General, or January Quarterly Reports. **Please contact me as soon as possible regarding these unfiled reports.**

State law (21-A M.R.S.A. § 1062-A) requires that a penalty be assessed for late reports based on the amount of financial activity conducted during the filing period, the number of calendar days a report is filed late, and the PAC's filing record. If the PAC raised or spent money during the filing period, it could be subject to civil penalties that are accruing on a daily basis. Once the PAC has filed its report, our office will calculate the penalty and will notify you of the amount of the penalty.

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



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

December 18, 2020

Hon. Diane Russell
32 Grant St.
Portland, ME 04101

Re: Working Families PAC Late Filing of the October Quarterly, 11-Day Pre-General, and
42-Day Post-General Reports

Dear Ms. Russell:

Our records show that the Working Families PAC (the PAC) has not filed its October Quarterly, 11-Day Pre-General, or 42-Day Post-General Reports campaign finance reports. **Please contact me as soon as possible regarding these unfiled reports.**

State law (21-A M.R.S.A. § 1062-A) requires that a penalty be assessed for late reports based on the amount of financial activity conducted during the filing period, the number of calendar days a report is filed late, and the PAC's filing record. If the PAC raised or spent money during the filing period, it could be subject to civil penalties that are accruing on a daily basis. Once the PAC has filed its report, our office will calculate the penalty and will notify you of the amount of the penalty.

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



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

November 24, 2020

Sent via Certified and Regular USPS and Email

Hon. Diane Russell
Working Families PAC
32 Grant St.
Portland, ME 04101

Re: Request to Investigate Working Families PAC

Dear Ms. Russell:

On December 18, 2020, the Maine Ethics Commission will be considering a request by the Commission staff to initiate an investigation into the Working Families PAC (the "PAC"). The staff requests that you respond in writing no later than **December 8, 2020**. The Commission staff strongly encourages you to participate in the discussion of this matter at the December 18, 2020 meeting although your participation is not required.

REQUIREMENT TO UPDATE REGISTRATION

Pursuant to 21-A M.R.S. § 1052-A(2), a political action committee must have a treasurer and principal officer, who cannot be the same person. A committee shall amend the registration within 10 days of a change in the information that committees are required to disclose. 21-A M.R.S. § 1052-A(1)(B). Failure to provide accurate information in a registration can result in a fine of no more than \$2,500. 21-A M.R.S. § 1062-A(1). In assessing a fine the Commission shall consider whether the violation was intentional, the amount of campaign and financial activity that occurred before the registration, whether committee intended to conceal its campaign activity, and the level of experience of the committee's volunteers and staff. Id.

On September 3, 2020, Ms. Eiranne Hart submitted a signed resignation as treasurer for the PAC to my office. On the same day, I forwarded that communication to you at dianerussell207@gmail.com. I did not receive a reply. Recently, I realized that the committee's sole listed address is Ms. Hart's and that previous mailings had not reached you as a result.

The Commission staff requests that you update the PAC's registration to reflect the PAC's and your current contact information, and that you select a new treasurer and update the PAC's registration with the new treasurer's contact information. The new treasurer will also be required to submit the acknowledgment of responsibilities form that can be found at maine.gov/ethics.

UNFILED CAMPAIGN FINANCE REPORTS

All political action committees were required to file the October Quarterly Report by October 5, 2020, and the 11-Day Pre-General Report by October 23, 2020. 21-A M.R.S. § 1059(2). If no report has been filed then the Commission may assess a civil penalty up to \$10,000, or the amount of financial activity not reported, whichever is greater. 21-A M.R.S. § 1062-A(8-A). If the report is filed late, then the penalty is calculated based on a percentage of the amount of the financial activity reported late multiplied by the number of days that the report was filed late. Because the PAC has already filed two reports late in 2020, the percentage for the two reports mentioned above is 6%. 21-A M.R.S. § 1062-A(3). The Commission may waive the penalty for a late-filed report if the penalty is disproportionate to the level of experience of the person filing the report, or the harm suffered by the public from the late disclosure, or if the failure to file the report timely was due to mitigating circumstances. 21-A M.R.S. § 1062-A(2). A mitigating circumstance means a valid emergency, an error by Commission staff, or other circumstances that warrant mitigation of the penalty. Id.

On October 6, 2020, the Commission staff sent you an email notifying you that the October Quarterly Report had not been filed and followed-up with a letter on October 15, 2020¹. On October 28, 2020, the Commission staff sent you an email notifying you that the 11-Day Pre-General Report had not been filed and sent another letter². On November 18, 2020, Jonathan Wayne, the Commission's Executive Director, sent you an email regarding the unfiled reports. To date, the Commission staff still has not received a response from you regarding these unfiled reports.

The Commission staff requests that you enter the appropriate transactions and file the PAC's October Quarterly Report and 11-Day Pre-General Report as soon as possible.

REQUEST FOR INVESTIGATION

Pursuant to 21-A M.R.S. § 1003(1), the Commission may undertake an investigation on its own initiative to determine whether a person has violated Maine's campaign finance laws. Political action committees must file complete and accurate reports of all contributions received and expenditures made by the committee. 21-A M.R.S. § 1054-A(1) & (2).

On August 27, 2020, the Commission staff, as part of an ongoing routine compliance review of all political action committees' reports, emailed all committee treasurers their committee's current cash balance as reported in their 42-Day Post-Primary Report, with instructions to contact the Commission staff if the balance did not match the balance in the committee's bank account. On September 3, 2020, Ms. Hart contacted the Commission staff and indicated that she did not believe the PAC's reported balance of \$13,715.71 was accurate. In the same phone call, she stated her intent to resign from the PAC and requested the staff's assistance to do so.

¹ As indicated above, this was sent to the address on record which was no longer accurate.

² Also sent to the incorrect address.

On November 18, 2020, the Commission staff spoke with Ms. Hart regarding her resignation. Ms. Hart indicated that she was not provided access to the PAC's bank account, but her records indicated that she had requested the bank statements from you to resolve a discrepancy on September 18, 2018. She indicated that she was never provided with those bank records. Ms. Hart said she informed you on December 24, 2019 that she was no longer comfortable filing the reports for the PAC. She also was unaware that you had continued to file those reports using her login credentials to access the Commission's campaign finance reporting system.

At the December 18, 2020 meeting, the Commission staff will request that the Commission initiate an investigation into whether the PAC is in compliance with its reporting obligations as required by law. The Commission staff will request the Commission's authorization to obtain the PAC's bank statements for May 2020 through October 2020 to be reviewed by the staff to determine the accuracy of the PAC's reports. Additional records may be requested and reviewed based on the staff's preliminary findings.

PREPARATION FOR DECEMBER 18, 2020 MEETING

The Commission staff would like to provide you the opportunity to respond in writing to the issues raised in this letter and to present to the Commission any arguments why the Commission should not initiate an investigation. You may submit a written response no later than **December 8, 2020**. You will also have the opportunity to participate at the December 18, 2020 meeting, which will be conducted via Zoom. The Commission staff also recommends that you take the following actions before the December 18, 2020 meeting:

1. Select a new treasurer, amend the PAC's registration to ensure that the information is accurate, and submit the new treasurer's acknowledgment of responsibilities form. Specifically, you must provide your current mailing address, phone number, and email address.
2. Enter all transactions for the October Quarterly Report and 11-Day Pre-General Report and file both reports.
3. Make any amendments to previously filed reports, if necessary, to ensure completeness and accuracy.

If you have any questions or concerns regarding these requests, you may contact me at Michael.Dunn@maine.gov or (207) 287-4709. Thank you for your attention in this matter.

Sincerely,



Michael J Dunn, Esq.
Political Committee Registrar



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

October 28, 2020

Diane Russell
4 Oak St.
Saco, ME 04072

Re: Working Families PAC Late Filing of the October Quarterly and 11-Day Pre-General Report

Dear Ms. Russell:

Our records show that the Working Families PAC (the PAC) has not filed its October Quarterly or 11-Day Pre-General campaign finance reports. The October Quarterly was due on 10/05/2020 and the 11-Day Pre-General was due on 10/23/2020. **Please file these reports as soon as possible.**

State law (21-A M.R.S.A. § 1062-A) requires that a penalty be assessed for late reports based on the amount of financial activity conducted during the filing period, the number of calendar days a report is filed late, and the PAC's filing record. If the PAC raised or spent money during the filing period, it could be subject to civil penalties that are accruing on a daily basis. Once the PAC has filed its report, our office will calculate the penalty and will notify you of the amount of the penalty.

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



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

October 15, 2020

Diane Russell
4 Oak St.
Saco, ME 04072

Re: Working Families PAC Late Filing of 2020 October Quarterly Report

Dear Ms. Russell:

Our records show that the Working Families PAC (the PAC) has not filed its 2020 October Quarterly campaign finance report. The report was due by 11:59 p.m. on 10/05/2020. **Please file this report as soon as possible.**

State law (21-A M.R.S.A. § 1062-A) requires that a penalty be assessed for late reports based on the amount of financial activity conducted during the filing period, the number of calendar days a report is filed late, and the PAC's filing record. If the PAC raised or spent money during the filing period, it could be subject to civil penalties that are accruing on a daily basis. Once the PAC has filed its report, our office will calculate the penalty and will notify you of the amount of the penalty.

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



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

January 21, 2021

Diane Russell
32 Grant Street
Portland, Maine 04103

Re: Delinquent Campaign Finance Report – Due January 15, 2021

Dear Ms. Russell,

Our records show that you have not filed your 2021 January Semiannual Report. You are required to file this report due to remaining cash and debts from your 2018 campaign. State law [21-A M.R.S.A. § 1020-A] requires that a penalty be assessed for late reports based on the amount of financial activity conducted during the filing period, on the number of calendar days a report is filed late, and on the candidate's filing record. If you raised or spent money during the filing period, you could be subject to civil penalties, which are accruing on a daily basis. Once you have filed your report, our office will calculate the penalty and will notify you of the amount of the penalty.

Therefore, we urge you to file your report as soon as possible.

Sincerely,

Emma Burke

Emma Burke
Candidate Registrar

From: [Eiranne Hart](#)
To: [Dunn, Michael](#)
Subject: Working Families PAC
Date: Thursday, September 3, 2020 12:48:11 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Michael,

I would like to resign as treasurer of the above referenced PAC effective today, 9/3/2020.
Please let me know if you require anything else from me.

Warm Regards,

Eiranne Hart

From: [Dunn, Michael](#)
To: ["DIANERUSSELL207@GMAIL.COM"](mailto:DIANERUSSELL207@GMAIL.COM)
Subject: WORKING FAMILIES PAC
Date: Thursday, September 3, 2020 3:38:56 PM

Hello Ms. Russell:

I received notice from Ms. Hart that she has resigned as treasurer of the above captioned committee. Please let me know who will be taking over for her as treasurer at your earliest opportunity. I was also inquiring into the account balance for this committee, it is reported as \$13,751.71. Is that the same balance as the checking account?

Please let me know at your earliest opportunity.

Sincerely,

Michael J. Dunn, Esq.
Political Committee and Lobbyist Registrar
Maine Ethics Commission
135 State House Station
Augusta, Maine 04333
Phone: (207) 287-4179 Fax: (207) 287-6775

Confidentiality Notice | This e-mail message, including any attachments, has been sent from the Commission on Governmental Ethics and is for the sole use of the intended recipient(s). If you are not the intended recipient, you are asked not to distribute this message. If you are not the intended recipient, please delete it and contact the sender by reply e-mail. Thank you.



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

2019 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
WORKING FAMILIES PAC 128R NORTH ST PORTLAND, ME, 04101 PHONE:(207) 272-9182 EMAIL: DIANERUSSELL207@GMAIL.COM		Mrs. EIRANNE CHRISTY 468 WEBBS MILL RD RAYMOND, ME, 04071 PHONE:(207) 478-1268 EMAIL: EIRANNE.HART@YAHOO.COM	
REPORT	DUE DATE	REPORTING PERIOD	
JANUARY QUARTERLY REPORT	01/15/2019	12/12/2018 - 12/31/2018	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$18.00	\$192.19
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$18.00	\$192.19
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$5.00	\$65.60
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$5.00	\$65.60
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$13,452.93	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$18.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$5.00	
12. CASH BALANCE AT END OF PERIOD	\$13,465.93	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$5,500.00	

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

REPORT FILED BY: EIRANNE CHRISTY
 REPORT FILED ON: 1/14/2019 8:29:53 AM
 LAST MODIFIED:
 COMMITTEE ID: 4245

**SCHEDULE A
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- | | |
|--|--|
| 1 = Individual | 9 = Candidate / Candidate Committee |
| 2 = Candidate/ Spouse/ Domestic Partner | 10 = General Treasury Transfer |
| 3 = Commercial Source | 11 = Transfer from Previous Campaign |
| 4 = Nonprofit Organization | 12 = Contributors giving \$50 or less |
| 5 = Political Action Committee | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee | 15 = MCEA Payment |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
12/31/2018	Contributors giving \$50 or less		12	\$18.00
TOTAL CASH CONTRIBUTIONS				\$18.00

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
12/31/2018	Five County Credit Union PO BOX 598 BATH, ME, 04530	Monthly bank fee	OTH	\$5.00
TOTAL OPERATING EXPENDITURES				\$5.00

**SCHEDULE D
UNPAID DEBTS AND OBLIGATIONS**

- A debt or obligation is incurred if a committee places an order for a good or service without making a payment; makes a promise or agreement to pay for a good or service; signs a contract for a good or service; or receives delivery of a good or service for which the committee has not paid.
- This schedule is a list of all debts and obligations of the committee as of the end of this reporting period.

DATE OF OBLIGATION	CREDITOR	DESCRIPTION	AMOUNT
7/15/2013	PowerThru LLC 1740 Hinesburg Road Richmond, ME, 05477	FUNDRAISING	\$4500.00
2/1/2014	GG DIRECT 351 Riverside Industrial Parkway Portland, ME, 04103		\$1000.00
TOTAL UNPAID DEBTS AND OBLIGATIONS			\$5500.00



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

2019 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
WORKING FAMILIES PAC 128R NORTH ST PORTLAND, ME, 04101 PHONE:(207) 272-9182 EMAIL: DIANERUSSELL207@GMAIL.COM		Mrs. EIRANNE CHRISTY 468 WEBBS MILL RD RAYMOND, ME, 04071 PHONE:(207) 478-1268 EMAIL: EIRANNE.HART@YAHOO.COM	
REPORT	DUE DATE	REPORTING PERIOD	
April Quarterly Report	04/10/2019	01/01/2019 - 03/31/2019	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$54.00	\$54.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$54.00	\$54.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$15.00	\$15.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$15.00	\$15.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$13,465.93	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$54.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$15.00	
12. CASH BALANCE AT END OF PERIOD	\$13,504.93	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$5,500.00	

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

REPORT FILED BY: EIRANNE CHRISTY
 REPORT FILED ON: 4/11/2019 9:00:14 AM
 LAST MODIFIED:
 COMMITTEE ID: 4245

**SCHEDULE A
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- | | |
|--|--|
| 1 = Individual | 9 = Candidate / Candidate Committee |
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| 3 = Commercial Source | 11 = Transfer from Previous Campaign |
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| 6 = Political Party Committee | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee | 15 = MCEA Payment |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
3/31/2019	Contributors giving \$50 or less		12	\$54.00
TOTAL CASH CONTRIBUTIONS				\$54.00

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
1/31/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Bank fee	OTH	\$5.00
2/28/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Bank fee	OTH	\$5.00
3/31/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Bank fee	OTH	\$5.00
TOTAL OPERATING EXPENDITURES				\$15.00



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

2019 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
WORKING FAMILIES PAC 128R NORTH ST PORTLAND, ME, 04101 PHONE:(207) 272-9182 EMAIL: DIANERUSSELL207@GMAIL.COM		Mrs. EIRANNE CHRISTY 468 WEBBS MILL RD RAYMOND, ME, 04071 PHONE:(207) 478-1268 EMAIL: EIRANNE.HART@YAHOO.COM	
REPORT	DUE DATE	REPORTING PERIOD	
July Quarterly Report	07/15/2019	04/01/2019 - 06/30/2019	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$54.00	\$54.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$54.00	\$54.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$15.00	\$30.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$15.00	\$30.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$13,504.93	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$54.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$15.00	
12. CASH BALANCE AT END OF PERIOD	\$13,543.93	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$5,500.00	

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

REPORT FILED BY: EIRANNE CHRISTY
 REPORT FILED ON: 7/15/2019 8:27:55 PM
 LAST MODIFIED:
 COMMITTEE ID: 4245

**SCHEDULE A
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- | | |
|--|--|
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| 2 = Candidate/ Spouse/ Domestic Partner | 10 = General Treasury Transfer |
| 3 = Commercial Source | 11 = Transfer from Previous Campaign |
| 4 = Nonprofit Organization | 12 = Contributors giving \$50 or less |
| 5 = Political Action Committee | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee | 15 = MCEA Payment |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
6/30/2019	Contributors giving \$50 or less	Combined donations from full reporting period of \$50 or less.	12	\$54.00
TOTAL CASH CONTRIBUTIONS				\$54.00

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
4/30/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Monthly Bank Fee.	OTH	\$5.00
5/31/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Monthly Bank Fee.	OTH	\$5.00
6/30/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Monthly Bank Fee.	OTH	\$5.00
TOTAL OPERATING EXPENDITURES				\$15.00



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

2019 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
WORKING FAMILIES PAC 128R NORTH ST PORTLAND, ME, 04101 PHONE:(207) 272-9182 EMAIL: DIANERUSSELL207@GMAIL.COM		Mrs. EIRANNE CHRISTY 468 WEBBS MILL RD RAYMOND, ME, 04071 PHONE:(207) 478-1268 EMAIL: EIRANNE.HART@YAHOO.COM	
REPORT	DUE DATE	REPORTING PERIOD	
October Quarterly Report	10/07/2019	07/01/2019 - 09/30/2019	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$54.00	\$162.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$54.00	\$162.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$15.00	\$45.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$15.00	\$45.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$13,543.93	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$54.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$15.00	
12. CASH BALANCE AT END OF PERIOD	\$13,582.93	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$5,500.00	

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

REPORT FILED BY: EIRANNE CHRISTY
 REPORT FILED ON: 10/7/2019 10:37:31 PM
 LAST MODIFIED:
 COMMITTEE ID: 4245

**SCHEDULE A
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- | | |
|--|--|
| 1 = Individual | 9 = Candidate / Candidate Committee |
| 2 = Candidate/ Spouse/ Domestic Partner | 10 = General Treasury Transfer |
| 3 = Commercial Source | 11 = Transfer from Previous Campaign |
| 4 = Nonprofit Organization | 12 = Contributors giving \$50 or less |
| 5 = Political Action Committee | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee | 15 = MCEA Payment |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
9/30/2019	Contributors giving \$50 or less	Aggregate total of donors giving \$50 or less.	12	\$54.00
TOTAL CASH CONTRIBUTIONS				\$54.00

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
7/31/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Monthly Bank Fee	OTH	\$5.00
8/31/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Monthly Bank Fee	OTH	\$5.00
9/30/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Monthly Bank Fee	OTH	\$5.00
TOTAL OPERATING EXPENDITURES				\$15.00



Commission on Governmental Ethics and Election Practices
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 Fax: 207-287-6775

2020 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
WORKING FAMILIES PAC 4 Oak Street Saco, ME 04072 PHONE:(207) 272-9182 EMAIL: DIANERUSSELL207@GMAIL.COM		Mrs. EIRANNE CHRISTY 468 WEBBS MILL RD RAYMOND, ME 04071 PHONE: EMAIL: EIRANNE.HART@YAHOO.COM	
REPORT	DUE DATE	REPORTING PERIOD	
January Quarterly Report	01/15/2020	10/01/2019 - 12/31/2019	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$54.00	\$216.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$54.00	\$216.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$17.22	\$62.22
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$17.22	\$62.22
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$13,582.93	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$54.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$17.22	
12. CASH BALANCE AT END OF PERIOD	\$13,619.71	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$5,500.00	

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

REPORT FILED BY: EIRANNE CHRISTY
 REPORT FILED ON: 1/15/2020 5:28:13 PM
 LAST MODIFIED:
 COMMITTEE ID: 4245

**SCHEDULE A
CASH CONTRIBUTIONS**

- For contributors who gave more that \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- | | |
|--|--|
| 1 = Individual | 9 = Candidate / Candidate Committee |
| 2 = Candidate/ Spouse/ Domestic Partner | 10 = General Treasury Transfer |
| 3 = Commercial Source | 11 = Transfer from Previous Campaign |
| 4 = Nonprofit Organization | 12 = Contributors giving \$50 or less |
| 5 = Political Action Committee | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee | 15 = MCEA Payment |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
10/27/2019	Contributors giving \$50 or less	Small donor contributions	12	\$18.00
11/24/2019	Contributors giving \$50 or less	Small donor contribution	12	\$5.00
12/1/2019	Contributors giving \$50 or less	Small donor contributions	12	\$13.00
12/29/2019	Contributors giving \$50 or less	Small donor contributions	12	\$18.00
TOTAL CASH CONTRIBUTIONS				\$54.00

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
APP	Apparel (t-shirts, hats, embroidery, etc.)	CON	Contribution to party committee, non-profit, other candidate, etc.	
EQP	Equipment of \$50 or more (computer, tablet, phone, furniture, etc.)	EVT	Campaign and fundraising events (venue or booth rental, entertainment, supplies, etc.)	
FOD	Food for campaign events or volunteers, catering	HRD	Hardware and small tools (hammer, nails, lumber, paint, etc.)	
LIT	Printed campaign materials (palmcards, signs, stickers, flyers, etc.)	MHS	Mail house and direct mail (design, printing, mailing, and postage all included)	
NEW	Newspaper and print media ads only	OFF	Office supplies, rent, utilities, internet service, phone minutes and data	
ONL	Social media and online advertising only	OTH	Other and fees (bank, contribution, and money order fees, etc.)	
PER	Personnel and campaign staff, consulting, and independent contractor costs	PHO	Phones (phone banking, robocalls and texts)	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Professional services (graphic design, legal services, web design, etc.)	RAD	Radio ads, production costs	
TKT	Entrance cost to event (bean suppers, fairs, party events, etc.)	TRV	Travel (fuel, mileage, lodging, etc.)	
TVN	TV/cable ads, production, and media buyer costs only	WEB	Website and internet costs (website domain and registration, etc.)	
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/31/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Bank Fee	OTH	\$5.00
11/30/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Bank Fee	OTH	\$5.00
12/30/2019	ACT BLUE 366 SUMMER STREET SOMERVILLE, MA, 02144	Payment Processing Fees for the quarter.	OTH	\$2.22
12/31/2019	Five County Credit Union PO BOX 598 BATH, ME, 04530	Bank Fee.	OTH	\$5.00
TOTAL OPERATING EXPENDITURES				\$17.22

**SCHEDULE D
UNPAID DEBTS AND OBLIGATIONS**

- A debt or obligation is incurred if a committee places an order for a good or service without making a payment; makes a promise or agreement to pay for a good or service; signs a contract for a good or service; or receives delivery of a good or service for which the committee has not paid.
- This schedule is a list of all debts and obligations of the committee as of the end of this reporting period.

DATE OF OBLIGATION	CREDITOR	DESCRIPTION	AMOUNT
7/15/2013	PowerThru LLC 1740 Hinesburg Road Richmond, ME, 05477	FUNDRAISING	\$4,500.00
2/1/2014	GG DIRECT 351 Riverside Industrial Parkway Portland, ME, 04103		\$1,000.00
TOTAL UNPAID DEBTS AND OBLIGATIONS			\$5,500.00



Commission on Governmental Ethics and Election Practices
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 Website: www.maine.gov/ethics
 Phone: 207-287-4179
 Fax: 207-287-6775

2020 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
WORKING FAMILIES PAC 4 Oak Street Saco, ME 04072 PHONE:(207) 272-9182 EMAIL: DIANERUSSELL207@GMAIL.COM		Mrs. EIRANNE CHRISTY 468 WEBBS MILL RD RAYMOND, ME 04071 PHONE: EMAIL: EIRANNE.HART@YAHOO.COM	
REPORT	DUE DATE	REPORTING PERIOD	
April Quarterly	04/10/2020	01/01/2020 - 03/31/2020	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$54.00	\$54.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$54.00	\$54.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$15.00	\$15.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$15.00	\$15.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$13,619.71	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$54.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$15.00	
12. CASH BALANCE AT END OF PERIOD	\$13,658.71	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$5,500.00	

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

REPORT FILED BY: EIRANNE CHRISTY
 REPORT FILED ON: 4/13/2020 11:41:21 AM
 LAST MODIFIED:
 COMMITTEE ID: 4245

**SCHEDULE A
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- | | |
|--|--|
| 1 = Individual | 9 = Candidate / Candidate Committee |
| 2 = Candidate/ Spouse/ Domestic Partner | 10 = General Treasury Transfer |
| 3 = Commercial Source | 11 = Transfer from Previous Campaign |
| 4 = Nonprofit Organization | 12 = Contributors giving \$50 or less |
| 5 = Political Action Committee | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee | 15 = MCEA Payment |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
3/31/2020	Contributors giving \$50 or less	Aggregate total of the contributions from this quarter, each individual under \$50 total.	12	\$54.00
TOTAL CASH CONTRIBUTIONS				\$54.00

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
APP	Apparel (t-shirts, hats, embroidery, etc.)	CON	Contribution to party committee, non-profit, other candidate, etc.	
EQP	Equipment of \$50 or more (computer, tablet, phone, furniture, etc.)	EVT	Campaign and fundraising events (venue or booth rental, entertainment, supplies, etc.)	
FOD	Food for campaign events or volunteers, catering	HRD	Hardware and small tools (hammer, nails, lumber, paint, etc.)	
LIT	Printed campaign materials (palmcards, signs, stickers, flyers, etc.)	MHS	Mail house and direct mail (design, printing, mailing, and postage all included)	
NEW	Newspaper and print media ads only	OFF	Office supplies, rent, utilities, internet service, phone minutes and data	
ONL	Social media and online advertising only	OTH	Other and fees (bank, contribution, and money order fees, etc.)	
PER	Personnel and campaign staff, consulting, and independent contractor costs	PHO	Phones (phone banking, robocalls and texts)	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Professional services (graphic design, legal services, web design, etc.)	RAD	Radio ads, production costs	
TKT	Entrance cost to event (bean suppers, fairs, party events, etc.)	TRV	Travel (fuel, mileage, lodging, etc.)	
TVN	TV/cable ads, production, and media buyer costs only	WEB	Website and internet costs (website domain and registration, etc.)	
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
1/31/2020	Five County Credit Union PO BOX 598 BATH, ME, 04530	Monthly Bank Fee	OTH	\$5.00
2/29/2020	Five County Credit Union PO BOX 598 BATH, ME, 04530	Monthly Bank Fee	OTH	\$5.00
3/31/2020	Five County Credit Union PO BOX 598 BATH, ME, 04530	Monthly Bank Fee	OTH	\$5.00
TOTAL OPERATING EXPENDITURES				\$15.00

**SCHEDULE D
UNPAID DEBTS AND OBLIGATIONS**

- A debt or obligation is incurred if a committee places an order for a good or service without making a payment; makes a promise or agreement to pay for a good or service; signs a contract for a good or service; or receives delivery of a good or service for which the committee has not paid.
- This schedule is a list of all debts and obligations of the committee as of the end of this reporting period.

DATE OF OBLIGATION	CREDITOR	DESCRIPTION	AMOUNT
7/15/2013	PowerThru LLC 1740 Hinesburg Road Richmond, ME, 05477	FUNDRAISING	\$4,500.00
2/1/2014	GG DIRECT 351 Riverside Industrial Parkway Portland, ME, 04103		\$1,000.00
TOTAL UNPAID DEBTS AND OBLIGATIONS			\$5,500.00



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2020 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
WORKING FAMILIES PAC 4 Oak Street Saco, ME 04072 PHONE:(207) 272-9182 EMAIL: DIANERUSSELL207@GMAIL.COM		Mrs. EIRANNE CHRISTY 468 WEBBS MILL RD RAYMOND, ME 04071 PHONE: EMAIL: EIRANNE.HART@YAHOO.COM	
REPORT	DUE DATE	REPORTING PERIOD	
11-Day Pre-Primary Election Report	07/06/2020	04/01/2020 - 06/30/2020	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$54.00	\$54.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$54.00	\$54.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$15.00	\$30.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$15.00	\$30.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$13,658.71	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$54.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$15.00	
12. CASH BALANCE AT END OF PERIOD	\$13,697.71	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$5,500.00	

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

REPORT FILED BY: EIRANNE CHRISTY
 REPORT FILED ON: 7/9/2020 1:18:26 PM
 LAST MODIFIED:
 COMMITTEE ID: 4245

**SCHEDULE A
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- | | |
|--|--|
| 1 = Individual | 9 = Candidate / Candidate Committee |
| 2 = Candidate/ Spouse/ Domestic Partner | 10 = General Treasury Transfer |
| 3 = Commercial Source | 11 = Transfer from Previous Campaign |
| 4 = Nonprofit Organization | 12 = Contributors giving \$50 or less |
| 5 = Political Action Committee | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee | 15 = MCEA Payment |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
6/30/2020	Contributors giving \$50 or less	Small Donor Aggregate	12	\$54.00
TOTAL CASH CONTRIBUTIONS				\$54.00

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
APP	Apparel (t-shirts, hats, embroidery, etc.)	CON	Contribution to party committee, non-profit, other candidate, etc.	
EQP	Equipment of \$50 or more (computer, tablet, phone, furniture, etc.)	EVT	Campaign and fundraising events (venue or booth rental, entertainment, supplies, etc.)	
FOD	Food for campaign events or volunteers, catering	HRD	Hardware and small tools (hammer, nails, lumber, paint, etc.)	
LIT	Printed campaign materials (palmcards, signs, stickers, flyers, etc.)	MHS	Mail house and direct mail (design, printing, mailing, and postage all included)	
NEW	Newspaper and print media ads only	OFF	Office supplies, rent, utilities, internet service, phone minutes and data	
ONL	Social media and online advertising only	OTH	Other and fees (bank, contribution, and money order fees, etc.)	
PER	Personnel and campaign staff, consulting, and independent contractor costs	PHO	Phones (phone banking, robocalls and texts)	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Professional services (graphic design, legal services, web design, etc.)	RAD	Radio ads, production costs	
TKT	Entrance cost to event (bean suppers, fairs, party events, etc.)	TRV	Travel (fuel, mileage, lodging, etc.)	
TVN	TV/cable ads, production, and media buyer costs only	WEB	Website and internet costs (website domain and registration, etc.)	
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
4/30/2020	Five County Credit Union PO BOX 598 BATH, ME, 04530	Bank Fee	OTH	\$5.00
5/31/2020	Five County Credit Union PO BOX 598 BATH, ME, 04530	Bank Fee	OTH	\$5.00
6/30/2020	Five County Credit Union PO BOX 598 BATH, ME, 04530	Bank Fee	OTH	\$5.00
TOTAL OPERATING EXPENDITURES				\$15.00

**SCHEDULE D
UNPAID DEBTS AND OBLIGATIONS**

- A debt or obligation is incurred if a committee places an order for a good or service without making a payment; makes a promise or agreement to pay for a good or service; signs a contract for a good or service; or receives delivery of a good or service for which the committee has not paid.
- This schedule is a list of all debts and obligations of the committee as of the end of this reporting period.

DATE OF OBLIGATION	CREDITOR	DESCRIPTION	AMOUNT
7/15/2013	PowerThru LLC 1740 Hinesburg Road Richmond, ME, 05477	FUNDRAISING	\$4,500.00
2/1/2014	GG DIRECT 351 Riverside Industrial Parkway Portland, ME, 04103		\$1,000.00
TOTAL UNPAID DEBTS AND OBLIGATIONS			\$5,500.00



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 Fax: 207-287-6775

2020 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
WORKING FAMILIES PAC 4 Oak Street Saco, ME 04072 PHONE:(207) 272-9182 EMAIL: DIANERUSSELL207@GMAIL.COM		Mrs. EIRANNE CHRISTY 468 WEBBS MILL RD RAYMOND, ME 04071 PHONE: EMAIL: EIRANNE.HART@YAHOO.COM	
REPORT	DUE DATE	REPORTING PERIOD	
42-Day Post-Primary Election Report	08/25/2020	07/01/2020 - 08/18/2020	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$18.00	\$126.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$18.00	\$126.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$0.00	\$30.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$0.00	\$30.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$13,697.71	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$18.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$0.00	
12. CASH BALANCE AT END OF PERIOD	\$13,715.71	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$5,500.00	

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

REPORT FILED BY: EIRANNE CHRISTY
 REPORT FILED ON: 8/25/2020 10:39:54 PM
 LAST MODIFIED:
 COMMITTEE ID: 4245

**SCHEDULE A
CASH CONTRIBUTIONS**

- For contributors who gave more that \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- | | |
|--|--|
| 1 = Individual | 9 = Candidate / Candidate Committee |
| 2 = Candidate/ Spouse/ Domestic Partner | 10 = General Treasury Transfer |
| 3 = Commercial Source | 11 = Transfer from Previous Campaign |
| 4 = Nonprofit Organization | 12 = Contributors giving \$50 or less |
| 5 = Political Action Committee | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee | 15 = MCEA Payment |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
8/18/2020	Contributors giving \$50 or less	Under \$50 aggregated	12	\$18.00
TOTAL CASH CONTRIBUTIONS				\$18.00

**SCHEDULE D
UNPAID DEBTS AND OBLIGATIONS**

- A debt or obligation is incurred if a committee places an order for a good or service without making a payment; makes a promise or agreement to pay for a good or service; signs a contract for a good or service; or receives delivery of a good or service for which the committee has not paid.
- This schedule is a list of all debts and obligations of the committee as of the end of this reporting period.

DATE OF OBLIGATION	CREDITOR	DESCRIPTION	AMOUNT
7/15/2013	PowerThru LLC 1740 Hinesburg Road Richmond, ME, 05477	FUNDRAISING	\$4,500.00
2/1/2014	GG DIRECT 351 Riverside Industrial Parkway Portland, ME, 04103		\$1,000.00
TOTAL UNPAID DEBTS AND OBLIGATIONS			\$5,500.00



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

2020 REGISTRATION: POLITICAL ACTION COMMITTEE

COMMITTEE INFORMATION	
WORKING FAMILIES PAC 32 Grant St. Portland, ME 04101 PAC TYPE: Regular	Phone: (207) 272-9182 Fax: Email: DIANERUSSELL207@GMAIL.COM Web:
TREASURER INFORMATION	
Vacant Vacant Vacant Vacant, ME 00000	Public: Fax: Email: Nosend.Vacant@maine.gov
PRINCIPAL OFFICER INFORMATION	
DIANE RUSSELL Principal Officer ME	Public: (207) 272-9182 Email: DIANERUSSELL207@GMAIL.COM
DECISION MAKERS AND FUNDRAISERS	
LEGISLATORS AND CANDIDATES WITH A SIGNIFICANT ROLE IN THIS PAC	
FORM OF ORGANIZATION	
VOLUNTARY ASSOCIATION	Date of origin / incorporation 05/22/2013
FOUNDING ORGANIZATIONS	
STATEMENT OF SUPPORT OR OPPOSITION	
SUPPORT	THE WORKING FAMILIES PAC WILL HELP SUPPORT DEMOCRATS IN WINNING SEATS IN THE MAINE HOUSE.
CERTIFICATION	
I, Vacant Vacant, certify that the information in this registration is true, accurate, and complete.	
SIGNATURE	Date: September 03, 2020

Filed Date: 5/22/2013
 Amended Date: 9/3/2020

PAC Registration



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

2020 REGISTRATION: POLITICAL ACTION COMMITTEE

COMMITTEE INFORMATION	
WORKING FAMILIES PAC 4 Oak Street Saco, ME 04072 PAC TYPE: Regular	Phone: (207) 272-9182 Fax: Email: DIANERUSSELL207@GMAIL.COM Web:
TREASURER INFORMATION	
Mrs. EIRANNE CHRISTY 468 WEBBS MILL RD RAYMOND, ME 04071	Public: Fax: Email: EIRANNE.HART@YAHOO.COM
PRINCIPAL OFFICER INFORMATION	
DIANE RUSSELL Principal Officer ME	Public: (207) 272-9182 Email: DIANERUSSELL207@GMAIL.COM
DECISION MAKERS AND FUNDRAISERS	
LEGISLATORS AND CANDIDATES WITH A SIGNIFICANT ROLE IN THIS PAC	
FORM OF ORGANIZATION	
VOLUNTARY ASSOCIATION	Date of origin / incorporation 05/22/2013
FOUNDING ORGANIZATIONS	
STATEMENT OF SUPPORT OR OPPOSITION	
CERTIFICATION	
I, Mrs. EIRANNE CHRISTY, certify that the information in this registration is true, accurate, and complete.	
SIGNATURE	Date: April 13, 2020

Filed Date: 5/22/2013
Amended Date: 4/13/2020

PAC Registration



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

2019 REGISTRATION: POLITICAL ACTION COMMITTEE

COMMITTEE INFORMATION	
WORKING FAMILIES PAC 128R NORTH ST PORTLAND, ME 04101 PAC TYPE: Regular	Phone: (207) 272-9182 Fax: Email: DIANERUSSELL207@GMAIL.COM Web:
TREASURER INFORMATION	
Mrs. EIRANNE CHRISTY 468 WEBBS MILL RD RAYMOND, ME 04071	Public: Fax: Email: EIRANNE.HART@YAHOO.COM
PRINCIPAL OFFICER INFORMATION	
DIANE RUSSELL Principal Officer ME	Public: (207) 272-9182 Email: DIANERUSSELL207@GMAIL.COM
DECISION MAKERS AND FUNDRAISERS	
LEGISLATORS AND CANDIDATES WITH A SIGNIFICANT ROLE IN THIS PAC	
FORM OF ORGANIZATION	
VOLUNTARY ASSOCIATION	Date of origin / incorporation 05/22/2013
FOUNDING ORGANIZATIONS	
STATEMENT OF SUPPORT OR OPPOSITION	
CERTIFICATION	
I, Mrs. EIRANNE CHRISTY, certify that the information in this registration is true, accurate, and complete.	
SIGNATURE	Date: November 22, 2019

Filed Date: 5/22/2013
Amended Date: 11/22/2019

PAC Registration

ACTBLUE PAYMENTS TO WORKING FAMILIES PAC

Committee Name	Payee	Date	Expenditure Type	Amount
ACTBLUE MAINE	WORKING FAMILIES PAC	12/27/2020	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	11/29/2020	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	11/1/2020	Monetary (Itemized)	\$ 13.57
ACTBLUE MAINE	WORKING FAMILIES PAC	10/25/2020	Monetary (Itemized)	\$ 8.22
ACTBLUE MAINE	WORKING FAMILIES PAC	9/27/2020	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	8/30/2020	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	8/23/2020	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	8/2/2020	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	7/26/2020	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	6/28/2020	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	5/31/2020	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	5/24/2020	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	5/3/2020	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	4/26/2020	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	3/29/2020	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	3/1/2020	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	2/23/2020	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	2/2/2020	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	1/26/2020	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	12/29/2019	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	12/1/2019	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	11/24/2019	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	10/27/2019	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	9/29/2019	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	9/1/2019	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	8/25/2019	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	7/28/2019	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	6/30/2019	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	6/23/2019	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	6/2/2019	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	5/26/2019	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	4/28/2019	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	3/31/2019	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	3/24/2019	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	3/3/2019	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	2/24/2019	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	1/27/2019	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	12/30/2018	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	12/23/2018	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	12/2/2018	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	11/25/2018	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	11/4/2018	Monetary (Itemized)	\$ 9.60

ACTBLUE MAINE	WORKING FAMILIES PAC	10/28/2018	Monetary (Itemized)	\$ 20.34
ACTBLUE MAINE	WORKING FAMILIES PAC	9/30/2018	Monetary (Itemized)	\$ 22.08
ACTBLUE MAINE	WORKING FAMILIES PAC	9/23/2018	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	9/2/2018	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	8/26/2018	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	7/29/2018	Monetary (Itemized)	\$ 17.28
ACTBLUE MAINE	WORKING FAMILIES PAC	6/30/2018	Monetary (Itemized)	\$ 12.48
ACTBLUE MAINE	WORKING FAMILIES PAC	6/24/2018	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	5/27/2018	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	4/29/2018	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	3/25/2018	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	2/25/2018	Monetary (Itemized)	\$ 4.80
ACTBLUE MAINE	WORKING FAMILIES PAC	1/28/2018	Monetary (Itemized)	\$ 4.80

TOTAL

\$ 586.45

From: [Eric Hoke](#)
To: [Dunn, Michael](#)
Cc: TREASURER@ACTBLUE.COM
Subject: Re: Maine Ethics Commission Investigation
Date: Monday, March 15, 2021 11:08:58 AM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Michael,

If the committee were to be administratively dissolved, we would deactivate their ActBlue account and they would no longer be able to accept new contributions. Please let me know if you have any additional questions or concerns.

Best,
Eric

On Mon, Mar 15, 2021 at 9:41 AM Dunn, Michael <Michael.Dunn@maine.gov> wrote:

Hi Erin:

The Maine Ethics has authorized an investigation into a political committee that uses Act Blue to collect contributions. The Commission staff is considering an administrative dissolution of the committee based on our findings. Our concern is that even if the Commission were to dissolve the committee that the contributions would continue to be processed and withdrawn by the officer. My question is that if the committee were administratively dissolved would Act Blue continue to process the payments? Please let me know at your earliest opportunity.

Thanks,

Michael J. Dunn, Esq.

Political Committee and Lobbyist Registrar

Maine Ethics Commission

135 State House Station
Augusta, Maine 04333

Phone: (207) 287-4179 Fax: (207) 287-6775

Confidentiality Notice | This e-mail message, including any attachments, has been sent from the Commission on Governmental Ethics and is for the sole use of the intended recipient(s). If you are not the intended recipient, you are asked not to distribute this message. If you are not the intended recipient, please delete it and contact the sender by reply e-mail. Thank you.

--

You received this message because you are subscribed to the Google Groups "treasurer" group.
To unsubscribe from this group and stop receiving emails from it, send an email to

treasurer+unsubscribe@actblue.com.

From: [Wayne, Jonathan](#)
To: [Dunn, Michael](#)
Cc: [Lavin, Paul](#)
Subject: Attempted Call to Diane Russell
Date: Tuesday, November 24, 2020 11:21:00 AM

I tried calling Diane Russell at (207) 272-9182. No one answered. After it rang about six times, I heard an automated message stating that the mailbox was full, and could not receive any messages.

From: [Wayne, Jonathan](#)
To: dianerussell207@gmail.com
Cc: [Dunn, Michael](#)
Subject: Need to File PAC Reports
Date: Wednesday, November 18, 2020 4:16:00 PM
Attachments: [image001.png](#)

Diane,

The Working Families PAC was required to file two campaign finance reports that were due in October.

After speaking to Eiranne Hart, we understand that you have been filing the reports for the PAC.

If you have any questions, please reach out to my colleague, Michael Dunn, who is copied on this email.

If we don't hear back from you, this will likely be placed on the agenda of the Commission's December 18, 2020 meeting.

Thank you.

Jonathan Wayne
Maine Ethics Commission
287-4179

TYPE OF REPORT	FILING DEADLINE (11:59 P.M.)	REPORT PERIOD
April Quarterly Report	April 10, 2020	January 1 - March 31, 2020
11-Day Pre-Primary Report	July 6, 2020	April 1 - June 30, 2020
42-Day Post-Primary Report	August 25, 2020	July 1 - August 18, 2020
October Quarterly Report	October 5, 2020	August 19 - September 30, 2020
11-Day Pre-General Report	October 23, 2020	October 1 - October 20, 2020
42-Day Post-General Report	December 15, 2020	October 21 - December 8, 2020
January Quarterly Report	January 15, 2021	December 9 - December 31, 2020

From: [Wayne, Jonathan](#)
To: dianerussell207@gmail.com
Cc: [Dunn, Michael](#); [Lavin, Paul](#)
Subject: Please Call Ethics Commission at 287-4179
Date: Tuesday, November 24, 2020 11:25:00 AM
Attachments: [image001.png](#)

Diane,

It's increasingly important for you to call Michael Dunn in our office. Please call him at 287-4179. We need you to file two campaign finance reports for the Working Families PAC, or this matter will be scheduled for the Commission's public meeting on December 18, 2020.

Thank you.

Jonathan Wayne
Maine Ethics Commission
287-4179

From: Wayne, Jonathan
Sent: Wednesday, November 18, 2020 4:16 PM
To: dianerussell207@gmail.com
Cc: Dunn, Michael <Michael.Dunn@maine.gov>
Subject: Need to File PAC Reports

Diane,

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Jonathan Wayne
Maine Ethics Commission
287-4179

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11-Day Pre-General Report	October 23, 2020	October 1 - October 20, 2020
42-Day Post-General Report	December 15, 2020	October 21 - December 8, 2020
January Quarterly Report	January 15, 2021	December 9 - December 31, 2020

From: [Wayne, Jonathan](#)
To: dianerussell207@gmail.com
Cc: [Dunn, Michael](#); [Lavin, Paul](#); [Brann, Lorrie J](#)
Subject: Ethics Commission's - December 18 Meeting
Date: Thursday, December 10, 2020 5:02:53 PM
Attachments: [image001.png](#)

Diane,

The Ethics Commission is meeting by Zoom on December 18, 2020. The staff will be recommending an investigation of the Working Families PAC to make sure its previous reports have substantially conformed to the PAC disclosure requirements. Part of our concern is that the cover page of the reports indicates that the PAC has a cash balance of over \$13,000, which may not be accurate.

Here is a link to the meeting agenda and materials:
<https://www.maine.gov/ethics/meeting/2020-12-18>
Please see the materials for item #4.

We are still happy to work with you to minimize these issues, but you would need to file the two campaign finance reports due in October.

Could you please contact Michael Dunn in our office?

Thank you.

Jonathan Wayne

From: Wayne, Jonathan
Sent: Tuesday, November 24, 2020 11:25 AM
To: dianerussell207@gmail.com <dianerussell207@gmail.com>
Cc: Dunn, Michael <Michael.Dunn@maine.gov>; Lavin, Paul <Paul.Lavin@maine.gov>
Subject: Please Call Ethics Commission at 287-4179

Diane,

It's increasingly important for you to call Michael Dunn in our office. Please call him at 287-4179. We need you to file two campaign finance reports for the Working Families PAC, or this matter will be scheduled for the Commission's public meeting on December 18, 2020.

Thank you.

Jonathan Wayne
Maine Ethics Commission
287-4179

From: Wayne, Jonathan
Sent: Wednesday, November 18, 2020 4:16 PM
To: dianerussell207@gmail.com

Cc: Dunn, Michael <Michael.Dunn@maine.gov>

Subject: Need to File PAC Reports

Diane,

The Working Families PAC was required to file two campaign finance reports that were due in October.

After speaking to Eiranne Hart, we understand that you have been filing the reports for the PAC.

If you have any questions, please reach out to my colleague, Michael Dunn, who is copied on this email.

If we don't hear back from you, this will likely be placed on the agenda of the Commission's December 18, 2020 meeting.

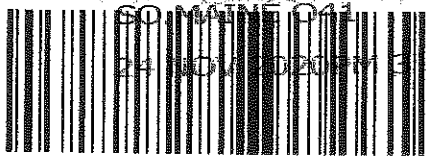
Thank you.

Jonathan Wayne
Maine Ethics Commission
287-4179

TYPE OF REPORT	FILING DEADLINE (11:59 P.M.)	REPORT PERIOD
April Quarterly Report	April 10, 2020	January 1 - March 31, 2020
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42-Day Post-General Report	December 15, 2020	October 21 - December 8, 2020
January Quarterly Report	January 15, 2021	December 9 - December 31, 2020

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

CERTIFIED MAIL



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Hon. Diane Russell
Working Families PAC
32 Grant Street
Portland, ME 04101



Received
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Ethics Commission

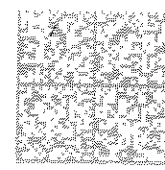
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AND ELECTION PRACTICES
135 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0135



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Maine Ethics Commission

Ms. Diane Russell
Working Families PAC
32 Grant St.
Portland, ME 04101

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AND ELECTION PRACTICES
135 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0135



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Maine Ethics Commission

Hon. Diane Russell
Working Families PAC
32 Grant St.
Portland, ME 04101

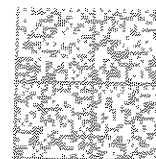
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COMMISSION ON GOVERNMENTAL ETHICS
AND ELECTION PRACTICES
135 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0135



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Received
FEB 23 2021
Maine Ethics Commission

Ms. Diane Russell
Working Families PAC
32 Grant St.
Portland, ME 04101

NIXIE 015 FE 1 0002/16/21

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Title 21-A Maine Revised Statutes

§ 1003. Investigations by commission

1. Investigations. The commission may undertake audits and investigations to determine whether a person has violated this chapter, chapter 14 or the rules of the commission. For this purpose, the commission may subpoena witnesses and records whether located within or without the State and take evidence under oath. A person or entity that fails to obey the lawful subpoena of the commission or to testify before it under oath must be punished by the Superior Court for contempt upon application by the Attorney General on behalf of the commission. The Attorney General may apply on behalf of the commission to the Superior Court or to a court of another state to enforce compliance with a subpoena issued to a nonresident person. Service of any subpoena issued by the commission may be accomplished by:

- A.** Delivering a duly executed copy of the notice to the person to be served or to a partner or to any officer or agent authorized by appointment or by law to receive service of process on behalf of that person;
- B.** Delivering a duly executed copy of the notice to the principal place of business in this State of the person to be served; or
- C.** Mailing by registered or certified mail a duly executed copy of the notice, addressed to the person to be served, to the person's principal place of business.

...

§ 1017. Reports by candidates

1. Federal candidates. [2007, c. 443, Pt. A, § 16 (RP).]

2. Gubernatorial candidates. A treasurer of a candidate for the office of Governor shall file reports with the commission as follows. Once the first required report has been filed, each subsequent report must cover the period from the end date of the prior report filed.

...

F. Unless further reports will be filed in relation to a later election in the same calendar year, the disposition of any surplus or deficit in excess of \$100 shown in the reports described in paragraph E must be reported as provided in this paragraph. The treasurer of a candidate or political committee with a surplus or deficit in excess of \$100 shall file reports semiannually with the commission within 15 days following the end of the 2nd and 4th quarters of the State's fiscal year, complete as of the last day of the quarter, until the surplus is disposed of or the deficit is liquidated. The first report under this paragraph is not required until the 15th day of the period beginning at least 90 days from the date of the election. The reports will be considered timely if filed electronically or in person with the commission on that date or postmarked on that date. The reports must set forth any contributions for the purpose of

liquidating the deficit, in the same manner as contributions are set forth in other reports required in this section.

...

§ 1020-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 7, the commission shall determine whether a report satisfies the requirements for timely filing. The commission may waive a penalty in whole or in part if the commission determines that the penalty is disproportionate to the size of the candidate's campaign, the level of experience of the candidate, treasurer or campaign staff or 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 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;
- C.** Failure to receive notice of the filing deadline; or
- D.** 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.

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4-A. 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 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 registration or report may be provisionally filed by transmission of a facsimile copy of the duly executed report to the commission, as long as the facsimile copy is filed by the applicable deadline and an original of the same report is received by the commission within 5 calendar days thereafter.

5. Repealed. Pursuant to its terms, eff. Aug. 1, 2002.

5-A. Maximum penalties. Penalties assessed under this subchapter may not exceed:

A. Five thousand dollars for reports required under section 1017, subsection 2, paragraph B, C, D, E or H; section 1017, subsection 3-A, paragraph B, C, D, D-1 or F; and section 1017, subsection 4, 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;

A-1. Five thousand dollars for reports required under section 1019-B, subsection 4, 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;

B. Five thousand dollars for state party committee reports required under section 1017-A, subsection 4-A, paragraphs A, B, C and E, 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;

C. One thousand dollars for reports required under section 1017, subsection 2, paragraphs A and F and section 1017, subsection 3-A, paragraphs A and E; or

D. Five hundred dollars for municipal, district and county committees for reports required under section 1017-A, subsection 4-B.

E. Repealed. Laws 2011, c. 558, § 5.

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7. Final notice of penalty. If a determination has been requested by the candidate or political committee and made by the commission, notice of the commission's final determination and the penalty, if any, imposed pursuant to this subchapter must be sent to the candidate and the political committee.

If a determination is not requested, the preliminary penalty calculated by the commission staff is final. The commission staff shall mail final notice of the penalty to the candidate and treasurer. A detailed summary of all notices must be provided to the commission.

8. Failure to file report. The commission shall notify a candidate who has failed to file a report required by this subchapter, in writing, informing the candidate of the requirement to file a report. The notice must be sent by certified mail. If a candidate fails to file a report after 2 notices have been sent by the commission, the commission shall send a final notice by certified mail informing the candidate of the requirement to file and that the matter may be referred to the Attorney General for criminal prosecution. A candidate who fails to file a report as required by this subchapter after the commission has sent the notices required by this subsection is guilty of a Class E crime.

8-A. Penalties for failure to file report. The penalty for failure to file a report required under this subchapter may not exceed the maximum penalties as provided in subsection 5-A.

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§ 1052-A. Registration

A political action committee shall register with the commission and amend its registration as required by this section. A registration is not timely filed unless it contains all the information required in this section.

1. Deadlines to file and amend registrations. A political action committee shall register and file amendments with the commission according to the following schedule.

A. A political action committee as defined under section 1052, subsection 5, paragraph A, subparagraph (1) or (4) that receives contributions or makes expenditures in the aggregate in excess of \$1,500 and a political action committee as defined under section 1052, subsection 5, paragraph A, subparagraph (5) that receives contributions or makes expenditures in the aggregate in excess of \$5,000 for the purpose of influencing the nomination or election of any candidate to political office shall register with the commission within 7 days of exceeding the applicable amount.

B. A political action committee shall amend the registration within 10 days of a change in the information that political action committees are required to disclose under this section.

C. A political action committee shall file an updated registration form between January 1st and March 1st of each year in which a general election is held. The commission may waive the updated registration requirement for a newly registered political action committee or other registered political action committee if the commission determines that the requirement would cause an administrative burden disproportionate to the public benefit of the updated information.

2. Disclosure of treasurer and officers. A political action committee must have a treasurer and a principal officer. The same individual may not serve in both positions. The political action committee's registration must contain the names and addresses of the following individuals:

A. The treasurer of the political action committee;

B. A principal officer of the political action committee;

C. Any other individuals who are primarily responsible for making decisions for the political action committee;

D. The individuals who are primarily responsible for raising contributions for the political action committee; and

E. The names of any other candidates or Legislators who have a significant role in fund-raising or decision-making for the political action committee.

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5. Resignation and removal. An individual who resigns as the treasurer, principal officer or primary decision maker of a political action committee shall submit a written resignation statement to the commission. An individual's resignation is not effective until the commission receives the written resignation statement from the individual. If an individual is involuntarily removed from the position of treasurer, principal officer or primary decision maker by the political action committee, the political action committee shall notify the commission in writing that the individual has been removed from the position. The commission may prescribe forms for these purposes.

§ 1054. Appointment of treasurer; depository

Any political action committee required to register under section 1052-A must appoint a treasurer before registering with the commission. A registered political action committee shall deposit all funds contributed to or received by the political action committee for the purpose of influencing a campaign in a single account in a financial institution and shall finance all of the political action committee's expenditures to influence the election through the account. If the political action committee was formed by another organization, that other organization may pay its employees for their campaign-related activities on behalf of the political action committee through its own treasury, rather than through the single account established by the political action committee and used for campaign expenditures.

§ 1054-A. Duties and liabilities of the treasurer, principal officer and primary decision maker of political action committees

1. Duties of the treasurer. The treasurer of the political action committee shall ensure that the political action committee files and amends the political action committee's registration, files complete and accurate financial reports with the commission and maintains the political action committee's records as required by this chapter and the commission's rules. The treasurer is responsible for the political action committee's performance of these duties regardless of whether the treasurer has delegated administrative tasks related to these duties to another individual.

2. Joint responsibilities of the treasurer and principal officer. The treasurer and the principal officer are jointly responsible for the political action committee's compliance with the requirements of this chapter and the commission's rules. The treasurer and principal officer are responsible for accepting and responding to notices and correspondence from the commission on behalf of the political action committee.

3. Participation in spending decisions. An individual who is the treasurer, principal officer or primary decision maker of the political action committee and who has signed the acknowledgment statement required by section 1052-A, subsection 4 is deemed to have participated in the spending decisions of the political action committee until the commission receives the individual's resignation statement or a notice of the individual's involuntary removal from the political action committee.

4. Financial liability. The commission may hold the treasurer and principal officer jointly and severally liable with the political action committee for any fines assessed against the political action committee for violations of this chapter and chapter 14. In addition, the commission may assess all or part of a fine against any other agent of the political action committee who is directly responsible for a violation, including individuals who have resigned or have been removed involuntarily from the political action committee. In deciding whether to assess a penalty against a treasurer, principal officer or any other individual, the commission may consider, among other things, whether the individual had actual knowledge of the action that constituted the violation or had authorized that action and whether the violation was intentional or caused by an error by a vendor or someone outside the control of the political action committee.

§ 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.

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§ 1060. Content of reports

The reports must contain the following information and any additional information required by the commission to monitor the activities of political action committees:

- 1. Identification of candidates.** The names of and offices sought by all candidates whom the political action committee supports, intends to support or seeks to defeat;
- 2. Identification of committees; parties.** The names of all political committees or party committees supported in any way by the political action committee;
- 3. Identification of referendum or initiated petition.** The referenda or initiated petitions that the political action committee supports or opposes;
- 4. Itemized expenditures.** An itemization of each expenditure made to initiate or influence any campaign, including the date, payee and purpose of the expenditure; the name of each candidate, campaign, political committee, political action committee or party committee supported or opposed; and each referendum or initiated petition supported or opposed by the expenditure. If expenditures were made to a person described in section 1012, subsection 3, paragraph A, subparagraph (4), the report must contain the name of the person; the amount spent by that person on behalf of the candidate, campaign, political committee, political action committee, party committee, referendum or initiated petition, including, but not limited to, expenditures made during the signature gathering phase; the reason for the expenditure; and the date of the expenditure. The commission may specify the categories of expenditures that are to be reported to enable the commission to closely monitor the activities of political action committees;
- 5. Aggregate expenditures.** An aggregation of expenditures and cumulative aggregation of expenditures to a candidate, campaign, political committee, political action committee, party committee, referendum or initiated petition;
- 6. Identification of contributions.** Names, occupations, places of business and mailing addresses of contributors who have given more than \$50 to the political action committee in the reporting period and the amount and date of each contribution, except that an organization qualifying as a political action committee under section 1052, subsection 5, paragraph A, subparagraph (5) is required to report only those contributions made to the organization for the purpose of influencing a ballot question or the nomination or election of a candidate to political office and all transfers to or funds used to support the political action committee from the general treasury of the organization; and
- 7. Other expenditures.** Operational expenses and other expenditures that are not made on behalf of a candidate, committee or campaign, except that an organization qualifying as a political action committee under section 1052, subsection 5, paragraph A, subparagraph (5) is required to report only those expenditures made for the purpose of influencing a campaign.

§ 1062-A. Failure to file on time

1. Registration. A political action committee required to register under section 1052-A, 1053-A or 1053-B or a ballot question committee required to register under section 1053-A or 1056-B that fails to do so or that fails to provide the information required by the commission for registration may be assessed a fine of no more than \$2,500. In assessing a fine, the commission shall consider, among other things, whether the violation was intentional, the amount of campaign and financial activity that occurred before the committee registered, whether the committee intended to conceal its campaign or financial activity and the level of experience of the committee's volunteers and staff.

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.

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7. List of late-filing committees. The commission shall prepare a list of the names of committees that are late in filing a report required under section 1059, subsection 2, paragraph B, subparagraph (1) or section 1059, subsection 2, paragraph C or D within 30 days of the date of the election and shall make that list available for public inspection.

8. Failure to file. A person who fails to file a report as required by this subchapter within 30 days of the filing deadline is guilty of a Class E crime, except that, if a penalty pursuant to subsection 8-A is assessed and collected by the commission, the State may not prosecute a violation under this subsection.

8-A. Penalties for failure to file report. The commission may assess a civil penalty for failure to file a report required by this subchapter. The maximum penalty for failure to file a report required under section 1056-B or section 1059 is \$ 10,000 or the amount of financial activity not reported, whichever is greater.

9. Enforcement. A penalty assessed pursuant to this section that has not been paid in full within 30 days after issuance of a notice of the final determination may be enforced in accordance with section 1004-B.