

To: Commission

From: Michael Dunn, Esq., Political Committee Registrar

Date: July 21, 2021

Re: Leadership PAC Investigation – Committee for Peace and Justice

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 Committee for Peace and Justice (the "PAC") an initial request for records on 12/08/2020. ETH. 5-6. Those records were received on or before January 31, 2021, and a supplemental request for records was sent on 03/09/2021. ETH. 7. Upon reviewing the information provided by the PAC, the Commission staff found one potential violation and no exceptions. ETH. 3-4. The potential violation is the acceptance of a contribution from a registered lobbyist. 1 M.R.S. § 1015-A.

On 06/07/2021, the Commission staff mailed its preliminary findings to the PAC's officers requesting comment. ETH. 1-4. On June 22, 2021, the Commission received a written response from PAC. ETH. 14. The PAC provided a copy of a check that was sent to the registered lobbyist to reimburse her for the improper contribution. ETH. 14-15. The Commission staff recommends no further action.

LEGAL REQUIREMENTS

Lobbyist Contributions. A Legislator or their staff or agent may not accept a contribution from a lobbyist unless that lobbyist is eligible to vote on the day of the election in a district where that Legislator's name will appear on the ballot. 1 M.R.S. § 1015-A(3). A violation of this section is subject to a civil penalty not to exceed \$1,000. 1 M.R.S. § 1015-A(6).

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

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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 two issues for further review:

- 1. A returned check of \$2,500 that was not reported.
- 2. A \$75 contribution from a registered lobbyist.

Returned \$2,500 check

An expenditure is made when there is a payment, promise of payment, or the transfer of funds by one political entity to another. 21-A M.R.S. § 1052(4). Any one transaction, may trigger the expenditure provisions multiple times (*e.g.* enter into an agreement to pay on one date and then make the payment on a later date), in those cases, the Commission staff has interpreted¹ the law to be that the expenditure is made at the earliest point [most often the agreement (whether it is legally enforceable or not)]. If the obligation occurs in the same report period as a payment for that obligation, then only the expenditure must be reported. 94-270 C.M.R. Ch. 1 § 7(3)(D).

On 10/19/2020, the PAC mailed a check to the House Democratic Campaign Committee, but the account had insufficient funds and the check was shown as returned on the PAC's bank records. ETH. 8. On 10/27/2020, the check was reissued and cleared. ETH. 8. The end of the 11-Day Pre-General Report was on 10/20/2020. Under the statute and regulations, once the check failed to clear, the PAC should have deleted the 10/19/2020 expenditure, entered an obligation on the 11-Day Pre-General Report, and then entered a payment as of 10/27/2020 on the 42-Day Post-General Report.

The Commission staff would generally <u>not</u> instruct a PAC to amend a report in this way based on these facts. Such an amendment would be burdensome on the PAC so close to an election and the amended reports would only serve to confuse the public. For these reasons, the Commission staff considers this issue resolved.

¹ The Commission's regulations provide additional guidance for reporting most transactions.

Improper Lobbyist Contribution

On 10/02/2020, the PAC accepted a contribution from Ms. Christine Hastedt, who is a registered lobbyist for Maine Equal Justice, in violation of 1 M.R.S. § 1015-A(3). ETH. 10. On 06/21/2021, the PAC returned the funds to Ms. Hastedt. ETH. 14-15. The Commission staff recommends that the Commission find a violation but impose no financial penalty.

This prohibition went into effect June 2020 and the PAC's officers did not realize it was a violation when the contribution was accepted in October 2020. (Under the prior law, the contribution would have been allowable because the Legislature was not in session. 1 M.R.S. § 1015 (Repealed)). The value of the contribution was minimal (\$75) and it was publicly reported by the PAC. Once Rep. Brennan was made aware of the violation, he promptly disgorged the funds and copied the Commission on the repayment. ETH. 15. For these reasons, the Commission staff recommends that the Commission find a violation but impose no financial penalty.

CONCLUSION

For theses reasons, the Commission staff recommends that the Commission find that the PAC violated 1 M.R.S. § 1015-A(3) by accepting the \$75 contribution from Ms. Christine Hastedt, a registered lobbyist. The Commission staff recommends imposing no financial penalty for the reasons stated above.



June 7, 2021

Rep. Michael Brennan Committee for Peace and Justice 49 Wellington Road Portland, ME 04103 Ms. Nancy Berrang Committee for Peace and Justice 135 Glenwood Avenue Portland, ME 04103

Re: 2020 Compliance Review of Leadership PACs

Dear Rep. Brennan & Ms. Berrang:

Thank you for providing the requested materials for the Committee for Peace and Justice. 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

Committee for Peace and Justice 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. Durn

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

Enclosures



To: Commissioners

From: Michael J. Dunn, Esq., Political Committee Registrar

Date: June 7, 2021

Re: Leadership PAC Review – Committee for Peace and Justice

I. Overview of Findings

The Commission staff requested the PAC's records on 12/08/2020. The records were provided on or about 01/28/2021. A request for additional records was mailed on 03/08/2021. The additional records were received on or about 03/22/2021. Upon competition of its review, the Commission staff found one potential violation, but no exceptions. The Commission staff recommends the PAC disgorge the funds it improperly received from a registered lobbyist.

II. History of Committee

The Committee for Peace and Justice registered as a political action committee on 08/11/2020. Representative Michael Brennan is the Principal Officer and Ms. Nancy Berrang is the Treasurer. In 2020, the PAC raised \$13,905.00 and spent \$12,679.00.

III. Procedures

In the 12/08/2020 letter, the Commission staff requested the PAC 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 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 the Committee for Peace and Justice, the Commission staff found additional records would be required. On 03/09/2021, the Commission staff sent an email to request additional information regarding a returned check of \$2,500 on 10/26/2020. The staff also requested information from ActBlue. The additional records were provided on 03/22/2021.

IV. Potential Violation

A Leadership PAC may not accept a contribution from a registered lobbyist unless that lobbyist is eligible to vote for the Legislator on election day. 1 M.R.S. § 1015-A(3)(B). On 10/02/2020, the PAC accepted a contribution from Ms. Christine Hastedt, who is a registered lobbyist. Ms. Hastedt's address is listed as Freeport, which is not within Rep. Brennan's district. This new requirement, prohibiting contributions outside of the legislative session, went into effect in June 2020. A penalty for the violation may not exceed \$1,000. 1 M.R.S. § 1015-A(6). The Commission staff does not recommend that a financial penalty be imposed, but that the \$75 contribution be returned to Ms. Hastedt.

V. Exceptions

After reviewing the records provided on 01/28/2021 and the additional records provided on 03/22/2021, the Commission staff did not find any discrepancies that would be considered an exception of Title 21-A.

VI. Conclusions and Recommendations

Based on the foregoing findings, the Commission staff does not recommend any further action, except the return of the improper contribution to Ms. Christine Hastedt.

Thank you for your attention in this matter.



December 8, 2020

Rep. Michael Brennan Committee for Peace and Justice 49 Wellington Road Portland, ME 4103 Ms. Nancy Berrang Committee for Peace and Justice 135 Glenwood Avenue Portland, ME 4103

Re: 2020 Compliance Review of Leadership PACs

Dear Rep. Brennan & Ms. Berrang:

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 Committee for Peace and Justice 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 <u>no inference</u> 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 Committee for Peace and Justice;
- 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.

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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 <u>January 31</u>, <u>2021</u>.

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

Sincerely,

Michael J. Durn

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



March 9, 2021

Hon. Michael Brennan Committee for Peace and Justice 49 Wellington Road Portland, ME 04103 Nancy Berrang Committee for Peace and Justice 135 Glenwood Ave. Portland, ME 04103

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

Dear Rep. Brennan & Ms. Berrang:

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 <u>March 23, 2021</u>. Please provide more information regarding the following:

- On 10/26/2020, your bank account received a credit of \$2,500 for a "Returned Item." My
 assumption is this was a returned check; however, this does not appear to be reported on
 the campaign finance reports for the committee. Please review your filings, if my
 assessment is correct please file the appropriate return and amendment report. Please let
 me know if you disagree with my assessment.
- Please provide the breakdown of fees from ActBlue.

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

From: Nancy Berrang Dunn, Michael Michael Brennan Compliance Review Monday, March 15, 2021 8:16:01 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

Hello Michael,

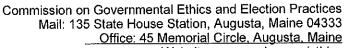
I apologize that you had to follow up with us re: the records we sent for the compliance review of the Committee for Peace and Justice PAC.

Check #192 (\$2,500) was sent to the House Democratic Campaign Committee on October 23, 2021, and then deposited. There were insufficient funds in our account at the time, and the check was returned by the bank. On October 27, the check was re-submitted and subsequently cleared. The October bank statement indicates that check #192 was deposited, returned for insufficient funds, and then re-deposited when those funds were available. We didn't report the returned check or the re-deposit of that check since the effect on cash contributions (line #1 of the financial report) and expenditures (line #5 of the same report) were both unaffected. We will file the amended form if necessary.

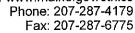
I apologize for not including the breakdown of the fees from ActBlue; I have sent hard copies of that information to you through the mail.

Please let us know if there is anything else you need from us.

Thank you, Nancy Berrang Treasurer Committee for Peace and Justice



Website: www.maine.gov/ethics Phone: 207-287-4179



2020 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE	TREASURER
Committee for Peace and Justice	Ms. Nancy C Berrang
49 Wellington	135 Glenwood Ave
Portland, ME 04103	Portland, ME 04103
PHONE:(207) 939-6462	PHONE:
EMAIL: mfpbrennan@gmail.com	EMAIL: nberrang@gmail.com
REPORT	DUE DATE REPORTING PERIOD
11-Day Pre-General Election Report	10/23/2020 10/01/2020 - 10/20/2020

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$5,730.00	\$8,755.00
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)	\$5,730.00	\$8,755.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$1,600.00	\$1,600.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$6,628.14	\$6,655.19
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$8,228.14	\$8,255.19
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$1,397.95	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$5,730.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$8,228.14	
12. CASH BALANCE AT END OF PERIOD	(\$1,100.19)	
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, Nancy C Berrang, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: PAUL LAVIN on behalf of Nancy C Berrang REPORT FILED ON: 10/21/2020 7:05:51 PM LAST MODIFIED: 12/11/2020 4:21:38 PM COMMITTEE ID: 380270

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	
10/1/2020	Anita Jones 33 OLD MAST ROAD PORTLAND, ME, 04102	self Retired	1	\$50.00	
10/1/2020	Harris Solomon 2665 NE 26 Terrace Fort Lauderdale, FL, 33306-1705	Brinkley Morgan Attorney/Legal	1	\$250.00	
10/1/2020	MEA Fund in Support of Public Education 35 Community Drive Augusta, ME, 04330		4	\$1,000.00	
10/2/2020	Christine Hastedt 83 RINGROSE ROAD FREEPORT, ME, 04032	Maine Equal Justice Policy Analyst	1	\$75.00	Lobbyist Contribution
10/2/2020	Craig Brown 45 Ocean House Road Cape Elizabeth, ME, 04107	Common Dreams Executive Director	1	\$250.00	
10/2/2020	David Berrang 135 Glenwood Avenue Portland, ME, 04103	Westbrook Schools Teacher/Education	1	\$250.00	
10/2/2020	Jim Damicis 88 Stewart Drive Scarborough, ME, 04074	Camoin Associates Consultant	1	\$250.00	
10/2/2020	Libbet Cone 124 Ocean Avenue Portland, ME, 04103	self Healthcare/Medical	1	\$100.00	

	Ina Demers 4 Gorham Road Wiscasset, ME, 04578	Portland Public Schools Teacher/Education	1	\$50.00
	Rameen Armajani 139 Bradley Street Portland, ME, 04102	not employed Not Currently Employed	1	\$150.00
10/6/2020	MaryAnn Gordon 94 CODMAN STREET PORTLAND, ME, 04103	self Family Liaison	1	\$100.00
10/7/2020	Contributors giving \$50 or less	3 contributors of less than \$50 each	12	\$55.00
10/8/2020	Julian Sweet 187 Vaughn Street Portland, ME, 04102	none Retired	1	\$2,000.00
10/8/2020	Thomas Warren 2057 Florida Avenue Tallahassee, FL, 32303	self Attorney/Legal	1	\$250.00
10/9/2020	Catherine Lee 200 MAIN STREET WESTBROOK, ME, 04092	selt Attorney/Legal	1	\$100.00
10/9/2020	Jonathan Cook 70 ALBA STREET PORTLAND, ME, 04103	Gray Family Vision Healthcare/Medical	1	\$100.00
10/13/2020	Ben Dudley 9 Ponce Street Portland, ME, 04101	self Consultant	1	\$250.00
10/13/2020	Mark Millar 13 Torrington Point Peaks Island, ME, 04108	none Retired	1	\$200.00
10/14/2020	Maine Beverage Association 77 Sewall Street Portland, ME, 04330		3	\$250.00
	<u> </u>	TOTAL CASH CONTRIB	UTIONS	\$5,730.00

SCHEDULE B EXPENDITURES TO SUPPORT OR OPPOSE

	EXPENDITURE TYPES						
APP	Apparel (t-s	shirts, hats, embroidery, etc.)	*	CON	Contribution to party con	nmittee, non-profit	, other candidate,
EQP	Equipment etc.)	of \$50 or more (computer, tablet, p	hone, furniture,	EVT	Campaign and fundraising entertainment, supplies,		or booth rental,
FOD	Food for ca	mpaign events or volunteers, cater	ring	HRD	Hardware and small tool	•	lumber, paint, etc.)
LIT	Printed can etc.)	campaign materials (palmcards, signs, stickers, flyers,		MHS	Mail house and direct mostage all included)	• • •	
NEW	Newspaper	r and print media ads only		OFF	Office supplies, rent, util	ities, internet servi	ce, phone minutes
ONL	Social med	dia and online advertising only		"'	and data		
DED	PER Personnel and campaign staff, consulting, and independent contractor costs		ОТН	Other and fees (bank, contribution, and money order fees, etc.)			
PER			РНО	Phones (phone banking	, robocalls and tex	ts)	
POL	Polling and	nd survey research		POS	Postage for U.S. Mail an	nd mail box fees	
PRO	Professional services (graphic design, legal services, web design, etc.)		RAD	Radio ads, production c	osts	•	
ткт	Entrance c	cost to event (bean suppers, fairs, party events, etc.)		TRV	Travel (fuel, mileage, loc	lging, etc.)	
TVN	VN TV/cable ads, production, and media buyer costs only		WEB	Website and internet co- etc.)	sts (website doma	in and registration,	
	TE OF NDITURE	PAYEE		RE	MARK	TYPE	AMOUNT
10/	0/1/2020 Braden Sharpe Campaign o		ontributi	on	CON	\$400.00	

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/1/2020	Braden Sharpe 34 Harlie Woods Rd Durham, ME, 04222	Campaign contribution PAYMENT OF \$400.00 TO SUPPORT: Braden Sharpe Jurisdiction: State. Parly: Democratic. Office: Representative. ELECTION YEAR: 2020.	CON	\$400.00
10/1/2020	Robin Russel 7 St. Louis Avenue Hermon, ME, 04401	campaign contribution PAYMENT OF \$400.00 TO SUPPORT: Robin Russel Jurisdiction: State. Party: Democratic, Office: Representative. ELECTION YEAR: 2020.	CON	\$400.00
10/1/2020	Roland Daniel Martin 431 Martin Road P.O. Box 97 Sinclair, ME, 04779	Campaign contribution PAYMENT OF \$400.00 TO SUPPORT: Bernard R. Martin Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2020.	CON	\$400.00
10/7/2020	Patrick James Scully 102 Country Lake Drive Naples, ME, 04055	campaign contribution PAYMENT OF \$400.00 TO SUPPORT: Patrick James Scully Jurisdiction: State. Party: Unenrolled. Office: Representative. ELECTION YEAR: 2020.	CON	\$400.00
	то	TAL EXPENDITURES TO SUPPORT OR O	PPOSE:	\$1,600.00

SCHEDULE B-1 OPERATING EXPENDITURES

		E>	(PENDIT	URE T	YPES		
APP	Apparel (t-s	t-shirts, hats, embroidery, etc.)		CON	Contribution to party committee, non-profit, other candidate, etc.		
EQP	Equipment etc.)	nt of \$50 or more (computer, tablet, phone, furniture,		EVT	etc. Campaign and fundraising events (venue or booth rental, entertainment, supplies, etc.)		
FOD	Food for ca	mpaign events or volunteers, catering		HRD	Hardware and small to	ools (hammer, nails	, lumber, paint, etc.)
LIT	Printed can etc.)	npaign materials (palmcards, signs, sticl	kers, flyers,	мнѕ	Mail house and direct postage all included)	mail (design, printir	ng, mailing, and
NEW		and print media ads only		OFF	Office supplies, rent, utilities, internet service, phone minutes and data		
ONL		ia and online advertising only		отн		contribution and n	noney order fees, etc.)
PER	Personnel a contractor of	and campaign staff, consulting, and indecosts	ependent	PHO	Phones (phone bankir		
POL	Polling and	survey research		POS	Postage for U.S. Mail	- -	,,,,,
PRO	Professiona design, etc	al services (graphic design, legal service .)	es, web	RAD	Radio ads, production		
TKT		ost to event (bean suppers, fairs, party e	events, etc.)	TRV	Travel (fuel, mileage,	lodging, etc.)	
TVN		ds, production, and media buyer costs o	1413.9		costs (website domain and registration,		
DATE OF PAYEE EXPENDITURE			REMARK		TYPE	AMOUNT	
	10/1/2020 TD Bank Forest Avenue		Maintenance Fees		ОТН	\$13.00	
10/	10/1/2020 ActBlue 366 Summer Street		Fees for A	ctBlue c	ontributions	OTH	\$70.36
10/	/1/2020	Harlan Clarke 15955 LA CANTERA PARKWAY	duplicate check order		ОТН	\$44.78	
10/	SAN ANTONIO, TX, 78256 10/13/2020 MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Fir P.O. Box 5258 Augusta, ME, 04332		rty		CON	\$3,500.00	
10/	19/2020	House Democratic Campaign Committee PO Box 2021 Augusta, ME, 04338	support party commi		mittee	CON	\$2,500.00
10/3	10/20/2020 Chan Creative 25 Rackleff Street Portland, ME, 04103 mailing				MHS	\$500.00	
			TOTA	AL OPI	RATING EXPEN	DITURES	\$6,628.14

Received MW 22 2021 Maine Ethics Commission

MICHAEL BRENMAN 08-20 COMMITTEE FOR PEACE AND JUSTICE 49 WELLINGTON ROAD PORTLAND, ME 04103	195 52-7445/2112 19
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