



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

Commission Meeting 02/28/2022
Agenda Item #2

To: Commissioners
From: Jonathan Wayne, Executive Director
Date: February 16, 2022
Re: Complaint against Dinner Table PAC

On January 19, 2022, Michael G. Hein filed a complaint against The Dinner Table political action committee (“PAC”) asserting that the PAC incorrectly reported five contributions in its quarterly campaign finance report filed on January 18, 2022. During October-December 2021, the PAC was active in raising funds. It reported receiving more than 800 contributions totaling \$68,879, including some contributions from state legislators.

Mr. Hein complains that the report did not accurately report the occupation and place of business for five contributors who are current members of the Maine House of Representatives. The PAC disclosed the five contributors’ places of business and occupations as follows:

Date of first contribution in period	Contributor	Principal Place of Business	Occupation
10/1/2021	William Faulkingham	Self	Commercial Lobsterman
1/21/2021	Shelley Rudnicki	Self Employed	Automotive Industry
12/6/2021	Laurel Libby	Self Employed	Interior Designer
11/18/2021	Josanne Dolloff	N/A	Retired
12/4/2021	Dick Bradstreet	N/A	Retired

Mr. Hein argues that it is incorrect for the PAC to report these contributors as self-employed or retired. Because the contributors are State Representatives, he believes their place of business and occupation should have been listed as State of Maine and Government/Civil. I let Mr. Hein know by email that the Commission staff views these contributions as correctly reported. He requested that this matter be placed on your agenda. The full quarterly report contains 64 pages of contributions. For your reference, directly after this memo we have attached the cover page and 16 pages of contributions in which the PAC listed contributions from legislators

(highlighted). Please note that Mr. Hein is only complaining about contributions from five of the legislators (Representatives Faulkingham, Rudnicki, Libby, Dolloff, and Bradstreet).

LEGAL REQUIREMENTS

PACs and ballot question committees (“BQCs”) are required to file campaign finance reports according to deadlines set in statute. A PAC or BQC is required to itemize each contribution of more than \$50 it has received, including the occupation and place of business of the contributor:

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

6. Identification of contributions. An itemization of each contribution of more than \$50 made to or received by the committee for the purpose of initiating or influencing a campaign, including the name, occupation, places of business and mailing address of each contributor and the amount and date of the contribution
...

21-A M.R.S. § 1060(6). Candidates have the same reporting obligation. 21-A M.R.S. § 1017(5). Party committees have a similar reporting duty, except that the threshold to itemize contributions is \$200. 21-A M.R.S. § 1017-A(1)

The Commission has adopted a rule that acknowledges that collecting all contributors’ addresses, occupations and places of business can be challenging for candidates, PACs, BQCs and parties. Some contributors do not understand why it is necessary to disclose their employment information when making a contribution to a like-minded candidate. Some contributors do not provide their address. The rule requires the candidate or committee to make a “reasonable effort” to ask for the information from the contributor, for example by using text fields in an online fundraising screen or a paper form when soliciting the contribution. If the candidate or committee has requested the information but the contributor has not provided it, the rule allows the candidate/committee to enter a note in the campaign finance report that the candidate/committee requested the information, but the contributor did not provide it.

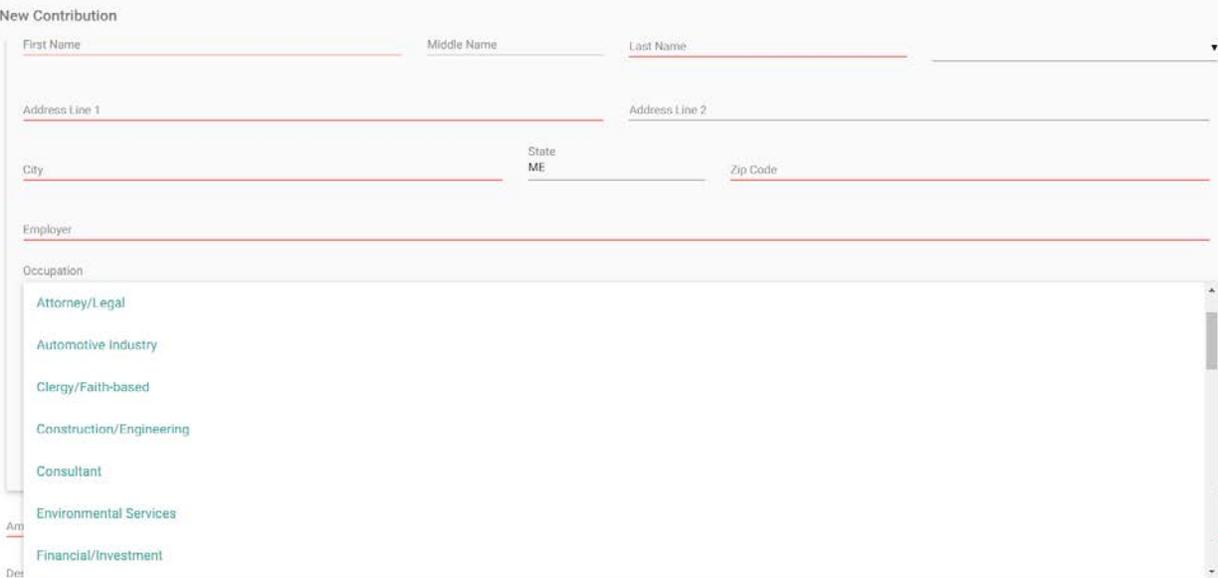
Candidates and political action committees must report the name, address, occupation and employer of each individual contributor who gives, in the aggregate, more than \$50 for the reporting period. . . . Candidates, political action committees, ballot question committees, and party committees must make a reasonable effort to obtain the employment information of the contributor when required by statute. The reasonable effort must include requesting the employment information and providing a convenient means for the donor to provide

the information, such as a paper form to be submitted with a contribution or text fields to enter the information on an online fundraising screen. If a candidate or committee is unable to obtain the information from the contributor in response to a candidate’s or committee’s request, the candidate or committee shall indicate “information requested” in the occupation and employer sections of the campaign finance report. If the Commission staff believes that due to the amount of missing information further inquiry is warranted, the Commission staff shall verify whether the candidate or committee has made a reasonable effort to obtain the information.

Chapter 1, § 6(3), Ethics Commission Rules. PACs (and other campaign finance filers) are required to file their campaign finance reports “through an electronic filing system developed by the commission.” 21-A M.R.S. § 1059(5).

DISCUSSION AND STAFF RECOMMENDATION

Electronic reporting procedures for contributions. When a PAC seeks to enter a contribution from a contributor for the first time, the Commission’s eFiling system invites the PAC to “Create [a] New Contributor,” which asks the PAC to enter the contributor’s name, address, and employment or occupation information. Clicking on the occupation field results in a dropdown list of occupations or fields for the contributor. This regularized system of data entry allows the public to search for contributors who work in a single field, such as “Financial/Investment” or “Government/Civil.” The user may also select “Other” which allows them to enter an occupation not included in the list.



The screenshot displays a web form titled "New Contribution". The form includes several input fields: "First Name", "Middle Name", and "Last Name" (with a dropdown arrow); "Address Line 1" and "Address Line 2"; "City", "State" (with "ME" selected), and "Zip Code"; "Employer"; and "Occupation". The "Occupation" field is expanded, showing a list of options: "Attorney/Legal", "Automotive Industry", "Clergy/Faith-based", "Construction/Engineering", "Consultant", "Environmental Services", and "Financial/Investment". The list is scrollable, with "Am" and "Det" visible at the bottom of the dropdown menu.

Reporting by The Dinner Table PAC

In the attached response to the complaint, The Dinner Table PAC has explained its procedures for reporting its contributions. The majority of the PAC's contributions are received through an online donation service, Anedot, which calls on the contributor to enter their name, address, occupation and employer on screen. The PAC takes that information and enters it into the Commission's campaign finance reporting system.

Overall, the Commission staff believes the contribution reporting by The Dinner Party PAC is quite good compared to some of our other filers. Addresses for all contributors are included. The PAC has entered an occupation place of business for each contributor and is not relying on the "Employment Requested" option.

Application of law. The Commission staff respectfully disagrees with Mr. Hein's interpretation of the reporting requirements. We appreciate that he is taking a pro-disclosure position, but we recommend taking into consideration:

- the precise information that PACs and BQCs are required to report under 21-A M.R.S. § 1060(6), and
- the practicalities for candidates, PACs, ballot question committees and party committees.

Title 21-A, § 1060(6) requires a PAC or BQC to report the contributor's name, address, occupation, and principal place of business. The statute contains no suggestion that the PAC/BQC should disclose the contributor's status as a member of the Maine Legislature.

Service in the Maine Legislature is part-time, as are many other elected offices in Maine. Although Legislators are modestly compensated, many engage in some form of private employment. When PACs receive a contribution from someone who is a Legislator, our interpretation of § 1060(6) has been that PACs should report the *private* occupation and place of business of the contributor, not the contributor's status as a part-time public servant (*e.g.*, State Representative or Town Councilor).

If a legislator such as Rep. Faulkingham or Rep. Libby work *for themselves* as a commercial lobsterman or interior designer, we believe the PAC should report their place of business as "Self Employed." That is the most accurate and descriptive way to report that the contributor works

for themselves. We believe it would be confusing for a PAC to describe the place of business of a self-employed lobsterman as the State of Maine.

As reflected in the Commission's rule, the staff has always presumed that all candidates and committee should be held to the *same* "reasonable effort" standard for collecting and reporting their contributors' addresses, occupations, and places of business. That standard is met if the candidate or committee requests the information from the contributor through an online or paper form. In most cases, the reporting of a contributor should be viewed as satisfactory if the candidate or committee discloses the name, address, occupation, and employer provided by the contributor at the time of the contribution is made. It would be unreasonable to expect candidates and committees to independently research whether a contributor is compensated for a part-time public service position by their State, county, or municipality. That would amount to a burdensome layer of data collection and reporting that is not required under § 1060(6) or the other statutes cited above.

We recommend taking no action on the complaint. 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

2022 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
The Dinner Table PO Box 251 Richmond, ME 04357 PHONE:(207) 240-8157 EMAIL: info@thedinnertablepac.com		Mary Alioto PO Box 251 Richmond, ME 04357 PHONE: EMAIL: richmondmegop@gmail.com	
REPORT	DUE DATE	REPORTING PERIOD	
Committee January Quarterly	01/18/2022	10/01/2021 - 12/31/2021	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$68,879.50	\$147,597.00
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)	\$68,879.50	\$147,597.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$400.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$5,740.46	\$14,897.48
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$5,740.46	\$15,297.48
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$69,160.48	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$68,879.50	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$5,740.46	
12. CASH BALANCE AT END OF PERIOD	\$132,299.52	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$2,074.20	\$2,194.20
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, Mary Alioto, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: Mary Alioto
 REPORT FILED ON: 1/17/2022 1:27:08 PM
 LAST MODIFIED:
 COMMITTEE ID: 391847

10/1/2021	Oksana Bennett 9008 Rocky Lake Ct Sarasota, FL, 34238	NA Retired	1	\$120.00
10/1/2021	Russ Hughes 72 RIDGE RD. RICHMOND, ME, 04357	NA Retired	1	\$100.00
10/1/2021	Sarah Welt 341 Deering Ave. Portland, ME, 04103	NA Homemaker	1	\$2.50
10/1/2021	Wendy Munsell 391 Canton Rd. Livermore, ME, ME, 04253	NA Retired	1	\$10.00
10/1/2021	William Faulkingham 16 Barnacle Ln. Winter Harbor, ME, 04693	Self Employed Commercial Lobsterman	1	\$60.00
10/2/2021	Leanne Heidrich 1175 Pownal Rd. Auburn, ME, 04210	1800 Club Hospitality - Bartender	1	\$25.00
10/2/2021	Lisa York PO Box 33 Dixmont, ME, 04932	Self Employed Personal Assistant	1	\$20.00
10/2/2021	Rick Savage PO Box 209 Bethal, ME, 04217	Self Employed Business owner	1	\$150.00
10/2/2021	Robert Kimball 2702 US Hwy 1 Sullivan, ME, 04664	Self Employed Carpet Cleaner	1	\$10.00
10/2/2021	Tracey Tyler 18 Louise Ave. #1 Lewiston, ME, 04240	Poland Springs Purchaser	1	\$10.00
10/4/2021	Ian Pullen 2 Death Valley Rd. Minot, ME, 04258	Norway Savings Bank Financial/Investment	1	\$240.00
10/4/2021	Matthew McGuire 73 Route 106 Leeds, ME, 04263	Haggerty Realty Real Estate Professional	1	\$240.00
10/5/2021	Caroline Lawrence 258 Ridge Rd. Fairfield, ME, 04937	Caring Hands Owner	1	\$10.00

10/17/2021	Nathan Nickel 3 Howard Rd. Hartford, ME, 04220	Self Employed Analyst	1	\$10.00
10/17/2021	Patrick Corey 353 RIVER RD. WINDHAM, ME, 04062	Self Employed Creative Director	1	\$20.00
10/17/2021	Sarah Nickel 3 Howard Rd. Hartford, ME, 04220	NA Homemaker	1	\$10.00
10/18/2021	Aaron Kregenow 16 Columbia St. Augusta, ME, 04330	Maine Republican Party Regional Field Director	1	\$25.00
10/18/2021	Andrew Stagge 286 Bowman St. Farmingdale, ME, 04344	O&P Glass Glazier	1	\$10.00
10/18/2021	David Boyer 112 Verrill Rd. Poland, ME, 04274	Self Employed Consultant	1	\$10.00
10/18/2021	Derek Cutter 11 Back Cove Dr. Turner, ME, 04282	Veterinary Support Services Facilities Management	1	\$100.00
10/18/2021	Elizabeth Martin 354 Center Minot Hill Rd. Minot, ME, 04258	TD Bank Financial/Investment	1	\$25.00
10/18/2021	Erica Maguire 15 Arbor View Ln. Scarborough, ME, 04074	IDEXX Science/Technology	1	\$50.00
10/18/2021	Lewis Ryan 319 Main Rd. S Hampden, ME, 04444	Omnscom Group Inc. Science/Technology	1	\$30.00
10/18/2021	Samuel Eaton 627 Shaker Hill Rd. Enfield, NH, 03748	Self Employed Marketing	1	\$10.00
10/18/2021	Steve Voter 12 West St. Freeport, ME, 04032	Ecolab Environmental Services	1	\$20.00
10/18/2021	Tom Dupont 14 Birch Ridge Ave. Topsham, ME, 04086	TD Bank Financial/Investment	1	\$120.00

10/18/2021	Valerie Racine 25 South Ave. Lewiston, ME, 04240	TD Bank Financial/Investment	1	\$120.00
10/19/2021	Cynthia Leavitt 39 Breton Ln. Oxford, ME, 04270	TFI Healthcare/Medical	1	\$120.00
10/19/2021	Dylan Mitchell 16 Penobscot Terrace Belfast, ME, 04915	Waldo County General Hospital Environmental Services	1	\$10.00
10/19/2021	Holly Brown 46 Pleasant St. Brunswick, ME, 04011	NA Homemaker	1	\$10.00
10/19/2021	Joseph Parise 41 Haley Rd. Winterport, ME, 04496	NA Retired	1	\$10.00
10/20/2021	Jack Ducharme 34 Heald St. Madison, ME, 04950	State Of Maine Government/Civil	1	\$100.00
10/20/2021	Jack Mitchell 1 Hartford St. Houlton, ME, 04730	NA Retired	1	\$10.00
10/20/2021	Jeffrey Hanson 88 Old Waterville Road Oakland, ME, 04963	Pine State Beverage Electrician	1	\$120.00
10/20/2021	Landon St Peter 48 Old Waterville Road, Oakland, ME, 04963	Fireside Inn Real Estate Professional	1	\$120.00
10/20/2021	Michael Perkins 93 Willey Pt Rd, Oakland, ME, 04963	Self Employed Driving Instructor	1	\$120.00
10/20/2021	Robbie McKay 472 Macwahoc Rd. Molunkus Twp., ME, 04459	Self Employed Writer	1	\$35.00
10/20/2021	Susan Anderson 63 Owl Lane, Auburn, ME, 04210	NA Retired	1	\$20.00

10/21/2021	Sean Hadley 205 Bolton Rd. Dover-Foxcroft, ME, 04426	Self employed Agriculture	1	\$10.00
10/21/2021	Shane King 1616 Bayside Road, Trenton, ME, 04605	Self Employed Automotive Industry	1	\$120.00
10/21/2021	Sharon Beal 1345 US Highway 1A Harrington, ME, 04643	NA Retired	1	\$120.00
10/21/2021	Shelley Rudnicki 211 Norridgewock Rd. Fairfield, ME, 04937	Self Employed Automotive Industry	1	\$20.00
10/21/2021	Sherman Hutchins 49 Bayview Rd. Penobscot, ME, 04476	Wilson Museum Construction/Engineering	1	\$20.00
10/21/2021	Susan Sheremeter 696 Pond Road Gouldsboro, ME, 04607	NA Retired	1	\$10.00
10/21/2021	Sylvia Ong 9 Guptill Point Lane, Winter Harbor, ME, 04693	NA Retired	1	\$240.00
10/21/2021	Trisha White 306 Wharff Rd. Guilford, ME, 04443	Self Employed Retail Sales	1	\$10.00
10/22/2021	Ann Albano 174 Milton Street, PORTLAND, ME, 04103	CVS Healthcare/Medical	1	\$120.00
10/22/2021	Audrey Murphy 4 Pineway Dr. Auburn, ME, 04210	NA Retired	1	\$10.00
10/22/2021	Diana Demmons 353 East Side Road, Sorrento, ME, 04677	Self Employed Storage Business Owner	1	\$120.00
10/22/2021	Gordon Draper 1225 MAIN ST BOWDOIN, ME, 04287	USPS Science/Technology	1	\$10.00
10/22/2021	Janett Olivares 165 South St. Blue Hill, ME, 04614	NA Retired	1	\$10.00

10/25/2021	Greg DeCristofaro 115 Chandler Hill Rd. Bethel, ME, 04217	Homebridge Financial/Investment	1	\$25.00
10/25/2021	Hillary Morely 12 Sequoia Dr. Freeport, ME, 04032	RSU5 Office and Administrative Occupations	1	\$120.00
10/25/2021	Jolene Horning 470 Hardscrabble Rd. Poland, ME, 04274	NA Homemaker	1	\$100.00
10/25/2021	Malcolm Ray 13 Egypt Rd. Damariscotta, ME, 04543	NA Retired	1	\$45.00
10/25/2021	Maryann Clark 220 Wilson District Rd. Harrington, ME, 04643	NA Retired	1	\$10.00
10/25/2021	Samantha Heitov 60 Brook Rd. Portland, ME, 04103	Relogistics Creative Marketing Manager	1	\$25.00
10/26/2021	Lisa York PO Box 33 Dixmont, ME, 04932	Self Employed Personal Assistant	1	\$10.00
10/26/2021	Meldon Carmichael 74 Airport Rd. Old Town, ME, 04468	Carmichael Transport Inc Owner	1	\$100.00
10/26/2021	Rick Mason 273 Lisbon Street, Apt 5 Lisbon, ME, 04250	Self Employed Construction/Engineering	1	\$120.00
10/26/2021	Rob Soulas 2007 Crestdale Dr. Houston, TX, 77080	NA Retired	1	\$120.00
10/27/2021	Basil Stratton 258 Green Rd. Fairfiled, ME, 04937	Family Affair Logging LLC Owner	1	\$10.00
10/27/2021	Contributors giving \$50 or less		12	\$10.00
10/27/2021	Daphney Ford PO Box 34 Howland, ME, 04448	Corner Store Baker	1	\$120.00

11/13/2021	Toni Richardson 220 Northern Ave. Augusta, ME, 04330	NA Not Currently Employed	1	\$120.00
11/14/2021	Larry Traxler 91 North St. Ellsworth, ME, 04605	Self Employed Construction/Engineering	1	\$10.00
11/15/2021	Abigail Griffin 1 Raymond Nelson Ln. Levant, ME, 04456	NA Retired	1	\$120.00
11/15/2021	Andy Kokernak 478 Pond Rd. West Gardiner, ME, 04345	Self Employed Construction/Engineering	1	\$240.00
11/15/2021	Christine Brawn 21 Stage Dr. Hallowell, ME, 04347	EMPLOYMENT INFO REQUESTED	1	\$240.00
11/15/2021	David Merryman 517 Augusta Rd. Topsham, ME, 04086	Self Employed Commercial Lobsterman	1	\$250.00
11/15/2021	Emily Nixon 38 Burgess Rd. Casco, ME, 04015	Beth Bell Homes, Keller Williams Real Estate Professional	1	\$10.00
11/15/2021	Jena Merryman 517 Augusta Rd. Topsham, ME, 04086	Self Employed Property Manager	1	\$240.00
11/15/2021	John McNaughton 28 Mayflower Rd. Hallowell, ME, 04347	Self Employed Real Estate Professional	1	\$240.00
11/15/2021	Matt Johnson 1325 Battle Ridge Rd. Clinton, ME, 04927	FW Webb Sales	1	\$10.00
11/15/2021	Michael Brawn 21 Stage Dr. Hallowell, ME, 04347	EMPLOYMENT INFO REQUESTED	1	\$240.00
11/15/2021	Pamela Mancuso 99 Libby Rd. Litchfield, ME, 04350	Self Employed Commercial Cleaning	1	\$45.00
11/15/2021	Sandra Pullen 579 Kingman Rd. Kingan, ME, 04451	Self Employed Beautician	1	\$120.00

11/18/2021	George Stringer PO Box 1537 Ellsworth, ME, 04605	NA Retired	1	\$120.00
11/18/2021	Heather Miller 663 Upper Garland Rd. Dexter, ME, 04930	NA Homemaker	1	\$25.00
11/18/2021	Josanne Dolloff 6 Hemingway Rd. Milton Township, ME, 04219	NA Retired	1	\$10.00
11/18/2021	Kelly Dayfield 34 Shaw Ln. Hollis, ME, 04042	NA Homemaker	1	\$45.00
11/19/2021	Chris Wade 255 Clark Point Rd. Tremont, ME, 04612	Self Employed Business Owner	1	\$120.00
11/19/2021	Dylan Mitchell 16 Penobscot Terrace Belfast, ME, 04915	Waldo County General Hospital Environmental Services	1	\$10.00
11/19/2021	Holly Brown 46 Pleasant St. Brunswick, ME, 04011	NA Homemaker	1	\$10.00
11/19/2021	Joseph Parise 41 Haley Rd. Winterport, ME, 04496	NA Retired	1	\$10.00
11/19/2021	Tom Trytek 44 Upper Spruce Shore Rd. Harpwell, ME, 04079	Self Employed Gas Contractor	1	\$240.00
11/20/2021	Annique Milite 75 South Freeport Rd. Freeport, ME, 04032	Cuddledown Retail Sales	1	\$190.00
11/20/2021	Barbara Bagshaw 20 Plummer Rd. Windham, ME, 04062	Self Employed Nanny	1	\$120.00
11/20/2021	Cassandra Croteau 8 Mill Pond Dr. Bath, ME, 04530	CIEE Teacher/Education	1	\$250.00
11/20/2021	David Croteau 8 Mill Pond Dr. Bath, ME, 04530	IBEW 104 Real Estate Professional	1	\$250.00

12/3/2021	Kimberly Miller 322 Magrath Rd, Wilton, ME, 04294	Self Employed Writer	1	\$240.00
12/3/2021	Lisa Tremblay 77 Wildes Rd. Bowdoinham, ME, 04008	Self Employed Artist	1	\$10.00
12/3/2021	Matthew Martin 155 Court St, Farmington, ME, 04938	NA Retired	1	\$120.00
12/3/2021	Nicholas Osgood 8 Orange St. 4 Lewiston, ME, 04240	Self Employed Ballot Access	1	\$10.00
12/3/2021	Paula Leavitt 31 Moss Hill Rd. Troy, ME, 04987	NA Retired	1	\$25.00
12/3/2021	William Clardy 13 Maple St. Apt 1 Augusta, ME, 04330	Nth Degree Data Science/Technology	1	\$240.00
12/4/2021	Dick Bradstreet 44 harmony ln. Vassalboro, ME, 04989	NA Retired	1	\$120.00
12/4/2021	Nancy Perry 25 Maple St. Verona Island, ME, 04416	NA Retired	1	\$50.00
12/4/2021	Nick Mullins 22 State St. Suite 1 Bangor, ME, 04401	Self Employed Real Estate Professional	1	\$120.00
12/5/2021	Caroline Lawrence 258 Ridge Rd. Fairfield, ME, 04937	Caring Hands Owner	1	\$10.00
12/5/2021	Contributors giving \$50 or less		12	\$10.00
12/5/2021	Karen Morphew 33 Titcomb Ln. Arundel, ME, 04046	Wentworth Senior Living Healthcare/Medical	1	\$120.00
12/5/2021	Mitchell Brown 46 Pleasant St. Brunswick, ME, 04011	Maine Public Media/Public Relations	1	\$240.00

12/6/2021	Kelly Webb 89 Maple St. Monmouth, ME, 04259	Fontaine Family The Real Estate Leader Retail Sales	1	\$240.00
12/6/2021	Kimberly Hutchinson 46 Weeks Mills Rd. Windsor, ME, 04363	NA Homemaker	1	\$101.00
12/6/2021	Larry Pelletier 484 Ripley Rd. St. Albans, ME, 04971	Dexter School District Teacher/Education	1	\$100.00
12/6/2021	Laurel Libby 442 Park Avenue Auburn, ME, 04210	Self Employed Interior Decorator	1	\$700.00
12/6/2021	Lavena Jordan 7 Barrows Dr. Topsham, ME, 04086	Fresenius Healthcare/Medical	1	\$126.00
12/6/2021	LeAnne MacKenzie 148 Town Farm Rd. Sidney, ME, 04330	Gerald MacKenzie Contractor Construction/Engineering	1	\$91.00
12/6/2021	Linda Engelhardt 45 E Main St. Paris, ME, 04281	Self Employed Real Estate Professional	1	\$20.00
12/6/2021	Linda Waltz-Mountainland 150 Pound Hill Rd. Union, ME, 04862	Self Employed House Cleaner	1	\$50.00
12/6/2021	Marije Nickerson 719 Hadley Mill Rd. Jackson, ME, 04921	NA Homemaker	1	\$70.00
12/6/2021	Mary Woodbury 1007 Alexander Reed Rd. Richmond, ME, 04357	Central Maine Health Healthcare/Medical	1	\$170.00
12/6/2021	Melanie Bray 9 McDonald Ln. Stonington, ME, 04681	Self Employed Healthcare/Medical	1	\$200.00
12/6/2021	Michelle Collomy 72 Hampshire St. Hiram, ME, 04041	NA Homemaker	1	\$30.00
12/6/2021	Michelle Tucker 10 Walker Ave. Lewiston, ME, 04240	Dingley Press Sales	1	\$150.00

12/6/2021	Ronda Snyder 39 Poinsettia Lane Sidney, ME, 04330	Self Employed General Business	1	\$195.00
12/6/2021	Roseanna Young 19 Hemlock Hill Rd. Edgecomb, ME, 04556	83bar Healthcare/Medical	1	\$38.00
12/6/2021	Sally Tedd 108 Fire Rd. 61 China, ME, 04358	Fernald Family Chiropractic Office and Administrative Occupations	1	\$225.00
12/6/2021	Scott Bodwell 183 Wakefield Rd. Hollis, ME, 04042	NA Retired	1	\$10.00
12/6/2021	Seth Lagoy 42 Lagoy Ln. Milo, ME, 04463	Plumblin Carpentry llc Construction/Engineering	1	\$30.00
12/6/2021	Shannon Cutter 11 Back Cove Dr. Turner, ME, 04282	NA Healthcare/Medical	1	\$205.00
12/6/2021	Shelley Rudnicki 211 Norridgewock Rd. Fairfield, ME, 04937	Self Employed Automotive Industry	1	\$120.00
12/6/2021	Spring Gouette 218 Summer St. Auburn, ME, 04210	Self Employed Teacher/Education	1	\$119.00
12/6/2021	Steven Brough 76 Shepherd Dr. Bangor, ME, 04401	Maine Commercial Tire Retail Sales	1	\$135.00
12/6/2021	Terry Buck 25 Mccartney St. Yarmouth, ME, 04096	NA Firefighters/Paramedics	1	\$42.00
12/6/2021	Theresa Grover 55 Lawrence Rd. Gray, ME, 04039	County of Cumberland Accounting	1	\$68.00
12/6/2021	Timothy Gallant 533 Webster St. Lewiston, ME, 04240	NA Retired	1	\$40.00
12/6/2021	Vickie Shane 386 Chicopee Rd. Buxton, ME, 04093	Self Employed Real Estate Professional	1	\$200.00

12/6/2021	Wendy Caffrey 75 Saras Way Bowdoinham, ME, 04008	Mbrace Orthodontics Healthcare/Medical	1	\$10.00
12/6/2021	William Faulkingham 16 Barnacle Ln. Winter Harbor, ME, 04693	Self Employed Commercial Lobsterman	1	\$553.00
12/7/2021	Abigail Griffin 1 Raymond Nelson Ln. Levant, ME, 04456	NA Retired	1	\$35.00
12/7/2021	Amber Hayes 808 Stevens Ave. Portland, ME, 04103	Self Employed Healthcare/Medical	1	\$120.00
12/7/2021	Cheryl Horton 40 Martin Dr. Lewiston, ME, 04240	Self Employed Healthcare/Medical	1	\$80.00
12/7/2021	Cherylann Jerry 11 Intervale Rd. Jay, ME, 04239	Self Employed Healthcare/Medical	1	\$150.00
12/7/2021	Christine Keene 1446 County Rd. Township of Trescott, ME, 04652	NA Not Currently Employed	1	\$60.00
12/7/2021	Contributors giving \$50 or less		12	\$30.00
12/7/2021	Courtney Miles 416 North Rd. Yarmouth, ME, 04096	NA Homemaker	1	\$80.00
12/7/2021	Cynthia Leavitt 39 Breton Ln. Oxford, ME, 04270	TFI Healthcare/Medical	1	\$50.00
12/7/2021	Diana Demmons 353 East Side Road, Sorrento, ME, 04677	Self Employed Storage Business Owner	1	\$40.00
12/7/2021	Donald Mailhot 185 Broad St. Auburn, ME, 04210	Self Employed Retail Sales	1	\$280.00
12/7/2021	Elisabeth Jordan PO Box 830 Kennebunkport, ME, 04046	Keith Lewis Landscaping Landscaper	1	\$200.00

12/14/2021	Randy Hall 1025 RT 2 East Dixfield, ME, 04227	Self Employed Agriculture	1	\$120.00
12/14/2021	Sheila Gavelle 96 LAMBERT HILL STRONG, ME, 04983	NA Homemaker	1	\$10.00
12/15/2021	Emily Nixon 38 Burgess Rd. Casco, ME, 04015	Beth Bell Homes, Keller Williams Real Estate Professional	1	\$10.00
12/15/2021	Matt Johnson 1325 Battle Ridge Rd. Clinton, ME, 04927	FW Webb Sales	1	\$10.00
12/15/2021	Tiffany Moody 7 Atwood St. Lewiston, ME, 04240	Self Employed Consultant	1	\$10.00
12/16/2021	Andre Cushing 123 Maplewood Rd. Newport, ME, 04953	Self Employed Real Estate Professional	1	\$250.00
12/16/2021	CMP POLITICAL ACTION COMMITTEE 83 Edison Drive Augusta, ME, 04336		5	\$500.00
12/16/2021	Eastern Retail Brokerage, LLC 31 Water St. Hallowell, ME, 04347		3	\$250.00
12/16/2021	Jennifer Poirier 78 Palmer Rd. Skowhegan, ME, 04976	Living Innovations Healthcare/Medical	1	\$120.00
12/16/2021	Julie Smith 9 White Birch Drive Readfield, ME, 04355	Self Employed Lobbyist	1	\$100.00
12/16/2021	Sarena Boies 591 Poland Rd. Auburn, ME, 04210	Central Maine Conditioning Clinic Healthcare/Medical	1	\$25.00
12/16/2021	Thomas Martin 25 Lake Shore Dr. Greene, ME, 04236	Self Employed Construction/Engineering	1	\$240.00
12/17/2021	Dylan Mitchell 16 Penobscot Terrace Belfast, ME, 04915	Waldo County General Hospital Environmental Services	1	\$25.00

12/17/2021	Ed Thelander 457 Bristol Rd. Bristol, ME, 04539	NA Retired	1	\$120.00
12/17/2021	Jack Ducharme 34 Heald St. Madison, ME, 04950	State Of Maine Government/Civil	1	\$120.00
12/18/2021	Angie Anderson 127 Rowe Station Rd. New Gloucester, ME, 04260	NA Homemaker	1	\$20.00
12/18/2021	Cheryl Stackhouse PO Box 38 West Baldwin, ME, 04091	NA Retired	1	\$25.00
12/18/2021	David Boyer 112 Verrill Rd. Poland, ME, 04274	Self Employed Consultant	1	\$10.00
12/18/2021	Elizabeth Martin 354 Center Minot Hill Rd. Minot, ME, 04258	TD Bank Financial/Investment	1	\$45.00
12/18/2021	Heidi Dunn 28 Intervale Rd. New Gloucester, ME, 04260	NA Homemaker	1	\$70.00
12/18/2021	Jack Ducharme 34 Heald St. Madison, ME, 04950	State Of Maine Government/Civil	1	\$20.00
12/18/2021	Jeremy Lizzotte 12 JACQUES LN. OAKLAND, ME, 04963	Self Employed Science/Technology	1	\$300.00
12/18/2021	Josanne Dolloff 6 Hemingway Rd. Milton Township, ME, 04219	NA Retired	1	\$10.00
12/18/2021	Randall Greenwood 38 WITHERELL RD. WALES, ME, 04280	State Of Maine Government/Civil	1	\$10.00
12/18/2021	Rick Mason 273 Lisbon Street, Apt 5 Lisbon, ME, 04250	Self Employed Construction/Engineering	1	\$30.00
12/18/2021	Scott Seekins 43 Corrina Rd. Saint, ME, 04971	MCI R Healthcare/Medical	1	\$20.00

12/18/2021	Steven Dunn 32 Shaker Rd. Gray, ME, 04039	Harriman Project Manager	1	\$50.00
12/18/2021	Summer Heath 280 Ford Quint Rd. North Berwick, ME, 03906	Portsmouth Christian Academy Volunteer Advocate	1	\$30.00
12/19/2021	Dan Costain 292 Ridge Rd. Plymouth, ME, 04969	State of Maine Government/Civil	1	\$30.00
12/19/2021	Dylan Mitchell 16 Penobscot Terrace Belfast, ME, 04915	Waldo County General Hospital Environmental Services	1	\$10.00
12/19/2021	Holly Brown 46 Pleasant St. Brunswick, ME, 04011	NA Homemaker	1	\$10.00
12/19/2021	Jeffrey Gifford 346 Frost St. Lincoln, ME, 04457	Self Employed Agriculture	1	\$10.00
12/19/2021	Jennifer Newendyke 160 Small Rd. Litchfield, ME, 04350	Maine Department of Public Safety Office and Administrative Occupations	1	\$240.00
12/19/2021	Joseph Parise 41 Haley Rd. Winterport, ME, 04496	NA Retired	1	\$10.00
12/19/2021	Ryan Otis 18 SALMOND ST. BELFAST, ME, 04915	The Otis Group Incorporated Manager	1	\$100.00
12/20/2021	LeeAnn Delcourt 8258 Carrabassett Rd. Stratton, ME, 04982	Spillover Lodging Owner	1	\$240.00
12/20/2021	Robbie McKay 472 Macwahoc Rd. Molunkus Twp., ME, 04459	Self Employed Writer	1	\$35.00
12/20/2021	Susan Anderson 63 Owl Lane, Auburn, ME, 04210	NA Retired	1	\$10.00

12/23/2021	Jim White 306 Wharff Rd. Guilford, ME, 04443	Self Employed Gunsmith	1	\$50.00
12/23/2021	Joel Vail 59 Doore Road Dover-Foxcroft, ME, 04426	NA Retired	1	\$30.00
12/23/2021	John Andrews PO BOX 118 PARIS, ME, 04271	State of Maine Government/Civil	1	\$30.00
12/23/2021	Josanne Dolloff 6 Hemingway Rd. Milton Township, ME, 04219	NA Retired	1	\$30.00
12/23/2021	Lana Hall 24 Hall Dr. Wales, ME, 04280	Self Employed Doterra/Orbit	1	\$10.00
12/23/2021	Matt Johnson 1325 Battle Ridge Rd. Clinton, ME, 04927	FW Webb Sales	1	\$20.00
12/23/2021	Matthew Weaver 975 Waterille Rd. Waldo, ME, 04915	Weavers Roadside Variety Food Services	1	\$30.00
12/23/2021	Melissa Mills 19 Murch Rd. Freeport, ME, 04032	Stone Coast Cannabis Agriculture	1	\$10.00
12/23/2021	Michael Labelle 81 Main St. Mexico, ME, 04257	NA Retired	1	\$10.00
12/23/2021	Michael Mullins 215 Cedar St. Rockland, ME, 04841	Cranesport, LLC Construction/Engineering	1	\$10.00
12/23/2021	Randy Bent 890 West Main St. Dover-Foxcroft, ME, 04426	Foxcroft Academy Teacher/Education	1	\$20.00
12/23/2021	Ray Philbrook 32 Union St. Dover-Foxcroft, ME, 04426	Self Employed Construction/Engineering	1	\$20.00
12/23/2021	Scott Harding P.O. Box 1393 Greenville, ME, 04441	Self Employed Real Estate Professional	1	\$50.00

12/23/2021	Scott Seekins 43 Corrina Rd. Saint, ME, 04971	MCI R Healthcare/Medical	1	\$20.00
12/23/2021	Sean Hadley 205 Bolton Rd. Dover-Foxcroft, ME, 04426	Self employed Agriculture	1	\$20.00
12/23/2021	Shelley Rudnicki 211 Norridgewock Rd. Fairfield, ME, 04937	Self Employed Automotive Industry	1	\$60.00
12/23/2021	Smokey Bunn 894 W Main St Apt 2 Dover Foxcroft, ME, 04426	Dave's World Retail Sales	1	\$30.00
12/23/2021	Steve Voter 12 West St. Freeport, ME, 04032	Ecolab Environmental Services	1	\$20.00
12/23/2021	Theresa Grover 55 Lawrence Rd. Gray, ME, 04039	County of Cumberland Accounting	1	\$10.00
12/23/2021	Tracie Payor 586 Spruce Head Rd. South Thomaston, ME, 04858	Pursuit Church Custodian	1	\$10.00
12/23/2021	Tricia Richard 132 Gloucester Hill Rd. New Gloucester, ME, 04260	NG Village Store Retail Sales	1	\$20.00
12/23/2021	William Clardy 13 Maple St. Apt 1 Augusta, ME, 04330	Nth Degree Data Science/Technology	1	\$20.00
12/24/2021	Aaron Dudley 18 Stagecoach Rd. Marshfield, ME, 04654	Unity Construction Construction/Engineering	1	\$25.00
12/24/2021	Anne Pepe 9 Sarah Ave. Lewiston, ME, 04240	AHHS Healthcare/Medical	1	\$10.00
12/24/2021	Anne Sarbanis 537 MAIN RD. PHIPPSBURG, ME, 04562	Self Employed Photographer	1	\$10.00
12/24/2021	Ashley Seymour 530 High St. #9 Bath, ME, 04530	NA Homemaker	1	\$30.00

Michael J. Dunn, Esq.
Political Committee and Lobbyist Registrar
Maine Ethics Commission
135 State House Station
Augusta, Maine 04333

January 19, 2022

Attorney Dunn,

I understand this week is a very busy time for you and the Maine Ethics Commission staff, but I do want to register this formal complaint regarding The Dinner Table PAC's most recent finance report, filed this week (provided as an attachment with this correspondence).

Specifically, there are five currently serving legislators listed as donors for this PAC's most recent reporting period (October 2021 to December 2021) with their employer/occupation incorrectly listed as *Retired* or *Self-Employed*. Namely, these legislator/donors are Dolloff, Bradstreet, Faulkingham, Laurel Libby, and Rudnicki.

By contrast, there are nine currently serving legislator/donors (Lemelin, Andrews, Costain, Hanley, Davis, Ducharme, Connor, Greenwood, and Foster) in that The Dinner Table PAC's same finance report, whose employment is listed correctly as *State of Maine, Government/Civil*.

It is important that Dolloff, Bradstreet, Faulkingham, Laurel Libby, and Rudnicki have their employment correctly listed as *State of Maine, Government/Civil* since they are sitting (currently serving) legislators. Laurel Libby, the PAC's principal (and one of the sitting [currently serving] legislators), is aware of the need for the public to be able to readily identify legislators who are contributing her political action committee. It defies belief these omissions are errors of ignorance by The Dinner Table PAC's Treasurer, Mary Alito, who filed the report.

As this is a pressing public interest concern, please consider this signed letter a formal, public complaint. Per 94-270 CMR Ch. 1 Sec. 4(2)(A), please take *further action*, since this is clearly a *minor violation*, namely "...failing to report the employment information for a contributor..."

Thank you in advance for your consideration of this matter.

Sincerely,



Michael G. Hein
Fairfield

From: Mike Hein <michael.g.hein@gmail.com>
Sent: Monday, January 24, 2022 3:33 PM
To: Wayne, Jonathan <Jonathan.Wayne@maine.gov>
Cc: Dunn, Michael <Michael.Dunn@maine.gov>; Currier, Martha <Martha.Currier@maine.gov>
Subject: Re: Question on Complaint

Jonathan,

Thank you for this reply. I hope all is well with both you and Martha. But I find the Commission staff's view on this specific matter to be both contradictory, inconsistent, and not in the interest or to the benefit of the public, in terms of transparency.

That exact same The Dinner Table PAC finance report has *nine currently-serving legislators* who also have multiple employment/income sources, but have been identified appropriately as legislators in the report. Jack Ducharme, for example, is a well-known mortgage broker/writer for Skowhegan Savings Bank and has been for years, but is listed solely as a legislator.

So, if nine legislators (who have more than one income source/employment) *are* listed as legislators and five legislators (who also have more than one income source/employment) *are not* listed as legislators, how can both situations be appropriate within the finance reporting requirements? Either the nine legislators' occupation designation is inappropriate or the five legislators' occupation designation is inappropriate. But both cannot be appropriate.

The Commission staff's view/decision here is inconsistent and confusing. It appears to be a clear violation to not have these 14 legislators *all* listed as legislators for the purposes of PAC finance reporting, due to holding to the public interest standard. Allowing other occupations and employers to be listed is problematic, and potentially deceptive - doing the public a disservice in shielding these PAC donors from being identified as currently-serving/sitting legislators.

Further, at least one of these currently-serving legislators has their occupation listed as "Retired," which fully undercuts the Commission staff's view for listing a full-time employment instead of their part-time legislator occupation. Is it actually the Commission staff's position that even "Retired" is a more appropriate private occupation designation/listing than their *currently-serving legislative occupation*? That's laughable and bizarre.

I would, in fact, like a determination from the full Commission. Surely, the full Commission will be able to provide reasoned guidance and redress the Commission staff's nonsensical view/determination. I will make myself available to speak with you and them both ahead of and on the February 28th public meeting date.

Thank you in advance for facilitating my attendance at this meeting for the purpose of bringing forward this issue to them for resolution.

Sincerely,

Michael Hein
Fairfield

On Mon, Jan 24, 2022 at 2:53 PM Wayne, Jonathan <Jonathan.Wayne@maine.gov> wrote:

Mike,

Thank you for the complaint concerning the Dinner Table PAC. I discussed it with my colleagues and the Commission's attorney.

I'm sorry but the staff of the Ethics Commission intends to take a different view than you concerning the requirements for PACs to report information about their contributors. PACs are required under 21-A M.R.S. § 1060(6) to report the "occupation" and "place of business" of each contributor giving the PAC more than \$50. Our electronic filing system allows for only one place of business and field/occupation to be entered for each contributor.

As you know, serving in the Maine Legislature is part-time. Many Legislators have had a private occupation other than serving in the Legislature. When a Legislator contributes more than \$50 to a PAC, we believe the best way to apply the reporting requirement is to ask the PAC to report their private occupation, not their status as a Legislator.

If you would like to pursue a determination by the Commission that the PAC's January 18, 2022 campaign finance report was incomplete or in violation, I can schedule this for a determination by the members of the Commission at their public meeting on Monday, February 28, 2022. In that case, we would be expecting you to participate in that meeting and would be giving the PAC an opportunity to respond.

Would you like me to do that? Thank you for letting me know either way.

Jonathan Wayne
Executive Director
Maine Commission on Governmental Ethics and Election Practices
135 SHS
Augusta, ME 04333
287-4179



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

Sent by Email and USPS

February 8, 2022

Representative Laurel Libby
Mr. Alex Titcomb, Treasurer
The Dinner Table PAC
PO Box 251
Richmond, ME 04357

Re: Complaint against The Dinner Table PAC

Dear Representative Libby & Mr. Titcomb:

The Maine Ethics Commission received the enclosed request for investigation from Fairfield resident Michael Hein, which alleges that your PAC has incorrectly and intentionally misreported the occupation and employer of several contributors on the 2022 January Quarterly report. The purpose of this letter to provide you an opportunity to respond to this complaint and to provide any information or legal arguments that you believe are relevant.

Commission's Decision Whether to Investigate

The Commission will plan on considering this matter at its next public meeting on February 28, 2022. The Commission staff recommends that you participate in the meeting to respond to the request for investigation and to answer any questions from the Commissioners. The meeting will begin at 9:00 a.m. and you can participate either in person or by Zoom.

Relevant Law

Standard for Initiating an Investigation. The Commission is required to review every request to investigate an alleged violation of campaign finance law and to conduct an "investigation if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred." 21-A M.R.S. § 1003(2).

Content of Reports. PAC reports must include certain information regarding contributions. 21-A M.R.S. § 1060(6) specifically states "An itemization of each contribution of more than \$50 made to or received by the committee for the purpose of

The Dinner Table PAC

Page 2

February 8, 2022

initiating or influencing a campaign, including the name, occupation, places of business and mailing address of each contributor and the amount and date of the contribution.”

Request for Response

Please submit a written response to the request for investigation by Wednesday, February 16, 2022. You are welcome to submit any information or legal argument you believe is relevant to the Commission’s decision whether to investigate. In addition, the Commission staff recommends addressing the following points:

- How does the PAC obtain occupation/employer information?
- Why do some contributions from legislators list their occupation/employer information as that of an elected official, when others do not?

Thank you for your cooperation with this request. I look forward to receiving your response on or before February 16, 2022. Please let me know if you have any questions.

Sincerely,



Martha Currier

Assistant Director

The Dinner Table
PO BOX 251
Richmond, ME 04357
info@thedinnertablepac.com
207-240-8157

Martha Currier
Maine Ethics Commission
135 State House Station
Augusta, ME 04333

February 15, 2022

RE: Response to Feb. 8th letter regarding the Complaint filed against The Dinner Table PAC by Mr. Hein

Dear Martha Currier and To Whom It May Concern,

Thank you for making us aware of this complaint and inviting our response. Both our treasurer, Mary Alioto, and I have had conversations with Michael Dunn about this issue before his departure from the department. (Your letter has me listed as the PAC's treasurer. I humbly ask you to correct that minor error and include Mrs. Mary Alioto, the PAC's treasurer, in any future communications as well.)

Regrettably, I will not be able to attend the Ethics Commission Meeting on Monday, February 28th as I will be traveling back to Maine from a conference. I will do my very best to attend via Zoom if at all possible, during my flight layover. Representative Laurel Libby, who is also listed on the Political Action Committee, will be in attendance to answer any questions as necessary. Please provide me with the zoom login details if this issue goes before the Commission.

My response to this complaint is in line with the conversations Mrs. Alioto, Mr. Dunn, and I have had, that this complaint is frivolous and there should not be any further action by the Ethics Commission. The Dinner Table PAC is upholding the law in reporting our contributions and expenses with the proper details, and consistently doing our due diligence to fulfill all legal requirements.

It is interesting to note that the complaint only highlighted five legislator contributions, and only in the most recent filing. I do not have an answer to why only these five individuals were highlighted. Upon review of our ethics reports you will find other current legislators whose Employer and Occupation are not listed as State of Maine / Government & Civil. The reason for the difference in filing is because Mrs. Alioto submits what the donors themselves provide for their own Employer and Occupation. So, these five individuals (Bradstreet, Dolloff, Faulkingham, Libby, Rudnicki), as well as the other current legislators, provided their Employer and Occupation details to us as they are reported on the report. The same is true with all other transactions. One outlier is Representative Jack Ducharme, who has contributed several times. What is listed on the ethics report is what he submitted on his first transaction and on every transaction but one where he listed his full time Employer and Occupation. Due to the fact that the ethics portal saves donor records, that one transaction still shows the State of Maine / Civil & Government. (Attached with this report is the one exemption.)

Also pertinent to this complaint, I would like to highlight that as Maine has a part time citizen legislature, most legislators also have full time careers outside their public service. I would argue that listing the information for their full-time career provides greater transparency about the financial contribution to the PAC than if their Employer is listed as the State of Maine. Below you will find your response to the

questions you have posed.

Simply put, Mrs. Alioto enters into the ethics database exactly what is submitted to us by the individual donor for their information. Our process for obtaining this information is as follows. Thus far 63% of our contributions have been made through our online donation processing system (Anedot) which has all the fields for the required ethics details as REQUIRED. Each donor is responsible to fill out this information and then Mrs. Alioto enters it into the Ethics Portal. (See attached transaction records for the five legislators in question to this response.) For the remaining 37% of contributions that are made by Check or Cash we have two systems for obtaining the required information for each transaction. First, our remittance envelope (photograph attached). As you see, all the required information we need is on the envelope for the donor to fill in and we strongly stress that each donor fill it out fully and accurately. Second, we have a Google Form asking for the information we need. We send this link to any donors who did not include the required information, and ask them to complete the form to provide the information needed for Mrs. Alioto to use for the ethics filing. (I have attached as an example Representative Sue Bernard's Google Form entry. She is not listed in the complaint, but has indicated her Employer and Occupation as different from State of Maine & Government / Civil.)

If for some reason we are not able to get the donor to fill out their information in writing, we then reach out via telephone to obtain this information. Our standard practice and ideal is to ask the donor to put in writing their own information for us to then use on ethics filing. On a rare occasion, when trying to track down the last few transactions prior to a deadline we may use information provided over the phone.

The question I posed to Mr. Dunn, when I heard about this complaint, was "Are we supposed to call and interrogate every donor about the Employer and Occupation details that they submit to us?" I believe that would be ridiculous. Mr. Dunn agreed. Should we assume or fill in the information based on what we know of the donor, rather than using the information that they have themselves provided? I say that would be a poor practice.

Here at The Dinner Table PAC, we uphold the requirements and obtain this information directly from each individual donor. With over 2,000 individual donations from over 1,000 individual donors our reports are far more transparent and filled out with very little missing information when compared to all the other political action committees focused on State Legislature races.

Please let me know if you have any other questions. We, of course, do not want to violate any laws or rules. That being said, I believe no infraction has been committed and I ask that this complaint be denied and that no further action by the commission be necessary.

Sincerely,

Alex Titcomb
Principal Officer
The Dinner Table PAC

Dick Bradstreet

44 Harmony Lane
Vassalboro ME 04989
United States
207-861-1657
dickbradstreet@gmail.com

Occupation
Retired

Employer
Retired

Referred By

[Close](#) [Print](#) [◀](#) [▶](#)

#211205497009
ID: d0ac21d995681e6aff581
Campaign Name: General Fund

December 4, 2021
9:12PM EST

Donated Amount 120.00
Fees (5.10)
Total \$114.90

Visa **** 4779

COMPLETED

LAUREL LIBBY

442 Park Avenue
AUBURN ME 04210
United States
207-632-7619
laurel@laurellibby.com

Occupation
Interior Decorator

Employer
Self

[Close](#) [Print](#) [◀](#) [▶](#)

#211206543839
ID: d466597356e17f961ba30
Campaign Name: Auction

December 6, 2021
3:10PM EST

Donated Amount 700.00
Fees (0.30)
Total \$699.70

PayPal

COMPLETED

Josanne Dolloff

6 Hemingway Rd
Milton Township ME 04219
United States
207-357-3346
josanne.dolloff@yahoo.com

Occupation
Retired

Employer
Retired

Referred By
josanne.dolloff@yahoo.com

Close **Print** ◀ ▶

#211118240189
ID: deff8f17271a6ee3839c3
Campaign Name: General Fund

November 18, 2021
3:36PM EST

Donated Amount 10.00
Fees (0.70)
Total \$9.30

Visa **** 8905

COMPLETED

Josanne Dolloff

6 Hemingway Rd
Milton Township ME 04219
United States
207-357-3346
josanne.dolloff@yahoo.com

Occupation
Retired

Employer
Retired

Close **Print** ◀ ▶

#211218806604
ID: d19c38870a47479cd5007
Campaign Name: General Fund

December 18, 2021
4:12AM EST

Donated Amount 10.00
Fees (0.70)
Total \$9.30

Visa **** 8905

COMPLETED

Josanne Dolloff

6 Hemingway Rd
Milton Township ME josanne.dolloff@yahoo.com
United States
207-357-3346
josanne.dolloff@yahoo.com

Occupation
Retired

Employer
Retired

I am interested in becoming an 'Official' Member of The Dinner Table!
no

Close

Print



#211223684013
ID: d983c9831ac7a882b8c7d
Campaign Name: Mossberg

December 23, 2021
6:17PM EST

Donated Amount	30.00
Fees	(1.50)
Total	\$28.50

PayPal

COMPLETED

William Faulkingham

P.O. Box 121
16 barnacle lane
Winter Harbor ME 04693
United States
207-460-6967
billybob518709@msn.com

Occupation
Fisherman

Employer
Self

Referred By

Close

Print



#211001870229
ID: d64528329c482060afae4
Campaign Name: General Fund

October 1, 2021
8:46AM EDT

Donated Amount	60.00
Fees	(2.70)
Total	\$57.30

PayPal

COMPLETED

William Faulkingham

P.O. Box 121
Winter Harbor ME 04693
United States
207-460-6967
billybob518709@msn.com

Occupation
Fisherman

Employer
Self

Close

Print



#211206865612
ID: dd5f30b7e132639c64480
Campaign Name: Auction

December 6, 2021
10:32AM EST

Donated Amount	553.00
Fees	(22.42)
Total	\$530.58

PayPal

COMPLETED

Shelley Rudnicki

211 Norridgewock road
Fairfield ME 04937
United States
207-314-6898
shelleyrudnicki@gmail.com

Occupation
Car sales

Employer
Shelley's Used Cars

Close

Print



#211206127999
ID: d76fc1cd76751c0e54f93
Campaign Name: Auction

December 6, 2021
4:27PM EST

Donated Amount	120.00
Fees	(0.30)
Total	\$119.70

Visa **** 6156

COMPLETED

Shelley Rudnickin

211 Norridgewock road
fairfield ME 04937
United States
207-314-6898
shelleyrudnicki@gmail.com

Occupation
Owner

Employer
Shelleys used cars

I am interested in becoming an 'Official' Member of The Dinner
Table!
no

Close

Print



#211223913018
ID: d725936db96c68143544d
Campaign Name: Mossberg

December 23, 2021
5:34PM EST

Donated Amount	60.00
Fees	(2.70)
Total	\$57.30

MasterCard **** 9166

COMPLETED

John Andrews

PO Box 118
Paris ME 04271
United States
207-739-9075
andrewsedc@gmail.com

Occupation
Legislator

Employer
ME Legislature

I am interested in becoming an 'Official' Member of The Dinner Table!
no

Close

Print



#211223261374
ID: de6ba371b8ea7ff62d20d
Campaign Name: Mossberg
December 23, 2021
5:28PM EST

Donated Amount	30.00
Fees	(1.50)
Total	\$28.50

MasterCard **** 0827

COMPLETED

Dan Costain

292 Ridge Road
Plymouth ME 04969
United States
207-852-1932
dancostain@gmail.com

Occupation
Legislators

Employer
Legislator

Referred By
Shelly Rudnicki

Close

Print



#211123859961
ID: d9d240a61cd07de234202
Campaign Name: General Fund
November 23, 2021
5:15PM EST

Donated Amount	120.00
Fees	(5.10)
Total	\$114.90

Bank Account

COMPLETED

Dan Costain

292 Ridge Rd
Plymouth ME 04969
United States
207-852-1932
dancostain@gmail.com

Occupation
Legislative

Employer
State

Close

Print



#211206417820
ID: dd98bd9a016af269ab9f0
Campaign Name: Auction

December 6, 2021
1:36PM EST

Donated Amount	155.00
Fees	(0.30)
Total	\$154.70

Bank Account

COMPLETED

Dan Costain

292 Ridge Road
Plymouth ME 04969
United States
dancostain@gmail.com

Occupation
Retired

Employer
Retired

I am interested in becoming an 'Official' Member of The Dinner Table!
no

Close

Print



#211219325585
ID: d0297d9e82260572ee7e0
Campaign Name: Mossberg

December 19, 2021
6:38AM EST

Donated Amount	30.00
Fees	(1.50)
Total	\$28.50

Bank Account

COMPLETED

Paul Davis

36 Townhouse Road
Sangerville ME 04479
United States
207-343-0258
sendavis@myottmail.com

Occupation
Senator

Employer
State of Maine

Referred By
Laurel Libby

Close

Print



#211005991558

ID: d80f125eeb18247ac3147

Campaign Name: General Fund

October 5, 2021

11:02AM EDT

Donated Amount	210.00
Fees	(8.70)
Total	\$201.30

Visa **** 9682

COMPLETED

Jack Ducharme

34 Heald St
Madison ME 04950
United States
+1-207-431-0775
jack.ducharme58@gmail.com

Occupation
Representative

Employer
State of Maine

Close

Print



#211208610682

ID: d86c83e0d958851737e2e

Campaign Name: Auction

December 7, 2021

9:15PM EST

Donated Amount	25.00
Fees	(0.30)
Total	\$24.70

MasterCard **** 3020

COMPLETED

Jack Ducharme

34 Heald St
Madison ME 04950
United States
+1-207-431-0775
jack.ducharme@myfairpoint.net

Occupation
Administrator

Employer
Corson & Blaisdell P. A.

Referred By
N/A

Close

Print



#211217555946

ID: dd719067d4aa1aa9a0cef

Campaign Name: General Fund

December 17, 2021

6:53PM EST

Donated Amount	120.00
Fees	(5.10)
Total	\$114.90

MasterCard **** 3020

COMPLETED

Jack Ducharme

34 Heald Street
Madison ME 04950
United States
207-431-0775
jack.ducharme58@gmail.com

Occupation
Representative

Employer
State of Maine

I am interested in becoming an 'Official' Member of The Dinner Table!
no

Close

Print



#211219312502

ID: dd8bc63e45f25a8bae47a

Campaign Name: Mossberg

December 18, 2021

8:39PM EST

Donated Amount	20.00
Fees	(1.10)
Total	\$18.90

MasterCard **** 3020

COMPLETED

RANDALL ADAM GREENWOOD

38 Witherell Road
Wales ME 04280
United States
207-754-6604
greenwood611@aol.com

Occupation
REPRESENTATIVE

Employer
State Of Maine

I am interested in becoming an 'Official' Member of The Dinner Table!
no

Close

Print



#211219963570
ID: dd6c0515f977c9a179178
Campaign Name: Mossberg

December 18, 2021
8:44PM EST

Donated Amount	10.00
Fees	(0.70)
Total	\$9.30

Bank Account

COMPLETED

Jeff Hanley

52
TURNER DR
Pittston ME 04345
United States
+1-207-582-1524
19woody51@myfairpoint.net

Occupation
Legislator

Employer
State of Maine

Referred By

Close

Print



#211124415044
ID: d0c239bb77bf95bdfbf57
Campaign Name: General Fund

November 24, 2021
5:30PM EST

Donated Amount	120.00
Fees	(5.10)
Total	\$114.90

Visa **** 8881

COMPLETED

Michael Lemelin

313 Hallowell Road
Chelsea ME 04330
United States
207-798-9399
chiroworks@yahoo.com

Occupation
State Representative

Employer
State of Maine

Referred By

Close **Print** ◀ ▶

#211122270452
ID: dcf479b7ee9025c42da75
Campaign Name: General Fund

November 22, 2021
4:26PM EST

Donated Amount	120.00
Fees	(5.10)
Total	\$114.90

Visa **** 9806

COMPLETED

Representative Connor and Foster both provided donation via checks and said “Legislator/State Rep” was their occupation when asked.

"All great change in America begins at the dinner table."

- Ronald Reagan

Yes, I/we support The Dinner Table's mission to elect more Conservatives to Augusta! Please find my/our contribution of:

\$10 \$25 \$40 \$50 \$75 \$100 Other \$ _____

\$120 (1 year membership) \$240 (2 year membership)

Please make checks payable to "The Dinner Table"

Name _____

Address _____

Cell Phone (____) _____ Other Phone (____) _____

E-mail Address _____

Employer* _____

Occupation* _____

State law requires us to use our best efforts to collect and report the name, address, occupation, and employer of individuals whose contribution exceeds \$50 in an election cycle. Contributions to The Dinner Table are not tax deductible for federal or state income tax purposes.

Paid for and authorized by The Dinner Table.

Initial Membership Form

Thank You for joining The Dinner Table and supporting our mission to elect principled conservatives and win a Republican Majority in the State House of Representatives.

First & Last Name *

Sue Bernard

Phone number *

207-210-0518

Email *

sbernard@nmcc.edu

Address *

70 Grimes Road

Employer (required for ethics) *

Northern Maine Community College

Occupation (required for ethics) *
Executive Assistant to the President

Who Referred you to The Dinner Table? *
Laurel Libby

What's your preferred method of communication? *

- Facebook
- Email
- Text Message
- Phone Call

Do you want to be added to The Dinner Table Member group on Facebook? *

- Yes
- No

if Yes, please provide your Facebook URL (ex. <https://www.facebook.com/alex.titcomb.1>)

<https://www.facebook.com/VoteBernardforME/>

Title 21-A Maine Revised Statutes

§ 1017. Reports by candidates

...

5. Content. A report required under this section must contain the itemized accounts of contributions received during that report filing period, including the date a contribution was received, and the name, address, occupation, principal place of business, if any, and the amount of the contribution of each person who has made a contribution or contributions aggregating in excess of \$50. The report must contain the itemized expenditures made or authorized during the report filing period, the date and purpose of each expenditure and the name and address of each payee and creditor and any refund that a payee has made to the candidate or an agent of the candidate. If the payee is a member of the candidate's household or immediate family, the candidate shall disclose the candidate's relationship to the payee in a manner prescribed by the commission. The report must contain a statement of any loan to a candidate by a financial institution in connection with that candidate's candidacy that is made during the period covered by the report, whether or not the loan is defined as a contribution under section 1012, subsection 2, paragraph A. The candidate and the treasurer are jointly and severally responsible for the timely and accurate filing of each required report.

§ 1017-A. Reports of contributions and expenditures by party committees

1. Contributions. A party committee shall report all contributions in cash or in kind from a single contributor that in the aggregate total more than \$200. The party committee shall report the name, mailing address, occupation and place of business of each contributor. Contributions of \$200 or less must be reported, and these contributions may be reported as a lump sum.

§ 1059. Report; filing requirements

...

5. Electronic filing. A committee shall file each report required by this section through an electronic filing system developed by the commission. The commission may make an exception to this electronic filing requirement if a committee submits a written request that states that the committee lacks access to the technology or the technological ability to file reports electronically. The request for an exception must be submitted within 30 days of the registration of the committee. The commission shall grant all reasonable requests for exceptions.

§ 1060. Content of reports

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

...

6. Identification of contributions. An itemization of each contribution of more than \$50 made to or received by the committee for the purpose of initiating or influencing a campaign, including the name, occupation, places of business and mailing address of each contributor and the amount and date of the contribution;

94-270 COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES

Chapter 1: PROCEDURES

SECTION 6. CONTRIBUTIONS AND OTHER RECEIPTS

...

3. Candidates and political action committees must report the name, address, occupation and employer of each individual contributor who gives, in the aggregate, more than \$50 for the reporting period. The reporting is required for private contributions raised by privately financed candidates and for seed money contributions to candidates participating in the *Maine Clean Election Act*. Candidates, political action committees, ballot question committees, and party committees must make a reasonable effort to obtain the employment information of the contributor when required by statute. The reasonable effort must include requesting the employment information and providing a convenient means for the donor to provide the information, such as a paper form to be submitted with a contribution or text fields to enter the information on an online fundraising screen. If a candidate or committee is unable to obtain the information from the contributor in response to a candidate's or committee's request, the candidate or committee shall indicate "information requested" in the occupation and employer sections of the campaign finance report. If the Commission staff believes that due to the amount of missing information further inquiry is warranted, the Commission staff shall verify whether the candidate or committee has made a reasonable effort to obtain the information.