



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

To: Commission
From: Jonathan Wayne, Executive Director
Date: October 23, 2019
Re: Request to Investigate Contributions made by the Gideon Leadership PAC

On August 22, 2019, the Maine Commission on Governmental Ethics and Election Practices (“Commission”) received the attached request for investigation from Edward Youngblood concerning six contributions made by the Gideon Leadership political action committee (“PAC”) in 2015-2016. (Youngblood request letter, at ETH-17 – ETH-110) The committee is the leadership PAC of State Rep. Sara Gideon, currently the Speaker of the Maine House of Representatives. Two of the contributions were to Maine-based PACs and the other four contributions were to a federal candidate and political committee.

Public filings suggest that Rep. Gideon made the six contributions with her own money and was later reimbursed by the Gideon Leadership PAC. When the recipient committees filed campaign finance reports with the Commission and the Federal Election Commission (“FEC”), they reported receiving the contributions from Sara Gideon, rather than from the Gideon Leadership PAC. Mr. Youngblood asserts that this arrangement violated Maine campaign finance law because the Gideon Leadership PAC made contributions “in the name of another, Sara Gideon.” (ETH-20) In addition, he alleges that the contributions violated federal campaign finance law. He has filed a separate complaint with the FEC, which will consider the federal compliance issues in due course.

Sara Gideon responds that when she made the contributions (more than three years ago), she believed in good faith that her payments and the PAC’s reimbursements were permissible. (Gideon response, at ETH-119) At that time, she was in her second term as

a State Representative and first term as the assistant leader of her caucus. She explains that upon learning of potential federal compliance issues, she took prompt remedial action by personally paying the amount of the PAC's reimbursements to the U.S. Treasury. (ETH-118)

Based on the information preliminarily available, it is difficult for the Commission staff to see how an investigation would lead to a determination that the Gideon Leadership PAC committed the legal violation of "making contributions in the name of another." We believe this violation is intended to apply to situations where it is demonstrated that a contributor intends to remain concealed by contributing through an intermediary or conduit. This case is different because the Gideon Leadership PAC *clearly intended* to report the contributions *in its own name* in campaign finance reports filed with this Commission. For all six contributions, the Gideon Leadership PAC publicly reported that it had reimbursed Sara Gideon for the contributions. Accordingly, the staff recommends against conducting any campaign finance or legislative ethics investigation as requested, but we will gladly undertake any direction the Commission determines to be appropriate.

We acknowledge, however, that some of the reporting by the Maine PACs in this matter could have painted a clearer picture of the payments and reimbursements. We presume that Sara Gideon did not inform the two recipient Maine-based PACs (the House Democratic Campaign Committee and the Golden Leadership Fund) that the funds she was donating originated with her leadership PAC, and not from her personal funds. If she had made this communication, these two PACs hopefully would have reported the Gideon Leadership PAC as the contributor, rather than Sara Gideon. This lack of communication was not illegal, but it may have contributed to unclear reporting. Also, when the Gideon Leadership PAC reported reimbursing Sara Gideon, it could have more clearly identified the federal candidate and committee that ultimately received three of the six contributions. While their financial reporting could have been clearer, we believe the Maine PACs substantially complied with current Maine law and published Commission guidance and should not be viewed as "contributing in the name of another."

Relevant Law

Standard for opening a requested investigation

The Election Law authorizes the Commission to receive requests for investigation and to conduct an investigation “if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred.”

A person may apply in writing to the commission requesting an investigation as described in subsection 1. The commission shall review the application and shall make the 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)) (ETH-1)

Commission jurisdiction – state candidate elections only

The Commission does not have jurisdiction over contributions to federal candidates and political committees:

This subchapter applies to candidates for all state and county offices and to campaigns for their nomination and election. Candidates for municipal office as described in Title 30-A, section 2502, subsection 1 are also governed by this subchapter. The commission does not have jurisdiction over financial activities to influence the nomination or election of candidates for federal office.

(21-A M.R.S. § 1011) (ETH-12)

Financial reporting

Under Maine campaign finance law, candidates for state office, political action committees, and party committees are required to report all contributions they have received above certain monetary thresholds, including the name and address of the contributor and the date and amount of the contribution. (21-A M.R.S. §§ 1017(5), 1017-A(1) & 1060(6)) Accurate reporting of contributors assists members of the public to understand the actual sources of contributions received by candidates and committees.

Accurate contributor reporting is also important to verify compliance with contribution limits and other legal requirements.

Making a contribution in the name of another

Maine campaign finance law makes it a Class E crime to knowingly make a contribution in the name of another person or to allow one's name to be used for this purpose:

The violation of any of the following subsections is a Class E crime. ...

3. Contributions in another's name. A person may not knowingly:
 - A. Make a contribution in the name of another person;
 - B. Permit the person's name to be used to accomplish a contribution in violation of paragraph A; or
 - C. Accept a contribution made by one person in the name of another person. ...

(21-A M.R.S. § 1004(3)) (ETH-10) The conduct may also result in civil penalties:

A person that makes a contribution in the name of another person, or that knowingly accepts a contribution made by one person in the name of another person, may be assessed a penalty not to exceed \$5,000.

(21-A M.R.S. § 1004-A(3)) (ETH-11)

Giving a contribution through an intermediary or conduit

If a person (either an individual or association) gives money to an intermediary or conduit for the purpose of contributing it *to a candidate*, the intermediary or conduit is required by statute to disclose the original source of the contribution to the candidate so that the candidate may report the original source as the contributor. (21-A M.R.S. § 1015(4)) (ETH-12) This provision was written in the law governing contributions to candidates to avoid circumvention of contribution limits. No similar provision exists in the law governing contributions to PACs and ballot question committees.

Legislative ethics

In 1 M.R.S. §§ 1001-1051, the Maine Legislature established a legislative ethics law, which, among other things, defines certain acts of misconduct as a “violation of

legislative ethics.” The term “violations of legislative ethics” is defined 1 M.R.S. § 1012(10) to mean “a violation of the prohibitions in section 1014 or 1015.” (ETH-1)

These violations include:

- conflicts of interest (1 M.R.S. § 1014(1))
- unduly influencing a Maine state agency or authority (1 M.R.S. § 1014(2-A))
- abuse of office or position (1 M.R.S. § 1014(3))
- contracting with a state governmental agency without competitive bidding (1 M.R.S. § 1014(4))
- receiving campaign contributions from lobbyists or their clients during a legislative session (1 M.R.S. § 1015(3))

(ETH-5 – ETH-8).

In 1 M.R.S. § 1013, the Maine Legislature set out strict procedures by which the Commission may receive complaints of violations of legislative ethics. A person may file a complaint against a Legislator alleging a violation of legislative ethics only as described in sections 1014 and 1015. (1 M.R.S. § 1013(2)(B-1)) (ETH-1) The Commission may only consider activity by a Legislator that occurred or was ongoing within two years of the filing of the complaint. (1 M.R.S. § 1013(2)(B-1)(2)) (ETH-2) The complainant must keep the complaint confidential unless the Commission decides to pursue the complaint. (1 M.R.S. § 1013(2)(B-1)) (ETH-2, ETH-4)

Reported Contributions

Contributions Reported by the Recipient Committees

Mr. Youngblood alleges that the Gideon Leadership PAC made six contributions in the name of Sara Gideon. The details of the transactions, as reported by the recipient committees in campaign finance reports, are shown on the table on the next page. (The Commission staff has not verified the payment dates and amounts.) To see the actual pages from the relevant campaign finance reports, please refer to exhibits B-G of Mr. Youngblood’s request. (The page numbers are noted in the table.) The recipient

committees apparently received the payments directly from Sara Gideon, and then reported her as the contributor.

Contributions as Reported by Recipient Committees				
Recipient Committee	Reported Date	Reported Amount	Reported Contributor	Agency Receiving Campaign Finance Report
Cain for Congress (ETH-29 – ETH-31)	9/30/15	\$1,000.00	Sara I Gideon	FEC
Cain for Congress (ETH-33 – ETH-35)	6/13/16	\$250.00	Sara I Gideon	FEC
House Democratic Campaign Committee (ETH-37 – ETH-47)	8/3/16	\$250.00	Sara Gideon	Maine Ethics Commission
Golden Leadership Fund (ETH-49 – ETH-56)	6/25/16	\$250.00	Sara Gideon	Maine Ethics Commission
Maine Democratic State Committee (Federal account) (ETH-58 – ETH-60)	7/11/16	\$1,000.00	Sara I. Gideon	FEC
Maine Democratic State Committee (Federal account) (ETH-62 – ETH-64)	10/3/16	\$500.00	Sara I. Gideon	FEC

To clarify the nature of these four recipient committees:

- In 2015-2016, Emily Cain was engaged in her second campaign for U.S. Representative for the second congressional district in Maine. Contributions to her campaign were subject to federal campaign finance laws. She filed campaign finance reports with the FEC.
- The House Democratic Campaign Committee is a Maine-based PAC established to promote Democratic nominees to the Maine House of Representatives. It files campaign finance reports with the Commission.
- The Golden Leadership Fund was a leadership PAC established by then-State Representative Jared Golden. The PAC filed campaign finance reports with the

Commission for about two years until Rep. Golden terminated the PAC in November 2017.

- The federal account of the Maine Democratic State committee is a separate bank account established by the Maine Democratic Party to promote candidates in federal elections and engage in other permissible activities. Below in this memo, I refer to this account as the “MDP federal account.” Contributions to this account must comply with federal law. The MDP federal account files campaign finance reports with the FEC.

Reimbursements Reported by Gideon Leadership PAC

The Gideon Leadership PAC is a Maine PAC which registered with the Commission in May 2014. (ETH-24 – ETH-27) Sara Gideon was the principal officer of the PAC, until she dissolved it in June 2019. In campaign finance reports filed with the Commission, the Gideon Leadership PAC disclosed the following payments, and described the purpose of the payments as a reimbursement to Sara Gideon for contributions:

Reported Payee	Reported Date	Reported Amount	Reported Explanation of Purpose
Sara Gideon (ETH-31)	10/28/15	\$1,000.00	Reimbursement for federal contribution
Emily Cain for Congress (ETH-35)	6/1/16	\$250.00	Contribution - Reimbursement to Sara Gideon
House Democratic Campaign Committee (ETH-38)	6/1/16	\$250.00	Contribution - Reimbursement to Sara Gideon
Golden Leadership Fund (ETH-50)	6/27/16	\$250.00	Contribution - Reimbursement to Sara Gideon
Sara Gideon (ETH-60)	7/25/16	\$1,000.00	Reimbursement for MDP contribution
Sara Gideon (ETH-64)	10/12/16	\$500.00	Reimbursement for contribution

Violations Alleged by Mr. Youngblood

Alleged violation of state election law. Mr. Youngblood asserts that the Gideon Leadership PAC violated 21-A M.R.S. § 1004(3)(A) by contributing in the name of another, Sara Gideon. The allegation is summed up in the first full paragraph on the fourth page of his letter:

As such, there can be no question that the PAC and not Sara Gideon was the true contributor to committees in question and that Gideon Leadership PAC made a contribution in the name of another, Sara Gideon, in direct violation of the giving in another's name prohibition at Me. Rev. Stat. tit. 21-A, § 1004(3)(A).

(ETH-20)

Mr. Youngblood also claims Sara Gideon violated 21-A M.R.S. § 1004(3)(B) by allowing her name to be used in the PAC's contributions under another's name. (ETH-20)

Violation of federal law. On the fourth and fifth pages of his letter, Mr. Youngblood asserts that the Gideon Leadership PAC violated three provisions in federal campaign finance law: (1) contributing in the name of another, (2) failing to register and report as a political committee with FEC, and (3) not segregating funds it had received from corporations from funds that it donated to federal candidates and committees. (ETH-20 – ETH-21) For your reference, those alleged violations are described in more detail in an attached memo from the Commission's Political Committee and Lobbyist Registrar, Michael Dunn. (ETH-122 – ETH-124)

Violation of legislative ethics law. Mr. Youngblood urges the Commission to evaluate whether Sara Gideon's "use of her state PAC to violate federal law conforms with the requirement in the Legislative Code of Ethics that legislators must abide by 'high moral and ethical standards.'" (ETH-21)

Response by Sara Gideon

Sara Gideon provided a letter-response through her attorneys Benjamin K. Grant of the McTeague Higbee law firm in Topsham, Maine and Perkins Coie, LLP in Washington, D.C. (ETH-116 – ETH-121) She states that she believed her payments and the PAC’s reimbursements were permissible (ETH-116), which is why her PAC reported all of the reimbursements in its campaign finance reports. (ETH-119) She was unaware of even an appearance of any violation. (ETH-121) Once she was alerted to possible compliance issues, she disgorged the funds to the U.S. Department of Treasury. (*Id.*) She denies involvement in any “scheme” to give in the name of another, and points to the lack of any bad motive or substantial harm to the public. (ETH-120)

Sara Gideon argues that the four federal contributions are outside the scope of the Commission’s jurisdiction, as defined in 21-A M.R.S. § 1011. (ETH-117) She also contends that Mr. Youngblood’s request has not stated a “violation of legislative ethics” that the Commission is authorized to investigate. (ETH-117 – ETH-118)

Analysis and Recommendation by Commission Staff

The Commission staff recommends against conducting any investigation or taking other action in response to Mr. Youngblood’s request, for the reasons below.

Standards for Conducting an Investigation

The Commission is authorized 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)) (ETH-9) If the preliminary facts suggest little likelihood of a campaign finance violation, the Commission staff typically recommends against an investigation.

Contributions in the Name of Another

The State of Maine (like many other jurisdictions) forbids making a contribution in the name of another person or allowing one’s name to be used in the making of such a

contribution. (21-A M.R.S. § 1004(3)(A) & (B)) (ETH-10) Violations of this type are rarely identified in Maine elections, but they are discovered in other states with some regularity. The typical pattern is that a contributor wishes to give more to a candidate than is allowed by law, so the contributor gives money to close family, friends, or employees to contribute to the candidate. This is inherently deceptive conduct in which the true source of the funds wishes to remain hidden, so the contributions are made and reported in the name of an intermediary or conduit. A one-page summary of four examples is attached. (ETH-125)

In the opinion of the Commission staff, the Gideon Leadership PAC is distinguishable from these cases in one important respect. The Gideon Leadership PAC clearly intended to report making contributions in its own name by reimbursing Sara Gideon. The six relevant expenditure entries from the Gideon Leadership PAC’s campaign finance reports are copied below:

10/28/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR FEDERAL CONTRIBUTION	OTH	\$1,000.00
6/1/2016	EMILY CAIN FOR CONGRESS PO BOX 1523 BANGOR, ME 04402	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	FND	\$250.00
6/1/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION – REIMBURSEMENT TO SARA GIDEON	CON	\$250.00
6/27/2019	GOLDEN LEADERSHIP FUND PO BOX 5307 AUGUSTA, ME 04332	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00
7/25/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR MDP CONTRIBUTION	OTH	\$1,000.00
10/12/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR CONTRIBUTION	OTH	\$500.00

(ETH-31, ETH-35, ETH-38, ETH-50, ETH-60, ETH-64)

In the staff’s view, the facts and evidence presented in this matter do not support a conclusion that the Gideon Leadership PAC engaged in the deceptive conduct that the Legislature sought to prohibit in 21-A M.R.S. § 1004(3). In its campaign finance reports, the PAC disclosed that it, not Sara Gideon, was the source of the contributions.

For this reason, we recommend against conducting a campaign finance investigation into this allegation.

We acknowledge that the financial reporting by the Gideon Leadership PAC should have been more detailed with respect to three of the federal contributions (the first, fifth and sixth items in the array of expenditures on the previous page). PACs are required to identify the names of “all candidates” and “all political committees” supported by the PAC. (21-A M.R.S. §§ 1060(1) & (2)) The entry for the October 28, 2015 expenditure does not indicate that it was a reimbursement for a contribution to Cain for Congress, and the entry for the October 12, 2016 expenditure does not indicate it was a reimbursement for a contribution to the federal account of the Maine Democratic Party. The PAC described the purpose of the July 25, 2016 expenditure as “Reimbursement for MDP Contribution,” but the acronym may not convey to members of the public that this was a contribution to the federal account of the Maine Democratic Party. We cannot find any reason to fault, however, the Gideon Leadership PAC’s reporting of the reimbursements to Sara Gideon for the contributions to the Maine-based PACs (the House Democratic Campaign Committee or the Golden Leadership Fund).

The financial reporting by the House Democratic Campaign Committee and the Golden Leadership Fund would have been clearer if Sara Gideon had informed them that she was acting as an intermediary and that the funds she was donating originated with her leadership PAC, and not from her personal funds. Unlike campaign finance law regarding contributions to candidates, there is no legal requirement that an intermediary communicate to a recipient PAC or BQC the source of the contribution. Nevertheless, the failure to communicate this information can cause confusion about the actual contributor to a PAC or BQC, as it has in this case.

Lack of Jurisdiction Over Contributions to Federal Candidates and Committees

In addition, the Commission staff believes there is a jurisdictional barrier to investigating the contributions to Cain for Congress and the MDP federal account. Contributions to federal candidates and federal political committees are governed by the U.S. Code, Title 52, sections 30101-30126, and Title 11 of the Code of Federal Regulations. The FEC has developed procedures and guidance to make sure that contributions to federal candidates and political committees are disclosed clearly for the benefit of the public. Accordingly,

the Maine Legislature decided that: “The [Ethics] commission does not have jurisdiction over financial activities to influence the nomination or election of candidates for federal office.” (21-A M.R.S. § 1011) (ETH-12) If there is a rationale for investigating the Gideon Leadership PAC’s contributions to Cain for Congress and the MDP federal account, the investigation should be conducted by the FEC, which would apply federal law, guidance and precedent to determine if the system of federal campaign finance disclosure was undermined.

Legislative Ethics Violation

Mr. Youngblood urges the Commission to consider whether Rep. Gideon’s “use of her State PAC to violate federal law conforms with the direction in the Legislative Code of Ethics to abide by ‘high moral and ethical standards.’” The Legislative Code of Ethics is a statement of ethics adopted by each Legislature at the beginning of the First Regular Session. The most recent version available is attached, for your reference. (ETH-126)

The Commission does not have the statutory authority to investigate allegations of violations of the Legislative Code of Ethics. Such investigations would be solely under the jurisdiction of the legislative body of which the Legislator is a member.

The Commission’s jurisdiction to consider complaints of legislative conduct is time-limited and extends only to violations listed in 1 M.R.S. §§ 1014 & 1015 (conflicts of interest, unduly influencing a state agency, abuse of office or position, contracting with a state agency without competitive bidding, or accepting contributions from a lobbyist or client during session). (ETH-5 – ETH-8) Mr. Youngblood’s complaint fails to allege any specific violation of section 1014 or 1015 and concerns conduct that occurred more than three years ago. Therefore, the Commission staff believes the Commission does not have the statutory jurisdiction to initiate an investigation of a violation of legislative ethics.

Federal Campaign Finance Law

As recognized by Mr. Youngblood, the Commission does not have jurisdiction to investigate whether Sara Gideon or the Gideon Leadership PAC violated federal campaign finance laws. Those issues will presumably be considered by the FEC in response to the complaint which Mr. Youngblood filed with that authority.

Improving Commission Guidance on Reporting Contributions

To the best of our knowledge, it is rare for a contributor to earmark or otherwise direct a contribution through an intermediary or conduit to a Maine PAC or ballot question committee (BQC). Nevertheless, the Commission staff believes the best practice in these situations is for the recipient PAC or BQC to report the original person that provided the funds as the contributor – rather than the intermediary or conduit.

To provide better guidance on this reporting issue, we propose inserting the following language in the PAC/BQC Guidebook for the 2020 elections:

All contributions that are earmarked or otherwise directed through an intermediary or conduit to a PAC or BQC are considered to be contributions from that person to the PAC or BQC. The intermediary or conduit shall inform the recipient PAC or BQC of the name of the person who originally provided the contribution. In campaign finance reports, the PAC or BQC shall disclose that original source as the contributor, rather than the intermediary or conduit.

In previous election years, we have included similar language in our guidebooks for candidates, based on the following language in the contribution limits statute that applies to contributions to candidates:

For the purposes of the limitations imposed by this section, all contributions made by a person, either directly or indirectly, on behalf of a particular candidate, that are in any way earmarked or otherwise directed through an intermediary or conduit to the candidate are considered to be contributions

from that person to the candidate. The intermediary or conduit shall report the original source and the intended recipient of the contribution to the commission and to the intended recipient.

(21-A M.R.S. § 1015(4)) (ETH-12) There is no similar language in Maine campaign finance law concerning contributions made through an intermediary or conduit to a PAC or BQC. However, the statutory prohibition against making a contribution in the name of another and the requirement that PACs and BQCs accurately report the source of their contributions provide sufficient support for the staff's proposed guidance.

Thank you for your consideration of this memo.

Title 1, Maine Revised Statutes (Legislative Ethics)

§ 1012. Definitions

As used in this subchapter, unless the context otherwise indicates, the following terms have the following meanings.

...

10. Violation of Legislative Ethics. “Violation of legislative ethics” means a violation of the prohibitions in section 1014 or 1015.

§ 1013. Authority; procedures

1. Authority. The commission has authority:

A. To issue, on request of any Legislator on an issue involving that Legislator, or on its own motion, written advisory opinions and guidance on problems or questions involving possible violations of legislative ethics;

B. To investigate complaints alleging a violation of legislative ethics against any Legislator, to investigate a possible violation of legislative ethics upon the commission’s own motion, to hold hearings on an alleged or possible violation if the commission determines it is appropriate and to issue findings of fact together with its opinion; and

C. To administer the disclosure of sources of income by Legislators as required by this subchapter.

2. Procedure. The following procedures apply.

A. Requests for advisory opinions by members of the Legislature must be filed with the commission in writing and signed by the Legislator requesting the opinion and must contain such supporting data as the commission requires. Commission staff shall inform a Legislator upon that Legislator’s request for an advisory opinion that written opinions issued by the commission are public and are submitted to the Clerk of the House and the Secretary of the Senate and entered into the legislative record. When preparing an advisory opinion on its own motion, the commission shall notify the Legislator concerned and allow the Legislator to provide additional information to the commission. In preparing an advisory opinion, either upon request or on its own motion, the commission may make such an investigation as it determines necessary. A copy of the commission’s advisory opinion must be sent to the Legislator concerned and to the presiding officer of the legislative body of which the Legislator is a member.

B-1. Any person may file a complaint against a Legislator alleging a violation of legislative ethics only as described in sections 1014 and 1015. The complaint must be filed in writing and signed under oath and must specify the facts of the alleged

violation citing the specific provisions of sections 1014 and 1015 that are alleged to have been violated, the approximate date of the alleged violation and such other information as the commission requires. A complainant shall agree in writing not to disclose any information about the complaint during the time the commission is determining whether or not to pursue the complaint or during the investigation of a complaint. A complaint that does not meet the criteria of this paragraph is considered incomplete and will not be forwarded to the commission.

- 1) The Legislator against whom a complaint is filed must immediately be given a copy of the complaint and the name of the complainant. Before deciding whether to conduct an investigation or to hold any hearings, the commission shall afford the Legislator an opportunity to answer the complaint in writing and in person to the commission. The commission staff may gather preliminary factual information that will assist the commission in deciding whether to conduct a full investigation or to hold hearings.
- 2) The commission shall consider only complaints against Legislators in office at the time of the filing of the complaint and only complaints relating to activity that occurred or was ongoing within 2 years of the complaint. Upon a majority vote of the commission, the commission shall conduct an investigation and hold hearings as it determines necessary.
- 3) The commission shall issue its findings of fact together with its opinion regarding the alleged violation of legislative ethics to the legislative body of which the Legislator concerned is a member. That legislative body may take whatever action it determines appropriate, in accordance with the Constitution of Maine.
- 4) If the commission determines that a Legislator has potentially violated professional standards set by a licensing board, its opinion and such other information as may be appropriate must be referred to the licensing board that oversees the Legislator's professional conduct.

B-2. If the commission receives information other than through a complaint suggesting that a Legislator may have committed a violation of legislative ethics, the commission may commence an investigation or conduct hearings when there is probable cause to believe that a violation has occurred. The commission may consider only activities by a Legislator in office at the time of the investigation that occurred or were ongoing within 2 years of the investigation. The commission shall provide the Legislator with written notice of the possible violation and an opportunity to be heard in accordance with the requirements of paragraph B-1. The commission's consideration of the possible violation is subject to the confidentiality provisions of subsection 3-A.

C. When the conduct of a particular Legislator is under inquiry and a hearing is to be held, the Legislator must be given written notification of the time and place at which

the hearing is to be held. Such notification must be given not less than 10 days prior to the date set for the hearing.

D. The commission has authority, through its chair or any member designated by the chair, to administer oaths, subpoena witnesses and compel the production of books, records, papers, documents, correspondence and other material and records the commission determines relevant. The State, its agencies and instrumentalities shall furnish to the commission any information, records or documents the commission designates as being necessary for the exercise of its functions and duties. In the case of refusal of any person to obey an order or subpoena of the commission, the Superior Court, upon application of the commission, has jurisdiction and authority to require compliance with the order or subpoena. Any failure of any person to obey an order of the Superior Court may be punished by that court as contempt thereof.

E. The commission shall adopt rules consistent with due process for the conduct of investigations and hearings under this subchapter. Rules adopted pursuant to this paragraph are major substantive rules pursuant to Title 5, chapter 375, subchapter 2-A.

The commission is not bound by the strict rules of evidence, but its findings and opinions must be based upon competent and substantial evidence.

E-1. The commission may permit the complainant to make a presentation to the commission as part of its consideration whether to conduct an investigation or public hearing.

F. If the commission concludes that it appears that a Legislator has violated a criminal law, a copy of its findings of fact, its opinion and such other information as may be appropriate must be referred to the Attorney General. Any determination by the commission or by a legislative body that a violation of legislative ethics has occurred does not preclude any criminal action relating to the violation that may be brought against the Legislator.

G. If the commission determines that a complaint filed under oath is frivolous or was filed in bad faith or if the complainant fails to appear at the hearing without being excused by the commission, the commission may order the complainant to pay to the Legislator against whom the complaint has been filed that Legislator's costs of investigation and defense, including any reasonable attorney's fees. This order is considered a final agency action, and the complainant may appeal the order pursuant to the Maine Administrative Procedure Act. If the commission determines that the complaint was filed in bad faith, the commission shall refer the case to the Attorney General for investigation.

Such an order does not preclude any other remedy available to the Legislator against whom the complaint has been filed, including, but not limited to, an action brought in Superior Court against the complainant for damages to the Legislator's reputation.

H. The commission shall file with the Clerk of the House and the Secretary of the Senate a copy of written advisory opinions and guidance issued by the commission that were formally requested by a Legislator and that were considered by the commission at a public meeting, with such deletions and changes as the commission considers necessary to protect the identity of the person seeking the opinions or others. The Clerk of the House shall keep a copy of such opinions and guidance in a special binder and shall finally publish them in the Legislative Record. The commission may exempt an opinion or a part of an opinion from release, publication or inspection if it considers such action appropriate for the protection of 3rd parties and makes available to the public an explanatory statement to that effect.

I. A copy of the commission's findings of fact and opinions regarding complaints against Legislators must also be filed with the Clerk of the House and the Secretary of the Senate. The Clerk of the House shall keep them in a special binder and shall finally publish them in the Legislative Record.

K. When a Legislator has a question or problem of an emergency nature about a possible violation of legislative ethics or an issue involving that Legislator that arises during the course of legislative action, the Legislator may request an advisory opinion from the presiding officer of the legislative body of which the Legislator is a member. The presiding officer may issue an advisory opinion. An advisory opinion issued by the presiding officer must be in accordance with the principles of this subchapter, be in writing and be reported to the commission. The commission may then issue a further opinion on the matter. The presiding officer may refer such a question or problem directly to the commission, which shall meet as soon as possible to consider the question or problem.

L. The commission shall make reasonable efforts to resolve a complaint within 90 days of its filing.

3-A. Confidentiality of Records and Proceedings Relating to Screening Complaints

Alleging a Violation of Legislative Ethics. Notwithstanding chapter 13, a complaint alleging a violation of legislative ethics is confidential and is not a public record until after the commission has voted pursuant to subsection 2, paragraph B-1 to pursue the complaint, and a commission proceeding to determine whether to pursue a complaint must be conducted in executive session. If the commission does not vote to pursue the complaint, the complaint and records relating to the investigation of that complaint remain confidential and are not public records unless the Legislator against whom the complaint is made submits a written request that the complaint and all accompanying materials be made public. This subsection does not prohibit a complainant from disclosing information that the complainant provided to the commission as part of the complaint or investigation once the commission has determined not to pursue the complaint or the investigation of a complaint is complete. This subsection does not prevent the commission from including general information about complaints in any report to the Legislature. Any person who knowingly breaches the confidentiality of a complaint investigation commits a Class D crime. This subsection does not prevent commission staff from disclosing information to a person from whom the commission is

seeking information or evidence relevant to the complaint that is necessary to investigate the complaint or prevent the complainant or the Legislator against whom the complaint is made from discussing the complaint with an attorney or other person assisting them with the complaint. The commission or commission staff shall inform any person with whom they communicate of the requirement to keep any information regarding the complaint investigation confidential.

4. Confidentiality of Records Other than Complaints. Commission records other than complaints are governed by this subsection.

A. Investigative records relating to complaints that the commission has voted to pursue are confidential unless they are provided to commission members or otherwise distributed at a public hearing of the commission.

B. Legislators' statements of sources of income are public records.

C. Findings of fact and recommendations of the commission on complaints alleging violation of legislative ethics are public records.

D. Advisory opinions of the commission and requests for advisory opinions from the commission are public records, except as provided in subsection 2, paragraph H.

5. Prohibited Communications. Communications concerning a complaint filed under this section between commission members and a complainant or between commission members and the subject of a complaint are prohibited until after the commission has voted not to pursue a complaint or the commission has taken final action on the complaint.

§ 1014. Violations of legislative ethics

1. Situations Involving Conflict of Interest. A Legislator engages in a violation of legislative ethics if that Legislator votes on a question in connection with a conflict of interest in committee or in either body of the Legislature or attempts to influence the outcome of that question unless a presiding officer in accordance with the Joint Rules of the Legislature requires a Legislator to vote or advises the Legislator that there is no conflict in accordance with section 1013, subsection 2, paragraph K. A conflict of interest includes:

A. When a Legislator or a member of the Legislator's immediate family has or acquires a direct substantial personal financial interest, distinct from that of the general public, in an enterprise that would be financially benefited by proposed legislation, or derives a direct substantial personal financial benefit from close economic association with a person known by the Legislator to have a direct financial interest in an enterprise affected by proposed legislation;

B. When a Legislator or a member of the Legislator's immediate family accepts gifts, other than campaign contributions duly recorded as required by law, from persons affected by legislation or who have an interest in an entity affected by proposed

legislation and the Legislator knows or reasonably should know that the purpose of the donor in making the gift is to influence the Legislator in the performance of the Legislator's official duties or vote or is intended as a reward for action on the Legislator's part;

C. Receiving compensation or reimbursement not authorized by law for services, advice or assistance as a Legislator;

D. Appearing for, representing or advocating on behalf of another before the Legislature, unless without compensation and for the benefit of a citizen;

E. When a Legislator or a member of the Legislator's immediate family accepts or engages in employment that could impair the Legislator's judgment, or when the Legislator knows that there is a substantial possibility that an opportunity for employment is being afforded the Legislator or a member of the Legislator's immediate family with intent to influence the performance of the Legislator's official duties, or when the Legislator or a member of his immediate family stands to derive a personal private gain or loss from employment, because of legislative action, distinct from the gain or losses of other employees or the general community; and

F. When a Legislator or a member of the Legislator's immediate family has an interest in legislation relating to a profession, trade, business or employment in which the Legislator or a member of the Legislator's immediate family is engaged and the benefit derived by the Legislator or a member of the Legislator's immediate family is unique and distinct from that of the general public or persons engaged in similar professions, trades, businesses or employment.

2-A. Undue Influence. It is a violation of legislative ethics for a Legislator to engage in conduct that constitutes the exertion of undue influence, including, but not limited to:

A. Appearing for, representing or advocating for another person in a matter before a state agency or authority, for compensation other than compensation as a Legislator, if the Legislator makes reference to that Legislator's legislative capacity, communicates with the agency or authority on legislative stationery or makes threats or implications relating to legislative action;

B. Appearing for, representing or advocating for another person in a matter before a state agency or authority if the Legislator oversees the policies of the agency or authority as a result of the Legislator's committee responsibilities, unless:

1) The appearance, representation or advocacy is provided without compensation and for the benefit of a constituent;

2) The Legislator is engaged in the conduct of the Legislator's profession and is in good standing with a licensing board, if any, that oversees the Legislator's profession;

- 3) The appearance, representation or advocacy is provided before a court or office of the judicial branch; or
- 4) The representation consists of filing records or reports or performing other routine tasks that do not involve the exercise of discretion on the part of the agency or authority; and

C. Representing or assisting another person in the sale of goods or services to the State, a state agency or a state authority, unless the transaction occurs after public notice and competitive bidding.

3. Abuse of Office or Position. It is a violation of legislative ethics for a Legislator to engage in conduct that constitutes an abuse of office or position, including but not limited to:

A. When a Legislator or a member of the Legislator’s immediate family has a direct financial interest or an interest through a close economic associate in a contract for goods or services with the State, a state agency or state authority, unless the contract is awarded through competitive bidding or is exempt from competitive bidding pursuant to state purchasing laws or the payment provisions are based on uniform rates established by the State, a state agency, a state authority or other governmental entity;

B. Granting or obtaining special privilege, exemption or preferential treatment to or for oneself or another, which privilege, exemption or treatment is not readily available to members of the general community or class to which the beneficiary belongs; and

C. Use or disclosure of confidential information obtained because of office or position for the benefit of self or another.

4. Contract with State Governmental Agency. It is a violation of legislative ethics for a Legislator or an associated organization to enter with a state agency into any contract that is to be paid in whole or in part out of governmental funds unless the contract has been awarded through a process of public notice and competitive bidding or is exempt from competitive bidding pursuant to state purchasing laws.

§ 1015. Prohibited campaign contributions and solicitations

...

3. Campaign Contributions and Solicitations Prohibited. The following provisions prohibit certain campaign contributions and solicitation of campaign contributions during a legislative session.

A. As used in this subsection, the terms “employer,” “lobbyist” and “lobbyist associate” have the same meanings as in Title 3, section 312-A. As used in this subsection, “contribution” has the same meaning as in Title 21-A, section 1012 and

includes seed money contributions as defined in Title 21-A, section 1122, subsection 9.

B. The Governor, a member of the Legislature or any constitutional officer or the staff or agent of the Governor, a member of the Legislature or any constitutional officer may not intentionally solicit or accept a contribution from a lobbyist, lobbyist associate or employer during any period of time in which the Legislature is convened before final adjournment, except for a qualifying contribution as defined under Title 21-A, section 1122, subsection 7. A lobbyist, lobbyist associate or employer may not intentionally give, offer or promise a contribution, other than a qualifying contribution, to the Governor, a member of the Legislature or any constitutional officer or the staff or agent of the Governor, a member of the Legislature or any constitutional officer during any time in which the Legislature is convened before final adjournment. These prohibitions apply to contributions directly and indirectly solicited or accepted by, or given, offered and promised to a political action committee, ballot question committee or party committee of which the Governor, a member of the Legislature, a constitutional officer or the staff or agent of these officials is a treasurer, officer or primary fund-raiser or decision maker.

C. This subsection does not apply to:

- 1) Solicitations or contributions for bona fide social events hosted for nonpartisan, charitable purposes;
- 2) Solicitations or contributions relating to a special election to fill a vacancy from the time of announcement of the election until the election; and
- 4) Solicitations or contributions accepted by a member of the Legislature supporting that member's campaign for federal office.

C-1. This subsection does not prohibit the attendance of the Governor, a member of the Legislature or any constitutional officer or the staff or agent of the Governor, a member of the Legislature or any constitutional officer at fund-raising events held by a municipal, county, state or national political party organized pursuant to Title 21-A, chapter 5, nor the advertisement of the expected presence of any such official at any such event, as long as any such official has no involvement in soliciting attendance at the event and all proceeds are paid directly to the political party organization hosting the event or a nonprofit charitable organization.

D. A person who intentionally violates this subsection is subject to a civil penalty not to exceed \$ 1,000, payable to the State and recoverable in a civil action.

Title 21-A, Maine Revised Statutes (Campaign Finance)

§ 1003. Investigations by commission

1. Investigations. The commission may undertake audits and investigations to determine whether a person has violated this chapter, chapter 14 or the rules of the commission. For this purpose, the commission may subpoena witnesses and records whether located within or without the State and take evidence under oath. A person or entity that fails to obey the lawful subpoena of the commission or to testify before it under oath must be punished by the Superior Court for contempt upon application by the Attorney General on behalf of the commission. The Attorney General may apply on behalf of the commission to the Superior Court or to a court of another state to enforce compliance with a subpoena issued to a nonresident person. Service of any subpoena issued by the commission may be accomplished by:

A. Delivering a duly executed copy of the notice to the person to be served or to a partner or to any officer or agent authorized by appointment or by law to receive service of process on behalf of that person;

B. Delivering a duly executed copy of the notice to the principal place of business in this State of the person to be served; or

C. Mailing by registered or certified mail a duly executed copy of the notice, addressed to the person to be served, to the person's principal place of business.

2. Investigations requested. A person may apply in writing to the commission requesting an investigation as described in subsection 1. The commission shall review the application and shall make the investigation if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred.

3. State Auditor. The State Auditor shall assist the commission in making investigations and in other phases of the commission's duties under this chapter, as requested by the commission, and has all necessary powers to carry out these responsibilities.

3-A. Confidential records. Investigative working papers of the commission are confidential, except that the commission may disclose them to the subject of the audit or investigation, other entities as necessary for the conduct of an audit or investigation and law enforcement and other agencies for purposes of reporting, investigating or prosecuting a criminal or civil violation. For purposes of this subsection, "investigative working papers" means documents, records and other printed or electronic information in the following limited categories that are acquired, prepared or maintained by the commission during the conduct of an audit, investigation or other enforcement matter:

A. Financial information not normally available to the public;

- B.** Information that, if disclosed, would reveal sensitive political or campaign information belonging to a party committee, political action committee, ballot question committee, candidate or candidate's political committee, or other person who is the subject of an audit, investigation or other enforcement matter, even if the information is in the possession of a vendor or 3rd party;
- C.** Information or records subject to a privilege against discovery or use as evidence; and
- D.** Intra-agency or interagency communications related to an audit or investigation, including any record of an interview, meeting or examination.

The commission may disclose investigative working papers or discuss them at a public meeting, except for the information or records subject to a privilege against discovery or use as evidence, if the information or record is materially relevant to a memorandum or interim or final report by the commission staff or a decision by the commission concerning an audit, investigation or other enforcement matter. A memorandum or report on the audit or investigation prepared by staff for the commission may be disclosed at the time it is submitted to the commission, as long as the subject of the audit or investigation has an opportunity to review it first to identify material that the subject of the audit or investigation considers privileged or confidential under some other provision of law.

4. Attorney General. Upon the request of the commission, the Attorney General shall aid in any investigation, provide advice, examine any witnesses before the commission or otherwise assist the commission in the performance of its duties. The commission shall refer any apparent violations of this chapter to the Attorney General for prosecution.

§ 1004. Violations

The violation of any of the following subsections is a Class E crime.

- 1. Contributions and expenditures.** A person, candidate, treasurer, political committee or political action committee may not knowingly make or accept any contribution or make any expenditure in violation of this chapter.
- 2. False statements.** A person, candidate, treasurer or political action committee may not make a false statement in a report required by this chapter.
- 3. Contributions in another's name.** A person may not knowingly:
 - A.** Make a contribution in the name of another person;
 - B.** Permit the person's name to be used to accomplish a contribution in violation of paragraph A; or
 - C.** Accept a contribution made by one person in the name of another person.

4. Registration; political action committees. A political action committee or ballot question committee required to be registered under section 1052-A or 1056-B may not operate in this State unless it is so registered.

§ 1004-A. Penalties

The commission may assess the following penalties in addition to the other monetary sanctions authorized in this chapter.

1. Late campaign finance report. A person that files a late campaign finance report containing no contributions or expenditures may be assessed a penalty of no more than \$100.

2. Contribution in excess of limitations. A person that accepts or makes a contribution that exceeds the limitations set out in section 1015, subsections 1 and 2 may be assessed a penalty of no more than the amount by which the contribution exceeded the limitation.

3. Contribution in name of another person. A person that makes a contribution in the name of another person, or that knowingly accepts a contribution made by one person in the name of another person, may be assessed a penalty not to exceed \$5,000.

4. Substantial misreporting. A person that files a campaign finance report that substantially misreports contributions, expenditures or other campaign activity may be assessed a penalty not to exceed \$5,000.

5. Material false statements. A person that makes a material false statement or that makes a statement that includes a material misrepresentation in a document that is required to be submitted to the commission, or that is submitted in response to a request by the commission, may be assessed a penalty not to exceed \$5,000.

When the commission has reason to believe that a violation has occurred, the commission shall provide written notice to the candidate, party committee, political action committee, committee treasurer or other respondent and shall afford them an opportunity to appear before the commission before assessing any penalty. In determining any penalty under subsections 3, 4 and 5, the commission shall consider, among other things, the level of intent to mislead, the penalty necessary to deter similar misconduct in the future and the harm suffered by the public from the incorrect disclosure. A final determination by the commission may be appealed to the Superior Court in accordance with Title 5, chapter 375, subchapter 7 and the Maine Rules of Civil Procedure Rule 80C.

Penalties assessed pursuant to this section that have not been paid in full within 30 days after issuance of a notice of the final determination may be enforced in accordance with section 1004-B.

§ 1011. Application

This subchapter applies to candidates for all state and county offices and to campaigns for their nomination and election. Candidates for municipal office as described in Title 30-A, section 2502, subsection 1 are also governed by this subchapter. The commission does not have jurisdiction over financial activities to influence the nomination or election of candidates for federal office.

...

§ 1015. Limitations on contributions and expenditures

...

4. Political committees; intermediaries. For the purpose of the limitations imposed by this section, contributions made to any political committee authorized by a candidate to accept contributions on the candidate's behalf are considered to be contributions made to that candidate. If the campaign activities of a political action committee within a calendar year primarily promote or support the nomination or election of a single candidate, contributions to the committee that were solicited by the candidate are considered to be contributions made to the candidate for purposes of the limitations in this section. For purposes of this subsection, solicitation of contributions includes but is not limited to the candidate's appearing at a fundraising event organized by or on behalf of the political action committee or suggesting that a donor make a contribution to that committee.

For the purposes of the limitations imposed by this section, all contributions made by a person, either directly or indirectly, on behalf of a particular candidate, that are in any way earmarked or otherwise directed through an intermediary or conduit to the candidate are considered to be contributions from that person to the candidate. The intermediary or conduit shall report the original source and the intended recipient of the contribution to the commission and to the intended recipient.

...

CMR 94-270-001

94 270 001. PROCEDURES

SECTION 4. INITIATION OF PROCEEDINGS

1. Legislative Ethics. The Commission is authorized to investigate and make advisory recommendations to either House of the Maine Legislature concerning legislative conflicts of interest or any breach of the legislative ethics set forth in 1 M.R.S.A. §§ 1001 - 1023. The Commission's opinion may be sought by three methods, or the Commission may act on its own motion.

A. Legislator's Own Conduct

(1) A Legislator seeking an advisory opinion with respect to his or her own circumstances or conduct should make a written request for an opinion, setting forth the pertinent facts with respect to the legislative matter at issue and the circumstances of the Legislator giving rise to the inquiry.

(2) The request will be officially filed only when received at the offices of the Commission. The Director will promptly send a copy of the request to the Chair, and the matter will be placed on the agenda for the next Commission meeting, or if necessary, at a special meeting.

(3) An oral request by a Legislator for an opinion with respect to his or her own circumstances will not be considered an official request for an advisory opinion, and a Legislator making such a request will be so notified, by letter, and encouraged to file a written request.

B. Complaints. Any written complaint will be included in the agenda of the next Commission meeting.

(1) Complaint by a Legislator. Copies of any sworn complaint filed by a Legislator will promptly be sent to the Legislator against whom the complaint has been lodged and to the Commission Chair, in each case identifying the Legislator making the complaint. A complaint invokes the Commission's authority only if made under oath and only if it addresses an alleged conflict of interest relating to circumstances arising during the term of the legislature then in office.

(2) Other Complaints

(a) The Director will review each complaint to determine whether the matter relates to the Commission's statutory mandate. When a complaint is filed, the Director, in consultation with Commission Counsel, will review the matter to determine whether the complaint has sufficient merit to warrant recommending the calling of a meeting. When a meeting is called, the Commission will determine in executive session whether to hear the

complaint. If the nature of the complaint clearly does not fall within the scope of the Commission's jurisdiction, the Director will so notify the complainant by letter within 14 days of receiving the complaint. In such cases, the respondent need not be notified. The Commission may reverse any administrative decision.

(b) An oral complaint by any person alleging a conflict of interest concerning any legislator does not constitute a complaint under 1 M.R.S.A. §1013(2)(B), and a person registering such a complaint will be so notified, by letter.

C. Referral by Presiding Officer. When a Legislator has requested an advisory opinion from the Presiding Officer of the House of which he/she is a member, and the Presiding Officer has referred the inquiry directly to the Commission, the Director will arrange a meeting of the Commission as soon as possible to consider the question.

2. Election Campaign Reporting and Maine Clean Election Act Violations

A. Compliance Review. The Commission staff will review all campaign finance reports filed by candidates pursuant to 21-A M.R.S.A., chapters 13 and 14 to verify compliance with the financial disclosure and documentation requirements set by statute or rule. The staff will review a selection of other campaign finance reports filed by non-candidate committees with the Commission for compliance with legal requirements. Notice of any omission, error, or violation will be given to the filer by electronic mail or U.S. Mail. The Commission staff will establish a reasonable time period for the filer to remedy any omission or error. The Commission staff shall schedule any substantial violations for possible action by the Commissioners at a public meeting. If the filer fails to remedy minor violations, the Commission staff will use its discretion whether to take any further action. Minor violations include, but are not limited to, failing to report the employment information for a contributor or misusing an expenditure code to describe the purpose of an expenditure.

B. Late Reports and Registrations. Where required by statute, notice of failure to file a required report will be timely sent by Commission staff. When a report or registration is filed late, the Director's recommendations will be based on the following considerations:

- (1) Lateness of report or registration,
- (2) Reason for lateness,
- (3) Kind of report (more stringent application for pre-election reports),
- (4) Amount of campaign funds not properly reported,
- (5) Previous record of the filer; and

(6) Good faith effort of the filer to remedy the matter.

C. Any person (as defined in 21-A M.R.S.A. §1001) may make an official complaint or request for a Commission investigation by filing a signed written request at the Commission's office, setting forth such facts with sufficient details as are necessary to specify the alleged violation. A copy of the signed request may be filed by facsimile or by electronic mail, provided that the original signed request is submitted to the Commission. Statements should be made upon personal knowledge. Statements which are not based upon personal knowledge must identify the source of the information which is the basis for the request, so that respondents and Commission staff may adequately respond to the request. A copy of any such written request will be promptly mailed to the candidate or organization alleged to have violated the statutory requirements. The Director may conduct preliminary fact finding to prepare a matter for presentation to the Commission. The Director, in consultation with Counsel, will prepare a summary of staff findings and recommendations for inclusion on the agenda.

D. An oral report of a violation, or a written request containing insufficient detail to specify the violation charged, does not constitute an official request for a Commission determination, and a person registering such a complaint will be so notified.

E. The signature of a person authorized to sign a report or form constitutes certification by that person of the completeness and accuracy of the information reported. The use of a password in filing an electronic report constitutes certification of the completeness and accuracy of the report.

SECTION 5. FACT FINDING AND INVESTIGATIONS

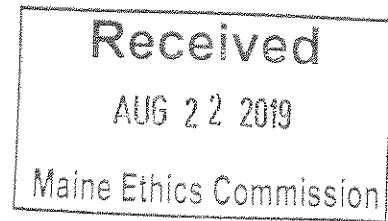
1. Before Commission Meeting. With respect to any inquiry, complaint, or request for Commission action properly filed in accordance with the preceding section, or any potential violation that comes to the attention of Commission staff through an audit or review of reports, the Director may conduct such preliminary investigation as is deemed prudent and desirable. If the preliminary investigation suggests that a complaint is without factual basis, the Director may inquire with the person filing the complaint whether he wishes to withdraw the request for further investigation. When a matter is ready for presentation to the Commission, the Director, in consultation with Counsel, will prepare a summary of findings and recommendations for inclusion on the agenda.

2. By the Commission. Once any matter is reached on the agenda of a Commission meeting, the Commission will control any further investigation or proceedings. No hearings will be held except by direction of the Commission. On a case-by-case basis, the Commission may authorize its Chair, Director, or any ad hoc committee of its members, to conduct further investigative proceedings on behalf of the Commission between Commission meetings. Any authorization so conferred will be fully reflected in the minutes of the Commission meeting. Consultations between the Commission

and its Counsel concerning an investigation (including the issuance of subpoenas) where premature public knowledge of the investigation would place the Commission or another investigatory office at a substantial disadvantage may be held in executive session pursuant to 1 M.R.S.A. §§ 405(6)(E), 1005, and 1013(3-A).

3. Use of Commission's Subpoena Power. The Chair is authorized to issue subpoenas in the name of the Commission to compel the attendance of witnesses or the production of records, documents or other evidence when the Chair and the Commission's Counsel are in agreement that the testimony or evidence sought by the subpoena is necessary to disposition of the matter; and to issue any subpoena in the name of the Commission on behalf of any person having a statutory right to an agency subpoena. Any oral testimony compelled by a subpoena issued by this provision will be presented to the Commission or its staff.

4. Hearings. The Commission may hold a hearing to receive testimony under oath. Any hearing must be conducted in accordance with the Maine Administrative Procedure Act [5 M.R.S.A. §§ 8001 et seq.] and Chapter 2 of the Commission's Rules.



August 20, 2019

Mr. Jonathan Wayne
Executive Director
Maine Commission on Governmental Ethics and Election Practices
135 State House Station
Augusta, ME 04333

Re: Request for Investigation Into Apparent Campaign Finance and Legislative Ethics Code Violations by Sara Gideon and Gideon Leadership PAC

Dear Mr. Wayne:

In light of Sara Gideon's recent admission that she and her leadership PAC, Gideon Leadership PAC, violated campaign finance law, I write to request the Commission conduct a full and prompt investigation into the matters described in further detail below.

First, Gideon and her PAC have admitted to operating an unlawful giving-in-the-name-of-another scheme in direct violation of Me. Rev. Stat. tit. 21-A, § 1004 and of federal law through which Sara Gideon knowingly made multiple contributions to both federal and Maine political committees with her personal funds that were reimbursed by the PAC. Gideon's admission is substantiated by state and federal campaign finance filings.

Second, there is reason to believe that Gideon's PAC also violated federal campaign finance law by failing to register and report with the Federal Election Commission ("FEC") even though the group's contributions to federal candidates far exceeded the registration threshold. There is also reason to believe Gideon Leadership PAC violated federal campaign finance law by failing to segregate the thousands of dollars it raised from corporations from the funds it used to contribute to federal candidates.

Taken together, these violations of both state and federal law, described in greater detail below, demonstrate Gideon's blatant disregard for the law and for the "high moral and ethical standards" required by the Legislative Code of Ethics. Therefore, I respectfully request that the Commission undertake an immediate investigation of this activity pursuant to Me. Rev. Stat. tit. 21-A, §§ 1003(1) and (2) and 94-270 C.M.R. ch. 1 § 4(2)(C).

FACTS

As federal and state campaign finance disclosures reveal, Sara Gideon contributed personal funds totaling at least \$2,750 to a federal candidate committee (Emily Cain for Congress) and to the federal account of a state party committee (the Maine Democratic Party) and at least \$500 to Maine political committees (Golden Leadership Fund and House Democratic Campaign Committee). They also show that Gideon Leadership PAC, whose principal officer and decision-maker was Sara Gideon¹, immediately reimbursed Gideon for those contributions.

¹ During the time period that Gideon and the PAC engaged in the giving-in-the-name-of-another conduit-contribution scheme described in this letter, Gideon served as a principal officer of the PAC. By law, the principal

Specifically, on September 30, 2015, Cain for Congress, the federal campaign committee of Emily Cain, reported the receipt of a \$1,000 contribution from Sara I. Gideon of Freeport, Maine. Approximately one month later, on October 28, 2015, Gideon Leadership PAC, reported a \$1,000 disbursement to Sara Gideon with the description “Reimbursement for Federal Contribution.” *See* Exhibit B.

On June 13, 2016, Cain for Congress reported the receipt of an additional \$250 contribution from Sara I. Gideon of Freeport, Maine. The same month Gideon Leadership PAC reported a \$250 disbursement described as “Contribution – Reimbursement to Sara Gideon.” *See* Exhibit C.

On June 1, 2016, Gideon Leadership PAC reported a \$250 disbursement purportedly to the House Democratic Campaign Committee but described as “Contribution – Reimbursement to Sara Gideon.” On August 3, 2016, the House Democratic Campaign Committee reported receiving a \$250 individual contribution from Sara Gideon of Freeport, Maine. While HDCC also reports receiving two additional contributions directly from Gideon Leadership PAC in 2016, those contributions correspond to disclosures by Gideon Leadership PAC’s that also report contributions directly to HDCC. Therefore, the \$250 contribution on June 1 appears to have been correctly reported by the HDCC as an individual contribution from Sara Gideon, which was reimbursed by Gideon Leadership PAC in a blatant violation of Maine’s prohibition on giving in another’s name. *See* Exhibit D.

On June 25, 2016, Golden Leadership Fund reported receiving a \$250 individual contribution from Sara Gideon. On June 27, 2016, Gideon Leadership PAC disclosed a \$250 disbursement purportedly to the Golden Leadership Fund but described as “Contribution – Reimbursement to Sara Gideon.” Although Golden Leadership Fund received another direct contribution from Gideon Leadership PAC in 2015, that contribution corresponds to a parallel disclosure on Gideon Leadership PAC’s reports for a direct contribution to Golden Leadership Fund. Therefore, it appears that Golden Leadership Fund correctly reported the \$250 contribution received on June 25, 2016 as an individual contribution from Sara Gideon and that Sara Gideon was reimbursed by Gideon Leadership PAC in a blatant violation of Maine’s prohibition on giving in another’s name. *See* Exhibit E.

On July 11, 2016, the Maine Democratic Party’s FEC Report discloses the receipt of a \$1,000 contribution into its federal account from Sara I. Gideon of Freeport, Maine. Just days later on July 25, 2016, Gideon Leadership PAC reports disbursing \$1,000 to Sara Gideon described as “Reimbursement for MDP Contribution.” *See* Exhibit F.

officer is responsible for ensuring the committee’s compliance with the state campaign finance laws, including filing complete and accurate reports. *See* Me. Rev. Stat. tit. 21-A, § 1054-A. In addition, Gideon was a primary decision-maker of the committee and signed an acknowledgement that she is “deemed to have participated in any spending decisions of the committee.” *See* Exhibit A (Acknowledgment of Responsibilities--- Decision-Maker and 2014 Registration of Gideon Leadership PAC).

On October 3, 2016, the Maine Democratic Party’s FEC Report discloses the receipt of a \$500 contribution into its federal account from Sara I. Gideon of Freeport, Maine. On October 12, 2016, Gideon Leadership PAC reported a \$500 disbursement to Sara Gideon described as “Reimbursement for Contribution.” See Exhibit G.

Gideon has acknowledged that this scheme violated the law and that she has written a personal check to the U.S. treasury to “offset the contributions” for \$3,250. See Sara Gideon ran afoul of election law with political donations in 2015 and 2016, *Bangor Daily News*, Aug. 1, 2019, available here: <https://bangordailynews.com/2019/08/01/politics/sara-gideon-ran-afoul-of-federal-election-law-with-political-donations-in-2015-and-2016/>; see also Gideon Campaign Says Error Led to Campaign Finance Violation, *Portland Press Herald*, Aug. 1, 2019 available here: <https://www.pressherald.com/2019/08/01/records-show-gideon-violated-federal-campaign-finance-law/>. Since the reimbursed federal contributions total \$2,750, I presume that Gideon’s personal check for \$500 more than that amount—the exact amount of the two \$250 reimbursed contributions to Maine political committees—is an acknowledgement by Gideon that she received reimbursements for contributions to state committees in violation of state law.

In 2016, the PAC also made direct contributions to federal candidates including a \$250 contribution on March 14, 2016 to Pingree for Congress and a \$750 contribution on August 21, 2016 to Cain for Congress. See Exhibit H. These direct contributions, combined with Gideon’s reimbursed contributions to federal candidates in 2016, total \$2,750. Although federal law requires a group that makes contributions or expenditures in excess of \$1,000 in a calendar year to register and report with the FEC, Gideon Leadership PAC has never filed the appropriate disclosures with the FEC. Moreover, there is nothing on the public record that confirms the PAC segregated the thousands of dollars in corporate funds it raised to ensure they were not comingled with other funds used to contribute to federal candidates and committees, as required of PACs registered under federal law.

LEGAL ANALYSIS

Maine law explicitly prohibits contributions in another’s name. Accordingly, a “person may not knowingly:

- A. Make a contribution in the name of another person;
- B. Permit the person's name to be used to accomplish a contribution in violation of paragraph A; or
- C. Accept a contribution made by one person in the name of another person.”

Me. Rev. Stat. tit. 21-A, § 1004.

The Maine Ethics Commission website notes that “[n]o person may make a contribution in the name of another person or knowingly permit his name to be used to accomplish such a contribution...The contributor identified in reports submitted to the Ethics Commission *must be the actual source of funds for the contribution*. Violating this restriction is a Class E crime and

may subject the violator to civil penalties.” <https://www.maine.gov/ethics/guide/contanother.htm> (emphasis added).

Gideon has now admitted that she engaged in this unlawful scheme. When confronted by the Bangor Daily News about the contributions, a Gideon spokesperson conceded that the committee “was given incorrect guidance on how to process the contributions.” Sara Gideon ran afoul of election law with political donations in 2015 and 2016, *Bangor Daily News*, Aug. 1, 2019, available here: <https://bangordailynews.com/2019/08/01/politics/sara-gideon-ran-afoul-of-federal-election-law-with-political-donations-in-2015-and-2016/>. In addition, the PAC’s own descriptions of the disbursements outlined above refer to them as a “reimbursement” for contributions. As such, there can be no question that the PAC and not Sara Gideon was the true contributor to committees in question and that Gideon Leadership PAC made a contribution in the name of another, Sara Gideon, in direct violation of the giving in another’s name prohibition at Me. Rev. Stat. tit. 21-A, § 1004(3)(A). In addition, as Principal Officer of the PAC, Sara Gideon permitted her name to be used to accomplish this direct violation of Me. Rev. Stat. tit. 21-A, § 1004(3)(B). As a result, Gideon Leadership PAC failed to report the actual source of funds for the contributions and caused the state committees in question to file false reports with the Commission.

Moreover, there can be no doubt that Sara Gideon was a knowing and central participant in all aspects of this scheme. Gideon made the contributions with her personal funds as disclosed by the recipient committees. She then caused the state PAC to issue a reimbursement to herself—a check she presumably endorsed and deposited into her personal bank account. In fact, as the principal officer and decision-maker of Gideon Leadership PAC, Gideon was deemed by law “to have participated in any spending decisions of the committee.” Moreover, as a principal officer of the PAC, Gideon was responsible for the accuracy of the PAC’s disclosure reports and had a duty to review the PAC’s disclosures to ensure that they accurately described its activities. Gideon therefore knowingly participated in both sides of the transactions under this unlawful conduit-contribution scheme to give funds in the name of another.

In addition to violating federal and state laws that prohibit giving in another’s name, this scheme also resulted in violations by Gideon Leadership PAC of two additional provisions of federal law. First, federal regulations require that a state PAC such as Gideon Leadership PAC register with the FEC as a federal political committee and report once it has made contributions in excess of \$1,000 in a calendar year to a federal candidate and/or federal party committee. *See* 11 C.F.R. §§100.5(a) and 102.1(d). As established above, Gideon Leadership PAC’s federal election activity was almost triple the registration threshold. It therefore should have registered and reported to the FEC beginning in July 2016. Yet FEC records indicate that the PAC has never registered as a federal committee or filed reports as required by law.

Indeed, the conduit-contribution scheme appears to have been a deliberate end-run by Gideon and her PAC around this federal registration and disclosure requirement since the PAC was careful to keep its direct federal contributions at exactly \$1,000, precisely one cent beneath the registration threshold in 2016. However, when the reimbursed contributions made that year are aggregated with the amount of the PAC’s direct federal contributions, the total far exceeds \$1,000, the trigger for registration as a federal committee.

Moreover, there is no evidence on the public record to indicate that the PAC established a separate fund into which it segregated federally permissible funds from the thousands of dollars in corporate funds that it also accepted, as required by federal law. *See* 11 C.F.R. §102.5(i), (ii) During the time of the conduit-contribution scheme, the PAC had collected only \$20,150 from individuals (federally permissible sources) while it had raised almost four times that amount from federally impermissible sources (\$57,500 in corporate contributions and \$17,000 from other Maine political action committees).² Federal campaign finance regulations require that a committee participating in both state and federal elections thus triggering registration at the federal level must establish a separate account into which it deposits federally permissible funds (e.g., individual contributions within the \$5,000 limit) so that the account is not tainted by funds from federally impermissible sources such as those from corporations or other PACs that may accept corporate contributions. *See* 11 C.F.R. §102.5(i), (ii). Corporations, such as those that contributed to Gideon Leadership PAC, are prohibited from contributing to a federal political committee.³ *See* 52 U.S.C. §30118. Therefore, there is reason to believe that both the direct and reimbursed contributions by Gideon Leadership PAC to federal committees were made with funds that were not properly segregated but were instead comingled with impermissible corporate funds.

The Campaign Legal Center, a national campaign finance watchdog group, has expressed concern about this issue. Speaking to the press regarding Gideon's reimbursed contributions, Erin Choplak, CLC's director of campaign finance strategy, noted that "[c]orporations cannot make contributions to a federal campaign, and you can't circumvent that ban by using a straw donor to funnel money originally from a company to a federal candidate." *See* Collins Challenger Used PAC to Reimburse Own Contributions, *Washington Free Beacon*, Aug. 1, 2019, and available here: <https://freebeacon.com/politics/collins-challenger-used-pac-to-reimburse-own-contributions/>.

I have notified the FEC of these violations in the attached complaint. *See* Exhibit I. Although I understand that the Maine Ethics Commission does not have jurisdiction over violations of federal law, in light of the Maine Ethics Commission's duty to investigate apparent legislative ethics violations pursuant to Me. Rev. Stat. tit. 1, §1008, I urge the Commission to evaluate whether Gideon's use of her state PAC to violate federal law conforms with the Legislative Code of Ethics that requires legislators to abide by "high moral and ethical standards." Legislative Code of Ethics as adopted by the 100th Legislature and as amended by the 127th Legislature, available here: <http://legislature.maine.gov/house/house/Documents/LegislativeCode>. Gideon's repeated and blatant violations of both state and federal law are more than a mere violation of a technical legal requirement. Instead, they demonstrate a disdain for transparency and the basic requirements of campaign finance law. At bottom, Gideon put her desire to line her own pockets over the need to comply with the law. This pattern of behavior by Sara Gideon does not reflect the type of

² *See* Gideon Leadership PAC filings: <https://mainecampaignfinance.com/#/exploreCommitteeDetail/4851>.

³ This prohibition excepts contributions to independent expenditure-only committees known as Super PACs.

“responsible conduct inside and outside of the State House” that the Legislative Code of Ethics requires of our state’s legislators.

CONCLUSION

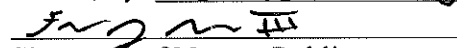
Based on the foregoing, it is plain that Sara Gideon and her leadership PAC blatantly, deliberately, and repeatedly violated multiple provisions of federal and state law and failed to uphold the standards of ethical conduct required by the Legislative Code of Ethics. To recap, Gideon knowingly made multiple political contributions in the name of another (Gideon Leadership PAC), knowingly approved disclosures by her leadership PAC to the Commission that failed to report that PAC as the true source of the contributions, and knowingly caused the recipients of those contributions to file false reports with the Commission and the FEC regarding the true source of the funds. Further, Gideon appears to have purposefully evaded the requirements of federal campaign finance law that required her PAC to register as a federal committee and to segregate its corporate funds from those it used to support federal candidates. Therefore, the Commission should conduct an immediate investigation into these matters, including whether Gideon’s evasion of state and federal law violates the Legislative Code of Ethics. If so, the Commission should seek sanctions and penalties to the fullest extent of the law against Sara Gideon and Gideon Leadership PAC for any and all violations.

Respectfully submitted,



Edward Youngblood
735 North Main Street
Brewer, ME 04412

Subscribed and sworn to before me this 22nd day of August 2019, at Augusta,
Maine, by: Edward M. Youngblood



Signature of Notary Public

Name of Notary Public Francis J. Reese III

Notary Public, State of Maine

My commission expires: _____

Francis J Reese III
Notary Public, State of Maine
My Commission Expires: June 5th, 2025

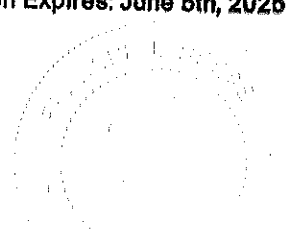


EXHIBIT A



ACKNOWLEDGMENT OF RESPONSIBILITIES — DECISION-MAKER

I, (print name) Sara Gidon, acknowledge that I am a decision-maker of Gidon Leadership PAC, a political action committee registered with the Commission on Governmental Ethics and Election Practices (the "Commission"). I acknowledge that, as a decision-maker of the committee:

(1) I am deemed to have participated in any spending decisions of the committee until the Commission has received notice of my resignation or involuntary removal from the committee.

(2) I am responsible for notifying the Commission and the committee in writing if I resign from the position of decision-maker and that my resignation will not be effective until the Commission receives such notice.

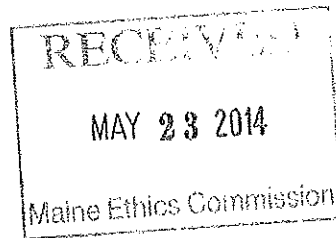
I have read this acknowledgment and understand my responsibilities as a decision-maker.

5/21/14

Signature

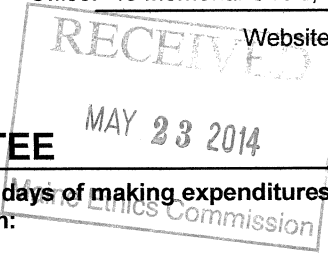
Date

Failure to submit the Acknowledgment of Responsibilities may result in a fine of \$100.





COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES
 Mail: 135 State House Station, Augusta, Maine 04333
 Office: 45 Memorial Circle, 2nd floor, Augusta, Maine



Website: www.maine.gov/ethics
 Phone: 207-287-4179
 Fax: 207-287-6775

REGISTRATION: POLITICAL ACTION COMMITTEE

A political action committee must register with the Commission within 7 days of making expenditures to initiate or influence a campaign or election, including unpaid obligations, that total more than:

- \$1,500 for an organization whose major purpose is to influence candidate or ballot question elections, or
- \$5,000 for organizations which participate in candidate elections but whose major purpose is something other than influencing candidate elections.

Registration is not complete until the following additional documents have been submitted:

Initial Campaign Finance Report. All contributions received, whether cash or in-kind, and all expenditures made from the beginning of the calendar year must be reported. Be sure to include any expenditures associated with the collection of signatures, paid staff time, travel reimbursement, and fundraising.

Acknowledgement of Responsibilities. The Treasurer, Principal Officer and any Decision-Makers must sign and return the statement within 10 days of the date of this registration.

Check here if this an amendment

COMMITTEE INFORMATION	
Committee name <i>Gideon Leadership PAC</i>	Acronym <i>GLP</i>
Mailing address <i>37 South Freeport Road</i>	Phone <i>207.865.9593</i>
City, zip code <i>Freeport 04032</i>	Fax
E-mail <i>saraigideon@gmail.com</i>	Website
ALTERNATE E-MAIL ADDRESSES	
To receive filing reminders and important information from the Commission. These addresses will not be posted online.	
1.	2.
TREASURER INFORMATION	
Cannot be the same as the Principal Officer. See Acknowledgement of Responsibilities for duties of Treasurer.	
Name <i>Jay Nothing</i>	Primary Phone - For Commission Use Only <i>same</i>
Mailing address <i>PO Box 5307</i>	Public Phone <i>207.622.7432</i>
City, zip code <i>Augusta 04332</i>	E-mail
PRINCIPAL OFFICER INFORMATION	
Cannot be the same as the Treasurer. See Acknowledgement of Responsibilities for duties of Principal Officer.	
Name <i>Sara Gideon</i>	Phone <i>207.865.9593</i>
Mailing address <i>37 South Freeport Road</i>	
City, zip code <i>Freeport 04032</i>	E-mail <i>saraigideon@gmail.com</i>

DECISION-MAKERS

List all persons, other than the Treasurer or Principal Officer, primarily responsible for making decisions for the PAC.

There are no Decision-Makers other than the Treasurer and Principal Officer.

Name		Primary Phone - For Commission Use Only
Mailing address		Public Phone
City, state, zip code	E-mail	

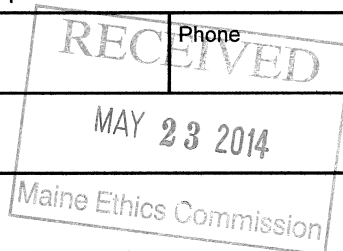
Name		Primary Phone - For Commission Use Only
Mailing address		Public Phone
City, state, zip code	E-mail	

FUNDRAISERS

List all persons, other than the Treasurer or Principal Officer, primarily responsible for fundraising for the PAC.

There are no Primary Fundraisers other than the Treasurer and Principal Officer.

Name		Phone
Mailing address		
City, state, zip code	E-mail	



Name		Phone
Mailing address		
City, state, zip code	E-mail	

LEGISLATORS OR CANDIDATES WITH SIGNIFICANT ROLE IN PAC

List all Candidates or Legislators with a significant fundraising or decision-making role with the PAC.

No Candidates or Legislators have a significant fundraising or decision-making role with the PAC.

Name and office sought/held <i>Sara Gideon / State Rep</i>		Phone <i>207-865-9597</i>
Mailing address <i>same</i>		
City, state, zip code	E-mail	

Name and office sought/held		Phone
Mailing Address		
City, state, zip code	E-mail	

FORM OF ORGANIZATION

Name the form or structure of organization, i.e., for-profit or non-profit corporation, voluntary association, partnership, membership organization, etc.

Form of organization

voluntary ass'n

Date of origin/incorporation

SPONSOR ORGANIZATIONS

List all for-profit or non-profit corporations or other organizations that formed this committee. Use additional sheets as necessary.

This committee was not formed by a for-profit or non-profit corporation or other organization.

Name

Mailing address, city, state, zip code

Name

Mailing address, city, state, zip code

CAMPAIGN ACCOUNT INFORMATION

For the account into which contributions will be deposited and from which expenditures will be made.

Name of financial institution

Kennebec Savings Bank

Mailing address, city, state, zip code

150 State Street Augusta ME 04332

Name of account

Gideon Leadership PAC

STATEMENT OF SUPPORT OR OPPOSITION

The committee must list the specific candidates or categories of candidates, referenda, initiated petitions, people's vetoes, or other campaigns that the committee supports or opposes. If the committee is formed to influence the election of a single candidate, the name of the candidate must be listed.

Support

Democratic candidates & issues

Oppose

SIGNATURE OF PRINCIPAL OFFICER OR TREASURER

The Treasurer, Principal Officer and any Decision-Makers must submit a signed Acknowledgement of Responsibilities.

Signature

Title

Principal Officer

Print name

Sara Gideon

Date

5/21/14

EXHIBIT B

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 78 OF 272
	<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
	<input type="checkbox"/> 12	<input type="checkbox"/> 13a
	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
		<input type="checkbox"/> 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Cain for Congress

A. Full Name (Last, First, Middle Initial)
Sara I Gideon

Mailing Address 37 S Freeport Rd

City Freeport State ME Zip Code 04032-6100

FEC ID number of contributing federal political committee. **C**

Name of Employer State of Maine Occupation State Representative

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date
1000.00

Date of Receipt
M M / D D / Y Y Y Y
09 / 30 / 2015

Transaction ID : VNVT5E10X81

Amount of Each Receipt this Period
1000.00

* Earmarked Contribution: See Below

B. Full Name (Last, First, Middle Initial)
ACTBLUE

Mailing Address PO Box 382110

City Cambridge State MA Zip Code 02238-2110

FEC ID number of contributing federal political committee. **C** C00401224

Name of Employer Occupation Conduit total listed in Agg. field

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date
84256.47

Date of Receipt
M M / D D / Y Y Y Y
09 / 30 / 2015

Transaction ID : VNVT5E10X81E

Amount of Each Receipt this Period
1000.00

[MEMO ITEM]
Note: Above Contribution earmarked through this organization.

C. Full Name (Last, First, Middle Initial)
Beatrice Gilbert

Mailing Address 42 Town Farm Road

City North Yarmouth State ME Zip Code 04097

FEC ID number of contributing federal political committee. **C**

Name of Employer Self-employed Occupation Artist

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date
500.00

Date of Receipt
M M / D D / Y Y Y Y
07 / 15 / 2015

Transaction ID : VNVT5E14BH7

Amount of Each Receipt this Period
500.00

* Earmarked Contribution: See Below

SUBTOTAL of Receipts This Page (optional).....

TOTAL This Period (last page this line number only).....

1500.00



2015 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 622-7432 EMAIL: JNUTTING@VERRILLDANA.COM	
REPORT	DUE DATE	REPORTING PERIOD	
JANUARY QUARTERLY	01/15/2016	10/01/2015 - 12/31/2015	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$30,310.00	\$45,285.00
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)	\$30,310.00	\$45,285.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$6,739.39	\$10,710.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$6,739.39	\$10,710.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$18,362.99	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$30,310.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$6,739.39	
12. CASH BALANCE AT END OF PERIOD	\$41,933.60	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 01/15/2016
 LAST MODIFIED: 01/15/2016
 PRINTED: 06/30/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/5/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR TRAVEL EXPENSES	TRV	\$624.20
10/11/2015	ACT BLUE PO BOX 441146 SOMERVILLE, MA 02144	PROCESSING FEES	OTH	\$71.12
10/28/2015	EMPOWERING MAINE LEADERSHIP PAC 110 SEWALL STREET AUGUSTA, ME 04330	CONTRIBUTION	CON	\$250.00
10/28/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR FEDERAL CONTRIBUTION	OTH	\$1,000.00
10/28/2015	GOLDEN LEADERSHIP FUND PO BOX 5307 AUGUSTA, ME 04332	CONTRIBUTION	CON	\$250.00
11/3/2015	DANDELION CATERING 81 BRIDGE ST YARMOUTH, ME 04096	FOOD	FOD	\$899.37
11/5/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENTS FOR TRAVEL - HOTEL	TRV	\$3,644.70
TOTAL OPERATING EXPENDITURES				\$6,739.39

EXHIBIT C

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 151 OF 484
	<input checked="" type="checkbox"/> 11a <input type="checkbox"/> 11b <input type="checkbox"/> 11c <input type="checkbox"/> 11d	
	<input type="checkbox"/> 12 <input type="checkbox"/> 13a <input type="checkbox"/> 13b <input type="checkbox"/> 14 <input type="checkbox"/> 15	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Cain for Congress

A. Full Name (Last, First, Middle Initial)
John Gibson

Mailing Address **6 Choate Ln**

City **Hallowell** State **ME** Zip Code **04347-1706**

FEC ID number of contributing federal political committee. **C**

Name of Employer **Not employed** Occupation **Not employed**

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date
295.00

Date of Receipt
M M / D D / Y Y Y Y
06 / 30 / 2016

Transaction ID : **VNVT5EFJFH0**

Amount of Each Receipt this Period
35.00

Memo Item

* Earmarked Contribution: See Below

B. Full Name (Last, First, Middle Initial)
ACTBLUE

Mailing Address **PO Box 382110**

City **Cambridge** State **MA** Zip Code **02238-2110**

FEC ID number of contributing federal political committee. **C C00401224**

Name of Employer Occupation
Conduit total listed in Agg. field

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date
143346.09

Date of Receipt
M M / D D / Y Y Y Y
06 / 30 / 2016

Transaction ID : **VNVT5EFJFH0E**

Amount of Each Receipt this Period
35.00

* Memo Item

Note: Above Contribution earmarked through this organization.

C. Full Name (Last, First, Middle Initial)
Sara I Gideon

Mailing Address **37 S Freeport Rd**

City **Freeport** State **ME** Zip Code **04032-6100**

FEC ID number of contributing federal political committee. **C**

Name of Employer **State of Maine** Occupation **State Representative**

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date
1400.00

Date of Receipt
M M / D D / Y Y Y Y
06 / 13 / 2016

Transaction ID : **VNVT5EEQZN5**

Amount of Each Receipt this Period
250.00

Memo Item

* Earmarked Contribution: See Below

SUBTOTAL of Receipts This Page (optional).....

TOTAL This Period (last page this line number only).....

285.00



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

2016 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
42-DAY POST-PRIMARY REPORT	07/26/2016	06/01/2016 - 07/19/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$19,050.00	\$19,050.00
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)	\$19,050.00	\$19,050.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$2,625.00	\$2,625.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$1,245.11	\$3,574.68
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$3,870.11	\$6,199.68
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$39,604.03	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$19,050.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$3,870.11	
12. CASH BALANCE AT END OF PERIOD	\$54,783.92	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 07/26/2016
 LAST MODIFIED: 02/06/2017
 PRINTED: 06/29/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
6/1/2016	EMILY CAIN FOR CONGRESS PO BOX 1523 BANGOR, ME 04402	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	FND	\$250.00
6/1/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00
6/21/2016	FIRE AND CO. 102 YORK ST KENNEBUNKPORT, ME 04043	FOOD FOR EVENT	FOD	\$310.00
6/21/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR FUNDRAISING EXPENSES	FND	\$155.48
6/27/2016	GOLDEN LEADERSHIP FUND PO BOX 5307 AUGUSTA, ME 04332	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00
7/19/2016	ACT BLUE PO BOX 441146 SOMERVILLE, MA 02144	FEE	OTH	\$29.63
TOTAL OPERATING EXPENDITURES				\$1,245.11

EXHIBIT D



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

2016 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
42-DAY POST-PRIMARY REPORT	07/26/2016	06/01/2016 - 07/19/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$19,050.00	\$19,050.00
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)	\$19,050.00	\$19,050.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$2,625.00	\$2,625.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$1,245.11	\$3,574.68
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$3,870.11	\$6,199.68
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$39,604.03	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$19,050.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$3,870.11	
12. CASH BALANCE AT END OF PERIOD	\$54,783.92	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 07/26/2016
 LAST MODIFIED: 02/06/2017
 PRINTED: 06/29/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
6/1/2016	EMILY CAIN FOR CONGRESS PO BOX 1523 BANGOR, ME 04402	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	FND	\$250.00
6/1/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00
6/21/2016	FIRE AND CO. 102 YORK ST KENNEBUNKPORT, ME 04043	FOOD FOR EVENT	FOD	\$310.00
6/21/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR FUNDRAISING EXPENSES	FND	\$155.48
6/27/2016	GOLDEN LEADERSHIP FUND PO BOX 5307 AUGUSTA, ME 04332	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00
7/19/2016	ACT BLUE PO BOX 441146 SOMERVILLE, MA 02144	FEE	OTH	\$29.63
TOTAL OPERATING EXPENDITURES				\$1,245.11



Commission on Governmental Ethics and Election Practices
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 Fax: 207-287-6775

2016 CAMPAIGN FINANCE REPORT
FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338 PHONE: (207) 590-0759 EMAIL: SEANCHRISTOPHERSMITH@GMAIL.COM		STEVE VON VOGT PO BOX 15087 PORTLAND, ME 04112 EMAIL: SVONVOGT@MAINEMARINECOMPOSITES.COM	
REPORT	DUE DATE	REPORTING PERIOD	
OCTOBER QUARTERLY REPORT	10/05/2016	07/20/2016 - 09/30/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$454,530.00	\$648,279.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$25.53
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$454,530.00	\$648,304.53
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$192,802.80	\$404,511.30
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$192,802.80	\$404,511.30
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$97,145.35	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$454,530.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$192,802.80	
12. CASH BALANCE AT END OF PERIOD	\$358,872.55	
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)	\$450.00	

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

REPORT FILED BY: SEAN SMITH
 REPORT FILED ON: 10/05/2016
 LAST MODIFIED: 10/05/2016
 PRINTED: 06/29/2018
 COMMITTEE ID: 638

8/3/2016	EATON PEABODY 80 EXCHANGE ST. BANGOR, ME 04402	DESCRIPTION: Unknown CONTRIBUTION	3	\$250.00
8/3/2016	ENTERPRISE HOLDINGS PAC 600 CORPORATE PARK DRIVE ST LOUIS, MO 63105		5	\$500.00
8/3/2016	FAIRPOINT COMMUNICATIONS PO BOX 1058 WAYNE, ME 04284	DESCRIPTION: Unknown CONTRIBUTION	3	\$1,000.00
8/3/2016	SARA GIDEON 37 SOUTH FREEPORT RD FREEPORT, ME 04032	MAINE STATE LEGISLATURE DESCRIPTION: STATE REPRESENTATIVE CONTRIBUTION	1	\$250.00
8/3/2016	GO MAINE PAC 114 JOHNSON RD GORHAM, ME 04038		5	\$5,000.00
8/3/2016	LAURA HARPER 44 ACADEMY ST HALLOWELL, ME 04347	INFO REQUESTED	1	\$25.00
8/3/2016	ROBERT HOWE 170 PENNELLVILLE ROAD BRUNSWICK, ME 04011	HOWE, CAHILL & COMPANY DESCRIPTION: BUSINESS OWNER CONTRIBUTION	1	\$500.00
8/3/2016	MAINE AFL-CIO COMMITTEE ON POLITICAL EDUCATION PAC 21 GABRIEL DRIVE AUGUSTA, ME 04330		5	\$250.00
8/3/2016	MAINE ASSOCIATION OF REALTORS PAC 19 COMMUNITY DRIVE AUGUSTA, ME 04330	DESCRIPTION: Unknown CONTRIBUTION	3	\$500.00
8/3/2016	MAINE BANKERS ASSOCIATION POLITICAL ACTION COMMITTEE 489 CONGRESS STREET, SUITE 300 PORTLAND, ME 04101		5	\$500.00
8/3/2016	MAINE CONSERVATION VOTERS ACTION FUND 295 WATER STREET, SUITE 9 AUGUSTA, ME 04330		5	\$100.00
8/3/2016	Maine Credit Union League PO Box 1236 Portland, ME 04104	DESCRIPTION: Unknown CONTRIBUTION	3	\$500.00
8/3/2016	MAINE DENTAL PAC P.O. BOX 215 MANCHESTER, ME 04351		5	\$250.00
8/3/2016	Maine Education Association/MEA PAC 35 Community Drive Augusta, ME 04330	DESCRIPTION: Unknown CONTRIBUTION	5	\$500.00
8/3/2016	MAINE EYE PAC 30 ASSOCIATION DRIVE MANCHESTER, ME 04351		5	\$500.00

9/12/2016	PHIL ROSE 49 BOWMAN ST FARMINGDALE, ME 04344	INFO REQUESTED	1	\$25.00
9/12/2016	ROTUNDO LEADERSHIP PAC 446 COLLEGE STREET LEWISTON, ME 04240		5	\$200.00
9/12/2016	EVELYN SILVER P.O. BOX 844 BANGOR, ME 04402	INFO REQUESTED	1	\$2,500.00
9/12/2016	NANCY VALLEY 12 OSPREY LANE WEST GARDEINER, ME 04345	INFO REQUESTED	1	\$50.00
9/12/2016	CATHERINE WHITNEY 10 JAMES ST FARMINGDALE, ME 04344	C&C REALTY MANAGEMENT DESCRIPTION: PROPERTY MANAGEMENT CONTRIBUTION	1	\$50.00
9/12/2016	DIANE WOODS 12 GRANT ST FARMINGDALE, ME 04344	INFO REQUESTED	1	\$50.00
9/13/2016	Democratic Legislative Campaign Committee 1401 K St NW Ste. 201 Washington, DC 20005	DESCRIPTION: Unknown CONTRIBUTION	5	\$50,000.00
9/14/2016	ANHEUSER-BUSCH 1127 PERSTALOOZI STREET ST. LOUIS, MO 63118		3	\$100.00
9/14/2016	RICHARD ATLEE P.O. BOX 1510 SOUTHWEST HARBOR, ME 04679	NOT EMPLOYED DESCRIPTION: Not Currently Employed CONTRIBUTION	1	\$25.00
9/14/2016	Pola Buckley 71 Central St Hallowell, ME 04347	State of Maine DESCRIPTION: State Auditor CONTRIBUTION	1	\$100.00
9/14/2016	LARRY CAMPBELL 1 CENTER STREET ROCKLAND, ME 04841	NOT EMPLOYED DESCRIPTION: Not Currently Employed CONTRIBUTION	1	\$100.00
9/14/2016	JOANNE CLARK 61 PEIRCE ST GARDINER, ME 04345	INFO REQUESTED	1	\$25.00
9/14/2016	PETER COLLIN 217 SUNSET RD DEER ISLE, ME 04627	COASTSIDE BIO RESOURCES DESCRIPTION: HEALTH PRODUCTS CONTRIBUTION	1	\$100.00
9/14/2016	EXPRESS SCRIPTS ONE EXPRESS WAY ST. LOUIS, MO 63121		3	\$250.00
9/14/2016	GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032		5	\$40,000.00

Commission on Governmental Ethics and Election Practices
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 Fax: 207-287-6775



2016 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
OCTOBER QUARTERLY REPORT	10/05/2016	07/20/2016 - 09/30/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$14,250.00	\$33,300.00
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)	\$14,250.00	\$33,300.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$1,500.00	\$4,125.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$47,608.92	\$51,183.60
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$49,108.92	\$55,308.60
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$54,783.92	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$14,250.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$49,108.92	
12. CASH BALANCE AT END OF PERIOD	\$19,925.00	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 10/05/2016
 LAST MODIFIED: 02/06/2017
 PRINTED: 06/29/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
7/21/2016	DANDELION CATERING 81 BRIDGE ST YARMOUTH, ME 04096	FOOD FOR FUNDRAISING EVENT - REIMBURSEMENT TO SARA GIDEON	FOD	\$551.00
7/25/2016	EMERGE MAINE PO BOX 3445 PORTLAND, ME 04101	CONTRIBUTION	FND	\$300.00
7/25/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR MDP CONTRIBUTION	OTH	\$1,000.00
7/25/2016	MAINE DEMOCRATIC STATE COMMITTEE 320 WATER ST, 3RD FLR P.O. BOX 5258 AUGUSTA, ME 04332	CONTRIBUTION	CON	\$500.00
7/27/2016	MAINE STATE COUNCIL OF MACHINISTS 439 RIVER ROAD NORRIDGWOCK, ME 04947	CONTRIBUTION	FND	\$200.00
8/21/2016	EMILY CAIN FOR CONGRESS PO BOX 1523 BANGOR, ME 04402	CONTRIBUTION	OTH	\$750.00
8/29/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION	CON	\$40,000.00
9/12/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR TRAVEL	TRV	\$2,324.44
9/20/2016	MAINE AFL-CIO 21 GABRIAL DRIVE AUGUSTA, ME 04330	DONATION	OTH	\$300.00
9/26/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR TRAVEL	TRV	\$868.48
9/26/2016	ANDREW ROTH-WELLS 81 WILLIAMS ROAD GEORGETOWN, ME 04548	REIMBURSEMENT FOR VIDEO SERVICES	WEB	\$815.00
TOTAL OPERATING EXPENDITURES				\$47,608.92



Commission on Governmental Ethics and Election Practices
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2016 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
11-DAY PRE-GENERAL REPORT	10/28/2016	10/01/2016 - 10/25/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$16,450.00	\$49,750.00
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)	\$16,450.00	\$49,750.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$4,125.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$22,650.00	\$73,833.60
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$22,650.00	\$77,958.60
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$19,925.00	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$16,450.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$22,650.00	
12. CASH BALANCE AT END OF PERIOD	\$13,725.00	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 10/28/2016
 LAST MODIFIED: 02/06/2017
 PRINTED: 06/29/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/12/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR CONTRIBUTION	OTH	\$500.00
10/14/2016	TRIBUTE FOR SPEAKER EVES 461 EIGHT ROD ROAD AUGUSTA, ME 04330	CONTRIBUTION FOR EVENT	FND	\$150.00
10/24/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION	CON	\$22,000.00
TOTAL OPERATING EXPENDITURES				\$22,650.00



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2016 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338 PHONE: (207) 590-0759 EMAIL: SEANCHRISTOPHERSMITH@GMAIL.COM		STEVE VON VOGT PO BOX 15087 PORTLAND, ME 04112 EMAIL: SVONVOGT@MAINEMARINECOMPOSITES.COM	
REPORT	DUE DATE	REPORTING PERIOD	
11-DAY PRE-GENERAL REPORT	10/28/2016	10/01/2016 - 10/25/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$184,894.00	\$833,173.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$25.53
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$184,894.00	\$833,198.53
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$440,793.64	\$845,304.94
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$440,793.64	\$845,304.94
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$358,872.55	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$184,894.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$440,793.64	
12. CASH BALANCE AT END OF PERIOD	\$102,972.91	
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)	\$450.00	

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

REPORT FILED BY: SEAN SMITH
 REPORT FILED ON: 10/28/2016
 LAST MODIFIED: 10/28/2016
 PRINTED: 06/29/2018
 COMMITTEE ID: 638

10/24/2016	ELI LILLY AND COMPANY 639 SOUTH DELAWARE ST INDIANAPOLIS, IN 46285		3	\$500.00
10/24/2016	ELI LILLY AND COMPANY 639 SOUTH DELAWARE ST INDIANAPOLIS, IN 46285		3	\$200.00
10/24/2016	EMERA MAINE P.O. BOX 932 BANGOR, ME 04402		3	\$1,000.00
10/24/2016	FRANK GEAGAN 270 HARTLAND AVE PITTSFIELD, ME 04967	INFO REQUESTED	1	\$25.00
10/24/2016	GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032		5	\$22,000.00
10/24/2016	PHILIP GLEASON 24 HILLSIDE AVE CUMBERLAND, ME 04021	BERNSTEIN SHUR DESCRIPTION: Attorney/Legal CONTRIBUTION	1	\$100.00
10/24/2016	JOSEPH HIGDON PO BOX 122 TENANTS HARBOR, ME 04864	RETIRED DESCRIPTION: Retired CONTRIBUTION	1	\$5,000.00
10/24/2016	ANDREW HYSSELL 1364 EMERALD STREET NE WASHINGTON, DC 20002	HW LLC DESCRIPTION: Consultant CONTRIBUTION	1	\$250.00
10/24/2016	FRANCIS JACKSON 139 HARTLEY STREET PORTLAND, ME 04103	JACKSON & MACNICHOL DESCRIPTION: Attorney/Legal CONTRIBUTION	1	\$1,000.00
10/24/2016	JAMES F. MITCHELL COMPANY, LLC 106 SEWALL ST. AUGUSTA, ME 04330	DESCRIPTION: Unknown CONTRIBUTION	3	\$250.00
10/24/2016	KATHERINE KNOX 30 SHINGLE WAY PORTLAND, ME 04103	BERNSTEIN SHUR DESCRIPTION: Attorney/Legal CONTRIBUTION	1	\$100.00
10/24/2016	MARGARET LAVOIE 28 CARLYLE ROAD PORTLAND, ME 04103	GIVERTZ, SCHEFFEE & LAVOIE DESCRIPTION: Attorney/Legal CONTRIBUTION	1	\$250.00
10/24/2016	MAINE YOUTH CAMP ASSOCIATION PO BOX 11494 PORTLAND, ME 04104	DESCRIPTION: Unknown CONTRIBUTION	3	\$500.00

EXHIBIT E



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

2016 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
42-DAY POST-PRIMARY REPORT	07/26/2016	06/01/2016 - 07/19/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$19,050.00	\$19,050.00
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)	\$19,050.00	\$19,050.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$2,625.00	\$2,625.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$1,245.11	\$3,574.68
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$3,870.11	\$6,199.68
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$39,604.03	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$19,050.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$3,870.11	
12. CASH BALANCE AT END OF PERIOD	\$54,783.92	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 07/26/2016
 LAST MODIFIED: 02/06/2017
 PRINTED: 06/29/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
6/1/2016	EMILY CAIN FOR CONGRESS PO BOX 1523 BANGOR, ME 04402	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	FND	\$250.00
6/1/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00
6/21/2016	FIRE AND CO. 102 YORK ST KENNEBUNKPORT, ME 04043	FOOD FOR EVENT	FOD	\$310.00
6/21/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR FUNDRAISING EXPENSES	FND	\$155.48
6/27/2016	GOLDEN LEADERSHIP FUND PO BOX 5307 AUGUSTA, ME 04332	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00
7/19/2016	ACT BLUE PO BOX 441146 SOMERVILLE, MA 02144	FEE	OTH	\$29.63
TOTAL OPERATING EXPENDITURES				\$1,245.11



Commission on Governmental Ethics and Election Practices
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 Phone: 207-287-4179
 Fax: 207-287-6775

2016 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GOLDEN LEADERSHIP FUND PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 622-7432 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
42-DAY POST-PRIMARY REPORT	07/26/2016	06/01/2016 - 07/19/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$4,270.00	\$4,320.00
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)	\$4,270.00	\$4,320.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$1,500.00	\$1,500.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$1,656.06	\$2,281.06
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$3,156.06	\$3,781.06
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$9,270.25	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$4,270.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$3,156.06	
12. CASH BALANCE AT END OF PERIOD	\$10,384.19	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 07/26/2016
 LAST MODIFIED: 04/10/2017
 PRINTED: 06/29/2018
 COMMITTEE ID: 8605

6/21/2016	CARL L SHELIN 17 CHERRYWOOD DRIVE LEWISTON, ME 04240	INFO REQUESTED	1	\$500.00
6/21/2016	MARY ANNE TUROWSKI 2462 KENNEBEC ROAD NEWBURGH, ME 04444	MAINE STATE EMPLOYEES ASSOCIATION DESCRIPTION: DIRECTOR OF POLITICS & LEGISLATION	1	\$50.00
6/25/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	MAINE LEGISLATURE DESCRIPTION: STATE REPRESENTATIVE CONTRIBUTION	1	\$250.00
6/27/2016	CENTRAL DISTRIBUTORS 15 FOSS ROAD P.O. BOX 1936 LEWISTON, ME 04241-1936		3	\$250.00
6/27/2016	EATON PEABODY 80 EXCHANGE STREET P.O. BOX 1210 BANGOR, ME 04402-1210		3	\$100.00
6/27/2016	MAINE CREDIT UNION LEAGUE P.O. BOX 1236 PORTLAND, ME 04104		3	\$250.00
6/27/2016	MAINE HEALTH CARE ASSOCIATION 317 STATE STREET AUGUSTA, ME 04330		5	\$250.00
6/27/2016	PIERCE ATWOOD LLP 254 COMMERCIAL STREET PORTLAND, ME 04101		3	\$150.00
6/27/2016	RESOURCE POLICY GROUP, INC. 434 LOVEJOY SHORES DRIVE FAYETTE, ME 04349-3638		3	\$100.00
7/19/2016	CONTRIBUTORS GIVING \$50 OR LESS		12	\$50.00
7/19/2016	ELAINE MAKAS, PH,D 10 SHEFFIELD AVENUE LEWISTON, ME 04240	UNIVERSITY OF SOUTHERN MAINE DESCRIPTION: ADJUNCT ASSOCIATE PROFESSOR	1	\$50.00
TOTAL CASH CONTRIBUTIONS				\$4,270.00



Commission on Governmental Ethics and Election Practices
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 Website: www.maine.gov/ethics
 Phone: 207-287-4179
 Fax: 207-287-6775

2015 CAMPAIGN FINANCE REPORT
FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 622-7432 EMAIL: JNUTTING@VERRILLDANA.COM	
REPORT	DUE DATE	REPORTING PERIOD	
JANUARY QUARTERLY	01/15/2016	10/01/2015 - 12/31/2015	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$30,310.00	\$45,285.00
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)	\$30,310.00	\$45,285.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$6,739.39	\$10,710.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$6,739.39	\$10,710.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$18,362.99	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$30,310.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$6,739.39	
12. CASH BALANCE AT END OF PERIOD	\$41,933.60	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 01/15/2016
 LAST MODIFIED: 01/15/2016
 PRINTED: 06/30/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/5/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR TRAVEL EXPENSES	TRV	\$624.20
10/11/2015	ACT BLUE PO BOX 441146 SOMERVILLE, MA 02144	PROCESSING FEES	OTH	\$71.12
10/28/2015	EMPOWERING MAINE LEADERSHIP PAC 110 SEWALL STREET AUGUSTA, ME 04330	CONTRIBUTION	CON	\$250.00
10/28/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR FEDERAL CONTRIBUTION	OTH	\$1,000.00
10/28/2015	GOLDEN LEADERSHIP FUND PO BOX 5307 AUGUSTA, ME 04332	CONTRIBUTION	CON	\$250.00
11/3/2015	DANDELION CATERING 81 BRIDGE ST YARMOUTH, ME 04096	FOOD	FOD	\$899.37
11/5/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENTS FOR TRAVEL - HOTEL	TRV	\$3,644.70
TOTAL OPERATING EXPENDITURES				\$6,739.39



Commission on Governmental Ethics and Election Practices
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2015 CAMPAIGN FINANCE REPORT
FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GOLDEN LEADERSHIP FUND PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 622-7432 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
JANUARY QUARTERLY	01/15/2016	10/01/2015 - 12/31/2015	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$9,030.00	\$9,880.00
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)	\$9,030.00	\$9,880.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$34.75	\$34.75
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$34.75	\$34.75
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$850.00	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$9,030.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$34.75	
12. CASH BALANCE AT END OF PERIOD	\$9,845.25	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$640.00	\$640.00
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 01/15/2016
 LAST MODIFIED: 04/10/2017
 PRINTED: 06/30/2018
 COMMITTEE ID: 8605

11/13/2015	CLEAN POWER PAC PO BOX 743 AUGUSTA, ME 04332-0743		5	\$1,000.00
11/13/2015	TIME WARNER CABLE 7800 CRESCENT EXECUTIVE DRIVE CHARLOTTE, NC 28217		3	\$500.00
11/17/2015	AT&T SERVICES, INC. 99 BEDFORD STREET BOSTON, MA 02111		3	\$200.00
12/1/2015	VISA P.O. BOX 203730 AUSTIN, TX 78720		3	\$500.00
12/3/2015	BECK POLITICAL FUND 25 CLEARVIEW AVENUE WATERVILLE, ME 04901		5	\$250.00
12/3/2015	BERNSTEIN SHUR 100 MIDDLE STREET P.O. BOX 9729 PORTLAND, ME 04104-5029		3	\$500.00
12/3/2015	CENTRAL DISTRIBUTORS 15 FOSS ROAD P.O. BOX 1936 LEWISTON, ME 04241-1936		3	\$250.00
12/3/2015	CLEAN POWER PAC PO BOX 743 AUGUSTA, ME 04332-0743		5	\$500.00
12/3/2015	EATON PEABODY 80 EXCHANGE STREET P.O. BOX 1210 BANGOR, ME 04402-1210		3	\$100.00
12/3/2015	EMPOWERING MAINE LEADERSHIP PAC 110 SEWALL STREET AUGUSTA, ME 04330		5	\$250.00
12/3/2015	ENERGY PAC FOR MAINE P.O. BOX 249 BRUNSWICK, ME 04011		5	\$250.00
12/3/2015	MARIA FUENTES 21 UNION STREET HALLOWELL, ME 04347	MAINE MOTOR TRANSPORT ASSN. DESCRIPTION: EXECUTIVE DIRECTOR	1	\$100.00
12/3/2015	GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032		5	\$250.00
12/3/2015	HOWE, CAHILL & COMPANY 11 COLUMBIA STREET AUGUSTA, ME 04330		3	\$250.00
12/3/2015	MAINE AFFORDABLE HOUSING COALITION 307 CUMBERLAND AVENUE PORTLAND, ME 04101		3	\$100.00
12/3/2015	MAINE BEER & WINE WHOLESALERS ASSOC. P.O. BOX 615 AUGUSTA, ME 04332-0615		3	\$500.00
12/3/2015	MAINE BEER & WINE WHOLESALERS ASSOC. P.O. BOX 615 AUGUSTA, ME 04332-0615		3	\$500.00
12/3/2015	MAINE CREDIT UNION LEAGUE P.O. BOX 1236 PORTLAND, ME 04104		3	\$250.00

EXHIBIT F

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)		PAGE 16 OF 106	
	<input checked="" type="checkbox"/> 11a 13	<input type="checkbox"/> 11b 14	<input type="checkbox"/> 11c 15	<input type="checkbox"/> 12 16

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Maine Democratic State Committee

Full Name (Last, First, Middle Initial) A. Rachel A. Hendrickson		Date of Receipt MM / DD / YYYY 07 / 11 / 2016
Mailing Address 2 Plantation Dr		Transaction ID : 11ai-000038445
City Scarborough	State ME	Zip Code 04074-9800
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 500.00
Name of Employer N/A	Occupation Retired	Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 2441.48	

Full Name (Last, First, Middle Initial) B. Sara I. Gideon		Date of Receipt MM / DD / YYYY 07 / 11 / 2016
Mailing Address 37 S Freeport Rd		Transaction ID : 11ai-000038451
City Freeport	State ME	Zip Code 04032-6100
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 1000.00
Name of Employer Maine State Legislature	Occupation State Rep.	Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 1000.00	

Full Name (Last, First, Middle Initial) C. Marianne T. Stevens		Date of Receipt MM / DD / YYYY 07 / 12 / 2016
Mailing Address 1618 Crosss Hill Rd		Transaction ID : 11ai-000038579
City North Vassalboro	State ME	Zip Code 04962
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 10.00
Name of Employer None	Occupation Retired	Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 308.72	

SUBTOTAL of Receipts This Page (optional).....▶	1510.00
TOTAL This Period (last page this line number only).....▶	



Commission on Governmental Ethics and Election Practices
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2016 CAMPAIGN FINANCE REPORT
FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
OCTOBER QUARTERLY REPORT	10/05/2016	07/20/2016 - 09/30/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$14,250.00	\$33,300.00
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)	\$14,250.00	\$33,300.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$1,500.00	\$4,125.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$47,608.92	\$51,183.60
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$49,108.92	\$55,308.60
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$54,783.92	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$14,250.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$49,108.92	
12. CASH BALANCE AT END OF PERIOD	\$19,925.00	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 10/05/2016
 LAST MODIFIED: 02/06/2017
 PRINTED: 08/29/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
7/21/2016	DANDELION CATERING 81 BRIDGE ST YARMOUTH, ME 04096	FOOD FOR FUNDRAISING EVENT - REIMBURSEMENT TO SARA GIDEON	FOD	\$551.00
7/25/2016	EMERGE MAINE PO BOX 3445 PORTLAND, ME 04101	CONTRIBUTION	FND	\$300.00
7/25/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR MDP CONTRIBUTION	OTH	\$1,000.00
7/25/2016	MAINE DEMOCRATIC STATE COMMITTEE 320 WATER ST, 3RD FLR P.O. BOX 5258 AUGUSTA, ME 04332	CONTRIBUTION	CON	\$500.00
7/27/2016	MAINE STATE COUNCIL OF MACHINISTS 439 RIVER ROAD NORRIDGWOCK, ME 04947	CONTRIBUTION	FND	\$200.00
8/21/2016	EMILY CAIN FOR CONGRESS PO BOX 1523 BANGOR, ME 04402	CONTRIBUTION	OTH	\$750.00
8/29/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION	CON	\$40,000.00
9/12/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR TRAVEL	TRV	\$2,324.44
9/20/2016	MAINE AFL-CIO 21 GABRIAL DRIVE AUGUSTA, ME 04330	DONATION	OTH	\$300.00
9/26/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR TRAVEL	TRV	\$868.48
9/26/2016	ANDREW ROTH-WELLS 81 WILLIAMS ROAD GEORGETOWN, ME 04548	REIMBURSEMENT FOR VIDEO SERVICES	WEB	\$815.00
TOTAL OPERATING EXPENDITURES				\$47,608.92

EXHIBIT G

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 15 OF 674

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 17
13	14	15	16	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Maine Democratic Party

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Gideon, Sara, L.,			Date of Receipt M M / D D / Y Y Y Y Y 10 / 03 / 2016
Mailing Address 37 S Freeport Rd			Transaction ID : 11a1-000040589
City Freeport	State ME	Zip Code 04032-6100	Amount of Each Receipt this Period 500.00
FEC ID number of contributing federal political committee. C			<input type="checkbox"/> Memo Item
Name of Employer (for Individual) Maine State Legislature		Occupation (for Individual) State Rep.	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 1500.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Grohman, Martin, , ,			Date of Receipt M M / D D / Y Y Y Y Y 10 / 04 / 2016
Mailing Address 9 Lisa Ln			Transaction ID : 11a1-000041039
City Biddeford	State ME	Zip Code 04005-4047	Amount of Each Receipt this Period 35.00
FEC ID number of contributing federal political committee. C			<input type="checkbox"/> Memo Item
Name of Employer (for Individual) Buttercup Z, Inc.		Occupation (for Individual) Consultant	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 310.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Boyajian, Margaret, Marilyn, ,			Date of Receipt M M / D D / Y Y Y Y Y 10 / 04 / 2016
Mailing Address 63 Patricia Ln			Transaction ID : 11a1-000040464
City Spruce Head	State ME	Zip Code 04859-4255	Amount of Each Receipt this Period 50.00
FEC ID number of contributing federal political committee. C			<input type="checkbox"/> Memo Item
Name of Employer (for Individual) N/A		Occupation (for Individual) Retired	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date ▼ 225.00	

SUBTOTAL of Receipts This Page (optional).....▶	585.00
TOTAL This Period (last page this line number only).....▶	



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

2016 CAMPAIGN FINANCE REPORT
FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
11-DAY PRE-GENERAL REPORT	10/28/2016	10/01/2016 - 10/25/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$16,450.00	\$49,750.00
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)	\$16,450.00	\$49,750.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$4,125.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$22,650.00	\$73,833.60
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$22,650.00	\$77,958.60
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$19,925.00	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$16,450.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$22,650.00	
12. CASH BALANCE AT END OF PERIOD	\$13,725.00	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 10/28/2016
 LAST MODIFIED: 02/06/2017
 PRINTED: 06/29/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/12/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR CONTRIBUTION	OTH	\$500.00
10/14/2016	TRIBUTE FOR SPEAKER EVES 461 EIGHT ROD ROAD AUGUSTA, ME 04330	CONTRIBUTION FOR EVENT	FND	\$150.00
10/24/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION	CON	\$22,000.00
TOTAL OPERATING EXPENDITURES				\$22,650.00

Exhibit H

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 96 OF 124
(check only one)
 11a 11b 11c 11d
 12 13a 13b 14 15

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NAME OF COMMITTEE (In Full)
Pingree for Congress

Full Name (Last, First, Middle Initial)
A. Gideon Leadership PAC

Mailing Address **PO Box 5307**

City State Zip Code
Augusta ME 04332-5307

FEC ID number of contributing federal political committee. **C**

Name of Employer Occupation

Receipt For: 2016
 Primary General
 Other (specify)
 Election Cycle-to-Date **250.00**

Date of Receipt
 M M / D D / Y Y Y Y
03 18 2016

Transaction ID : **VR014FP38A9**

Amount of Each Receipt this Period
250.00
 Memo Item

Comprised of Permissible Funds

Full Name (Last, First, Middle Initial)
B. International Association of Firefighters Interested in Registration & Education PAC

Mailing Address **1750 New York Ave NW**

City State Zip Code
Washington DC 20006-5301

FEC ID number of contributing federal political committee. **C C00029447**

Name of Employer Occupation

Receipt For: 2016
 Primary General
 Other (specify)
 Election Cycle-to-Date **1000.00**

Date of Receipt
 M M / D D / Y Y Y Y
03 29 2016

Transaction ID : **VR014G6ZKC3**

Amount of Each Receipt this Period
1000.00
 Memo Item

Full Name (Last, First, Middle Initial)
C. INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES POLITICAL ACTION TOGETHER POLITICAL COMMITTEE

Mailing Address **7234 Parkway Dr**

City State Zip Code
Hanover MD 21076-1307

FEC ID number of contributing federal political committee. **C C00000885**

Name of Employer Occupation

Receipt For: 2016
 Primary General
 Other (specify)
 Election Cycle-to-Date **3000.00**

Date of Receipt
 M M / D D / Y Y Y Y
01 29 2016

Transaction ID : **VR014F4JGW0**

Amount of Each Receipt this Period
1500.00
 Memo Item

SUBTOTAL of Receipts This Page (optional).....
TOTAL This Period (last page this line number only).....

2750.00

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 1475 OF 1587
(check only one)
 11a 11b 11c 11d
 12 13a 13b 14 15

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NAME OF COMMITTEE (In Full)
Cain for Congress

A. Full Name (Last, First, Middle Initial)
FRIENDS OF JIM CLYBURN

Mailing Address PO Box 12567

City Columbia State SC Zip Code 29211-2567

FEC ID number of contributing federal political committee. **C** C00255562

Name of Employer Occupation

Receipt For: 2016
 Primary General
 Other (specify) ▼

Election Cycle-to-Date ▼

3000.00

Date of Receipt
 M M / D D / Y Y Y Y
 09 30 2016

Transaction ID : VNV5ESY825

Amount of Each Receipt this Period
 2000.00

Memo Item

B. Full Name (Last, First, Middle Initial)
Gideon Leadership PAC

Mailing Address PO Box 5307

City Augusta State ME Zip Code 04332-5307

FEC ID number of contributing federal political committee. **C**

Name of Employer Occupation

Receipt For: 2016
 Primary General
 Other (specify) ▼

Election Cycle-to-Date ▼

750.00

Date of Receipt
 M M / D D / Y Y Y Y
 08 25 2016

Transaction ID : VNV5ER2TP0

Amount of Each Receipt this Period
 750.00

Memo Item

Comprised of Permissible funds

C. Full Name (Last, First, Middle Initial)
GOAL PAC

Mailing Address PO Box 30344

City Bethesda State MD Zip Code 20824-0344

FEC ID number of contributing federal political committee. **C** C00381996

Name of Employer Occupation

Receipt For: 2016
 Primary General
 Other (specify) ▼

Election Cycle-to-Date ▼

5000.00

Date of Receipt
 M M / D D / Y Y Y Y
 09 30 2016

Transaction ID : VNV5ESXD70

Amount of Each Receipt this Period
 1000.00

Memo Item

SUBTOTAL of Receipts This Page (optional).....▶	\$	\$	3750.00
TOTAL This Period (last page this line number only).....▶	\$	\$	

Exhibit I

BEFORE THE FEDERAL ELECTION COMMISSION

Edward Youngblood
735 North Main Street
Brewer, ME 04412

v. MUR No. _____

Sara Gideon
37 South Freeport Road
Freeport, ME 04032

Gideon Leadership PAC
37 South Freeport Road
Freeport, ME 04032

COMPLAINT

1. This complaint is filed pursuant to 52 U.S.C. §30109(a)(1) and is based on information and belief that Sara Gideon was the architect of an unlawful conduit-contribution scheme through her former state leadership PAC¹, Gideon Leadership PAC (the “State PAC”), in which she knowingly made multiple contributions to federal committees with her personal funds that were later reimbursed by the PAC in violation of Section 30222 of the Federal Election Campaign Act (“FECA”), 52 U.S.C. §30101 *et seq.*
2. As federal and state campaign finance disclosures reveal, there is reason to believe that Sara Gideon contributed personal funds totaling at least \$2,750 to a federal candidate committee (Emily Cain for Congress) and to the federal account of a state party committee (the Maine Democratic Party). They also show that Gideon Leadership PAC, a Maine non-federal political action committee whose principal officer and decision-maker was Sara Gideon², immediately reimbursed Gideon for those contributions—likely with impermissible corporate funds.
3. When confronted with these facts, Gideon admitted the contributions were reimbursed in violation of the law. Her spokesperson conceded that the committee “was given incorrect guidance on how to process the contributions.” Sara Gideon ran afoul of election law with political donations in 2015 and 2016, *Bangor Daily News*, Aug. 1, 2019, available

¹ Sara Gideon was the principal officer and a decision-maker of the Gideon Leadership PAC, a state political action committee registered with the Maine Commission on Governmental Ethics and Election Practices, that terminated earlier this year when Sara Gideon declared her candidacy for the United States Senate. *See* <https://mainecampaignfinance.com/#!/exploreCommitteeDetail/4851>.

² During the time period that Gideon and the PAC engaged in the scheme described in this Complaint, Gideon served as a principal officer of the PAC. Under Maine law, the principal officer is as responsible for ensuring the committee’s compliance with the state campaign finance laws, including filing complete and accurate reports. *See* Me. Rev. Stat. tit. 21-A, § 1054-A. In addition, Gideon was a primary decision-maker of the committee and signed an acknowledgement that she is “deemed to have participated in any spending decisions of the committee.” *See* Exhibit A.

here: <https://bangordailynews.com/2019/08/01/politics/sara-gideon-ran-afoul-of-federal-election-law-with-political-donations-in-2015-and-2016/>.

4. Thus, Gideon not only engaged in an illegal “giving in the name of another” scheme, but also laundered her state PAC’s impermissible “soft money” into federal elections.
5. Under Maine law, unions and corporations as well as individuals are permitted to make unlimited contributions to a political action committee such as Gideon Leadership PAC. A state political action committee, in turn, is permitted to contribute directly to state candidates (subject to applicable limits) provided that the recipient candidate is not participating in the Maine Clean Election Act Program. *See* Me. Rev. Stat. Ann. tit. 21-A §§ 1015, 1004; *see also* <https://www.maine.gov/ethics/pacs/contexp.htm>.
6. In accordance with state law, Gideon Leadership PAC accepted \$57,500 in corporate contributions from scores of corporations including AstraZeneca, Comcast, Visa, Time Warner Cable, and Merck. during the time period in which it engaged in the conduit-contribution scheme described in this Complaint. The PAC also accepted an additional \$17,000 from other state political action committees. It accepted only \$20,150 from individuals during this period.³
7. Sara Gideon then used her state PAC—for which she served as the legally responsible person—to reimburse herself with these “soft” non-federal dollars for four federal political contributions that she reported making using personal funds. She apparently did so as an end-run around the federal law that prohibits the use of non-federal dollars in federal campaigns and would have required Gideon Leadership PAC to register with the Federal Election Commission (“FEC”) as a federal political committee and disclose its activities (11 C.F.R. §§100.5(a) and 102.1(d)) had it made the contributions directly to the federal committees. In addition, the scheme allowed Gideon to use her PAC to reimburse herself for contributions she reported making personally, while avoiding a requirement that the PAC segregate federally permissible funds from impermissible funds (e.g., corporate funds) or restrict its contributions to federally permissible sources (11 C.F.R. §102.5(a)(i), (ii)).
8. In short, Gideon’s contribution reimbursement scheme—outlined in greater detail below—operated in direct violation of the straw donor ban at 52 U.S.C. §30122. Moreover, because there is nothing on the public record that indicates that the PAC established a separate account for federally permissible funds, the contributions it made to federal committees likely included impermissible soft money including corporate funds in violation of the corporate contribution prohibition at 52 U.S.C. §30118.

FACTS

9. Specifically, on September 30, 2015, Cain for Congress, the authorized campaign committee of Emily Cain (C00546077), reported the receipt of a \$1,000 contribution

³ *See* Gideon Leadership PAC filings: <https://mainecampaignfinance.com/#!/exploreCommitteeDetail/4851>.

from Sara I. Gideon of Freeport, Maine. Approximately one month later, on October 28, 2015, Gideon Leadership PAC, reported a \$1,000 disbursement to Sara Gideon with the description “Reimbursement for Federal Contribution.” *See* Exhibit B.

10. On June 13, 2016, Cain for Congress reported the receipt of an additional \$250 contribution from Sara I. Gideon of Freeport, Maine. The same month Gideon Leadership PAC reported a \$250 disbursement described as “Contribution – Reimbursement to Sara Gideon.” *See* Exhibit C.
11. On July 11, 2016, the Maine Democratic Party’s (C00179408) FEC Report discloses the receipt of a \$1,000 contribution from Sara I. Gideon of Freeport, Maine. Just days later on July 25, 2016, Gideon Leadership PAC reports disbursing \$1,000 to Sara Gideon described as “Reimbursement for MDP Contribution.” *See* Exhibit D.
12. On October 3, 2016, the Maine Democratic Party’s FEC Report discloses the receipt of a \$500 contribution from Sara I. Gideon of Freeport, Maine. On October 12, 2016, Gideon Leadership PAC reported a \$500 disbursement to Sara Gideon described as “Reimbursement for Contribution.” *See* Exhibit E.
13. In 2016, the PAC also made direct contributions to federal candidates including a \$250 contribution on March 14, 2016 to Pingree for Congress and a \$750 contribution on August 21, 2016 to Cain for Congress. *See* Exhibit F.

CAUSES OF ACTION

I. Sara Gideon and Gideon Leadership PAC Violated the Prohibition on Giving in the Name of Another By Knowingly Devising a Conduit-Contribution Scheme Through Which the PAC Immediately Reimbursed Gideon’s Federal Political Contributions

14. The Federal Election Campaign Act clearly provides that “[n]o person shall make a contribution in the name of another person.” 52 U.S.C. § 30122; *see also* 11 C.F.R. §110.4(b)(1)(i). In fact, under the statute, it is unlawful to “knowingly permit one’s name to be used to effect the making of a contribution in the name of another.” 52 U.S.C. § 30122. Moreover, the regulations state that it is unlawful to “knowingly help or assist any person in making a contribution in the name of another.” 11 C.F.R. §110.4(b)(1)(ii),(iii).
15. The regulations cite specific examples of contributions in the name of another, which can include, “[g]iving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of the money ... to the recipient candidate or committee at the time the contribution is made.” 11 C.F.R. §110.4(b)(2)(i). In implementing these regulations, the Commission noted that the provisions apply to “those who initiate or instigate or have some significant participation in a plan or scheme to make a contribution in the name of another.”

Explanation and Justification for 11 C.F.R. §110.4, 54 Fed. Reg. 34,098, 34,105 (Aug. 17, 1989).

16. When confronted by the *Bangor Daily News* about the contributions, a Gideon spokesperson conceded that the committee “was given incorrect guidance on how to process the contributions.” Sara Gideon ran afoul of election law with political donations in 2015 and 2016, *Bangor Daily News*, Aug. 1, 2019, available here: <https://bangordailynews.com/2019/08/01/politics/sara-gideon-ran-afoul-of-federal-election-law-with-political-donations-in-2015-and-2016/>. This admission and the state PAC’s own description of the disbursements outlined above as a “reimbursement” for a federal contribution, make clear that the PAC and not Sara Gideon was the true contributor to the federal committees in question and that these reimbursements violated the straw donor ban at 52 U.S.C. § 30122 and 11 C.F.R. §110.4 . Perplexingly, Gideon claims to have sent a personal check to the U.S. Treasury to “offset” the illegally reimbursed contributions. *Id.* As the Commission knows, this does not correct the violation and the recipient federal committees must now disgorge the funds in accordance with 11 CFR §103.3(b)(2).
17. Moreover, there can be no doubt that Sara Gideon was a knowing and central participant in all aspects of this scheme. Gideon made the initial federal contributions with her personal funds as disclosed to the FEC by the recipient committees. She then caused the state PAC to issue a reimbursement to herself—a check she presumably endorsed and deposited into her personal bank account. In fact, as the principal officer and decision-maker of Gideon Leadership PAC, Gideon was deemed by law “to have participated in any spending decisions of the committee.” Moreover, as a principal officer of the PAC, Gideon was responsible for the accuracy of the PAC’s disclosure reports and had a duty to review the PAC’s disclosures to ensure that they accurately described its activities. Gideon therefore knowingly participated in both sides of the transactions under this unlawful conduit-contribution scheme to give funds in the name of another.
18. Finally, there is reason to believe that Sara Gideon was advised of the prohibition on conduit contributions by at least one of the committees to which she donated. The Maine Democratic Party’s contribution form requires donors to affirm that the contribution they are making is “from my own funds, and not from those of another.” *See* Exhibit G.

II. Gideon Leadership PAC Violated the Requirement to Register and Report as a Federal Political Committee

19. Under federal law, a committee such as Gideon Leadership PAC must register as a federal committee once it has made contributions in excess of \$1,000 in a calendar year to a federal candidate and/or federal party committee and file periodic disclosure reports. *See* 11 C.F.R. §§100.5(a) and 102.1(d).

20. In 2016, Gideon Leadership PAC reported making \$2,750 in federal political contributions. This sum includes direct contributions by the PAC on March 14, 2016 to Pingree for Congress for \$250 and on August 21, 2016 to Cain for Congress for \$750 as well as the federal contributions that the PAC reimbursed that year (\$250 to Cain for Congress on or about June 13, 2016, \$1000 to the Maine Democratic Party on or about July 2016, and \$500 to the Maine Democratic Party on or about October 2016).
21. On these facts, the PAC should have registered with the FEC as a federal political committee in approximately July 2016. Yet FEC records indicate that the PAC has never registered as a federal committee or filed reports as required by law.
22. Indeed, the conduit-contribution scheme appears to have been a deliberate end-run around this registration and disclosure requirement since the PAC was careful to keep its direct federal contributions at exactly \$1,000, precisely one cent beneath the registration threshold in 2016. However, when the reimbursed contributions made that year are aggregated with the amount of the PAC's direct federal contributions, the total was far in excess of \$1,000, the trigger for registration as a federal committee.

III. There Is Reason to Believe that Gideon Leadership PAC Failed to Segregate Federally Impermissible Corporate Funds From the Funds to Make Federal Contributions

23. Corporations, such as those that contributed to Gideon Leadership PAC, are prohibited from contributing to a federal political committee.⁴ *See* 52 U.S.C. §30118. It is for this reason that state political committees such as Gideon Leadership PAC that participate in federal elections must ensure that their federal contributions are made with federally permissible funds. Campaign finance regulations require that a committee participating in both state and federal elections thus triggering federal committee status must establish a separate account into which it deposits federally permissible funds (e.g., individual contributions within the \$5,000 limit) so that the account is not tainted by funds from federally impermissible sources such as those from corporations or other PACs that may accept corporate contributions. Alternatively, a state PAC that triggers federal registration can choose to accept only federally permissible funds and forgo accepting corporate contributions even though such contributions would be permitted under state law. *See* 11 C.F.R. §102.5(i), (ii).
24. FEC records indicate that the Gideon Leadership PAC has never registered as a federal committee even though it clearly triggered the requirements to do so. Moreover, there is no evidence on the public record to indicate that the PAC established a separate fund into which it segregated federally permissible funds from the thousands of dollars in corporate funds that it also accepted (as permitted by state law). During the time of the conduit-

⁴ This prohibition excepts contributions to independent expenditure-only committees known as Super PACs.

contribution scheme, the PAC had collected only \$20,150 from individuals (federally permissible sources) while it had raised almost four times that amount from federally impermissible sources (\$57,500 in corporate contributions and \$17,000 from other Maine political action committees).

25. Therefore, there is reason to believe that both the direct and reimbursed contributions by Gideon Leadership PAC to federal committees were made with funds that were not properly segregated but were instead comingled with impermissible corporate funds.
26. In fact, the Campaign Legal Center, a national campaign finance watchdog group, has expressed concern about this issue. Speaking to the press regarding Gideon's reimbursed contributions, Erin Choplak, CLC's director of campaign finance strategy, noted that "[c]orporations cannot make contributions to a federal campaign, and you can't circumvent that ban by using a straw donor to funnel money originally from a company to a federal candidate." See Collins Challenger Used PAC to Reimburse Own Contributions, *Washington Free Beacon*, Aug. 1, 2019, and available here: <https://freebeacon.com/politics/collins-challenger-used-pac-to-reimburse-own-contributions/>.
27. Therefore, the Commission needs to investigate whether the PAC made impermissible contributions to federal candidates using corporate funds.

PRAYER FOR RELIEF

28. Based on the foregoing, it is plain that Sara Gideon knowingly made multiple federal political contributions in the name of another (Gideon Leadership PAC) and knowingly caused the recipients of those contributions (Cain for Congress and the Maine Democratic Party) to file false reports with the FEC regarding the true source of the funds. Moreover, there is reason to believe that Gideon Leadership PAC failed to register as a federal political committee even though it contributed more than \$1,000 in 2016 to federal committees (through conduit Sara Gideon and through its direct contributions). Finally, there is reason to believe that Sara Gideon's unlawful scheme caused her PAC to improperly comingle thousands of dollars in federally impermissible funds that it accepted from corporations from those it accepted from individuals and that her PAC then used these comingled funds to make federal contributions in apparent violation of the corporate contribution ban.
29. Therefore, the Commission should conduct an immediate investigation into this matter under 52 U.S.C. §30109(a)(2), including whether Gideon's evasion of federal law by giving in the name of another was knowing and willful. In addition, the Commission should require the recipient federal committees to disgorge the unlawful contributions, and cause Gideon Leadership PAC to register as a federal committee and make full and appropriate disclosures of its activities. Finally, the Commission should seek sanctions

including civil penalties to the fullest extent of the law against Sara Gideon and Gideon Leadership PAC for any and all violations.

Respectfully submitted,

Edward Youngblood
735 North Main Street
Brewer, ME 04412

Subscribed and sworn to before me this ____ day of August 2019, at _____,
Maine, by: _____.

Signature of Notary Public
Name of Notary Public _____
Notary Public, State of Maine
My commission expires: _____

EXHIBIT A



ACKNOWLEDGMENT OF RESPONSIBILITIES — DECISION-MAKER

I, (print name) Sara Gidon, acknowledge that I am a decision-maker of Gidon Leadership PAC, a political action committee registered with the Commission on Governmental Ethics and Election Practices (the "Commission"). I acknowledge that, as a decision-maker of the committee:

(1) I am deemed to have participated in any spending decisions of the committee until the Commission has received notice of my resignation or involuntary removal from the committee.

(2) I am responsible for notifying the Commission and the committee in writing if I resign from the position of decision-maker and that my resignation will not be effective until the Commission receives such notice.

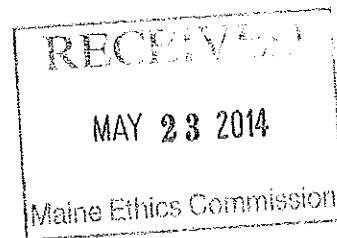
I have read this acknowledgment and understand my responsibilities as a decision-maker.

5/21/14

Signature

Date

Failure to submit the Acknowledgment of Responsibilities may result in a fine of \$100.





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

2014 REGISTRATION: POLITICAL ACTION COMMITTEE

COMMITTEE INFORMATION	
GIDEON LEADERSHIP PAC 37 South Freeport Road Freeport, ME, 04032 PAC TYPE: Leadership	Phone: (207) 865-9593 Fax: Email: SARAIGIDEON@GMAIL.COM Web:
TREASURER INFORMATION	
SEAN SMITH P.O. Box 53 Bangor, ME, 04402	Public: (207) 590-0759 Fax: Email: SEANCHRISTOPHERSMITH@GMAIL.COM
PRINCIPAL OFFICER INFORMATION	
Hon. SARA GIDEON Principal Officer 37 SOUTH FREEPORT ROAD FREEPORT, ME, 04032	Public: (207) 865-9593 Email: SARAIGIDEON@GMAIL.COM
DECISION MAKERS AND FUNDRAISERS	
LEGISLATORS AND CANDIDATES WITH A SIGNIFICANT ROLE IN THIS PAC	
Hon. SARA GIDEON	Legislator, Candidate
FORM OF ORGANIZATION	
Voluntary Association	Date of origin / incorporation 05/23/2014
FOUNDING ORGANIZATIONS	
STATEMENT OF SUPPORT OR OPPOSITION	
CERTIFICATION	
I, SEAN SMITH, certify that the information in this registration is true, accurate, and complete.	
SIGNATURE	Date: May 23, 2014

Filed Date: 5/23/2014
 Amended Date:

PAC Registration

EXHIBIT B

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 78 OF 272
	<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
	<input type="checkbox"/> 12	<input type="checkbox"/> 13a
	<input type="checkbox"/> 13b	<input type="checkbox"/> 11c
	<input type="checkbox"/> 14	<input type="checkbox"/> 11d
	<input type="checkbox"/> 15	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Cain for Congress

A. Full Name (Last, First, Middle Initial)
Sara I Gideon

Mailing Address 37 S Freeport Rd

City Freeport State ME Zip Code 04032-6100

FEC ID number of contributing federal political committee. **C**

Name of Employer State of Maine Occupation State Representative

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date
1000.00

Date of Receipt
09 / 30 / 2015

Transaction ID : VNVT5E10X81

Amount of Each Receipt this Period
1000.00

* Earmarked Contribution: See Below

B. Full Name (Last, First, Middle Initial)
ACTBLUE

Mailing Address PO Box 382110

City Cambridge State MA Zip Code 02238-2110

FEC ID number of contributing federal political committee. **C** C00401224

Name of Employer Occupation Conduit total listed in Agg. field

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date
84256.47

Date of Receipt
09 / 30 / 2015

Transaction ID : VNVT5E10X81E

Amount of Each Receipt this Period
1000.00

[MEMO ITEM]
Note: Above Contribution earmarked through this organization.

C. Full Name (Last, First, Middle Initial)
Beatrice Gilbert

Mailing Address 42 Town Farm Road

City North Yarmouth State ME Zip Code 04097

FEC ID number of contributing federal political committee. **C**

Name of Employer Self-employed Occupation Artist

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date
500.00

Date of Receipt
07 / 15 / 2015

Transaction ID : VNVT5E14BH7

Amount of Each Receipt this Period
500.00

* Earmarked Contribution: See Below

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

1500.00



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

2015 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 622-7432 EMAIL: JNUTTING@VERRILLDANA.COM	
REPORT	DUE DATE	REPORTING PERIOD	
JANUARY QUARTERLY	01/15/2016	10/01/2015 - 12/31/2015	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$30,310.00	\$45,285.00
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)	\$30,310.00	\$45,285.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$6,739.39	\$10,710.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$6,739.39	\$10,710.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$18,362.99	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$30,310.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$6,739.39	
12. CASH BALANCE AT END OF PERIOD	\$41,933.60	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 01/15/2016
 LAST MODIFIED: 01/15/2016
 PRINTED: 08/30/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/5/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR TRAVEL EXPENSES	TRV	\$624.20
10/11/2015	ACT BLUE PO BOX 441146 SOMERVILLE, MA 02144	PROCESSING FEES	OTH	\$71.12
10/28/2015	EMPOWERING MAINE LEADERSHIP PAC 110 SEWALL STREET AUGUSTA, ME 04330	CONTRIBUTION	CON	\$250.00
10/28/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR FEDERAL CONTRIBUTION	OTH	\$1,000.00
10/28/2015	GOLDEN LEADERSHIP FUND PO BOX 5307 AUGUSTA, ME 04332	CONTRIBUTION	CON	\$250.00
11/3/2015	DANDELION CATERING 81 BRIDGE ST YARMOUTH, ME 04096	FOOD	FOD	\$899.37
11/5/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENTS FOR TRAVEL - HOTEL	TRV	\$3,644.70
TOTAL OPERATING EXPENDITURES				\$6,739.39

EXHIBIT C

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 151 OF 484
	<input checked="" type="checkbox"/> 11a <input type="checkbox"/> 12	<input type="checkbox"/> 11b <input type="checkbox"/> 13a
	<input type="checkbox"/> 11c <input type="checkbox"/> 13b	<input type="checkbox"/> 11d <input type="checkbox"/> 14
	<input type="checkbox"/> 15	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Cain for Congress

A. Full Name (Last, First, Middle Initial)
John Gibson

Mailing Address **6 Choate Ln**

City **Hallowell** State **ME** Zip Code **04347-1706**

FEC ID number of contributing federal political committee. **C**

Name of Employer **Not employed** Occupation **Not employed**

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date **295.00**

Date of Receipt
M M / D D / Y Y Y Y
06 / 30 / 2016

Transaction ID : **VNVT5EFJFH0**

Amount of Each Receipt this Period
35.00

Memo Item

* Earmarked Contribution: See Below

B. Full Name (Last, First, Middle Initial)
ACTBLUE

Mailing Address **PO Box 382110**

City **Cambridge** State **MA** Zip Code **02238-2110**

FEC ID number of contributing federal political committee. **C C00401224**

Name of Employer Occupation **Conduit total listed in Agg. field**

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date **143346.09**

Date of Receipt
M M / D D / Y Y Y Y
06 / 30 / 2016

Transaction ID : **VNVT5EFJFH0E**

Amount of Each Receipt this Period
35.00

* Memo Item

Note: Above Contribution earmarked through this organization.

C. Full Name (Last, First, Middle Initial)
Sara I Gideon

Mailing Address **37 S Freeport Rd**

City **Freeport** State **ME** Zip Code **04032-6100**

FEC ID number of contributing federal political committee. **C**

Name of Employer **State of Maine** Occupation **State Representative**

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date **1400.00**

Date of Receipt
M M / D D / Y Y Y Y
06 / 13 / 2016

Transaction ID : **VNVT5EEQZN5**

Amount of Each Receipt this Period
250.00

Memo Item

* Earmarked Contribution: See Below

SUBTOTAL of Receipts This Page (optional).....

TOTAL This Period (last page this line number only).....

285.00



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

2016 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
42-DAY POST-PRIMARY REPORT	07/26/2016	06/01/2016 - 07/19/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$19,050.00	\$19,050.00
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)	\$19,050.00	\$19,050.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$2,625.00	\$2,625.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$1,245.11	\$3,574.68
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$3,870.11	\$6,199.68
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$39,604.03	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$19,050.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$3,870.11	
12. CASH BALANCE AT END OF PERIOD	\$54,783.92	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
REPORT FILED ON: 07/26/2016
LAST MODIFIED: 02/06/2017
PRINTED: 08/29/2018
COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
6/1/2016	EMILY CAIN FOR CONGRESS PO BOX 1523 BANGOR, ME 04402	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	FND	\$250.00
6/1/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00
6/21/2016	FIRE AND CO. 102 YORK ST KENNEBUNKPORT, ME 04043	FOOD FOR EVENT	FOD	\$310.00
6/21/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR FUNDRAISING EXPENSES	FND	\$155.48
6/27/2016	GOLDEN LEADERSHIP FUND PO BOX 5307 AUGUSTA, ME 04332	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00
7/19/2016	ACT BLUE PO BOX 441146 SOMERVILLE, MA 02144	FEE	OTH	\$29.63
TOTAL OPERATING EXPENDITURES				\$1,245.11

EXHIBIT D

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 16 OF 106

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 17
13	14	15	16	

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NAME OF COMMITTEE (In Full)
Maine Democratic State Committee

Full Name (Last, First, Middle Initial) A. Rachel A. Hendrickson			Date of Receipt MM / DD / YYYY 07 / 11 / 2016	
Mailing Address 2 Plantation Dr			Transaction ID : 11ai-000038445	
City Scarborough	State ME	Zip Code 04074-9800	Amount of Each Receipt this Period 500.00	
FEC ID number of contributing federal political committee. C			Memo Item	
Name of Employer N/A		Occupation Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 2441.48		

Full Name (Last, First, Middle Initial) B. Sara I. Gideon			Date of Receipt MM / DD / YYYY 07 / 11 / 2016	
Mailing Address 37 S Freeport Rd			Transaction ID : 11ai-000038451	
City Freeport	State ME	Zip Code 04032-6100	Amount of Each Receipt this Period 1000.00	
FEC ID number of contributing federal political committee. C			Memo Item	
Name of Employer Maine State Legislature		Occupation State Rep.		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 1000.00		

Full Name (Last, First, Middle Initial) C. Marianne T. Stevens			Date of Receipt MM / DD / YYYY 07 / 12 / 2016	
Mailing Address 1618 Crosss Hill Rd			Transaction ID : 11ai-000038579	
City North Vassalboro	State ME	Zip Code 04962	Amount of Each Receipt this Period 10.00	
FEC ID number of contributing federal political committee. C			Memo Item	
Name of Employer None		Occupation Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 308.72		

SUBTOTAL of Receipts This Page (optional).....▶

1510.00

TOTAL This Period (last page this line number only).....▶



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

2016 CAMPAIGN FINANCE REPORT
FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
OCTOBER QUARTERLY REPORT	10/05/2016	07/20/2016 - 09/30/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$14,250.00	\$33,300.00
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)	\$14,250.00	\$33,300.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$1,500.00	\$4,125.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$47,608.92	\$51,183.60
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$49,108.92	\$55,308.60
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$54,783.92	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$14,250.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$49,108.92	
12. CASH BALANCE AT END OF PERIOD	\$19,925.00	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 10/05/2016
 LAST MODIFIED: 02/06/2017
 PRINTED: 06/29/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
7/21/2016	DANDELION CATERING 81 BRIDGE ST YARMOUTH, ME 04096	FOOD FOR FUNDRAISING EVENT - REIMBURSEMENT TO SARA GIDEON	FOD	\$551.00
7/25/2016	EMERGE MAINE PO BOX 3445 PORTLAND, ME 04101	CONTRIBUTION	FND	\$300.00
7/25/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR MDP CONTRIBUTION	OTH	\$1,000.00
7/25/2016	MAINE DEMOCRATIC STATE COMMITTEE 320 WATER ST, 3RD FLR P.O. BOX 5258 AUGUSTA, ME 04332	CONTRIBUTION	CON	\$500.00
7/27/2016	MAINE STATE COUNCIL OF MACHINISTS 439 RIVER ROAD NORRIDGWOCK, ME 04947	CONTRIBUTION	FND	\$200.00
8/21/2016	EMILY CAIN FOR CONGRESS PO BOX 1523 BANGOR, ME 04402	CONTRIBUTION	OTH	\$750.00
8/29/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION	CON	\$40,000.00
9/12/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR TRAVEL	TRV	\$2,324.44
9/20/2016	MAINE AFL-CIO 21 GABRIAL DRIVE AUGUSTA, ME 04330	DONATION	OTH	\$300.00
9/26/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR TRAVEL	TRV	\$868.48
9/26/2016	ANDREW ROTH-WELLS 81 WILLIAMS ROAD GEORGETOWN, ME 04548	REIMBURSEMENT FOR VIDEO SERVICES	WEB	\$815.00
TOTAL OPERATING EXPENDITURES				\$47,608.92

EXHIBIT E

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 15 OF 674

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 17
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Maine Democratic Party

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Gideon, Sara, I., ,			Date of Receipt MM / DD / YYYY 10 / 03 / 2016	
Mailing Address 37 S Freeport Rd			Transaction ID : 11ai-000040589	
City Freeport	State ME	Zip Code 04032-6100	Amount of Each Receipt this Period 500.00	
FEC ID number of contributing federal political committee. C			<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Maine State Legislature		Occupation (for Individual) State Rep.		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 1500.00		

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Grohman, Martin, , ,			Date of Receipt MM / DD / YYYY 10 / 04 / 2016	
Mailing Address 9 Lisa Ln			Transaction ID : 11ai-000041039	
City Biddeford	State ME	Zip Code 04005-4047	Amount of Each Receipt this Period 35.00	
FEC ID number of contributing federal political committee. C			<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Buttercup Z, Inc.		Occupation (for Individual) Consultant		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 310.00		

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Boyajian, Margaret, Marilyn, ,			Date of Receipt MM / DD / YYYY 10 / 04 / 2016	
Mailing Address 63 Patricia Ln			Transaction ID : 11ai-000040464	
City Spruce Head	State ME	Zip Code 04859-4255	Amount of Each Receipt this Period 50.00	
FEC ID number of contributing federal political committee. C			<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) N/A		Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date ▼ 225.00		

SUBTOTAL of Receipts This Page (optional)..... ▶	585.00
TOTAL This Period (last page this line number only)..... ▶	



2016 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 623-3889 EMAIL: JNUTTING@MAINESTREETSOLUTIONS.COM	
REPORT	DUE DATE	REPORTING PERIOD	
11-DAY PRE-GENERAL REPORT	10/28/2016	10/01/2016 - 10/25/2016	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$16,450.00	\$49,750.00
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)	\$16,450.00	\$49,750.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$4,125.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$22,650.00	\$73,833.60
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$22,650.00	\$77,958.60
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$19,925.00	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$16,450.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$22,650.00	
12. CASH BALANCE AT END OF PERIOD	\$13,725.00	
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, JAY NUTTING, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: JAY NUTTING
 REPORT FILED ON: 10/28/2016
 LAST MODIFIED: 02/06/2017
 PRINTED: 06/29/2018
 COMMITTEE ID: 7934

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/12/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR CONTRIBUTION	OTH	\$500.00
10/14/2016	TRIBUTE FOR SPEAKER EVES 461 EIGHT ROD ROAD AUGUSTA, ME 04330	CONTRIBUTION FOR EVENT	FND	\$150.00
10/24/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION	CON	\$22,000.00
TOTAL OPERATING EXPENDITURES				\$22,650.00

EXHIBIT F

SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)	PAGE 96 OF 124
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
			<input type="checkbox"/> 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Pingree for Congress

Full Name (Last, First, Middle Initial) Gideon Leadership PAC		Date of Receipt M M / D D / Y Y Y Y 03 / 18 / 2016
Mailing Address PO Box 5307		Transaction ID : VR014FP38A9
City Augusta	State ME	Zip Code 04332-5307
FEC ID number of contributing federal political committee. C	Amount of Each Receipt this Period 250.00	
Name of Employer	Occupation	Memo Item
Receipt For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Election Cycle-to-Date 250.00	Comprised of Permissible Funds

Full Name (Last, First, Middle Initial) International Association of Firefighters Interested in Registration & Education PAC		Date of Receipt M M / D D / Y Y Y Y 03 / 29 / 2016
Mailing Address 1750 New York Ave NW		Transaction ID : VR014G6ZKC3
City Washington	State DC	Zip Code 20006-5301
FEC ID number of contributing federal political committee. C C00029447	Amount of Each Receipt this Period 1000.00	
Name of Employer	Occupation	Memo Item
Receipt For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Election Cycle-to-Date 1000.00	

Full Name (Last, First, Middle Initial) INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES POLITICAL ACTION TOGETHER POLITICAL COMMITTEE		Date of Receipt M M / D D / Y Y Y Y 01 / 29 / 2016
Mailing Address 7234 Parkway Dr		Transaction ID : VR014F4JGW0
City Hanover	State MD	Zip Code 21076-1307
FEC ID number of contributing federal political committee. C C00000885	Amount of Each Receipt this Period 1500.00	
Name of Employer	Occupation	Memo Item
Receipt For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Election Cycle-to-Date 3000.00	

SUBTOTAL of Receipts This Page (optional)	2750.00
TOTAL This Period (last page this line number only)	

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 1475 OF 1587
	<input type="checkbox"/> 11a <input type="checkbox"/> 11b <input checked="" type="checkbox"/> 11c <input type="checkbox"/> 11d <input type="checkbox"/> 12 <input type="checkbox"/> 13a <input type="checkbox"/> 13b <input type="checkbox"/> 14 <input type="checkbox"/> 15	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Cain for Congress

A. Full Name (Last, First, Middle Initial)
FRIENDS OF JIM CLYBURN

Mailing Address PO Box 12567

City Columbia State SC Zip Code 29211-2567

FEC ID number of contributing federal political committee. **C** C00255562

Name of Employer Occupation

Receipt For: 2016
 Primary General
 Other (specify) ▼

Election Cycle-to-Date ▼ 3000.00

Date of Receipt: 09 / 30 / 2016
Transaction ID : VNV5ESY825

Amount of Each Receipt this Period: 2000.00

Memo Item

B. Full Name (Last, First, Middle Initial)
Gideon Leadership PAC

Mailing Address PO Box 5307

City Augusta State ME Zip Code 04332-5307

FEC ID number of contributing federal political committee. **C**

Name of Employer Occupation

Receipt For: 2016
 Primary General
 Other (specify) ▼

Election Cycle-to-Date ▼ 750.00

Date of Receipt: 08 / 25 / 2016
Transaction ID : VNV5ER2TP0

Amount of Each Receipt this Period: 750.00

Memo Item

Comprised of Permissible funds

C. Full Name (Last, First, Middle Initial)
GOAL PAC

Mailing Address PO Box 30344

City Bethesda State MD Zip Code 20824-0344

FEC ID number of contributing federal political committee. **C** C00381996

Name of Employer Occupation

Receipt For: 2016
 Primary General
 Other (specify) ▼

Election Cycle-to-Date ▼ 5000.00

Date of Receipt: 09 / 30 / 2016
Transaction ID : VNV5ESXD70

Amount of Each Receipt this Period: 1000.00

Memo Item

SUBTOTAL of Receipts This Page (optional) ▶ 3750.00

TOTAL This Period (last page this line number only) ▶

EXHIBIT G

Support the work of the Maine Democratic Party today.

We rely on grassroots supporters like you to get our message out about building a fairer, more prosperous Maine. Your gift helps us train and support local leaders running for office, maintain our infrastructure, and build on the momentum of 2018 as we head into 2020. Can we count on you?

**Chip in now to help us fight for every
Mainer's fair shot at success.**

\$36 Details Payment

Card Number Expiration Date

XXXXXXXX 12/18 - 12/19

BACK CONTRIBUTE

Your contribution will benefit the Maine Democratic Party - Federal Account.


By clicking on the "Contribute" button you confirm that the following statements are true and accurate:

- I am not a foreign national who lacks permanent residence in the United States.
- This contribution is made from my own funds, and not those of another.
- This contribution is not made from the funds of a corporation or labor organization.
- This contribution is made on a personal credit card or debit card for which I have the legal obligation to pay, and is not made either on a corporate or business entity card or on the card of another person.
- I am at least eighteen years old.

Contributions or gifts are not tax deductible.

Overview of Request for Investigation of Sara Gideon & Gideon Leadership PAC

Sara Gideon Formed A State Leadership PAC In 2014:

	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		
	<p>2014 CAMPAIGN FINANCE REPORT</p> <p>FOR POLITICAL ACTION COMMITTEES</p>		
COMMITTEE GIDEON LEADERSHIP PAC 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032 PHONE: (207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		TREASURER JAY NUTTING PO BOX 5307 AUGUSTA, ME 04332 PHONE: (207) 622-7432 EMAIL: JNUTTING@VERRILLDANA.COM	
REPORT	DUE DATE	REPORTING PERIOD	
INITIAL FINANCIAL REPORT	05/28/2014	01/01/2014 - 05/28/2014	

<https://mainecampaignfinance.com/ReportOutputFiles/02/FSI17262.pdf>

Sara Gideon Was The Principal Officer Of The Gideon Leadership PAC:

PRINCIPAL OFFICER INFORMATION	
Hon. SARA GIDEON Principal Officer 37 SOUTH FREEPORT ROAD FREEPORT, ME, 04032	Public: (207) 865-9593 Email: SARAIGIDEON@GMAIL.COM

<https://mainecampaignfinance.com/#/exploreCommitteeDetail/4851>

The Principal Officer Of A Maine PAC Has Many Duties – Including Responsibility For “Any Spending Decisions” Of The PAC. Gideon signed a form stating such when the PAC was formed:



COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES
Mail: 135 State House Station, Augusta, Maine 04333
Office: 45 Memorial Circle, 2nd floor, Augusta, Maine

Website: www.maine.gov/ethics
Phone: 207-287-4179
Fax: 207-287-6775

ACKNOWLEDGMENT OF RESPONSIBILITIES — DECISION-MAKER

I, (print name) Sara Gideon, acknowledge that I am a decision-maker of Gideon Leadership PAC a political action committee registered with the Commission on Governmental Ethics and Election Practices (the “Commission”). I acknowledge that, as a decision-maker of the committee:

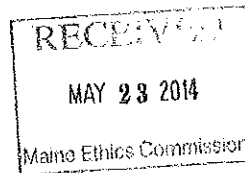
- (1) I am deemed to have participated in any spending decisions of the committee until the Commission has received notice of my resignation or involuntary removal from the committee.
- (2) I am responsible for notifying the Commission and the committee in writing if I resign from the position of decision-maker and that my resignation will not be effective until the Commission receives such notice.

I have read this acknowledgment and understand my responsibilities as a decision-maker.

Signature

Date

Failure to submit the Acknowledgment of Responsibilities may result in a fine of \$100.



Rev. Oct. 2013

(Maine Ethic Commission Filing, 5/23/14)

Giving-In-The-Name-Of-Another Scheme

Sarah Gideon was reimbursed at least two times by her Maine Leadership PAC for state campaign donations she personally made, totaling \$500.

On June 1, 2016, Gideon Leadership PAC Reported A \$250 Disbursement Purportedly To The House Democratic Campaign Committee But Listed As “Contribution – Reimbursement To Sara Gideon.”

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
6/1/2016	EMILY CAIN FOR CONGRESS PO BOX 1523 BANGOR, ME 04402	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	FND	\$250.00
6/1/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00

<https://mainecampaignfinance.com/ReportOutputFiles/02/FS129546.pdf>

On August 3, 2016, The House Democratic Campaign Committee Reported Receiving A \$250 Individual Contribution From State Rep. Sara Gideon Of Freeport, Maine.

8/3/2016	FAIRPOINT COMMUNICATIONS PO BOX 1058 WAYNE, ME 04284	DESCRIPTION: Unknown CONTRIBUTION	3	\$1,000.00
8/3/2016	SARA GIDEON 37 SOUTH FREEPORT RD FREEPORT, ME 04032	MAINE STATE LEGISLATURE DESCRIPTION: STATE REPRESENTATIVE CONTRIBUTION	1	\$250.00
8/3/2016	GO MAINE PAC		5	\$5,000.00

<https://mainecampaignfinance.com/ReportOutputFiles/02/FS127094.pdf>

On June 27, 2016, Gideon Leadership PAC Reported A \$250 Disbursement Purportedly To Golden Leadership Fund But Listed As "Contribution – Reimbursement To Sara Gideon."

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
6/1/2016	EMILY CAIN FOR CONGRESS PO BOX 1523 BANGOR, ME 04402	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	FND	\$250.00
6/1/2016	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. BOX 2021 AUGUSTA, ME 04338	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00
6/21/2016	FIRE AND CO. 102 YORK ST KENNEBUNKPORT, ME 04043	FOOD FOR EVENT	FOD	\$310.00
6/21/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR FUNDRAISING EXPENSES	FND	\$155.48
6/27/2016	GOLDEN LEADERSHIP FUND PO BOX 5307 AUGUSTA, ME 04332	CONTRIBUTION - REIMBURSEMENT TO SARA GIDEON	CON	\$250.00

<https://mainecampaignfinance.com/ReportOutputFiles/02/FS129546.pdf>

On June 25, 2016, Golden Leadership Fund Reported Receiving A \$250 Individual Contribution From State Rep. Sara Gideon Of Freeport, Maine.

DATE	PAYEE	DESCRIPTION	QUANTITY	AMOUNT
6/21/2016	LEWISTON, ME 04240 MARY ANNE TUROWSKI 2462 KENNEBEC ROAD NEWBURGH, ME 04444	INFO REQUESTED MAINE STATE EMPLOYEES ASSOCIATION	1	\$50.00
6/25/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	MAINE LEGISLATURE DESCRIPTION: STATE REPRESENTATIVE CONTRIBUTION	1	\$250.00
6/27/2016	CENTRAL DISTRIBUTORS 15 FOSS ROAD P.O. BOX 1938		3	\$250.00

<https://mainecampaignfinance.com/ReportOutputFiles/02/FS129792.pdf>

Sara Gideon was reimbursed at least four times by her Maine Leadership PAC for federal campaign donations she personally made, totaling \$2,750.

In Late September 2015, Sara Gideon Personally Donated \$1,000 To Emily Cain’s Federal Congressional Campaign:

Image# 201510159003026179

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

FOR LINE NUMBER: PAGE 78 OF 272
(check only one)
 11a 11b 11c 11d
 12 13a 13b 14 15

Use separate schedule(s) for each category of the Detailed Summary Page

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NAME OF COMMITTEE (In Full)
Cain for Congress

Full Name (Last, First, Middle Initial)
A. Sara I Gideon

Mailing Address 37 S Freeport Rd

City Freeport State ME Zip Code 04032-6100

FEC ID number of contributing federal political committee. C

Name of Employer State of Maine Occupation State Representative

Receipt For: 2016
 Primary General
 Other (specify)

Election Cycle-to-Date 1000.00

Date of Receipt 09 / 30 / 2015

Transaction ID : VNV75E10X81

Amount of Each Receipt this Period 1000.00

* Earmarked Contribution: See Below

<https://docquery.fec.gov/cgi-bin/fecimg/?201510159003026179>

The Following Month, Gideon’s Maine Leadership PAC Paid Sara Gideon For “Reimbursement For Federal Contribution” In The Amount Of \$1,000:

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/5/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR TRAVEL EXPENSES	TRV	\$624.20
10/11/2015	ACT BLUE PO BOX 441146 SOMERVILLE, MA 02144	PROCESSING FEES	OTH	\$71.12
10/28/2015	EMPOWERING MAINE LEADERSHIP PAC 110 SEWALL STREET AUGUSTA, ME 04330	CONTRIBUTION	CON	\$250.00
10/28/2015	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR FEDERAL CONTRIBUTION	OTH	\$1,000.00

<https://mainecampaignfinance.com/ReportOutputFiles/02/PS123981.pdf>

On June 13, 2016 Sara Gideon Personally Donated \$250 To Emily Cain's Federal Congressional Campaign:

Full Name (Last, First, Middle Initial) Sara I Gideon		Date of Receipt MM / DD / YYYY 06 / 13 / 2016
Mailing Address 37 S Freeport Rd		Transaction ID : VNVT5EEQZN5
City Freeport	State ME	Zip Code 04032-6100
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 250.00
Name of Employer State of Maine	Occupation State Representative	Memo Item
Receipt For: 2016 <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Election Cycle-to-Date 1400.00	* Earmarked Contribution: See Below

<https://docquery.fec.gov/cgi-bin/fecimg/?201607159020602262>

Just Days Earlier, Gideon's Leadership PAC Noted That It Had Reimbursed Sara Gideon For A "Contribution" To Emily Cain For Congress In The Amount Of \$250:

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and Internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
6/1/2016	EMILY CAIN FOR CONGRESS PO BOX 1523 BANGOR, ME 04402	CONTRIBUTION REIMBURSEMENT TO SARA GIDEON	FND	\$250.00

<https://mainecampaignfinance.com/ReportOutputFiles/02/FS129546.pdf>

On July 11, 2016 The Maine Democratic Party's Federal Account Received \$1,000 From Sara Gideon As Noted In Their FEC Report:

Full Name (Last, First, Middle Initial) B. Sara I. Gideon		Date of Receipt MM / DD / YYYY 07 / 11 / 2016
Mailing Address 37 S Freeport Rd		Transaction ID : 11a1-000038451
City Freeport	State ME	Zip Code 04032-6100
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 1000.00
Name of Employer Maine State Legislature	Occupation State Rep.	<input type="checkbox"/> Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 1000.00	

<https://docquery.fec.gov/cgi-bin/fecimg/?201608199022641516>

Just Days Later, Gideon's Leadership PAC Reimbursed Sara Gideon For "MDP Contribution" In The Amount Of \$1,000:

SCHEDULE B-1 OPERATING EXPENDITURES				
EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
7/21/2016	DANDELION CATERING 81 BRIDGE ST YARMOUTH, ME 04096	FOOD FOR FUNDRAISING EVENT - REIMBURSEMENT TO SARA GIDEON	FOD	\$551.00
7/25/2016	EMERGE MAINE PO BOX 3445 PORTLAND, ME 04101	CONTRIBUTION	FND	\$300.00
7/25/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR MDP CONTRIBUTION	OTH	\$1,000.00
7/25/2016	MAINE DEMOCRATIC STATE	CONTRIBUTION	CON	\$500.00

<https://mainecampaignfinance.com/ReportOutputFiles/02/FS129547.pdf>

On October 3, 2016 The Maine Democratic Party's Federal Account Received \$500 From Sara Gideon As Noted In Their FEC Report:

Image# 201610279036990779

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
 11a 11b 11c 12
 13 14 15 16 17

PAGE 15 OF 674

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NAME OF COMMITTEE (In Full)
Maine Democratic Party

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name
A. Gideon, Sara, L.,

Mailing Address 37 S Freeport Rd

City Freeport State ME Zip Code 04032-6100

Date of Receipt
10 / 03 / 2016
Transaction ID : 11a1-000040589

FEC ID number of contributing federal political committee. C

Amount of Each Receipt this Period
500.00

Name of Employer (for Individual) Maine State Legislature Occupation (for Individual) State Rep.

Receipt For:
 Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼
1500.00

Memo Item

<https://docquery.fec.gov/cgi-bin/fecimg/?201610279036990779>

Just Days Later, Gideon's Leadership PAC Reimbursed Sara Gideon For "Contribution" In The Amount Of \$500

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURES TYPES				
CNS	Campaign consultants	POL	Polling and survey research	
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Print and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.	
PHO	Phone banks, automated telephone calls			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/12/2016	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME 04032	REIMBURSEMENT FOR CONTRIBUTION	OTH	\$500.00

<https://mainecampaignfinance.com/ReportOutputFiles/02/FS129548.pdf>

Gideon Admitted that the Reimbursements Were Federal Campaign Finance Violations and Sent a Check for \$3,250 to the U.S. Treasury to “Offset” the Contributions.

LOCAL & STATE >

Posted August 1 | Updated August 2

Gideon campaign says error led to campaign finance violation

The Democrat’s campaign manager blames ‘incorrect guidance on how to process’ contributions.

BY MARINA VILLENEUVE ASSOCIATED PRESS

A spokeswoman for House Speaker Sara Gideon said Thursday that the candidate was given incorrect advice on reimbursements for political contributions she made in 2015 and 2016, which resulted in federal campaign finance violations.

Gideon is running to unseat Republican Sen. Susan Collins in 2020 and has made access to abortion rights and fighting corporate money in politics a focus of her campaign. Gideon quickly received the backing of the national Democratic Senatorial Campaign Committee in her bid to oust Collins, who has found her long-standing image as a moderate under fire in an increasingly polarized Washington.

The Democrat’s campaign manager said Thursday that Gideon’s fundraising committee received “incorrect guidance on how to process” such contributions.

“While these contributions were within the legal contribution limit and fully disclosed in public reporting, the fundraising committee was given incorrect guidance on how to process them,” Amy Mesner said in an emailed statement. “As soon as we were made aware of the error, it was addressed.”

Democratic congressional candidate Emily Cain reported a \$1,000 contribution from Gideon in 2015. Gideon’s PAC soon after paid Gideon \$1,000 as “reimbursement for a federal contribution.”

Gideon’s campaign said that on Wednesday Gideon sent a personal check for \$3,250 to the U.S. Treasury to offset such contributions.



Sara Gideon Joe Phelan/Kennebec Journal

<https://www.pressherald.com/2019/08/01/records-show-gideon-violated-federal-campaign-finance-law/>

The amount Gideon sent to the U.S. Treasury (\$3,250) is \$500 more than the total amount of reimbursed federal contributions. Presumably the extra \$500 represents the amount of reimbursed state contributions:

Sara Gideon ran afoul of election law with political donations in 2015 and 2016

The issue around her contributions was first reported by The Washington Free Beacon, a conservative news outlet. Election law experts said the contributions — which totaled at least \$2,750 — were a clear-cut violation.

In 2015, Gideon contributed \$1,000 to Emily Cain, who was the Democratic candidate running for the seat in Maine's 2nd Congressional District. Nearly a month later, Gideon's state political action committee paid her \$1,000, calling it a "reimbursement for federal contribution."

That committee, Gideon Leadership PAC, which has largely been used to bolster Democratic legislative campaigns, reimbursed Gideon three more times through 2016 for \$1,750 more in contributions to Cain and the federal campaign arm of the Maine Democratic Party.

<https://bangordailynews.com/2019/08/01/politics/sara-gideon-ran-afoul-of-federal-election-law-with-political-donations-in-2015-and-2016/>

Maine Law Prohibits Contributions in Another's Name:

§1003

Title 21-A: ELECTIONS

§1004-A

Spotlight Search

§1004. Violations

The violation of any of the following subsections is a Class E crime. {1985, c. 161, §6 (NEW).}

1. Contributions and expenditures. A person, candidate, treasurer, political committee or political action committee may not knowingly make or accept any contribution or make any expenditure in violation of this chapter.

{ 1991, c. 839, §2 (AMD); 1991, c. 839, §34 (AFF) .}

2. False statements. A person, candidate, treasurer or political action committee may not make a false statement in a report required by this chapter.

{ 2003, c. 447, §36 (AMD) .}

3. Contributions in another's name. A person may not knowingly:

A. Make a contribution in the name of another person; {2003, c. 447, §37 (NEW).}

B. Permit the person's name to be used to accomplish a contribution in violation of paragraph A; or {2003, c. 447, §37 (NEW).}

C. Accept a contribution made by one person in the name of another person. {2003, c. 447, §37 (NEW).}

{ 2003, c. 447, §37 (RER) .}

4. Registration, political action committees. A political action committee or ballot question committee required to be registered under section 1052-A or 1056-B may not operate in this State unless it is so registered.

{ 2013, c. 334, §1 (AMD) .}

SECTION HISTORY

1985, c. 161, §6 (NEW). 1989, c. 504, §52, §1 (AMD). 1991, c. 839, §2 (AMD). 1991, c. 839, §34 (AFF). 2003, c. 447, §36-38 (AMD). 2013, c. 334, §1 (AMD).

<https://legislature.maine.gov/statutes/21-A/title21-Asec1004.html>

The Maine Ethics Commission's website reminds regulated entities of this prohibition:

Making a Contribution in the Name of Another

No person may make a contribution in the name of another person or knowingly permit his name to be used to accomplish such a contribution. No person may knowingly accept a contribution made by one person in the name of another. The contributor identified in reports submitted to the Ethics Commission must be the actual source of funds for the contribution.

Violating this restriction is a Class E crime and may subject the violator to civil penalties.

<http://www.maine.gov/ethics/political-activity/contributing-information>



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

August 23, 2019

Hon. Sara I. Gideon
37 South Freeport Road
Freeport, Maine 04032

Dear Speaker Gideon:

Yesterday, the Maine Commission on Governmental Ethics and Election Practices received a written request from Mr. Edward Youngblood to investigate whether you or the Gideon Leadership PAC made contributions in the name of another, in violation of 21-A M.R.S. § 1004(3). Under our agency rules, all requests for investigations are scheduled for preliminary consideration by the members of the Commission at a public meeting. (94-270 C.M.R. Ch. 1, § 4(2)(C)) At this preliminary stage, the Commissioners will typically decide whether to direct the staff to conduct an investigation or whether to take any other action on the investigation request.

The Commission staff is tentatively planning to schedule Mr. Youngblood's request for the Commission's meeting on September 25, 2019. If this does not provide you with sufficient time to respond, however, you may request that this matter be scheduled for the Commission's October meeting instead. A date has not been selected for that meeting.

Relevant Law

Financial reporting. Under Maine campaign finance law, candidates for state office, political action committees, and party committees are required to report all contributions they have received above certain monetary thresholds, including the date and amount of the contribution and the name and address of the contributor. (21-A M.R.S. §§ 1017(5), 1017-A(1) & 1060(6)) Accurate reporting of contributors is important for members of the public to understand the actual sources of contributions received by candidates and committees. Accurate contributor reporting is also important to verify compliance with contribution limits and other disclosure requirements.

Misidentifying a contributor. Maine campaign finance law forbids a person from knowingly making a contribution in the name of another person or allowing their name to be used for this purpose. (21-A M.R.S. §§ 1004(3)(A) & (B)) Violations of these restrictions are a Class E crime, and can result in the assessment of civil penalties. (21-A M.R.S. §§ 1004(3) & 1004-A(3))

Contributing through an intermediary. If a contributor directs that a contribution to a candidate be made through an intermediary or a conduit, Maine campaign finance law requires the intermediary or conduit to advise the candidate of the original source of the contributions. (21-A M.R.S. § 1015(4)) This provision is necessary so that contributors do not circumvent contribution limits by channeling their contributions through an intermediary or conduit. Maine law does not contain a similar provision for contributions made through an intermediary to a PAC or party committee. Nevertheless, the Commission staff would advise (if asked) that if a PAC or party committee receives a contribution through an intermediary, the original source of the contribution should be reported as the contributor.

Federal Compliance Issues

Maine campaign finance law governs contributions and expenditures to influence elections for state offices and ballot questions. The Commission “does not have jurisdiction over financial activities to influence” federal candidate elections. (21-A M.R.S. § 1011)

Accordingly, the Commission lacks authority to consider Mr. Youngblood’s contentions that federal law required the Gideon Leadership PAC to register as a federal political committee and segregate contributions received from corporations. If the Commissioners decide to take any action on this complaint, the Commission staff’s suggestion will be that they focus on the contributions to the two Maine-based PACs: the House Democratic Campaign Committee and the Golden Leadership Fund.

Request for Response

Preliminarily, the Commission staff proposes to schedule this matter for the next regular meeting of the Commission on September 25, 2019. The meeting would begin at 9:00 a.m. at the Commission’s office at 45 Memorial Circle in Augusta. At the meeting, the

Hon. Sara I. Gideon
Page 3
August 23, 2019

Commissioners would decide whether to conduct an investigation into this matter or take any other action on Mr. Youngblood's request.

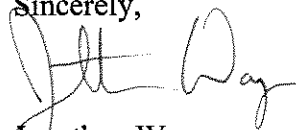
If this scheduling is acceptable, please submit a written response to Mr. Youngblood's request for investigation no later than Wednesday, September 11, 2019. In your response, you are welcome to include any information or legal argument you believe is relevant. We suggest addressing the following issues:

- Please verify the dates on which you and the Gideon Leadership PAC made the six contributions and six reimbursements set out in Attachment A. How were the contributions and reimbursements made (*i.e.*, by check, online method)? If any of the amounts are incorrect, please indicate that.
- Please explain why the Gideon Leadership PAC made contributions through you, rather than contributing to the recipient committees directly.
- Provide any legal argument that responds to Mr. Youngblood's contention that you and/or the Gideon Leadership PAC violated 21-A M.R.S. § 1004(3) by making contributions in the name of another person.

If you need more time to respond and would like this matter scheduled for the October meeting, please notify me by email.

Thank you for your cooperation with this request. If you have any questions, please email me at Jonathan.Wayne@maine.gov or call me at (207) 287-4179.

Sincerely,



Jonathan Wayne
Executive Director

cc: Hon. Edward Youngblood

Attachment A - Contributions and Reimbursements - Gideon Leadership PAC (REVISED)

**Reimbursements to Sara Gideon
(as reported by Gideon Leadership PAC)**

Contributions Reported by Recipient Committees

Recipient Committee	Reported Date	Reported Amount	Reported Contributor	Reported Payee	Reported Date	Reported Amount	Explanation of Purpose
Cain for Congress (Exh. B)	9/30/2015	\$1,000.00	Sara I Gideon	Sara Gideon	10/28/2015	\$1,000.00	Reimbursement for federal contribution
Cain for Congress (Exh. C)	6/13/2016	\$250.00	Sara I Gideon	Emily Cain for Congress	6/1/2016	\$250.00	Contribution - Reimbursement to Sara Gideon
House Democratic Campaign Committee (Exh. D)	8/3/2016	\$250.00	Sara Gideon	House Democratic Campaign Committee	6/1/2016	\$250.00	Contribution - Reimbursement to Sara Gideon
Golden Leadership Fund (Exh. E)	6/25/2016	\$250.00	Sara Gideon	Golden Leadership Fund	6/27/2016	\$250.00	Contribution - Reimbursement to Sara Gideon
Maine Democratic State Committee (Federal account) (Exh. F)	7/11/2016	\$1,000.00	Sara I. Gideon	Sara Gideon	7/25/2016	\$1,000.00	Reimbursement for MDP contribution
Maine Democratic State Committee (Federal account) (Exh. G)	10/3/2016	\$500.00	Sara I. Gideon	Sara Gideon	10/12/2016	\$500.00	Reimbursement for contribution



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

August 29, 2019


Benjamin K. Grant, Esq.
McTeague, Higbee, Case, Cohen,
Whitney & Toker, P.A.
P.O. Box 5000
Topsham, Maine 04086

Edward Youngblood
735 North Main Street
Brewer, Maine 04412

Dear Sirs:

This letter is to confirm that the Maine Commission on Governmental Ethics and Election Practices has rescheduled its consideration of Edward Youngblood's request for investigation for its meeting on Wednesday, October 30, 2019. The meeting will take place at 9:00 a.m. at the Commission's office at 45 Memorial Circle in Augusta. Please submit Ms. Gideon's response no later than Tuesday, October 15, 2019.

Thank you for your cooperation with this request. If you have any questions, please email me at Jonathan.Wayne@maine.gov or call me at (207) 287-4179.

Sincerely,

Jonathan Wayne
Executive Director



McTEAGUE HIGBEE

LAWYERS. ALLIES. ADVOCATES.

October 15, 2019

BY FIRST CLASS MAIL AND EMAIL

Jonathan Wayne
Executive Director
Maine Commission on Governmental Ethics & Election Practices
135 State House Station
Augusta, ME 04333-0135

Re: Youngblood Request for Investigation of Gideon Leadership PAC

Dear Mr. Wayne:

We write as counsel to Speaker Sara Gideon and Gideon Leadership PAC (the “PAC”) (collectively, “Respondents”), in response to the complaint and request for investigation dated August 20, 2019, filed by Edward Youngblood in consultation with the National Republican Senatorial Committee and the Maine Republican Party.

Mr. Youngblood’s complaint centers on two state-level and four federal-level contributions made more than three years ago. Mr. Youngblood alleges that Speaker Gideon received reimbursement from her PAC for these contributions in violation of Maine and federal campaign finance law, using as evidence the fact that these reimbursements were reported on the PAC’s campaign finance reports filed with the Maine Commission on Governmental Ethics and Election Practices (“Commission”).

Mr. Youngblood attempts to characterize this mistake as a “scheme” to violate Maine and federal prohibitions against the giving of political contributions in the name of another. However, as explained below, all evidence indicates that these reimbursements were made because the PAC and Speaker Gideon believed that they were permissible. Mr. Youngblood appears to agree, admitting to the press that Speaker Gideon “may very well have been misled and probably was.”¹ Given the inadvertent nature of the violation Mr. Youngblood alleges and the small monetary amount—\$500—of the alleged violation within the Commission’s jurisdiction, as well as the

¹ See Michael Shepherd, *Democratic U.S. Senate hopeful Sara Gideon slapped with Republican ethics complaints*, BANGOR DAILY NEWS (Aug. 22, 2019), <https://bangordailynews.com/2019/08/22/politics/democratic-u-s-senate-hopeful-sara-gideon-slapped-with-republican-ethics-complaints/>.

other mitigating factors detailed below, the Commission should decline Mr. Youngblood's request for an investigation and take no further action on this complaint.

THE FEDERAL CONTRIBUTIONS

Mr. Youngblood has alleged that Respondents violated federal campaign finance law when Speaker Gideon made four contributions to federal political committees for which the PAC reimbursed her. Mr. Youngblood acknowledges that the Commission does not have jurisdiction over alleged violations of federal campaign finance law, but still asks the Commission to evaluate whether Respondents' federal activities conform with the Legislative Code of Ethics, which requires legislators to abide by "high moral and ethical standards."² Because federal campaign finance activity is not within the Commission's jurisdiction, and because Mr. Youngblood has not filed a proper legislative ethics complaint with the Commission, the Commission should decline to further investigate Mr. Youngblood's allegations regarding these contributions.

First, as the law clearly provides, and as Mr. Youngblood admits, "[t]he commission does not have jurisdiction over financial activities to influence the nomination or election of candidates for federal office."³ Further, Mr. Youngblood has pointed to no provision of Maine campaign finance law that the contributions to the federal committees violated, because such contributions did not violate Maine campaign finance law in any respect. Therefore, these alleged violations are not properly before the Commission under its campaign finance enforcement authority and should be dismissed.

Second, the allegations Mr. Youngblood has raised in his complaint are not the proper subject of a legislative ethics investigation. The Commission has the authority "[t]o investigate and make advisory recommendations to the appropriate body of any apparent violations of legislative ethics,"⁴ which is explicitly defined as "a violation of the prohibitions in section 1014 or 1015."⁵ The prohibitions in Sections 1014 and 1015 are as follows: situations involving conflicts of interest, undue influence, the abuse of office or position, entering into government contracts under certain circumstances, and soliciting or accepting campaign contributions from lobbyists during a legislative session.⁶ Violating the Legislative Code of Ethics is not listed in Sections 1014 and 1015.⁷

Maine law is clear that a legislative ethics complaint before the Commission may only be based on Sections 1014 and 1015. "Any person may file a complaint against a Legislator alleging a violation of legislative ethics *only as described* in sections 1014 and 1015."⁸ The complaint "must specify the facts of the alleged violation citing the specific provisions of sections 1014 and 1015 that are alleged to have been violated, the approximate date of the alleged violation and

² Youngblood Request at 5.

³ Me. Rev. Stat. tit. 21-A, § 1011.

⁴ Me. Rev. Stat. tit. 1, § 1008(1).

⁵ *Id.* § 1012(10).

⁶ *Id.* §§ 1014, 1015.

⁷ *See id.* § 1023; *see generally id.* §§ 1001 *et seq.*

⁸ *Id.* § 1013(2)(B-1) (emphasis added).

such other information as the commission requires.”⁹ “A complaint that does not meet the criteria [described above] is considered incomplete and will not be forwarded to the commission.”¹⁰ Mr. Youngblood’s complaint does not allege any facts indicating that Speaker Gideon violated Sections 1014 or 1015. As such, the complaint is deficient as a legislative ethics complaint and requires no further consideration by the Commission on those grounds.¹¹

STATE CONTRIBUTIONS

I. Factual Background

The Commission has requested that Respondents verify the dates, amounts, and payment methods of the contributions and reimbursements. The Committee has confirmed the following regarding the contributions over which the Commission has jurisdiction:

- On June 25, 2016, Golden Leadership Fund, a Maine political action committee, reported receiving a \$250 contribution from Speaker Gideon.¹² The PAC reports issuing a \$250 payment described as a reimbursement to Speaker Gideon on June 27, 2016.¹³
- On August 3, 2016, the House Democratic Campaign Committee, a Maine political action committee, reported receiving a \$250 contribution from Speaker Gideon.¹⁴ The PAC reports issuing a \$250 payment described as a reimbursement to Speaker Gideon on June 1, 2016.¹⁵

Based on a review of contemporaneous records, it appears that the reported reimbursements were made as part of a \$1,446 check issued to Speaker Gideon on June 30, 2016, which encompassed several expenses she had incurred on behalf of the PAC.

When Respondents were alerted to a potential issue with the contributions, they took prompt remedial action. Speaker Gideon immediately disgorged payments she received from the PAC to the United States Department of Treasury. Additionally, the Respondents informed the recipient committees of the circumstances surrounding these contributions so that they could ensure that the public record was complete.

II. Legal Analysis

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.* Even if the facts alleged in Mr. Youngblood’s complaint were the proper subject of a legislative ethics investigation, his 2019 complaint concerning events taking place 2015 and 2016 would be time-barred. *See id.* § 1013(2)(B-1)(2) (“The commission shall consider only complaints against Legislators in office at the time of the filing of the complaint and only complaints relating to activity that occurred or was ongoing within 2 years of the complaint.”).

¹² Golden Leadership Fund, 42-Day Post-Primary Report (July 26, 2016, amended Apr. 10, 2017).

¹³ Gideon Leadership PAC, 42-Day Post-Primary Report (July 26, 2016, amended Feb. 6, 2017).

¹⁴ House Democratic Campaign Committee, October Quarterly Report (Oct. 5, 2016) (original).

¹⁵ Gideon Leadership PAC, 42-Day Post-Primary Report (July 26, 2016, amended Feb. 6, 2017).

Mr. Youngblood has accused Respondents of “operating an unlawful giving-in-the-name-of-another scheme in direct violation of Me. Rev. Stat. tit. 21-A, § 1004,”¹⁶ which provides that “[a] person may not knowingly: . . . [m]ake a contribution in the name of another person” or “[p]ermit the person’s name to be used to accomplish a contribution” in the name of another.¹⁷ As acknowledged above, Speaker Gideon did receive two payments from the PAC following contributions she made to two Maine committees in the summer of 2016. However, the circumstances and the small total amount of \$500 indicate that this was no scheme, but rather an error caused by the fact that Respondents were not aware that such transactions were impermissible.

First, Mr. Youngblood’s ability to trace this “scheme” through the PAC’s campaign finance reports belies his characterization of what happened as a scheme. Neither the PAC nor Speaker Gideon attempted to deceive anyone, as evidenced by the fact that the PAC timely reported payments to Speaker Gideon in the PAC’s 42-Day Post-Primary Report and described them as “reimbursements.”¹⁸ As these prompt disclosures demonstrate, Respondents were operating based on a good faith belief that the payments were permissible.

Second, there was no apparent bad motive. Neither recipient of Speaker Gideon’s contributions was subject to any contribution limits or strict source restrictions. Because the PAC could have made these contributions itself, Speaker Gideon’s contributions did not have the effect of circumventing any campaign finance restrictions.

Given that these \$500 in payments resulted from an honest mistake, which Respondents acknowledge in this response; the funds paid to Speaker Gideon have been disgorged; the public record is clear; and the PAC is closed, there is no need for the Commission to devote any more resources to this matter by opening an investigation or finding that a violation of the law occurred.

If, however, the Commission does choose to take further action on this matter, the law weighs against any penalty on these facts.

Maine law provides that “[a] person that makes a contribution in the name of another person, or that knowingly accepts a contribution made by one person in the name of another person, may be assessed a penalty not to exceed \$5,000.”¹⁹ “In determining any penalty under [this] subsection[], the commission shall consider, among other things, the level of intent to mislead, the penalty necessary to deter similar misconduct in the future and the harm suffered by the public from the incorrect disclosure.”²⁰

There are three distinct types of conduit contribution violations described in Me. Rev. Stat. tit. 21-A, § 1004(3): (A) knowingly making a contribution in the name of another person; (B) knowingly permitting one’s name to be used to accomplish a contribution in the name of another

¹⁶ Youngblood Request at 1.

¹⁷ Me. Rev. Stat. tit. 21-A, § 1004(3)(A), (B).

¹⁸ See Gideon Leadership PAC, 42-Day Post-Primary Report (July 26, 2016, amended Feb. 6, 2017).

¹⁹ Me. Rev. Stat. tit. 21-A, § 1004-A(3).

²⁰ *Id.* § 1004-A.

person; and (C) knowingly accepting a contribution made by a person in the name of another person.²¹ Mr. Youngblood alleges that the PAC engaged in the first type of violation and that Speaker Gideon engaged in the second.

Me. Rev. Stat. tit. 21-A, § 1004-A specifies penalties for the first and third type of violation, but not the second.²² Indeed, the statute specifies no type of penalty that should be assessed for the type of violation of which Mr. Youngblood accuses Speaker Gideon. As such, the Respondents should not be subject to any penalties for their alleged violations of Section 1004(3)(B).

Further, while the PAC is alleged to have committed a 1004(3)(A) violation, for which the statute does specify penalty, the circumstances of this alleged violation likewise weigh against a penalty.

First, as explained above, the evidence indicates no intent to mislead the public. The PAC timely disclosed its payments to Speaker Gideon as “reimbursements,” including in its campaign finance report the dates, amounts, and ultimate recipients of the contributions. Additionally, the “conduit” in question here bore the same name as the PAC, further demonstrating that neither the PAC nor Speaker Gideon intended to obscure the identity of the donor.

Second, there is no risk of a future violation from any of the Respondents, and therefore, no need to deter any future violations. The PAC was disbanded on June 20, 2019 and therefore cannot make any more contributions or other expenditures. Additionally, now that Respondents have been alerted to the issues involved in this complaint, Respondents will avoid any potential violation going forward.

Third, the harm to the public from these events was insubstantial. The contributions in question totaled \$500, a fraction of the contributions the PAC made during the reporting period in which the contributions occurred, and a fraction of the contributions that the Golden Leadership Fund and the House Democratic Campaign Committee received during that reporting period.²³ Further, the PAC reported that the Golden Leadership Fund and the House Democratic Campaign Committee received the contributions in question on its 42-Day Post-Primary Report, disclosing all the information that it would have disclosed had it made the contributions directly. And finally, the House Democratic Campaign Committee has amended its 2016 42-Day-Report to indicate that the contribution it received was from the PAC rather than Speaker Gideon.²⁴

²¹ *Id.* § 1004(3).

²² *Id.* § 1004-A(3).

²³ See Gideon Leadership PAC, 42-Day Post-Primary Report (July 26, 2016, amended Feb. 6, 2017) (disclosing that the PAC made \$2,625 in contributions to Maine candidates and committees during that reporting period, excluding the two reimbursements); House Democratic Campaign Committee, October Quarterly Report (Oct. 5, 2016, amended Sept. 16, 2019) (disclosing that the PAC received \$454,530 in contributions that period, including the \$250 it received from Speaker Gideon); Golden Leadership Fund, 42-Day Post-Primary Report (July 26, 2016) (disclosing that the PAC received \$4,270 in contributions that period, including the \$250 it received from Speaker Gideon).

²⁴ House Democratic Campaign Committee, October Quarterly Report (Oct. 5, 2016, amended Sept. 16, 2019).

Jonathan Wayne
October 15, 2019
Page 6

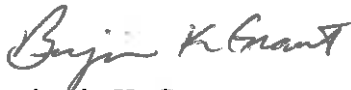
Given the small amount and inadvertent nature of the alleged violations, the Commission should decline Mr. Youngblood's request to open an investigation and take no further action on this matter, including the imposition of a penalty.

CONCLUSION

As previously disclosed in the public record and as acknowledged above, Speaker Gideon made two contributions to state committees, after which the Gideon Leadership PAC made payments to Speaker Gideon that were reported as reimbursements. When these payments were made, Respondents were unaware that these transactions presented even the appearance of any violation. After being alerted to the issues involved, Speaker Gideon disgorged the funds to the United States Department of Treasury.

The Commission is an independent and balanced body of two Democratic and two Republican members. This balance ensures a fair process for any respondent, regardless of their party affiliation. As such, Respondents are confident that the Commission will decide, due to the small and inadvertent nature of the alleged violation and the other mitigating factors described above, to decline Mr. Youngblood's request to open an investigation into his allegations and close this matter without taking further action.

Very truly yours,



Benjamin K. Grant
McTeague, Higbee, Case, Cohen, Whitney & Toker, P.A.
4 Union Park, P.O. Box 5000
Topsham, ME 04086
Counsel to Respondents

cc: Marc E. Elias
Jacquelyn K. Lopez
Andrea T. Levien
Perkins Coie LLP
700 13th St. NW, Ste. 600
Washington, DC 20005
Counsel to Respondents

MEMORANDUM

To: Commission
From: Michael J. Dunn, Political Committee and Lobbyist Registrar
Date: October 18, 2019
Re: Summary of Mr. Youngblood's FEC complaint against Ms. Gideon and her PAC

INTRODUCTION

The purpose of this memorandum is to summarize the Complaint filed by Mr. Edward Youngblood (hereinafter, "Mr. Youngblood") against Ms. Sara Gideon and the Gideon Leadership PAC (hereinafter, "Ms. Gideon," "PAC," and collectively, the "Respondents") now pending before the Federal Election Commission (hereinafter, "FEC"). This Memorandum does not offer an opinion on the merits of the Complaint or provide any analysis by the Commission staff.

ALLEGED FEDERAL LAW VIOLATIONS

The Complaint alleges the following three (3) violations.

I. The Respondents violated the federal prohibition on giving in the name of another.

Federal law prohibits a person from making "a contribution in the name of another person or [to] knowingly permit his name to be used to effect such a contribution." 52 U.S.C. § 30122. A person who gives money, which was provided by another person (the original source), without disclosing the original source of the funds to the recipient is deemed to have made a contribution in the name of another. 11 C.F.R. § 110.4(b)(2)(i). Additionally, it is unlawful to "knowingly help or assist another person in making" such a contribution. Id. at § 110.4(b)(1)(iii).

Here, the allegations are that on or about 9/30/2015, 6/13/2016, 7/11/2016, and 10/03/2016, Ms. Gideon made contributions to Emily Cain for Congress and to the federal account of the Maine Democratic Party, totaling \$2,750.¹ Additionally, on or about 10/28/2015, 6/1/2016,² 7/25/2016, and 10/12/2016, the PAC reimbursed Ms. Gideon a total of \$2,750 for making the contributions to Cain for Congress and the federal account of the Maine Democratic

¹ Cain for Congress received \$1,250, and the Maine Democratic Party received \$1,500.

² The PAC's State filing indicates the reimbursement was made on 6/1/2016, but the Cain for Congress filing indicates the contribution was received on 6/13/2016.

Party. Accordingly, Mr. Youngblood alleges a cause of action against the Respondents because Ms. Gideon contributed to federal committees, was reimbursed by the PAC, and failed to disclose the original source of the funds in violation of 52 U.S.C. § 30122 and associated regulations.

II. The Respondents violated the federal requirement to register as a political committee. Federal law defines a “political committee” as any committee, club, association, or other group of persons that receives contributions or makes expenditures aggregating more than \$1,000 in a calendar year related to a federal campaign. 11 C.F.R. § 100.5. A political committee must register with the FEC within ten (10) business days after exceeding the \$1,000 threshold. 11 C.F.R. § 102.1.

Here, the allegations are that the PAC was required to register with the FEC and failed to do so. In addition to the \$2,750 in contributions discussed in part I, the PAC made direct contributions to federal candidates, Pingree for Congress and Cain for Congress, totaling \$1,000 on 3/14/2016 and 8/21/2016. Since the \$2,750 in contributions made by Ms. Gideon were made by the PAC, Mr. Youngblood asserts the PAC would have been required to register with the FEC. Accordingly, Mr. Youngblood alleges a cause of action against the Respondents because his position is that the \$2,750, paid by Ms. Gideon and reimbursed to her by the PAC, should be included in the federal contributions made directly by the PAC, and that the PAC would then have had to register with the FEC, which it failed to do in violation of 11 C.F.R. § 102.1.

III. The Respondents failed to segregate impermissible funds from their contributions.

Federal law requires that a political committee that finances political activity in connection with both federal and non-federal elections shall establish a separate fund as a depository for contributions for the federal elections if the committee accepts funds that are prohibited under federal law.³ 11 C.F.R. § 102.5(1)(a)(i). Prohibited contributions include any contributions from corporations. 52 U.S.C. § 30118.

Here, Mr. Youngblood alleges that the PAC raised \$57,500 from corporate contributions and an additional \$17,000 in contributions from other state political action committees during

³ Alternatively, a committee could form a separate committee solely for federal elections. 11 C.F.R. § 102.5(1)(a)(ii).

2015 and 2016, both of which are in violation of § 30118. The Complaint does not include specific itemizations supporting the \$57,500 and \$17,000 totals. Rather, the Complaint references the Maine Campaign Finance website. Accordingly, Mr. Youngblood alleges a cause of action against the Respondents because the campaign failed to segregate federal campaign funds and may have contributed impermissible funds to influence a federal election in violation of 11 C.F.R. § 102.5(1)(a).

CONCLUSION

This Memorandum summarizes the allegations in Mr. Youngblood's complaint that is now pending before the FEC. If the Commission would like any additional information or analysis from the Commission staff, please let us know.

NATIONAL EXAMPLES OF GIVING IN THE NAME OF ANOTHER

1. In In the Matter of American Conservative Union, et al., F.E.C. MUR 6920 (2017), the Now or Never PAC received \$1.7 million in contributions from the American Conservative Union (“ACU”). After investigation, the FEC found that another organization, Government Integrity, LLC (“GI”), donated \$1.8 million to ACU the same day that ACU made the \$1.7 million contribution to the Now or Never PAC. Now or Never PAC reported ACU as the Contributor, not GI. The FEC and the respondents entered a conciliation agreement which required the payment of a \$350,000 penalty.
2. In United States v. Liberty, No. 2:16-CR-144-DBH (D. Me. Aug. 28, 2017), the defendant, Mr. Michael Liberty, directed and reimbursed nine (9) family members and employees to make a total of \$22,500 in contributions to a federal campaign. Mr. Liberty was sentenced to four (4) months in jail and fined \$100,000, after pleading guilty.
3. In United States v. Tong, No. 4:17-cr-00474-JST (D. N. Ca. Oct. 10, 2019), the defendant, Mr. James Tong, used two straw donor organizations to funnel contributions through a network of individuals who would then make contributions to federal campaigns under their own names. A total of \$38,000 was contributed across two elections in this manner. Mr. Tong was found guilty by a federal court jury in Oakland, California in October 2019, he will be sentenced on December 13, 2019 and faces up to four (4) years in prison and \$38,000 in fines.
4. In State v. Newton, 330 Conn. 344 (2018), the defendant, Mr. Newton, ran for election under Connecticut’s clean election program. Due to an accounting error, Mr. Newton believed he had raised the required \$15,000 to qualify for clean election funds, but after review, the Ethics Commission informed his treasurer that he was \$490 short of the \$15,000 requirement. That same day, the campaign’s treasurer found \$500 sitting on her desk with five (5) required certification cards. The jury found that the five (5) individuals who had signed the certification cards did so after members of the campaign instructed them to sign the cards and told them that they did not have to make a contribution. The \$500 came from Mr. Newton’s personal funds. Mr. Newton was sentenced to six (6) months imprisonment pending appeal. On appeal the Connecticut Supreme Court reversed and remanded for a new trial due to an improper jury instruction.

LEGISLATIVE CODE OF ETHICS

Legislative service is one of democracy's worthiest pursuits. A Maine Legislator is charged with civility and responsible conduct inside and outside of the State House commensurate with the trust placed in that Legislator by the electorate.

In a free government, a Legislator is entrusted with the security, safety, health, prosperity, respect and general well-being of those the Legislator serves and with whom the Legislator serves.

To work well, government requires a bond of trust and respect between citizens and their Legislators. With such a trust, high moral and ethical standards producing the public's confidence, with the reduction to a minimum of any conflict between private interests and official duties, should be observed.

No Maine Legislators will accept any employment that will impair their independence and integrity of judgment nor will they exercise their position of trust to secure unwarranted privileges for themselves or for others. The Maine Legislator will be ever mindful of the ordinary citizen who might otherwise be unrepresented and will endeavor conscientiously to pursue the highest standards of legislative conduct inside and outside of the State House.

Adopted by the 100th Legislature

Amended by the 127th Legislature

Politics

Sara Gideon ran afoul of election law with political donations in 2015 and 2016



Troy R. Bennett | BDN

Maine Speaker of the House, Sara Gideon, D-Freeport.

ETH-127

By **Michael Shepherd**, BDN Staff
August 1, 2019 11:48 am
Updated: August 1, 2019 6:26 pm

Maine House Speaker Sara Gideon, a Democratic candidate in the 2020 race to unseat U.S. Sen. Susan Collins, ran afoul of federal election law by using a state political committee funded partially by corporations to reimburse herself for donations in 2015 and 2016.

Gideon's campaign said Thursday that the committee got "incorrect guidance" on how to process the donations and that the candidate sent a check to the U.S. Treasury in an amount covering the total cost of the contributions because the state committee is dissolved.

A centerpiece of Gideon's campaign against Collins, a Republican, has been a pledge to not accept contributions from corporate political committees. Gideon's committee, however, **raised 60 percent of its money** from commercial sources between 2014 and early 2019, according to state records.

The issue around her contributions was **first reported by The Washington Free Beacon**, a conservative news outlet. Election law experts said the contributions — which totaled at least \$2,750 — were a clear-cut violation.

In 2015, **Gideon contributed \$1,000 to Emily Cain**, who was the Democratic candidate running for the seat in Maine's 2nd Congressional District. Nearly a month later, Gideon's state political action committee paid her \$1,000, calling it a "reimbursement for federal contribution."

That committee, Gideon Leadership PAC, which has largely been used to bolster Democratic legislative campaigns, reimbursed Gideon three more times through 2016 for \$1,750 more in contributions to Cain and the federal campaign arm of the Maine Democratic Party.

Federal and **Maine** election law prohibit these “ **contributions in the name of another.**” Federal law bars corporations from donating to candidates and party committees, while Maine allows corporate contributions to both candidates and state political action committees.

“While these contributions were within the legal contribution limit and fully disclosed in public reporting, the fundraising committee was given incorrect guidance on how to process them,” said Amy Mesner, Gideon’s campaign manager, in a Thursday statement. “As soon as we were made aware of the error, it was addressed.”

Eric Wang, a lawyer who formerly worked for a Republican commissioner, called the mistake “bone-headed” and said Gideon “should know better.” Erin Chlopak, a former head of the Federal Election Commission’s policy division, said the filing indicates “a pretty clear-cut straw donor” situation, but it didn’t look intentional because the filings disclosed the reimbursements.

“Typically, when people try to break the law, they try to be more discreet about it,” said Chlopak, who now works for the nonpartisan Campaign Legal Center.

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By **History Daily**

Gideon is among five Democrats running for Collins’ seat alongside lobbyist Betsy Sweet of Hallowell, Saco lawyer Bre Kidman, retired Air Force major general Jonathan Treacy of Oxford and travel agent Michael Bunker of Bangor. Gideon and Sweet, the third-place finisher in the 2018 Democratic gubernatorial primary, are the best-known candidates in the field.

The House speaker is backed by the campaign arm of Senate Democrats and groups including **End Citizens United**, whose goal is to “end big money in politics.” Sweet is backed by progressive groups, including Justice Democrats, which is credited for helping to elect U.S. Rep. Alexandria Ocasio-Cortez, D-New York.

Sweet has said her fundraising will be centered on small donors and questioned Gideon’s personal commitment to her pledge on corporate money after those pledges have been popularized by big-name progressives, including Vermont Sen. Bernie Sanders.

“It shows the problem of how much influence corporations and big money has in our politics, even here in Maine,” she said.

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Gideon campaign says error led to campaign finance violation

[pressherald.com/2019/08/01/records-show-gideon-violated-federal-campaign-finance-law/](https://www.pressherald.com/2019/08/01/records-show-gideon-violated-federal-campaign-finance-law/)

By MARINA VILLENEUVE Associated Press

August 1, 2019

A spokeswoman for House Speaker Sara Gideon said Thursday that the candidate was given incorrect advice on reimbursements for political contributions she made in 2015 and 2016, which resulted in federal campaign finance violations.

Gideon is running to unseat Republican Sen. Susan Collins in 2020 and has made access to abortion rights and fighting corporate money in politics a focus of her campaign. Gideon quickly received the backing of the national Democratic Senatorial Campaign Committee in her bid to oust Collins, who has found her long-standing image as a moderate under fire in an increasingly polarized Washington.

The Democrat's campaign manager said Thursday that Gideon's fundraising committee received "incorrect guidance on how to process" such contributions.

"While these contributions were within the legal contribution limit and fully disclosed in public reporting, the fundraising committee was given incorrect guidance on how to process them," Amy Mesner said in an emailed statement. "As soon as we were made aware of the error, it was addressed."

Democratic congressional candidate Emily Cain reported a \$1,000 contribution from Gideon in 2015. Gideon's PAC soon after paid Gideon \$1,000 as "reimbursement for a federal contribution."

Gideon's campaign said that on Wednesday Gideon sent a personal check for \$3,250 to the U.S. Treasury to offset such contributions.

Gideon's campaign didn't respond to several follow-up questions, including who provided the incorrect guidance and why Gideon sent a check to the U.S. Treasury. The contributions from Gideon, whose leadership PAC was terminated in June, were first reported by The Washington Free Beacon, a conservative media outlet.



Collins' campaign didn't comment on the issue Thursday.

The chair of Maine's Republican Party, meanwhile, said it's "beyond ridiculous" that Gideon claimed she was unaware she was breaking campaign finance law.

"Anyone who runs for office knows that reimbursing yourself for federal election contributions through your corporate-funded PAC is not only illegal, but highly unethical," Maine Republican Party Chair Demi Kouzounas said.

Such federal law issues would be up to the Federal Election Commission, which declined to comment Thursday.

Meanwhile, a state ethics official said he wouldn't advise donors about the legality of federal contributions, but would instead advise them to report contributions "exactly as she did."

"There doesn't seem to be a violation of state campaign finance law," said Paul Lavin, assistant director of the Maine Ethics Commission.

Erin Chlopak, a former head of the Federal Election Commission's policy division who now works for the nonpartisan Campaign Legal Center, told the Bangor Daily News that it seemed like a "pretty clear-cut straw donor" situation. But she said it didn't look like an intentional violation because the filings disclosed the reimbursements.

"Typically, when people try to break the law, they try to be more discreet about it," Chlopak told the newspaper.

Gideon's PAC also reported a \$1,000 reimbursement to Gideon for "MDP contribution" in July 2016. It's unclear what "MDP" refers to. The Maine Democratic Party, which didn't provide comment, reported a \$500 contribution from Gideon Leadership PAC in August of 2016.

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