



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

To: Commission

From: Commission Staff

Date: May 23, 2023

Re: First Complaint by William Clardy - American Leadership Committee-Maine PAC

Summary

On January 24, 2023, the Ethics Commission received a complaint from Mr. William Clardy concerning the accuracy of campaign finance reporting by the American Leadership Committee-Maine PAC (“ALC”). ALC is a political action committee established in Maine by the Democratic Leadership Campaign Committee (“DLCC”), a Washington D.C. nonprofit dedicated to electing Democratic candidates to state office. DLCC provides all of ALC’s funding. In 2022, ALC arranged for mailings and digital ads in Maine promoting Democratic legislative candidates and opposing Republicans. DLCC paid vendors Moxie Media for mailings and Silversmith Strategies for digital ads. The expenses for these costs were contained in independent expenditure (IE) reports and ALC’s regular campaign finance reports.

As background, at meetings on October 26 and November 30, 2022, the Commission considered two compliance issues:

- ALC’s communications to voters through October 14, 2022 did not name its top three donors and instead stated “No top donors.” The Commission assessed a penalty of \$10,000 for this violation.
- The Commission exhaustively considered the purchasing and production of a campaign mailing voters began receiving on October 14, 2023. The Commission determined ALC agreed to pay for the mailing on Monday, October 10, 2022 (two days earlier than reported by ALC) and assessed a penalty of \$679.88 for filing the corresponding IE report two days late.

Mr. Clardy was one of the Republican candidates opposed in ALC’s communications. He commented at the Commission’s October 26, 2022 meeting.

In his January 24, 2023 complaint, Mr. Clardy

- contends ALC has failed to report internal staff time and legal expenses paid for by DLCC as either expenditures or in-kind contributions, and
- questions whether ALC reported the correct expenditure dates in its IE reports.

The Commission staff agrees with Mr. Clardy that ALC should have reported its legal fees, but recommends not taking action on the other issues in his January 24, 2023 complaint.

Relevant Laws and Rules (ETH 86-93)

Commission Initiation of 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).

Duty to File Campaign Finance Report 42 Days after an Election

During any year in which primary and general elections are held, PACs must report on the 42nd day after an election. 21-A M.R.S. § 1059(2)(B)(2).

Penalties for Late Campaign Finance Reports

A campaign finance report is not considered timely filed unless it substantially conforms to the disclosure requirements and is received the Commission by 11:59 p.m. on the deadline. 21-A M.R.S. § 1062-A(2). A report that is filed late is subject to penalties based upon the financial activity disclosed in the report, the number of days late, and the violation history of the PAC. § 1062-A(3).

Definition of Expenditure & Debts

The term “expenditure” includes “a purchase, payment, distribution, loan, advance, deposit or gift of money anything of value made for the purpose of initiating or influencing a campaign,” and “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.” 21-A M.R.S. §§ 1052(4)(A)(1)&(2). The Commission has adopted a rule (Chapter 1, § 7(3)) confirming that

receiving goods or services from a contractor/vendor constitutes a reportable expenditure, even if the goods or services have not been paid for:

3. Reporting Debts and Unpaid Obligations

- A. The following events constitute expenditures, even if the payment for a good or service has not been made at the time of the event:
 - (1) The placement of an order for a good or service;
 - (2) The signing of a contract for a good or service;
 - (3) The acceptance of the delivery of a good or the performance of a service by a vendor; or
 - (4) A promise or an agreement (including an implied one) that a payment will be made in exchange for a good or service.
- B. For reporting purposes, the expenditures listed in paragraph A are designated as debts or obligations prior to payment for the goods or services being made.
- C. If a person required to file a campaign finance report has a debt or obligation which remains unpaid at the end of the report period, the person shall report the date, amount, vendor, and purpose of the debt or obligation. If the exact amount is not known, the person filing the report shall report an estimate of the amount (preferably obtained in a written statement from the vendor).
- D. If a debt or obligation occurs in the same report period as a payment for that debt or obligation, the person filing the report will report only the payment, not the debt or obligation.
- E. A candidate or committee is not required to report a payment for a good or service in a 24-Hour Report, if the candidate or committee reported a debt for that good or service in the last regularly scheduled campaign finance report.

94-270 C.M.R. Ch. 1 § 7(3).

Definition of Contribution

The term “contribution” includes “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” and “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.” 21-A M.R.S. §§ 1052(3)(A)&(D). The Commission has adopted a rule (Chapter 1, § 6(4)) stating “the provision of any goods or services without charge or at a charge that is less than the usual and customary charge for such goods or services is an in-kind contribution.”

Complaint by Mr. Clardy (ETH 1-25)

Unreported In-Kind Contributions (ETH 1-2)

Legal services. In his January 24, 2023 complaint, Mr. Clardy argues ALC incurred legal expenses for services provided by the Elias Law Group in October - November 2022. He contends ALC should have reported these as in-kind contributions or as expenditures.

DLCC staff time. Mr. Clardy argues staff time by DLCC's IE director and other employees supervising vendors working on IE communications was an in-kind contribution that should have been reported.

Expenditure Dates in IE Reports (ETH 2-5)

Mr. Clardy alleges ALC still has not reported the correct expenditure dates in its IE reports. ALC's first IE report (for digital/social media advertising) contained an expenditure date of October 3, 2022. ETH 67-72. Mr. Clardy argues ALC must have committed itself to pay for IEs before October 3rd. He points to email correspondence between DLCC and Moxie Media dated September 23 and 28, 2022 as evidencing a commitment to pay for campaign literature. ETH-3. He also argues ALC must have made an obligation to pay for IEs before October 3, 2022 because the ads rely on professional actors and photography and some of the videos were apparently uploaded to YouTube on October 5-7, 2023. ETH 4-5, 13-25.

Response by ALC (ETH 29-34)

Unreported in-kind contributions.

Legal services. ALC explains it was billed by Elias Law Group for legal expenses on November 4 and December 12, 2022. These bills were paid by DLCC on January 20, 2022. The unpaid legal expenses were not originally included as unpaid debts and obligations in ALC's 42-Day Post-General campaign finance report. After consulting with Political Committee & Lobbyist Registrar Emma Burke, ALC amended the report to disclose the debts.

DLCC staff time. Moxie Media primarily provided the work of correcting the top donor disclosure statements within the scope of its current contract with ALC, with no additional cost included. The work of Moxie Media preparing IE communications was overseen by ALC's parent organization, DLCC. ALC argues it would be "administratively unworkable" to determine the time spent by DLCC staff on this particular project. DLCC's staff work on numerous projects across

dozens of states. This staff time is not tracked by state or project unless it increases DLCC's staff costs, which did not occur in this case.

Expenditure Dates in IE Reports

Regarding Mr. Clardy's contention that expenditure dates in IE reports are incorrect, ALC states it amended its IE reports to disclose dates as instructed after communicating with Ms. Burke for advice and assistance. ALC also contends Mr. Clardy's specific complaint about the dates on YouTube advertisements is irrelevant, as the videos he found were not published ads but videos uploaded prior to paid dissemination, as required by YouTube for content review. ETH 13-25.

Staff Analysis

Fees Paid to Elias Law Group

Elias Law Group sent invoices to ALC for its legal services on November 4, 2022 (\$29,346) and December 12, 2022 (\$26,308).

ALC should have disclosed these as an unpaid debts/obligations in its 42-Day Post-General report that ALC filed on December 20, 2022, which covered financial activity during October 26 - December 13, 2022. After a conversation between ALC's counsel and Political Committee and Lobbyist Registrar Emma Burke concerning Mr. Clardy's complaint, ALC amended the report on March 6, 2022 to disclose the two invoice amounts (\$29,346 and \$26,308) as unpaid debts and obligations. ETH-48 (Schedule D as originally filed) and ETH-61 (Schedule D as amended).

The Commission staff views the 42-Day Post-General report as late, because it did not substantially conform to the disclosure requirements. The proposed finding of violation and penalty are discussed in the final section of this memo.

Staff Time by DLCC Supervising Moxie Media and Silversmith Strategies

When reviewing the campaign finance reports of national organizations that have PACs in Maine, the Commission staff does *not* expect to see compensation the organization paid its employees to oversee outside vendors. For example, on October 27 and 28, 2022 the PACs registered in Maine for the Republican State Leadership Committee ("RSLC") and National Rifle Association Victory Fund ("NRA") filed 11-Day Pre-General Reports ETH 73-83. The reports disclosed fees paid to vendors for IE communications to influence legislative races in Maine. Similar to ALC, the reports did *not* disclose as in-kind contributions the value of RSLC's or NRA's

staff activities supervising those IE vendors. We do not view the regular 2022 PAC reports by ALC, RSLC, or NRA as incomplete because they do not contain this information.

In the view of the Commission staff, the information disclosed by ALC concerning its IE communications provided adequate detail for the public to understand who paid for the communications and their costs. Members of the public wanting to know who paid for the IE communications (mailings, digital ads, *etc.*) could clearly see *in* the communications they were “paid for” by the ALC. ALC reported its funding in its regular campaign finance reports. With regard to the costs of these communications, the amounts the PACs paid to the outside vendors are listed in ALC’s IE reports and regular PAC reports.

The Commission staff agrees with ALC it would be administratively difficult for some national organizations to keep track of staff time spent working with outside vendors on communications such as mailings, digital ads, or websites. ALC stated in its May 2, 2023 letter (responding to Mr. Clardy’s second complaint) DLCC keeps track of hundreds of legislative races across many states. According to ALC, the www.dlcc.org website includes content about 382 Democratic candidates in 38 states. A separate website dedicated to highlighting support for the January 6, 2022 “insurrection” mentions more than 1,000 candidates and legislators. In this context, it would potentially be a large amount of effort for each DLCC, RSLC, or NRA employee to allocate their time spent on mailings, digital ads and websites to specific candidates in specific states.

Maine Election Law contains numerous examples of campaign finance activity that is unitemized or not even reported because the activity is nominal and provides little additional information concerning who is spending what to influence elections. For example, candidates only need to itemize contributions over \$50. For party committees, the threshold is even higher at \$200. Express advocacy communications to voters do not need to be reported as IEs if they cost \$250 or less. Organizations can spend as much as \$2,500 to influence candidate elections without needing to register and file reports as a PAC. The Commission should consider: if a PAC hires a vendor for IE communications (mailings, digital ads, *etc.*) and reports those “hard costs,” how much additional information does the public learn if the PAC also discloses an estimated value of 15 or 30 minutes of staff time spent here or there working with the vendor spread out over a few weeks?

Candidates may not always appreciate the efforts of organizations like DLCC, RSLC, and NRA, but they engage in First Amendment-protected activity of aggregating contributions from

like-minded individuals and spending that money to promote candidates. We believe the current system of accounting for IEs in Maine is more than adequate to meet the informational needs of the Maine public. The Commission has not previously received a complaint like Mr. Clardy's arguing that this internal personnel information overseeing IE communications should be reported. The Commission staff intends to monitor this issue, but at this time does not see a need to amend or develop Maine law on this subject.

Expenditure Dates in IE Reports

With regard to mailings, the Commission staff regularly advises candidates and committees that communicating with vendors about design or graphics does not, in itself, trigger the reporting of an expenditure. In the case of PACs and party committees, it is not unusual for vendors to be prepare content that could be used in mailings that could support or oppose multiple candidates. Our consistent advice has been an IE report is triggered only when the committee has directs the vendor to print mailings supporting or opposing specific candidates.

Mr. Clardy refers to email correspondence dated September 23 and 26 between an employee of Moxie Media and DLCC concerning mockups or prototypes of mailings. ETH-3. Consistent with our staff advice to PACs and parties, we believe Moxie Media's initial presentation of creative visual work to ALC did not trigger IE reporting even if the emails communications firmly imply that some mailings would eventually take place.

With respect to DLCC, the staff finds it believable that ALC hired photographers or actors to create footage for generic ads before making final decisions on how that footage would be used. DLCC has stated it made committed to ads in specific districts on October 3, 2022. In the opinion of the Commission staff, Mr. Clardy has not provided sufficient evidence to doubt that October 3, 2022 date. Therefore, the staff recommends taking no further action on this issue.

Incomplete 42-Day Post-General Report

After counsel for ALC spoke with Political Committee & Lobbyist Registrar Emma Burke on March 6, 2023, ALC amended the 42-Day Post-General Report to include two unpaid debts for legal fees totaling \$55,654. This chart shows the total contributions, expenditures, and

unpaid debts/obligations in the ALC’s 42-Day Post-General Report as original filed (ETH 35-48) and as amended (ETH 49-62):

Originally Filed Version - 12/20/2022 ETH 35-48		Refiled Version - 03/06/2023 ETH 49-62		Change
Contributions	\$68,838.29	Contributions	\$68,838.29	\$0
Expenditures	\$63,551.64	Expenditures	\$63,551.64	\$0
Unpaid Debts	\$1,500.00	Unpaid Debts	\$57,154.00	\$55,654.00

Because the \$55,654 in unpaid legal fees was not reported in the original 42-Day Post-General Report, the Commission staff views the report as late because it did not substantially conform to the requirement to report expenditures (including unpaid debts). 21-A M.R.S. § 1062-A(2).

Using the formula in 21-A M.R.S. § 1062-A(3), the staff calculated the preliminary penalty for the late report as \$55,654. Under 21-A M.R.S. § 1062-A(4), because the amount of unreported activity exceeds \$50,000, the maximum penalty is the amount that was reported late (\$55,654):

Report	Deadline	Financial Activity	Penalty Rate	Days Late	Preliminary Penalty
42-Day Post-General Report	12/20/2022	\$55,654.00	4%	76	\$169,188.16 \$55,654.00 max

If the Commission finds that the report was late, the Commission staff recommends a partial waiver of the preliminary penalty because \$55,654 would be a disproportionately high penalty. Pursuant to 21-A M.R.S. § 1062-A(5), the Commission should provide ALC with an opportunity to request for a waiver of the \$55,654 preliminary penalty at the May 31 or June meeting.

Since 2018, when considering requests by PACs and ballot question committees for penalty waivers, the Commission staff has generally recommended penalties of at least \$750. The attached chart on pages ETH 84-85 shows the Commission’s penalty waiver decisions since 2018 for political committees and their major contributors. At this time (before any waiver request by the ALC), the Commission staff would view a reduction to \$2,000 to be appropriate, taking into consideration that the undisclosed debt was large and not corrected for 76 days, but the debt was an administrative expense unrelated to influencing elections and was required to be disclosed well after the election when there is less public attention to campaign finance reports.

William Clardy
13 Maple Street, Apt 1
Augusta, ME 04330
(207) 242-7248
January 24, 2023

Subject: Complaint against American Leadership Committee – Maine

Jonathan Wayne
Maine Commission on Governmental Ethics and Election Practices
135 SHS
Augusta, ME 04333

Mr. Wayne,

I am filing a complaint against American Leadership Committee – Maine (ALC – Maine) for violating Maine’s financial reporting requirements for political action committees.

Speaking as ALC – Maine’s legal representative at the Commission’s hearing on November 30, 2022, attorney Jonathan Berkon orally assured the Commission that he has worked with the Democratic Legislative Campaign Committee (DLCC) since 2010 and they take compliance “seriously.” Despite that assertion, ALC – Maine has continued to:

1. Systematically fail to report staff and legal expenses as either expenses, unpaid debts or as in-kind contributions, and
2. Neglect amending their financial reports to accurately correct misreported obligation/expense dates for their advertising campaigns, unless they completely omitted the production costs for those campaigns from their filed reports.

Unreported staff and legal expenses

As of their quarterly filing on January 19, 2023, ALC – Maine has filed 16 reports with the Commission, and amended many (if not most) of them since the Commission’s hearing on October 26, 2022. All 16 of those reports were filed (and certified as accurate) by Heather Kashner, the DLCC’s Chief Operating Officer, and list Meghan Lyons as ALC – Maine’s treasurer. None of those reports include any accounting for personnel or legal expenses.

The entirety of ALC – Maine’s reported operating expenses are:

- \$56,400.00 for professional polling (reported as a POL expense type in their October 2022 quarterly filing)

- \$2,041.24 for a total of 52½ hours of phone banking (reported as in-kind contributions in the 11-day Pre-General Report)
- \$20,926.99 in production costs for canceled mailers (reported as MHS expense types in the 42-day Post-General Report)
- \$750 in production costs for a canceled mailer (reported as a MHS expense type in the January 2023 quarterly filing).

In their January 2023 quarterly report, ALC – Maine appears to have balanced their books with no outstanding debts and no cash on hand. Nowhere in ALC – Maine’s filings are any reports of payment of staff costs, in-kind contributions of staff time, legal expenses, or payment of those legal expenses as in-kind contributions.

At the hearing on November 30th, Mr. Berkon also clearly told the Commission, “In addition to the penalty itself, we incurred, as we said, \$22,000 in sunk cost/expenses and, plus, countless hours – man-hours, woman-hours – of our staff in order to get the disclaimer right, and from our consultants as well, um, obviously in addition to any legal expenses.”¹ That sounds like some significant expenses, even before the Commission levied a \$10,000 penalty – which also does not appear in any filings as either a paid expense or even as an unpaid debt.

If ALC – Maine paid for those staff hours and paid legal fees charged by the Elias Law Group (Mr. Berkon’s employer), how much did they spend? When did they get that money from the DLCC? Every dime that they’ve reported receiving has already been spent paying other expenses.

Further, in his sworn declaration dated November 16, 2022, Cory Warfield identified himself as the Independent Expenditures Director for the DLCC, and further declared that he oversaw the expenditures of ALC – Maine in his capacity as DLCC’s Independent Expenditures Director.² Judging by the DLCC’s current career listings on their website, Mr. Warfield’s position is clearly not an unpaid volunteer position. I do not see any accounting for the contribution of Mr. Warfield’s professional services in ALC – Maine’s filings.

ALC – Maine seems to have a very clear pattern of not reporting their operating expenses, along with a habit of not reporting in-kind contributions which supported their campaign in Maine. That seems as least as egregious as their shenanigans with attempting to evade the top-3 donor requirement.

Production costs not reported accurately

Even after amending many of their reports to allegedly correct the dates they reported for making expense obligations, ALC – Maine’s current filings do not report the real dates that they committed spending money on their advertising campaigns.

¹ Maine Ethics Commission, **Commission Meeting - November 30, 2022**, at the 1:01:01 mark; <https://youtu.be/UjSYK0hM1Dw?t=3661>

² Maine Ethics Commission, **November 30, 2022 Commission Meeting**, Complaint – American Leadership Committee-Maine PAC, pp. ETH:38-39

The 2-day independent-expenditure reporting period for the 2022 general election ran from September 9 to October 25. ALC – Maine’s first independent-expenditure report is filed for a period from October 3 to October 5. This means that ALC – Maine is implicitly claiming they made no obligation to fund any advertising campaigns before October 3.

Among the materials submitted by ALC – Maine to demonstrate their timeliness in complying with the Commission's decision on the top-3 funder disclaimers is a partially redacted email³ forwarded by Ashley Quenneville to Emily Hugin (who appeared before the commission as Mr. Berkon’s co-counsel representing ALC – Maine). That email includes an unredacted email exchange which started with an email sent from Eli Pressberg to Ms. Quenneville on September 23, 2022, at 12:06 p.m. (emphasis in original):

Hi Ashley,
Let me know who else I should be adding to these threads moving forward.
We're excited to share the creative for the first flight of mail with you. This piece is an 8.5x11 card with a common front and unique backs. This piece is meant to make clear the urgency of the threat to abortion rights in Maine, and the importance of the State House race specifically.
Please view at 100% magnification for most accurate colors, and note that images may appear fuzzy for now to keep the file size small.
All versions of this piece are scheduled to be finalized for print by Wednesday, 10/5 in order to drop to USPS on 10/12. Once we have approval on the initial design, we will build out a unique version for each race for research and legal review. **Please share compiled initial feedback in one email to us by EoD Monday, 9/26 to stay on track.**
Really looking forward to your thoughts.

Clearly, ALC – Maine had made some commitment early enough that one of their vendors was submitting creative materials for approval by the end of the day on September 26 “to stay on track.” That email alone discredits ALC – Maine’s stubborn claim that the earliest they committed to any expenditure for the production of mailing material was October 3.

Any remaining benefit of the doubt is shattered by Ms. Quenneville’s reply, sent on September 28 at 10:15 a.m.:

Hi Eli,
This looks great! A couple edits:
-Can we remove some of the “extreme” language? Remove from “extreme Republican John Chambers” and “keep extremists like John Chambers out of our state legislature”
-Can we add “even here in Maine” to the first paragraph on the back?
Still waiting on legal edits which I should have today, once I have them I’ll send them through.
Thanks,
Ashley

³ Maine Ethics Commission, **November 30, 2022 Commission Meeting**, Complaint – American Leadership Committee-Maine PAC, pp. ETH:102-103

This makes it undeniable that the design and layout of ALC – Maine’s “Mail Piece #1” was well underway – far enough to merit legal review – more than a week before their first reported obligations on October 3. The Commission will have to decide how egregious ALC – Maine’s dishonesty has been on the mailing production dates.

ALC – Maine also failed to correct their reported production-decision dates for their first digital advertising campaigns. In their disclaimer-compliance matrix for their digital advertising⁴, ALC – Maine lists 3 ad buys (\$8,750.00, \$116,250, and \$29,950.65) for ME Digital Ad Piece 1 and 2, with an Original Drop Date of October 3. That clearly indicates that the digital advertising was scheduled to drop on October 3, which would mean that the advertising pieces had been (or were scheduled to be) produced and ready by then. I briefly explained this discrepancy during my oral testimony at the Commission’s hearing on November 30th.⁵

At least partially corroborating this, the American Leadership Committee, the “independent expenditure arm” of the DLCC and ALC – Maine’s national organization, currently maintains a YouTube channel⁶ which currently has 47 published videos featuring Maine legislative candidates in the November election. The “Access” videos are identical except for the text identifying the Republican candidate voters are asked to oppose, while the “Generations” videos are more individualized with the Democratic candidate named both in on-screen text and in the audio track. Also, the Access videos feature the updated Top-3 disclaimer, while the Generations videos still feature ALC – Maine’s original disclaimer (when viewed on January 20, 2023).

Opposition Video	Uploaded	Support Video	Uploaded
Access 09 JohnChambers	Oct. 30		
Access 20 Jennifer Morin	Oct. 30		
Access 37 Reagan Paul	Oct. 30	Generations 37 Maggie English Flanagan v2	Oct. 7
Access 44 CrystalLynnRobinson	Oct. 27	Generations 44 BillPluecker	Oct. 7
Access 48 Tricia Warren	Oct. 27	Generations 48 HollyStover	Oct. 7
Access 49 Kelly James	Oct. 27	Generations_49_Allison Hepler	Oct. 7
Access 51 Linda Baker	Oct. 27	Generations 51 Becky Jauch	Oct. 6
Access 54 Charles Bussell	Oct. 27	Generations 54 Karen Montell	Oct. 6
Access 55 Phillip Wiseman	Oct. 27	Generations 55 Dan Shagoury	Oct. 6
Access 57 Corey Wilson	Oct. 27	Generations 57 Tavis Hasenfus	Oct. 6
Access 59 James Orr	Oct. 29	Generations 59 Raegan LaRochelle v3	Oct. 6
Access 60 William Clardy	Oct. 29	Generations 60 Bill Bridgeo	Oct. 6
Access 75 Tiffany Eastbrook	Oct. 29	Generations 75 Scott Landry	Oct. 6
Access 83 Donna Dodge	Oct. 29	Generations 83 Walter Riseman	Oct. 6

⁴ Maine Ethics Commission, **November 30, 2022 Commission Meeting**, Complaint – American Leadership Committee-Maine PAC, pp. ETH:69-78

⁵ Maine Ethics Commission, **Commission Meeting - November 30, 2022**, at the 0:50:15 mark; <https://youtu.be/UjSYK0hM1Dw?t=3015>

⁶ [@americanleadershipcommitte4315](https://www.youtube.com/@americanleadershipcommitte4315), **American Leadership Committee**; <https://www.youtube.com/@americanleadershipcommitte4315/videos>

Opposition Video	Uploaded	Support Video	Uploaded
Access 86 Greg Foster	Oct. 29	Generations 86 Jess Fay	Oct. 6
Access 88 James Sorcek	Oct. 29	Generations 88 Kathy Shaw	Oct. 6
Access 89 Benjamin Weisner	Oct. 29	Generations 89 AdamLee	Oct. 5
Access 96 Jon Connor	Oct. 29	Generations 96 Mike Lajoie	Oct. 5
Access 105 David Reed	Oct. 29	Generations 105 Annie Graham	Oct. 5
Access 106 Barbara Bagshaw	Oct. 29	Generations 106 Dana Reed	Oct. 5
Access 107 Michael Hall	Oct. 30	Generations 107 Jane Pringle	Oct. 5
Access 142 Pamela Buck	Oct. 30	Generations 142 Anne Marie Mastraccio	Oct. 5
Access 143 Ann Marie Fredericks	Oct. 30	Generations 143 WesDavie	Oct. 5
Access 145 Tim Roche	Oct. 30	Generations 145 Dan Hobbs	Oct. 5
Access 149 Mark Rouillard	Oct. 30		

If ALC – Maine is to be believed, their vendors were able to write scripts, select several filming locations, hire (or invite) 2 actors, camera and microphone operators, director(s), and producer(s), get through production and final editing for at least 22 full-color 15-second videos featuring 8 transitions between 9 distinct segments and separate voiceovers for each video, and start uploading them to YouTube within 2 days of ALC – Maine committing to making the videos. That’s before even considering when the 25 original Access videos (with the incorrect disclaimer) were produced, or why a couple of the videos had “v2” or “v3” appended to their names (suggesting second or third versions being uploaded).

If ALC – Maine chooses to revise the dates they claim those initial spending obligations were made, I think it would be prudent to require them to provide some objective documentation corroborating those revised dates.

Conclusion

In my oral testimony, I said that for educational penalties to be effective, they must be big enough to get the violator(s) attention, and the intended lesson(s) needed to be applied. After allowing the DLCC ample time to apply the Commission’s intended lesson to their ALC – Maine reports, they failed to apply it to errors which were pointed out and they failed to correct even more egregious errors which weren’t called out back in November.

It appears clear that they need another, bigger, motivation to learn that they really do need to obey Maine’s laws whenever they participate in Maine politics.

Sincerely,

William Clardy



Independent Expenditure (IE) Director

WASHINGTON, DC / INDEPENDENT EXPENDITURE DEPARTMENT / FULL TIME
/ HYBRID

Democratic Legislative Campaign Committee

The Democratic Legislative Campaign Committee (DLCC) is the sole organization dedicated to electing Democrats to statehouses. Since 2016, the DLCC and state partners have built eight new majorities and flipped seats from red to blue across the country – paving the way for progress. State legislatures pass the policies that most affect Americans' day-to-day lives, and flipping chambers from red to blue has an outsized impact on governing and public policy.

Taking back power starts at the local level. The DLCC recruits, trains, and supports local Democrats running for their state legislatures. We provide our candidates with the resources, field support, and data necessary to run smart, winning campaigns. By gaining a foothold in state legislatures, Democrats can engage supporters across the country and prepare for victories in statewide and national elections.

We're powered by more than 200,000 supporters from all 50 states. Over 98% of our contributions come from grassroots donors (giving an average of \$29), who fuel thousands of local Democratic candidates across the country.

Building up Democratic majorities in the states is more important than ever. With right-wing radicals proliferating state legislatures across the country and redistricting happening this year, our democracy is on the line. We're counting on our supporters to get educated, involved, and take action in their communities.

The DLCC compensates employees competitively and provides a very generous benefits package. We believe in work-life balance and understand that every employee has unique circumstances at home. We offer employees significant amounts of time off as well as flexible work options. We're dedicated to treating one another with respect in the workplace and prioritize racial equity and inclusion (REI) in our work with one another as well as with our stakeholders.

Independent Expenditure Director

The Independent Expenditure Director owns all aspects of the DLCC's independent spending efforts, collaborates with state and Washington-based national partners interested in winning or defending state legislative majorities through independent spending, and serves as a proactive advocate for the organization and its work with targeted public audiences.

The Independent Expenditure Director also manages programming for the 501c4 organization affiliated with the DLCC, State Democracy Action Fund. This includes social welfare and accountability programming, in collaboration with the 501c4's Interim Executive Director.

The Independent Expenditure Director reports to the Vice President of Political and Strategic Initiatives. The DLCC is located in Washington, DC, and our office has taken on a hybrid model for staff effective January 2022. The role requires the employee to be in DC regularly for meetings with stakeholders, and as a result, our preference is that the employee is located in DC, but we will consider a remote employee as well.

The Independent Expenditure Director is expected to model the values of the DLCC:

- **CREDIBILITY:** We are respected and trusted in words and actions.
- **INCLUSIVE:** The DLCC values the unique experience and perspective of all who work here. We strive to make all contributors feel welcomed, valued, and respected. We focus on outcomes, recognizing different people approach opportunities and challenges differently.
- **INITIATIVE:** We exhibit high levels of creativity in our work and need all team members to proactively contribute ideas to move our work forward.
- **RESULTS DRIVEN:** Our team undertakes projects professionally and executes them fully and to completion.

- **RISK:** We identify opportunities to employ new ideas and tactics, and execute these ideas when we believe the potential reward outweighs the risk. We evaluate, learn, and improve our strategy, both when the risks pay off and when they do not.
- **TEAMWORK:** We work collaboratively, additively, and in sync with our colleagues. Our individual work considers the needs, capacity, and expertise of those we work alongside.

Responsibilities

Independent Expenditure and Accountability Strategy and Management

- Develop and align the IE strategy with the DLCC's overall political and organizational strategy and establish the IE interests, as permitted by law, with various audiences including staff and donors.
- Collaborate, as permitted by law, with internal and external partners to ensure there is a shared understanding of the best paths to victory in target states and position the DLCC as a strategic leader in the national IE space.
- Understand and abide by firewall policies on a state-by-state basis.
- Manage and analyze data and political intelligence to identify targets.
- Manage IE staff and consultant teams. Collect and disseminate, as permitted by law, political information and intelligence throughout the election cycle.
- Create and align IE and accountability fundraising strategy in collaboration with Vice President of Finance and maintain accurate, actionable knowledge of state campaign finance laws and DLCC fundraising and expenditure options.
- Implement a strategic budget, in collaboration with Vice President of Political and Strategic Initiatives, to win chambers, ensure all IE spending is aligned and not duplicative of other in-state or national efforts, and operate programs within the approved budget.
- Work with operations, legal, and consultant teams to ensure communications are factually accurate and meet all legal requirements, including payment and filing deadlines.

Relationship & Partner Management

- Establish priorities and practices for maintaining strong, mutually beneficial relationships with current and prospective partners and allies, and drive partner priorities and ensure information needs are met through timely updates on DLCC's IE plan and priorities.
- Conduct or facilitate partner/ally meetings and call time to inform partners about evolving legislative IE landscape.

- Shape targeted in-state tables to operate with best practices. Represent the DLCC at national and in-state tables and with key targeted audiences.
- Track allied group IE engagement in state-based political and accountability work.
- Support alignment of progressive groups, allies, and legislators around state legislative IE priorities and programs.

Team Management:

- Supervised employees: IE Regional Political Director(s) and IE Political Coordinator. We anticipate hiring these roles in Q4 2023 for the 2024 elections.
- Regularly attend training and pursue continued education in supervision skills.
- Uphold DLCC expectations for supervisors.
- Act with integrity and awareness of one's power as a leader.
- Maintain a harassment-free and inclusive workplace for team members.
- Cultivate and guide the professional growth of the team by establishing and maintaining thoughtful opportunities to learn, grow, and receive constructive feedback.

Expected Outcomes

- The DLCC has a set of national and in-state legislative IE table best practices.
- The DLCC has increased influence with national IE partners.
- The DLCC has increased access to donors who typically engage on the independent side.
- The DLCC and its IE program work is recognized as influential and innovative.
- Staff perform to high standard, continuously improve, and have high levels of satisfaction.
- Direct reports are efficiently managed and well mentored in career.

Qualifications

- Minimum of 6 years of political experience, including but not limited to: managing political campaigns, developing political strategy, leading progressive organization engagement in political activity, fundraising to support program, and engaging in collaborating with other organizations to effect political change.
- Experience with state legislative politics is preferred but not required and sharing our commitment to electing state legislative Democrats is required.
- Knowledgeable about institutions and groups engaged in state legislative politics is highly desirable.
- Authentic relationship builder able to build trust and deliver on mutually beneficial outcomes.

- Clear and persuasive communicator, able to distill challenging topics and engage attention and move people to action.
- Strong collaborator capable of getting the best results with a senior team of research, data, operations, legal, and political peers.
- Thoughtful, innovative political strategist able to learn quickly, challenge one's own and other's thinking to get the best results.
- Experience managing both staff and consultants.

Physical Requirements

The DLCC is committed to supporting employees of varying abilities and to providing reasonable accommodations to enable individuals with disabilities to thrive at the DLCC.

The requirements of this role, related to its physical demands, described here are representative of those that must be met by an employee to successfully perform the essential functions of this job.

All DLCC employees must be able to operate a computer and use a cell phone. For roles at the DLCC that include frequent business travel expectations, we can discuss reasonable alternatives to travel in some instances. Most roles also require communicating with key external stakeholders of the organization in person, via the telephone, or via email. Applicants with questions about accommodations may request to speak with our ADA liaison, John Skic.

Essential functions of the role include:

- While performing the duties of this job, the employee is frequently required to communicate using the telephone, email, and in person with stakeholders.
- Specific vision requirements for this job include editorial review of digital and designed work products as well as data analytics in various proprietary software platforms.
- This position will require the employee to frequently travel across the country to meet with stakeholders as well as attend meetings and conferences offsite.

How to Apply

The salary for the Independent Expenditure Director is \$150,000 - \$170,000 on an annualized basis, commensurate with experience and qualifications. The DLCC offers a generous benefits package, including:

- More than 25 days of paid time off, including for Federal holidays, time off around Federal holidays, including the week between Christmas and New Years, vacation, sick, and personal days.
- Fully paid health/vision/dental insurance for the employee + spouse/partner + dependents.
- Up to 6% retirement employer contribution.
- Employer contribution of \$500 to employee's Flexible Spending Account and opportunity to withhold pre-tax income for Dependent Care Account.
- Up to \$5,000 employer-paid Health Reimbursement Account for IVF-related costs or Adoption Assistance, and up to \$2,500 for employer-paid Health Reimbursement Account for out-of-pocket dental and orthodontic expenses. Up to \$2,500 in reimbursement for travel costs to access medical care.
- Monthly \$100 student loan payment benefit.
- Monthly \$100 mobile phone reimbursement.
- and more.

To apply for this position, please complete an electronic application by February 3, 2023. The DLCC may review applications after this deadline in limited circumstances, but this is not a guarantee that your application will be considered if it is not submitted by February 3, 2023. Only complete applications through the application portal will be accepted. You must also include a resume, cover letter, and three professional references to be considered for this position. When an applicant with a disability needs accommodation to have an equal opportunity to compete for this position, they may request it in writing by emailing jobs@dlcc.org. No calls, please. Applicants will be screened on a rolling basis.

The DLCC is committed to an inclusive and equitable environment and diversity among its staff and recognizes that its continued success requires the highest commitment to obtaining and retaining a diverse staff that provides the best quality services to supporters and constituents. The DLCC is an equal opportunity employer, and it is our policy to recruit, hire, train, promote and administer any and all personnel actions without regard to sex, race, age, color, creed, national origin, religion, sexual orientation, gender identity or expression, physical or mental disability, personal appearance, marital status, family responsibilities, genetic information, or any other legally protected basis. The DLCC will not tolerate any unlawful discrimination, and any such conduct is strictly prohibited.

Democratic Legislative Campaign Committee Home Page

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If **William Clardy** had his way, abortion could be outlawed *even in Maine.*

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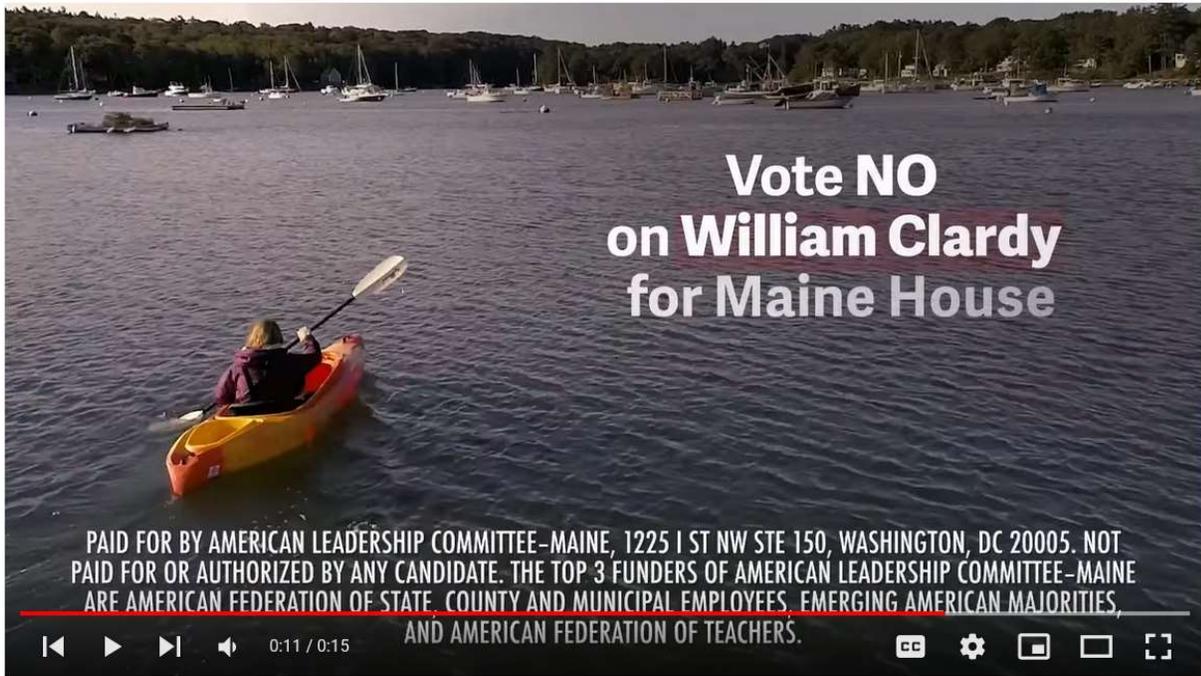
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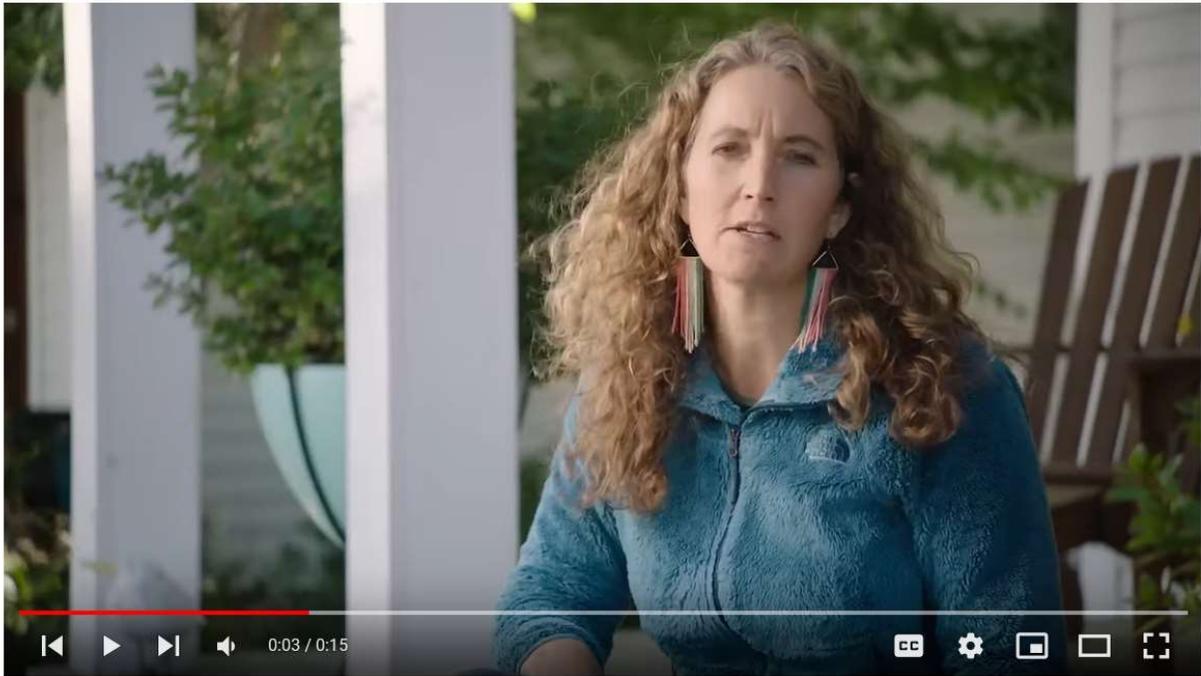
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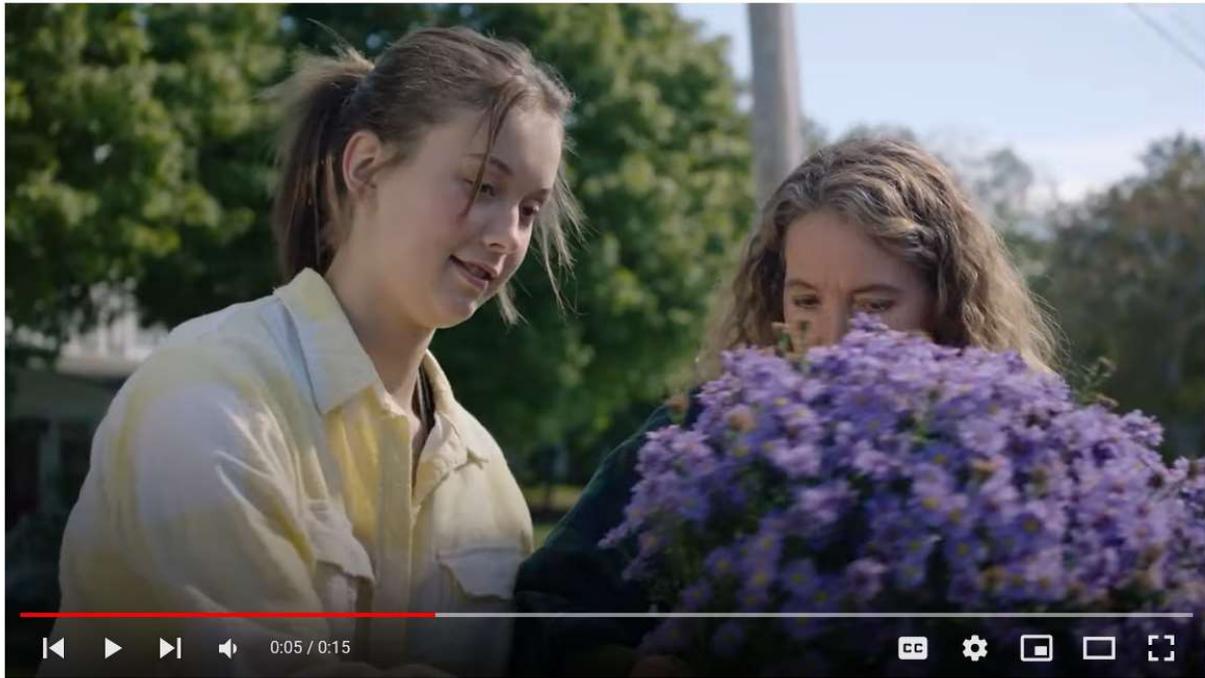


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I trust Bill Bridgeo for Maine House

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9 views Oct 6, 2022



February 1, 2023

Jonathan S. Berkon, Esq.
Elias Law Group
10 G Street NE, Suite 600
Washington, DC 20002

Dear Mr. Berkon,

The Maine Ethics Commission received the enclosed complaint from William Clardy alleging the American Leadership Committee - Maine PAC (“the PAC) did not comply with Maine campaign finance law. As the staff analyzes the complaint, Mr. Clardy is asserting that the PAC:

- 1) failed to disclose in its campaign finance reports legal services by the Elias Law Group and paid staff activity by the Democratic Leadership Campaign Committee (“DLCC”) related to the PAC’s independent expenditure (IE) communications in Maine (both preparing the communications and fixing the disclosure statements),
- 2) filed its October 5, 2022 IE report for digital advertising late, because the PAC entered into an agreement or contract to pay for the advertising before October 3rd,
- 3) filed its October 14, 2022 report later than previously found by the Commission because Ashley Quenneville of the DLCC was discussing possible designs for mailings with Moxie Media during September 23-28, 2022, and
- 4) did not correct the disclosure statements on some YouTube videos following the Commission’s October 26, 2022 meeting.

The Commission staff recognizes that the DLCC has dedicated considerable amounts of staff time and legal services to responding to the previous complaints and amending its IE reports to conform to the Commission’s reporting procedures. Nevertheless, some of the compliance issues raised by Mr. Clardy in his complaint are new.

This letter requests a written response from the PAC by February 10th so that this matter may be considered at the Commission’s meeting on February 28, 2022. If the PAC needs additional time to respond, this matter can be postponed to the Commission’s March 27, 2023 meeting, since Mr. Clardy did not file his complaint until 2½ months after the 2022 general election. Also, with respect to the first issue, please feel free to consult with Emma Burke if the PAC wishes to voluntarily disclose any staff time or legal activity as an in-kind contribution.

Relevant Laws and Rules

Definition of Contribution. The statutory definition of “contribution” includes a “gift ... of money or anything of value made to or received by a committee for the purpose of initiating or influencing a campaign.” 21-A M.R.S. § 1052(3)(A). Contribution also includes “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.” 21-A M.R.S. § 1052(3)(D).

The Commission’s rules state that “the provision of any goods or services without charge or at a charge that is less than the usual or customary charge for goods or services is an in-kind contribution.” 94-270 C.M.R. Ch. 1, § (6)(4). The examples include personnel services. The rules additionally state: “An employer that has authorized an employee to provide services without charge to a candidate or political committee during the employee’s paid worktime has made an in-kind contribution to the candidate or political committee.” Ch. 1, § 4(6)(5).

Definition of Expenditure. The term “expenditure” includes “a purchase, payment, distribution, loan, advance, deposit or gift of money anything of value made for the purpose of initiating or influencing a campaign” and “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. 21-A M.R.S. §§ 1052 (4)(A)(1)&(2). An expenditure includes not just a payment of money, but also a promise or agreement to pay for good or services to influence a candidate’s election. Further guidance on reporting unpaid debts or obligations are set out in the Commission’s rules. 94-270 C.M.R. Ch. 1 § 7(3).

Independent Expenditure (IE) Reporting. IEs are payments for communications to voters (*e.g.*, mailings, advertisements, and digital or telephone messages) advocating for or against candidates without consultation or cooperation with the candidates affected by the communications. 21-A M.R.S. § 1019-B(1). Any person making a single IE over \$250 per candidate must file an IE report disclosing the dates and amounts of the expenditures for the communications, the specific candidate(s) supported or opposed, and an affidavit confirming the expenditure was made independently of the candidates. *Id.* § 1019-B(4).

The deadlines for filing IE reports are set out in the Commission’s Rules. *Id.* § 1019-B(4), 94-270 C.M.R. Ch. 1, § 10(3). In 2022, any person who made an IE in excess of \$250 per candidate between September 9 - October 25, 2022 was required to file an IE report within two calendar days of the date of the expenditure.

Request for Response

Please submit a written response by February 10, 2023. You are welcome to include any information or legal argument you believe is relevant. The Commission staff recommends addressing the following points:

- Did the PAC receive an in-kind contribution from the DLCC for staff time related to the design of mailings, fixing the disclosure statement, or campaign finance compliance?
- Did the PAC receive an in-kind contribution of legal services provided by the Elias Law Group?
- When did the PAC enter into a contract or agreement to pay for the digital advertising reported in the October 5, 2022 IE report? Please describe the process of preparing the videos and whether those preparations constituted a contract or agreement to pay for the communications prior to October 3rd, as suggested by Mr. Clardy.
- Should the Commission revisit its November 30, 2022 decision concerning the October 14, 2022 IE report? Did the DLCC staff's communications with Moxie Media in September 2022 concerning the design of the mailings constitute a contract or agreement to pay for the mailings?
- Any supplemental information you would like to provide concerning the DLCC's efforts to fix the disclaimer on the Generations videos on YouTube.

Thank you for your cooperation. Please let me know if you have any questions.

Sincerely,



Jonathan Wayne
Executive Director

cc: Emily Hogin, Esq.
William Clardy

March 7, 2023

VIA EMAIL

Maine Commission on Governmental Ethics and Election Practices
135 State House Station
Augusta, Maine 04333-0135

Re: American Leadership Committee – Maine

Dear Commissioners:

We write on behalf of American Leadership Committee – Maine (“*ALC-ME*”) in response to questions from Commission staff regarding the PAC’s independent expenditure activity and associated compliance costs during the 2022 election cycle.

1. *Did the PAC receive an in-kind contribution from the DLCC for staff time related to the design of mailings, fixing the disclosure statement, or campaign finance compliance?*

The work designing the mailings at issue and fixing the disclosure statement was primarily performed by Moxie Media under the scope of that contract, and those amounts were reported by ALC-ME.

Democratic Legislative Campaign Committee (“*DLCC*”) staff did supervise Moxie Media’s work and prepared campaign finance reports. There is no reliable way to determine the amount of time allocable to such activity, however. Accordingly, per a conversation with Emma Burke, we are asking the Commission to provide guidance to national organizations on how they should calculate this figure.

As you know, the DLCC is a national political organization dedicated to electing state Democrats all over the country. DLCC staff are generally salaried, and the DLCC incurred no additional overhead cost in connection with staff supervising the Moxie Media contract or filing Maine campaign finance reports.

Under Federal Election Commission (“*FEC*”) regulations, “[t]he payment by any person of compensation for the personal services of another person if those services are rendered without charge to a political committee” is a “contribution” and requires the allocation of expenditures “made on behalf of more than one clearly identified . . . candidate.” 11 C.F.R. §§ 100.54, 106.1(a).

Nonetheless, recognizing that political committee staff will regularly spend time in relation to particular elections without increasing the overhead costs of the political committee, FEC regulations note that “[e]xpenditures for . . . personnel . . . of political committees need not be attributed to individual candidates, unless these expenditures are made on behalf of a clearly identified candidate, and the expenditure can be directly attributed to that candidate.” *Id.* § 106.1(c).

It would be administratively unworkable for DLCC to track staff time across multiple states. Its general practice is to follow the FEC rule in the absence of clear guidance from a state. Under that rule, staff time is tracked and allocated to an in-state organization only where DLCC staff spend time working directly under the supervision or control of a benefitting third party organization. For example, ALC-ME reported in-kind contributions to the House Democratic Campaign Committee (and the corresponding contributions from the DLCC) when DLCC staff participated in phone banks on behalf of that organization. *See* Am. Leadership Comm. – Me., *11-Day Pre-General Report Schedule B-1* (Oct. 28, 2022).

However, time spent supervising its own programs across multiple states and preparing associated campaign finance reports is not tracked and reported if it does not increase the DLCC’s overhead costs and is not performed at the direction or control of a candidate or other organization. The DLCC does not have time records for the 2022 election cycle that would cover time spent supervising the Moxie Media contract or preparing campaign finance reports, and the departure of many of the involved staff at the end of the election cycle would make recreating such timesheets retroactively with any accuracy impossible.

Maine law does not specifically address how to allocate staff time when an out-of-state political committee engages in the state without incurring additional overhead expenses. ALC-ME hopes the Commission will use this opportunity to clarify the reporting rules for staff time going forward and offers the federal standard as a workable solution that accounts for time spent at the direction or control of Maine entities or expenditures that increase an organization’s overall overhead without creating cumbersome and unworkable time-tracking obligations on organizations.

2. *Did the PAC receive an in-kind contribution of legal services provided by the Elias Law Group?*

No. Bills for legal services were issued to the PAC on November 4, 2022, December 12, 2022, and January 13, 2023. The first two invoices were paid by the DLCC on January 20, 2023, and the in-kind contribution will be reported on the April Quarterly report; the January 13 invoice is outstanding. After consulting with Ms. Burke, ALC-ME has amended its post-general and January reports to include the unpaid bills.

3. *When did the PAC enter into a contract or agreement to pay for the digital advertising reported in the October 5, 2022 IE report? Please describe the process of preparing the videos and whether those preparations constituted a contract or*

agreement to pay for the communications prior to October 3rd, as suggested by Mr. Clardy.

The October 5, 2022 IE report reflects digital advertising that ALC-ME pre-purchased from the applicable platforms (Programmatic, such as Hulu, Facebook, and YouTube) on October 3, 2022. October 3 was the date that ALC-ME committed to purchase these digital ads in the reported districts; before that date, ALC-ME was not committed to running digital ads in any Maine district.

ALC-ME described the process of preparing digital ads in materials submitted to the Commission in advance of its November 30, 2022 meeting. *See Letter to Comm’rs RE: Am. Leadership Comm.—Me.* at 2–3 & n.4 (Nov. 16, 2022); *see also id.* Ex. F ¶¶ 16–17. To reiterate that process, ALC-ME commits to purchase a digital ad buy when it pre-pays for the buy from the applicable platform (Programmatic, such as Hulu, Facebook, and YouTube), which the platform then “spends down” daily. The production costs are separately invoiced by ALC-ME’s digital ad vendor, Moxie Media at a later date.

The digital plan is not final until the prepayment date because ALC-ME does not make a final decision about which districts to run ads in — if any — until the buy is set. ALC-ME’s process for independent expenditure digital ads is similar to its process for independent expenditure mail. ALC-ME’s parent entity, American Leadership Committee (“ALC”) hires a digital ad vendor to develop concepts for multiple candidates across multiple states, but not all concepts will be produced as digital ads. For the concepts that are produced, ALC-ME may use the same footage for multiple districts and may end up running the ads in fewer districts than produced.

While considering previous complaints against ALC-ME with regard to the date of reporting mailers, the Commission agreed with ALC-ME that an expenditure is not made until a final decision has been made (e.g., where it is more likely than not that the communication will be shown to voters):

In this case, several actions were taken with respect to the October 13 mailing that strongly imply a promise or agreement to pay for design, postage and printing services before the reported expenditure date of October 12, 2022. These include the DLCC’s October 5 approval of designs for the mailing, the DLCC’s receipt of an October 8 invoice and subsequent October 10 direction by email to pay the invoice (“Approved for payment on 10/11”), and the printing of the mailing on October 10. . . . [T]he Commission determines that October 10 is the date of the expenditure under 21-A M.R.S. § 1052(4)(A)(2) and 94-270 C.M.R. Ch. I § 7(3), rather than October 12.

Me. Ethics Comm’n, *Determination In re: American Leadership Committee – Maine Political Action Committee* at 9–10 (Dec. 21, 2022).

Following the Commission’s November 30, 2022 hearing, ALC-ME sought guidance from Ms. Burke regarding how to amend a report on an expenditure for a mailer that was internally approved by the IE director on 10/20 and printed on 10/19. Ms. Burke said, “I would recommend using 10/19 – that would follow the guidance we give to all candidates and committees using mail house vendors.” Here, the reported expenditure date was the date that the ads were sent to the applicable digital vendors, similar to the date that a mail house vendor prints the ad. At that point, the ads were committed, and although they could still be modified or pulled before being distributed to voters, such changes were unlikely. This expenditure date is therefore consistent with the advice ALC-ME received on reporting mail communications.

4. *Should the Commission revisit its November 30, 2022 decision concerning the October 14, 2022 IE report? Did the DLCC staff’s communications with Moxie Media in September 2022 concerning the design of the mailings constitute a contract or agreement to pay for the mailings?*

No, the Commission should not revisit its November 30, 2022 decision concerning the October 14, 2022 IE report. The Commission’s decision, which was based on two hearings and detailed information that was voluntarily provided in consultation with Commission staff, strikes an appropriate balance between giving the public the earliest possible information about political spending and not overwhelming the disclosure system with speculative plans that must be continuously amended.

Mr. Clardy seeks to reopen the Commission’s determination based on information that was before the Commission prior to the November 30, 2022 hearing, namely, emails that were produced as part of the inquiry into when the expenditure reported in the October 14 report was made. These emails are consistent with what ALC-ME described as its process during the previous complaint:

When making independent expenditures by mail, ALC-ME’s parent entity, American Leadership Committee (“ALC”) will hire a mail vendor to develop mail concepts for multiple candidates and across multiples states, but not all of these concepts will make it to print. For those that do make it to print, ALC may take advantage of bulk printing discounts to print mailers for a group of candidates, but ultimately send mailers to just some of the candidates depending on the available budget for postage. Postage is pre-paid, but design and printing costs are paid 60 days in arrears. ALC generally considers an expenditure final when the postage has been paid, as it is unlikely to be cancelled after that date.

Letter to Comm’rs RE: Am. Leadership Comm.–Me. at 5 (Nov. 16, 2022).

The emails Mr. Clardy takes issue with describe the September 2022 development of mail concepts across multiple districts and candidates and an overall goal to finalize and print the communications by October 5. Ultimately, that plan continued to evolve throughout September,

including which districts would be included, and was not final until October 10, when the plan was approved for payment and the mailers printed. The Commission correctly concluded that October 10 was the date that this expenditure was made, and ALC-ME has already amended its report and paid a fine based on October 10 as the date on which this expenditure was made.

Allowing complainants to reopen complaints based on information that was before the Commission at the time of its decision, especially complainants who participated in the proceedings, sets a dangerous precedent. In Maine courts, the doctrine of *res judicata* prohibits relitigating issues that have already been tried in order to serve “the critical policies of judicial economy, the stability of final judgments, and fairness to litigants.” *Salenius v. Salenius*, 654 A.2d 426, 429–30 (Me. 1995). It applies even though “the second suit relies on a legal theory not advanced in the first case, seeks different relief than that sought in the first case, or involves evidence different from the evidence relevant to the first case.” *Blance v. Alley*, 697 A.2d 828, 829 (Me. 1997) (citing *Petit v. Key Bancshares of Me., Inc.*, 635 A.2d 956, 959 (Me.1993)). Similar principals should discourage the Commission from permitting complainants to require it to revisit its decisions when they disagree with the outcome.

5. *Any supplemental information you would like to provide concerning the DLCC’s efforts to fix the disclaimer on the Generations videos on YouTube.*

The *Generations* ad was pulled from ALC-ME’s digital programming on October 26, 2022. As discussed in its November 16, 2022 letter to the Commission, ALC-ME worked swiftly to pause the purchase of any new digital ads and update the disclaimers on digital ads then running after receiving the staff analysis on October 25, 2022. *Letter to Comm’rs RE: Am. Leadership Comm.–Me.* at 2 (Nov. 16, 2022). After the internal review processes at each of the applicable platforms described in that letter, all Programmatic ads run by ALC-ME on or after October 27, 2022 had the correct disclaimer, all ALC-ME Facebook ads had the accurate disclaimer starting October 28 and 29, 2022 and all ALC-ME YouTube ads were correct on October 29 through November 1, 2022. *See id.* at 2–3 & Ex. B.

As discussed in the November 16, 2022 letter, to place an ad on YouTube, the platform requires that advertisers upload the video to a free YouTube page. The video is then subject to the company’s internal review process. A video is not automatically taken down from the free page when it is no longer being run as a digital ad. The free YouTube page was never intended to reach Maine voters except in order to meet YouTube’s technical requirement that videos be “parked” on a YouTube page before they can be promoted.

The exhibits that Mr. Clardy includes in his complaint are not digital ads. YouTube ads are clearly marked with “Ad” in the bottom left corner, do not show the number of views, do not show how long ago it was uploaded, do not show the video’s title, have a yellow progress bar as opposed to the red one shown in the screenshot, and do not permit the viewer to replay the ad. It is likely that Mr. Clardy was not served this digital ad but instead searched for and found a YouTube channel on which ALC-ME videos were uploaded prior to their distribution as paid

digital ads. That channel includes copies of the previous ads containing the incomplete disclaimer for which ALC-ME has already paid a fine. These videos were not promoted to voters after the dates listed above. *See Letter to Comm'rs RE: Am. Leadership Comm.-Me.* at 2-3 & Ex. B (Nov. 16, 2022).

Sincerely,

A handwritten signature in blue ink, appearing to read "Jonathan Berkon".

Jonathan Berkon
Emily Hogin
Counsel to American Leadership Committee –
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

2022 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
American Leadership Committee - Maine 1225 I St NW Ste 1250 Washington, DC 20005 PHONE:(202) 449-6740 EMAIL: compliance@dlcc.org		Meghan Lyons 1225 I St NW Ste 1250 Washington, DC 20005 PHONE: EMAIL: lyons@dlcc.org	
REPORT	DUE DATE	REPORTING PERIOD	
42-Day Post-General Report	12/20/2022	10/26/2022 - 12/13/2022	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$68,838.29	\$396,076.80
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$68,838.29	\$396,076.80
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$42,624.65	\$394,104.57
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$20,926.99	\$79,368.23
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$63,551.64	\$473,472.80
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	(\$82,682.65)	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$68,838.29	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$63,551.64	
12. CASH BALANCE AT END OF PERIOD	(\$77,396.00)	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$1,500.00	

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

REPORT FILED BY: Heather Kashner
 REPORT FILED ON: 12/20/2022 10:12:00 AM
 LAST MODIFIED:
 COMMITTEE ID: 454265

**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
11/1/2022	Democratic Legislative Campaign Committee 1225 I St NW Suite 1250 Washington, DC, 20005		5	\$8,262.65
11/9/2022	Democratic Legislative Campaign Committee 1225 I St NW Suite 1250 Washington, DC, 20005		5	\$47,877.64
12/8/2022	Democratic Legislative Campaign Committee 1225 I St NW Suite 1250 Washington, DC, 20005		5	\$12,698.00
TOTAL CASH CONTRIBUTIONS				\$68,838.29

**SCHEDULE B
EXPENDITURES TO SUPPORT OR OPPOSE**

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
10/27/2022	Morel Ink 4824 NE 42nd Ave Portland, OR, 97218	Direct mail broker fee debt owed - subvendor of Moxie Media PAYMENT OF \$100.18 TO OPPOSE: Barbara Bagshaw Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$100.90 TO OPPOSE: Gregory E. Foster Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$102.42 TO OPPOSE: Corey Wilson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$102.71 TO OPPOSE: Phillip Ryan Wiseman Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$104.51 TO OPPOSE: Linda L. Baker Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$104.80 TO OPPOSE: Mark Andrew Rouillard Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$109.21 TO OPPOSE: Donna Marie Dodge Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$111.89 TO OPPOSE: David Lawrence Reed Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.	MHS	\$2,483.63

PAYMENT OF \$112.32 TO OPPOSE: Kelly James Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$113.19 TO OPPOSE: Timothy M Roche Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$125.40 TO OPPOSE: Tricia Warren Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$83.26 TO OPPOSE: Jon Connor Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$85.43 TO OPPOSE: James William Sorcek Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$86.80 TO OPPOSE: John Victor Chambers Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$89.77 TO OPPOSE: Crystal Lynn Robinson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$90.93 TO OPPOSE: Charles J. Bussell Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$91.22 TO OPPOSE: Benjamin J Weisner Jurisdiction: State. Party: Unenrolled. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$91.22 TO OPPOSE: Jennifer Marie Morin Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$94.61 TO OPPOSE: William L. Clardy Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$95.19 TO OPPOSE: Reagan LeeAnn Paul Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$95.55 TO OPPOSE: AnnMarie Fredericks Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$95.55 TO OPPOSE: Pamela Diane Buck Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$97.58 TO OPPOSE: James E. Orr Jurisdiction: State. Party: Republican.

		<p>Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$99.17 TO OPPOSE: Tiffany Estabrook Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$99.82 TO OPPOSE: Michael Hall Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p>		
10/27/2022	Moxie Media PO BOX 30084 SEATTLE, WA, 98113	<p>Direct Mail postage (debt owed)</p> <p>PAYMENT OF \$282.20 TO OPPOSE: Jon Connor Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$288.56 TO OPPOSE: James William Sorcek Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$292.69 TO OPPOSE: John Victor Chambers Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$301.64 TO OPPOSE: Crystal Lynn Robinson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$305.08 TO OPPOSE: Charles J. Bussell Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$305.76 TO OPPOSE: Benjamin J Weisner Jurisdiction: State. Party: Unenrolled. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$305.76 TO OPPOSE: Jennifer Marie Morin Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$315.91 TO OPPOSE: William L. Clardy Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$317.63 TO OPPOSE: Reagan LeeAnn Paul Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$318.66 TO OPPOSE: Pamela Diane Buck Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$324.68 TO OPPOSE: James E. Orr Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p>	MHS	\$8,262.65

PAYMENT OF \$329.50 TO OPPOSE:
Tiffany Estabrook Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$331.39 TO OPPOSE:
Michael Hall Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$332.42 TO OPPOSE:
Barbara Bagshaw Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$334.66 TO OPPOSE:
Gregory E. Foster Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$339.13 TO OPPOSE: Corey
Wilson Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$339.99 TO OPPOSE: Phillip
Ryan Wiseman Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$344.52 TO OPPOSE: Kelly
James Jurisdiction: State. Party: Republican.
Office: Representative. ELECTION YEAR:
2022.

PAYMENT OF \$345.50 TO OPPOSE: Linda
L. Baker Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$346.36 TO OPPOSE: Mark
Andrew Rouillard Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$355.13 TO OPPOSE:
AnnMarie Fredericks Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$359.43 TO OPPOSE:
Donna Marie Dodge Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$367.34 TO OPPOSE: David
Lawrence Reed Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$371.12 TO OPPOSE:
Timothy M Roche Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$407.59 TO OPPOSE: Tricia
Warren Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

10/27/2022	Mexie Media PO BOX 30084 SEATTLE, WA, 98113	Direct Mail production (debt owed)	MHS	\$34,362.00
		PAYMENT OF \$1,152.00 TO OPPOSE:- Jon Connor Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,182.00 TO OPPOSE:- James William Soreck Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,201.00 TO OPPOSE:- John Victor Chambers Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,242.00 TO OPPOSE:- Crystal Lynn Robinson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,258.00 TO OPPOSE:- Charles J. Bussell Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,262.00 TO OPPOSE:- Benjamin J Weisner Jurisdiction: State. Party: Unenrolled. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,262.00 TO OPPOSE:- Jennifer Marie Morin Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,300.00 TO OPPOSE:- William L. Clardy Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,317.00 TO OPPOSE:- Reagan LeeAnn Paul Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,322.00 TO OPPOSE:- AnnMarie Fredericks Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,322.00 TO OPPOSE:- Pamela Diane Buck Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,350.00 TO OPPOSE:- James E. Orr Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,372.00 TO OPPOSE:- Tiffany Estabrook Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		
		PAYMENT OF \$1,381.00 TO OPPOSE:- Michael Hall Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-		

		<p>PAYMENT OF \$1,386.00 TO OPPOSE:- Barbara Bagshaw Jurisdiction: State. Party:- Republican. Office: Representative.- ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,396.00 TO OPPOSE:- Gregory E. Foster Jurisdiction: State. Party:- Republican. Office: Representative.- ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,417.00 TO OPPOSE:- Corey Wilson Jurisdiction: State. Party:- Republican. Office: Representative.- ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,421.00 TO OPPOSE:- Phillip Ryan Wiseman Jurisdiction: State.- Party: Republican. Office: Representative.- ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,446.00 TO OPPOSE:- Linda L. Baker Jurisdiction: State. Party:- Republican. Office: Representative.- ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,450.00 TO OPPOSE:- Mark Andrew Rouillard Jurisdiction: State.- Party: Republican. Office: Representative.- ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,511.00 TO OPPOSE:- Donna Marie Dodge Jurisdiction: State.- Party: Republican. Office: Representative.- ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,548.00 TO OPPOSE:- David Lawrence Reed Jurisdiction: State.- Party: Republican. Office: Representative.- ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,554.00 TO OPPOSE:- Kelly James Jurisdiction: State. Party:- Republican. Office: Representative.- ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,566.00 TO OPPOSE:- Timothy M Roche Jurisdiction: State. Party:- Republican. Office: Representative.- ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,735.00 TO OPPOSE:- Tricia Warren Jurisdiction: State. Party:- Republican. Office: Representative.- ELECTION YEAR: 2022.-</p>		
10/27/2022	Moxie Media PO BOX 30084 SEATTLE, WA, 98113	<p>Direct Mail production (debt owed)</p> <p>PAYMENT OF \$1,007.56 TO OPPOSE: Donna Marie Dodge Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$1,032.23 TO OPPOSE: David Lawrence Reed Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$1,036.23 TO OPPOSE: Kelly James Jurisdiction: State. Party: Republican. Office: Representative.</p>	MHS	\$22,913.16

ELECTION YEAR: 2022.

PAYMENT OF \$1,044.24 TO OPPOSE:
Timothy M Roche Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$1,156.93 TO OPPOSE:
Tricia Warren Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$768.17 TO OPPOSE: Jon
Connor Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$788.18 TO OPPOSE:
James William Sorcek Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$800.85 TO OPPOSE: John
Victor Chambers Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$828.19 TO OPPOSE:
Crystal Lynn Robinson Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$838.86 TO OPPOSE:
Charles J. Bussell Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$841.52 TO OPPOSE:
Benjamin J Weisner Jurisdiction: State.
Party: Unenrolled. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$841.52 TO OPPOSE:
Jennifer Marie Morin Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$872.86 TO OPPOSE:
William L. Clardy Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$878.20 TO OPPOSE:
Reagan LeeAnn Paul Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$881.53 TO OPPOSE:
AnnMarie Fredericks Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$881.53 TO OPPOSE:
Pamela Diane Buck Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$900.20 TO OPPOSE:
James E. Orr Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

		<p>PAYMENT OF \$914.87 TO OPPOSE: Tiffany Estabrook Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$920.87 TO OPPOSE: Michael Hall Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$924.21 TO OPPOSE: Barbara Bagshaw Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$930.88 TO OPPOSE: Gregory E. Foster Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$944.88 TO OPPOSE: Corey Wilson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$947.55 TO OPPOSE: Phillip Ryan Wiseman Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$964.22 TO OPPOSE: Linda L. Baker Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$966.88 TO OPPOSE: Mark Andrew Rouillard Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p>		
10/27/2022	Standard Modern Company 186 Duchaine Blvd New Bedford, MA, 02745	<p>Direct mail printing debt owed - subvendor of Moxie Media</p> <p>PAYMENT OF \$300.56 TO OPPOSE: Jon Connor Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$308.39 TO OPPOSE: James William Sorcek Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$313.35 TO OPPOSE: John Victor Chambers Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$324.04 TO OPPOSE: Crystal Lynn Robinson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$328.22 TO OPPOSE: Charles J. Bussell Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$329.26 TO OPPOSE: Benjamin J Weisner Jurisdiction: State.</p>	MHS	\$8,965.21

Party: Unenrolled. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$329.26 TO OPPOSE:
Jennifer Marie Morin Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$341.52 TO OPPOSE:
William L. Clardy Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$343.61 TO OPPOSE:
Reagan LeeAnn Paul Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$344.92 TO OPPOSE:
AnnMarie Fredericks Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$344.92 TO OPPOSE:
Pamela Diane Buck Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$352.22 TO OPPOSE:
James E. Orr Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$357.96 TO OPPOSE:
Tiffany Estabrook Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$360.31 TO OPPOSE:
Michael Hall Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$361.61 TO OPPOSE:
Barbara Bagshaw Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$364.22 TO OPPOSE:
Gregory E. Foster Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$369.70 TO OPPOSE: Corey
Wilson Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$370.75 TO OPPOSE: Phillip
Ryan Wiseman Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$377.27 TO OPPOSE: Linda
L. Baker Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$378.31 TO OPPOSE: Mark
Andrew Rouillard Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

	<p>PAYMENT OF \$394.23 TO OPPOSE: Donna Marie Dodge Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$403.88 TO OPPOSE: David Lawrence Reed Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$405.45 TO OPPOSE: Kelly James Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$408.58 TO OPPOSE: Timothy M Roche Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$452.67 TO OPPOSE: Tricia Warren Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p>	
TOTAL EXPENDITURES TO SUPPORT OR OPPOSE:		\$42,624.65

**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
11/9/2022	Moxie Media PO BOX 30084 SEATTLE, WA, 98113	Production for canceled mailer	MHS	\$10,981.08
11/9/2022	Standard Modern Company 186 Duchaine Blvd New Bedford, MA, 02745	Printing for canceled mailer - subvendor of Moxie Media	MHS	\$7,886.59
11/9/2022	Morel Ink 4824 NE 42nd Ave Portland, OR, 97218	Direct mail broker fee debt owed - subvendor of Moxie Media	MHS	\$2,059.32
TOTAL OPERATING EXPENDITURES				\$20,926.99

**SCHEDULE D
UNPAID DEBTS AND OBLIGATIONS**

- A debt or obligation is incurred if a committee places an order for a good or service without making a payment; makes a promise or agreement to pay for a good or service; signs a contract for a good or service; or receives delivery of a good or service for which the committee has not paid.
- This schedule is a list of all debts and obligations of the committee as of the end of this reporting period.

DATE OF OBLIGATION	CREDITOR	DESCRIPTION	AMOUNT
10/24/2022	Moxie Media PO BOX 30084 SEATTLE, WA, 98113	Mail house and direct mail (design, printing, mailing, and postage all included) Production for canceled mailer	\$1,500.00
TOTAL UNPAID DEBTS AND OBLIGATIONS			\$1,500.00



Commission on Governmental Ethics and Election Practices
 Mail: 135 State House Station, Augusta, Maine 04333
Office: 45 Memorial Circle, Augusta, Maine
 Website: www.maine.gov/ethics
 Phone: 207-287-4179
 Fax: 207-287-6775

2022 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
American Leadership Committee - Maine 1225 I St NW Ste 1250 Washington, DC 20005 PHONE:(202) 449-6740 EMAIL: compliance@dlcc.org		Meghan Lyons 1225 I St NW Ste 1250 Washington, DC 20005 PHONE: EMAIL: lyons@dlcc.org	
REPORT	DUE DATE	REPORTING PERIOD	
42-Day Post-General Report	12/20/2022	10/26/2022 - 12/13/2022	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$68,838.29	\$396,076.80
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$68,838.29	\$396,076.80
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$42,624.65	\$394,104.57
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$20,926.99	\$79,368.23
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$63,551.64	\$473,472.80
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	(\$82,682.65)	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$68,838.29	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$63,551.64	
12. CASH BALANCE AT END OF PERIOD	(\$77,396.00)	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$57,154.00	

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

REPORT FILED BY: Heather Kashner
 REPORT FILED ON: 12/20/2022 10:12:00 AM
 LAST MODIFIED: 3/6/2023 9:35:47 AM
 COMMITTEE ID: 454265

**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
11/1/2022	Democratic Legislative Campaign Committee 1225 I St NW Suite 1250 Washington, DC, 20005		5	\$8,262.65
11/9/2022	Democratic Legislative Campaign Committee 1225 I St NW Suite 1250 Washington, DC, 20005		5	\$47,877.64
12/8/2022	Democratic Legislative Campaign Committee 1225 I St NW Suite 1250 Washington, DC, 20005		5	\$12,698.00
TOTAL CASH CONTRIBUTIONS				\$68,838.29

**SCHEDULE B
EXPENDITURES TO SUPPORT OR OPPOSE**

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
10/27/2022	Morel Ink 4824 NE 42nd Ave Portland, OR, 97218	Direct mail broker fee debt owed - subvendor of Moxie Media PAYMENT OF \$100.18 TO OPPOSE: Barbara Bagshaw Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$100.90 TO OPPOSE: Gregory E. Foster Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$102.42 TO OPPOSE: Corey Wilson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$102.71 TO OPPOSE: Phillip Ryan Wiseman Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$104.51 TO OPPOSE: Linda L. Baker Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$104.80 TO OPPOSE: Mark Andrew Rouillard Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$109.21 TO OPPOSE: Donna Marie Dodge Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$111.89 TO OPPOSE: David Lawrence Reed Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.	MHS	\$2,483.63

PAYMENT OF \$112.32 TO OPPOSE: Kelly James Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$113.19 TO OPPOSE: Timothy M Roche Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$125.40 TO OPPOSE: Tricia Warren Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$83.26 TO OPPOSE: Jon Connor Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$85.43 TO OPPOSE: James William Sorcek Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$86.80 TO OPPOSE: John Victor Chambers Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$89.77 TO OPPOSE: Crystal Lynn Robinson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$90.93 TO OPPOSE: Charles J. Bussell Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$91.22 TO OPPOSE: Benjamin J Weisner Jurisdiction: State. Party: Unenrolled. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$91.22 TO OPPOSE: Jennifer Marie Morin Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$94.61 TO OPPOSE: William L. Clardy Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$95.19 TO OPPOSE: Reagan LeeAnn Paul Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$95.55 TO OPPOSE: AnnMarie Fredericks Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$95.55 TO OPPOSE: Pamela Diane Buck Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.

PAYMENT OF \$97.58 TO OPPOSE: James E. Orr Jurisdiction: State. Party: Republican.

		<p>Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$99.17 TO OPPOSE: Tiffany Estabrook Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$99.82 TO OPPOSE: Michael Hall Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p>		
10/27/2022	Moxie Media PO BOX 30084 SEATTLE, WA, 98113	<p>Direct Mail postage (debt owed)</p> <p>PAYMENT OF \$282.20 TO OPPOSE: Jon Connor Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$288.56 TO OPPOSE: James William Sorcek Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$292.69 TO OPPOSE: John Victor Chambers Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$301.64 TO OPPOSE: Crystal Lynn Robinson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$305.08 TO OPPOSE: Charles J. Bussell Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$305.76 TO OPPOSE: Benjamin J Weisner Jurisdiction: State. Party: Unenrolled. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$305.76 TO OPPOSE: Jennifer Marie Morin Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$315.91 TO OPPOSE: William L. Clardy Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$317.63 TO OPPOSE: Reagan LeeAnn Paul Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$318.66 TO OPPOSE: Pamela Diane Buck Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$324.68 TO OPPOSE: James E. Orr Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p>	MHS	\$8,262.65

PAYMENT OF \$329.50 TO OPPOSE:
Tiffany Estabrook Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$331.39 TO OPPOSE:
Michael Hall Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$332.42 TO OPPOSE:
Barbara Bagshaw Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$334.66 TO OPPOSE:
Gregory E. Foster Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$339.13 TO OPPOSE: Corey
Wilson Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$339.99 TO OPPOSE: Phillip
Ryan Wiseman Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$344.52 TO OPPOSE: Kelly
James Jurisdiction: State. Party: Republican.
Office: Representative. ELECTION YEAR:
2022.

PAYMENT OF \$345.50 TO OPPOSE: Linda
L. Baker Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$346.36 TO OPPOSE: Mark
Andrew Rouillard Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$355.13 TO OPPOSE:
AnnMarie Fredericks Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$359.43 TO OPPOSE:
Donna Marie Dodge Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$367.34 TO OPPOSE: David
Lawrence Reed Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$371.12 TO OPPOSE:
Timothy M Roche Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$407.59 TO OPPOSE: Tricia
Warren Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

10/27/2022	Mexie Media PO BOX 30084 SEATTLE, WA, 98113	Direct Mail production (debt owed)	MHS	\$34,362.00
		PAYMENT OF \$1,152.00 TO OPPOSE:- Jon Connor Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,182.00 TO OPPOSE:- James William Soreck Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,201.00 TO OPPOSE:- John Victor Chambers Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,242.00 TO OPPOSE:- Crystal Lynn Robinson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,258.00 TO OPPOSE:- Charles J. Bussell Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,262.00 TO OPPOSE:- Benjamin J Weisner Jurisdiction: State. Party: Unenrolled. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,262.00 TO OPPOSE:- Jennifer Marie Morin Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,300.00 TO OPPOSE:- William L. Clardy Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,317.00 TO OPPOSE:- Reagan LeeAnn Paul Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,322.00 TO OPPOSE:- AnnMarie Fredericks Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,322.00 TO OPPOSE:- Pamela Diane Buck Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,350.00 TO OPPOSE:- James E. Orr Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,372.00 TO OPPOSE:- Tiffany Estabrook Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		
		PAYMENT OF \$1,381.00 TO OPPOSE:- Michael Hall Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.		

		<p>PAYMENT OF \$1,386.00 TO OPPOSE:- Barbara Bagshaw Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,396.00 TO OPPOSE:- Gregory E. Foster Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,417.00 TO OPPOSE:- Corey Wilson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,421.00 TO OPPOSE:- Phillip Ryan Wiseman Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,446.00 TO OPPOSE:- Linda L. Baker Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,450.00 TO OPPOSE:- Mark Andrew Rouillard Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,511.00 TO OPPOSE:- Donna Marie Dodge Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,548.00 TO OPPOSE:- David Lawrence Reed Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,554.00 TO OPPOSE:- Kelly James Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,566.00 TO OPPOSE:- Timothy M Roche Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-</p> <p>PAYMENT OF \$1,735.00 TO OPPOSE:- Tricia Warren Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.-</p>		
10/27/2022	Moxie Media PO BOX 30084 SEATTLE, WA, 98113	<p>Direct Mail production (debt owed)</p> <p>PAYMENT OF \$1,007.56 TO OPPOSE: Donna Marie Dodge Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$1,032.23 TO OPPOSE: David Lawrence Reed Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$1,036.23 TO OPPOSE: Kelly James Jurisdiction: State. Party: Republican. Office: Representative.</p>	MHS	\$22,913.16

ELECTION YEAR: 2022.

PAYMENT OF \$1,044.24 TO OPPOSE:
Timothy M Roche Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$1,156.93 TO OPPOSE:
Tricia Warren Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$768.17 TO OPPOSE: Jon
Connor Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$788.18 TO OPPOSE:
James William Sorcek Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$800.85 TO OPPOSE: John
Victor Chambers Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$828.19 TO OPPOSE:
Crystal Lynn Robinson Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$838.86 TO OPPOSE:
Charles J. Bussell Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$841.52 TO OPPOSE:
Benjamin J Weisner Jurisdiction: State.
Party: Unenrolled. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$841.52 TO OPPOSE:
Jennifer Marie Morin Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$872.86 TO OPPOSE:
William L. Clardy Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$878.20 TO OPPOSE:
Reagan LeeAnn Paul Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$881.53 TO OPPOSE:
AnnMarie Fredericks Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$881.53 TO OPPOSE:
Pamela Diane Buck Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$900.20 TO OPPOSE:
James E. Orr Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

		<p>PAYMENT OF \$914.87 TO OPPOSE: Tiffany Estabrook Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$920.87 TO OPPOSE: Michael Hall Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$924.21 TO OPPOSE: Barbara Bagshaw Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$930.88 TO OPPOSE: Gregory E. Foster Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$944.88 TO OPPOSE: Corey Wilson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$947.55 TO OPPOSE: Phillip Ryan Wiseman Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$964.22 TO OPPOSE: Linda L. Baker Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$966.88 TO OPPOSE: Mark Andrew Rouillard Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p>		
10/27/2022	Standard Modern Company 186 Duchaine Blvd New Bedford, MA, 02745	<p>Direct mail printing debt owed - subvendor of Moxie Media</p> <p>PAYMENT OF \$300.56 TO OPPOSE: Jon Connor Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$308.39 TO OPPOSE: James William Sorcek Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$313.35 TO OPPOSE: John Victor Chambers Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$324.04 TO OPPOSE: Crystal Lynn Robinson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$328.22 TO OPPOSE: Charles J. Bussell Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$329.26 TO OPPOSE: Benjamin J Weisner Jurisdiction: State.</p>	MHS	\$8,965.21

Party: Unenrolled. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$329.26 TO OPPOSE:
Jennifer Marie Morin Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$341.52 TO OPPOSE:
William L. Clardy Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$343.61 TO OPPOSE:
Reagan LeeAnn Paul Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$344.92 TO OPPOSE:
AnnMarie Fredericks Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$344.92 TO OPPOSE:
Pamela Diane Buck Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$352.22 TO OPPOSE:
James E. Orr Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$357.96 TO OPPOSE:
Tiffany Estabrook Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$360.31 TO OPPOSE:
Michael Hall Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$361.61 TO OPPOSE:
Barbara Bagshaw Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$364.22 TO OPPOSE:
Gregory E. Foster Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$369.70 TO OPPOSE: Corey
Wilson Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$370.75 TO OPPOSE: Phillip
Ryan Wiseman Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$377.27 TO OPPOSE: Linda
L. Baker Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$378.31 TO OPPOSE: Mark
Andrew Rouillard Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

	<p>PAYMENT OF \$394.23 TO OPPOSE: Donna Marie Dodge Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$403.88 TO OPPOSE: David Lawrence Reed Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$405.45 TO OPPOSE: Kelly James Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$408.58 TO OPPOSE: Timothy M Roche Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$452.67 TO OPPOSE: Tricia Warren Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p>	
TOTAL EXPENDITURES TO SUPPORT OR OPPOSE:		\$42,624.65

**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
11/9/2022	Moxie Media PO BOX 30084 SEATTLE, WA, 98113	Production for canceled mailer	MHS	\$10,981.08
11/9/2022	Standard Modern Company 186 Duchaine Blvd New Bedford, MA, 02745	Printing for canceled mailer - subvendor of Moxie Media	MHS	\$7,886.59
11/9/2022	Morel Ink 4824 NE 42nd Ave Portland, OR, 97218	Direct mail broker fee debt owed - subvendor of Moxie Media	MHS	\$2,059.32
TOTAL OPERATING EXPENDITURES				\$20,926.99

**SCHEDULE D
UNPAID DEBTS AND OBLIGATIONS**

- A debt or obligation is incurred if a committee places an order for a good or service without making a payment; makes a promise or agreement to pay for a good or service; signs a contract for a good or service; or receives delivery of a good or service for which the committee has not paid.
- This schedule is a list of all debts and obligations of the committee as of the end of this reporting period.

DATE OF OBLIGATION	CREDITOR	DESCRIPTION	AMOUNT
10/24/2022	Moxie Media PO BOX 30084 SEATTLE, WA, 98113	Mail house and direct mail (design, printing, mailing, and postage all included) Production for canceled mailer	\$1,500.00
11/4/2022	Elias Law Group 10 G St NE Ste 600 Washington, DC, 20002	Professional services (graphic design, legal services, web design, etc.) Legal Services	\$29,346.00
12/2/2022	Elias Law Group 10 G St NE Ste 600 Washington, DC, 20002	Professional services (graphic design, legal services, web design, etc.) Legal Services	\$26,308.00
TOTAL UNPAID DEBTS AND OBLIGATIONS			\$57,154.00



Commission on Governmental Ethics and Election Practices
 Mail: 135 State House Station, Augusta, Maine 04333
Office: 45 Memorial Circle, Augusta, Maine
 Website: www.maine.gov/ethics
 Phone: 207-287-4179
 Fax: 207-287-6775

2022 INDEPENDENT EXPENDITURE REPORT

COMMITTEE		TREASURER
American Leadership Committee - Maine 1225 I St NW Ste 1250 Washington, DC 20005 PHONE: (202) 449-6740 EMAIL: compliance@dlcc.org		Meghan Lyons 1225 I St NW Ste 1250 Washington, DC 20005 PHONE:(202) 449-6740 EMAIL: lyons@dlcc.org
REPORT	DUE DATE	REPORTING PERIOD
2-Day Pre-General IE Report	10/05/2022	10/03/2022-10/03/2022

FINANCIAL ACTIVITY SUMMARY

EXPENDITURES	
Total independent expenditures greater than \$250 per candidate	\$151,950.65
Total independent expenditures of \$250 or less per candidate	\$0.00
Total independent expenditures for all candidates	\$151,950.65

AFFIDAVIT

STATE OF _____

COUNTY OF _____

Heather Kashner, being duly sworn, attests that each of the expenditures listed in the attached report was made independently of, and not in cooperation, consultation, or concert with, or at the request or suggestion of, the candidate(s) named in the report, the political committee of the candidate(s), or their agents.

 (Signature of Affiant)

Sworn to before me this _____ day of _____ 2022

 (Notary Public/Attorney at Law)

Making a false statement under oath is punishable by law.

REPORT FILED BY: Heather Kashner
 REPORT FILED ON: 10/5/2022 2:37:53 PM
 LAST MODIFIED: 10/28/2022 6:05:09 PM
 COMMITTEE ID: 454265
 REPORT NUMBER: 35111

**SCHEDULE B-IE-1
CANDIDATE(S) SUPPORTED/OPOSED**

Expenditure Date	Support / Oppose	Candidate Name	Office	District / County	Payee	Expenditure Amount
10/3/2022	OPPOSE	Phillip Ryan Wiseman	Representative	55	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Jon Connor	Representative	96	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Mr. John Victor Chambers	Representative	9	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Mr. Gregory E Foster	Representative	86	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Mr. Adam R Lee	Representative	89	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Mr. Adam R Lee	Representative	89	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Mr. Adam R Lee	Representative	89	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Hon. Jessica L Fay	Representative	86	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Hon. Jessica L Fay	Representative	86	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Hon. Jessica L Fay	Representative	86	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Ms. Jennifer Marie Morin	Representative	20	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Barbara Bagshaw	Representative	106	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Mr. Corey Wilson	Representative	57	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	David Lawrence Reed	Representative	105	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Ms. Tricia Warren	Representative	48	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Mr. Timothy M Roche	Representative	145	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Mr. Daniel Joseph Shagoury	Representative	55	Silversmith Strategies	\$960.00

10/3/2022	SUPPORT	Mr. Daniel Joseph Shagoury	Representative	55	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Mr. Daniel Joseph Shagoury	Representative	55	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Hon. Tiffany Danielle Roberts	Representative	149	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Hon. Tiffany Danielle Roberts	Representative	149	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Hon. Tiffany Danielle Roberts	Representative	149	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Mrs. Crystal Lynn Robinson	Representative	44	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Ms. Rebecca L Jauch	Representative	51	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Ms. Rebecca L Jauch	Representative	51	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Ms. Rebecca L Jauch	Representative	51	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Ms. Allison L Hepler	Representative	49	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Ms. Allison L Hepler	Representative	49	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Ms. Allison L Hepler	Representative	49	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Mr. Mark Andrew Rouillard	Representative	149	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Mr. H. Scott Landry	Representative	75	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Mr. H. Scott Landry	Representative	75	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Mr. H. Scott Landry	Representative	75	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Annie Graham	Representative	105	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Annie Graham	Representative	105	Silversmith Strategies	\$350.00

10/3/2022	SUPPORT	Annie Graham	Representative	105	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Mrs. Pamela Diane Buck	Representative	142	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Hon. Holly B Stover	Representative	48	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Hon. Holly B Stover	Representative	48	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Hon. Holly B Stover	Representative	48	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Ms. Linda L Baker	Representative	51	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Hon. Daniel J Hobbs	Representative	145	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Hon. Daniel J Hobbs	Representative	145	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Hon. Daniel J Hobbs	Representative	145	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Hon. Anne Churchill Perry	Representative	9	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Hon. Anne Churchill Perry	Representative	9	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Hon. Anne Churchill Perry	Representative	9	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Mr. William R Bridgeo	Representative	60	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Mr. William R Bridgeo	Representative	60	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Mr. William R Bridgeo	Representative	60	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Mrs. Donna Marie Dodge	Representative	83	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Mr. William D Pluecker	Representative	44	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Mr. William D Pluecker	Representative	44	Silversmith Strategies	\$350.00

10/3/2022	SUPPORT	Mr. William D Pluecker	Representative	44	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Hon. Walter N Riseman	Representative	83	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Hon. Walter N Riseman	Representative	83	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Hon. Walter N Riseman	Representative	83	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Margaret D English-Flanagan	Representative	37	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Margaret D English-Flanagan	Representative	37	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Margaret D English-Flanagan	Representative	37	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Tavis Rock Hasenfus	Representative	57	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Tavis Rock Hasenfus	Representative	57	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Tavis Rock Hasenfus	Representative	57	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Mr. Michael Hall	Representative	107	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Ms. Tiffany Estabrook	Representative	75	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Ms. Reagan LeeAnn Paul	Representative	37	Silversmith Strategies	\$539.01
10/3/2022	OPPOSE	Mr. Charles J Bussell	Representative	54	Silversmith Strategies	\$539.01
10/3/2022	SUPPORT	Ms. Karen L Montell	Representative	54	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Ms. Karen L Montell	Representative	54	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Ms. Karen L Montell	Representative	54	Silversmith Strategies	\$539.02
10/3/2022	SUPPORT	Ms. Kathleen A Shaw	Representative	88	Silversmith Strategies	\$960.00

10/3/2022	SUPPORT	Ms. Kathleen A Shaw	Representative	88	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Ms. Kathleen A Shaw	Representative	88	Silversmith Strategies	\$539.02
10/3/2022	SUPPORT	Hon. Raegan French LaRoche	Representative	59	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Hon. Raegan French LaRoche	Representative	59	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Hon. Raegan French LaRoche	Representative	59	Silversmith Strategies	\$539.02
10/3/2022	OPPOSE	Mr. James E Orr	Representative	59	Silversmith Strategies	\$539.02
10/3/2022	OPPOSE	Mr. William L Clardy	Representative	60	Silversmith Strategies	\$539.02
10/3/2022	SUPPORT	Hon. Kevin O'Connell	Representative	20	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Hon. Kevin O'Connell	Representative	20	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Hon. Kevin O'Connell	Representative	20	Silversmith Strategies	\$539.02
10/3/2022	SUPPORT	Mr. Wesley John Davie	Representative	143	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Mr. Wesley John Davie	Representative	143	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Mr. Wesley John Davie	Representative	143	Silversmith Strategies	\$539.02
10/3/2022	OPPOSE	Mr. Benjamin J Weisner	Representative	89	Silversmith Strategies	\$539.02
10/3/2022	SUPPORT	Dr. Jane Pearson Pringle	Representative	107	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Dr. Jane Pearson Pringle	Representative	107	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Dr. Jane Pearson Pringle	Representative	107	Silversmith Strategies	\$539.02
10/3/2022	OPPOSE	Mrs. AnnMarie Fredericks	Representative	143	Silversmith Strategies	\$539.02

10/3/2022	SUPPORT	Mr. Dana Clifford Reed	Representative	406	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Mr. Dana Clifford Reed	Representative	106	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Mr. Dana Clifford Reed	Representative	106	Silversmith Strategies	\$539.02
10/3/2022	OPPOSE	Mr. James William Sorcek	Representative	88	Silversmith Strategies	\$539.02
10/3/2022	SUPPORT	Mr. Michel A Lajoie	Representative	96	Silversmith Strategies	\$539.02
10/3/2022	SUPPORT	Mr. Michel A Lajoie	Representative	96	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Mr. Michel A Lajoie	Representative	96	Silversmith Strategies	\$350.00
10/3/2022	SUPPORT	Anne-Marie Mastraccio	Representative	142	Silversmith Strategies	\$539.02
10/3/2022	SUPPORT	Anne-Marie Mastraccio	Representative	142	Silversmith Strategies	\$960.00
10/3/2022	SUPPORT	Anne-Marie Mastraccio	Representative	142	Silversmith Strategies	\$350.00
10/3/2022	OPPOSE	Mrs. Kelly James	Representative	49	Silversmith Strategies	\$539.02
10/3/2022	SUPPORT	Mr. Adam R Lee	Representative	89	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Hon. Jessica L Fay	Representative	86	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Mr. Daniel Joseph Shagoury	Representative	55	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Hon. Tiffany Danielle Roberts	Representative	149	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Ms. Rebecca L Jauch	Representative	51	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Ms. Allison L Hepler	Representative	49	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Mr. H. Scott Landry	Representative	75	Uplift Strategies	\$4,650.00

10/3/2022	SUPPORT	Annie Graham	Representative	105	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Hon. Holly B Stover	Representative	48	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Hon. Daniel J Hobbs	Representative	145	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Hon. Anne Churchill Perry	Representative	9	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Mr. William R Bridgeo	Representative	60	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Mr. William D Pluecker	Representative	44	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Hon. Walter N Riseman	Representative	83	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Margaret D English-Flanagan	Representative	37	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Tavis Rock Hasenfus	Representative	57	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Ms. Karen L Montell	Representative	54	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Ms. Kathleen A Shaw	Representative	88	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Hon. Raegan French LaRochelle	Representative	59	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Hon. Kevin O'Connell	Representative	20	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Mr. Wesley John Davie	Representative	143	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Dr. Jane Pearson Pringle	Representative	107	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Mr. Dana Clifford Reed	Representative	106	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Mr. Michel A Lajoie	Representative	96	Uplift Strategies	\$4,650.00
10/3/2022	SUPPORT	Anne-Marie Mastraccio	Representative	142	Uplift Strategies	\$4,650.00
Total itemized independent expenditures greater than \$250 per candidate						\$151,950.65

Total unitemized independent expenditures of \$250 or less per candidate	\$0.00
Total independent expenditures for all candidates	\$151,950.65

**SCHEDULE B-IE-2
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	Expenditure type	Net Amount
10/3/2022	Silversmith Strategies 1461 W Grand Ave Chicago, IL, 60642	Digital Communications	ONL	\$8,750.00
10/3/2022	Silversmith Strategies 1461 W Grand Ave Chicago, IL, 60642	Digital Ad Production (Estimate)	ONL	\$24,000.00
10/3/2022	Silversmith Strategies 1461 W Grand Ave Chicago, IL, 60642	Digital Ad Production	ONL	\$26,950.65
10/3/2022	Uplift Strategies 2120 University Ave Berkeley, CA, 94704	Digital Ad Buy - subvendor of Silversmith Strategies	ONL	\$116,250.00
Total Expenditure				\$151,950.65



Commission on Governmental Ethics and Election Practices
 Mail: 135 State House Station, Augusta, Maine 04333
Office: 45 Memorial Circle, Augusta, Maine
 Website: www.maine.gov/ethics
 Phone: 207-287-4179
 Fax: 207-287-6775

2022 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
NRA POLITICAL VICTORY FUND 11250 Waples Mill Road Fairfax, VA 22030 PHONE: (703) 267-1147 EMAIL: pvfcompliance@nrahq.org		Christina M Majors 11250 Waples Mill Road Fairfax, VA 22030 PHONE: EMAIL: pvfcompliance@nrahq.org	
REPORT	DUE DATE	REPORTING PERIOD	
11-Day Pre-General Report	10/28/2022	10/01/2022 - 10/25/2022	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$39,773.49	\$39,893.49
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$39,773.49	\$39,893.49
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$39,773.49	\$39,893.49
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$0.00	\$0.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$39,773.49	\$39,893.49
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$0.00	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$39,773.49	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$39,773.49	
12. CASH BALANCE AT END OF PERIOD	\$0.00	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

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

REPORT FILED BY: Christina M. Majors
 REPORT FILED ON: 10/28/2022 5:55:47 PM
 LAST MODIFIED: 11/15/2022 10:10:53 AM
 COMMITTEE ID: 334

**SCHEDULE A
CASH CONTRIBUTIONS**

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

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

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
10/3/2022	Contributors giving \$50 or less		12	\$3,565.49
10/11/2022	Contributors giving \$50 or less	Unitemized Lump Sum	12	\$4,153.26
10/17/2022	Contributors giving \$50 or less	Unitemized Lump sum	12	\$1,449.24
10/17/2022	Contributors giving \$50 or less	Unitemized Lump Sum	12	\$30,605.50
TOTAL CASH CONTRIBUTIONS				\$39,773.49

**SCHEDULE B
EXPENDITURES TO SUPPORT OR OPPOSE**

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
10/3/2022	PROLIST, INC. 4510 BUCKEYSTOWN PIKE, SUITE M FREDERICK, MD, 21703	Endorsement postcards and postage PAYMENT OF \$246.84 TO SUPPORT: Abden Simmons Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022. PAYMENT OF \$246.84 TO SUPPORT: Benjamin C. Hymes Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$246.84 TO SUPPORT: Billy Bob Faulkingham Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$246.84 TO SUPPORT: Brian Langley Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022. PAYMENT OF \$246.84 TO SUPPORT: Corey Wilson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$246.84 TO SUPPORT: Eric L. Brakey Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022. PAYMENT OF \$246.84 TO SUPPORT: Heidi H Sampson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$246.84 TO SUPPORT: Jeffrey Sean Adams Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022. PAYMENT OF \$246.84 TO SUPPORT:	MHS	\$3,565.49

		<p>Lucas John Lanigan Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$246.84 TO SUPPORT: Matthew Pouliot Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$246.84 TO SUPPORT: Michael Dana Perkins Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$246.84 TO SUPPORT: Reagan LeeAnn Paul Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$246.84 TO SUPPORT: Sheila A. Lyman Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$356.57 TO SUPPORT: Paul R. LePage Jurisdiction: State. Party: Republican. Office: Governor. ELECTION YEAR: 2022.</p>		
10/11/2022	<p>Connection Strategy, LLC P.O. Box 2192 Arlington, VA, 22202</p>	<p>In Support of Paul LePage</p> <p>PAYMENT OF \$4,153.26 TO SUPPORT: Paul R. LePage Jurisdiction: State. Party: Republican. Office: Governor. ELECTION YEAR: 2022.</p>	PHO	\$4,153.26
10/11/2022	<p>Creative Strategic Solutions, LLC 7708 Richmond Hwy Suite 1018 Arlington, VA, 20598</p>	<p>In Support of Paul LePage</p> <p>PAYMENT OF \$4,153.26 TO SUPPORT: Paul R. LePage Jurisdiction: State. Party: Republican. Office: Governor. ELECTION YEAR: 2022.</p>	PHO	\$4,153.26
10/17/2022	<p>i360, LLC 29374 Network Place Chicago, IL, 60673</p>	<p>Peer to Peer Text Messages</p> <p>PAYMENT OF \$11.28 TO SUPPORT: Rachel Henderson Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$12.48 TO SUPPORT: Jennifer Lynn Poirier Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$15.66 TO SUPPORT: Lynn J Madison Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$16.38 TO SUPPORT: Sheila A. Lyman Jurisdiction: State. Party: Republican. Office: Representative. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$16.44 TO SUPPORT: Corey Wilson Jurisdiction: State. Party:</p>	PHO	\$863.22

Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$16.74 TO SUPPORT:
Robert W Nutting Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$18.00 TO SUPPORT:
Amanda Noelle Collamore Jurisdiction:
State. Party: Republican. Office:
Representative. ELECTION YEAR: 2022.

PAYMENT OF \$19.20 TO SUPPORT:
Reagan LeeAnn Paul Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$19.86 TO SUPPORT: Billy
Bob Faulkingham Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$19.92 TO SUPPORT:
Edward Polewarczyk Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$21.12 TO SUPPORT: Amy
B. Arata Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$21.24 TO SUPPORT: Lucas
John Lanigan Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$21.36 TO SUPPORT: Heidi
H Sampson Jurisdiction: State. Party:
Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$23.28 TO SUPPORT:
Randall Adam Greenwood Jurisdiction:
State. Party: Republican. Office:
Representative. ELECTION YEAR: 2022.

PAYMENT OF \$24.24 TO SUPPORT:
Jennifer Marie Morin Jurisdiction: State.
Party: Republican. Office: Representative.
ELECTION YEAR: 2022.

PAYMENT OF \$30.00 TO SUPPORT:
Abden Simmons Jurisdiction: State. Party:
Republican. Office: Senator. ELECTION
YEAR: 2022.

PAYMENT OF \$54.90 TO SUPPORT:
Michael Dana Perkins Jurisdiction: State.
Party: Republican. Office: Senator.
ELECTION YEAR: 2022.

PAYMENT OF \$60.00 TO SUPPORT: Eric
L. Brakey Jurisdiction: State. Party:
Republican. Office: Senator. ELECTION
YEAR: 2022.

PAYMENT OF \$69.18 TO SUPPORT: Brian
Langley (Special) Jurisdiction: State. Party:
Republican. Office: Senator. ELECTION
YEAR: 2022.

		<p>PAYMENT OF \$71.94 TO SUPPORT: Lisa Keim Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$75.00 TO SUPPORT: Bradlee T Farrin Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$75.00 TO SUPPORT: Marianne Moore Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$75.00 TO SUPPORT: Matthew A Harrington Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$75.00 TO SUPPORT: Stacey K. Guerin Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p>		
10/17/2022	i360, LLC 29374 Network Place Chicago, IL, 60673	<p>Text messages</p> <p>PAYMENT OF \$144.18 TO SUPPORT: Marianne Moore Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$30.00 TO SUPPORT: Abden Simmons Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$54.90 TO SUPPORT: Michael Dana Perkins Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$60.00 TO SUPPORT: Eric L. Brakey Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$71.94 TO SUPPORT: Lisa Keim Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$75.00 TO SUPPORT: Bradlee T Farrin Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$75.00 TO SUPPORT: Matthew A Harrington Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p> <p>PAYMENT OF \$75.00 TO SUPPORT: Stacey K. Guerin Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022.</p>	PHO	\$586.02

10/17/2022	PROLIST, INC. 4510 BUCKEYSTOWN PIKE, SUITE M FREDERICK, MD, 21703	Endorsement Cards PAYMENT OF \$30,605.50 TO SUPPORT: Paul R. LePage Jurisdiction: State. Party: Republican. Office: Governor. ELECTION YEAR: 2022.	MHS	\$30,605.50
TOTAL EXPENDITURES TO SUPPORT OR OPPOSE:				\$39,773.49



Commission on Governmental Ethics and Election Practices
 Mail: 135 State House Station, Augusta, Maine 04333
Office: 45 Memorial Circle, Augusta, Maine
 Website: www.maine.gov/ethics
 Phone: 207-287-4179
 Fax: 207-287-6775

2022 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
RSLC PAC 1201 F ST NW, STE 675 WASHINGTON, DC 20004 PHONE:(202) 448-5160 EMAIL: COMPLIANCE@RSLC.GOP		CABELL HOBBS 1201 F ST NW, STE 675 WASHINGTON, DC 20004 PHONE: EMAIL: COMPLIANCE@RSLC.GOP	
REPORT	DUE DATE	REPORTING PERIOD	
11-Day Pre-General Report	10/28/2022	10/12/2022 - 10/25/2022	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$65,282.58	\$65,282.58
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$65,282.58	\$65,282.58
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$65,282.58	\$65,282.58
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$0.00	\$0.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$65,282.58	\$65,282.58
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$0.00	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$65,282.58	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$65,282.58	
12. CASH BALANCE AT END OF PERIOD	\$0.00	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

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

REPORT FILED BY: CABELL HOBBS
 REPORT FILED ON: 10/27/2022 1:30:46 PM
 LAST MODIFIED:
 COMMITTEE ID: 465618

**SCHEDULE A
CASH CONTRIBUTIONS**

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

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

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
10/14/2022	General Treasury Transfer		10	\$65,282.58
TOTAL CASH CONTRIBUTIONS				\$65,282.58

**SCHEDULE B
EXPENDITURES TO SUPPORT OR OPPOSE**

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
10/14/2022	BULLSEYE PUBLIC AFFAIRS, LLC 200 N CONGRESS ST, SUITE 500 JACKSON, MS, 39201	TV ADVERTISING- PLACEMENT/PRODUCTION PAYMENT OF \$18,400.00 TO OPPOSE:- Troy D. Jackson Jurisdiction: State. Party:- Democratic. Office: Senator. ELECTION YEAR: 2022:- PAYMENT OF \$4,600.00 TO SUPPORT:- Susan Bernard Jurisdiction: State. Party:- Republican. Office: Senator. ELECTION YEAR: 2022:-	TVN	\$23,000.00
10/14/2022	BULLSEYE PUBLIC AFFAIRS, LLC 200 N CONGRESS ST, SUITE 500 JACKSON, MS, 39201	TV ADVERTISING PRODUCTION PAYMENT OF \$1,000.00 TO SUPPORT: Susan Bernard Jurisdiction: State. Party: Republican. Office: Senator. ELECTION YEAR: 2022. PAYMENT OF \$4,000.00 TO OPPOSE: Troy D. Jackson Jurisdiction: State. Party: Democratic. Office: Senator. ELECTION YEAR: 2022.	TVN	\$5,000.00
10/14/2022	BULLSEYE PUBLIC AFFAIRS, LLC 200 N CONGRESS ST, SUITE 500 JACKSON, MS, 39201	RADIO ADVERTISING- PRODUCTION/PLACEMENT PAYMENT OF \$12,056.52 TO SUPPORT:- Susan Bernard Jurisdiction: State. Party:- Republican. Office: Senator. ELECTION YEAR: 2022:- PAYMENT OF \$48,226.06 TO OPPOSE:- Troy D. Jackson Jurisdiction: State. Party:- Democratic. Office: Senator. ELECTION YEAR: 2022:-	RAD	\$60,282.58

10/14/2022	BULLSEYE PUBLIC AFFAIRS, LLC 200 N CONGRESS ST, SUITE 500 JACKSON, MS, 39201	RADIO ADVERTISING PRODUCTION PAYMENT OF \$2,000.00 TO OPPOSE: Troy D. Jackson Jurisdiction: State. Party: Democratic. Office: Senator. ELECTION YEAR: 2022.	RAD	\$2,000.00
10/14/2022	BULLSEYE PUBLIC AFFAIRS, LLC 200 N CONGRESS ST, SUITE 500 JACKSON, MS, 39201	RADIO ADVERTISING PLACEMENT PAYMENT OF \$58,282.58 TO OPPOSE: Troy D. Jackson Jurisdiction: State. Party: Democratic. Office: Senator. ELECTION YEAR: 2022.	RAD	\$58,282.58
TOTAL EXPENDITURES TO SUPPORT OR OPPOSE:				\$65,282.58

Commission Penalty Decisions - PACs, BQCs, Party Committees (2018 - present)

Committee Name	Requested Waivers of Late-Filing Penalties	Preliminary Penalty	Final Penalty	Commission Meeting Date
Waiver Requests				
Maine United Auto Workers PAC	Late January Quarterly	\$400.00	\$400.00	04/25/18
Maine Health Care Assoc. PAC	Late 24-Hour Report	\$2,760.00	\$500.00	08/29/18
Fecteau Leadership PAC	Late 24-Hour Report	\$400.00	\$400.00	08/29/18
 				
New Mainers PAC	Late 24-Hour Report	\$10,000.00	\$1,000.00	03/06/19
Senate Democratic Campaign Committee	Late January Quarterly	\$1,010.50	\$750.00	04/24/19
Unite Portland PAC (<i>Municipal</i>)	Late IE Report	\$5,000.00	\$1,250.00	12/18/19
Unite Portland PAC (<i>Municipal</i>)	Late IE Report	\$2,052.16	\$750.00	12/18/19
 				
Women's Leadership Fund PAC	Late IE Report	\$100.00	\$50.00	08/11/20
Maine Truck PAC	Late 24-Hour Report	\$2,203.08	\$500.00	10/16/20
Revive Hometown Maine PAC	Late October Quarterly	\$510.00	\$250.00	10/30/20
 				
Mainers for Health and Parental Rights	Late 24-Hour Report	\$980.00	\$750.00	01/27/21
Kittery Democratic Committee	Late 11-Day Pre-General Report	\$500.00	\$100.00	02/24/21
Madison Republican Committee of Maine	Late 11-Day Pre-General Report	\$500.00	\$100.00	02/24/21
York Town Republican Committee	Late 11-Day Pre-General Report	\$500.00	\$100.00	02/24/21
Energy PAC for Maine	Late 24-Hour Report	\$8,840.00	\$750.00	03/31/21
Protect Maine Elections	Late Initial Report	\$1,004.00	\$750.00	10/29/21
 				
Mainers for Local Power PAC	Late 24-Hour Report	\$300,000.00	\$25,000.00	02/28/22
Mainers for Local Power PAC	Late 24-Hour Report	\$98,500.00	\$10,000.00	02/28/22
No on 3: Right to Food is Wrong for Maine	Late 24-Hour Report (3)	\$932.00	\$300.00	02/28/22
Piscataquis County Republican Committee	Late January Semiannual Report	\$500.00	\$100.00	03/30/22
Waldo County Democratic Committee	2022 July Semiannual Report	\$181.21	\$60.40	09/28/22
Lincoln County Republican Committee	2022 July Semiannual Report	\$500.00	\$100.00	09/28/22
American Leadership Committee-Maine PAC	Late IE report Oct. Quarterly Report	\$679.88	\$679.88	11/30/22
Planned Parenthood Maine Action Fund	Late IE report	\$2,433.60	\$750.00	11/30/22
We the People PAC	Late IE report	\$5,000.00	\$1,000.00	11/30/22
We the People PAC	Late IE report	\$99.96	\$99.96	11/30/22
Steve LaFreniere	Late IE Report	\$1,090.00	\$200.00	12/21/22
York Voter Alliance	Late IE report	\$672.61	\$200.00	12/21/22
Androscoggin County Democratic Committee	Late 11-Day Pre-General Report	\$99.94	\$99.94	12/21/22
 				
Aroostook County Republican Committee	Late 11-Day Pre-General Report	\$500.00	\$100.00	01/30/23
Aroostook County Republican Committee	Late 24-Hour Report	\$120.00	\$120.00	01/30/23
Maine AFL-CIO Committee on Political Education PAC	Late 24-Hour Report	\$4,860.00	\$750.00	02/28/23
Maine United Auto Workers Council PAC	Two Late 24-Hour Reports	\$4,900.00	\$1,000.00	02/28/23

Late Major Contributor Decisions (2020 - present)				
Committee Name	Violation	Preliminary Penalty	Final Penalty	Commission Meeting Date
Waiver requests				
Mainers for Local Power PAC	Late Major Contributor (2)	\$53,431.15	\$2,500.00	03/10/20
Maine Street Solutions - Protect Schools BQC	Late Major Contributor	\$25,000.00	\$2,000.00	05/27/20
Clean Energy Matters PAC	Late Major Contributor Notice	\$50,000.00	\$2,500.00	03/31/21
We the People PAC	Late Major Contributor Notice	\$11,500.00	\$2,500.00	05/26/21
Mainers for Local Power PAC	Late Major Contributor Notice	\$13,786.32	\$2,500.00	08/23/21
Other Enforcement Decisions - Committees (2018 - present)				
Committee Name	Violation	Preliminary Penalty	Final Penalty	Commission Meeting Date
Other Violations				
Sara Gideon Leadership PAC	Contributions Made in Name of Another		\$500.00	10/30/19
Working Families PAC	Failure to file 2020 October Quarterly; 11-Day Pre-General, 42-Day Post-General, and 2021 January Quarterly and April Quarterly campaign finance reports		\$3,750.00	05/26/21
Mainers for Fair Laws BQC	Missing Disclaimers in television ads		\$2,500.00	09/29/21
Working Families PAC	Over the limit contribution to Diane Russell senate campaign		\$285.00	09/29/21
American Leadership Committee-Maine PAC	Missing top three donors		\$10,000.00	11/30/22

§1003. Investigations by commission

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

- A. Delivering a duly executed copy of the notice to the person to be served or to a partner or to any officer or agent authorized by appointment or by law to receive service of process on behalf of that person; [PL 2013, c. 162, §1 (NEW).]
- B. Delivering a duly executed copy of the notice to the principal place of business in this State of the person to be served; or [PL 2013, c. 162, §1 (NEW).]
- C. Mailing by registered or certified mail a duly executed copy of the notice, addressed to the person to be served, to the person's principal place of business. [PL 2013, c. 162, §1 (NEW).]
[PL 2013, c. 162, §1 (AMD).]

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.
[PL 2011, c. 389, §4 (AMD).]

2-A. Confidentiality.
[PL 2001, c. 535, §1 (RP).]

3. State Auditor. The State Auditor shall assist the commission in making investigations and in other phases of the commission's duties under this chapter, as requested by the commission, and has all necessary powers to carry out these responsibilities.
[PL 1999, c. 426, §31 (AMD).]

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

- A. Financial information not normally available to the public; [PL 2007, c. 571, §6 (NEW).]
- B. Information that, if disclosed, would reveal sensitive political or campaign information belonging to a party committee, political action committee, ballot question committee, candidate or candidate's political committee, or other person who is the subject of an audit, investigation or other enforcement matter, even if the information is in the possession of a vendor or 3rd party; [PL 2013, c. 470, §1 (AMD).]
- C. Information or records subject to a privilege against discovery or use as evidence; and [PL 2007, c. 571, §6 (NEW).]
- D. Intra-agency or interagency communications related to an audit or investigation, including any record of an interview, meeting or examination. [PL 2013, c. 470, §1 (AMD).]

§1052. Definitions**(CONTAINS TEXT WITH VARYING EFFECTIVE DATES)**

As used in this subchapter, unless the context otherwise indicates, the following terms have the following meanings. [PL 1985, c. 161, §6 (NEW).]

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; [PL 2011, c. 389, §26 (AMD).]

B. A direct initiative of legislation under the Constitution of Maine, Article IV, Part Third, Section 18; [PL 2011, c. 389, §26 (AMD).]

C. An amendment to the Constitution of Maine under Article X, Section 4; [PL 1985, c. 161, §6 (NEW).]

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; [PL 2011, c. 389, §26 (AMD).]

E. The ratification of the issue of bonds by the State or any agency thereof; and [PL 1989, c. 504, §§21, 31 (AMD).]

F. Any county or municipal referendum. [PL 1995, c. 483, §17 (AMD).]
[PL 2011, c. 389, §26 (AMD).]

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.
[PL 2021, c. 217, §3 (AMD).]

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.
[PL 2021, c. 217, §3 (NEW).]

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; [PL 2021, c. 217, §3 (AMD).]

A-1. Any funds deposited or transferred into the campaign account described in section 1054; [PL 2021, c. 217, §3 (NEW).]

B. A contract, promise or agreement, expressed or implied, whether or not legally enforceable, to make a contribution to a committee; [PL 2021, c. 217, §3 (AMD).]

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 [PL 2021, c. 217, §3 (AMD).]

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. [PL 2021, c. 217, §3 (AMD).]

"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. [PL 2021, c. 217, §3 (AMD).]

3-A. Exempt donor. "Exempt donor" means a person that has not received contributions for the purpose of influencing a campaign in the prior 2 years and whose only payments of money to influence a campaign in the prior 2 years are:

A. Contributions of money to candidates, party committees, political action committees or ballot question committees registered with the commission or a municipality; or [PL 2021, c. 217, §3 (NEW).]

B. Payments for goods or services with an aggregate value of no more than \$100,000 contributed to candidates, party committees, political action committees or ballot question committees registered with the commission or a municipality. [PL 2021, c. 217, §3 (NEW).]

[PL 2021, c. 217, §3 (NEW).]

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 [PL 2021, c. 217, §3 (AMD).]

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. [PL 2021, c. 217, §3 (AMD).]

[PL 2021, c. 217, §3 (AMD).]

4-A. Influence. "Influence" means to promote, support, oppose or defeat.
[PL 2011, c. 389, §30 (NEW).]

4-B. Initiate. "Initiate" includes the collection of signatures and related activities to qualify a state or local initiative or referendum for the ballot.
[PL 2011, c. 389, §31 (NEW).]

4-C. (TEXT EFFECTIVE UNTIL 1/01/23) Leadership political action committee. "Leadership political action committee" means a political action committee, other than a caucus political action committee under section 1053-C, that was directly or indirectly established by a current member of the Legislature or that is directly or indirectly maintained or controlled by a current member of the Legislature.
[PL 2021, c. 217, §3 (NEW).]

4-C. (TEXT EFFECTIVE 1/01/23) Leadership political action committee. "Leadership political action committee" means a political action committee, other than a caucus political action committee under section 1053-C, that was directly or indirectly established by a current member of the Legislature or that is directly or indirectly maintained or controlled by a current member of the Legislature.
[PL 2021, c. 217, §3 (NEW); PL 2021, c. 274, §9 (NEW); PL 2021, c. 274, §13 (AFF).]

5. Political action committee. The term "political action committee":

A. Includes:

(1) Any separate or segregated fund established by any corporation, membership organization, cooperative or labor or other organization that receives contributions or makes expenditures aggregating more than \$2,500 in a calendar year for the purpose of influencing the nomination or election of a candidate to political office; and

(5) Any person, including any corporation or association, other than an individual, that receives contributions or makes expenditures aggregating more than \$2,500 in a calendar year for the purpose of influencing the nomination or election of any candidate to political office; and [PL 2021, c. 217, §3 (AMD).]

B. Does not include:

(1) A candidate or a candidate's treasurer under section 1013-A, subsection 1;

(2) A candidate's authorized political committee under section 1013-A, subsection 1, paragraph B;

(3) A party committee under section 1013-A, subsection 3; or

(4) An exempt donor. [PL 2021, c. 217, §3 (AMD).]

[PL 2021, c. 217, §3 (AMD).]

§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. [PL 2021, c. 217, §10 (AMD).]

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. [PL 2019, c. 323, §24 (AMD).]

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. [PL 2019, c. 323, §24 (AMD).]

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. [PL 2019, c. 323, §24 (AMD).]

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. [PL 1991, c. 839, §29 (RPR).]

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. [PL 2019, c. 323, §24 (AMD).]

§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: [PL 2021, c. 217, §11 (AMD).]

1. Identification of candidates. The names of and offices sought by all candidates whose campaigns the committee supports or intends to influence; [PL 2021, c. 217, §11 (AMD).]

2. Identification of committees; parties. The names of all political committees or party committees supported in any way by the committee; [PL 2021, c. 217, §11 (AMD).]

3. Identification of ballot question campaigns. The ballot question campaigns that the committee intends to initiate or influence; [PL 2021, c. 217, §11 (AMD).]

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; [PL 2021, c. 217, §11 (AMD).]

5. Aggregate expenditures. [PL 2021, c. 217, §11 (RP).]

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; [PL 2021, c. 217, §11 (AMD).]

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 [PL 2021, c. 217, §11 (NEW).]

7. Other payments. Operational expenses and any other payments made from the campaign account described in section 1054. [PL 2021, c. 217, §11 (AMD).]

SECTION HISTORY

PL 1985, c. 161, §6 (NEW). PL 1991, c. 839, §§30,31 (AMD). PL 1991, c. 839, §33 (AFF). PL 2003, c. 615, §§3,4 (AMD). PL 2005, c. 301, §27 (AMD). PL 2005, c. 575, §8 (AMD). PL 2007, c. 443, Pt. A, §36 (AMD). PL 2007, c. 477, §§6, 7 (AMD). PL 2009, c. 190, Pt. A, §§25, 26 (AMD). PL 2011, c. 389, §§46-48 (AMD). PL 2015, c. 408, §6 (AMD). PL 2019, c. 563, §§14-16 (AMD). PL 2021, c. 217, §11 (AMD).

§1062-A. Failure to file on time

1. Registration. A political action committee required to register under section 1052-A, 1053-A or 1053-B or a ballot question committee required to register under section 1053-A or 1056-B that fails to do so or that fails to provide the information required by the commission for registration may be assessed a fine of no more than \$2,500. In assessing a fine, the commission shall consider, among other things, whether the violation was intentional, the amount of campaign and financial activity that occurred before the committee registered, whether the committee intended to conceal its campaign or financial activity and the level of experience of the committee's volunteers and staff. [PL 2019, c. 563, §18 (AMD).]

2. Campaign finance reports. A campaign finance report is not timely filed unless a properly signed or electronically submitted copy of the report, substantially conforming to the disclosure requirements of this subchapter, is received by the commission by 11:59 p.m. on the date it is due. Except as provided in subsection 6, the commission shall determine whether a required report satisfies the requirements for timely filing. The commission may waive a penalty in whole or in part if it is disproportionate to the level of experience of the person filing the report or to the harm suffered by the public from the late disclosure. The commission may waive the penalty in whole or in part if the commission determines the failure to file a timely report was due to mitigating circumstances. For purposes of this section, "mitigating circumstances" means:

A. A valid emergency of the committee treasurer determined by the commission, in the interest of the sound administration of justice, to warrant the waiver of the penalty in whole or in part; [PL 1999, c. 729, §9 (AMD).]

B. An error by the commission staff; or [PL 1999, c. 729, §9 (AMD).]

C. Other circumstances determined by the commission that warrant mitigation of the penalty, based upon relevant evidence presented that a bona fide effort was made to file the report in accordance with the statutory requirements, including, but not limited to, unexplained delays in postal service or interruptions in Internet service. [PL 2007, c. 443, Pt. A, §38 (AMD).]

[PL 2009, c. 190, Pt. A, §29 (AMD).]

3. Basis for penalties. The penalty for late filing of a report required under this subchapter is a percentage of the total contributions or expenditures for the filing period, whichever is greater, multiplied by the number of calendar days late, as follows:

A. For the first violation, 2%; [IB 2015, c. 1, §9 (AMD).]

B. For the 2nd violation, 4%; and [IB 2015, c. 1, §9 (AMD).]

C. For the 3rd and subsequent violations, 6%. [IB 2015, c. 1, §9 (AMD).]

Any penalty of less than \$10 is waived.

Violations accumulate on reports with filing deadlines in a 2-year period that begins on January 1st of each even-numbered calendar year. Waiver of a penalty does not nullify the finding of a violation.

A report required to be filed under this subchapter that is sent by certified or registered United States mail and postmarked at least 2 days before the deadline is not subject to penalty.

A required report may be provisionally filed by transmission of a facsimile copy of the duly executed report to the commission, as long as an original of the same report is received by the commission within 5 calendar days thereafter.

[IB 2015, c. 1, §9 (AMD).]

4. Maximum penalties. The maximum penalty under this subchapter is \$10,000 for reports required under section 1053-A, 1056-B or 1059, except that if the dollar amount of the financial activity that was not timely filed or did not substantially conform to the reporting requirements of this

subchapter exceeds \$50,000, the maximum penalty is 100% of the dollar amount of that financial activity.

[PL 2019, c. 563, §19 (AMD).]

5. Request for a commission determination. If the commission staff finds that a committee has failed to file a report required under this subchapter, the commission staff shall mail a notice to the treasurer of the committee within 3 business days following the filing deadline informing the treasurer that a report was not received. If a committee files a report required under this subchapter late, a notice of preliminary penalty must be forwarded to the treasurer of the committee whose report is not received by 11:59 p.m. on the deadline date, informing the treasurer of the commission staff finding of violation and preliminary penalty calculated under subsection 3 and providing the treasurer with an opportunity to request a determination by the commission. A request for determination must be made within 14 calendar days of receipt of the commission's notice. A principal officer or treasurer requesting a determination may either appear in person or designate a representative to appear on the principal officer's or treasurer's behalf or submit a sworn statement explaining the mitigating circumstances for consideration by the commission. A final determination by the commission may be appealed to the Superior Court in accordance with Title 5, chapter 375, subchapter 7 and the Maine Rules of Civil Procedure, Rule 80C.

[PL 2019, c. 563, §20 (AMD).]

6. Final notice of penalty. After a commission meeting, notice of the final determination of the commission and the penalty, if any, imposed pursuant to this subchapter must be sent to the principal officer and the treasurer of the committee.

If a determination is not requested, the preliminary penalty calculated by the commission staff is final. The commission staff shall mail final notice of the penalty to the principal officer and to the treasurer of the committee. A detailed summary of all notices must be provided to the commission.

[PL 2019, c. 563, §21 (AMD).]

7. List of late-filing committees. The commission shall prepare a list of the names of committees that are late in filing a report required under section 1059, subsection 2, paragraph B, subparagraph (1) or section 1059, subsection 2, paragraph C or D within 30 days of the date of the election and shall make that list available for public inspection.

[PL 2019, c. 563, §22 (AMD).]

8. Failure to file. A person who fails to file a report as required by this subchapter within 30 days of the filing deadline is guilty of a Class E crime, except that, if a penalty pursuant to subsection 8-A is assessed and collected by the commission, the State may not prosecute a violation under this subsection.

[PL 2003, c. 628, Pt. A, §8 (AMD).]

8-A. Penalties for failure to file report. The commission may assess a civil penalty for failure to file a report required by this subchapter. The maximum penalty for failure to file a report required under section 1056-B or section 1059 is \$10,000 or the amount of financial activity not reported, whichever is greater.

[IB 2015, c. 1, §11 (AMD).]

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

[PL 2009, c. 302, §10 (RPR).]

SECTION HISTORY

PL 1995, c. 483, §21 (NEW). PL 1999, c. 426, §34 (AMD). PL 1999, c. 729, §9 (AMD). PL 2003, c. 628, §§A7-9 (AMD). PL 2007, c. 443, Pt. A, §§38-41 (AMD). PL 2009, c. 190, Pt. A, §§28-31 (AMD). PL 2009, c. 302, §§8-10 (AMD). PL 2011, c. 389, §49 (AMD). PL 2013, c.