



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

To: Commissioners
From: Jonathan Wayne, Executive Director
Date: February 18, 2026
Re: Update on Request to Investigate Maine Democratic Party

Legal memo from counsel. Today, the Commission's counsel, Jonathan R. Bolton, provided a legal memo discussing whether Maine campaign finance law requires party committees who make substantial expenditures to influence a ballot question must form a ballot question committee. He recognizes the statutes are ambiguous. Ultimately, he concludes the best interpretation is that party committees are exempt from ballot question committee registration requirements and must instead report all ballot-question activity in their party reports pursuant to 21-A M.R.S. § 1017-A.

Status of investigation. The staff has received information from the Maine Democratic Party. The most important points are:

- The party received a total of \$250,000 for the purpose of opposing Question 1. The party received three contributions from the Democratic Governors Association totaling \$150,000, and a total of \$100,000 from three out-of-state individuals and one Maine business.
- The Maine Democratic Party states its total expenditures to oppose Question 1 were approximately \$176,500, which was mostly for staff. It made four expenditures to vendors for printing and media consulting totaling \$46,750.
- The party explains it did not file campaign finance reports 11 days before and 42 days after the November 4, 2025 election because the reports "did not appear as required (or optional) reports in the [Commission's eFiling] system. Filers often rely on the filing system itself to alert for additional reports, late filing and/or missing information on filing drafts. MDP assumed that if the report wasn't listed in the filing system, it was not required. It is possible that additional filings do not automatically

appear in the filing system without some back end intervention by commission staff (such as with special election reports) but MDP was not (and is not) aware that the additional filings for ballot question work only appear if turned on by staff.”

The party is correct that, last fall, the 11-day pre-election and 42-day post-election reports were not displayed as required reports for the Maine Democratic Party. Similar to a special election, the Commission staff assigns those reports to a party committee only if the party committee informs Commission staff that it is engaging in financial activity to influence the ballot question.

Options for the Commission: If the Commission accepts the application of law recommended by its counsel, Commission staff sees two options for the Commission. We would be fine with either approach:

- The Commission could accept that the Maine Democratic Party acted in good faith and intended to disclose its ballot question activities. The printed communications that were distributed to the public were clear that they were paid for the Maine Democratic Party. The transactions were disclosed to the public in the party’s campaign finance reports. Certain expenditures did not indicate they opposed Question 1 because, in part, the outside vendor hired by the Maine Democratic Party to conduct the bulk upload failed to recognize how that feature was designed. Rather than continuing this item to future meeting and incurring additional Commission time and legal expenses, the Commission could take a corrective approach of requesting that the party amend its reports as soon as the Commission’s new eFiling system will allow it.
- The Commission could request that the Commission staff report back at the March meeting with a recommendation on whether the Maine Democratic Party was required to file campaign finance reports 11 days before and 42 days after the November 4, 2025 election, and failed to identify those expenditures that opposed Question 1. The Maine Democratic Party would receive the recommendation significantly before the meeting in time to respond in writing.

Maine Democratic Party’s reliance argument. As the Commission will remember, the Maine Democratic Party responded to Mr. Titcomb’s complaint through letters dated December 19, 2025 and January 27, 2026 explaining why it did not register and file campaign finance reports as a ballot question committee. The party argues (1) it was not required to register and

report as a ballot question committee; and (2) it relied on a 9/26/2025 email exchange between counsel and Political Committee and Lobbyist Registrar Heidi Hoefler. ETH 18-20. I would like to offer a viewpoint on the reliance argument on behalf of Ms. Hoefler and myself:

- The context was that three days earlier, Ms. Hoefler had advised Gretta Wark of the Sagadahoc County Democratic Committee in writing that if her committee spent more than \$5,000 to advocate for a no vote on Question 1, it would need to register as a ballot question committee. Counsel for MDP had seen that written advice.
- After receiving Ms. Knox's email on 9/26/2026, Ms. Hoefler did not respond by saying "the Maine Democratic Party does not need to register as a ballot question committee" or "parties never need to register as ballot question committee." ETH 18-20. That would not be reasonable interpretations of Ms. Hoefler's email as a whole, particularly in the context of Ms. Hoefler's advice to the county committee three days earlier.
- Rather, Ms. Hoefler made a number of points concerning how the election law operates in the context of a local party committee making expenditures to oppose a ballot that may or may not exceed the \$5,000. That context should not be ignored when interpreting Ms. Hoefler's response.

My view is that the Maine Democratic Party and its counsel should be credited for taking a cooperative, constructive approach in *initiating* the 9/26/2025 conversation with a Commission staff member who was applying the law differently. In my opinion, the email exchange was a missed opportunity to have a full exchange of views by two busy professionals, which occasionally happens.

Attached materials:

- Legal memo by Assistant Attorney General Jonathan R. Bolton
- Relevant statutes
- Supplemental letter from counsel for the Maine Democratic Party dated 1/27/2026
- Materials distributed to the Commission by priority mail for its 1/28/2026 meeting



M E M O R A N D U M

TO: COMMISSIONERS, COMMISSION ON GOVERNMENTAL ETHICS
AND ELECTION PRACTICES (“COMMISSION”)

FROM: JONATHAN BOLTON, AAG

SUBJECT: LEGAL REQUIREMENTS FOR PARTY COMMITTEES ENGAGING
IN SPENDING TO INFLUENCE BALLOT QUESTIONS

DATE: FEBRUARY 18, 2026

CC: JONATHAN WAYNE, EXECUTIVE DIRECTOR

At the January 28, 2026 meeting you requested a memo discussing whether Maine’s campaign-finance laws (21-A M.R.S.A., ch. 13) require party committees who make substantial expenditures to influence ballot questions to form a ballot question committee (BQC). This request arose based on the Commission’s consideration of a complaint alleging that the Maine Democratic Party (MDP) received contributions and made expenditures opposing a referendum question on November 2025 ballot that exceeded the threshold for an entity to register as a ballot question committee.

After reviewing the relevant legal authorities and the parties’ submissions, I offer my thoughts and analysis below. This memo reflects my own legal analysis as counsel to the Commission. It is not an opinion of the Attorney General under 5 M.R.S.A. § 195.

I ultimately conclude that, while the relevant statutes are ambiguous and could be plausibly interpreted in different ways, the best interpretation is that party committees are exempt from BQC registration requirements and must instead report all ballot-question expenditures in their party reports.

BACKGROUND

On November 19, 2025, the Commission received a complaint from an officer of a BQC supporting one of the questions on the November 2025 ballot. The complaint alleges that the MDP received contributions and made expenditures to oppose Question 1 that exceeded the monetary thresholds for it to qualify under the statutory definition for a ballot question committee. MDP does not dispute that it

exceeded these monetary thresholds but contends that it satisfied its disclosure obligations by reporting these contributions and expenditures in its party reports.

This memo focuses exclusively on the legal question of whether MDP was required by law to register as a BQC in order to report its expenditures. I do not discuss the apparent factual dispute concerning whether and to what extent MDP relied on advice of commission staff.

LEGAL AUTHORITIES

In order to assist the Commission in reaching a decision in this matter, this section outlines the factors that should be considered in reaching the best interpretation of the statutory framework.

STATUTORY TEXT AND STRUCTURE

Party Committees

Maine's campaign-finance laws recognize three types of committees: BQCs, political action committees (PACs), and party committees. BQCs and PACs are addressed in their own subchapter of the campaign-finance laws, subchapter 4. Subchapter 4 contains definitions of "ballot question committee" and "political action committee" that effectively serve to spell out the requirements for when an entity needs to register with the Commission and file campaign-finance reports. 21-A M.R.S.A. § 1052(2-A) & (5). Party committees, on the other hand, are not expressly defined or regulated in subchapter 4. Rather, they are regulated in subchapter 2, the same subchapter that regulates candidates.¹

Party committees are required to file reports under 21-A M.R.S.A. § 1017-A. That statute contains one filing schedule for state party committees and a different, less onerous filing schedule for municipal, district and county party committees. *See* 21-A M.R.S.A. § 1017-A(4-A) & (4-B). All types of committees must include the same categories of information in their filings, including the "purpose" of each expenditure. *Id.* § 1017-A(1)–(3).

The language of § 1017-A has two notable aspects for present purposes:

First, even though parties exist to elect candidates, their reporting obligation clearly encompasses spending to influence referenda elections as well as candidate elections. The statutory text requires reporting of expenditures to influence a "campaign, as defined in section 1052, subsection 1." That cross-referenced definition expressly covers a course of activities to influence referenda elections. *See*

¹ Title 21-A does not define "party committee," but defines "party" as "a political organization which has qualified to participate in a primary or general election under chapter 5." 21-A M.R.S.A. § 1(28). Parties must form state and local committees to carry out their formal functions under election law. *See, e.g.*, 21-A M.R.S.A. §§ 311 (municipal party committees); 322 (state, congressional district, and county party committees).

21-A M.R.S.A. § 1052(1). In addition, §1017-A(4-A)(C) sets forth a schedule for parties to file reports in years without a general election where they have made contributions or expenditures “for the purpose of influencing a ballot question election,” among other things.

Second, the statute repeatedly uses the term “all” to describe what must be reported. The party must report “*all* contributions.” And it must report “*all* expenditures made to influence a campaign.” *Id.* § 1017-A(1) & (2).

Ballot Question Committees

The law defines *ballot question committee* as

a person that receives contributions or makes expenditures aggregating in excess of \$5,000 for the purpose of initiating or influencing a campaign, other than a campaign for the nomination or election of a candidate. The term “ballot question committee” does not include a political action committee or an exempt donor.

21-A M.R.S.A. § 1052(2-A). *Person* is a statutorily defined term:

“Person” means an individual, committee, firm, partnership, corporation, association or organization.

21-A M.R.S.A. § 1001(3). This definition applies to all uses of *person* in Maine’s campaign-finance laws (i.e. Title 21-A, chapter 13) “unless the context otherwise indicates.” *Id.* § 1001.

There appears to be no viable argument that a party committee is outside the statutory definition of *person* as a general matter. A party committee, quite simply, is a type of “committee.”² If party committees are not “persons” within the meaning of the BQC statute, it would have to be because “the context otherwise indicates.”

Also notable about this definition is that it ends with a list of exceptions, which notably does not include party committees, though it does include PACs—another type of committee.

Differences in Reporting Requirements.

The requirements for BQC and party committee reports are similar but not identical, with BQCs subject to slightly more rigorous requirements. BQCs and state party committees must file quarterly reports as well as reports on the 11th day before any election and the 42nd day after the election. *See* 21-A M.R.S.A.

² Although there is a definition of “committee” in 21 A M.R.S.A. § 1052(2) that limits that term to PACs and BQCs, that definition only applies to terms used in subchapter 4, thus does not apply to the use of “committee” in the definition of “person,” which appears in subchapter 1.

§§ 1017-A(4-A); 1059(2). Municipal, district, and county party committees are subject to a more lenient reporting schedule than BQCs, with only semiannual reports required, as well as a report 11 days before a general election (but not a primary election). *See* 21-A M.R.S.A. § 1017-A(4-B).

BQCs are subject to a lower threshold for reporting contributions: they must report all individual contributions of more than \$50, while party committees may report contributions of \$200 or less as a lump sum.

BQCs and party committees are subject to different definitions of “contribution” and “expenditure,” with the definitions applicable to party committees (and candidates) containing more exceptions. *Compare* 21-A M.R.S.A. § 1012(2) & (3) *with* 21-A M.R.S.A. § 1052(3) & (4).

BQCs must file registration paperwork with the Commission that provides several categories of information, including a statement of purpose that apprises the public of which ballot question it intends to support or oppose. *See* 21-A M.R.S.A. § 1052-A(3). Party committees are subject to more modest registration requirements and are not required to disclose in that paperwork whether they are in support or opposition to specific ballot questions. *See id.* § 1013-A(3).

Finally, the BQC statute is somewhat more prescriptive in what information must be reported for each expenditure. While the party committee statute requires reporting the “date, amount, and purpose of each expenditure,” the BQC statute requires, among other things, “the date, payee and purpose of the expenditure and the name of each . . . referendum or initiated petition supported or opposed by the expenditure.” *Compare* 21-A M.R.S.A. § 1017-A(2)(C) *with* 21-A M.R.S.A. § 1060(4).

LEGISLATIVE HISTORY

I was unable to find much in the legislative history of the relevant provisions that illuminated legislative intent. The Legislature amended § 1017-A to require party committees to report referendum spending in 2003, in a bill entitled “An Act To Standardize Reporting Requirements for State Party Committees’ Expenditures and Contributions.” *See* P.L. 2003, ch. 302 (legislative history materials available at <https://ldc.mainelegislature.org/Open/Menu/LegHist/121/lh121-LD-0659.pdf>). At the time of this change, there was already a separate requirement in statute that “[a]ny person not defined as a political committee who solicits and receives contributions or makes expenditures, other than by contribution to a political action committee, aggregating in excess of \$1,500 for the purpose of initiating, promoting, defeating or influencing in any way a ballot question must file a report with the commission.” P.L. 1999, ch. 729, § 8 (codified as amended at 21-A M.R.S.A. § 1056-B until later repealed).

The proponents of this bill were clearly more concerned with altering the schedule of party-committee reports than they were with enhancing the information that must be included in those reports. Indeed, I can find no mention in the legislative history of the latter change. So it is difficult to draw much insight from this history. Perhaps the lack of commentary on the change indicates that parties

understood themselves to be required to report referenda expenditures in their party-committee reports even before it was made explicit in statute. But that is speculation on my part.

CASELAW

I did not find any relevant caselaw on the question presented here. According to Westlaw, 21-A M.R.S.A. § 1017-A has never been cited in a reported decision.

POSSIBLE INTERPRETATIONS

In my view, there are three interpretations of the statutory framework that are at least conceivable given the considerations above:

Interpretation #1: Party committees that reach the \$5,000 spending threshold to qualify as a BQC must file two sets of reports, one under the BQC statute and one under the party committee statute, both of which include their ballot question spending.

Interpretation #2: Party committees that reach the \$5,000 spending threshold are required to stop making expenditures under their own name and must form a BQC to continue spending; the party would then report any further spending as contributions to the BQC under § 1017-A, and the BQC would report the expenditures it made using those contributions in its BQC reports under §§ 1059–1060.

Interpretation #3: Party committees are exempt from BQC reporting requirements because they are not “persons” as that term is used in the specific context of the BQC statute and thus need only file reports under § 1017-A

ANALYSIS AND RECOMMENDATION

My recommendation is that the Commission conclude that party committees are subject only to the reporting requirements of § 1017-A and are not required to either register as a BQC or form a separate BQC if they spend over the \$5,000 threshold. My reasoning follows.

The goal of statutory interpretation is to give effect to the Legislature’s intent. *See State v. Santerre*, 2023 ME 63, ¶ 8, 301 A.3d 1244. And while that analysis requires considering the “plain meaning” of the statutory language, that consideration must occur “in the context of the whole statutory scheme.” *Id.*; *see also Mallinckrodt US LLC v. Dep’t of Env’t Prot.*, 2014 ME 52, ¶ 21, 90 A.3d 428 (court must construe the “whole statutory scheme of which the section at issue forms a part so that a harmonious result, presumably the intent of the Legislature, may be achieved”). “[A]bsurd, illogical, or inconsistent results” should be avoided. *Santerre*, 2023 ME 63, ¶ 9, 301 A.3d 1244. It is also appropriate to consider the “subject matter, design, and structure of the statute, as well as the consequences of specific interpretations.” *Id.*

Here, the Commission is faced with a definition of “ballot question committee” that is seemingly sweeping, covering all “persons,” broadly defined, who meet the financial thresholds, subject only to two enumerated (and inapplicable) exceptions. Yet the Commission is simultaneously faced with a larger statutory scheme that elsewhere sets forth a comprehensive framework for party committees to report to the public on their activities. *See* 21-A M.R.S.A. § 1017-A. That framework by its plain terms already requires that party committees report their expenditures to influence referenda, with some relatively minor differences from the BQC statute in scope and procedure. *Id.*

Moreover, that separate framework set forth in § 1017-A uses exhaustive terminology to describe the reports that are required, expressly requiring the committee to report “all” of its contributions and “all” of its expenditures. *Id.* Courts have recognized that the “the use of the word ‘all’ as a modifier suggests an expansive meaning because ‘all’ is a term of great breadth.” *Project Vote/Voting for Am., Inc. v. Long*, 682 F.3d 331, 336 (4th Cir. 2012) (cleaned up).

Given that the Legislature has created a comprehensive scheme for party-committee reporting, it seems unlikely that the Legislature meant for party committees who spend over \$5,000 to influence a ballot question to file a second set of reports that require disclosure of largely the same information on largely the same timetable. While the Legislature’s use of the defined term “person” to describe who must register as a BQC indicates that it generally meant for “committees” to be included in those who must register, it not clear that the Legislature intended to encompass a very specific type of committee that it elsewhere already subjected to a very similar disclosure regime.

Indeed, to read the statute to require dual reporting raises the specter of, if not “absurd” results, then at least the sort of “illogical, or inconsistent results” that statutory interpretation should strive to avoid. *Santerre*, 2023 ME 63, ¶ 9, 301 A.3d 1244. In short, for the statutory framework to work as a “harmonious” whole, the BQC statute should be interpreted as implicitly exempting party committees. *See Mallinckrodt*, 2014 ME 52, ¶ 21, 90 A.3d 428.

It may be objected that this interpretation gives too much weight to structural and policy concerns and not enough weight to plain words of the BQC statute. After all, the BQC statute uses a defined term, “person,” that expressly encompasses a “committee” in its statutory definition. And while “committee” is itself undefined, any reasonable interpretation of that term would encompass a party committee. *See Searle v. Town of Bucksport*, 2010 ME 89, ¶ 8, 3 A.3d 390 (undefined statutory terms should be given their “plain and natural meaning and should be construed according to their natural import in common and approved usage”).

But the statute containing the definition of *person* itself provides that these definitions should not be mechanically applied, stating that its definitions govern within Chapter 13 “unless the context otherwise indicates.” 21-A M.R.S.A. § 1001. In this case, the fact that the Legislature has separately subjected this particular type of committee to an analogous and comprehensive regulatory scheme is, in my

view, sufficient “context” to read *person*, as used in the BQC statute, to exclude party committees.

A second objection is that the Legislature did include two other express exceptions in the BQC statute—for exempt donors and PACs—and yet did not list party committees as a third exception. Making matters worse, the Legislature *did* think to exempt party committees from the definition of PAC. See 21-A M.R.S.A. § 1052(5)(B)(3). This objection is, in my view, the strongest argument against an interpretation of “person” in the BQC statute as excluding party committees: the Legislature clearly knew how to make exceptions, including exceptions for party committees, and yet apparently did not see fit to include party committees among those exceptions.

The answer to this objection is that party committees exist to elect candidates and, as a result, can be expected to only rarely delve into influencing ballot questions. Thus, it would have been easy for the Legislature to overlook the need for an express exception in the BQC statute for party committees. The caveat in the definition of “person” for when “context otherwise indicates” is a concession that there will inevitably be circumstances in a complex regulatory framework in which defined terms may need to be given a more nuanced meaning to best effectuate overall legislative intent.

A final objection to this approach may be that the MDP’s actual disclosures on their party reports were not sufficiently specific to apprise the public of the extent of their involvement in opposing Question 1. This deficiency can plausibly be blamed on the less prescriptive language in the party-committee statute, which requires identification of *candidates* supported by expenditures, but does not specifically require identification of ballot questions supported or opposed. 21-A M.R.S.A. § 1017-A(2). Had MDP formed a BQC, in contrast, the BQC would have been under a clear obligation to specify the “name of . . . each referendum or initiated petition supported or opposed by the expenditure.” 21-A M.R.S.A. § 1060.

But § 1017-A(2), though considerably more terse than the BQC statutes in its reporting requirements, does require the party committee to state the “purpose” of the expenditure. See 21-A M.R.S.A. § 1017-A(2)(C). In the case of an expenditure to influence a ballot question campaign, the “purpose” requirement can reasonably be interpreted to require, among other information, identification of which ballot question is being supported or opposed. Although I offer no view on the technical capacities of the Commission’s then-current filing system to accept such detail in bulk form, the lack of such detail in MDP’s reports is concerning. My presumption for purposes of this memo—which is crucial to my interpretation—is that, were this issue to come up in the future under an unchanged statutory framework, the Commission could and would expect future party committee reports containing ballot-question expenditures to be more specific about their “purpose” than were the submissions at issue here. Otherwise, the disclosure regime for party committees and BQCs could not be fairly understood as substantially similar.

The above analysis makes Interpretation #1 above—in which party committee would have to file duplicative reports as a party committee and as a BQC

the least plausible interpretation. However, Interpretation #2—in which the party committee directly reports ballot-question expenditures up to \$5,000 but must form and contribute to a BQC if exceeds the \$5,000 threshold—avoids the worst aspects of the dual-reporting problem inherent in Interpretation #1. But while a considerable improvement over Interpretation #1, Interpretation #2 is, in my view, still less convincing than Interpretation #3, in which the BQC statute is deemed wholly inapplicable to party committees.

Under Interpretation #2, the party committee would be required to register a new entity with a new name that would effectively serve as an alter-ego for the party for a particular ballot question campaign. Although the practical reality would likely be that the same party officials would continue to make all spending decisions, those transactions would now be reported to the public in a more convoluted way. Specifically, rather than the party committee disclosing its expenditures under its own name, the party committee would report a series of “contributions” to its alter-ego BQC, and that BQC would then report how those contributions were spent. The BQC would be free to adopt a generic name that would not make apparent its link to the party. One implication of this approach is that the on-ad disclaimers required by 21-A M.R.S.A. § 1055-A for advertisements to influence ballot questions would disclose only the name of the BQC, and not the party committee that is the de facto spender.³

Thus, while this interpretation has the virtue of giving “person” in the BQC statute its normal statutory definition, and also solves the double-reporting problem, it results in regulatory framework that will seemingly provide less transparency to the public than would an interpretation that allows party committees to make expenditures directly, without forming a BQC, and then requires it to report those expenditures as originating from the party committee. The former result would seem to undermine the overarching legislative purpose behind campaign-finance reporting—to provide transparency to voters about who is actually spending money to influence elections.

Interpretation #2 also seems at least in tension with the imperative in § 1017-A requiring party committees to report “all” expenditures to influence a campaign, including a referendum campaign. Under canons of statutory interpretation, this term should be given independent meaning. *See Project Vote*, 682 F.3d at 336; *Waterman v. Wheeler*, 2025 ME 96, ¶ 4, 347 A.3d 1028 (“All words in a statute are to be given meaning, and no words are to be treated as surplusage if they can be reasonably construed.”). Under Interpretation #2, parties would only be required to report expenditures to influence a ballot question campaign if they remained below \$5,000. After that, they would continue to make such expenditures in practice, but would report them via a different entity.

³ Of course, parties would be free to form such BQCs even if the law did not require them to do so. But there is a difference between the law allowing such an approach and the law compelling such an approach.

In short, while Interpretation #2 is a plausible reading of the statutory framework that should be seriously considered, I am ultimately not persuaded that it best effectuates the overall statutory framework, which appears to contemplate that party committees directly report *all* of their expenditures to influence ballot questions to the public.

I look forward to answering any questions you may have when we meet next week.

J.R.B.

**Applicable Law re: Registration of and Reporting by Ballot Question Committees
(Alex Titcomb complaint re: Maine Democratic State Committee)**

Title 21-A

§1001. Definitions

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

3. Person. "Person" means an individual, committee, firm, partnership, corporation, association or organization.

§1003. Investigations by commission

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.

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

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

2. Expenditures to influence a campaign. A party committee shall report all expenditures made to influence a campaign, as defined in [section 1052, subsection 1](#). The party committee shall report:

- A. The name of each candidate, political action committee, ballot question committee or party committee;
- B. The office sought by a candidate and the district that the candidate seeks to represent; and
- C. The date, amount and purpose of each expenditure

3. Other expenditures. Operational expenses and other expenditures that are not made to influence a campaign, as defined in [section 1052, subsection 1](#) must be reported separately. The party committee shall report:

- A. The name and address of each payee;
- B. The purpose for the expenditure; and
- C. The date and amount of each expenditure.

4. Filing schedule.

4-A. Filing schedule. A state party committee shall file its reports according to the following schedule. All reports required under [paragraphs A, B and C](#) must be filed by 11:59 p.m. on the day of the filing deadline.

A. A state party committee shall file quarterly reports:

- (1) On January 15th, which must be complete up to December 31st;
- (2) On April 10th, which must be complete up to March 31st;
- (3) On July 15th, which must be complete up to June 30th; and
- (4) On October 5th, which must be complete up to September 30th.

B. During any year in which primary and general elections are held, a state party committee shall file primary and general election reports in addition to the reports required under [paragraph A](#):

- (1) On the 11th day before the date on which the election is held, which must be complete up to the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held, which must be complete up to the 35th day after that date.

C. In an election year other than a year described in [paragraph B](#), if a state party committee has received contributions or made expenditures for the purpose of influencing a ballot question election, a special election or a municipal candidate or referendum election subject to [Title 30-A, section 2502](#), the committee shall file preelection and post-election reports:

- (1) On the 11th day before the date on which the election is held, which must be complete up to the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held, which must be complete up to the 35th day after that date.

D. A state party committee that files an election report under [paragraph B](#) or [C](#) is not required to file a quarterly report under [paragraph A](#) when the deadline for that quarterly report falls within 10 days of the filing deadline established in [paragraph B](#) or [C](#).

E. If a state party committee is required to file a report 11 days before an election pursuant to [paragraph B](#) or [C](#), the committee shall report any single contribution of \$5,000 or more received or any single expenditure of \$1,000 or more made after the 14th day before the election and more than 24 hours before 5:00 p.m. on the day of the election within 24 hours of that contribution or expenditure. The committee is not required to include in this report expenditures for overhead expenses or compensation paid to an employee or other member of the campaign staff who has received payments at regular intervals that have been disclosed in previously filed campaign finance reports. As used in this paragraph, "overhead expenses" includes, but is not limited to, rent, utility payments, taxes, insurance premiums or similar administrative expenses.

4-B. Filing schedule for municipal, district and county party committees. Municipal, district and county party committees shall file reports according to the following schedule.

A. Reports filed during an election year must be filed with the commission by 11:59 p.m. on:

- (1) July 15th and be complete as of June 30th;
- (2) The 11th day before the date on which the general election is held and must be complete up to the 14th day before that date; and
- (3) January 15th and be complete as of December 31st.

B. Reports filed during a nonelection year must be filed by 11:59 p.m. on:

- (1) July 15th and be complete as of June 30th; and
- (2) January 15th and be complete as of December 31st.

C. A committee shall report any single contribution of \$5,000 or more received or any expenditure of \$1,000 or more made after the 14th day before a general or special election and more than 24 hours before 11:59 p.m. on the day of the election within 24 hours of that contribution or expenditure. The committee is not required to include in this report expenditures for overhead expenses or compensation paid to an employee or other member of the campaign staff who has received payments at regular intervals that have been disclosed in previously filed campaign finance reports. As used in this paragraph, "overhead expenses" includes, but is not limited to, rent, utility payments, taxes, insurance premiums or similar administrative expenses.

4-C. Electronic filing. State party committees shall file each report required by this section through an electronic filing system developed by the commission. The commission may make an exception to this electronic filing requirement if a party committee submits a written request that states that the party committee lacks access to the technology or the technological ability to file reports electronically. The request for an exception must be submitted by March 1st of the election year. The commission shall grant all reasonable requests for exceptions.

5. Penalties. A party committee is subject to the penalties in [section 1020-A, subsection 4-A](#).

6. Notice; forms. A state party committee shall notify all county, district and municipal party committees of the same political party of the party committee reporting requirements. The party committees shall obtain the necessary forms from the commission to complete the filing requirements.

7. Exemption. Any party committee receiving and expending less than \$1,500 in one calendar year is exempt from the reporting requirements of this section for that year.

8. Municipal elections. When a party committee makes contributions or expenditures on behalf of a candidate for municipal office subject to this subchapter, it shall file a copy of the reports required by this section with the clerk in that candidate's municipality.

§1052. Definitions

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

1. Campaign. "Campaign" means any course of activities to influence the nomination or election of a candidate or to initiate or influence any of the following ballot measures:

A. A people's veto referendum under the Constitution of Maine, Article IV, Part Third, Section 17;

B. A direct initiative of legislation under the Constitution of Maine, Article IV, Part Third, Section 18;

C. An amendment to the Constitution of Maine under Article X, Section 4;

D. A referendum vote on a measure enacted by the Legislature and expressly conditioned upon ratification by a referendum vote under the Constitution of Maine, Article IV, Part Third, Section 19;

E. The ratification of the issue of bonds by the State or any agency thereof; and

F. Any county or municipal referendum.

2. Committee. "Committee" means any political action committee or ballot question committee and includes any agent of a political action committee or ballot question committee.

2-A. Ballot question committee. "Ballot question committee" means a person that receives contributions or makes expenditures aggregating in excess of \$5,000 for the purpose of initiating or influencing a campaign, other than a campaign for the nomination or election of a candidate. The term "ballot question committee" does not include a political action committee or an exempt donor.

3. Contribution. "Contribution" includes:

A. A gift, subscription, loan, advance or deposit of money or anything of value made to or received by a committee for the purpose of initiating or influencing a campaign, including but not limited to:

(1) Funds that the contributor specified were given, in whole or in part, in connection with a campaign;

(2) Funds provided in response to a solicitation that would lead the contributor to believe that the funds would be used specifically, in whole or in part, for the purpose of initiating or influencing a campaign; and

(3) Funds that can reasonably be determined to have been provided by the contributor for the purpose of initiating or influencing a campaign when viewed in the context of the contribution and the recipient committee's activities regarding a campaign;

A-1. Any funds deposited or transferred into the campaign account described in section 1054;

C. Any funds received by a committee that are to be transferred to any candidate, committee, campaign or organization for the purpose of initiating or influencing a campaign; or

D. The payment, by any person or organization, of compensation for the personal services of other persons provided to a committee that is used by the committee to initiate or influence a campaign.

"Contribution" does not include a loan of money by a financial institution made in accordance with applicable banking laws and regulations and in the ordinary course of business.

4. Expenditure. The term "expenditure":

A. Includes:

(1) A purchase, payment, distribution, loan, advance, deposit or gift of money or anything of value, made for the purpose of initiating or influencing a campaign;

(1-A) Any purchase, payment, distribution, loan, advance, deposit or gift of money made from the campaign account described in section 1054;

(2) A contract, promise or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure for the purposes set forth in this paragraph; and

(3) The transfer of funds by a political action committee to another candidate or political committee; and

B. Does not include:

(1) Any news story, commentary or editorial distributed through the facilities of any broadcasting station, cable television system, newspaper, magazine or other periodical publication, unless these facilities are owned or controlled by any political party, political committee, candidate or the spouse or domestic partner of a candidate;

(2) Activity designed to encourage individuals to register to vote or to vote, if that activity or communication does not mention a clearly identified candidate;

(3) Any communication by any membership organization or corporation to its members or stockholders, if that membership organization or corporation is not organized primarily for the purpose of influencing the nomination or election of any person to state or county office;

(4) The use of real or personal property and the cost of invitations, food and beverages, voluntarily provided by a political action committee in rendering voluntary personal services for candidate-related activities, if the cumulative value of these activities by the political action committee on behalf of any candidate does not exceed \$250 with respect to any election;

(5) Any unreimbursed travel expenses incurred and paid for by a political action committee that volunteers personal services to a candidate, if the cumulative amount of these expenses does not exceed \$100 with respect to any election;

(6) Any communication by a committee that is not made for the purpose of influencing the nomination or election of any person to state or county office; and

(7) Any payments to initiate a people's veto referendum or the direct initiative of legislation made prior to the submission of an application to the Department of the Secretary of State as provided in section 901.

4-A. Influence. "Influence" means to promote, support, oppose or defeat.

4-B. Initiate. "Initiate" includes the collection of signatures on petitions and related activities to qualify a state or local initiative or referendum for the ballot.

§1052-A. Registration

A committee shall register with the commission and amend its registration as required by this section. A registration is not timely filed unless it contains all the information required in this section.

1. Deadlines to file and amend registrations. A committee shall register and file amendments with the commission according to the following schedule.

A. A political action committee as defined under section 1052, subsection 5, paragraph A, subparagraph (1) or (5) shall register with the commission within 7 days of receiving contributions or making expenditures in the aggregate in excess of \$2,500.

A-1. A ballot question committee shall register with the commission within 7 days of receiving contributions or making expenditures in the aggregate in excess of \$5,000.

§1059. Report; filing requirements

A committee required to register under section 1052-A or 1053-B shall file an initial campaign finance report within 7 days of registration or within 14 days of having been required to register, whichever comes first, and thereafter shall file reports in compliance with this section. All reports must be filed by 11:59 p.m. on the day of the filing deadline, except that reports submitted to a municipal clerk must be filed by the close of business on the day of the filing deadline.

1. Contents; quarterly reports and election year reports. [PL 2007, c. 443, Pt. A, §35 (RP).]

2. Reporting schedule. A committee shall file reports according to the following schedule.

A. A committee shall file quarterly reports:

(1) On January 15th, and the report must be complete as of December 31st;

(2) On April 10th, and the report must be complete as of March 31st;

- (3) On July 15th, and the report must be complete as of June 30th; and
- (4) On October 5th, and the report must be complete as of September 30th.

B. During any year in which primary and general elections are held, a committee shall file primary and general election reports in addition to the reports required under paragraph A:

- (1) On the 11th day before the date on which the election is held, which must be complete as of the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held, which must be complete as of the 35th day after that date.

A committee shall file primary and general election reports even if the committee did not engage in financial activity to influence the primary or general election.

C. In any election year other than a year described in paragraph B, if a committee has received contributions or made expenditures for the purpose of influencing a ballot question election, a special election or a municipal candidate or referendum election subject to Title 30-A, section 2502, the committee shall file preelection and post-election reports:

- (1) On the 11th day before the date on which the election is held, which must be complete as of the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held, which must be complete as of the 35th day after that date.

D. A committee that files an election report under paragraph B or C is not required to file a quarterly report when the deadline for that quarterly report falls within 10 days of the filing deadline established in paragraph B or C.

E. If a committee is required to file a report 11 days before an election pursuant to paragraph B or C, the committee shall report any single contribution of \$5,000 or more received or single expenditure of \$1,000 or more made after the 14th day before the election and more than 24 hours before 5:00 p.m. on the day of the election within 24 hours of that contribution or expenditure. The treasurer is not required to include in this report expenditures for overhead expenses or compensation paid to an employee or other member of the campaign staff who has received payments at regular intervals that have been disclosed in previously filed campaign finance reports. As used in this paragraph, "overhead expenses" includes, but is not limited to, rent, utility payments, taxes, insurance premiums or similar administrative expenses.

§1060. Content of reports

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

- 1. Identification of candidates.** The names of and offices sought by all candidates whose campaigns the committee supports or intends to influence;
- 2. Identification of committees; parties.** The names of all political committees or party committees supported in any way by the committee;
- 3. Identification of ballot question campaigns.** The ballot question campaigns that the committee intends to initiate or influence;
- 4. Itemized expenditures.** An itemization of each expenditure made to initiate or influence any campaign, including the date, payee and purpose of the expenditure and the name of each candidate, and each referendum or initiated petition supported or opposed by the expenditure. If expenditures were made to a person described in [section 1012, subsection 3, paragraph A, subparagraph \(4\)](#), the report must contain the name of the person; the amount spent by that person on behalf of the committee, including, but not limited to, expenditures made during the signature gathering phase; the reason for the expenditure; and the date of the expenditure. The commission may specify the categories of expenditures that are to be reported to enable the commission to closely monitor the activities of committees;
- 5. Aggregate expenditures.**
- 6. Identification of contributions.** An itemization of each contribution of more than \$50 made to or received by the committee for the purpose of initiating or influencing a campaign, including the name, occupation, places of business and mailing address of each contributor and the amount and date of the contribution;
- 6-A. Funds deposited into campaign account.** Any funds deposited into or transferred into the campaign account described in [section 1054](#), including but not limited to funds from the general treasury of an organization that is required to establish a committee; and
- 7. Other payments.** Operational expenses and any other payments made from the campaign account described in [section 1054](#).

Memorandum

To: Jonathan Wayne

From: Kate Knox and Lisa Prosienski

Date: January 27, 2026

RE: **Maine Democratic Party/Ballot Questions – Supplemental Information**

Dear Mr. Wayne,

Prior to the Commission’s consideration of this matter on Wednesday, we felt it important to respond to Mr. Titcomb’s second filing and the staff memorandum – albeit briefly.

We strenuously object to the staff’s recommendation that an investigation be conducted into whether the Maine Democratic Party (“MDP”) should have registered and reported as a Ballot Question Committee (“BQC”). Our objections rest on two primary points:

- 1. Whether or not MDP should register as a BQC is a question of statutory interpretation, which is determined by examining the plain language of the statute, not the facts of a particular situation.***

The question of whether MDP should register as a BQC does not turn on MDP’s activities during the campaign, it turns on the Commission’s interpretation of the statutory definitions at issue. Courts have long held that statutory interpretation begins with the plain language of the statute, in context of the statute, to determine the meaning while avoiding absurd, illogical or inconsistent results. *Fair Elections Portland, Inc. v. City of Portland*, 2021 ME 32 § 22, 252 A.3rd 504.¹ While the statute states an investigation is appropriate if “the reasons state for the

¹ “We look first to the plain language of [a] statute to determine its meaning if we can do so while avoiding absurd, illogical, or inconsistent results.” *State v. Conroy*, 2020 ME 22, ¶ 19, 225 A.3d 1011. As part of the plain-language analysis, “we consider the [specific] language in the context of the whole statutory scheme,” *Chadwick-BaRoss, Inc. v. City of Westbrook*, 2016 ME 62, ¶ 11, 137 A.3d 1020

request show sufficient grounds for believing that a violation may have occurred,” it is also logical to assume that there must be information to be discovered which would be relevant to the determination. 21-A M.R.S. § 1003(2). In this case, the issue of whether a “violation may have occurred” has nothing to do with the specific activities of MDP, but rather whether the Commission supports the statutory interpretation laid out by MDP or by Mr. Titcomb. The Commission is in possession of all the facts it needs to make a determination.

As a reminder, we believe that MDP’s interpretation of the statute was reasonable based on the plain language of the statute and the related legislative history. In sum:

- Party Committees are unique entities who are treated differently than PACs and BQCs (i.e. different reporting deadlines, exceptions to contribution and expenditure rules, etc).
- Party Committee reporting requires disclosure and reporting of “all expenditures to influence a campaign” which includes any course of activities to influence a candidate or ballot question. That expectation is supported by Commission staff’s statement that there is a drop-down box in party filings which allow filers to choose if the expenditure was made in support or opposition to a ballot question.² There is simply no question that ballot question expenses are required on party reports.
- Because the statute requires MDP to report all its ballot question expenditures on its party committee reports, it is reasonable and logical to conclude it did not have to double report by forming a parallel entity to report the same expenditures. Determining otherwise would lead to “absurd, illogical and inconsistent results” *Id.*
- Legislative history also indicates that the intention of 21-A M.R.S. §1017-A is to explicitly state that MDP must disclose all expenditures for ballot questions. In 2019, that definition was amended to add “ballot question committee” to clarify that a party committee must report expenditures made in support of a ballot question. When testifying in support of the change, written testimony highlighted that “Party Committees are required to disclose all expenditures made to influence ‘a campaign’ (a candidate or ballot question election), including contributions to a candidate, another party committee or a PAC.” (*see attached testimony on LD 1721, pages 4 and 10*). Further, testimony stated “[t]he Commission proposes inserting the term “ballot question committees” and “[t]he term ‘ballot question committee’ should be added for completeness. It appears that the intention was to clarify that a party is required to disclose expenditures in support of a ballot question and to a ballot question committee, as the statute now currently reads.

(alteration omitted) (quotation marks omitted), and “examine the entirety of the statute, giving due weight to design, structure, and purpose as well as to aggregate language,” *Dickau v. Vt. Mut. Ins. Co.*, 2014 ME 158, ¶ 22, 107 A.3d 621 (quotation marks omitted). *Id.*

² That drop down menu does not appear if a filer is bulk uploading their data, which is how MDP files its reports.

- Finally, Maine election law does not require double reporting (two separate entities reporting the exact same information) in any other situation as it's confusing to the public and overly burdensome on filing organizations.
2. ***MDP reasonably relied on staff guidance, which while not binding on the Commission, should weigh heavily in favor of MDP.***
- In late September, MDP (through its attorneys) reached out to Commission staff to express concern about reporting advice given to the Sagadahoc County Democratic Committee (a registered county committee) regarding its potential involvement in Question 1. The advice given to SDCC was confusing and MDP responded with a lengthy email outlining its concerns and being very clear that *“as of right now, party committees are doing work to influence Question 1 and are reporting it on their regular party committee reports. If you continue to believe a BQC is required, it would be great to meet and talk about why.”* ETH 19 and 20.
 - Staff responded by saying *“... I did not see a question for me.”* ETH 18
 - Staff goes on to state *“...although a group is not required to register...you may want to consider registering” I agree that the applicable statute does not require a party committee to separately establish a BQC for ballot question work.”*
 - Staff then goes on to make a confusing statement stating the definition of a ballot question committee. When trying to assess the meaning of the email, MDP logically relied on the clear and direct statement from staff which said that MDP was not required to establish a BQC.
 - MDP was always clear about its activities and asked staff to verify its reading of the statute. Despite a confusing exchange, it was appropriate for MDP to rely on the clear statement that *“...the applicable statute does not require a party committee to separately establish a BQC for ballot question work.”*
 - While staff interpretations are not binding on the Commission, they are an indication of good faith on the part of MDP and combined with a logical reading of the statute – support not moving forward with an investigation related to BQC formation.

Thank you for the opportunity to provide additional information.



STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS
AND ELECTION PRACTICES
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**Testimony of Jonathan Wayne, Executive Director of the
Commission on Governmental Ethics and Election Practices
before the Joint Standing Committee on Veterans and Legal Affairs
May 15, 2019**

Senator Luchini, Representative Schneck, and distinguished members of the committee: my name is Jonathan Wayne, and I am the Executive Director of the Maine Commission on Governmental Ethics and Election Practices. Thank you for the opportunity to testify in support of L.D. 1721.

L.D. 1721 is the Commission's "agency" bill, which is intended to address some issues that have come up in the last few years. This written testimony highlights three issues in the bill for the public hearing. A two-column summary is attached (four pages), along with a longer section-by-section explanation of the bill.

Authority to investigate complaints concerning residency of Maine Clean Election Act candidates. (Sec. 30-31) The Commission seeks authorization to investigate complaints that a Maine Clean Election Act (MCEA) candidate for the Legislature is not a resident of the district which the candidate is seeking to represent.

Payments of MCEA funds to a candidate's spouse or domestic partner, or a related business. (Sec. 32) The Commission proposes that MCEA candidates could not use MCEA funds to purchase campaign goods or services from the candidate's spouse or domestic partner, or a business owned by the candidate or the candidate's spouse or domestic partner. Under current law, these payments are allowed if the goods or services are for a legitimate campaign-related purpose; the

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payee regularly provides the goods or services in the normal course of their occupation or business; and the cost is reasonable. The Commission is concerned that payments to the candidate's spouse or domestic partner, or businesses owned by them, could appear to be self-serving, even if the goods or services are legitimate and reasonably priced.

Alternative procedure for collection of qualifying contributions in cash. (Sec. 28) The Commission proposes an alternative procedure for candidates seeking MCEA certification to document that they received a \$5 qualifying contribution in cash. The Commission's proposal, which is based on a 2017 bill by Sen. David Miramant in the 128th Legislature (LD 585), is that the candidate could use the cash collected from multiple contributors to purchase *a single money order* or cashier's check for the amount collected to be submitted to the Commission.

Thank you for your consideration of this bill.

Short Summary of LD 1721 – Ethics Commission Agency Bill

	Proposed Change in Law	Rationale for Proposal
1	Under current law, Commissioners may serve two terms. Each term has a maximum length of three years, suggesting an intention for Commissioners to be able to serve for six years. In practice, however, the first term of some Commissioners can be much shorter when they are filling a vacancy (sometimes just a few months). The Commission proposes that if a Commissioner's first term is less than two years, that period would <i>not</i> count as the Commissioner's first term for purposes of the two-term limitation.	The rationale is for each Commissioner to be able to serve at least five or six years in total, if they would like.
2	The bill would expand the definition of "election" in Maine's campaign finance law (Title 21-A, Chapter 13) to include ballot question elections – not just candidate elections.	Chapter 13 of the Election Law applies to both candidate and ballot question elections. The definition of "election" should correspond to the actual coverage of Chapter 13.
3	Current law requires the Commission to keep certain investigative documents confidential, but the Commission may release them if they are "materially relevant to a finding of fact, violation or other decision."	The proposed change would clarify that the Commission has the discretion to release a memorandum or report by the Commission staff <u>even before</u> the Commission makes a finding of fact, violation or other decision. Public access to a staff memo or report can be important to the public's understanding of the enforcement matter.
4	The bill would modify the information that state party committees must provide to the Commission every two years concerning municipal and county party committees (e.g., the Bangor Republican Committee or the York County Democratic Committee). The Commission proposes to receive the contact information in June after the caucuses, and to receive contact information specifically for the committee chair and treasurer.	Party committees organized at the town and county level are required to file two or three campaign finance reports per year, if they raise or spend more than \$1,500. The Commission sends reminder postcards to all local party committees of filing deadlines, even though most are exempt.
5-6	Section 1014 requires that certain paid communications to voters concerning candidates must include a statement of who paid for the communication and whether a candidate authorized the communication. The Commission proposes modifying the time periods before an election when communications that merely name or depict a candidate must contain this information.	The Commission proposes that the disclosure be required for any paid communication naming or depicting a candidate disseminated to voters within 28 days before a primary election and between Labor Day and the general election. These time periods are consistent with changes to the independent expenditure reporting statute that were approved by Maine voters in the 2015 citizen initiative.
7-8	The Commission proposes that candidates who are unopposed in an election would <u>not</u> have to file a 24-Hour Report of contributions or expenditures of \$1,000 or more during the 13 days before an election.	Because most general elections are opposed, this proposal (if enacted) is most likely to have an effect in <i>primary elections</i> for legislative and county office. The larger pre-election transactions in the regularly scheduled report due 42 days after the primary election.
9	Candidates would be required to include the addresses of their vendors in campaign finance reports – similar to the requirements for PACs, state and local party committees, and ballot question committees.	Under current law, candidates are required to report the name of their vendors, but not their addresses. Some candidates purchase goods and services from vendors in other parts of the United States, or from individuals or businesses that are hard to pin down by name only. Around 60% of legislative candidates participate in the Maine Clean Election Act program and it is important to understand how they have spent their public campaign funds.

10	After an election, a traditionally financed candidate could spend surplus campaign funds on a recount election.	Candidates may rarely need to spend their own campaign funds for a recount, but the question has arisen in questions from candidates. MCEA candidates could not spend campaign funds on a recount.
11	Party committees are required to disclose all expenditures made to influence "a campaign" (a candidate or ballot question election), including contributions to a candidate, another party committee or a PAC. The Commission proposes inserting the term "ballot question committees" and deleting	The term "ballot question committee" should be added to the statute for completeness. The Commission recommends deleting the term "political committee," because that term is not defined in campaign finance law.
12	Clarifies the filing schedule for state party committees. They must file quarterly campaign finance reports every year. In a candidate election year, the 11-day pre-election and 42-day post-election reports would be required for both the primary and general elections. In other years, the 11-day pre-election report and 42-day post-election report would be required for special elections and ballot question elections only if the state party committee received or spent money to influence that election.	These statutory changes are intended to codify current practice, and not change the current schedule.
13	Municipal and county party committees would not be required to file 24-Hour Reports during the 13 days before a <i>primary</i> election.	Local parties would continue to file 24-Hour Reports before a general election, if the committee received a contribution of \$5,000 or more or made an expenditure of \$1,000 or more.
14	In 2001, the Legislature adopted a requirement that if a membership organization (business association or trade union) spends more than \$50 to expressly advocate for or against a candidate, the organization needs to file a one-time financial report. The Commission staff recommends an incremental change in the spending threshold to \$100 per candidate.	The threshold of spending \$50 to influence a candidate's election is one of the lower thresholds for filing a campaign finance report, and significantly lower than the \$250 threshold for filing an independent expenditure report. Goods or services with a value of \$50 in September 2001 were worth \$72 in April 2019.
15	Under the current law, a paid communication to voters after Labor Day that names or depicts a clearly identified candidate is <i>presumed</i> to be an independent expenditure, which requires the filing of a campaign finance report. The spender may try to rebut the presumption within 48 hours of the expenditure by presenting evidence that the spender did not intend to influence the election.	To provide a more reasonable opportunity for this rebuttal procedure, the Commission proposes changing the deadline for submitting the rebuttal statement to within 48 hours of disseminating the communication – rather than within 48 hours of incurring an obligation or expenditure for the communication (which can occur days or weeks before the communication is disseminated to voters).
16	Increases the penalty for not registering as a candidate from \$10 to \$100.	It is reasonable to expect individuals seeking public office to file a simple form with contact information and identify a treasurer and any other officers. Some candidates do not register, even after multiple contacts by the Commission. The current penalty of \$10 has little punitive value.

17 & 24	Clarifies the maximum penalty if a PAC, party committee or ballot question committee does not submit a substantially correct campaign finance report on time containing more than \$50,000 in contributions or expenditures.	The maximum penalty under current law is 100% of the amount that was not reported on time. The Commission seeks to confirm that if a report that is not substantially complete (<i>e.g.</i> , misstates the contributors), the maximum penalty is the same as though the report was filed late.
18-19	Fixes the description of coverage of Chapter 13, Subchapter 4 to relate to both political action committees and ballot question committees.	The description of coverage and definition should be updated to include ballot question committees. They are organizations that have a pre-existing purpose and that spend more than \$5,000 to influence a Maine election (<i>e.g.</i> , a national advocacy organization, or Maine trade group or labor association).
20-21	Under current law, certain types of paid communications to voters to influence a ballot question must contain a statement of who financed the communication. The Commission proposes that paid telephone calls should be subject to this requirement and a penalty of up to \$5,000 for the missing disclosure.	When the statute was enacted in 2013, telephone calls were not covered by the statute, and no penalty was prescribed.
22	Current law contains an exception for donors that make contributions to a PAC or BQC. The Commission proposes to clarify this donor exception by moving it to its own sentence near the end of the first paragraph of the section.	The Commission seeks to avoid a legal interpretation that an organization is not required to register with the Commission even if it had raised contributions to influence a ballot question election as long as it donates those funds to a PAC or BQC.
23	Clarifies the filing schedule for PACs (please see section 12).	The filing schedule for PACs would be the same as for state party committees.
24	Please see description for sec. 17 above.	
25	Modifies the definition of qualifying contribution (QC) in the Maine Clean Election Act to acknowledge that candidates collect QCs in cash (in addition to check or credit card)	The Maine Clean Election Act (MCEA) and Commission procedures have allowed QCs by cash, since the program began in 2000.
26	The MCEA requires candidates to file a "declaration of intent" (a one-page form) once they decide to qualify for public campaign funding. Under current law, if a candidate were to collect QCs before filing the declaration of intent, the QCs are valid only if collected during a short window of time: five business days before the filing of the declaration of intent.	The Commission proposes that the same restriction apply to additional qualifying contributions collected to qualify for supplemental payments of MCEA funds.
27	Changes the term "participating candidate" to "certified candidate" in seed money statute.	Candidates who have qualified for MCEA funds ("certified candidates") may not use those funds to pay for goods and services received before they qualified for MCEA funding.
28	Reorganizes the subsection of the MCEA relating to qualifying contributions. Introduces an alternative procedure for collecting QCs in cash.	MCEA candidates could use cash collected from multiple contributors to purchase a single money order or cashier's check to submit to the Commission.
29	Clarifies that the same procedures for collecting qualifying contributions to receive <i>initial payments</i> MCEA funding also apply to collecting additional qualifying contributions to qualify for <i>supplemental payments</i> .	The procedures for collecting QCs and additional qualifying contributions are essentially the same.

30 (1 st ¶), 31	Directs the Commission to establish a receipt and acknowledgement form for voters to confirm that they made a QC. A QC would not be valid if someone other than the contributor signs the form, except under special conditions.	The Commission has used versions of this form since the MCEA program began in 2000.
32	Maine Clean Election Act candidates could not use MCEA funds to purchase campaign goods or services from the candidate's spouse or domestic partner, or a business owned by the candidate or the candidate's spouse or domestic partner.	Under current law, these payments are allowed if the goods or services are for a legitimate campaign-related purpose; the payee regularly provides the goods or services in the normal course of their occupation or business; and the cost is reasonable. The Commission is concerned that payments to the candidate's spouse or domestic partner, or a related business, could be viewed by the public as self-serving, even if the goods or services are for legitimate campaign goods and services.
33	The Commission proposes a change in terminology.	The statute which governs when additional qualifying contributions may be collected should refer to "certified candidates" in addition to "participating candidates."

**Section-by-Section Summary of LD 1721 –
Ethics Commission Agency Bill**

Sec. 1. Terms of Commissioners (1 M.R.S.A. § 1002(1-A)(D))

Current law. Members of the Ethics Commission may serve two terms. Each term has a maximum length of three years, which suggests an intention that Commissioners should be able to serve for six years. In practice, however, the first term of some Commissioners (when they are filling a vacancy) can be much shorter – sometimes just a few months. The result is that Commissioners sometimes serve much less than six years. For example:

First Term	Second Term	→	Result
5 months	3 years		Commissioner serves total of 3 years, 5 months.

Commission proposal. The Commission proposes an amendment to make sure that Commissioners serve at least five years. The Commission’s proposal is that if a Commissioner’s first term is less than two years, that period would not count as the Commissioner’s first term for purposes of the two-term limitation. For example:

Filling Vacancy	First Term	Second Term	→	Result
5 months	3 years	3 years		Commissioner serves total of 6 years, 5 months.

Sec. 2. Correcting the definition of “election” to include ballot questions (21-A M.R.S. § 1001(2))¹

The Commission proposes modifying the definition of “election” for Chapter 13 of the Election Law. This is intended as a clarification and would not change the Commission’s jurisdiction or activities.

Chapter 13 relates to both candidate and ballot question elections, but the definition of election in section 1001(2) refers only to “any ... election for state or county office or municipal office” and excludes ballot questions. The Commission proposes expanding the term to include “any referendum”, which is defined in 21-A M.R.S. § 1(36) to mean

¹ Below, references to sections of the Maine Revised Statutes are to the Election Law (Title 21-A), unless otherwise noted.

“an election for the determination of a question.” This would be more consistent with the duties currently assigned to the Commission under Chapter 13.

FYI – Under 30-A M.R.S. § 2502, the state’s campaign finance law applies to towns and cities with a population of 15,000 or more. In those municipalities, candidates, PACs and ballot question committees (BQCs) must register and file campaign finance reports similar to legislative elections, except that the registrations and reports are filed with the municipal clerk, rather than the Commission.

Sec. 3. Ensuring the Commission may release memos and reports by the Commission staff (§ 1003(3-A))

Since 2008, the Commission has been authorized under § 1003(3-A) to keep certain documents confidential when conducting investigations in enforcement matters. The statute covers financial information of those outside the Commission (*e.g.*, candidates, political parties, or PACs), but also “intra-agency communications” between employees and members of the Commission (*e.g.*, memos, emails, reports).

When the Commission is conducting an enforcement matter at a public meeting, it is important for the public to have access to the facts and the law that the Commission is considering, which is typically laid out in a memo or report by the Commission staff to its members.

The Commission proposes a change in the confidentiality provision (§ 1003(3-A)) to clarify that the Commission has the discretion to release a staff memo or report (and related documents) *prior to* a finding of fact or conclusion of law by the Commission. The subject of the investigation whose information would be made public would be provided with an opportunity to see the memorandum before its release and to assert any claims of privilege or confidentiality. Any such claims could be addressed through redactions.

For years, the Commission assumed that it had this discretionary authority, but it was challenged in 2017 by the respondents in the York County casino matter.

Sec. 4. Obtaining contact information for town and county party committees (§ 1013-A(3))

Under current law, state party committees provide names and addresses of the officers of their municipal and county party committees to the Commission in April of the election year (*e.g.*, the Falmouth Republican Town Committee, or the Kennebec County Democratic Committee). The Commission uses this list to send reminder postcards to the officers two or three times per year, before each filing deadline. Many

of these party committees have no idea they might have to file a campaign finance report if they raise or spend more than \$1,500 in a calendar year.

The Commission proposes moving the date of that annual list to June 15th to be after the caucuses and state conventions, and the party would specifically provide the contact information for the chair and treasurer of each committee.

Sec. 5 & 6. Paid communications to voters close to an election (§§ 1014(2-A) & (5))

Section 1014 requires that paid communications to voters concerning candidates must include a statement of who made the expenditure for the communication and whether a candidate authorized the communication. Subsections 1 and 2 relate to communications that expressly advocate for the election or defeat of a candidate. Subsections 2-A and 5 require the "paid for and authorized by" statement during limited time periods before a primary, special, or general election for communications that merely name or depict a clearly identified candidate.

The 2015 citizen initiative expanded similar time periods in the independent expenditure reporting statute (§ 1019-B(1)(B)) that control when non-express advocacy communications to voters are presumed to be independent expenditures and require a financial report to the Commission. The Commission proposes that the time periods in §§ 1014(2-A) and (5) be expanded to be consistent with § 1019-(1)(B).

Sec. 7 & 8. Clarifies that a 24-Hour Report is not required for a candidate who is unopposed in an election (§ 1017(2))

Some candidates find it burdensome to file 24-Hour Reports during the last 13 days before an election. A 24-Hour Report is required if a candidate receives a contribution of \$1,000 or more or makes an expenditure of \$1,000 or more during this period. If a candidate misunderstands or forgets this requirement, the candidate can be assessed a penalty for not filing a 24-Hour Report on time.

The Commission proposes that a candidate who does not have an opponent in an election would not be required to file 24-Hour Reports in the last 13 days before that election. The candidate would disclose these larger contributions or expenditures in the regular report due 42 days after the election. (Most often, this would apply in a primary election where a party candidate does not have an opponent.)

Sec. 9. Requiring candidates to report an address for their payee (§ 1017(5))

In campaign finance reports filed with the Commission, PACs, BQCs and party committees are required to disclose the name and the address of each payee. Candidates have not been required to report the address, only the name.

The Commission proposes that candidates be required to report the addresses of the payees that sold goods or services to the candidates. Around half of the candidates for the Legislature participate in the Maine Clean Election Act program, and it is important to understand how they have spent their public campaign funds. Some candidates purchase goods and services from vendors located outside Maine, or from individuals or businesses under assumed names that are hard to identify. Within Maine, there are dozens of post offices and retail stores with the same name but different locations.

Due to an update in the Commission's electronic filing system in 2014, the online forms used by candidates to enter contributions called for them to enter an address for their payees. Almost all candidates entered an address in 2014, 2016, and 2018 without questioning it.

Sec. 10. Allowing traditionally financed candidates to use surplus funds for recount expenses (§ 1017(8))

Section 1017(8) requires candidates to dispose of unspent campaign funds within four years of the election for which the funds were raised. This statute applies only to traditionally financed candidates who have raised campaign contributions and not to Maine Clean Election Act candidates.

The Commission proposes acknowledging that the candidate (rather than the campaign treasurer) will more often be the person making the post-election decision of how to dispose of surplus funds. In response to questions from candidates, the Commission proposes permitting candidates to spend surplus funds for recounts. This proposal may rarely be needed, because candidates do not necessarily need to incur any expenses for a recount, as legal representation is sometimes provided to candidates by their political parties.

 **Sec. 11. Expenditures reported by party committees (§ 1017-A(2)(A))**

Party committees are required to disclose all expenditures made to influence "a campaign" (e.g., a candidate or ballot question election), including contributions made by the party committee to a candidate, PAC, or another party committee. The Commission proposes inserting the term "ballot question committees" in the list of payees that must be disclosed. The Commission suggests deleting the term political committee, which is not defined in the campaign finance law (Chapter 13 of the Election Law).

Sec. 12. Filing schedule for state party committees (§ 1017-A(4-A))

In sections 12 and 23, the Commission proposes statutory changes to clarify the filing schedule for state party committees and PACs. The Commission is not seeking to change the current filing schedules. Rather, we are attempting to clarify the statutory language to reflect current practice. These changes would also affect BQCs, which by statute are under the same filing deadlines as PACs.

Paragraph A – state party committees would need to file quarterly reports every year.

Paragraph B – in a candidate election year, state party committees would also file reports 11 days before and 42 days after the primary and general elections.

Paragraph C – in an odd-numbered year, state party committees would file the 11-day and 42-day reports only if the state party were raising or spending money to influence a special election, a ballot question election, or a municipal election in a town or city with a population of 15,000 or more.

Paragraph D – in a candidate election year, state party committees would file 24-Hour Reports before each primary and general election. (Please note that the reports would be required before a primary or general election even if the contribution or expenditure was not for the purpose of influencing the election.) During odd-numbered years, the 24-Hour Reports would be required only if the state party committee were spending money to influence an election in that year.

Sec. 13. No 24-Hour Report for municipal and county party committees for a primary election (§ 1017-A(4-B))

The Commission proposes a clarification that municipal and county party committees (*e.g.*, the Cumberland County Democratic Committee, or the Bangor Republican Committee) would be required to file 24-Hour Reports only for the general election, and not for a primary election. (If these committees raise and spend less than \$1,500 per year, no reports are required whatsoever.)

Sec. 14. Spending threshold to require a membership organization to file a campaign finance report (§ 1019-A)

Some membership organizations, such as business associations, labor unions, and trade associations, communicate with their members concerning political candidates. Communications from a membership organization to its members are exempt from the definition of "expenditure" in the Election Law (21-A M.R.S.A. §§ 1012(3)(B)(3) & 1052(4)(B)(3)). That means that the organizations do not need to form PACs or file

independent expenditure reports based on their advocacy communications to their own members.

In 2001, the Legislature adopted a requirement that if a membership organization spends more than \$50 to expressly advocate for or against a candidate, the organization needs to file a one-time report. (The Commission receives relatively few membership communication reports – six were filed in 2018).

The threshold of spending \$50 to influence a candidate's election is one of the lower thresholds for filing a campaign finance report, and significantly lower than the \$250 threshold for filing an independent expenditure report. The Commission staff recommends an incremental change to \$100 per candidate. (Goods or services with a value of \$50 in September 2001 were worth \$72 in April 2019.)

Sec. 15. Presumption period for independent expenditures (§ 1019-B(2))

Between Labor Day and a general election, if an organization spends more than \$250 on a communication that names or depicts a clearly identified candidate, the communication is presumed to be an independent expenditure which requires filing a financial report with the Commission. The law provides an opportunity for the organization to rebut this presumption by presenting evidence to the Commission that the paid communication was not intended to influence the candidate's election.

To provide a more reasonable opportunity for this rebuttal procedure, the Commission proposes changing the deadline for submitting the rebuttal statement to within 48 hours of disseminating the communication – rather than within 48 hours of incurring an obligation or expenditure for the communication (which can occur days or weeks before the communication is disseminated to voters.) Independent expenditure reports no longer impact the payment of Maine Clean Election Act funds, which required a short deadline. Also, a single communication may involve multiple financial obligations or payments to different vendors. So, a deadline of 48 hours after the communication's dissemination is a simpler and more reasonable deadline for everyone to understand.

Sec. 16. Increasing the penalty for not filing a candidate registration from \$10 to \$100 (§ 1020-A(1))

Each election year, some candidates for legislative and county offices fail to register with the Commission, even after multiple attempted contacts by the Commission staff. In the late spring of the election year, the Commission sometimes needs to initiate an enforcement process in order to persuade some individuals to register. The Commission proposes increasing the penalty for failing to register from \$10 to \$100. The current penalty of \$10 is so small that it has little punitive value. Whether the office

is municipal, county, or legislative, the public deserves to have each candidate for public office file a simple form providing contact information and identifying a treasurer and other officers.

Sec. 17. Maximum penalties when a campaign finance report is filed late or does not substantially conform to disclosure requirements (§ 1020-A(5-A))

Under this proposal, the Commission seeks to clarify that if contributions or expenditures exceeding \$50,000 are disclosed in a campaign finance report, but the details of the transactions are incomplete or inaccurate, the maximum penalty is 100% of the amount that was reported incompletely or inaccurately. This clarification is intended to avoid a potential legal interpretation of current law argued for by respondents in the York County casino matter. They argued that, under current law, if the amount of contributions was correctly disclosed in a campaign finance report, the higher penalties would not apply, even though the reports did not correctly name the actual contributor.

Sec. 18 & 19. Clarification of coverage of Chapter 13, Subchapter IV (§§ 1051 & 1052)

Chapter 13, subchapter IV sets out the registration and campaign finance reporting requirements for both PACs and BQCs. The Commission proposes amendments to Sections 1051 and 1052 to clarify that certain provisions in this subchapter relate both to PACs and BQCs.

Sec. 20. Pre-recorded phone calls to influence a ballot question (§ 1055-A(1))

Section 1055-A requires a "paid for" disclosure statement in any communication to voters costing more than \$500 that expressly advocates for or against a ballot question. Enacted in 2013 at the suggestion of the Commission, this requirement is analogous to the "paid for" requirement in candidate election communications in Section 1014.

The Commission proposes broadening the requirement to cover telephone calls, which would be analogous to Section 1014(5). (The Commission staff is unsure why telephone calls were omitted from the statute, when originally enacted in 2013.) If members of the public are receiving a paid automated or scripted telephone call expressly urging them to vote for or against a ballot question, it could assist them in evaluating the message if the speaker disclosed which organization sponsored the communication. Because of time limitations in automated calls, we suggest omitting the address requirement (also analogous to Section 1014(5)).

Sec. 21. Penalty for omitting the “paid for” message in ballot question communications (§ 1055-A(3))

The Commission’s original 2013 proposal did not include a penalty provision. Although the Commission is aware of very few violations of this disclosure requirement, someday a violation could occur that is viewed as significant and the Election Law could appear ineffective if there is no penalty. This proposed penalty provision is based on Section 1014(4).

Sec. 22. Clarifying the donor exception – ballot question committee statute (§ 1056-B)

Under 21-A M.R.S. § 1056-B, individuals or organizations that do not qualify as a PAC, but that receive or spend more than \$5,000 for the purpose of initiating or influencing a ballot question are required to register with the Commission as BQCs and file campaign finance reports according to the same schedule as PACs.

Current law contains an exception for donors that make contributions to a PAC or BQC. This exception appears in the second line of §1056-B in the phrase “other than by contribution to a political action committee or a ballot question committee.” The rationale for the exception is that merely making a cash donation greater than \$5,000 to a PAC or BQC should not, in itself, require filing ongoing financial reports with the State of Maine. The public is adequately served if the PAC or BQC lists the donor in the campaign finance reports.

In two high-profile matters, advocates have stretched the current exception beyond its intended meaning to argue that an organization is not required to register with the Commission even if it had raised contributions to influence a ballot question election as long as it donates those funds to a PAC or BQC. To avoid this interpretation and to achieve greater clarity, the Commission proposes to move this donor exception to its own sentence near the end of the paragraph of the section (“A person whose only payments of money ...”)

Sec. 23. Filing requirements for PACs (§ 1059)

In sections 12 and 23, the Commission proposes statutory changes to clarify the filing schedule for state party committees and PACs. We are not seeking to change the current filing schedules. Rather, we are attempting to clarify the statutory language to reflect current practice. These changes would also affect BQCs, which by statute are under the same filing deadlines as PACs.

Paragraph A – PACs would need to file quarterly reports every year.

Paragraph B – in a candidate election year, PACs would also file reports 11 days before and 42 days after the primary and general elections.

Paragraph C – in an odd-numbered year, PACs would file the 11-day and 42-day reports only if the PAC were raising or spending money to influence a special election, a ballot question election, or a municipal election in a town or city with a population of 15,000 or more.

Paragraph D – in a candidate election year, PACs would file 24-Hour Reports before each primary and general election. (Please note that the reports would be required before a primary or general election even if the contribution or expenditure was not for the purpose of influencing the election.) During odd-numbered years, the 24-Hour Reports are required only if the PACs were spending money to influence that election.

Sec. 24. Maximum penalties when a campaign finance report is filed late or does not substantially conform to disclosure requirements (§ 1062-A(4))

Under this proposal, the Commission staff seeks to clarify that if contributions or expenditures exceeding \$50,000 are disclosed in a campaign finance report, but the details of the transactions are incomplete or inaccurate, the maximum penalty is 100% of the amount that was reported incompletely or inaccurately. This clarification is intended to address a legal interpretation of current law proposed by respondents in the York County casino matter. They argued that, under current law, if the amount of contributions was correctly disclosed in a campaign finance report, the higher penalties would not apply even though the reports did not correctly name the actual contributor.

Sec. 25. Collection of qualifying contributions in cash (§ 1122(7))

To receive initial payments of Maine Clean Electon Act (MCEA) funds, candidates must collect a minimum number of \$5 qualifying contributions (QCs) by check, online payment or cash. The Commission's past practice has been to allow a candidate to receive QCs in cash, provided that the candidate uses that cash to reimburse him- or herself or others for the purchase of a money order that is subsequently signed by the contributor and submitted to the Commission.

In § 1122(7)(A), the Commission proposes to change the definition of qualifying contribution to reflect that candidates may collect QCs in cash.

Sec. 26. Filing declaration of intent before collecting additional qualifying contributions (§ 1125(1))

The MCEA requires candidates to file a “declaration of intent” (a one-page form) once they decide to qualify for public campaign funding. Under current law, if a candidate were to collect QCs before filing the declaration of intent, the QCs are valid only if collected during a short window of time: five business days before the filing of the declaration of intent. QCs collected earlier than the five-business-day period are invalid and will not count toward qualifying to receiving initial payments of MCEA funds. The Commission proposes that the same restriction apply to additional qualifying contributions collected to qualify for supplemental payments of MCEA funds.

Sec. 27. Change in terminology from “participating candidate” to “certified candidate” (§ 1125(2-A))

This is a proposed change in terminology in the statute that governs the collection and spending of seed money by MCEA candidates. These are contributions of up to \$100 that MCEA candidates may collect from individuals to start their campaigns.

The last sentence of paragraph 2-A(A) prohibits an MCEA candidate from using MCEA funds retroactively to pay for goods and services that helped them qualify for MCEA funding. In this scenario, the term “certified candidate” (someone who has qualified for MCEA funding) would be more appropriate than “participating candidate” (someone who is attempting to qualify).

Sec. 28. Collection of QCs in cash (§§ 1122(1) & 1125(3))

Section 1125(3) sets out the procedures by which candidates collect QCs by check, online payment, or cash, in order to receive initial payments of MCEA funding. The Commission proposes breaking it down into paragraphs to make the subsection easier to digest, and also proposes an alternative to the current procedures for collecting QCs in cash (in paragraph F).

Paragraphs D and E restate current law, except that the second sentence of paragraph E clarifies that if a contributor erroneously makes a QC by writing a check payable to *the candidate*, the Commission may endorse the check to the proper payee (the Maine Clean Election Fund). This would reflect a current practice of the Commission.

Paragraph F relates to QCs made by cash. Under current law, the Commission’s past practice has been to allow a candidate to receive QCs in the form of \$5 in cash, provided that the candidate uses that cash to reimburse him- or herself or others for the purchase of a money order that is subsequently signed by the contributor and submitted to the Commission. This has required candidates to purchase dozens of

money orders (all at a fee), and to have the money orders available for the contributor to sign at the time of receiving a cash contribution (which can be unpredictable) or obtain a signature from the contributors after the contribution, which requires a second meeting.

In paragraph F, the Commission proposes an alternative procedure which we hope would be more efficient. This method was proposed in 2017 by Sen. David Miramant in LD 585 (128th Legislature). Under this procedure, the contributor would need to sign a special form affirming that they gave \$5 in cash. The Commission staff used a version of this form in 2018 when a candidate submitted a money order that was not signed by the contributor. The form is designed for one contribution only, so the affirmation is difficult for the contributor to miss or misunderstand.

After receiving \$5 in cash from multiple contributions, the candidate would use that cash to purchase a single money order that would be submitted to the Commission. The advantages of this proposal are that candidates would not need to visit a vendor such as the U.S. Post Office or Wal-Mart to purchase dozens of money order and have the money orders on hand when they might receive cash contributions, or purchase the money orders after the contributions and return to the contributors to obtain their signatures. The candidates would merely need to have the blank cash contribution forms with them anytime they are in public when someone might give them \$5 in cash. Another benefit is that the candidates would not need to pay for multiple fees for money orders, or account for those fees in campaign finance reports.

The Commission's proposal is that the candidate could use either procedure: (1) Sen. Mirmant's idea of combining the cash contributions into a single money order, or (2) the traditional method of submitting separate money orders signed by the contributors. The traditional method is described in paragraph G.

Paragraph H specifies how the candidate should report the fees paid to the vendor when money orders are purchased for this purpose. (Usually the money orders are purchased by the candidate, but not always.) The Commission proposes one accommodation to simplify the process for candidates: if a candidate purchased money orders with personal funds, the candidate would not need to account for the fees as an in-kind contribution in the candidate's seed money report. Fees paid by other people would be an in-kind contribution to the candidate.

Paragraphs I and J retain certain language currently in statute authorizing the Commission to establish a website for members of the public to make QCs electronically and forbidding the submission of fraudulent QCs.

Sec. 29. Additional QCs (§ 1125(3-A))

Section 1125(3-A) relates to the additional qualifying contributions that candidates may collect to qualify for supplemental payments. The last sentence is inserted to clarify that the same procedures and restrictions set out in subsection 3 for contributions collected to qualify for the initial payments of MCEA funds also apply to additional qualifying contributions.

Sec. 30 (first paragraph). Receipt and Acknowledgment Forms (§ 1125(3-B))

Part of the definition of QC in § 1122(7)(D) is that the contributor must acknowledge in writing that the contribution was made from the contributor's personal funds and was not given in exchange for receiving anything of value. Since 2000, the Commission has used a "Receipt and Acknowledgement Form" for this purpose. The proposed subsection 3-B directs the Commission to develop such a form and invalidates a QC if anyone other than the contributor signs the contributor's name to the form (with some exceptions for a contributor who is physically unable to sign). This reflects current practice. (If the spouse or domestic partner of a contributor signs the Receipt and Acknowledgement Form, the Commission does not count the QC as valid and we ask the candidate to obtain the contributor's signature on the form.)

Sec. 30 (second paragraph) & 31. Residency requirements (§§ 1125(3-B), (3-C) & 1125(5-A))

Typically, during an election year, the Commission staff receives concerns that a few candidates are running for the Legislature without meeting the requirements in the State Constitution to be a resident of the legislative district:

- (1) The candidate must be a resident in the legislative district for three months prior to the candidate's election.
- (2) The candidate must be a resident of the district at the time of their nomination for placement on a primary, general or special election ballot.²

² For example, Article IV, Part First, Section 4 states as follows (underlining added for emphasis)

No person shall be a member of the House of Representatives, unless the person shall, at the commencement of the period for which the person is elected, have been 5 years a citizen of the United States, have arrived at the age of 21 years, have been a resident in this State one year; and for the 3 months next preceding the time of this person's election shall have been, and, during the period for which elected, shall continue to be a resident in the district which that person represents.

No person may be a candidate for election as a member of the House of Representatives unless, at the time of the nomination for placement on a primary, general or special election ballot, that person is a resident in the district which the candidate seeks to represent.

The Commission believes it is not appropriate for a candidate to receive MCEA funding if they do not meet both requirements prior to their election – regardless of whether they win the election.

There is no process currently for a concerned voter in the legislative district (or a political opponent) to complain that a candidate who is receiving public campaign funds under the MCEA does not meet the residency requirements. A registered voter from the district has only a five-business-day period to challenge a candidate's nominating petition, and that period occurs in March (for party candidates) or June (for non-party candidates) of the election year. Relevant information about residency may not come to light until after those challenge periods have expired. Under the State Constitution, the Maine House of Representatives and the Senate judge the qualifications of their own members. This does not apply, however, to candidates who have lost the general election.

The Commission acknowledges that some of the concerns we hear from the public are based on incomplete knowledge of the candidate's circumstances and/or a misunderstanding of how residency is defined for voting purposes in 21-A M.R.S. § 112. If this provision is enacted, the Commission might receive only one or two complaints per election cycle relating to MCEA candidates that are worthy of investigation. Nevertheless, the Commission makes this proposal so that members of the public may have a forum in which to air their concerns effectively.

Sec. 32. Payments to family members (§ 1125(6-C))

Under current § 1125(6-C)(A), an MCEA candidate is strictly prohibited from paying public campaign funds to compensate the candidate or a sole proprietorship of the candidate for campaign services. Under subsection 6-C(B), the candidate may compensate a members of the candidate's immediate family or household, but only if three conditions listed in the paragraph are met. The same conditions are required if the candidate wishes to compensate a business entity owned by the candidate, an immediate family member or household member.

The Commission proposes language that would extend the strict prohibition in subsection 6-C(A) to the candidate's spouse or partner, or a business entity owned by the candidate, or spouse or partner, to avoid any appearance that MCEA funds were used for self-serving reasons. As background, please be aware that the term "immediate family" is defined in 21-A M.R.S. § 1(20) more broadly than one might expect, and includes grandchildren and in-laws.

Sec. 33. Fixing terminology (§ 1125(8-E))

We propose inserting "or certified" to this subsection, because most additional qualifying contributions are collected by certified candidates.



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

To: Commissioners
 From: Jonathan Wayne, Executive Director
 Date: January 20, 2026
 Re: Request to Investigate Maine Democratic Party

Mr. Alex Titcomb has filed a request to investigate the Maine Democratic Party (“MDP”) concerning its 2025 financial activities to oppose Question 1 on the November 4, 2025 ballot, which was a citizen initiative to restrict absentee voting. ETH 1-12. Mr. Titcomb asserts that the MDP qualified as a ballot question committee because it received and spent more than \$5,000 to oppose Question 1. Therefore, he argues, it was required to register and file campaign finance reports as a ballot question committee. (The ballot question committee statutes are listed in the left column in the table at the bottom of this page.)

In response (ETH 15-20), the MDP acknowledges that it spent approximately \$250,000 to oppose Question 1 but states that it complied with Maine campaign finance law because it reported its anti-Question 1 financial activities in the regular campaign finance reports it filed as a party committee under a different statute, 21-A M.R.S. § 1017-A. Mr. Titcomb replies that even if those party committee reports were the correct way for the MDP to disclose its anti-initiative activities, the MDP did not file all the required reports and did not clearly designate in its reports which expenditures were made against Question 1. ETH 21-22.

The major issue of contention in this enforcement matter is:

- Do *both sets of reporting statutes* (ballot question committee and party committee) apply when a party committee raises and spends more than \$5,000 to influence an initiative, or *only the party committee reporting statute*?

Ballot Question Committee Statutes (Title 21-A)	Party Committee Statute (Title 21-A)
§ 1052(2-A) – definition § 1052-A(1)(A-1) - registration § 1059 - schedule for campaign finance reports § 1060 - content of campaign finance reports	§ 1017-A

LEGAL REQUIREMENTS (ETH 55-62)

Campaign finance reporting responsibilities of state party committees

Party committees generally. Political parties are organizations that have met the qualifications in 21-A M.R.S. §§ 301-303 to select their nominees through a primary election and have their party designation listed on the general election ballot. In Maine, political parties have a state committee which must hold a biennial convention. Each qualified party also has municipal committees that must meet periodically for the party to maintain its qualified status. The state party committee may also provide for the establishment of county party committees.

One widespread expectation of party committees is that they advocate for their nominees in general elections. The Election Law, however, does not prevent party committees from influencing referenda and initiatives, which they do occasionally.

Campaign finance reporting responsibilities. Party committees are required to submit campaign finance reports to the Commission pursuant to 21-A M.R.S. § 1017-A, unless they are exempt because they had less than \$1,500 in financial activity during a calendar year. ETH 55-57. The required contents of the reports are set out in § 1017-A(1)-(3). Among other things, subsection 2 states that “[a] party committee shall report all expenditures made to influence a campaign, as defined in section 1052, subsection 1.” (underlining and italics added for emphasis). The term “campaign” is defined in 21-A M.R.S. § 1052(1) to refer to both candidate and ballot question elections.

Filing schedule in candidate election years. The filing schedule for state party committees is set out in § 1017-A(4-A). Each year they are required to file four quarterly campaign finance reports. During years with primary and general candidate elections, party committees must also file reports 11 days before and 42 days after the primary and general elections.

Filing schedule in other years. In odd-numbered years, *if* a state party committee has received contributions or made expenditures for the purpose of influencing a ballot question election, a special election, or a municipal election, the state party committee must file reports 11 days before and 42 days after that election. ETH-56. The committee would also have to file 24-Hour Reports during the last 13 days before the election if they have transactions over certain thresholds to influence the ballot question. *Id.*

Ballot question committees

Context - what is a ballot question committee? Maine campaign finance law provides for a “ballot question committee” reporting status that applies to an entity or association that raises or spends more than \$5,000 to influence a ballot question. The definition is indented below on this page. In practice, a ballot question committee may be group of individuals or organizations that have associated together to initiate a law (usually called a citizen or direct initiative) or repeal a law enacted by the Legislature (a people’s veto referendum). Sometimes, a pre-existing organization, such as a policy advocacy group or commercial entity will need to register a ballot question committee. The ballot question committee may be incorporated as a nonprofit corporation or LLC, but more often they are unincorporated voluntary associations.

The registration and reporting responsibilities of ballot question committees are similar to political action committees (PACs), except that PACs generally influence candidate elections and ballot question committees influence initiatives and referenda. PACs often are ongoing committees that file campaign finance reports for years. The Commission staff requires each ballot question committee to register for a single initiative, referendum, or bond election, and then disband after terminating financial activity for that election.

Statutory definition. The term “ballot question committee” is defined as follows:

"Ballot question committee" means a person that receives contributions or makes expenditures aggregating in excess of \$5,000 for the purpose of initiating or influencing a campaign, other than a campaign for the nomination or election of a candidate. The term "ballot question committee" does not include a political action committee or an exempt donor.

21-A M.R.S. § 1052(2-A). ETH-58. For the Commission’s reference, “person” is defined broadly in campaign finance law to mean “an individual, committee, firm, partnership, corporation, association or of organization.” 21-A M.R.S. § 1001(3). Campaign” is defined as “any course of activities to influence the nomination or election of a candidate, or to initiate or influence ... [a] people’s veto referendum ...; [a] direct initiative ... ;” or other kind of ballot question 21-A M.R.S. § 1052(1). “Influence” is defined as “to promote, support, oppose or defeat.” § 1052(4-A).

Registration with the Commission. Once a ballot question committee receives contributions or makes expenditures exceeding \$5,000 for the purpose of influencing a ballot question, the committee must register with the Commission. 21-A M.R.S. § 1052-A(1)(A-1). In the registration, the ballot question committee identifies two officers and the initiative/referendum it is influencing, and provides other organizational information about the committee. § 1052-A(2).

Organizational requirements. A ballot question committee must open a campaign account with a bank or credit union and keep certain financial records. §§ 1054(2) & 1057.

Campaign finance reporting. The reporting schedule for ballot question committees is set out in 21-A M.R.S. § 1059(2). Every year, a ballot question committee must file four quarterly reports. § 1059(2)(A). In addition, they must file two campaign finance reports 11 days before and 42 days after the ballot question election which the committee was formed to influence. § 1059(2)(C). During the last 13 days before that election, the ballot question committee must also file 24-hour reports of any large transactions above certain thresholds. § 1059(2)(E).

Standard for initiating an investigation

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

FACTUAL BACKGROUND

Request by Alex Titcomb for Investigation (ETH 1-9)

Mr. Titcomb was the principal officer of the campaign organization that promoted Question 1. In a November 19, 2025 letter to the Commission, he asks the Commission to investigate whether the MDP disclosed its financial activity to oppose Question 1 as required by Maine campaign finance law. In particular, he questions whether the MDP should have registered and filed campaign finance reports as a ballot question committee. He cites the following activities:

- The MDP received three contributions totaling \$150,000 to oppose Question 1.
- Public job postings suggested that the MDP hired people to canvass households to oppose Question 1 (the compensation was listed as \$22 per hour) and also hired a deputy field director for the campaign to oppose Question 1 (expected compensation was listed as \$60,000).
- The MDP paid for campaign literature which Mr. Titcomb referred to as “palm cards, handouts.” Mr. Titcomb claims this literature was widely distributed through door-knocking. He also cites “large-scale events” involving “thousands of such items” which he estimates necessitated more than \$5,000 in printing and distribution costs.
- The MDP arranged for the production of apparel and buttons opposing Question 1. Mr. Titcomb contends that the MDP should have disclosed any expenditures for these products. If these items were sold online, he says the MDP should have reported the income as contributions.
- The MDP posted graphics and phone-banking communications to social media which Mr. Titcomb contends could have required paid staff or other expenses that should have been reported.

Mr. Titcomb concludes “Given the scale and visibility of these activities, the Maine Democratic Party’s apparent failure to register [as] a [ballot question committee] or file separate ballot-question reports has deprived the public of critical transparency into the sources and uses of funds during a high-profile referendum.” He requests a thorough investigation of the MDP’s activities to determine whether it complied with all registration and reporting requirements, including any missed 11-day pre-election report or 24-hour reports.

Response by the Maine Democratic Party (ETH 15-20)

The MDP responded to Mr. Titcomb’s request through a December 19, 2025 letter from its attorneys, Kate R. Knox and Lisa Prosienski. The MDP states that it received four contributions for purposes of opposing Question 1 from a ballot question committee, DGA Maine. (Commission staff could find only three such contributions.) It also acknowledges that it paid staff and spent money on printed literature and digital advertising to oppose the initiative. The MDP does not mention the other potential contributions or expenditures cited by Mr.

Titcomb, such as purchases and sales of apparel or buttons, and any costs for phone banking or social media.

The MDP responds that it disclosed the contributions it received and expenditures it made for purposes of Question 1 in the regular campaign finance reports that it filed as a state party committee. The MDP explains it was guided by 21-A M.R.S. § 1017-A, which “allows [a party] to report all candidate and ballot question activities on its Party Committees reports.” ETH-16. The MDP disagrees that it was required to register and file campaign finance reports as a ballot question committee. The MDP’s attorneys also refer to a September 26, 2025 email exchange between them and Political Committee and Lobbyist Registrar Heidi Hoefler, discussed below. The MDP argues no further investigation is necessary because it reasonably relied on statute, sought guidance from the Commission, and reported all activity on its regular committee reports.

Reply by Alex Titcomb (ETH 21-22)

Mr. Titcomb submitted a reply dated December 26, 2025. He maintains that the MDP – like any other “person” under Maine campaign finance law – was required to register and file reports as a ballot question committee after exceeding the \$5,000 threshold. He also asserts that, even if the MDP were allowed to disclose its ballot question committee activity only in its regular campaign finance reports as a state party committee, the MDP did not file campaign finance reports 11 days before and 42 days after the November 4, 2025 election, as required by 21-A M.R.S. § 1017-A(4-A)(C). He states that the specific nature and purposes of the MDP’s expenditures against the initiative are not discernible from its quarterly campaign finance reports.

Reporting by Maine Democratic Party

The MDP filed four quarterly reports to disclose its 2025 financial activities:

	End of Report Period	Deadline
April Quarterly Report	3/31/2025	4/10/2025
July Quarterly Report	6/30/2025	7/15/2025
October Quarterly Report	9/30/2025	10/6/2025
January Quarterly Report	12/31/2025	1/15/2026

The October and January Quarterly Reports are attached for your reference. ETH 23-54. The Commission staff recommends scanning those reports to evaluate Mr. Titcomb’s claim that the

expenditures made by the MDP for the purpose of opposing Question 1 cannot be identified. (In addition, the MDP filed reports in January-February 2025 related to a special election.)

September 26, 2026 Email Correspondence with Commission Staff

In the letter-response submitted by the MDP's attorneys, they cite an e-mail exchange between Kate Knox and the Commission's Political Committee and Lobbyist Registrar, Heidi Hoefler, on Friday, September 26, 2025. In that email, Ms. Knox expressed her reading of Maine campaign finance law, which is that party committees are to report all expenditures made to influence a ballot question campaign in their regular campaign finance reports filed under 21-A M.R.S. § 1017-A and are not required to register and file reports as a ballot question committee, which is a separate reporting status.

Ms. Hoefler responded at 5:20 p.m. and reiterated advice she had given three days earlier to the Sagadahoc County Democratic Committee which asked whether it needed to register as a ballot question committee if it engaged in ballot question activity to oppose Question 1. If you would like to delve into it, the email correspondence is attached for your reference. Ms. Hoefler did not provide "guidance" that party committees that influence ballot questions categorically do not need to register and report as a ballot question committee. Ms. Hoefler stated that under the applicable statute "a group is not required to register as a ballot question committee until it raises OR spends more than \$5,000 to influence a ballot question campaign" and that per 21-A M.R.S. § 1052-A, if a "person" meets the definition of ballot question committee, then it must register as a ballot question committee unless there is an applicable exception to the registration requirements.

EXECUTIVE DIRECTOR'S RECOMMENDATION

This matter presents conflicting views as to how Maine campaign finance law should be applied when a state party committee receives contributions or makes expenditures over \$5,000 to influence a ballot question:

- The MDP argues that it is sufficient for that financial activity to be reported in its regular campaign finance reports under 21-A M.R.S. § 1017-A.

- Mr. Titcomb contends the MDP qualified as a ballot question committee (§ 1052(2-A)), and therefore should have additionally registered and filed reports as a ballot question committee. §§ 1052-A(1)(A-1) & 1059(2).

After reviewing the statutes, my own opinion is that one can understand the logic of both positions. If the Commission finds it acceptable, the staff would like to postpone offering any recommendation about how the law should be applied until after the full facts are obtained through an investigation.

Grounds for investigating a possible violation of party committee disclosure requirements

Mr. Titcomb has raised a reasonable point that the MDP may have been required to file campaign finance reports as a state party committee 11 days before and 42 days after the November 4, 2025 election, which it did not. Generally, in an odd-numbered years, if PACs, party committees, and ballot question committees are receiving contributions or making expenditures to influence a ballot question, special election, or municipal election, they are required to file a campaign finance report 11 days before and 42 days after that election. That requirement for state party committees is listed in the following italicized text on the next page:

4-A. Filing schedule. A state party committee shall file its reports according to the following schedule. All reports required under [paragraphs A, B and C](#) must be filed by 11:59 p.m. on the day of the filing deadline.

§§§

A. A state party committee shall file quarterly reports:

- (1) On January 15th, which must be complete up to December 31st;
- (2) On April 10th, which must be complete up to March 31st;
- (3) On July 15th, which must be complete up to June 30th; and
- (4) On October 5th, which must be complete up to September 30th.

B. During any year in which primary and general elections are held, a state party committee shall file primary and general election reports in addition to the reports required under [paragraph A](#):

- (1) On the 11th day before the date on which the election is held, which must be complete up to the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held, which must be complete up to the 35th day after that date.

C. In an election year other than a year described in paragraph B, if a state party committee has received contributions or made expenditures for the purpose of influencing a ballot question election, a special election or a municipal candidate or referendum election subject to Title 30-A, section 2502, the committee shall file preelection and post-election reports:

(1) On the 11th day before the date on which the election is held, which must be complete up to the 14th day before that date; and

(2) On the 42nd day after the date on which the election is held, which must be complete up to the 35th day after that date.

§ 1017-A(4-A)(C). Mr. Titcomb is correct that the MDP did not file campaign finance reports 11 days before and 42 days after the November 4, 2025 election. It filed only quarterly reports. Consequently, the final campaign finance report filed by the MDP before the vote on Question 1 only covered activity through September 30, 2025, which seems insufficient for an organization that spent \$250,000 to oppose the question.

Also, after reviewing the MDP’s October and January quarterly reports, it may be reasonable to fault the MDP for not designating *any* of its expenditures as opposed to Question 1. The party committee reporting statute requires: “A party committee shall report “*all expenditures made to influence a campaign*, as defined in section 1052, subsection 1.” 21-A M.R.S.

§ 1017-A(2) (emphasis added). This implies that the state party committee must identify the campaign that was influenced by an expenditure. After reviewing the MDP’s October and January Quarterly reports, the Commission staff cannot find any expenditures that were designated as opposing Question 1.

This designation *was* possible in the eFiling system that the Commission retired on January 16, 2026. When a party committee entered an expenditure in that system, the party committee was prompted to indicate if the expenditure was to support or oppose a candidate or ballot question, and - if ballot question was selected – select the initiative or referendum from a drop-down list and state the party committee’s position (support or oppose). While the MDP may have had a reason for not making this designation, the Commission staff believes further investigation is necessary to verify whether its reporting was fully compliant. We agree with Mr. Titcomb’s overall point that a member of the public could read the MDP’s October and January quarterly reports and not discern how much it spent to oppose Question 1. Commission members may assess this by reviewing the October and January campaign finance reports. ETH 23-54.

Grounds for investigating a possible violation of ballot question committee disclosure requirements

Mr. Titcomb contends that the MDP qualified in 2025 as a ballot question committee with respect to Question 1 because it met the following definition:

"Ballot question committee" means a person that receives contributions or makes expenditures aggregating in excess of \$5,000 for the purpose of initiating or influencing a campaign, other than a campaign for the nomination or election of a candidate. The term "ballot question committee" does not include a political action committee or an exempt donor.

21-A M.R.S. § 1052(2-A). ETH. Commission staff believes Mr. Titcomb's argument should be taken seriously. The ballot question committee statutes¹ support his argument if they are read in isolation of the party committee reporting statute, 21-A M.R.S. § 1017-A. When the two sets of statutes are read together, however, the Commission staff has difficulty fully accepting Mr. Titcomb's argument. Why would the Legislature set up a duplicative reporting regime in which party committees would need to report their initiative-related financial transactions *both* in ballot question committee reports *and* party committee reports?

Conclusion

In summary, the Commission staff believes Mr. Titcomb's request shows sufficient grounds for believing a violation *may* have occurred. Accordingly, we recommend directing staff to conduct an investigation to understand the full extent of the MDP's financial and political activities to oppose Question 1 and to report back a recommendation by staff on whether the MDP violated either the ballot question committee or party committee disclosure requirements. If we can conduct the investigation expeditiously, our tentative plan would be to write up a staff memo addressed to the Commission providing the staff's recommendation by March 2-4. We would transmit the memo to the MDP and Mr. Titcomb at that time. The MDP would be encouraged to respond to the staff memo in writing by March 17. The staff memo, MDP response, and any comments by Mr. Titcomb would be included in the meeting packet for the Commission's consideration at its March 25, 2026 meeting. That is our proposal, but we are happy to follow any other direction the Commission would like.

¹ §§ 1052(2-A) (definition), 1052-A(1)(A-1) (registration), and 1059(2) & 1060 (campaign finance reporting)

November 19, 2025

Maine Commission on Governmental Ethics and Election Practices
45 Memorial Circle Augusta, ME 04330

Re: Formal Request for Investigation into Potential Violations of Maine Campaign Finance Laws by the Maine Democratic Party Related to the 2025 Ballot Question 1 Campaign

Dear Commissioners and Staff:

I am writing to formally request that the Commission open a comprehensive investigation into the Maine Democratic Party's activities to influence the outcome of Question 1 on the November 4, 2025, statewide ballot (the citizen-initiated measure concerning voter identification and absentee voting procedures). Publicly available information strongly suggests that the Maine Democratic Party received contributions and made expenditures exceeding \$5,000 for the purpose of opposing Question 1 but failed to register as a Ballot Question Committee (BQC) or file the required campaign finance reports, in apparent violation of 21-A M.R.S. § 1052-A and related provisions.

Under Maine law, any organization—including a state party committee—that receives contributions or makes expenditures exceeding \$5,000 to initiate or influence a statewide ballot question must register as a BQC within seven days of exceeding the threshold and file regular campaign finance reports, including quarterly reports, 11-day pre-election reports, and any required 24-hour reports. These reports must separately disclose all contributions received and expenditures made for ballot question advocacy.

Evidence from public sources indicates that the Maine Democratic Party far exceeded the \$5,000 threshold in its efforts to defeat Question 1, yet it appears to have reported these activities only (if at all) through its regular party committee filings rather than a dedicated BQC. Specific concerns include, but are not limited to, the following:

Contributions Received for the Purpose of Influencing Question 1

- Reports filed by DGA Maine (a registered BQC opposing Question 1) show multiple contributions to the Maine Democratic Party explicitly designated for opposing Question 1, including at least \$50,000 on August 5, 2025, \$20,000 on August 14, 2025 and \$80,000 during the period covered by the 11-day pre-election report. Additional contributions from DGA Maine and potentially other sources appear likely.
- These earmarked contributions triggered the obligation to register and report as a BQC upon exceeding \$5,000, yet no such registration or separate BQC filings are publicly visible.

Expenditures Made to Influence Question 1

- Public job postings on the Maine Democratic Party's website, social media (e.g., Facebook post dated September 19, 2025), and job boards advertised paid positions specifically to oppose Question 1. The Party's October quarterly party committee report shows a significant increase in payroll expenses (approximately seven additional individuals, totaling roughly \$30,000, excluding benefits or mileage), which appear directly attributable to these ballot-question-related hires.
- Campaign literature (palm cards, handouts) bearing the disclaimer "Paid for by the Maine Democratic Party" and explicitly advocating "No on Question 1" was widely distributed at door-knocking events beginning as early as August 2025 and continuing through October. Media reports and public photos document large-scale events involving thousands of such items, reasonably exceeding \$5,000 in printing and distribution costs alone (potentially including reported expenses of \$7,000 on August 18, 2025, and \$11,000 on September 9, 2025).
- Campaign apparel and buttons with explicit "No on 1" messaging were produced, distributed, and sold via the Party's online store (administered by Bright Blue Ink). Even if sales are treated as general contributions, bulk purchases and free distribution to staff/volunteers constitute reportable expenditures or in-kind contributions to ballot question advocacy.
- Social media graphics and phone-banking recruitment posts by the Maine Democratic Party promoted opposition to Question 1; the funding and staffing of these efforts require scrutiny for proper attribution and reporting.

Given the scale and visibility of these activities, the Maine Democratic Party's apparent failure to register a BQC or file separate ballot-question reports has deprived the public of critical transparency into the sources and uses of funds during a high-profile referendum.

I respectfully request that the Commission investigate these matters thoroughly, including but not limited to:

- Whether the Maine Democratic Party exceeded the \$5,000 threshold for BQC registration and, if so, the date on which the threshold was crossed;
- The full scope of contributions received and expenditures made to influence Question 1;
- Compliance with all required reporting deadlines (including any missed 11-day pre-election or 24-hour reports); and
- Appropriate penalties for each established violation, as provided by law.

Attachments referenced in this letter (job postings, photographs of literature and apparel, social media screenshots) are enclosed for your review. Additional documentation is available upon request.

Transparency in ballot question financing is essential to public confidence in Maine's electoral process. I appreciate the Commission's prompt attention to this matter and stand ready to provide any further information or assistance.

Thank you for your service to the people of Maine.

Sincerely,

A handwritten signature in black ink that reads "Alex Titcomb". The signature is written in a cursive, flowing style.

Alex Titcomb

Concerned Citizen of Maine

NO on QUESTION 1

PROTECT ABSENTEE VOTING

Protect Mainer's Right to Vote.

Join Mainer's in protecting absentee voting and stopping
the attack on rural, working, and senior voters by

VOTING NO ON QUESTION 1
on Tuesday, November 4th, 2025.

QUESTION 1 ASKS:

"Do you want to change Maine election laws to eliminate two days of absentee voting, prohibit requests for absentee ballots by phone or family members, end ongoing absentee voter status for seniors and people with disabilities, ban prepaid postage on absentee ballot return envelopes, limit the number of drop boxes, require voters to show certain photo ID before voting, and make other changes to our elections?"

Learn more, request your
absentee ballot, and take the
pledge to vote NO on Question 1.



Or visit mainedems.org/protectabsentee

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has been prepared and submitted by the candidate. The logo features the Maine
Democratic Party seal and the words "Democratic Party" and "Maine".



In 2024, 40% of Mainer's voted absentee.

Maine's absentee voting system is
secure, reliable, and widely popular.

If passed, Question 1 would dismantle the
Maine absentee voting system that we
know and rely on by:

- ✗ Banning prepaid return postage for
absentee ballots
- ✗ Preventing ballot requests by phone or for
a family member
- ✗ Ending ongoing absentee voter status for
seniors and voters with disabilities

Rural Mainer's, Mainer's with disabilities, our seniors,
and people who work multiple jobs - eligible voters
who are disproportionately more likely to cast
absentee ballots - will no longer be able to cast
their ballot by mail.

Join Mainer's in protecting absentee voting and stopping
the attack on rural, working, and senior voters by

VOTING NO ON QUESTION 1
on Tuesday, November 4th, 2025.

mainedems.org/protectabsentee

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MAINE DEMOCRATIC PARTY

PHONEBANK

**TO SAVE
ABSENTEE
VOTING**

Join a shift today!

Sat, Nov 1 — 6 PM

Sun, Nov 2 — 9 AM

Mon, Nov 3 — 12 PM

Tues, Nov 4 — 9, 12, 3, 6





Deputy Field Director

We are looking for a highly motivated, passionate, and talented Deputy Field Director to join our organizing team in Maine.

The Deputy Field Director is responsible for managing the Field Organizers on the Question 1 organizing program in Maine. They will lead the implementation of a variety of tactics to build capacity, develop leadership, and meet voters all Maine. They will collaborate with other field staff to identify challenges facing organizers and develop solutions to help staff grow and excel. They report to the Field Director and will work with them to implement and execute the program to defeat Question 1. At their core, the Deputy Field Director thrives when developing a culture and program structure that sets staff up for success.

About the Role

This is an opportunity to be on the front lines of one of the most important fights in Maine this year. The Deputy Field Director will be instrumental in defeating Question 1, a dangerous referendum that would make it harder for Mainers to vote. You'll be part of managing and motivating a hardworking, passionate team fighting for our democracy, working in the field across Maine. This job is ideal for someone with great people skills, managerial experience, a strong work ethic, and a passion for making a difference in Maine. This position reports to MDP's Field Director to start and is a full-time position through the second week of November 2025 with the opportunity to continue working at MDP if the circumstances allow.

Responsibilities

- Manage and train on an ongoing basis a team of field organizers to meet voter contact and capacity-building goals.
- Develop strategies and systems that lead your team to successfully meet daily and weekly organizing metrics, as well as maintain data integrity.
- Build and maintain political relationships with local MDP town and county leaders to increase buy-in and trust in the coordinated campaign at large.
- Ensure that all Field staff are trained on the technical aspects of the job, and coached on how to do their job better daily.
- Keep your team focused and motivated in a high-stress, rigorous work schedule and environment.
- Adhere to stated deadlines and maintain effective communication with MDP's

Field Director, Executive Director and other senior staff.

You'd be a good fit for this role if you have...

- At least one cycle of organizing experience and with some experience managing preferred.
- Strong commitment to Democratic values and enthusiasm for protecting voting rights and electing Democrats up and down the ballot.
- You love building team culture - setting structures, creating new traditions, and building team identity.
- You're eager to manage a diverse team with different experiences and perspectives, and committed to helping them grow and succeed.
- You are a relationship builder - you make friends everywhere you go and are ready to build successful meaningful relationships with your team and relationships in the communities you are organizing.
- You are goal-oriented and self-disciplined; able to meet tight deadlines and multitask.
- You thrive in fast-paced ever-changing environments and eat new priorities for breakfast.
- Ability to work long and irregular hours, including nights and weekends.
- You have access to reliable transportation, and are willing to travel frequently.

How to apply:

Please send your cover letter and resume to jbowie@mainedems.org with "Deputy Field Director" in the subject line. Applications will be accepted on a rolling basis. Relocation assistance is available if needed.

This is a full-time, temporary position through November 2025. Salary is dependent on experience and is in the \$60,000 range. This position includes a full benefits package and is part of the Maine Democratic Party's bargaining unit, represented by the International Brotherhood of Electrical Workers Local #1837.

These positions are based in Maine and require daily in-person voter contact, including knocking doors, making phone dials, and attending local democratic committees both in-person and virtually.

The Maine Democratic Party is an equal opportunity employer and it is our policy and our core value to recruit, hire, train, promote and administer any and all personnel actions without regard to sex, race, age, color, creed, national origin, religion, economic status, sexual orientation, veteran status, gender identity or expression, ethnic identity or physical disability, or any other legally protected basis.



Field Organizers

The Maine Democratic Party (MDP) is looking for Field Organizers to execute daily voter outreach to help defeat the voter suppression referendum that is on Maine's ballot this November. This includes knocking on doors, phonebanking and engaging community members about the stakes of the 2025 referendum. No prior political or campaign experience is required—we are especially interested in applicants with service industry, customer service, or community-based work backgrounds.

About the Role

This is an opportunity to be on the front lines of one of the most important fights in Maine this year. Field Organizers will be responsible for talking directly to voters every day—by phone and at the doors—to help defeat a dangerous referendum that would make it harder for Mainers to vote. You'll be part of a hardworking, passionate team fighting for our democracy, working in the field across your assigned region. This job is ideal for someone with great people skills, a strong work ethic, and a passion for making a difference in their community. This position reports to MDP's Field Director to start and is a full-time position through the second week of November 2025 with the opportunity to continue working at MDP if the circumstances allow.

Key Responsibilities

- Conduct daily direct voter contact through door-to-door canvassing and phone calls.
- Meet daily and weekly voter contact goals for conversations and data tracking.
- Represent the campaign in your community and serve as the face of our voter outreach program.
- Enter data promptly and accurately after each voter interaction in-line with the best practices established by the MDP's Field Director.
- Work closely with the Field Director and other organizers to share updates and collaborate on regional strategy.

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- Travel frequently within your assigned county and occasionally to nearby areas as needed.
- Assist with events, visibility, and GOTV efforts as the election approaches.

Qualifications

- Strong interpersonal skills and enthusiasm for talking with people.
- Ability to work independently and as part of a team.
- Commitment to the values of the Democratic Party and protecting voting rights.
- Willingness to work weekends when needed.
- Reliable transportation and willingness to travel daily within your assigned county or region.
- Previous campaign, organizing, or community experience is a plus, but not required.
- Experience in customer service, retail, food service, or other people-facing roles is highly valued.

How to Apply

Please send your cover letter and resume to exec@mainedems.org with “Field Organizer - <insert your county>” in the subject line. Applications will be accepted on a rolling basis. Relocation assistance is available if needed.

This is a full-time, temporary position through November 2025, paid at \$22/hour, with overtime eligibility. This position includes a full benefits package and is part of the Maine Democratic Party’s bargaining unit,

MEDEMS

MAINE DEMOCRATIC PARTY

represented by the International Brotherhood of Electrical Workers Local #1837.

These positions are based in Maine and require daily in-person voter contact, including knocking doors and attending local events in your assigned region.

The Maine Democratic Party is an equal opportunity employer and it is our policy and our core value to recruit, hire, train, promote and administer any and all personnel actions without regard to sex, race, age, color, creed, national origin, religion, economic status, sexual orientation, veteran status, gender identity or expression, ethnic identity or physical disability, or any other legally protected basis.



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

November 21, 2025

By Email

Susan Searle Sato, Treasurer
Maine Democratic State Committee
exec@mainedems.org

Dear Susan,

On November 19, 2025, the Maine Ethics Commission received a complaint from Alex Titcomb in which he alleges the Maine Democratic State Committee (the “committee”) received or spent more than \$5,000 to influence the campaign for Question 1 on the November 4, 2025 state ballot (“Question 1”) but did not register as a ballot question committee. Also on November 19th, I sent to you via e-mail a PDF copy of the complaint and the supporting documents submitted by Mr. Titcomb (complaint, together with supporting documents, the “complaint”).

In the complaint, Mr. Titcomb requests that the Commission investigate and then determine whether the committee should have registered and filed campaign finance reports as a ballot question committee.

Commission’s Consideration of the Complaint

The complaint is tentatively scheduled for a meeting of the Ethics Commission on January 28, 2025. At the meeting, the Commission is expected to decide whether to authorize the staff to conduct an investigation. Commission meetings are held in-person at the Commission’s office at 45 Memorial Circle in Augusta. When it is impractical for someone to participate in person, they may join the meeting by Zoom.

We request that you provide a written response to the complaint no later than December 19, 2025. In your response, please provide any information you believe the Commission should consider. The Commission staff suggests (1) addressing whether any contributions to the committee were earmarked for efforts to oppose Question 1 as alleged in the complaint, (2) describe any expenses incurred by the committee to oppose Question 1 as alleged in the complaint and provide some sense of the total amount of these expenses, and (3) if people were hired for the staff positions referred to in the complaint, identify who paid them.

Relevant Law

The Commission is required to review every request to investigate an alleged violation of campaign finance law and to conduct an “investigation if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred.” 21-A M.R.S.A. § 1003(2). For your reference, the statutes referred to in this letter are compiled in a separate PDF labeled “Applicable Law.”

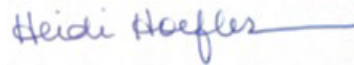
Maine Election Law defines “ballot question committee” as:

a person that receives contributions or makes expenditures aggregating in excess of \$5,000 for the purpose of initiating or influencing a campaign, other than a campaign for the nomination or election of a candidate

21-A M.R.S. § 1052(2-A). Ballot question committees are required to register with the Commission and report their financial activity to influence an initiative or referendum. 21-A M.R.S. §§ 1052-A and 1059. Some of the terms in the ballot question committee definition are defined in statute, such as “person,” “expenditure,” “initiate,” “influence,” and “campaign.” 21-A M.R.S. §§ 1001(3) and 1052(1), (4), (4-A) & (4-B).

Please email or call me if you have any questions. Thank you.

Sincerely,



Heidi Hoefler
Political Committee and Lobbyist
Registrar

cc: Mr. Alex Titcomb (by email)



**Bernstein, Shur,
Sawyer & Nelson, P.A.**
100 Middle Street
PO Box 9729
Portland, ME 04104-5029

T (207) 774 - 1200
F (207) 774 - 1127

Kate R. Knox
Shareholder
207-228-7229 direct
kknox@bernsteinshur.com

December 19, 2025

Via E-Mail

Heidi Hoefler
Political Committee and Lobbyist Registrar
Maine Commission on Governmental Ethics and Election Practices
135 State House Station
Augusta, Maine 04333-0135

Re: Alex Titcomb Complaint Against the Maine Democratic Party

Dear Ms. Hoefler,

We write on behalf of the Maine Democratic Party (MDP) in response to your questions dated November 21, 2025, regarding allegations made by Alex Titcomb about MDP's spending in opposition to Question 1. As an initial factual matter, we note that Mr. Titcomb was the campaign manager for the Yes on 1 campaign.

Before answering your three specific questions, we are providing some additional context and analysis which we hope will be helpful to your assessment.

1. MR. TITCOMB'S ALLEGATIONS

MDP understands that Mr. Titcomb alleges noncompliance with 21-A M.R.S. § 1052-A and related statutes. In his complaint, Mr. Titcomb alleges that MDP was required to register and file reports as a ballot question committee ("BQC") because MDP was active against Question 1.

The majority of Mr. Titcomb's complaints are centered on highlighting the specific spending by MDP which he argues triggers a BQC registration. As noted in his complaint, Mr. Titcomb obtained all his information easily and publicly, specifically from publicly filed campaign finance reports by both DGA Maine and MDP. MDP does not argue it spent less than

\$5,000 on Question 1 – the spending is clear by looking at regularly filed campaign finance reports, including those of DGA Maine BQC. MDP was not hiding its involvement or opposition to the question as voting rights are central to MDP's mission as articulated in their governing Platform.

Mr. Titcomb begins by stating: “Under Maine law, any organization – including a state party committee – that receives contributions or makes expenditures exceeding \$5,000 to initiate or influence a statewide ballot question must register as a BQC...”. MDP disagrees with that statement and argues that Mr. Titcomb is ignoring the Party Committee’s definition under 21-A M.R.S. 1017(A) which allows it to report all candidate and ballot question activities on its Party Committee reports. MDP does not question that ballot question activity must be reported, it simply believes it is accurately reporting that activity on its Party Committee reports.

1. PARTY COMMITTEES

The Maine Democratic Party is a “party” as defined by 21-A M.R.S. § 1. Party committees are unique entities under Maine election law and treated differently from Political Action Committees (“PACs”) and BQCs. Party Committees have specific carve outs from the definition of “contribution” and “expenditure” which acknowledge their unique status.¹ They also comply with reporting as outlined for them in statute.² As part of that reporting, MDP is required by statute to report all expenditures made to influence a campaign, which is further defined as any activity to influence both a candidate election or a ballot measure. 21-1 M.R.S § 1017-A (2). That statutory requirement is what guided MDP to include all its activity related to Question 1 in its regular party committee reports.

2. QUESTION 1

MDP was very engaged in efforts to defeat Question 1 and was reporting that activity in its regular reports. In late September, after an exchange between Commission staff and the Sagadahoc County Democratic Committee, we learned there may be differing views about how MDP should report its Question 1 activity. We reached out to Commission staff, shared our legal analysis, and asked for guidance. Among other things, staff’s response stated, “*I agree that the applicable statute does not require a party committee to separately establish a BQC for ballot question work.*” (See Attachment A).

As a result of that dialogue, MDP continued its activities and its reporting as disclosed to Commission staff in September of 2025.

Given all the above context, we respectfully argue that the questions below are not particularly relevant to the evaluation of Mr. Titcomb’s allegations, but we provide the answers as requested by Commission staff.

¹ 21 M.R.S. § 1012(2)(7-8-A) and 21 M.R.S. § 1012 (3)(7), (10a, 10b, 10c) and (10-A).

² 21 M.R.S. § 1017-A.

3. STAFF QUESTIONS – “ADDRESS WHETHER ANY CONTRIBUTIONS TO THE COMMITTEE WERE EARMARKED FOR EFFORTS TO OPPOSE QUESTION 1 AS ALLEGED IN THE COMPLAINT”

Yes. As publicly disclosed in the DGA BQC reports, four contributions were very clearly made for purpose of opposing Question One.

4. STAFF QUESTIONS – “DESCRIBE ANY EXPENSES INCURRED BY THE COMMITTEE TO OPPOSE QUESTION ONE AS ALLEGED IN THE COMPLAINT AND PROVIDE SOME SENSE OF THE TOTAL AMOUNT OF THESE EXPENSES”

MDP does not argue it made significant expenses to oppose Question One. That included the hiring of six to seven staff members, and an approximate total spend around \$250,000. Other expenses, as disclosed in filings, included literature, and digital advertising – all done with proper disclaimers of “Paid for by the Maine Democratic Party.”

5. STAFF QUESTIONS “IF PEOPLE WERE HIRED FOR THE STAFF POSITIONS REFERRED TO IN THE COMPLAINT, IDENTIFY WHO PAID THEM.”

Any staff hired for the staff positions referred to in the complaint were paid by the Maine Democratic Party and disclosed in their reports. At least one staff member continues their employment with MDP.

CONCLUSION

We appreciate this opportunity to address Mr. Titcomb’s complaint and to provide further context. Because we believe that MDP reasonably interpreted the statute, sought guidance from Commissions staff, and reported all activity on its regular committee reports, we do not believe Mr. Titcomb’s complaint requires further investigation, and we respectfully request no further action be taken.

Sincerely,

/s/ Kate Knox

/s/ Lisa Prosienski

Kate Knox
Lisa Prosienski
Counsel to the Maine Democratic Party

Kate Knox

From: Hoefler, Heidi <Heidi.Hoefler@maine.gov>
Sent: Friday, September 26, 2025 5:20 PM
To: Kate Knox
Cc: Lisa A. Prosienski
Subject: RE: Party Committees and Question 1

EXTERNAL EMAIL

Kate,

Although I did not see a question for me, perhaps a clarification and a bit of context may be useful.

The question I received from the Sagadahoc County Democratic Committee (SCDC) asked for direction about how the local party committee should proceed given a specific set of facts that included a local party committee thinking about producing public communications expressly advocating against a referendum question on the November ballot – would they need to think about registering as a ballot question committee? My response, part of which you copied and pasted below, provided information and potential considerations to help the SCDC think things through and make an informed decision. See wording highlighted in green below. There is no statement in the response I provided to the SCDC that the statute “requires party committees to establish a separate BQC for ballot work”. Again, see wording highlighted in green below – “Although a group is not required to register...you may want to consider registering”. I agree that the applicable statute does not require a party committee to separately establish a BQC for ballot question work. However, consistent with the applicable statute, that sentence I referred to above does include the following wording, “a group is not required to register as a ballot question committee until it raises OR spends more than \$5,000 to influence a ballot question campaign”. 21-A MRS §1052(2-A) defines “ballot question committee” as a “person” (defined in 21-A MRS §1001(3) as an individual, committee, firm, partnership, corporation, association, or organization) that receives contributions or makes expenditures aggregating in excess of \$5,000 for the purpose of initiating or influencing a campaign, other than a campaign for the nomination or election of a candidate. Per 21-A MRS §1052-A, if a person meets the definition of ballot question committee, then it must register as a ballot question committee unless there is an applicable exception to the registration requirements.

Heidi

Heidi Hoefler, Esq.
Political Committee & Lobbyist Registrar
Maine Ethics Commission
207.287.4709 (phone)

From: Kate Knox <kknnox@bernsteinshur.com>
Sent: Friday, September 26, 2025 12:49 PM
To: Hoefler, Heidi <Heidi.Hoefler@maine.gov>; Lisa A. Prosienski <lprosienski@bernsteinshur.com>
Subject: Party Committees and Question 1

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Heidi,

Happy Friday! Hope you are well.

Maine Democratic Party (who Lisa and I represent) reached out yesterday to ask for guidance around some correspondence you had with one of their county committees about their postcard expressing an opinion on Question 1. I cut and pasted what they forwarded below just for ease of reference:

Thanks for asking your questions below. As you know, party committees are established to “influence” (defined as promote, support, oppose, or defeat) candidate elections and ballot question committees are set up to influence state or local ballot question campaigns. We understand that a committee such as the Sagadahoc County Democratic Committee, which states that its mission is to elect Democrats, may occasionally use it funds for something other than its primary purpose. However, based on the information you provided below and in the party committee’s 2025 campaign finance report, the amounts that are being spent by the party committee on the ballot question campaign appear to somewhat substantial given the party committee’s reported cash on hand at the end of June. Although a group is not required to register as a ballot question committee until it raises OR spends more than \$5,000 to influence a ballot question campaign, if the party committee intends to continue to spend the money it raised to influence candidate elections to influence a ballot question campaign or the party committee receives contributions for or fundraises for the purpose advocating a no vote on Question 1, you may want to consider registering a ballot question committee even if you do not hit the \$5000+ registration threshold. Regardless, the party committee should keep track of all contributions received and expenditures made for the purpose of opposing the ballot question so it can timely register if the threshold is hit.

We are hoping to follow up with you about the advice above – as it doesn’t align with our reading of the statute. Our assessment of the law is that party committees are not required to separately establish BQCs for ballot question activity. Under 1017A, party committees are directed to report “all expenditures made to influence a campaign, as defined in 1052, subsection 1. That portion of the statute includes not just candidate campaigns, but both people’s veto’s and direct ballot initiatives. All of this information is contained in the “Reports of contributions and expenditures by party committees” section of the statute which leads to the logical conclusion that ALL activity (candidate and ballot related) are required to be disclosed on the party committee report itself. Just to be clear, all activity related to Question has been and will continue to be disclosed on the regular party committee reports – this is not a question of whether or not the activity is subject to reporting.

We don’t see anything in the statute that requires party committees to establish a separate BQC for ballot work. We disagree with your characterization that party committees are established to influence candidate elections and BQCs are established for ballot questions. Of course, PACs are established to primarily influence candidate elections, but state party committees are not PACs. They are their own political entity, with distinct provisions allowing them to coordinate with candidates (as opposed to PACs) and with distinct reporting forms and timelines.

We were also a bit lost about the “primary purpose” analysis above and how it related to the election law analysis. While very relevant to IRS law, we aren’t aware of how the primary purpose analysis of spending influences registration or reporting for BQCs.

As always, we are very open to feedback – including the possibility we are missing something. As of right now, party committees are doing work to influence Question 1 and are reporting it on their regular party committee reports. If you continue to believe a BQC is required, it would be great to meet and talk about why.

Again, thank you for taking the time to go through this – we always appreciate the staff’s engagement on these real time issues.

Best,

Kate

Kate Knox

she/her/hers pronouns

Shareholder

Legislative and Political Practice Group Leader

207 228-7229 direct

207 774-1200 main

207 233-3645 mobile

207 774-1127 fax

[My Bio](#) | [LinkedIn](#)

BERNSTEINSHUR

100 Middle Street PO Box 9729 [Portland, ME](#) 04104-5029 | [Manchester, NH](#) | [Augusta, ME](#) | [bernsteinshur.com](#)

Confidentiality notice: This message is intended only for the person to whom addressed in the text above and may contain privileged or confidential information. If you are not that person, any use of this message is prohibited. We request that you notify us by reply to this message, and then delete all copies of this message including any contained in your reply. Thank you.

December 26, 2025

Maine Commission on Governmental Ethics and Election Practices
45 Memorial Circle
Augusta, ME 04330

Re: Follow-Up to Formal Request for Investigation into Potential Violations of Maine Campaign Finance Laws by the Maine Democratic Party Related to the 2025 Ballot Question 1 Campaign

Dear Commissioners and Staff:

I write to follow up on my formal complaint dated November 19, 2025, and in response to the December 19, 2025 letter submitted on behalf of the Maine Democratic Party (MDP). I respectfully submit this additional correspondence to ensure that key factual and legal issues raised by MDP's response are not overlooked as the Commission determines whether a formal investigation is warranted in this matter of significant public importance.

1. Registration and Reporting Obligations Under Maine Law

I acknowledge that I am not an attorney and do not claim legal expertise comparable to counsel for the Maine Democratic Party. Nevertheless, I continue to maintain that the Maine Democratic Party—like any other “person” under Maine campaign finance law—was required to register as a ballot question committee upon exceeding the statutory threshold for contributions received or expenditures made to influence Question 1. I look forward to the Commission's determination on this threshold issue.

However, even assuming *arguendo* that the Commission were to credit MDP's position that party committees may report ballot-question activity solely through their regular party committee filings, Maine law still imposes specific disclosure requirements. Under 21-A M.R.S. § 1017-A(4-A)(C), activity undertaken to influence a ballot question must be clearly and properly reported. The Maine Democratic Party has not demonstrated that it made the required disclosures in compliance with this provision. On that basis alone, there is sufficient cause to warrant further investigation into whether MDP failed to meet its statutory reporting obligations.

2. Lack of Transparency and Unresolved Questions Regarding Funding and Expenditures

In its December 19 response, MDP asserts that its contributions and expenditures related to Question 1 are “easily and publicly” ascertainable. This claim is not supported by the public record.

In my original complaint, I raised specific concerns regarding approximately \$150,000 in contributions from DGA Maine to the Maine Democratic Party for the purpose of influencing Question 1. In their response, MDP for the first time discloses that it incurred “an approximate

total spend around \$250,000” opposing Question 1. This disclosure raises significant and unresolved questions, including but not limited to:

- Whether the \$150,000 from DGA Maine is included in this stated total;
- The source or sources of the remaining approximately \$100,000; and
- The specific nature and purpose of expenditures comprising this substantial sum.

None of this information is readily discernible from publicly available campaign finance reports. To my knowledge, no press coverage of Question 1 financing identified the Maine Democratic Party as raising or spending funds to influence the outcome of the ballot measure—precisely because MDP does not appear as a registered ballot question committee or as a reported spender in publicly accessible summaries.

This absence of clear, public disclosure undermines transparency and deprives voters of essential information regarding the sources and uses of funds in a statewide referendum. Such opacity is directly contrary to the purposes of Maine’s campaign finance laws and further supports the need for a thorough Commission investigation.

Conclusion

For the reasons outlined above, I respectfully submit that there remains ample basis for the Commission to open a formal investigation into the Maine Democratic Party’s activities related to the 2025 Ballot Question 1 campaign. Clarifying whether statutory thresholds were crossed, whether reporting obligations were properly met, and whether the public record accurately reflects the true scope of fundraising and spending is essential to maintaining public confidence in Maine’s electoral process.

Thank you for your service to the people of Maine and for your careful attention to this matter. I remain available to provide any additional information the Commission may find helpful.

Sincerely,

Alex Titcomb

Concerned Citizen of Maine



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

2025 CAMPAIGN FINANCE REPORT

FOR PARTY COMMITTEES

COMMITTEE		TREASURER	
MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME 04332 PHONE:(207) 622-6233 EMAIL: tgrant@mainedems.org		Ms. Susan Searle Sato PO Box 5258 Augusta, ME 04332-5258 PHONE:(107) 622-7432 EMAIL: exec@mainedems.org	
REPORT	DUE DATE	REPORTING PERIOD	
October Quarterly Report	10/06/2025	07/01/2025 - 09/30/2025	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$332,040.87	\$594,101.78
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$17.22
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$332,040.87	\$594,119.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$23,217.48
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$328,123.57	\$635,577.80
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$328,123.57	\$658,795.28
OTHER ACTIVITY		
9. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$11,816.00	\$18,880.00
10. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
11. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

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

REPORT FILED BY: Taylor Grant
 REPORT FILED ON: 10/6/2025 4:10:39 PM
 LAST MODIFIED: 10/8/2025 4:04:01 PM
 COMMITTEE ID: 763

SCHEDULE A CASH CONTRIBUTIONS

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

1 = Individual

9 = Candidate / Candidate Committee

2 = Candidate/ Spouse/ Domestic Partner

10 = General Treasury Transfer

3 = Commercial Source

11 = Transfer from Previous Campaign

4 = Nonprofit Organization

12 = Contributors giving \$50 or less

5 = Political Action Committee

13 = Contributors giving \$100 or less

6 = Political Party Committee

14 = Contributors giving \$200 or less

7 = Ballot Question Committee

15 = MCEA Payment

8 = Other Candidate/ Candidate Committee

16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
7/1/2025	Elizabeth Delucia-Harting 434 7th St Apt 4 Brooklyn, NY, 11215	Empowering Work Advisors Founder & Consultant	1	\$15,000.00
7/3/2025	House Democratic Campaign Committee PO Box 2021 Augusta, ME, 04338		6	\$50,000.00
7/7/2025	Justin L. Alford 134 Sheridan St Portland, ME, 04101	N/A Retired	1	\$15,000.00
7/14/2025	Margot Wallach Milliken 157 PINE ST PORTLAND, ME, 04102	N/A Not Employed	1	\$12,500.00
7/14/2025	Roger Milliken, Jr. 157 PINE ST PORTLAND, ME, 04102	Baskahegan Co. Executive	1	\$12,500.00
7/15/2025	Daniel Amory 63 Chadwick St Portland, ME, 04102	N/A Not Employed	1	\$5,000.00
7/27/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
7/28/2025	Bellows for Maine PO Box 151 August, ME, 04332		9	\$335.00
7/28/2025	Hannah Pingree for Gov. Exp. Committee 108 Banks Cove Rd North Haven, ME, 04853		9	\$585.00

7/28/2025	Senate Democratic Campaign Committee 22 Smith St Augusta, ME, 04330		5	\$255.00
7/31/2025	Angus For Governor 110 Marginal Way # 105 Portland, ME, 04101		9	\$250.00
8/5/2025	Democratic Governors' Association - Maine 1401 K ST NW STE 200 WASHINGTON, DC, 20005		5	\$50,000.00
8/5/2025	Maine Education Association 35 COMMUNITY DR AUGUSTA, ME, 04330		5	\$2,500.00
8/5/2025	Pingree for Congress PO BOX 17613 PORTLAND, ME, 04112		3	\$500.00
8/5/2025	Seacoast Management Company 30 Governors Way Topsham, ME, 04086-1680		3	\$5,000.00
8/12/2025	Carol A. Wishcamper 35 LITTLE RIVER LN FREEPORT, ME, 04032-6345	Carol Wishcamper Organizational Consulting Organizational Consultant	1	\$10,000.00
8/12/2025	Lyndel J. Wishcamper 35 LITTLE RIVER LN FREEPORT, ME, 04032-6345	The Wishcamper Companies Inc. Business	1	\$10,000.00
8/14/2025	Democratic Governors' Association - Maine 1401 K ST NW STE 200 WASHINGTON, DC, 20005		5	\$20,000.00
8/18/2025	House Democratic Campaign Committee PO Box 2021 Augusta, ME, 04338		6	\$60,000.00
8/18/2025	Senate Democratic Campaign Committee 22 Smith St Augusta, ME, 04330		5	\$25,000.00
8/24/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
9/7/2025	Mary Devlin 43 Beach Ln Damariscotta, ME, 04543	N/A Not Employed	1	\$250.00
9/7/2025	Maurice Cunningham 43 BEACH LANE DAMARISCOTTA, ME, 04543	N/A Not Employed	1	\$250.00

9/7/2025	Peggy Rotundo 446 College St Lewiston, ME, 04240	N/A Not Employed	1	\$250.00
9/8/2025	Maine State Building Trades Council PAC 21 Gabriel Dr Augusta, ME, 04330		3	\$1,000.00
9/14/2025	Anne Gallaudet 23 Coulthard Farms Rd Scarborough, ME, 04074	N/A Retired	1	\$300.00
9/14/2025	Bj McCollister 3 Orange St Portland, ME, 04102	Resurgam Group Consultant	1	\$250.00
9/14/2025	Cathy Bennigson 150 Gates Rd Jefferson, ME, 04348	N/A Not Employed	1	\$250.00
9/14/2025	Ina Indriani Demers 4 GORHAM RD WISCASSET, ME, 04578	Portland public schools Teacher	1	\$250.00
9/14/2025	Michael Brown Dowling 64 Goldenrod Ln North Yarmouth, ME, 04097	207 Pediatric Dentistry Pediatric Dentist	1	\$1,000.00
9/21/2025	Paul E. Peck 47 SWEETSER RD KINGFIELD, ME, 04947	Drummond & Drummond Attorney	1	\$250.00
9/21/2025	R. Chris Roark PO BOX 200 NEW HARBOR, ME, 04554	N/A Not Employed	1	\$250.00
9/28/2025	David Warren 53 McAuley Way Unit 304 Portland, ME, 04103	Verrill Dana LLP Attorney	1	\$500.00
9/28/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
9/30/2025	Contributors giving \$200 or less		14	\$2,240.87
9/30/2025	Kathryn T. Flannery 17 Steen Rd Arrowsic, ME, 04530	N/A Not Employed	1	\$250.00
9/30/2025	Sea Coast Management Company 20 Blueberry Ln Falmouth, ME, 04105-1856		3	\$30,000.00

9/30/2025	STEPHEN W MORIARTY 12 Oak St Cumberland Center, ME, 04021	General BusinessEMPLOYMENT INFO REQUESTED	1	\$250.00
TOTAL CASH CONTRIBUTIONS				\$332,040.87

**SCHEDULE A - 1
IN-KIND CONTRIBUTIONS**

- In-kind contributions are goods and services (including facilities) that a candidate received at no cost or at a cost less than the fair market value. they include all goods and services purchased for the campaign by the candidate or supporters if the campaign does not expect to reimburse the candidate or supporter. These contributions may come from the candidate, candidate's family, supporters, PACs, party committees, or other entities.
- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- In-kind contributions of \$50 or less can be added together and reported as a lump sum.
- If the candidate received a discount on goods and services, the amount of the discount must be reported as an in-kind contribution.
- Total contributions (cash and in-kind) from the same source (except the candidate and candidate's spouse or domestic partner) may NOT exceed \$350 in any election for the legislative candidates, \$750 for county candidates, or \$1500 for gubernatorial candidates. For party candidates, the primary and general elections are considered separate election. For non-party candidates, there is only one election, the general election.

- | | |
|--|--|
| 1 = Individual | 9 = Candidate / Candidate Committee |
| 2 = Candidate/ Spouse/ Domestic Partner | 10 = General Treasury Transfer |
| 3 = Commercial Source | 11 = Transfer from Previous Campaign |
| 4 = Nonprofit Organization | 12 = Contributors giving \$50 or less |
| 5 = Political Action Committee | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee | 15 = MCEA Payment |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution |

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	EMPLOYER AND OCCUPATION	DESCRIPTION (of goods, services, facilities, or discounts received)	TYPE	AMOUNT
8/25/2025	Paul Maritz 7231 W Mercer Way Mercer Island, WA, 98040	Retired Retired	Software	1	\$11,262.00
9/8/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$166.90
9/23/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data swap	7	\$387.10
TOTAL IN-KIND CONTRIBUTIONS					\$11,816.00

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
APP	Apparel (t-shirts, hats, embroidery, etc.)	CON	Contribution to party committee, non-profit, other candidate, etc.	
EQP	Equipment of \$50 or more (computer, tablet, phone, furniture, etc.)	EVT	Campaign and fundraising events (venue or booth rental, entertainment, supplies, etc.)	
FOD	Food for campaign events or volunteers, catering	HRD	Hardware and small tools (hammer, nails, lumber, paint, etc.)	
LIT	Printed campaign materials (palmcards, signs, stickers, flyers, etc.)	MHS	Mail house and direct mail (design, printing, mailing, and postage all included)	
NEW	Newspaper and print media ads only	OFF	Office supplies, rent, utilities, internet service, phone minutes and data	
ONL	Social media and online advertising only	OTH	Other and fees (bank, contribution, and money order fees, etc.)	
PER	Personnel and campaign staff, consulting, and independent contractor costs	PHO	Phones (phone banking, robocalls and texts)	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Professional services (graphic design, legal services, web design, etc.)	RAD	Radio ads, production costs	
TKT	Entrance cost to event (bean suppers, fairs, party events, etc.)	TRV	Travel (fuel, mileage, lodging, etc.)	
TVN	TV/cable ads, production, and media buyer costs only	WEB	Website and internet costs (website domain and registration, etc.)	
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
7/3/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$1,665.99
7/3/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$1,712.23
7/3/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$4,181.01
7/3/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.31
7/3/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.82
7/3/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
7/3/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,717.48
7/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$12.13
7/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
7/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$488.26

7/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,704.30
7/3/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
7/3/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.87
7/3/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
7/3/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,535.69
7/8/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$204.31
7/13/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.70
7/18/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$1,751.26
7/18/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$1,881.74
7/18/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$4,180.97
7/18/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.31
7/18/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.84
7/18/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
7/18/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,839.81
7/18/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
7/18/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,744.72
7/18/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15

7/18/2025	Sylvia De Boer 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$323.77
7/18/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.86
7/18/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
7/18/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,555.63
7/20/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.13
7/22/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$587.05
7/22/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$166.76
7/23/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$2,610.94
7/25/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$7,515.55
7/27/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.99
8/1/2025	Northeast Delta Dental PO Box 9566 Manchester, NH, 03108-9566	Dental Insurance	PER	\$1,018.16
8/1/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$239.56
8/5/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$2,503.35
8/5/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.31
8/5/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.83
8/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
8/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,839.80

8/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
8/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,703.80
8/5/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$252.58
8/5/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$161.66
8/5/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,021.93
8/5/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.14
8/5/2025	Sylvia De Boer 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$807.18
8/5/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.86
8/5/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
8/5/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$958.68
8/10/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.66
8/12/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$80.35
8/12/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$270.59
8/12/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$89.44
8/17/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$1.34
8/18/2025	Resonance Campaigns 1319 F St NW Ste # 301 Washington, DC, 20004	Printing Expenses	LIT	\$7,000.00

8/19/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$7,515.55
8/19/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$43.22
8/20/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$10,306.13
8/20/2025	Northeast Delta Dental PO Box 9566 Manchester, NH, 03108-9566	Dental Insurance	PER	\$596.90
8/20/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.30
8/20/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.82
8/20/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
8/20/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,839.81
8/20/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
8/20/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,879.66
8/20/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,463.54
8/20/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,188.23
8/20/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,021.94
8/20/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$638.72
8/20/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$141.45
8/20/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.16
8/20/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.87

8/20/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
8/20/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,535.18
8/24/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.99
8/26/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$288.50
8/26/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$18.22
8/28/2025	Amalgamated Bank 275 7TH AVE NEW YORK, NY, 10001	Bank Fees	OTH	\$16.00
8/29/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$852.00
8/31/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.20
9/3/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$230.39
9/3/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$56.54
9/3/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$13.18
9/3/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$157.27
9/5/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$12,688.93
9/5/2025	IBEW Local 1837 16 Old Winthrop Rd Manchester, ME, 04351	Union Dues	PER	\$783.79
9/5/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.32
9/5/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,205.64

9/5/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.84
9/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
9/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.64
9/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$50.00
9/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,703.81
9/5/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,673.38
9/5/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,410.52
9/5/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,103.18
9/5/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
9/5/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,210.80
9/5/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,688.38
9/5/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,440.65
9/5/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.14
9/5/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.87
9/5/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
9/5/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,382.30
9/7/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$53.34

9/9/2025	A1 Diner 3 Pearl Harbor Remembrance Brg Gardiner, ME, 04345	Meals	TRV	\$35.10
9/9/2025	Bagel Mainea 190 WESTERN AVE AUGUSTA, ME, 04330	Meals	TRV	\$36.16
9/9/2025	Bird & Co. 539 Deering Ave Portland, ME, 04103	Meals	TRV	\$38.59
9/9/2025	Darby's 155 HIGH ST BELFAST, ME, 04915	Meals	TRV	\$90.87
9/9/2025	Marshall Wharf Brewing Company 36 Marshall Wharf Belfast, ME, 04915	Meals	TRV	\$134.39
9/9/2025	Narrows Tavern 15 Friendship Rd Waldoboro, ME, 04572	Meals	TRV	\$64.53
9/9/2025	Pepino's Taco Stand 513 S Main St Brewer, ME, 04412	Meals	TRV	\$43.74
9/9/2025	Resonance Campaigns 1319 F St NW Ste # 301 Washington, DC, 20004	printing expense	LIT	\$11,000.00
9/9/2025	Taste Jamaica 190 State St Ellsworth, ME, 04605	Meals	TRV	\$85.28
9/9/2025	The River Tap & Grill 52 Golf Course Ln Hollis Center, ME, 04042	Meals	TRV	\$53.00
9/9/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$1,422.98
9/9/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$378.48
9/9/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$158.43
9/9/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$169.30
9/10/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$7,515.55
9/14/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$95.62
9/16/2025	Copy-It 483 Elm St # 101 Biddeford, ME, 04005	Printing Expenses	LIT	\$44.84

9/16/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$479.45
9/16/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$233.41
9/19/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$12,882.37
9/19/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.30
9/19/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,383.56
9/19/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.83
9/19/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.62
9/19/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
9/19/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$2,073.07
9/19/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,510.84
9/19/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,593.77
9/19/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,059.93

9/19/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
9/19/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,317.24
9/19/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,290.10
9/19/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,386.68
9/19/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
9/19/2025	Sylvia De Boer 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$556.80
9/19/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.86
9/19/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,539.40
9/21/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$48.41
9/22/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$250.26
9/22/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$274.97
9/26/2025	Amalgamated Bank 275 7TH AVE NEW YORK, NY, 10001	Bank Fees	OTH	\$48.00
9/28/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$24.69

9/29/2025	FTX Recovery Trust 2000 Center St Berkeley, CA, 94704	Bankruptcy Proceeding Settlement Payment	OTH	\$88,000.00
9/30/2025	Staples - Corporate 500 STAPLES DR FRAMINGHAM, MA, 01702	Office Supplies	OFF	\$93.70
9/30/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$13.63
9/30/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$99.17
9/30/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$120.45
9/30/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$35.29
9/30/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$63.03
9/30/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$97.83
9/30/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$225.65
TOTAL OPERATING EXPENDITURES				\$328,123.57



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

2026 CAMPAIGN FINANCE REPORT

FOR PARTY COMMITTEES

COMMITTEE		TREASURER	
MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME 04332 PHONE:(207) 622-6233 EMAIL: tgrant@mainedems.org		Ms. Susan Searle Sato PO Box 5258 Augusta, ME 04332-5258 PHONE:(107) 622-7432 EMAIL: exec@mainedems.org	
REPORT	DUE DATE	REPORTING PERIOD	
January Quarterly Report	01/15/2026	10/01/2025 - 12/31/2025	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$402,736.00	\$996,837.78
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$2,489.49	\$2,506.71
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$405,225.49	\$999,344.49
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$23,217.48
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$330,685.32	\$966,263.12
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$330,685.32	\$989,480.60
OTHER ACTIVITY		
9. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$17,025.10	\$35,905.10
10. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
11. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

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

REPORT FILED BY: Tara Gilligan
 REPORT FILED ON: 1/15/2026 11:01:48 AM
 LAST MODIFIED:
 COMMITTEE ID: 763

**SCHEDULE A
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- | | |
|--|---|
| <ul style="list-style-type: none"> 1 = Individual 2 = Candidate/ Spouse/ Domestic Partner 3 = Commercial Source 4 = Nonprofit Organization 5 = Political Action Committee 6 = Political Party Committee 7 = Ballot Question Committee 8 = Other Candidate/ Candidate Committee | <ul style="list-style-type: none"> 9 = Candidate / Candidate Committee 10 = General Treasury Transfer 11 = Transfer from Previous Campaign 12 = Contributors giving \$50 or less 13 = Contributors giving \$100 or less 14 = Contributors giving \$200 or less 15 = MCEA Payment 16 = Financial Institution |
|--|---|

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
10/3/2025	Democratic Governors' Association - Maine 1401 K ST NW STE 200 WASHINGTON, DC, 20005		5	\$80,000.00
10/3/2025	House Democratic Campaign Committee PO Box 2021 Augusta, ME, 04338		6	\$50,000.00
10/5/2025	William E. Little 1107 5TH AVE NEW YORK, NY, 10128-0145	N/A Not Employed	1	\$2,000.00
10/12/2025	Linda Ann Coleman 26 CUSHMAN ST PORTLAND, ME, 04102	N/A Not Employed	1	\$300.00
10/15/2025	Sea Coast Management Company 20 Blueberry Ln Falmouth, ME, 04105-1856		3	\$30,000.00
10/16/2025	Laura Gottsman 1348 CEDAR ST SAN CARLOS, CA, 94070	N/A Retired	1	\$10,000.00
10/18/2025	Adam D. Lee 10 Harris Rd Cumberland, ME, 04021-3726	Lee Auto Malls Automotive Industry	1	\$5,000.00
10/18/2025	Elizabeth Delucia-Harting 434 7th St Apt 4 Brooklyn, NY, 11215	Empowering Work Advisors Founder & Consultant	1	\$300.00
10/19/2025	Henry Lord 313 AUDUBON CT NEW HAVEN, CT, 06510	N/A Retired	1	\$500.00

10/19/2025	Joan Maxwell 3150 South St NW Apt 3F Washington, DC, 20007	N/A Not Employed	1	\$5,000.00
10/26/2025	Todd Webster 800 Maine Ave SW FI 7 Washington, DC, 20024	CGA Consultant	1	\$500.00
10/26/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
10/29/2025	Kathleen Burke 7 Summer Breeze Ln Kennebunkport, ME, 04046	General BusinessEMPLOYMENT INFO REQUESTED	1	\$500.00
10/29/2025	Nancy Zweng 26566 Carmelo St Carmel, CA, 93923	N/A Retired	1	\$10,000.00
10/29/2025	Senate Democratic Campaign Committee 22 Smith St Augusta, ME, 04330		5	\$40,000.00
11/2/2025	Angus King 25 Bay St Portland, ME, 04103	N/A Not Employed	1	\$1,500.00
11/19/2025	Mitchell Tardy Government Affairs 106 Sewall St Augusta, ME, 04330		3	\$1,000.00
11/23/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
12/2/2025	Blue Warriors 600 Pennsylvania Ave SE Unit 15180 Washington, DC, 20003		3	\$3,000.00
12/9/2025	Ullico Management Company, LLC 8403 Colesville Rd Silver Spring, MD, 20910		3	\$5,000.00
12/12/2025	House Democratic Campaign Committee PO Box 2021 Augusta, ME, 04338		6	\$75,000.00
12/15/2025	Daniel R Tishman 666 5th Ave FI 38 New York, NY, 10103	Tishman Realty & Construction Office and Administrative Occupations	1	\$10,000.00
12/15/2025	Iron Workers Local 7 PO Box 579 Clinton, ME, 04927		5	\$250.00
12/19/2025	Save Maine Absentee Voting Inc 411 Congress St Portland, ME, 04101		3	\$1,500.00

12/28/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
12/31/2025	Churchill Downs 600 N Hurstbourne Pkwy Ste 400 Louisville, KY, 40222		3	\$5,000.00
12/31/2025	Contributors giving \$200 or less		14	\$1,311.00
12/31/2025	Senate Democratic Campaign Committee 22 Smith St Augusta, ME, 04330		5	\$65,000.00
TOTAL CASH CONTRIBUTIONS				\$402,736.00

**SCHEDULE A - 1
IN-KIND CONTRIBUTIONS**

- In-kind contributions are goods and services (including facilities) that a candidate received at no cost or at a cost less than the fair market value. they include all goods and services purchased for the campaign by the candidate or supporters if the campaign does not expect to reimburse the candidate or supporter. These contributions may come from the candidate, candidate's family, supporters, PACs, party committees, or other entities.
- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- In-kind contributions of \$50 or less can be added together and reported as a lump sum.
- If the candidate received a discount on goods and services, the amount of the discount must be reported as an in-kind contribution.
- Total contributions (cash and in-kind) from the same source (except the candidate and candidate's spouse or domestic partner) may NOT exceed \$350 in any election for the legislative candidates, \$750 for county candidates, or \$1500 for gubernatorial candidates. For party candidates, the primary and general elections are considered separate election. For non-party candidates, there is only one election, the general election.

1 = Individual

2 = Candidate/ Spouse/ Domestic Partner

3 = Commercial Source

4 = Nonprofit Organization

5 = Political Action Committee

6 = Political Party Committee

7 = Ballot Question Committee

8 = Other Candidate/ Candidate Committee

9 = Candidate / Candidate Committee

10 = General Treasury Transfer

11 = Transfer from Previous Campaign

12 = Contributors giving \$50 or less

13 = Contributors giving \$100 or less

14 = Contributors giving \$200 or less

15 = MCEA Payment

16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	EMPLOYER AND OCCUPATION	DESCRIPTION (of goods, services, facilities, or discounts received)	TYPE	AMOUNT
10/2/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$383.10
10/14/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$406.30
10/23/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$218.00
10/28/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Video Production & Travel Expenses	7	\$15,185.20
10/30/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$221.60
11/1/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$76.20
11/2/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$22.00

11/3/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$18.70
11/8/2025	Planned Parenthood Maine Action Fund 443 CONGRESS ST PORTLAND, ME, 04101		Staff Expenses	5	\$494.00
TOTAL IN-KIND CONTRIBUTIONS					\$17,025.10

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
APP	Apparel (t-shirts, hats, embroidery, etc.)	CON	Contribution to party committee, non-profit, other candidate, etc.	
EQP	Equipment of \$50 or more (computer, tablet, phone, furniture, etc.)	EVT	Campaign and fundraising events (venue or booth rental, entertainment, supplies, etc.)	
FOD	Food for campaign events or volunteers, catering	HRD	Hardware and small tools (hammer, nails, lumber, paint, etc.)	
LIT	Printed campaign materials (palmcards, signs, stickers, flyers, etc.)	MHS	Mail house and direct mail (design, printing, mailing, and postage all included)	
NEW	Newspaper and print media ads only	OFF	Office supplies, rent, utilities, internet service, phone minutes and data	
ONL	Social media and online advertising only	OTH	Other and fees (bank, contribution, and money order fees, etc.)	
PER	Personnel and campaign staff, consulting, and independent contractor costs	PHO	Phones (phone banking, robocalls and texts)	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Professional services (graphic design, legal services, web design, etc.)	RAD	Radio ads, production costs	
TKT	Entrance cost to event (bean suppers, fairs, party events, etc.)	TRV	Travel (fuel, mileage, lodging, etc.)	
TVN	TV/cable ads, production, and media buyer costs only	WEB	Website and internet costs (website domain and registration, etc.)	
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/3/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$13,132.72
10/3/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.30
10/3/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,445.91
10/3/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.82
10/3/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.64
10/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,925.38
10/3/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,446.56
10/3/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,339.46
10/3/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,059.94
10/3/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,289.49

10/3/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,461.58
10/3/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,349.28
10/3/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,748.36
10/3/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
10/3/2025	Sylvia De Boer 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$602.02
10/3/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
10/5/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$83.94
10/8/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$225.34
10/8/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$328.61
10/8/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$14.92
10/8/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$271.50
10/8/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$79.29
10/9/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$11,922.53
10/9/2025	Northeast Delta Dental PO Box 9566 Manchester, NH, 03108-9566	Health Insurance	PER	\$797.38
10/9/2025	Northeast Delta Dental PO Box 9566 Manchester, NH, 03108-9566	Health Insurance	PER	\$797.38
10/12/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$2.78
10/15/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$278.43

10/15/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$141.48
10/15/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$255.86
10/15/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$100.49
10/19/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$217.45
10/20/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$13,126.96
10/20/2025	Resonance Campaigns 1319 F St NW Ste # 301 Washington, DC, 20004	Printing - Literature	LIT	\$15,750.00
10/20/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.32
10/20/2025	Anne Merkel 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$242.48
10/20/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,686.03
10/20/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.84
10/20/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.64
10/20/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,962.30
10/20/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,639.38
10/20/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,593.78
10/20/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,059.93
10/20/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,372.72

10/20/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,590.10
10/20/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,549.92
10/20/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.14
10/20/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
10/26/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$44.45
10/28/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$267.54
10/28/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$57.68
10/28/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$59.34
10/28/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$74.88
10/28/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$123.60
10/28/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$240.37
10/29/2025	Amalgamated Bank 275 7TH AVE NEW YORK, NY, 10001	Bank Fees	OTH	\$0.25
10/29/2025	Frame Media Strategies LLC 188 State St Ste 203 Portland, ME, 04101	Media Consulting	PRO	\$10,000.00
10/30/2025	Frame Media Strategies LLC 188 State St Ste 203 Portland, ME, 04101	Media Consulting	PRO	\$10,000.00
11/4/2025	Orange Bike Brewing Company 31 Diamond St Ste D Portland, ME, 04101	Event Venue & Refreshments	EVT	\$4,000.00
11/5/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$14,552.65

11/5/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$59.25
11/5/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.30
11/5/2025	Anne Merkel 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,936.67
11/5/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,727.84
11/5/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.83
11/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.63
11/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$2,302.82
11/5/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,485.60
11/5/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,688.89
11/5/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$3,001.67
11/5/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,248.39
11/5/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,786.29
11/5/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,632.12
11/5/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
11/5/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
11/7/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$130.96
11/7/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$236.56

11/7/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$358.13
11/7/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$435.24
11/7/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$18.46
11/7/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$22.01
11/7/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$120.27
11/7/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$272.63
11/7/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$366.59
11/7/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$101.41
11/7/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$106.00
11/9/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant fees	OTH	\$0.40
11/10/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$86.85
11/10/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$937.41
11/16/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.60
11/18/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$14,833.92
11/18/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$1,063.11
11/18/2025	Marc G. Malon, II 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$347.22

11/20/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$13,834.39
11/20/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.32
11/20/2025	Anne Merkel 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,721.44
11/20/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,940.35
11/20/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.82
11/20/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.64
11/20/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$2,686.94
11/20/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,320.31
11/20/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$3,001.69
11/20/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,475.80
11/20/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,781.85
11/20/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,632.11
11/20/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
11/20/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
11/23/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$1.79
11/26/2025	Amalgamated Bank 275 7TH AVE NEW YORK, NY, 10001	Bank Fees	OTH	\$48.50
12/3/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$8,566.89

12/3/2025	Northeast Delta Dental PO Box 9566 Manchester, NH, 03108-9566	Health Insurance	PER	\$847.50
12/3/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$670.40
12/3/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$581.28
12/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$313.38
12/3/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$79.42
12/5/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$10,776.36
12/5/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.30
12/5/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.84
12/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.63
12/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,999.22
12/5/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,059.93
12/5/2025	Megan Preambo 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,882.69
12/5/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,632.12
12/5/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
12/5/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
12/7/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.04
12/9/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$175.32

12/14/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.60
12/19/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$11,790.60
12/19/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.31
12/19/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$1,493.79
12/19/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.83
12/19/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.63
12/19/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,959.30
12/19/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,059.94
12/19/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,444.14
12/19/2025	Megan Preambo 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$3,163.35
12/19/2025	Samuel Purinton 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$681.73
12/19/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,632.11
12/19/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.14
12/19/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
12/28/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.99
12/30/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$832.54
TOTAL OPERATING EXPENDITURES				\$330,685.32