

Agenda

Item #3



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

To: Commission Members

From: Jonathan Wayne, Executive Director

Date: December 19, 2008

Re: Rule-Making on Seed Money Maximum for Gubernatorial Candidates

In July 2008, the Commission agreed to accept public comment on a proposed rule amendment to increase the maximum amount of seed money which a gubernatorial candidate seeking Maine Clean Election Act funding can collect from \$50,000 to \$100,000. The Commission agreed at its October 27 meeting to accept public comment on a larger increase to \$150,000. On November 24, the Commission held a public hearing to receive comments on the \$150,000 proposal. At your December 19, 2008 meeting, you may wish to adopt either change. Any change to the current rule would be major substantive, and would need to be submitted to the Legislature for its consideration during the 2009 session.

I have attached:

- My memo to you dated November 17, 2008 in favor of increasing the seed money maximum to \$150,000. That remains the staff recommendation.
- Summary of the comments received at your November 24 public hearing.
- The original draft rule amendment for a maximum of \$100,000.
- Written comments received regarding the proposed \$100,000 maximum.

Thank you for your consideration of this issue.



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

To: Commission Members
From: Jonathan Wayne, Executive Director
Date: November 17, 2008
Re: Proposed Rulemaking regarding Seed Money for Gubernatorial Candidates

At your July meeting, the Commission decided to accept public comment on a proposed rule change that would allow gubernatorial candidates seeking Maine Clean Election Act (MCEA) funding to raise up to \$100,000 in seed money contributions, rather than the current maximum of \$50,000. After receiving public comment in September, you decided at your October 27 meeting to accept public comment on a proposed increase to \$150,000. The Commission staff has scheduled a public hearing on this proposed change for your November 24 meeting.

The staff continues to believe that raising the maximum to \$150,000 is worth considering because it will enhance the MCEA as an attractive alternative to private fundraising for serious gubernatorial candidates who may be concerned about how they would finance their campaign before they qualify to receive public financing. One factor in our thinking is the private fundraising by the 2002 and 2006 gubernatorial campaigns of John E. Baldacci and Peter E. Cianchette. Unfortunately, the chart of cumulative contributions and expenditures for those campaigns that I provided you for your October 27 2007 meeting was incomplete, due to a miscommunication with a colleague who prepared the chart.

I have attached a corrected chart of cumulative fundraising and spending by those campaigns. The chart re-confirms that all three campaigns had raised well in excess of \$100,000 by April of the election year, when Maine Clean Election Act funding typically becomes available to candidates in a political party:

	Total Receipts through April of the Election Year
John E. Baldacci (2002)	\$626,776
Peter E. Cianchette (2002)	\$362,175
John E. Baldacci (2006)	\$384,327

Thank you for your willingness to accept further public comment on this issue.

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94-270

COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES

Chapter 3: MAINE CLEAN ELECTION ACT AND RELATED PROVISIONS

SECTION 2(3) . Seed Money Restrictions

- A. **General.** After becoming a candidate and before certification, a participating candidate may collect and spend only seed money contributions. The restrictions on seed money contributions apply to both cash and in-kind contributions.
- B. **Total Amount**
- (1) A participating candidate must limit the candidate's total seed money contributions to the following amounts:
 - (a) One hundred fifty thousand dollars for a gubernatorial candidate;
 - (b) one thousand five hundred dollars for a candidate for the State Senate; or
 - (c) five hundred dollars for a candidate for the State House of Representatives.
 - (2) Notwithstanding any other provision of this chapter, a candidate may carry forward to a new candidacy of that candidate campaign equipment or property, subject to the reporting requirements of Title 21-A, chapter 13 [Campaign Reports and Finances].
 - (3) The Commission periodically will review these limitations and, through rulemaking, revise these amounts to ensure effective implementation of the Act.

...

Month	Monthly Receipts	Cumulative Total Receipts	Monthly Expenditures	Cumulative Total Expenditures
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John E. Baldacci's 2002 Campaign

December 2000	\$3,325.00	\$3,325.00	\$0.00	\$0.00
January 2001	\$0.00	\$3,325.00	\$0.00	\$0.00
February 2001	\$0.00	\$3,325.00	\$0.00	\$0.00
March 2001	\$0.00	\$3,325.00	\$0.00	\$0.00
April 2001	\$11,650.00	\$14,975.00	\$62.85	\$62.85
May 2001	\$23,950.00	\$38,925.00	\$6,830.60	\$6,893.45
June 2001	\$121,500.00	\$160,425.00	\$12,359.26	\$19,252.71
July 2001	\$31,783.97	\$192,208.97	\$13,747.07	\$32,999.78
August 2001	\$17,150.00	\$209,358.97	\$16,370.08	\$49,369.86
September 2001	\$15,345.00	\$224,703.97	\$24,509.19	\$73,879.05
October 2001	\$87,735.00	\$312,438.97	\$26,476.61	\$100,355.66
November 2001	\$62,615.00	\$375,053.97	\$25,020.84	\$125,376.50
December 2001	\$114,630.00	\$489,683.97	\$10,530.74	\$135,907.24
January 2002	\$22,792.42	\$512,476.39	\$72,072.01	\$207,979.25
February 2002	\$20,950.00	\$533,426.39	\$22,889.91	\$230,869.16
March 2002	\$56,410.00	\$589,836.39	\$26,597.12	\$257,466.28
April 2002	\$36,939.19	\$626,775.58	\$42,564.80	\$300,031.08
May 2002	\$84,507.96	\$711,283.54	\$370,879.42	\$670,910.50
June 2002	\$141,285.00	\$852,568.54	\$106,365.01	\$777,275.51
July 2002	\$73,184.00	\$925,752.54	\$45,057.63	\$822,333.14
August 2002	\$107,414.21	\$1,033,166.75	\$73,790.00	\$896,123.14
September 2002	\$121,066.00	\$1,154,232.75	\$210,564.63	\$1,106,687.77
October 2002	\$319,153.00	\$1,473,385.75	\$326,346.90	\$1,433,034.67
November 2002	\$87,274.99	\$1,560,660.74	\$125,091.48	\$1,558,126.15
December 2002	\$27,425.00	\$1,588,085.74	\$31,962.96	\$1,590,089.11
January 2003	\$9,309.42	\$1,597,395.16	\$5,592.83	\$1,595,681.94
February 2003	\$0.00	\$1,597,395.16	\$1,481.98	\$1,597,163.92
March 2003	\$0.00	\$1,597,395.16	-\$5,674.94	\$1,591,488.98
April 2003	\$0.00	\$1,597,395.16	\$35.00	\$1,591,523.98
May 2003	\$0.00	\$1,597,395.16	-\$2,966.12	\$1,588,557.86
June 2003	\$0.00	\$1,597,395.16	\$11,474.48	\$1,600,032.34

Month	Monthly Receipts	Cumulative Total Receipts	Monthly Expenditures	Cumulative Total Expenditures
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Peter E. Cianchette's 2002 Campaign

December 2000	\$225.00	\$225.00	\$0.00	\$0.00
January 2001	\$0.00	\$225.00	\$0.00	\$0.00
February 2001	\$0.00	\$225.00	\$0.00	\$0.00
March 2001	\$0.00	\$225.00	\$0.00	\$0.00
April 2001	\$0.00	\$225.00	\$0.00	\$0.00
May 2001	\$1,500.00	\$1,725.00	\$40.00	\$40.00
June 2001	\$50,625.00	\$52,350.00	\$1,788.28	\$1,828.28
July 2001	\$10,075.00	\$62,425.00	\$18,352.80	\$20,181.08
August 2001	\$4,250.00	\$66,675.00	\$19,460.69	\$39,641.77
September 2001	\$19,025.00	\$85,700.00	\$14,768.06	\$54,409.83
October 2001	\$28,300.00	\$114,000.00	\$18,907.61	\$73,317.44
November 2001	\$38,980.00	\$152,980.00	\$16,638.35	\$89,955.79
December 2001	\$89,600.00	\$242,580.00	\$16,778.29	\$106,734.08
January 2002	\$11,850.00	\$254,430.00	\$19,581.53	\$126,315.61
February 2002	\$23,945.00	\$278,375.00	\$22,771.58	\$149,087.19
March 2002	\$33,025.00	\$311,400.00	\$97,356.36	\$246,443.55
April 2002	\$50,775.00	\$362,175.00	\$63,704.05	\$310,147.60
May 2002	\$89,985.00	\$452,160.00	\$124,689.11	\$434,836.71
June 2002	\$112,285.00	\$564,445.00	\$98,259.43	\$533,096.14
July 2002	\$121,424.24	\$685,869.24	\$34,875.28	\$567,971.42
August 2002	\$104,650.00	\$790,519.24	\$118,807.20	\$686,778.62
September 2002	\$174,538.00	\$965,057.24	\$238,491.06	\$925,269.68
October 2002	\$289,418.50	\$1,254,475.74	\$279,736.62	\$1,205,006.30
November 2002	\$26,340.00	\$1,280,815.74	\$25,193.37	\$1,230,199.67
December 2002	\$635.00	\$1,281,450.74	\$26,807.33	\$1,257,007.00
January 2003	\$0.00	\$1,281,450.74	\$4,701.93	\$1,261,708.93
February 2003	\$3,625.00	\$1,285,075.74	\$514.95	\$1,262,223.88
March 2003	\$3,275.00	\$1,288,350.74	\$4,692.73	\$1,266,916.61
April 2003	\$450.00	\$1,288,800.74	\$2,885.21	\$1,269,801.82
May 2003	\$350.00	\$1,289,150.74	\$3,107.45	\$1,272,909.27
June 2003	\$0.00	\$1,289,150.74	\$60.70	\$1,272,969.97
July 2003	\$6,815.00	\$1,295,965.74	\$275.75	\$1,273,245.72
August 2003	\$1,300.00	\$1,297,265.74	\$150.75	\$1,273,396.47
September 2003	\$250.00	\$1,297,515.74	\$40.00	\$1,273,436.47
October 2003	\$0.00	\$1,297,515.74	\$68.35	\$1,273,504.82
November 2003	\$0.00	\$1,297,515.74	\$85.00	\$1,273,589.82
December 2003	\$0.00	\$1,297,515.74	\$0.00	\$1,273,589.82
January 2004	\$0.00	\$1,297,515.74	\$0.00	\$1,273,589.82
February 2004	\$0.00	\$1,297,515.74	\$0.00	\$1,273,589.82
March 2004	\$0.00	\$1,297,515.74	\$7,268.20	\$1,280,858.02
April 2004	\$0.00	\$1,297,515.74	\$0.00	\$1,280,858.02
May 2004	\$0.00	\$1,297,515.74	\$0.00	\$1,280,858.02
June 2004	\$0.00	\$1,297,515.74	\$16,657.72	\$1,297,515.74

Month	Monthly Receipts	Cumulative Total Receipts	Monthly Expenditures	Cumulative Total Expenditures
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John E. Baldacci's 2006 Campaign

October 2005	\$29,850.00	\$29,850.00	\$8,071.18	\$8,071.18
November 2005	\$60,251.00	\$90,101.00	\$25,113.28	\$33,184.46
December 2005	\$109,465.00	\$199,566.00	\$23,768.76	\$56,953.22
January 2006	\$20,935.00	\$220,501.00	\$38,364.81	\$95,318.03
February 2006	\$1,000.00	\$221,501.00	\$27,930.00	\$123,248.03
March 2006	\$24,400.00	\$245,901.00	\$49,202.18	\$172,450.21
April 2006	\$138,426.00	\$384,327.00	\$89,463.11	\$261,913.32
May 2006	\$168,213.87	\$552,540.87	\$262,490.42	\$524,403.74
June 2006	\$117,711.00	\$670,251.87	\$156,304.54	\$680,708.28
July 2006	\$101,787.62	\$772,039.49	\$66,632.00	\$747,340.28
August 2006	\$145,710.08	\$917,749.57	\$95,938.54	\$843,278.82
September 2006	\$135,005.00	\$1,052,754.57	\$183,183.73	\$1,026,462.55
October 2006	\$226,119.12	\$1,278,873.69	\$218,700.17	\$1,245,162.72
November 2006	\$26,630.00	\$1,305,503.69	\$57,489.80	\$1,302,652.52
December 2006	\$4,769.00	\$1,310,272.69	\$4,613.95	\$1,307,266.47
January 2007	\$0.00	\$1,310,272.69	\$2,951.14	\$1,310,217.61
February 2007	\$315.00	\$1,310,587.69	\$4.54	\$1,310,222.15
March 2007	\$0.00	\$1,310,587.69	\$10.51	\$1,310,232.66
April 2007	\$0.00	\$1,310,587.69	\$9.94	\$1,310,242.60
May 2007	\$0.00	\$1,310,587.69	\$10.18	\$1,310,252.78
June 2007	\$200.00	\$1,310,787.69	\$204.84	\$1,310,457.62
July 2007	\$0.00	\$1,310,787.69	\$10.16	\$1,310,467.78
August 2007	\$0.00	\$1,310,787.69	\$9.87	\$1,310,477.65
September 2007	\$600.00	\$1,311,387.69	\$9.89	\$1,310,487.54
October 2007	\$300.00	\$1,311,687.69	\$1,160.45	\$1,311,647.99
November 2007	\$0.00	\$1,311,687.69	\$9.57	\$1,311,657.56
December 2007	\$100.00	\$1,311,787.69	\$9.97	\$1,311,667.53
January 2008	\$0.00	\$1,311,787.69	\$10.22	\$1,311,677.75
February 2008	\$100.00	\$1,311,887.69	\$9.88	\$1,311,687.63
March 2008	\$100.00	\$1,311,987.69	\$260.02	\$1,311,947.65
April 2008	\$0.00	\$1,311,987.69	\$10.16	\$1,311,957.81
May 2008	\$0.00	\$1,311,987.69	\$9.97	\$1,311,967.78
June 2008	\$0.00	\$1,311,987.69	\$9.99	\$1,311,977.77

21-A §1125. Terms of participation

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21-A §1125. Terms of participation

1. Declaration of intent. A participating candidate must file a declaration of intent to seek certification as a Maine Clean Election Act candidate and to comply with the requirements of this chapter. The declaration of intent must be filed with the commission prior to or during the qualifying period, except as provided in subsection 11, according to forms and procedures developed by the commission. A participating candidate must submit a declaration of intent within 5 business days of collecting qualifying contributions under this chapter. Qualifying contributions collected before the declaration of intent has been filed will not be counted toward the eligibility requirement in subsection 3.

[2007, c. 443, Pt. B, §6 (AMD) .]

2. Contribution limits for participating candidates. Subsequent to becoming a candidate as defined by section 1, subsection 5 and prior to certification, a participating candidate may not accept contributions, except for seed money contributions. A participating candidate must limit the candidate's total seed money contributions to the following amounts:

- A. Fifty thousand dollars for a gubernatorial candidate; [1995, c. 1, §17 (NEW).]
- B. One thousand five hundred dollars for a candidate for the State Senate; or [1995, c. 1, §17 (NEW) .]
- C. Five hundred dollars for a candidate for the State House of Representatives. [1995, c. 1, §17 (NEW) .]

The commission may, by rule, revise these amounts to ensure the effective implementation of this chapter.

[2007, c. 443, Pt. B, §6 (AMD) .]

2-A. Seed money restrictions. To be eligible for certification, a participating candidate may collect and spend only seed money contributions subsequent to becoming a candidate and prior to certification. A participating candidate may not solicit, accept or collect seed money contributions after certification as a Maine Clean Election Act candidate.

- A. All goods and services received prior to certification must be paid for with seed money contributions, except for goods and services that are excluded from the definition of contribution in section 1012, subsection 2, paragraph B. It is a violation of this chapter for a participating candidate to use fund revenues received after certification to pay for goods and services received prior to certification. [2007, c. 443, Pt. B, §6 (NEW) .]
- B. Prior to certification, a participating candidate may obligate an amount greater than the seed money collected, but may only receive that portion of goods and services that has been paid for or will be paid



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

To: Jonathan Wayne

From: Cyndi Philips

Date: November 26, 2008

Re: Summary of Comments regarding Seed Money for gubernatorial Candidates

At the Commission's November 24 public hearing on the proposed \$150,000 seed money maximum for gubernatorial candidates, the Commission received oral testimony from Alison Smith, Co-Chair of the Maine Citizens for Clean Elections (MCCE), and from Joseph Greenier.

Summary of Comments by Alison Smith

The MCCE does not object to the proposed higher limit of \$150,000 because it will attract the strongest candidates to the program. The MCCE makes four points with regard to tripling the seed money cap:

- out-of-state contributions should be limited;
- the rolling over of seed money into public campaign funding should not be allowed;
- a comparison between the actual fundraising and spending by past privately financed candidates and publicly funded candidates may not be valuable; and
- the proposed Fair Elections Now Act, which is based on the Maine Clean Election Act, would provide public financing to Congressional candidates. It contains a lower seed money maximum for candidates seeking public financing in Maine: a base of \$75,000 plus \$7,500 for each of the two congressional districts within the state.

Summary of Comments by Joseph Greenier

Joseph Greenier of Stockton Springs is opposed to increasing the cap to \$150,000 in the interest of keeping public funding costs down. The more money given to candidates, the more matching funds will rise. Also, public money should stay within the State of Maine and not be paid to vendors from other states.

94-270 **COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES**

Chapter 3: MAINE CLEAN ELECTION ACT AND RELATED PROVISIONS

SECTION 2(3). Seed Money Restrictions

- A. **General.** After becoming a candidate and before certification, a participating candidate may collect and spend only seed money contributions. The restrictions on seed money contributions apply to both cash and in-kind contributions.
- B. **Total Amount**
- (1) A participating candidate must limit the candidate's total seed money contributions to the following amounts:
- (a) One hundred ~~five~~ thousand dollars for a gubernatorial candidate;
- (b) one thousand five hundred dollars for a candidate for the State Senate; or
- (c) five hundred dollars for a candidate for the State House of Representatives.
- (2) Notwithstanding any other provision of this chapter, a candidate may carry forward to a new candidacy of that candidate campaign equipment or property, subject to the reporting requirements of Title 21-A, chapter 13 [Campaign Reports and Finances].
- (3) The Commission periodically will review these limitations and, through rulemaking, revise these amounts to ensure effective implementation of the Act.

...



Beth Edmonds
President of the Senate
3 State House Station
Augusta, ME 04333-0003
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SEP 26 2008

MAINE ETHICS COMMISSION

September 24, 2008

Jonathan Wayne
Executive Director
Commission on Governmental Ethics and Election Practices
132 Statehouse Station
Augusta, ME 04333-0135

Re: Seed Money Contributions for Gubernatorial Candidates

Dear Mr. Wayne:

Thank you for your memo of September 3, 2008 inviting comment on proposed rule amendments regarding seed money contributions for gubernatorial candidates. I appreciate the Commission's interest in this subject and welcome the opportunity to share my thoughts.

Maine Clean Elections Act

I was among those who initially supported and fought for adoption of the Maine Clean Elections Act. Our goal was to improve Maine's electoral system by making it possible for candidates to seek public office without having to raise private funds. To date, the Act has been very successful in legislative races, but has a mixed record in gubernatorial races.

Significantly, the incumbent Governor chose not to run under the Act during his bid for re-election in 2006. That is a complex decision and I do not mean to imply any criticism of his choice. I do, however, want to see the Act implemented in such a way that gubernatorial candidates can both participate in the Act and run competitive campaigns. *I strongly believe the proposed rule before you is a positive step in that direction and should be adopted.*

Jonathan Wayne
September 24, 2008
Page 2

Funding for Gubernatorial Campaigns

Under current rules, Maine Clean Election Act candidates for Governor are entitled to four separate and distinct sources of funding. First, they may raise seed money up to the limit set by the Commission, currently \$50,000. This proposal would raise that figure to \$100,000. Doing so will test a candidate's viability and support and allow him or her to better prepare for the campaign. Also, the additional seed money will assist candidates in gathering the 3,250 qualifying contributions necessary to participate in the Act.

Second, if they are in a competitive primary they will receive \$200,000 in funding for the primary campaign. Third, they will receive \$600,000 for the general election campaign. Clearly, the extra \$50,000 this rule change would make available is not enough to make or break a campaign, but it will provide additional resources at the start of the campaign, when they are most helpful. It would reward the most organized and prepared candidates. That is a good thing, because it is also a measure of their ability to govern if elected.

Finally, candidates are eligible for matching money, up to two times the amount of the initial fund distribution, when third party expenditures are made on behalf of their opponent(s) during the primary or general elections. Again, the larger amount of seed money allowed by this change would allow organized candidates to prepare to make the best use of any matching funds that appear during the campaign.

In sum, allowing this rule change will strengthen the Maine Clean Elections Act by encouraging participation in the Act and by rewarding the most organized and prepared candidates. The result will be an overall reduction in special interest money and the fairest possible elections.

The Maine Clean Elections Act is a national model. This amendment, by strengthening the Act, will assist Maine in remaining a national leader in election form. Please adopt the proposed rule amendment for seed money contributions to gubernatorial candidates.

Sincerely,

Handwritten signature of Beth Edmonds in black ink, with the initials 'MEH' written at the end of the signature.

Beth Edmonds
President of the Senate

Cc: Joy J. O'Brien, Secretary of the Senate

Maine Citizens for Clean Elections

Handwritten
Item 4
9/29/0

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(207) 664-0696 Ann Luther, Co-chair
(207) 879-7440 Alison Smith, Co-chair
(207) 317-6310 Jill Ward, Program Director

September 29, 2008

To: Maine Commission on Governmental Ethics and Election Practices

Re: **Seed Money Rule Change**

Maine Citizens for Clean Elections (MCCE) supports the proposed increase in the Seed Money cap for gubernatorial candidates.

In the aftermath of the 2006 gubernatorial election, much effort was put into tightening up the Clean Election system to ensure that so-called "fringe" candidates are not able to access public funds for their campaigns. This was an important effort which was fully supported by MCCE.

Important as that was, it is also absolutely critical that the Clean Election option appeal to Maine's strongest, most viable gubernatorial candidates. Having a system that does not attract leading candidates will not allow us to reach the goal of severing the connection between private money and the state's highest office.

As potential gubernatorial candidates contemplate how to finance their campaigns, it is essential that they see that the Clean Election option provides a realistic opportunity to lay the groundwork for a viable statewide race before public funds are available in the spring of 2010. MCCE believes the cap must be raised in order to meet this test.

Seed money is limited private money that candidates may raise early in their candidacy to get their campaign off the ground and successfully fulfill the requirements of the qualifying process. The contribution limit for seed money is \$100 per donor. Corporations and political action committees are barred from making seed money contributions.

Seed money is the only money available to Clean Election candidates between the time they declare for office and prepare to run a statewide race and the time when public funds are distributed in the spring of 2010. For some candidates, this might be a year-long period.

It is appropriate to revisit the \$50,000 cap which was set more than a decade ago when the Maine Clean Election Act (MCEA) was first drafted. The change is in keeping with the higher costs for everything from gasoline to printing, as well as the significantly higher qualifying threshold that 2010 candidates will be asked to meet. Candidates in 2010 will have to collect a minimum of 3,250 Qualifying Contributions – an increase of 30 percent over 2006.

Maine Citizens for Clean Elections is a coalition of groups and individuals that exists to advocate for, increase public support for, defend and improve the Maine Clean Election Act and related campaign finance law. Members include AARP Maine, Common Cause Maine, the League of Women Voters of Maine, League of Young Voters, Maine AFL-CIO, Maine Council of Churches, Maine People's Alliance/Maine People's Resource Center, Maine Women's Lobby, NAACP-Portland, and Peace Action Maine.

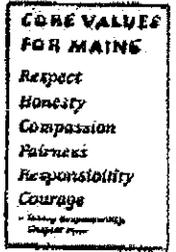
Doubling the cap to \$100,000 is a big jump, and we don't expect that every candidate will raise the full amount. But we see no harm in raising it that high, and it poses no risk of allowing an influx of big special interest money into Clean Election campaigns.

Here is why:

- ✓ The Seed Money contribution limit remains at \$100.
- ✓ At least 1,000 individual supporters would have to donate in order for a candidate to raise the full amount.
- ✓ Only people – not corporations or political action committees (PACs) – may make Seed Money contributions.
- ✓ Raising the cap does not increase the cost of the program, since the money is given voluntarily by individual donors.
- ✓ Candidates will run campaigns on a level playing field, since any unspent Seed Money is deducted from the initial distribution of public funds.

The statute specifically permits the Commission to revise the seed money amounts by rule in order to “ensure the effective implementation of this chapter.” We believe that raising the Seed Money cap will do just that by enhancing the attractiveness of the Clean Election system to the strongest candidates for governor.

We appreciate the Commission undertaking this rule change and fully support its adoption.



104 Muskrat Rd.
Stockton Springs ME 04981
October 14, 2008.

By fax: 207-287-6775

State of Maine
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and Election Practices
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OCT 14 2008

MAINE ETHICS COMMISSION

Subject: Comment on Proposed Rule Amendment

Dear Franklin Jonathan Wayne,

In regards to Proposed Rule Amendment, ch. 3, Section 2(s), we respectfully disagree with raising the total seed money from fifty thousand dollars to one hundred thousand dollars. We believe it goes against the intent of the Maine Clean Elections Act, which is to give money to candidates, so regular people can run for office. By doubling the total seed money, it will have the intent of disadvantaging regular people from running for Governor. We contend that \$50,000 is a lot of money and the lower the amount of seed money, the less chance for undue influence.

We contend that all seed money must come from Maine residents only and within your own district for House and Senate races, and in-state only for Governor's race. If you must get signatures within your own district to get on the ballot, then seed money should be identical.

In order to save taxpayers money, the amount for the House race should be a cap of \$5,000, is sufficient to run for office and maximum of \$15,000 for the Senate race. There also should be identical caps for Publically Funded Candidates. We contend that all Clean Elections money must stay in Maine, because it is taxpayer's money, to help Maine businesses. We are encouraging all previous candidates to reuse signs and campaign materials, to save taxpayers money. All Clean Elections money should be always be spent within the boundaries of Maine; and, if possible and within the boundaries of your district, to protect the taxpayer's money. We should be encouraging all political parties to spend money in-state, to support our Maine candidates by using Maine businesses. This will focus on keeping Maine people employed. Please think about it. ~~We need to~~ be frugal with the taxpayer's money.

Thank you.

Concerned Citizens
Joe + Michele Greenier
and Candidate for Senate District #23
Joseph H. Greenier