



To: Commission
From: Michael Dunn, Esq., Political Committee Registrar
Date: July 21, 2021
Re: Leadership PAC Investigation – Star City PAC

On November 18, 2020, the Commission authorized an enhanced compliance review of fifteen (15) political action committees that, in 2020, were led by Legislators and raised or spent over \$5,000 in the year. The Commission staff sent the Star City PAC (the “PAC”) an initial request for records on 12/08/2020. ETH. 7-8. Those records were received on or before January 31, 2021, and a supplemental request for records was sent on 03/09/2021. ETH. 9. Upon reviewing the information provided by the PAC, the Commission staff found one potential violation and four exceptions. ETH. 3-6.

On 06/07/2021, the Commission staff mailed its preliminary findings to the PAC’s officers requesting comment. ETH. 1-6. The PAC has declined to submit a response. The Commission staff recommends finding one violation but imposing no financial penalty.

LEGAL REQUIREMENTS

Receipt Retention. The treasurer of a PAC shall retain a vendor invoice or receipt stating the particular goods or services purchased for every expenditure in excess of \$50 to initiate or influence a campaign. 21-A M.R.S. § 1057(2).

Reporting Expenditures. A PAC must report all expenditures to initiate or influence a campaign and include the payee, purpose, whether it was to support or oppose a candidate or referendum. 21-A M.R.S. § 1060(4). The PAC must also report operational expenditures that are not made for the purpose of influencing a campaign. 21-A M.R.S. § 1060(4).

ANALYSIS AND STAFF RECOMMENDATION

During the Commission staff's review of the PAC's records, the Commission staff flagged five issues for further review.

Unknown Withdrawal

A PAC must report all expenditures made to support or oppose a campaign and all operational expenses. 21-A M.R.S. § 1060. On 02/20/2020, the PAC withdrew \$250. ETH. 14. This withdrawal does not appear to have been reported and the PAC officers are unsure as to the reason for the withdrawal. ETH. 10-13. After speaking with Sen. Trey Stewart, the PAC believes that it may have been caused by an unintentional overdraft but remains unsure.

The Commission staff's primary concern is that PAC officers could not identify the reason¹ for the withdrawal, what the check was for, or whether the payment had been included in campaign finance reports. The Commission staff recommends finding that the PAC violated 21-A M.R.S. § 1060(7) by not reporting a 2/20/2019 payment of \$250 (or in the alternative, failing to keep records sufficient for the Commission staff to identify the transaction, if it was reported). The Commission staff recommends finding no financial penalty.

Failure to Main Receipts

The treasurer of a PAC shall retain a vendor invoice or receipt stating the particular goods or services purchased for every expenditure in excess of \$50 to initiate or influence a campaign. 21-A M.R.S. § 1057(2). The PAC failed to maintain two receipts:

- A 02/11/2020 receipt to Junction Bowl for \$87.92, and
- A 02/13/2020 receipt to Tradewinds for \$54.96.

The Commission staff recommends that these issues be treated as exceptions and that no financial penalty be imposed.

¹ It is possible that this check was payment to the American Legislative Exchange Council, which the PAC reported with a date of 12/09/2019. Activity during 2019 was outside the scope of the compliance review and the Commission staff has not confirmed this possibility with the PAC.

Duplicate Reporting

On 03/22/2020, the PAC reported reimbursing Sen. Trey Stewart \$319.83 for travel expenses. The PAC, however, had also reported the expenditures that Sen. Stewart was being reimbursed for, meaning that the expenditure was double reported. ETH. 10-13. In the case of reimbursements, the Commission requires that the vendor be reported and not the person being reimbursed. 94-270 C.M.R. Ch. 1 § 7(A). The Commission staff recommends that this duplication be treated as an exception and that no financial penalty be imposed.

The second instance of duplicated reporting resulted from a \$500 contribution from the Energy PAC being reported initially on 10/21/2020 and then again on 10/30/2020. ETH. 18-20. The Commission staff recommends that this issue be treated as an exception and that no financial penalty be imposed.

CONCLUSION

The Commission staff recommends that the Commission find that the PAC violated 21-A M.R.S. § 1060(7) by not reporting a 2/20/2019 payment of \$250 and impose no financial penalty.



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

June 7, 2021

Ms. Emily Smith
Star City PAC
99 Fort Fairfield Road, Suite 1
Presque Isle, ME 04769

Mr. Zach Lingley
Star City PAC
25 Lemont Avenue
South Portland, ME 04106

Re: 2020 Compliance Review of Leadership PACs

Dear Ms. Smith & Mr. Lingley:

Thank you for providing the requested materials for the Star City PAC. I have concluded my review and made my preliminary findings, which are summarized in the enclosed memorandum and materials. Please review the enclosed materials carefully as they will be presented to the Commission.

The purpose of providing these materials to you is to invite you to comment on my preliminary findings. You may provide a written letter along with any supporting documentation that you believe is appropriate. If you believe that certain factual findings are inaccurate, you are welcome to submit information that disputes those findings. You may also wish to correct any errors that you agree with prior to the Commission meeting (if you do so, please let me know in a letter). Please submit any written comments no later than **June 28, 2021**.

After receiving your comments, the Commission staff will submit the enclosed materials, your comments, and, if necessary, a cover memorandum detailing any factual corrections/updates to the Commission. The Commission will consider the Commission staff's findings at the **July 30, 2021** meeting. If the staff's findings indicate that a potential violation was found, then the Committee is encouraged to participate in the meeting. If the findings show only exceptions, then the committee officers are invited to attend at their option. If you wish to attend the **July 30, 2021** meeting but it conflicts with your schedule, please let me know and the review of your PAC may be moved to a later date.

OFFICE LOCATED AT: 45 MEMORIAL CIRCLE, AUGUSTA, MAINE
WEBSITE: WWW.MAINE.GOV/ETHICS

PHONE: (207) 287-4179

FAX: (207) 287-6775

Star City PAC
Page 2
April 9, 2021

I am available to discuss this matter at any time if you have any questions regarding the enclosed materials or the overall process. Thank you for your attention in this matter.

Sincerely,

Michael J. Dunn

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

Enclosures



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

To: Commissioners
From: Michael J. Dunn, Esq., Political Committee Registrar
Date: June 7, 2021
Re: Leadership PAC Review – Star City PAC

I. Overview of Findings

The Commission staff requested the PAC's records on 12/08/2020. The records were provided on or about 02/12/2021.¹ A request for additional records was mailed on 03/08/2021. The additional records were received on or about 03/18/2021. Upon completion of its review, the Commission staff found one potential violation and four exceptions. The Commission staff recommends no further action.

II. History of Committee

Star City PAC registered as a political action committee on 08/16/2017. Senator Trey Stewart was the Principal Officer until 03/26/2020, when Ms. Emily Smith became the Principal Officer.² Mr. Zach Lingley became the Treasurer for the PAC on 03/25/2020. In 2020, the Committee raised \$19,700.00 and spent \$28,589.66.

III. Procedures

In the 12/08/2020 letter, the Commission staff requested the Committee produce the following 2020 records: (1) bank statements; (2) receipts/invoices for all expenditures over \$50; (3) documentation of any new loans or debts; and (4) records from ActBlue/Anedot or similar fundraising services.

After receiving those records, the Commission staff compared the provided records against the reported transactions for incorrect reporting. Specifically, the Commission staff reviewed the records for: omitted or duplicate transactions, failure to itemize

¹ The Commission staff indicated to the Treasurer that a late submission was allowed due to difficulties in obtaining certain documents.

² During 2020, Trey Stewart served as a Representative. He divested himself from the PAC when he ran as an MCEA candidate, ultimately winning a Senate seat.

contributions, prohibited payments, misuse of funds for personal enrichment in violation of 21-A M.R.S. § 1054-B, failure to keep records, improper contributions and other errors.

During its review of Star City PAC, the Commission staff found that additional records would be required. On 03/09/2021, staff sent an email requesting the following:

- an 02/11/2020 receipt to Junction Bowl for \$87.92;
- an 02/13/2020 receipt to Tradewinds for \$54.96;
- additional information regarding a 10/30/2020 contribution from Energy PAC for Maine;
- additional information regarding a 02/20/2020 withdrawal of \$250;
- additional information regarding a 05/05/2020 withdrawal of \$29; and
- the December bank state for the PAC.

The Commission staff received the PAC's response on 03/18/2021.

IV. Potential Violation

After reviewing the records provided on 02/12/2021 and the additional records provided on 03/18/2021, the Commission staff found one discrepancy that would rise to a potential violation of Title 21-A.

On 02/20/2020, the PAC withdrew \$250 for an unknown reason. The PAC is also unsure about this withdrawal and it does not appear to have been reported by the PAC. The PAC believes it may have been caused by an unintentional overdraft but remains unsure.

The Commission staff's primary concern is that there does not appear to be an explanation for this unreported transaction. The staff may recommend that the PAC violated 21-A M.R.S. § 1060(7) by not reporting the February 20, 2020 expenditure of \$250. At this time, the staff does not intend to recommend a penalty for the violation.

The 2020 April Quarterly (the report in which this transaction would have been disclosed) documented significant activity (approximately \$4,000 in expenditures) and the Commission staff does not believe that this single missed transaction would make the report substantially non-conforming. The Commission staff would not recommend a penalty for this violation due to the overall accuracy of reporting by the PAC.

V. Exceptions

After reviewing the records provided on 01/21/2021 and the additional records provided on 03/11/2021, the Commission staff found the following discrepancies that constitute exceptions:

The PAC failed to maintain receipts for two transactions, one at Junction Bowl and one at Tradewinds. The PAC provided transaction statements for the card that was used for these purchases, however, 21-A M.R.S. § 1057, requires that all PACs maintain “vendor invoice(s) and receipt(s)” that are in excess of \$50. The Commission staff considers this to be an exception because the PAC maintained the majority of its receipts and the value of these two receipts is low compared to the total level of the financial activity.

The Commission staff found two incidents of incorrect reporting.

- On 03/22/2020, the PAC reported reimbursing Sen. Trey Stewart \$319.83,³ however, the PAC had also reported the transactions that Rep. Stewart was being reimbursed for; this resulted in duplicating the expenditure. In the case of reimbursements, the Commission requires that the vendor be reported and not the person being reimbursed. 94-270 C.M.R ch. 1 § 7(A).
- The second infraction is a \$500 contribution from the Energy PAC, that was duplicated and was reported on 10/21/2020 and on 10/30/2020.

In the opinion of the Commission staff, these two incidents of incorrect reporting were accidental and there was no intent on the part of the PAC to mislead the public.

Accordingly, the Commission staff believes these qualify as exceptions and recommends no further action.

The PAC also had one instance of a missed transaction. On 05/05/2020, the PAC made an expenditure of \$29. The PAC has determined this was a bank fee but, it was not reported by the PAC. Due to the small amount of activity this infraction represents, the Commission staff believes it to be an exception.

³ The reimbursement is for travel and, in the opinion of staff, is consistent with the allowable reimbursements under 21-A M.R.S § 1054-B, as consider by the Commission on 09/30/2020 (Complaint against Hon. Harold “Trey” Stewart).

VI. Conclusions and Recommendations

Based on the foregoing findings, the Commission staff recommends that no further action be taken. The Commission staff will continue to work with the PAC to file all necessary corrections.

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

December 8, 2020

Ms. Emily Smith
Star City PAC
99 Fort Fairfield Road, Suite 1
Presque Isle, ME 4769

Mr. Zach Lingley
Star City PAC
25 Lemont Avenue
South Portland, ME 4106

Re: 2020 Compliance Review of Leadership PACs

Dear Ms. Smith & Mr. Lingley:

On November 18, 2020, the members of the Ethics Commission directed the Commission staff to begin a compliance review of Leadership PACs that raised or spent more than \$5,000 in 2020. A Leadership PAC is, for purposes of these reviews, a PAC that had an officer that also served as a Legislator in 2020. Based on the Commission's records, the Star City PAC falls into the category for this compliance review.

Please be aware that all committees who meet the above criteria will be reviewed for compliance with PAC laws. By being selected there is no inference on the part of the Commission that any incorrect or improper reporting or activity has taken place. For each PAC reviewed, the Commission staff will prepare and submit to the Commission members a report with the results of the compliance review. You will have the opportunity to review the report and submit any comments that you feel are necessary prior to the Commission's consideration of the staff's report.

In order to facilitate this review, we would appreciate you forwarding copies of the following records:

- All 2020 bank statements for Star City PAC;
- Receipt and/or invoices for all expenditures over \$50 incurred during 2020;
- Documentation of any new loans or debts, or any payments thereof in 2020; and
- Records from ActBlue, Anedot, or similar fundraising service of contributions received in 2020.

OFFICE LOCATED AT: 45 MEMORIAL CIRCLE, AUGUSTA, MAINE
WEBSITE: WWW.MAINE.GOV/ETHICS

PHONE: (207) 287-4179

FAX: (207) 287-6775

The records should be submitted as hard copies, but digital versions would be acceptable in the following formats: .pdf, excel, or .csv. Digital submissions should be sent via email to me (michael.dunn@maine.gov). Please provide the requested records no later than **January 31, 2021**.

Please do not hesitate to contact me if you have any questions regarding this matter.

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

March 9, 2021

Ms. Emily Smith
Star City PAC
99 Fort Fairfield Road, Suite 1
Presque Isle, ME 04769

Mr. Zach Lingley
Star City PAC
25 Lemont Avenue
South Portland, ME 04106

Re: Request for Additional Information – 2020 Compliance Review of Leadership PACs

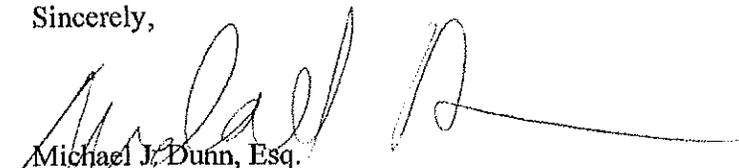
Dear Ms. Smith and Mr. Lingley:

Thank you for submitting the records that I requested in my December 8, 2020 letter. I have had an opportunity to review your submission and am writing with additional questions. Please submit your response at your earliest opportunity but no later than March 23, 2021. Please provide a letter and/or requested documents answering the following:

- On 02/11/2020, the PAC spent \$87.92 at the Junction Bowl. Please provide a copy of the receipt for that transaction.
- On 02/13/2020, the PAC spent \$54.96 at Tradewinds. Please provide a copy of the receipt for that transaction.
- On 10/30/2020, the PAC reporting receiving a contribution from Energy PAC for Maine but there is no associated deposit, I suspect that this entry is a duplicate with an earlier transaction. Please review your records for this transaction.
- On 02/20/2020, there was a withdrawal of \$250. Who was the payee and what was the purpose of this payment?
- On 05/05/2020, there was a withdrawal of \$29. Please indicate the purpose of this withdrawal.
- I am missing the December bank records for 2020. Please provide those at your earliest opportunity.

These requests are being made only to further assist in the Commission's review of the committee. There is no assertion of inaccurate reporting on the part of the Commission or staff. If you have any questions or concerns regarding these requests, I can be reached at (207) 287-4709 or Michael.Dunn@Maine.gov. Thank you for your attention in this matter.

Sincerely,


Michael J. Dunn, Esq.
Political Committee Registrar

OFFICE LOCATED AT: 45 MEMORIAL CIRCLE, AUGUSTA, MAINE
WEBSITE: WWW.MAINE.GOV/ETHICS

PHONE: (207) 287-4179

FAX: (207) 287-6775



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 CAMPAIGN FINANCE REPORT
FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER
Star City PAC PO Box 5341 Augusta, ME 04332 PHONE:(207) 227-0569 EMAIL: ZacharyLingley@gmail.com		Zach Lingley 25 Lemont Ave. South Portland, ME 04106 PHONE: EMAIL: ZacharyLingley@gmail.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)	\$3,150.00	\$3,150.00
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)	\$3,150.00	\$3,150.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$4,289.66	\$4,289.66
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$4,289.66	\$4,289.66
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$36,847.67	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$3,150.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$4,289.66	
12. CASH BALANCE AT END OF PERIOD	\$35,708.01	
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)	\$0.00	

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

REPORT FILED BY: Zach Lingley
 REPORT FILED ON: 4/8/2020 9:25:47 AM
 LAST MODIFIED: 2/10/2021 6:19:56 PM
 COMMITTEE ID: 5648

**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
1/6/2020	Caremark Rx Inc. P.O. Box 287 Lincoln, RI, 02865		3	\$500.00
1/6/2020	Comcast 1702 JFK Boulevard Philadelphia, PA, 19103		3	\$500.00
1/6/2020	MAINE ENERGY MARKETERS ASSOCIATION, ENERGY PAC FOR MAINE 25 GREENWOOD RD PO BOX 249 BRUNSWICK, ME, 04011		5	\$500.00
1/7/2020	Healing Community Medco LLC 40 LISBON ST LEWISTON, ME, 04240		3	\$1,000.00
1/7/2020	Jacob Mitchell P.O. Box 146 Kents Hill, ME, 04349	Mitchell Tardy Jackson Lobbyist	1	\$150.00
1/7/2020	Mitchell Tardy Jackson LLC 104 SEWALL ST AUGUSTA, ME, 04330		3	\$250.00
1/8/2020	MAINE ASSOCIATION OF NURSE ANESTHETIST 345 Fairway Drive Auburn, ME, 04210		5	\$250.00
TOTAL CASH CONTRIBUTIONS				\$3,150.00

**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
1/8/2020	John Andrews PO Box 118 Paris, ME, 04271	Primary contribution.	CON	\$400.00
1/8/2020	Josanne Dolloff 6 Hemingway Road Milton Twp, ME, 04219	Primary and general contribution.	CON	\$800.00
1/18/2020	Delta Air Lines 1030 DELTA BLVD ATLANTA, GA, 30354	Baggage fees, travel to conference	TRV	\$30.00
1/18/2020	Uber 1455 MARKET ST SAN FRANCISCO, CA, 94103	travel at conference	TRV	\$18.08
1/20/2020	Delta Air Lines 1030 DELTA BLVD ATLANTA, GA, 30354	baggage fees travel to conference	TRV	\$30.00
1/20/2020	Portland Airport Parking 962 Westbrook St Portland, ME, 04102	parking at airport	TRV	\$42.00
1/22/2020	GOOGLE DOMAINS, GOOGLE, INC 1600 AMPITHEATRE PARKWAY MOUNTAIN VIEW, CA, 94043	web hosting	WEB	\$6.00
2/10/2020	Portland Pie Company 400 Expedition Dr Scarborough, ME, 04074	Food for meeting	FOD	\$38.87
2/11/2020	Junction Bowl 7 Railroad Avenue Gorham, ME, 04038	Food for meeting	FOD	\$87.92
2/13/2020	Tradewinds 1349 Main Rd Eddington, ME, 04428	Gas for recruitment travel	TRV	\$54.96

2/22/2020	GOOGLE DOMAINS, GOOGLE, INC 1600 AMPITHEATRE PARKWAY MOUNTAIN VIEW, CA, 94043	web hosting	WEB	\$6.00
2/29/2020	York County Republican Committee PO Box 625 Moody, ME, 04054	Lincoln Day Breakfast	FND	\$350.00
3/8/2020	Stephanie Hawke 76 Park Street Boothbay Harbor, ME, 04538	Primary and General Election Contributions	CON	\$800.00
3/8/2020	PENOBSCOT COUNTY REPUBLICAN COMMITTEE 735 NORTH MAIN ST BREWER, ME, 04412	Lincoln Day Dinner	FND	\$250.00
3/8/2020	Wayne R Parry 851 Alfred Road Arundel, ME, 04046	Primary and General Election Contribution	CON	\$800.00
3/20/2020	American Legislative Exchange Council 2900 CRYSTAL DRIVE, 6TH FLOOR ARLINGTON, VA, 22202	Contribution to scholarship fund for legislators	OTH	\$250.00
3/22/2020	GOOGLE DOMAINS, GOOGLE, INC 1600 AMPITHEATRE PARKWAY MOUNTAIN VIEW, CA, 94043	web hosting	WEB	\$6.00
3/22/2020	Harold Stewart, III 312 State Street Presque Isle, ME, 04769	Mileage	TRV	\$319.83
TOTAL OPERATING EXPENDITURES				\$4,289.66

Reimbursement

**PAGES 14-17 REMOVED DUE TO
CONFIDENTIALITY**



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 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
Star City PAC PO Box 5341 Augusta, ME 04332 PHONE:(207) 227-0569 EMAIL: ZacharyLingley@gmail.com		Zach Lingley 25 Lemont Ave. South Portland, ME 04106 PHONE: EMAIL: ZacharyLingley@gmail.com	
REPORT	DUE DATE	REPORTING PERIOD	
42-Day Post-General Election Report	12/15/2020	10/21/2020 - 12/08/2020	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$9,250.00	\$19,700.00
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)	\$9,250.00	\$19,700.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$7,800.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$0.00	\$20,789.66
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$0.00	\$28,589.66
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$18,708.01	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$9,250.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$0.00	
12. CASH BALANCE AT END OF PERIOD	\$27,958.01	
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)	\$0.00	

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

REPORT FILED BY: Zach Lingley
 REPORT FILED ON: 12/14/2020 9:25:20 AM
 LAST MODIFIED: 3/18/2021 2:00:51 PM
 COMMITTEE ID: 5648

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
10/21/2020	ENERGY PAC FOR MAINE PO Box 249 Brunswick, ME, 04011		3	\$500.00
10/29/2020	CMP POLITICAL ACTION COMMITTEE 83 Edison Drive Augusta, ME, 04336	Contribution	5	\$5,000.00
10/29/2020	CMP POLITICAL ACTION COMMITTEE 83 Edison Drive Augusta, ME, 04336	Contribution to Star City PAC	5	\$5,000.00 DELETED 12/15/2020
10/30/2020	ENERGY PAC FOR MAINE P.O. Box 249 Brunswick, ME, 04011	Contribution to Star City PAC	5	\$500.00 DELETED 03/18/2021
10/30/2020	RETAIL LUMBER DEALERS ASSOCIATION OF MAINE PAC 585 North Greenbush Road Rensselaer, NY, 12144	Contribution to Star City PAC	5	\$250.00
11/2/2020	Caremark Rx Inc. P.O. Box 287 Lincoln, RI, 02865	Contribution to Star City PAC	3	\$500.00
11/2/2020	RAI SERVICES COMPANY P.O. Box 464 Winston-Salem, NC, 27102	Contribution to Star City PAC	3	\$500.00
11/2/2020	TransCanada USA Services, Inc. PAC 1250 I Street NW, Suite 225 Washington, DC, 20005	Contribution to Star City PAC	5	\$500.00
11/6/2020	Distilled Spirits Council US 1250 EYE STREET, NW WASHINGTON, DC, 20005	Contribution to Star City PAC	3	\$500.00

Duplicated

Duplicated

11/6/2020	SAZERAC COMPANY, INC. 10400 LINN STATION RD., SUITE 300 LOUISVILLE, KY, 40223	Contribution to Star City PAC	3	\$1,500.00
TOTAL CASH CONTRIBUTIONS				\$9,250.00