



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

To: Commissioners  
From: Jonathan Wayne, Executive Director  
Date: January 20, 2025  
Re: Save Maine Absentee Voting – Request for Waiver of Late-Filing Penalty

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During the last 13 days before an election, a ballot question committee must file a special campaign finance report within 24 hours of receiving any single contribution of \$5,000 or more or making any expenditure of \$1,000 or more. The 24-hour reporting requirement provides the public with notice of large transactions that otherwise wouldn't be reported until 42 days after the election.

Save Maine Absentee Voting is a ballot question committee formed by a group of organizations that opposed Question 1 on the November 4, 2025 ballot, which was a citizen initiative to restrict absentee voting and require photo ID for voting. The ballot question committee acknowledges that it was late filing a 24-hour report (due October 23, 2025) of an in-kind contribution of paid staff time by a Maine nonprofit. It requests a waiver of the preliminary \$10,000 late-filing penalty. The Commission staff recommends reducing the penalty to \$500 because the committee has made plausible arguments that the late filing was due to a good-faith mistake and caused less informational harm to the public than in other cases.

## LEGAL REQUIREMENTS

24-Hour Reports. During the 13 days before an election ballot question committees are required to report within 24 hours any single contribution of \$5,000 or more received or single expenditure of \$1,000 or more made. 21-A M.R.S. § 1059(2)(E). If the ballot question committee is late in filing the 24-hour report, the statutory amount of the preliminary penalty is determined by the amount of the transaction, the number of prior violations within a two-year period, and the number of days late. 21-A M.R.S. § 1062-A(3). The Commission may grant a full or partial waiver if it determines that the report was late due to mitigating circumstances defined in statute or is disproportionately high relative to certain factors. 21-A M.R.S. § 1062-A(2).

## DISCUSSION AND STAFF RECOMMENDATION

Save Maine Absentee Voting (“SMAV”) registered with the Commission as a ballot question committee in February 2025. Throughout 2025, the committee reported receiving regular in-kind contributions of paid staff time from a nonprofit, Maine Voices Network. The first in-kind contribution was dated February 13, 2025. Subsequent contributions were dated two weeks apart. The contributions appeared in the committee’s initial report filed February 27, 2025 and in quarterly campaign finance reports filed in April, July, and October. In its waiver request, SMAV provided the following chart of reported in-kind contributions of staff time from the Maine Voices Network.

Name	Amount of In-kind	Description of In-kind	Date / Ending Pay Period	Ethics Report Listed	Reporting Period	Date Filed
Maine Voices Network	\$ 333.28	Staff time for administration and planning	02/13/25	Initial Report	01/01/25 - 02/21/25	02/27/25
Maine Voices Network	\$ 1,033.18	Staff time for strategy and planning	02/26/25	April Quarterly Report	02/22/25 - 03/31/25	04/09/25
Maine Voices Network	\$ 1,773.06	Staff time for strategy and planning	03/12/25	April Quarterly Report	02/22/25 - 03/31/25	04/09/25
Maine Voices Network	\$ 1,497.63	Staff time for strategy and planning	03/26/25	April Quarterly Report	02/22/25 - 03/31/25	04/09/25
Maine Voices Network	\$ 2,995.33	Staff time for admin, strategy, comms	04/09/25	July Quarterly Report	04/01/25 - 06/30/25	07/15/25
Maine Voices Network	\$ 3,474.45	Staff time for admin, strategy, comms	04/23/25	July Quarterly Report	04/01/25 - 06/30/25	07/15/25
Maine Voices Network	\$ 7,138.49	Staff time for admin, strategy, comms	05/07/25	July Quarterly Report	04/01/25 - 06/30/25	07/15/25
Maine Voices Network	\$ 4,572.83	Staff time for admin, strategy, comms	05/21/25	July Quarterly Report	04/01/25 - 06/30/25	07/15/25
Maine Voices Network	\$ 3,485.33	Staff time for admin, strategy, comms	06/04/25	July Quarterly Report	04/01/25 - 06/30/25	07/15/25
Maine Voices Network	\$ 4,915.10	Staff time for admin, strategy, comms	06/18/25	July Quarterly Report	04/01/25 - 06/30/25	07/15/25
Maine Voices Network	\$ 2,824.37	Staff time for admin, strategy, comms	07/02/25	October Quarterly Report	07/01/25 - 09/30/25	10/06/25
Maine Voices Network	\$ 5,423.64	Staff time for admin, strategy, comms	07/16/25	October Quarterly Report	07/01/25 - 09/30/25	10/06/25
Maine Voices Network	\$ 6,860.37	Staff time for admin, strategy, comms	07/30/25	October Quarterly Report	07/01/25 - 09/30/25	10/06/25
Maine Voices Network	\$ 6,811.57	Staff time for admin, strategy, comms	08/13/25	October Quarterly Report	07/01/25 - 09/30/25	10/06/25
Maine Voices Network	\$ 6,103.88	Staff time for admin, strategy, comms	08/27/25	October Quarterly Report	07/01/25 - 09/30/25	10/06/25
Maine Voices Network	\$ 7,433.59	Staff time for admin, strategy, comms	09/10/25	October Quarterly Report	07/01/25 - 09/30/25	10/06/25
Maine Voices Network	\$ 10,533.04	Staff time for admin, strategy, comms	09/24/25	October Quarterly Report	07/01/25 - 09/30/25	10/06/25
Maine Voices Network	\$ 12,673.95	Staff time for admin, strategy, comms	10/08/25	11-Day Pre-Election Report	10/01/25 - 10/21/25	10/24/25
Maine Voices Network	\$ 11,054.83	Staff time for admin, strategy, comms	10/22/25	42-Day Post-General Report	10/22/25 - 12/09/25	12/15/25
Maine Voices Network	\$ 13,958.82	Staff time for admin, strategy, comms	11/05/25	42-Day Post-General Report	10/22/25 - 12/09/25	12/15/25

SMAV acknowledges that it should have filed a 24-hour report for the October 22, 2025 contribution of staff time. The committee realized its mistake when preparing the 42-Day Post-General Election Report in December 2025. It contacted Commission staff and filed the report 54 days late. Commission staff sent SMAV a letter notifying the committee that the preliminary late-filing penalty was the maximum of \$10,000. The preliminary penalty was calculated based on these factors (without the \$10,000 maximum, the preliminary penalty would have been a little less than \$12,000):

Report Name	Activity Amount	Due Date	Days Late	Penalty Rate	Penalty
24-Hour Report	\$11,054.83	10/23/2025	54	2%	\$10,000

In its waiver request, SMAV acknowledges that it should have filed a 24-hour report for the October 22, 2025 in-kind contribution of \$11,054.83 of staff time. The committee says it takes full responsibility for the late filing and explains it misunderstood an exception to the 24-hour reporting requirement.

Under this exception, if a ballot question committee reports regular expenditures to a payee for staff time, the ballot question committee does not need to file a 24-hour report for any such expenditure that occurs during the 13 days before the election. 21-A M.R.S. § 1059(2)(E). The rationale is that the public already has received notice that the committee is regularly making expenditures to this payee for staff time.

SMAV explains that it was aware of this exception for reportable *expenditures* for staff time and erroneously extrapolated the exception to cover *in-kind contributions received* of staff time. Consequently, SMAV believed it didn't need to file a 24-Hour Report on October 23, 2025

SMAV requests a waiver of the \$10,000 penalty because the late filing was inadvertent and the result of human error, and the ultimate harm to the public was minimal because the public already had been made aware of the committee's receipt of repeated and ongoing contributions of staff time from Maine Voices Network.

Violations of the 24-hour reporting requirements can be serious matters, as these reports play an important role in informing the electorate about how money is changing hands in the critical days just before an election. Since April 2018, the Commission has generally assessed a final penalty of \$750 or more for routine, unintentional late-filing violations by PACs and ballot question committees with some reductions for good cause. In this case, the Commission staff believes SMAV has offered a plausible, good-faith explanation for why it didn't file the 24-hour report on time and why the public harm was less in this case compared to other late reports. Commission staff recommends that this penalty be reduced to \$500. If the Commission is not persuaded by the mitigating circumstances offered by SMAV, as a secondary recommendation we would suggest a reduction to \$750.



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

**Sent via Email and US Mail**

December 22, 2025

Beth Allen, Treasurer  
Save Maine Absentee Voting  
411 Congress Street  
Portland, ME 04101

Re: Notice of Late Filing of 24-Hour Report and Preliminary Penalty

Dear Beth Allen:

The Commission on Governmental Ethics and Election Practices (the "Commission") staff found that the Save Maine Absentee Voting ballot question committee (the "committee") was late in filing its 24-Hour Report of Contributions and Expenditures (the "report"). Although the report was due by 11:59 p.m. on October 23, 2025, it was not filed until December 16, 2025.

Per 21-A M.R.S. § 1020-A, the late filing of the report triggers an enforcement process. Based on the amount of financial activity in the report, the number of calendar days the report was late, and any history of violations by the committee, the Commission staff determined the preliminary penalty for this violation is \$11,938.86; however, 21-A M.R.S. § 1062-A(4) caps the penalty at \$10,000 (see calculation matrix and related notes on next page). Please note that if between the date of this notice and December 31, 2025, the committee files another report that is late, the penalty percentage increases from 2% to 4% (see next page).

If you disagree with the preliminary penalty, the committee may submit to the Commission a written request for a waiver or reduction of the preliminary penalty (an "appeal"). An appeal request must be made within 14 calendar days of your receipt of this notice. The appeal request must include a full explanation of the reasons the committee filed its report late. Upon receiving your request for an appeal, the Commission staff will schedule the hearing of your appeal for an upcoming Commission meeting.

The Commission may waive or reduce the penalty if it determines the report was late due to mitigating circumstances, which are defined as: (1) a valid emergency; (2) an error made by the Commission staff; or (3) relevant evidence the committee made a bona fide effort to file the report on time. Also, the Commission may waive or reduce the penalty if it is disproportionate to the level of experience of the person filing the report or the harm suffered by the public from the late disclosure.

Please see the next page for instructions on how to pay the penalty.

Sincerely,

A handwritten signature in blue ink that reads "Heidi Hoefler".

Heidi Hoefler  
Political Committee & Lobbyist Registrar

**Committee Name:** Save Maine Absentee Voting (BQC)  
**Prior Violations:** 0

Report Name	Activity Amount	Due Date	Days Late	Penalty Rate	Penalty**
24-Hour Report of Contributions and Expenditures	\$11,054.83	10/23/2025	54	2%	\$10,000**

**\*\*Although the actual penalty is \$11,938.86, 21-A M.R.S. §1062-A(4) caps the penalty at \$10,000.**

The statutory amount of the preliminary penalty is determined by the greater of total contributions or expenditures for the reporting period, multiplied by a percentage based on the number of violations in a 2-year period that resets on January 1 of each even-numbered year (see below), multiplied by the number of calendar days the report was late.

For the first violation, 2%

For the second violation, 4%

For the third and each subsequent violation, 6%

**A penalty begins to accrue at 11:59 p.m. on the day the report is due.**

As noted above, violations accumulate on reports filed late in the 2-year period that begins on January 1st of each even-numbered year. The waiver or reduction of a penalty does not nullify the finding of a violation for the purpose of calculating a penalty.

To make a payment, within 14 days of the date of this notice please either mail a check payable to "Treasurer, State of Maine" to us at 135 State House Station, Augusta, ME 04333-0135 or pay online at [www.maine.gov/ethics](http://www.maine.gov/ethics) by selecting the "Penalty Payment" button at the bottom right of the web page.



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

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

January 9, 2026

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

**RE: Save Maine Absentee Voting – Penalty Waiver Request**

Dear Ms. Hoefler,

On behalf of our client, Save Maine Absentee Voting (SMAV), and pursuant to 21-A M.R.S.A. § 1062-A(5), we write to request a waiver of the preliminary penalties issued by the Commission staff for incomplete/late filing of an October 2025 24-Hour Report of Contributions and Expenditures (the “report”). While SMAV takes full responsibility for the filing error that led to an in-kind contribution of staff time not being reported within 24 hours, the mistake outlined below was inadvertent and the result of simple human error. The ultimate harm to the public was minimal and SMAV self-reported to the Commission staff as soon as the error was discovered.

**FACTUAL SUMMARY**

SMAV is a Ballot Question Committee (“BQC”) formed in February of 2025 to oppose Question 1. As documented on the website, <https://saveabsentee.me>, the SMAV coalition was a diverse, nonpartisan group of organizations from across Maine.

Among the ways that individuals and organizations demonstrated their support for SMAV’s mission was to contribute their staff time to the campaign, essentially lending people to work on the SMAV effort. Under 21-A M.R.S. § 1012(2)(A)(4), in-kind staff time is a contribution because it is, “payment, by any person other than . . . a political committee, of compensation for the personal services of other persons that are provided to the . . . political committee without charge for any such purpose.” We note that the BQC Guidebook includes staff time as a commonly overlooked contribution. In this instance, SMAV tracked and reported substantial in-kind contributions as part of its compliance effort, including staff time.

Maine Voices Network (MVN), one of the founding organizations of SMAV disclosed on the registration, reported its in-kind staff time consistently throughout the campaign in required filings beginning with the February 27, 2025 Initial Report. Beth Allen is an employee of MVN who agreed to serve as Treasurer for the BQC. Ms. Allen has no previous experience serving as Treasurer for either a PAC or BQC.

Below, please find a chart of all the in-kind time contributed by MVN to SMAV. The time at issue here is highlighted in yellow:

Name	Amount of In-kind	Description of In-kind	Date / Ending Pay Period	Ethics Report Listed	Reporting Period	Date Filed
Maine Voices Network	\$ 333.28	Staff time for administration and planning	02/13/25	Initial Report	01/01/25 - 02/21/25	02/27/25
Maine Voices Network	\$ 1,033.18	Staff time for strategy and planning	02/26/25	April Quarterly Report	02/22/25 - 03/31/25	04/09/25
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Maine Voices Network	\$ 3,474.45	Staff time for admin, strategy, comms	04/23/25	July Quarterly Report	04/01/25 - 06/30/25	07/15/25
Maine Voices Network	\$ 7,138.49	Staff time for admin, strategy, comms	05/07/25	July Quarterly Report	04/01/25 - 06/30/25	07/15/25
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Maine Voices Network	\$ 11,054.83	Staff time for admin, strategy, comms	10/22/25	42-Day Post-General Report	10/22/25 - 12/09/25	12/15/25
Maine Voices Network	\$ 13,958.82	Staff time for admin, strategy, comms	11/05/25	42-Day Post-General Report	10/22/25 - 12/09/25	12/15/25

## REPORT ERROR AND ACTION TAKEN

The entry for the Oct. 22 in-kind contribution listed above fell on the first day of the 42-Day Post-General Reporting period and the first day of 24-Hour Reporting period, thirteen days before the November 4, 2025 Election Day. Under 21-A M.R.S. § 1059(1)(E), any contribution of \$5,000 or more made after the fourteenth day before an election and more than 24 hours before 5:00 p.m. on Election Day is to be reported within 24 hours. As such, SMAV should have filed a 24-Hour Report for Oct. 22, 2025 in-kind contribution of MVN staff time on October 23, 2025. SMAV did not file 24-hour report for the in-kind staff time, believing it would be properly disclosed in its post election report.

In an unfortunate mistake, SMAV confused the rule found under 21-A M.R.S. § 1059(1)(E), that ongoing previously disclosed *expenses*, including staff time, are not subject to 24-Hour Reporting. As such, SMAV staff failed to elevate the ongoing, previously disclosed in-kind *contribution* of MVN's staff time for 24-Hour reporting. By way of illustration, if SMAV paid the staff directly throughout the campaign, no 24-hour reporting would be required. However, because MVN was donating that same staff time to SMAV, such reports were required. In fact, because of the nature of the in-kind contribution and the error, SMAV did not request documentation from MVN for any in-kind staff time until the next reporting period. The

error was not discovered until preparation for the 42-Day Post-General Report on December 16, 2025.

Upon discovery on December 16, SMAV compliance counsel contacted Ethics Commission Staff. Staff helpfully researched the issue and confirmed the proper application of the rule in question. The 24-Hour Report was then filed on December 16, 2025 simultaneously with the 42-Day Post-General Report because of Registrar Hoefler's efforts.

SMAV itself and we, as compliance counsel, recognize that the best practice recommended by Commission Staff is to enter all new transactions daily during the 24-Hour Report Period. However, in this case, when the in-kind contribution is payroll information gathered from the coalition rather than a contribution received in the traditional sense, implementation of that best practice needs to be improved.

SMAV takes responsibility for its genuine error. The missed 24-Hour report stems from simple human error – misunderstanding when the staff time exception to 24-Hour Reporting applies. SMAV concedes that best practice is to ask Ethics staff or legal counsel when in doubt about whether an exception applies and that the best practice is to enter *all* transactions daily.

When the error was discovered, SMAV immediately contacted Ethics Staff because it is the intention of the BQC officers to comply with Maine's election laws and work with the Ethics Commission to ensure compliance.

Though SMAV takes full responsibility for the errors, it also believes that a fine of \$10,000 is vastly disproportionate to the nature of the mistake made and the experience of the Treasurer. The above error did not impact the outcome of an election and did not involve surprise end-of-campaign spending. While certainly conceding the error, SMAV does not believe that the public was harmed by not seeing 24-hour reports disclosing this on-going spending. Again, these were repeated and ongoing staff expenditures of which the public had already been made aware. SMAV strongly believes that the harm suffered to the public is not commensurate with this fine. Accordingly, SMAV requests that this Commission significantly reduce the preliminary penalty amount to reflect the relative severity of the violations.

Finally, we note that 24-Hour Reporting remains a significant source of confusion and complication. Even some of the most compliant entities struggle to keep up with the burden of the statutory requirement. We appreciate the Commission's efforts on this front to simplify and system and ensure it aligns with policy goals without causing undue burden.

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Knox", with a stylized, cursive script.

Kate Knox  
Lisa Prosienski  
Counsel to Save Maine Absentee Voting





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](http://www.maine.gov/ethics)  
Phone: 207-287-4179  
Fax: 207-287-6775

## 24-HOUR REPORT OF CONTRIBUTIONS AND EXPENDITURES

### 2025 CAMPAIGN YEAR

COMMITTEE		TREASURER	
Save Maine Absentee Voting 411 Congress Street Portland, ME 04101 PHONE:(207) 380-9642 EMAIL: will@mainevotes.net		Ms. Beth Allen 411 Congress Street Portland, ME 04101 PHONE:(207) 812-8654 EMAIL: beth@mainevoicenesnetwork.org	
REPORT	DUE DATE	REPORTING PERIOD	
24 Hour Report for Contributions and Expenditures	10/23/2025	10/22/2025-10/22/2025	

### FINANCIAL ACTIVITY SUMMARY

CONTRIBUTIONS AND EXPENDITURES	
1. TOTAL CONTRIBUTIONS / LOANS	\$11,054.83
2. TOTAL EXPENDITURES	\$0.00
3. TOTAL DEBTS	\$0.00

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

REPORT FILED BY: Andrea Nadeau  
REPORT FILED ON: 12/18/2025 4:02:55 PM  
LAST MODIFIED:  
COMMITTEE ID: 507356

## 24-HOUR CONTRIBUTION INFORMATION

1 = Individual

2 = Candidate/ Spouse/ Domestic Partner

3 = Commercial Source

4 = Nonprofit Organization

5 = Political Action Committee

6 = Political Party Committee

7 = Ballot Question Committee

8 = Other Candidate/ Candidate Committee

9 = Candidate / Candidate Committee

10 = General Treasury Transfer

11 = Transfer from Previous Campaign

12 = Contributors giving \$50 or less

13 = Contributors giving \$100 or less

14 = Contributors giving \$200 or less

15 = MCEA Payment

16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	CONTRIBUTOR/ CONTRIBUTION TYPE	AMOUNT
10/22/2025	Maine Voices Network 565 Congress Street #200 Portland, ME, 04101		4 In-Kind (Itemized) Staff time for admin, strategy, comms	\$11,054.83
<b>TOTAL CONTRIBUTIONS / LOANS</b>				<b>\$11,054.83</b>

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

Committee Name	Requested Waivers of Late-Filing Penalties	Preliminary Penalty	Final Penalty	Commission Meeting Date
<b>Waiver Requests</b>				
Maine United Auto Workers PAC	Late January Quarterly	\$400.00	\$400.00	4/25/2018
Maine Health Care Assoc. PAC	Late 24-Hour Report	\$2,760.00	\$500.00	8/29/2018
Fecteau Leadership PAC	Late 24-Hour Report	\$400.00	\$400.00	8/29/2018
New Mainers PAC	Late 24-Hour Report	\$10,000.00	\$1,000.00	3/6/2019
Senate Democratic Campaign Committee	Late January Quarterly	\$1,010.50	\$750.00	4/24/2019
Unite Portland PAC ( <i>Municipal</i> )	Late IE Report	\$5,000.00	\$1,250.00	12/18/2019
Unite Portland PAC ( <i>Municipal</i> )	Late IE Report	\$2,052.16	\$750.00	12/18/2019
Women's Leadership Fund PAC	Late IE Report	\$100.00	\$50.00	8/11/2020
Maine Truck PAC	Late 24-Hour Report	\$2,203.08	\$500.00	10/16/2020
Revive Hometown Maine PAC	Late October Quarterly	\$510.00	\$250.00	10/30/2020
Mainers for Health and Parental Rights	Late 24-Hour Report	\$980.00	\$750.00	1/27/2021
Kittery Democratic Committee	Late 11-Day Pre-General Report	\$500.00	\$100.00	2/24/2021
Madison Republican Committee of Maine	Late 11-Day Pre-General Report	\$500.00	\$100.00	2/24/2021
York Town Republican Committee	Late 11-Day Pre-General Report	\$500.00	\$100.00	2/24/2021
Energy PAC for Maine	Late 24-Hour Report	\$8,840.00	\$750.00	3/31/2021
Protect Maine Elections	Late Initial Report	\$1,004.00	\$750.00	10/29/2021
Mainers for Local Power PAC	Late 24-Hour Report	\$300,000.00	\$25,000.00	2/28/2022
Mainers for Local Power PAC	Late 24-Hour Report	\$98,500.00	\$10,000.00	2/28/2022
No on 3: Right to Food is Wrong for Maine	Late 24-Hour Report (3)	\$932.00	\$300.00	2/28/2022
Piscataquis County Republican Committee	Late January Semiannual Report	\$500.00	\$100.00	3/30/2022
Waldo County Democratic Committee	2022 July Semiannual Report	\$181.21	\$60.40	9/28/2022
Lincoln County Republican Committee	2022 July Semiannual Report	\$500.00	\$100.00	9/28/2022
American Leadership Committee-Maine PAC	Late IE report Oct. Quarterly Report	\$679.88	\$679.88	11/30/2022
Planned Parenthood Maine Action Fund	Late IE report	\$2,433.60	\$750.00	11/30/2022
We the People PAC	Late IE report	\$5,000.00	\$1,000.00	11/30/2022
We the People PAC	Late IE report	\$99.96	\$99.96	11/30/2022
Steve LaFreniere	Late IE Report	\$1,090.00	\$200.00	12/21/2022
York Voter Alliance	Late IE report	\$672.61	\$200.00	12/21/2022
Androscoggin County Democratic Committee	Late 11-Day Pre-General Report	\$99.94	\$99.94	12/21/2022
Aroostook County Republican Committee	Late 11-Day Pre-General Report	\$500.00	\$100.00	1/30/2023
Aroostook County Republican Committee	Late 24-Hour Report	\$120.00	\$120.00	1/30/2023
Maine AFL-CIO Committee on Political Education PAC	Late 24-Hour Report	\$4,860.00	\$750.00	2/28/2023
Maine United Auto Workers Council PAC	Two Late 24-Hour Reports	\$4,900.00	\$1,000.00	2/28/2023
American Leadership Committee-Maine PAC	Late 42-Day Post-General Report	\$55,654.00	\$2,500.00	5/31/2023

We the People PAC	Late 11 day Pre-special election report	\$1,147.50	\$400.00	8/23/2023
Star City PAC	Late 11 day Pre-special election report	\$370.50	\$150.00	8/23/2023
Citizens for a Bright Future	Late Registration, late filing	\$3,866.00	\$250.00	5/29/2024
Citizens for a Bright Future	Missing Disclaimers on signs		\$50.00	5/29/2024
Planned Parenthood Maine Action Fund	Late IE Report	\$733.60	\$400.00	5/29/2024
Bangor Fire Fighters PAC Fund	Late to update their registration	\$250.00	\$0.00	5/29/2024
Maine Republican Party	2 Late 24-Hour Reports	\$38,839.80	\$3,000.00	9/25/2024
Friends of Maine Hospitals PAC	Late 24-Hour Report	\$900.00	\$500.00	9/25/2024
Local 349 PAC Fund	Substantially non-compliant 42-Day Post-Primary Report	\$1,369.00	\$500.00	9/25/2024
Maine Labor Climate PAC	Late 60-Day Pre-General IE Report	\$534.44	\$400.00	9/25/2024
Bright Future Maine PAC	Late 2-Day Pre-Primary IE	\$6,411.30	\$375.00	9/25/2024
Democrats of Kennebunk, Kennebunkport and Arundel	Late July Semi-Annual Report	\$500.00	\$100.00	10/30/2024
Bright Future Maine PAC	Late 24-Hour Report	\$2,800.00	\$1,000.00	12/18/2024
Cumberland County Republican Committee	Late IE Report	\$382.50	\$100.00	12/18/2024
FAM PAC	Late IE Report	\$365.40	\$365.40	12/18/2024
ActBlue Maine PAC	Late July Semi-Annual Report	\$683,731.00	\$100,000.00	9/24/2025
Protect ME – No Red Flag BQC	Late Registration	\$500.00	\$500.00	9/24/2025
<b>Late Major Contributor Decisions</b>				
Committee Name	Violation	Preliminary Penalty	Final Penalty	Commission Meeting Date
<b>Waiver requests</b>				
Mainers for Local Power PAC	Late Major Contributor (2)	\$53,431.15	\$2,500.00	3/10/2020
Maine Street Solutions - Protect Schools BQC	Late Major Contributor	\$25,000.00	\$2,000.00	5/27/2020
Clean Energy Matters PAC	Late Major Contributor Notice	\$50,000.00	\$2,500.00	3/31/2021
We the People PAC	Late Major Contributor Notice	\$11,500.00	\$2,500.00	5/26/2021
Mainers for Local Power PAC	Late Major Contributor Notice	\$13,786.32	\$2,500.00	8/23/2021
Maine Energy Progress	Late Major Contributor Notice	\$25,768.87	\$3,000.00	11/29/2023
Dorman Products	Late Major Contributor Report	\$15,000.00	\$5,000.00	11/29/2023
Maine Automotive Right to Repair	Late Major Contributor Notices (6)	\$240,000.00	\$35,000.00	11/29/2023
Genuine Parts Company	Late Major Contributor Report	\$50,000.00	\$5,000.00	1/31/2024
Our Power	Two Late Major Contributor Notices	\$28,155.08	\$6,000.00	2/27/2024
<b>Other Enforcement Decisions</b>				
Committee Name	Violation	Preliminary Penalty	Final Penalty	Commission Meeting Date
<b>Other Violations</b>				
Sara Gideon Leadership PAC	Contributions Made in Name of Another		\$500.00	10/30/2019
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	5/26/2021
Mainers for Fair Laws BQC	Missing Disclaimers in television ads		\$2,500.00	9/29/2021

Working Families PAC	Over the limit contribution to Diane Russell senate campaign		\$285.00	9/29/2021
American Leadership Committee-Maine PAC	Missing top three donors		\$10,000.00	11/30/2022
Building the Maine House	Late 11-day Pre-Primary Report		\$0.00	7/24/2024
Jake Ducharme	Missing Disclosures on Saviello signs		\$0.00	10/30/2024
Cape Says Yes to S	Missing Disclosure on advertisement		\$0.00	10/30/2024
Cape Elizabeth School Referendum	Missing Disclosure on advertisement		\$0.00	10/30/2024
Yes on 1/Freeport	Missing Disclosures on mailer		\$50.00	10/30/2024
Auburn Democratic City Committee	Missing Disclosure on advertisement		\$0.00	10/30/2024
Maine Senate Republican PAC	making an over-the-limit contribution		\$1,000.00	1/29/2025
Maine Senate Republican PAC	making a material false statement		\$0.00	1/29/2025
Senate Democratic Campaign Committee	inaccurate attribution & payment		\$159.50	1/29/2025
Aroostook County Democratic Committee	Missing address on disclosure message		\$0.00	9/24/2025
Aroostook County Democratic Committee	Missing paid for/authorized by message		\$0.00	9/24/2025

## **Legal Authority Cited in Memo for Waiver Request – Save Maine Absentee Voting**

### **21-A M.R.S. § 1059(2)(E)**

#### Chapter 13: Campaign Finance Reports

##### § 1059. Report; filing requirements

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

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.

### **21-A M.R.S. § 1062-A(2)**

#### Chapter 13: Campaign Finance Reports

##### § 1062-A. Failure to file on time

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;

B. An error by the commission staff; or

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.