



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

Commission Meeting 10/29/2021
Agenda Item #3

To: Commission
From: Michael Dunn, Esq.
Date: September 27, 2021
Re: Substantially Non-Conforming Lobbyist Disclosure Reports:
Garrett Mason for Associated Builders & Contractors of Maine (February)
Garrett Mason for Associated Builders & Contractors of Maine (July)
Garrett Mason for Association of Home Appliance Manufactures (May)
Garrett Mason for Association of Home Appliance Manufactures (June)
Keith Herrick for Pharmaceutical Care Management Association (April)
Keith Herrick for Pharmaceutical Care Management Association (May)

A lobbying firm, Dirigo Partners (“Dirigo”),¹ requests a waiver of six preliminary penalties totaling \$2,500. On September 10, 2021, Mr. Ben Grant informed Commission staff that he had made an error in filing lobbying reports, specifically, that he believed a lobbyist activity report (“Long Form”) was only required if the lobbying activity exceeded eight (8) hours in a calendar month, and that he had filed six no-activity reports (“Short Form”) for the months where the lobbying activity was below eight hours. The Commission staff informed him that he should amend those reports and disclose the activity. The Commission staff would review those amendments and make a preliminary determination if the reports were substantially non-conforming.²

In total, Dirigo Partners had failed to file six monthly lobbying reports that should have disclosed \$3,250 in compensation from lobbying and sixteen lobbied Legislative Actions (bills). Due to the amount of the omitted information, the Commission staff made the preliminary determination that the Reports were not compliant with the Chapter and imposed a penalty based on a late filed report (\$100 per month late). In total, the Commission staff made a preliminary penalty of \$2,500 in total for the six late filed reports. ETH. 4-21.

¹ The relevant members are Mr. Garrett Mason, Mr. Keith Herrick, and Mr. Ben Grant.

² The language used in the Lobbyist Disclosure law (title 3, chapter 15) is “[a] report as required by this chapter.” This Commission staff has interpreted this to mean that the report is considered timely filed if it substantially conforms to the requirements of the chapter (similar to late penalty provisions in campaign finance law, 21-A M.R.S. §§ 1020-A(2) & 1062-A(2)).

Dirigo requests a waiver of these penalties. ETH. 1. In its request, Dirigo indicates that Mr. Grant, who was responsible for filing these reports, was new to the lobby reporting requirements and that it was a sincere mistake. Upon realizing his mistake, he promptly contacted Commission staff and followed the staff's advice in amending the Reports.

LEGAL REQUIREMENTS

Lobbyist Report Requirements. Once a person has lobbied for a client for more than eight hours in a calendar month, the person is required to register as a lobbyist for that client. 3 M.R.S. § 313. All registered lobbyists are required to file monthly reports for each calendar month they are registered (even if no lobbying has occurred) containing the information required by 3 M.R.S. § 317. As an alternative to filing a blank reporting form, the Commission developed the short form report which is an affirmation that the lobbyist conducted no lobbying for the client during the month and did not engage in any of the other activities that must be included in a monthly report. ETH-4.

Reports are due 11:59 p.m. on the 15th day of the following month (*i.e.*, the June lobbying report is due July 15th). 3 M.R.S. § 317. Any person who fails to file a monthly report as required by title 3, chapter 15 may be assessed a penalty of \$100 for each month that the report is filed late. Id.

Common Nexus of Mistake. The Commission may treat multiple penalties as a single violation and make an appropriate reduction when a single mistake or misapplication of law results in multiple penalties. See, Mainers For Local Power Waiver Request (03/10/2020) (Late notices were given to two major contributors, Calpine and Vistra, because the PAC was unaware of the major contributor requirement. The Commission imposed a single \$2,500 penalty penalty); Jonathan Courtney Waiver Request (10/16/2020) (a lobbyist thought that he had filed monthly reports for two clients, but had not, and the Commission imposed one \$50 penalty).

LEGAL ANALYSIS AND STAFF RECOMMENDATION

This is a unique set of facts and the Commission precedent does not provide significant guidance. For late filed lobbyist reports, the Commission generally does not reduce penalties (keeping in mind that most penalties are either \$50 or \$100). The Commission may reduce penalties if there is a common nexus of mistake that multiplies the penalties. See, Jonathan Courtney Waiver Request (10/16/2020). These facts do not seem to fit neatly into either line of the Commission's precedent.

The Commission staff respectfully disagrees with Dirigo's argument regarding the inexperience of its staff. The Commission staff accepts that Mr. Grant is a new lobbyist associate and was responsible for filing the reports for the firm. However, Messrs Mason and Herrick have several years of filing lobbying reports each and were available to provide more training and oversight. Additionally, the guidance in the Lobbyist Guidebook (publicly available at Maine.gov/Ethics) clearly distinguishes between the long form and the short form. ETH. 25.

The Commission staff accepts that the preliminary penalty is disproportionate to the level of harm suffered by the public and that there was no intent to deceive the public. In fact, the firm came forward on its own volition when it realized the mistake in reporting. The Commission staff is of the opinion that the public benefits when regulated entities come forward with errors, and that the Commission should incentivize the disclosure of errors and prompt corrections. Additionally, the common nexus of mistake analysis is of limited use here because each report is assigned a different financial penalty due to how late the report was filed.

The Commission staff is of the opinion that a single financial penalty of \$300 should be assessed against the lobbyists (\$100 for each client). The public was significantly delayed in receiving information regarding \$3,250 in compensation earned to lobby their elected officials that the public had the right to access. The preliminary penalty would be reduced by 88%, in an area that the Commission rarely grants any type of reduction. This would seem to be a fair compromise between the good faith efforts by the firm and account for the public harm. Thank you for your attention in this matter.



September 16, 2021

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

Mr. Dunn,

I am writing to formally request a waiver of the penalty for the reports that I brought to your attention on Friday, September 10th.

The reports in question were filed as short forms when they should have been filed as long form reports. I was under the impression that if eight hours of lobbying was not accrued in a calendar month, a short form could be filed. As soon as I realized the reports were filed incorrectly, I immediately made attempts to correct them. In fact, the day I realized the error I went to the Ethics Commission in person to correct the reports.

Maine ethics lobby reporting is new to me. Honestly, this was a sincere mistake. I make every effort to follow the law when reporting our activities. In that spirit the reports were and are filed on time each month.

For these reasons, please consider a waiver of the penalty for the reporting error. I would be happy to provide answers to any questions you may have.

Thank you for considering my request.

Sincerely,

A handwritten signature in cursive script that reads 'Benjamin Grant'.

Benjamin Grant
Director, Public Affairs
Ben@dirigopartners.net



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

September 16, 2021

Ben Grant
Dirigo Partners
5 Martin Ave.
Waterville, ME 04901

Re: Late Filing of Lobbyist Report

Dear Mr. Grant:

The Commission staff has made a preliminary determination that a penalty of \$2,500 applies for the late filing of six lobbyist disclosure report for your clients, Associated Builders and Contractors of Maine, Pharmaceutical Care Management Association, and the Association of Home Appliance Manufacturers. See, 3 MRSA § 319. The late reports and associated penalties are itemized on the enclosed invoice.

If you disagree with the preliminary penalty, you may request a waiver by submitting a statement, in writing, to the Commission stating the reason the report was filed late and requesting that the preliminary penalty be waived. All requests for waiver will be included on the agenda for the next Commission meeting.

If you do not intend to seek a waiver of the preliminary penalty, please mail a check, payable to "Treasurer, State of Maine," for the above amount to the Ethics Commission at 135 State House Station, Augusta, Maine 04333. You may also pay with a Visa or MasterCard online at www.maine.gov/ethics by selecting the "penalty payment" option.

Please either pay the preliminary penalty or submit a request for waiver within 14 days of the date of this letter. Please call me at (207) 287-4709 or send me an email at michael.dunn@maine.gov if you have questions.

Sincerely,

Michael J. Dunn

Michael J. Dunn, Esq.
Political Committee and Lobbyist Registrar

Enclosure

INVOICE
(Please enclose with payment.)

Mail payment to:

Maine Ethics Commission
135 State House Station
Augusta, ME 04333

Make checks payable to: "Treasurer, State of Maine."

Ben Grant
Dirigo Partners
5 Martin Ave.
Waterville, ME 04901

Account	Report	Description	No. of Months Late	Monthly Penalty	Total
Associated Builders and Contractors of Maine	February	Failed to Disclose \$375 in compensation and lobbying of 2 LA	7	\$100	\$700
Associated Builders and Contractors of Maine	July	Failed to Disclose \$625 in compensation and lobbying of 2 LA	2	\$100	\$200
Association of Home Appliance Manufacturers	May	Failed to Disclose \$625 in compensation and lobbying of 3 LA	4	\$100	\$400
Association of Home Appliance Manufacturers	June	Failed to Disclose \$625 in compensation and lobbying of 3 LA	3	\$100	\$300
Pharmaceutical Care Management Association	April	Failed to Disclose \$500 in compensation and lobbying of 3 LA	5	\$100	\$500
Pharmaceutical Care Management Association	May	Failed to Disclose \$500 in compensation and lobbying of 3 LA	4	\$100	\$400
TOTAL					\$2,500

***LA is "Legislative Actions"**



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

LOBBYIST DISCLOSURE REPORT FOR FEBRUARY 2021

LOBBYIST INFORMATION	
GARRETT MASON Dirigo Partners 312 RIDGE ROAD LISBON FALLS, ME 04252	Telephone: (207) 844-3691 GARRETT@DIRIGOPARTNERS.NET ID: 12100
CLIENT INFORMATION	
ASSOCIATED BUILDERS AND CONTRACTORS OF MAINE Principal Contact: Hope Pollard 728 MAIN STREET, SUITE 4 RICHMOND, ME 04357	Telephone: (207) 841-5217 hope@abcmaine.com
CERTIFICATION	
<p>I, Ben Grant, affirm that, during the month of the report, the lobbyist named above did not lobby on behalf of the named client and did not make any expenditures in support of lobbying or to or on behalf of any covered official or a family member of a covered official; and that the client received no contributions or payments from another during the month of the report for the purposes of lobbying; and that no information is knowingly withheld to the best of my knowledge.</p> <p>Report Filed by: Ben Grant Report Filed on: March 10, 2021</p> <p>If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report</p> <p>Unsworn falsification is a Class D crime (17-A M.R.S.A. § 453).</p>	



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LOBBYIST DISCLOSURE REPORT FOR FEBRUARY 2021

LOBBYIST INFORMATION		
GARRETT MASON Dirigo Partners 312 RIDGE ROAD LISBON FALLS, ME 04252		Telephone: (207) 844-3691 GARRETT@DIRIGOPARTNERS.NET ID: 12100
CLIENT INFORMATION		
ASSOCIATED BUILDERS AND CONTRACTORS OF MAINE Principal Contact: Hope Pollard 728 MAIN STREET, SUITE 4 RICHMOND, ME 04357		Telephone: (207) 841-5217 hope@abcmaine.com
LOBBYIST ASSOCIATES		
BEN GRANT, KEITH HERRICK		
TOTAL COMPENSATION FOR LOBBYING		
\$375.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
TOTAL EXPENDITURES MADE FOR LOBBYING ACTIVITIES		
\$0.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
TOTAL EXPENDITURES MADE TO OR ON BEHALF OF OFFICIALS AND FAMILY MEMBERS		
\$0.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
EXPENDITURES OF \$25 OR MORE FOR OFFICIALS AND FAMILY MEMBERS		
LIST OF EVENTS AND ATTENDEES IF \$250 OR MORE WAS SPENT ON OFFICIALS		
LEGISLATIVE ACTIONS THAT WERE THE SUBJECT OF LOBBYING		
Bills	LD 97, LD 126	
Issues		
LEGISLATIVE ACTIONS FOR WHICH COMPENSATION/EXPENDITURES EXCEEDED \$1,000		
Bills		
Issues		
ORIGINAL SOURCES OF CONTRIBUTIONS/PAYMENTS OF \$1,000 OR MORE TO CLIENT		
LEGISLATIVE ACTIONS THAT WERE THE SUBJECT OF GRASSROOTS LOBBYING (OVER \$2,000)		
CERTIFICATION		

I, Ben Grant, affirm that the information contained in this report is true and complete and that no information is knowingly withheld to the best of my knowledge.

Report Filed by: Ben Grant
Report Filed on: September 13, 2021

If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report

Unsworn falsification is a Class D crime (17-A M.R.S.A. § 453).



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LOBBYIST DISCLOSURE REPORT FOR JULY 2021

LOBBYIST INFORMATION	
GARRETT MASON Dirigo Partners 312 RIDGE ROAD LISBON FALLS, ME 04252	Telephone: (207) 844-3691 GARRETT@DIRIGOPARTNERS.NET ID: 12100
CLIENT INFORMATION	
ASSOCIATED BUILDERS AND CONTRACTORS OF MAINE Principal Contact: Hope Pollard 728 MAIN STREET, SUITE 4 RICHMOND, ME 04357	Telephone: (207) 841-5217 hope@abcmaine.com
CERTIFICATION	
<p>I, Ben Grant, affirm that, during the month of the report, the lobbyist named above did not lobby on behalf of the named client and did not make any expenditures in support of lobbying or to or on behalf of any covered official or a family member of a covered official; and that the client received no contributions or payments from another during the month of the report for the purposes of lobbying; and that no information is knowingly withheld to the best of my knowledge.</p> <p>Report Filed by: Ben Grant Report Filed on: August 03, 2021</p> <p>If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report</p> <p>Unsworn falsification is a Class D crime (17-A M.R.S.A. § 453).</p>	



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LOBBYIST DISCLOSURE REPORT FOR JULY 2021

LOBBYIST INFORMATION		
GARRETT MASON Dirigo Partners 312 RIDGE ROAD LISBON FALLS, ME 04252		Telephone: (207) 844-3691 GARRETT@DIRIGOPARTNERS.NET ID: 12100
CLIENT INFORMATION		
ASSOCIATED BUILDERS AND CONTRACTORS OF MAINE Principal Contact: Hope Pollard 728 MAIN STREET, SUITE 4 RICHMOND, ME 04357		Telephone: (207) 841-5217 hope@abcmaine.com
LOBBYIST ASSOCIATES		
BEN GRANT, KEITH HERRICK		
TOTAL COMPENSATION FOR LOBBYING		
\$625.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
TOTAL EXPENDITURES MADE FOR LOBBYING ACTIVITIES		
\$0.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
TOTAL EXPENDITURES MADE TO OR ON BEHALF OF OFFICIALS AND FAMILY MEMBERS		
\$0.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
EXPENDITURES OF \$25 OR MORE FOR OFFICIALS AND FAMILY MEMBERS		
LIST OF EVENTS AND ATTENDEES IF \$250 OR MORE WAS SPENT ON OFFICIALS		
LEGISLATIVE ACTIONS THAT WERE THE SUBJECT OF LOBBYING		
Bills	LD 1231, LD 1411	
Issues		
LEGISLATIVE ACTIONS FOR WHICH COMPENSATION/EXPENDITURES EXCEEDED \$1,000		
Bills		
Issues		
ORIGINAL SOURCES OF CONTRIBUTIONS/PAYMENTS OF \$1,000 OR MORE TO CLIENT		
LEGISLATIVE ACTIONS THAT WERE THE SUBJECT OF GRASSROOTS LOBBYING (OVER \$2,000)		
CERTIFICATION		

I, Ben Grant, affirm that the information contained in this report is true and complete and that no information is knowingly withheld to the best of my knowledge.

Report Filed by: Ben Grant
Report Filed on: September 13, 2021

If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report

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LOBBYIST DISCLOSURE REPORT FOR MAY 2021

LOBBYIST INFORMATION	
GARRETT MASON Dirigo Partners 312 RIDGE ROAD LISBON FALLS, ME 04252	Telephone: (207) 844-3691 GARRETT@DIRIGOPARTNERS.NET ID: 12099
CLIENT INFORMATION	
Association of Home Appliance Manufacturers Principal Contact: Kevin Messner 1111 19th St NW Suite 402 Washington, DC 20036	Telephone: (202) 872-5955 kmessner@aham.org
CERTIFICATION	
<p>I, Ben Grant, affirm that, during the month of the report, the lobbyist named above did not lobby on behalf of the named client and did not make any expenditures in support of lobbying or to or on behalf of any covered official or a family member of a covered official; and that the client received no contributions or payments from another during the month of the report for the purposes of lobbying; and that no information is knowingly withheld to the best of my knowledge.</p> <p>Report Filed by: Ben Grant Report Filed on: June 14, 2021</p> <p>If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report</p> <p>Unsworn falsification is a Class D crime (17-A M.R.S.A. § 453).</p>	



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LOBBYIST DISCLOSURE REPORT FOR MAY 2021

LOBBYIST INFORMATION		
GARRETT MASON Dirigo Partners 312 RIDGE ROAD LISBON FALLS, ME 04252		Telephone: (207) 844-3691 GARRETT@DIRIGOPARTNERS.NET ID: 12099
CLIENT INFORMATION		
Association of Home Appliance Manufacturers Principal Contact: Kevin Messner 1111 19th St NW Suite 402 Washington, DC 20036		Telephone: (202) 872-5955 kmessner@aham.org
LOBBYIST ASSOCIATES		
BEN GRANT, KEITH HERRICK		
TOTAL COMPENSATION FOR LOBBYING		
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EXPENDITURES OF \$25 OR MORE FOR OFFICIALS AND FAMILY MEMBERS		
LIST OF EVENTS AND ATTENDEES IF \$250 OR MORE WAS SPENT ON OFFICIALS		
LEGISLATIVE ACTIONS THAT WERE THE SUBJECT OF LOBBYING		
Bills	LD 1471, LD 1503, LD 1541	
Issues		
LEGISLATIVE ACTIONS FOR WHICH COMPENSATION/EXPENDITURES EXCEEDED \$1,000		
Bills		
Issues		
ORIGINAL SOURCES OF CONTRIBUTIONS/PAYMENTS OF \$1,000 OR MORE TO CLIENT		
LEGISLATIVE ACTIONS THAT WERE THE SUBJECT OF GRASSROOTS LOBBYING (OVER \$2,000)		
CERTIFICATION		

I, Ben Grant, affirm that the information contained in this report is true and complete and that no information is knowingly withheld to the best of my knowledge.

Report Filed by: Ben Grant
Report Filed on: September 13, 2021

If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report

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LOBBYIST DISCLOSURE REPORT FOR JUNE 2021

LOBBYIST INFORMATION	
GARRETT MASON Dirigo Partners 312 RIDGE ROAD LISBON FALLS, ME 04252	Telephone: (207) 844-3691 GARRETT@DIRIGOPARTNERS.NET ID: 12099
CLIENT INFORMATION	
Association of Home Appliance Manufacturers Principal Contact: Kevin Messner 1111 19th St NW Suite 402 Washington, DC 20036	Telephone: (202) 872-5955 kmessner@aham.org
CERTIFICATION	
<p>I, Ben Grant, affirm that, during the month of the report, the lobbyist named above did not lobby on behalf of the named client and did not make any expenditures in support of lobbying or to or on behalf of any covered official or a family member of a covered official; and that the client received no contributions or payments from another during the month of the report for the purposes of lobbying; and that no information is knowingly withheld to the best of my knowledge.</p> <p>Report Filed by: Ben Grant Report Filed on: July 13, 2021</p> <p>If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report</p> <p>Unsworn falsification is a Class D crime (17-A M.R.S.A. § 453).</p>	



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LOBBYIST DISCLOSURE REPORT FOR JUNE 2021

LOBBYIST INFORMATION		
GARRETT MASON Dirigo Partners 312 RIDGE ROAD LISBON FALLS, ME 04252		Telephone: (207) 844-3691 GARRETT@DIRIGOPARTNERS.NET ID: 12099
CLIENT INFORMATION		
Association of Home Appliance Manufacturers Principal Contact: Kevin Messner 1111 19th St NW Suite 402 Washington, DC 20036		Telephone: (202) 872-5955 kmessner@aham.org
LOBBYIST ASSOCIATES		
BEN GRANT, KEITH HERRICK		
TOTAL COMPENSATION FOR LOBBYING		
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TOTAL EXPENDITURES MADE FOR LOBBYING ACTIVITIES		
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LEGISLATIVE ACTIONS THAT WERE THE SUBJECT OF GRASSROOTS LOBBYING (OVER \$2,000)		
CERTIFICATION		

I, Ben Grant, affirm that the information contained in this report is true and complete and that no information is knowingly withheld to the best of my knowledge.

Report Filed by: Ben Grant
Report Filed on: September 13, 2021

If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report

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LOBBYIST DISCLOSURE REPORT FOR APRIL 2021

LOBBYIST INFORMATION	
Keith Herrick Dirigo Partners 71 Seths Way West Gardiner, ME 04345	Telephone: (207) 807-5698 keith@dirigopartners.net ID: 12102
CLIENT INFORMATION	
Pharmaceutical Care Management Association Principal Contact: Heather Cascone 325 7th Street Washington, DC 20004	Telephone: (207) 844-3691 hcascone@pcmanet.org
CERTIFICATION	
<p>I, Ben Grant, affirm that, during the month of the report, the lobbyist named above did not lobby on behalf of the named client and did not make any expenditures in support of lobbying or to or on behalf of any covered official or a family member of a covered official; and that the client received no contributions or payments from another during the month of the report for the purposes of lobbying; and that no information is knowingly withheld to the best of my knowledge.</p> <p>Report Filed by: Ben Grant Report Filed on: May 16, 2021</p> <p>If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report</p> <p>Unsworn falsification is a Class D crime (17-A M.R.S.A. § 453).</p>	



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LOBBYIST DISCLOSURE REPORT FOR APRIL 2021

LOBBYIST INFORMATION		
Keith Herrick Dirigo Partners 71 Seths Way West Gardiner, ME 04345	Telephone: (207) 807-5698 keith@dirigopartners.net	ID: 12102
CLIENT INFORMATION		
Pharmaceutical Care Management Association Principal Contact: Heather Cascone 325 7th Street Washington, DC 20004	Telephone: (207) 844-3691 hcascone@pcmanet.org	
LOBBYIST ASSOCIATES		
GARRETT MASON, BEN GRANT		
TOTAL COMPENSATION FOR LOBBYING		
\$500.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
TOTAL EXPENDITURES MADE FOR LOBBYING ACTIVITIES		
\$0.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
TOTAL EXPENDITURES MADE TO OR ON BEHALF OF OFFICIALS AND FAMILY MEMBERS		
\$0.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
EXPENDITURES OF \$25 OR MORE FOR OFFICIALS AND FAMILY MEMBERS		
LIST OF EVENTS AND ATTENDEES IF \$250 OR MORE WAS SPENT ON OFFICIALS		
LEGISLATIVE ACTIONS THAT WERE THE SUBJECT OF LOBBYING		
Bills	LD 1115, LD 1268, LD 1450	
Issues		
LEGISLATIVE ACTIONS FOR WHICH COMPENSATION/EXPENDITURES EXCEEDED \$1,000		
Bills		
Issues		
ORIGINAL SOURCES OF CONTRIBUTIONS/PAYMENTS OF \$1,000 OR MORE TO CLIENT		
LEGISLATIVE ACTIONS THAT WERE THE SUBJECT OF GRASSROOTS LOBBYING (OVER \$2,000)		
CERTIFICATION		

I, Ben Grant, affirm that the information contained in this report is true and complete and that no information is knowingly withheld to the best of my knowledge.

Report Filed by: Ben Grant
Report Filed on: September 13, 2021

If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report

Unsworn falsification is a Class D crime (17-A M.R.S.A. § 453).



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

LOBBYIST DISCLOSURE REPORT FOR MAY 2021

LOBBYIST INFORMATION	
Keith Herrick Dirigo Partners 71 Seths Way West Gardiner, ME 04345	Telephone: (207) 807-5698 keith@dirigopartners.net ID: 12102
CLIENT INFORMATION	
Pharmaceutical Care Management Association Principal Contact: Heather Cascone 325 7th Street Washington, DC 20004	Telephone: (207) 844-3691 hcascone@pcmanet.org
CERTIFICATION	
<p>I, Ben Grant, affirm that, during the month of the report, the lobbyist named above did not lobby on behalf of the named client and did not make any expenditures in support of lobbying or to or on behalf of any covered official or a family member of a covered official; and that the client received no contributions or payments from another during the month of the report for the purposes of lobbying; and that no information is knowingly withheld to the best of my knowledge.</p> <p>Report Filed by: Ben Grant Report Filed on: June 14, 2021</p> <p>If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report</p> <p>Unsworn falsification is a Class D crime (17-A M.R.S.A. § 453).</p>	



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LOBBYIST INFORMATION		
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CLIENT INFORMATION		
Pharmaceutical Care Management Association Principal Contact: Heather Cascone 325 7th Street Washington, DC 20004	Telephone: (207) 844-3691 hcascone@pcmanet.org	
LOBBYIST ASSOCIATES		
GARRETT MASON, BEN GRANT		
TOTAL COMPENSATION FOR LOBBYING		
\$500.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
TOTAL EXPENDITURES MADE FOR LOBBYING ACTIVITIES		
\$0.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
TOTAL EXPENDITURES MADE TO OR ON BEHALF OF OFFICIALS AND FAMILY MEMBERS		
\$0.00 Legislative Branch Officials	\$0.00 Executive Branch Officials	\$0.00 Constitutional Officials
EXPENDITURES OF \$25 OR MORE FOR OFFICIALS AND FAMILY MEMBERS		
LIST OF EVENTS AND ATTENDEES IF \$250 OR MORE WAS SPENT ON OFFICIALS		
LEGISLATIVE ACTIONS THAT WERE THE SUBJECT OF LOBBYING		
Bills	LD 1115, LD 1268, LD 1450	
Issues		
LEGISLATIVE ACTIONS FOR WHICH COMPENSATION/EXPENDITURES EXCEEDED \$1,000		
Bills		
Issues		
ORIGINAL SOURCES OF CONTRIBUTIONS/PAYMENTS OF \$1,000 OR MORE TO CLIENT		
LEGISLATIVE ACTIONS THAT WERE THE SUBJECT OF GRASSROOTS LOBBYING (OVER \$2,000)		
CERTIFICATION		

I, Ben Grant, affirm that the information contained in this report is true and complete and that no information is knowingly withheld to the best of my knowledge.

Report Filed by: Ben Grant
Report Filed on: September 13, 2021

If this report is filed by an authorized agent of the Principal Lobbyist, the Principal Lobbyist and the agent are liable for any violations of the Lobbyist Disclosure Law (3 M.R.S.A Chapter 15) that may result from the filing of a false or inaccurate report

Unsworn falsification is a Class D crime (17-A M.R.S.A. § 453).

Title 3 Maine Revised Statutes

§ 313. Registration of lobbyists, lobbyist associates and employers

A lobbyist shall submit a joint registration for the lobbyist and any lobbyist associates and the employer of that lobbyist with the commission no later than 15 business days after lobbying more than 8 hours in a calendar month and pay a registration fee of \$200. For each lobbyist associate included in the registration, the lobbyist shall pay an additional \$100 fee.

§ 317. Reports

A registered lobbyist shall file a report for each month that the Legislature is in session on forms prescribed or approved by the commission, even if no lobbying has been performed or compensation or reimbursement for expenses received for the month.

1. Monthly session reports. During the period in which the Legislature is in session, a registered lobbyist shall file with the commission, no later than 11:59 p.m. on the 15th calendar day of each month, a report concerning the lobbyist's activities for the previous month regarding each employer.

The monthly report must contain the following information:

- A.** The month to which the report pertains;
- B.** The name and address of the lobbyist and employer;
- C.** The names of the individuals who lobbied during the month;
- D.** The total amount of compensation the lobbyist and lobbyist associates received or expect to receive for lobbying during the month. The amount of compensation for lobbying officials in the legislative branch, officials in the executive branch and constitutional officers must be reported separately.

In the case of a lobbyist or lobbyist associate who is a regular employee of the employer, the amount of compensation must be computed by multiplying the number of hours devoted to the preparation of documents and research for the primary purpose of influencing legislative action and to lobbying by the employee's regular rate of pay based on a 40-hour week;

E. The total amount of expenditures made or incurred by the lobbyist and lobbyist associates during the month for purposes of lobbying for which they have been or expect to be reimbursed. The amount of expenditures for lobbying officials in the legislative branch, officials in the executive branch and constitutional officers must be reported separately;

E-1. When expenditures made or incurred for the purposes of grassroots lobbying exceed \$2,000 during the month that is the subject of the report, the specific dollar amount of expenditures for grassroots lobbying made or incurred during the month

by a lobbyist, lobbyist associate or employer, with separate totals for expenditure categories as determined by the commission, and the legislative actions that are the subject of the grassroots lobbying. Salaries paid to the employer's regular employees are not expenditures for the purposes of this paragraph and are exempt from disclosure under this paragraph;

F. The total amount of expenditures by the lobbyist and lobbyist associates on behalf of the employer for which they have been or expect to be reimbursed and by the employer directly to or on behalf of one or more covered officials, including members of the official's immediate family;

G. For each expenditure of \$25 or more reported under paragraph F, the person making the expenditure and the date, amount and purpose of the expenditure and the name of the covered official or official's immediate family member on whose behalf the expenditure was made;

G-1. If the total cost for covered officials and the officials' immediate family members to attend an event paid for by the employer or by the lobbyist, lobbyist associate or lobbying firm on the employer's behalf is \$250 or more, the date and a description of the event, a list of the names of covered officials and the officials' immediate family members in attendance and the total cost for the covered officials and the officials' immediate family members to attend the event;

H. A list of each legislative action by Legislative Document number, specific issue, nomination or other matter in connection with which the lobbyist is engaged in lobbying;

I. A list specifically identifying each legislative action for which the lobbyist and lobbyist associates were compensated or expect to be compensated, or expended in excess of \$1,000 for lobbying related to those actions and a statement of the amounts compensated or expended for each; and

J. A list of all of the employer's original sources and a statement of the dollar amounts contributed or paid by the original sources to the employer. If the original source is a corporation formed under Title 13 or 13-C or former Title 13-A, nonprofit corporation formed under Title 13-B or limited partnership under Title 31, the corporation, nonprofit organization or limited partnership, not the individual members or contributors, must be listed as the original source.

...

§ 319. Penalty

1. Failure to file registration or report. Any person who fails to file a registration or report as required by this chapter may be assessed a fine of \$ 100 for every month the person fails to register or is delinquent in filing a report pursuant to section 317. If a registration or report is filed late, the commission shall send a notice of the finding of violation and preliminary penalty. The notice must provide the lobbyist with an opportunity to request a waiver of the preliminary penalty. If a lobbyist files a report required pursuant

to section 317 within 24 hours after the deadline, the amount of the preliminary penalty is \$ 50. The commission may waive the fine or penalty in whole or in part if the commission determines the failure to register or report was due to mitigating circumstances or the fine or penalty is disproportionate to the level of experience of the lobbyist or the harm suffered by the public from the late registration or report. For purposes of this subsection, “mitigating circumstances” means:

- A.** A valid emergency determined by the commission, in the interest of the sound administration of justice, to warrant the waiver of the fine or penalty in whole or in part;
- B.** An error by the commission; or
- C.** Circumstances determined by the commission to warrant the waiver of the fine or penalty in whole or in part, based upon relevant evidence presented that a bona fide effort was made to file the report in accordance with this chapter, including, but not limited to, unexplained delays in Internet service.

...

Lobbyist Guidebook

All registrations must first be approved by Commission staff before taking effect. Registrations will not be approved until payment is received.

Content of the registration

Joint registration forms must include the following information:

- Name of the lobbyist and any associates;
- The client on whose behalf the lobbyist and associates will lobby;
- Business address and contact information for the lobbyist, any associates, and the client;
- The date upon which lobbying commenced and the date on which the 8-hour threshold was exceeded;
- A description of the client's business or mission and its legislative interests;
- The legislative committees the lobbyist will lobby during the year;
- The amount of compensation the lobbyist will receive, or the basis by which compensation will be determined; and
- The names of any person authorized to file reports on behalf of the lobbyist.
- A certification that the lobbyist and any associates have completed the annual harassment training.

Important Information About Monthly Reporting

Once a lobbyist and client are registered, the lobbyist is required to file monthly reports with the Commission. A separate monthly report must be filed for each client and the reports must include the activity of the lobbyist and any lobbyist associates.

There are two types of monthly reports, long-form reports, and short-form reports. (see "How to File Monthly Reports" for more information). If no lobbying was done and no expenditures incurred or made in a month, a short-form report may be filed. Long form reports are required to be filed if:

- any lobbying occurred during the calendar month, even if less than 8 hours;
- the lobbyist incurred or was reimbursed for any expenditures associated with lobbying activities, such as travel and lodging, outside research or consulting services, printing, etc.;
- the lobbyist or the client had any expenditures related to covered officials, including expenditures related to informational events; or