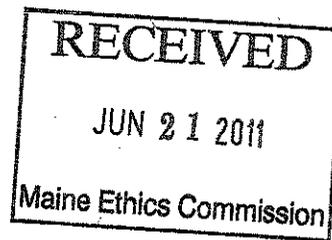


June 23, 2011

21 June 2011

Dear Mr. Wayne:

Thank you for your memo sent yesterday and, especially, for the research undertaken to produce it.

Rep. Crafts appears to have documented the sources of the vast majority of the small contributions to his Political Action Committee and demonstrated his effectiveness as a retail fundraiser. His assertion that the remaining funds came as cash contributions of less than \$50 seems plausible, given the demonstrated origin of those contributions that came as checks, and the great care that he put into assuring donors to the PAC did not exceed the \$50 threshold under which their identities would have to be disclosed to the public. Apart from perhaps having to report the origin of his \$122 donor, this matter has been researched to my satisfaction.

I therefore am writing to withdraw my request for further investigation.

However, the commission may wish to consider closing potential loopholes in our campaign finance reporting regulations, as I understand them, which might be used by malicious parties to circumvent public scrutiny. Perhaps it would be wise to require PACs, candidates, and ballot committees to photocopy small donor's checks (as Rep. Crafts has voluntarily done) and retain them for, say, a year, so that they can be produced in such situations. Also, in regards to cash donations smaller than \$50, perhaps each donor could sign for them on a form similar to that used for clean election candidates' \$5 seed donations, and that form also retained for a period of time. This would create paper trails that would ensure the integrity of the process.

Thank you again for your time in this matter and

Best Regards,
Colin Woodard
Portland, Maine



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

To: Commissioners
 From: Jonathan Wayne, Executive Director
 Date: June 20, 2011
 Re: Documented Contributions to the Working People for Hope and Change PAC

This memo provides you with additional information concerning the request to investigate the Working People for Hope and Change PAC. The PAC was organized in 2010 by Rep. Dale Crafts. The request is that the Commission verify whether the PAC received contributions of \$50 or less totaling \$6,888.17 that the PAC disclosed in reports filed on May 20 and October 12, 2010. Rep. Crafts explained in a June 3, 2011 letter to the Commission that a number of individuals volunteered for the PAC in the summer and fall of 2010 and collected small contributions from individuals in the amount of \$49.00.

On Thursday, June 16, 2011, Rep. Crafts visited the Commission office and allowed the staff to inspect photocopies of checks received by the PAC in 2010. Our review was relatively quick. Our scan of the checks disclosed a very large number of personal checks in the amount of \$49.00 and a few additional checks in other amounts. A temporary worker who sometimes fills in for our assistant made the following tally of the copied checks:

# of Contributors	Amount of Check	Total
114 contributors*	\$49.00	\$5,586.00
1 contributor	\$48.50	\$48.50
2 contributors	\$25.00	\$50.00
2 contributors	\$45.00	\$90.00
1 contributor	\$122.00	\$122.00
<i>Total</i>		\$5,896.50

*In a few instances, couples that were apparently married gave checks in the amount of \$98. In the tally, those were counted as two contributions of \$49.

The total of the photocopied checks (\$5,896.50) accounts for 86% of the \$6,888.17 in contributions under \$50 disclosed by the PAC. Rep. Crafts explained that the remaining portion of the \$6,888.17 total was collected *in cash* by the PAC's volunteers in similar small amounts.

One photocopied bank check was in the amount of \$122. I have asked Rep. Crafts whether that check was a contribution by a single donor or a combined payment of contributions from multiple people. Rep. Crafts told me that he would investigate that contribution and would get back to me. If that check consists of any contributions exceeding \$50, I will advise the PAC to amend its reports to identify the donor(s).

Thank you for your consideration of this memo.