



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

To: Commission
From: Jonathan Wayne, Executive Director
Date: May 18, 2025
Re: Review of 2022 and 2024 Campaign Finance Reporting by Rep. Dick Campbell

Candidates for the Maine Legislature are required to file campaign finance reports with the Commission disclosing the contributions they have received and the expenditures they have made. Before filing each report, the candidate must certify that the report is complete and accurate. A report is considered timely filed if it is submitted before the deadline and substantially conforms to the disclosure requirements. The Commission is directed to determine whether each report satisfies the requirements for timely filing.

This memo seeks authorization to obtain bank records of State Representative Richard Campbell's 2022 and 2024 campaign finance activity to verify that his financial reporting to the Commission was complete and accurate. To facilitate this, the Commission staff would be happy to prepare a letter for the candidate to sign authorizing his bank to release the records to us. This would require minimal effort by the candidate.

We believe this limited review or investigation is warranted under the circumstances discussed below and would be consistent with the Commission's program of activities that underscore complete and accurate reporting is important.

If we discover there are minor errors in the candidate's 2022 and 2024 reporting, the Commission staff will provide the candidate with a list of those errors so he can voluntarily amend those reports. If we find that any filed 2022 or 2024 report was not substantially correct, the Commission would have the option of considering the report late.

Relevant Law (ETH 17-27)

Candidates' financial reporting responsibilities. Candidates for the Maine Legislature are required to file at least six campaign finance reports during an election year. 21-A M.R.S. § 1017(3-A)(B), (D) & (D-1). The reports must include all contributions received and expenditures made during the period of time covered by the report. § 1017(5). The person filing the report must certify the completeness and accuracy of reported contributions and expenditures. § 1016 (second sentence).

For each campaign finance report filed with the Commission, our eFiling system calculates a beginning and ending cash balance for the report period. These amounts are shown in a financial summary section that is available to the public. Ideally, if a candidate has disclosed

all their contributions and expenditures correctly, the ending cash balance will match the *actual* balance of funds in the filer's campaign bank account.

Carrying forward post-election surplus to next election. If a candidate has surplus funds of more than \$100 after an election, they are required to file campaign finance reports every six months on each July 15th and January 15th until they dispose of the surplus.

If a candidate with a post-election surplus registers for the following election, they have the option of carrying forward the surplus to the next election. 21-A M.R.S. § 1017(9). In their first campaign finance report for the next election, they report the amount they are carrying forward.

Segregation of campaign funds. All campaign funds of a candidate must be segregated from, and may not be commingled with, any personal funds of the candidate, treasurer or other officers. 21-A M.R.S. § 1016(1). Typically, this means a candidate opens a separate bank account for their campaign funds.

Commission's review of campaign finance reports. A report is considered timely filed if it was submitted before the deadline and substantially conforms to the disclosure requirements. 21-A M.R.S. § 1020-A(2). The Commission is directed to determine whether each report satisfies the requirements for timely filing. *Id.*

The Commission's rules require its staff to review all campaign finance reports filed by candidates to verify compliance with financial disclosure and documentation requirements. 94-270 C.M.R. ch. 1, § 4(2)(A). Pursuant to this direction, the staff's two Candidate Registrars look at every report and follow up with candidates if they suspect that disclosures by a candidate are incomplete.

April-May 2026 Communications with State Representative Dick Campbell

State Representative Dick Campbell is serving his tenth term as a member of the Maine Legislature. Most recently, he ran for election in 2022 and 2024. At the end of his 2024 campaign, the contributions he reported indicated he had an ending cash balance of \$7,232.71. ETH-1. (In his 2024 campaign, Rep. Campbell reported receiving \$3,275 in contributions and making no expenditures. ETH-1. He had no opponent in the election.) Because he reported that he had surplus 2024 funds greater than \$100, he filed post-election campaign finance reports every six months through January 15, 2026. Those reports showed no transactions since the 2024 general election. ETH-2.

Rep. Campbell registered as a candidate for re-election in the 2026 elections. His first 2026 campaign finance report was due April 28, 2026. In a telephone call on or before the deadline, Candidate Registrar Erin Gordon advised Rep. Campbell how to file his April 28th report. She asked him to find out the actual amount of his surplus 2024 campaign funds from his bank and to enter that amount in the Commission's eFiling system as a transfer of funds to his 2026 campaign.

In his April 28, 2026 report, Rep. Campbell entered that he was transferring \$2,689.00 in surplus 2024 campaign funds to his 2026 campaign. ETH-7. This caused concern within the Commission staff, because there was a significant \$4,543 discrepancy between: (1) the calculated ending cash balance of \$7,232.71 shown in his last 2024 report, and (2) the amount of \$2,689.00 in surplus 2024 funds he certified he was bringing forward to 2026.

On May 4, 2026, Candidate Registrar Erin Gordon sent a letter to Rep. Campbell by email and regular mail requesting that he provide bank statements for his campaign account from January 1, 2024 to April 2026 so that the Commission staff could determine if he had under-reported his 2024 expenditures or made other reporting errors. ETH 10-11. We made this request as an informal staff compliance review that would save Rep. Campbell the embarrassment of having a requested “investigation” on a public meeting agenda of the Commission.

After a week with no response, on May 11, 2026, I sent a letter to Rep. Campbell by email and regular mail notifying him that the Commission staff intended to put a request for investigation for the agenda of the Commission’s May 27, 2026 meeting. ETH-12. On May 12, 2026, Rep. Campbell called Ms. Gordon to say that the Commission staff “were right” about his surplus funds balance and the balance was supposed to be the roughly \$7,200 amount reported by his 2024 campaign. Rep. Campbell named a specific amount on the call. He explained that he has many accounts at his bank and they gave him information for the wrong account. ETH-13.

Ms. Gordon consulted with both Commission managers, who responded that Rep. Campbell should provide his most recent bank statement that would document that his actual surplus cash funds from 2024 was \$7,232.71, the amount shown in our eFiling system. Again, Rep. Campbell reported no financial activity from his 2024 general election through March 2026, so his March or April 2026 bank statements should show the same balance Rep. Campbell had at the end of his 2024 campaign.

Accordingly, on May 12, 2026, Ms. Gordon requested that Rep. Campbell submit his March and April 2026 bank account statements that would document the balance in his campaign bank account. ETH-14. After not receiving any acknowledgment or response within three days, on May 15, 2026, I sent Rep. Campbell a follow-up email reaffirming that we would accept a March or April bank statement as a means of resolving the situation without a public investigation. ETH 15-16. We have not received any response in past three days since my May 15, 2026 email.

Proposed Investigation

The Commission staff believes the best course of action to take in this situation is “trust, but verify.” At the very least, the Commission should insist on a bank statement for March or April 2026 that supports the ending 2024 cash balance of \$7,232.71. If Rep. Campbell does not produce such a bank statement by the Commission’s May 27, 2026 meeting, it would be entirely appropriate for the following reasons to obtain the bank statements for Rep. Campbell’s

campaign account in 2022 and 2024 to verify that his campaign finance reporting was complete and accurate in those two election years:

- Rep. Campbell declined to provide any bank statement in response to three requests this month.
- It is not hard to obtain a bank statement from online banking or a local branch of a bank. There is a branch of Rep. Campbell's bank 5.6 miles from his home.
- Also, to reduce any burden on Rep. Campbell, Commission staff offered to prepare a bank authorization letter for the State Representative to sign.
- Rep. Campbell has a leadership PAC, Building the Maine House. In July 2024, the Commission considered possible penalties against the PAC because it had filed nine late campaign finance reports in the previous five years. For procedural reasons, no penalty was assessed. Through an attorney, Rep. Campbell acknowledged that he needed to do better with his PAC reporting and promised to find a treasurer for his PAC.
- Upon information and belief, Rep. Campbell handles the campaign finance reporting for his re-election campaigns by himself, without the accountability and assistance that results from having a separate treasurer.
- In his 2024 campaign, Rep. Campbell reported making no expenditures. He had no opponent in the election. While it is possible that he spent no money for his 2024 re-election, he did go the trouble of collecting \$3,275 in contributions. As a comparison, Rep. Campbell was also unopposed in 2022 but he spent \$3,138.53 in campaign funds anyway.

Staff Recommendation

If Rep. Campbell does not produce a bank statement from March or April 2026 showing a cash balance near \$7,232.71 prior to the May 27, 2026 meeting, the Commission staff recommend authorizing an investigation of Rep. Campbell's 2022 and 2024 campaign finance reporting by obtaining bank records for his campaign bank account for that period.



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

2024 CAMPAIGN FINANCE REPORT

FOR PRIVATELY FINANCED CANDIDATES

COMMITTEE		TREASURER	
Hon. Richard H Campbell 321 River Road Orrington, ME 04474 PHONE:(207) 745-7748 EMAIL: dickcampbellllc@gmail.com		Hon. Richard H Campbell 321 River Road Orrington, ME 04474 PHONE:(207) 745-7748 EMAIL: dickcampbellllc@gmail.com	
REPORT	DUE DATE	REPORTING PERIOD	
42-Day Post-General Report	12/17/2024	10/23/2024 - 12/10/2024	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR THIS PERIOD	TOTAL FOR CAMPAIGN
1. CASH CONTRIBUTIONS FOR THE PRIMARY ELECTION (SCHEDULE A)	\$0.00	\$4,432.71
1A. CASH CONTRIBUTIONS FOR THE GENERAL ELECTION(SCHEDULE A) <i>For party candidates, general election contributions will only appear on this line after the primary.</i>	\$0.00	\$2,800.00
1B. CASH CONTRIBUTIONS FOR THE GENERAL ELECTION RAISED PRIOR TO PRIMARY (Not shown on Schedule A of this report)		\$0.00
2. OTHER CASH RECEIPTS (INTEREST, ETC)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS	\$0.00	\$7,232.71
EXPENDITURES		
5. EXPENDITURES (SCHEDULE B)	\$0.00	\$0.00
6. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
7. TOTAL PAYMENTS	\$0.00	\$0.00
CASH SUMMARY		
8. CASH BALANCE AT BEGINNING OF PERIOD	\$7,232.71	
9. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$0.00	
10. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 7)	\$0.00	
11. CASH BALANCE AT END OF PERIOD	\$7,232.71	
OTHER ACTIVITY		
12. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
13. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
14. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	
FOR PARTY CANDIDATES ONLY: CASH CONTRIBUTIONS FOR THE GENERAL ELECTION RAISED PRIOR TO PRIMARY ELECTION (INCLUDED IN LINE 1A AFTER PRIMARY ELECTION)		

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

REPORT FILED BY: Richard H. Campbell
 REPORT FILED ON: 12/15/2024 8:23:20 PM
 LAST MODIFIED:
 COMMITTEE ID: 490964



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

2026 CAMPAIGN FINANCE REPORT

FOR PRIVATELY FINANCED CANDIDATES

COMMITTEE		TREASURER	
Hon. Richard H Campbell 321 River Road Orrington, ME 04474 PHONE:(207) 745-7748 EMAIL: dickcampbellllc@gmail.com		Hon. Richard H Campbell 321 River Road Orrington, ME 04474 PHONE:(207) 745-7748 EMAIL: dickcampbellllc@gmail.com	
REPORT	DUE DATE	REPORTING PERIOD	
2026 January Semiannual Report	01/15/2026	07/01/2025 - 12/31/2025	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR THIS PERIOD	TOTAL FOR CAMPAIGN
1. CASH CONTRIBUTIONS FOR THE PRIMARY ELECTION (SCHEDULE A)	\$0.00	\$4,432.71
1A. CASH CONTRIBUTIONS FOR THE GENERAL ELECTION(SCHEDULE A) <i>For party candidates, general election contributions will only appear on this line after the primary.</i>	\$0.00	\$2,800.00
1B. CASH CONTRIBUTIONS FOR THE GENERAL ELECTION RAISED PRIOR TO PRIMARY (Not shown on Schedule A of this report)		\$0.00
2. OTHER CASH RECEIPTS (INTEREST, ETC)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS	\$0.00	\$7,232.71
EXPENDITURES		
5. EXPENDITURES (SCHEDULE B)	\$0.00	\$0.00
6. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
7. TOTAL PAYMENTS	\$0.00	\$0.00
CASH SUMMARY		
8. CASH BALANCE AT BEGINNING OF PERIOD	\$7,232.71	
9. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$0.00	
10. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 7)	\$0.00	
11. CASH BALANCE AT END OF PERIOD	\$7,232.71	
OTHER ACTIVITY		
12. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
13. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
14. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	
FOR PARTY CANDIDATES ONLY: CASH CONTRIBUTIONS FOR THE GENERAL ELECTION RAISED PRIOR TO PRIMARY ELECTION (INCLUDED IN LINE 1A AFTER PRIMARY ELECTION)		

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

REPORT FILED BY: ERIN GORDON on behalf of Richard H. Campbell
 REPORT FILED ON: 1/15/2026 4:47:42 PM
 LAST MODIFIED:
 COMMITTEE ID: 490964

**SCHEDULE B
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
12/10/2025	Richard Campbell 321 River Road Orrington, ME, 04474	Rollover of surplus	CON	\$7,232.74
TOTAL EXPENDITURES FOR CANDIDATE:				\$0.00

FilingDetails

[Go to Filer Profile](#)[Close](#)

View filing information and itemized transactions

ID	d_01kqdcyfe2ee68hx4aa587jqvs
Report Type	Campaign Finance
Report Status	Filed
Version	0
Created At	April 29, 2026 15:55
Submitted By	RICHARD CAMPBELL
Date Submitted	April 29, 2026 16:46

FilingInformation

Report Name	42 Day Pre Primary Report
Reporting Period	Unbounded - April 21, 2026
Report Due Date	April 28, 2026 23:59
Filer	Richard H. Campbell
Version of Report	Original

FilerInformation

Name	Richard H. Campbell
Email	dickcampbellllc@gmail.com

Phone Number (207) 745-7748

Treasure Information

Name Richard Campbell

Email dickcampbellllc@gmail.com

Filing Summary

Balance at the Beginning of the Period \$0.00

Total Contributions \$2,689.00

Total Monetary Contributions \$2,689.00

Total In-Kind Contributions \$0.00

Unitemized Total - Contributions of \$50 or Less \$0.00

Total Transfers from Previous Campaign \$2,689.00

Total Bank Interest \$0.00

Total Expenditures \$0.00

Total Loans Received \$0.00

Total Debts Owed \$0.00

Balance at the End of the Period \$2,689.00

Debt Balance \$0.00

Loan Balance \$0.00

Itemized Monetary Contributions

No itemized monetary contribution reported

Returned Monetary Contributions

No returned monetary contribution reported

Itemized n-Kind Contributions

No itemized n-kind contribution reported

Returned n-Kind Contributions

No returned n-kind contribution reported

Bank Interest

No bank interest reported

Returned Bank Interest

No returned bank interest reported

Previous Campaign Transfers

Transaction Type	Date	Amount
Previous Campaign Transfer	April 01, 2026	\$2,689.00

Contributor Type	Name	Address
Candidate Committee	House 19 committee	321-1 River Rd Orrington ME 04474-3050

Occupation	Employer
—	—

Returned Previous Campaign Transfers

No returned previous campaign transfers reported

Expenditures

No expenditure reported

Returned Expenditures

No returned expenditure reported

Debts

No debts reported

Debt Payments

No debt payments reported

Loans

No loans reported

Loan Forgivenesses

No loan forgivenesses reported

Loan Payments

Noloanpaymentreported

OpenDebts

Nodebtsreported

OpenLoans

Noloansreported

Certification

Certification Acknowledged Yes

Certification Statement I, RICHARD CAMPBELL, certify that the information contained in this report is true, accurate, and complete to the best of my knowledge.

Certified By RICHARD CAMPBELL

Certified By Email dickcampbellllc@gmail.com

Certification Date April 29, 2026 16:46

From: [Gordon, Erin](#)
To: [Dick Campbell](#)
Cc: [Wayne, Jonathan](#)
Subject: Attention Required: Campaign Records Request
Date: Monday, May 4, 2026 2:22:52 PM
Attachments: [Campbell, Richard - records request.pdf](#)

Good afternoon, Rep. Campbell:

Attached you will find a letter detailing a request for campaign records. We have also sent this request to you by mail. Please note that we are asking for your response no later than May 15.

Thank you,

Erin Gordon

Candidate Registrar

Maine Ethics Commission

(207) 287-3651 | www.maine.gov/ethics

135 State House Station, Augusta, ME 04333-0135

45 Memorial Circle, Augusta, ME



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

May 4, 2026

Representative Richard Campbell
321-1 River Road
Orrington, Maine 04474

Dear Rep. Campbell:

On April 29, 2026, you filed the 42-Day Pre-Primary Report for your 2026 campaign, which showed a "Transfer from Previous Campaign" of \$2,689.00. This type of contribution represents a rollover of the surplus funds from your 2024 campaign.

Your 2024 reporting, however, indicates a surplus balance of \$7,232.71. Due to this substantial discrepancy between the two campaigns, Commission staff believe we must conduct an informal review of your campaign records. Please provide us with bank statements from your campaign bank account dated January 2024 through April 2026. We can also accept printouts of activity for that period from your online banking.

Alternately, we can provide a letter for you to sign authorizing the bank to release those records directly to us. If that is your preference, we will need the name of your bank and your account number.

We will review your bank records and identify any discrepancies in reporting from 2024 to present; we will list those for you if any amendments are needed for your 2024 reports.

Submit either the bank records we have requested or a signed letter to your bank authorizing our access no later than May 15, 2026. If you do not, Commission staff will place the matter on the agenda for the Commission's May 27 meeting and ask their authorization to investigate.

Sincerely,

A handwritten signature in black ink, appearing to be 'ERIN GORDON'.

Erin Gordon,
Candidate Registrar



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

May 11, 2026

By Email and Regular Mail

Hon. Richard H. Campbell, Esq.
321 River Road
Orrington, ME 04474

Notice of Proposed Investigation

Dear Rep. Campbell,

This letter is to notify you that at the May 27, 2026 meeting of the Ethics Commission, agency staff intend to ask for authorization to investigate your 2022-2024 campaign finance reporting. This letter explains the rationale and your opportunity to respond at the meeting.

The Commission's electronic filing system calculates the cash balance of each candidate's campaign, based on the contributions and expenditures they have entered. Ideally, if a candidate has accurately entered their financial activity, the calculated cash balance in the eFiling system will match what is actually in the candidate's campaign bank account.

Roughly three weeks ago, Candidate Registrar Erin Gordon was advising you how to file your first campaign finance report for this year. She asked you to find out from your bank the actual amount of surplus funds from your 2024 election campaign and to enter that as a transfer of funds from your 2024 campaign to your current campaign.

You entered that you were transferring \$2,689.00 in surplus funds from your 2024 campaign to this year's campaign. The problem is that the calculated cash balance from your 2024 campaign in our eFiling system is \$7,232.71, which is \$4,543.71 higher than your actual cash balance. The Commission staff believe it needs to investigate whether you under-reported your spending during 2022-2024 or made other errors in your financial reporting.

If you would like to respond to the proposed investigation, you are welcome to participate in the Commission's May 27, 2026 meeting in person or by Zoom. The meeting will be held in the Commission's office at 45 Memorial Circle in Augusta beginning at 9:00 a.m. You are also welcome to submit written comments in advance of the meeting. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Jonathan Wayne'.

Jonathan Wayne
Executive Director

From: [Gordon, Erin](#)
To: [Wayne, Jonathan](#)
Cc: [Currier, Martha](#)
Subject: RE: Phone Call with Rep. Dick Campbell
Date: Tuesday, May 12, 2026 3:56:27 PM

Hello,

Rep. Campbell called me to say that we “were right” about his surplus funds balance, that it was supposed to be the \$7K amount reported in his 2024 campaign. He explained that he has many many accounts at Machias Savings Bank (“[REDACTED]”), and that they gave him information for the wrong account. Recently he had moved things around (renamed some, if I recall correctly), and so they messed up when he called them for his balance.

He asked if he could just go and amend the report with the correct amount; I said I would confer with you and get back to him.

Erin Gordon
Candidate Registrar

From: Wayne, Jonathan <Jonathan.Wayne@maine.gov>
Sent: Tuesday, May 12, 2026 3:44 PM
To: Gordon, Erin <Erin.Gordon@maine.gov>
Cc: Currier, Martha <Martha.Currier@maine.gov>
Subject: Phone Call with Rep. Dick Campbell

Could you please send me an email documenting your phone call with Rep. Campbell? It doesn't need to be exact, just the general idea. Thanks. I'd like to have a contemporaneous record.

From: Gordon, Erin
Sent: Tuesday, May 12, 2026 3:21 PM
To: Dick Campbell <dickcampbellllc@gmail.com>
Subject: Surplus Balance

Hello, Rep. Campbell,

Thank you for speaking with me this afternoon regarding the amount of your surplus funds from 2024. In order to move forward with the correction to the amount, we ask that you provide us with a copy of the March and April bank statements for your House campaign account, showing the current balance.

With regards to the amount of the late-filing penalty, that will remain the same.

Best,

Erin Gordon
Candidate Registrar
Maine Ethics Commission
(207) 287-3651 | www.maine.gov/ethics
135 State House Station, Augusta, ME 04333-0135
45 Memorial Circle, Augusta, ME

From: [Wayne, Jonathan](#)
To: [Dick Campbell](#)
Cc: [Gordon, Erin](#); [Currier, Martha](#)
Subject: Bank Statement
Date: Friday, May 15, 2026 3:44:00 PM

Rep. Campbell,

I'm following up on the email Erin Gordon sent you on Tuesday after receiving a phone call from you.

If you are able to provide our office with a bank statement from March or April 2026 showing a balance of around \$7,232.71 in the account containing surplus 2024 campaign funds, there would not be any reason for us to investigate your campaign finance reporting in 2022-2024. We will be finalizing the agenda for our next meeting at the end of the day on Monday.

Thank you.

Jonathan Wayne
Executive Director
Maine Ethics Commission
135 State House Station
Augusta, ME 04333
(207) 287-4179

From: Gordon, Erin
Sent: Tuesday, May 12, 2026 3:21 PM
To: Dick Campbell <dickcampbelllllc@gmail.com>
Subject: Surplus Balance

Hello, Rep. Campbell,

Thank you for speaking with me this afternoon regarding the amount of your surplus funds from 2024. In order to move forward with the correction to the amount, we ask that you provide us with a copy of the March and April bank statements for your House campaign account, showing the current balance.

With regards to the amount of the late-filing penalty, that will remain the same.

Best,

Erin Gordon

Candidate Registrar

Maine Ethics Commission

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135 State House Station, Augusta, ME 04333-0135

45 Memorial Circle, Augusta, ME

21-A M.R.S. § 1016. Records

The candidate or treasurer shall keep detailed records of all contributions received and of each expenditure that the treasurer or candidate makes or authorizes, as provided in this section. The treasurer shall certify the completeness and accuracy of the information in any report of contributions and expenditures filed with the commission as required by section 1017.

1. Segregated funds. All funds of a political committee and campaign funds of a candidate must be segregated from, and may not be commingled with, any personal funds of the candidate, treasurer or other officers, members or associates of the committee. Personal funds of the candidate used to support the candidacy must be recorded and reported to the treasurer as contributions to the political committee, or the candidate if the candidate has not authorized a political committee.

2. Report of contributions and expenditures. A person who receives a contribution or makes an expenditure for a candidate or political committee shall report the contribution or expenditure to the candidate or treasurer within 5 days of the receipt of the contribution or the making of the expenditure. A person who receives a contribution in excess of \$10 for a candidate or a political committee shall report to the candidate or treasurer the amount of the contribution, the name and address of the person making the contribution and the date on which the contribution was received.

3. Record keeping. The candidate or treasurer shall keep a detailed and exact account of:

A. All contributions made to or for the candidate or committee, including any contributions by the candidate;

B. The name and address of every person making a contribution in excess of \$10, the date and amount of that contribution and, if a person's contributions in any report filing period aggregate more than \$50, the account must include the contributor's occupation and principal place of business, if any. If the contributor is the candidate or a member of the candidate's immediate family, the account must also state the relationship. For purposes of this paragraph, "filing period" is as provided in section 1017, subsections 2 and 3-A;

C. All expenditures made by or on behalf of the committee or candidate; and

D. The name and address of every person to whom any expenditure is made and the date and amount of the expenditure.

4. Receipts preservation. The candidate or treasurer shall obtain and keep a receipted bill, stating the particulars, for every expenditure in excess of \$50 made by or on behalf of a political committee or a candidate and for any such expenditure in a lesser amount if the aggregate amount of those expenditures to the same person in any election exceeds \$50. The candidate or treasurer shall preserve all receipted bills and accounts required to be kept by this section for 2 years following the final report required to be filed for the election to which they pertain, unless otherwise ordered by the commission or a court.

21-A M.R.S. § 1017. Reports by candidates

1. Federal candidates. [2007, ch. 443, § A-16 (RP).]

2. Gubernatorial candidates. A treasurer of a candidate for the office of Governor shall file reports with the commission as follows. Once the first required report has been filed, each subsequent report must cover the period from the end date of the prior report filed.

A. In any calendar year, other than a gubernatorial election year, in which the candidate or the candidate's political committee has received contributions in excess of \$1,000 or made or authorized expenditures in excess of \$1,000, reports must be filed no later than 11:59 p.m. on July 15th of that year and January 15th of the following calendar year. These reports must include all contributions made to and all expenditures made or authorized by or on behalf of the candidate or the candidate's treasurer as of the end of the preceding month, except those covered by a previous report.

B. Reports must be filed no later than 11:59 p.m. on the 42nd day before the date on which an election is held and must be complete as of the 49th day before that date. If a report was not filed under paragraph A, the report required under this paragraph must cover all contributions and expenditures through the 49th day before the election.

C. Reports must be filed no later than 11:59 p.m. on the 11th day before the date on which an election is held and must be complete as of the 14th day before that date.

D. If the candidate has an opponent who is on the ballot or who is a declared write-in candidate, any single contribution of \$10,000 or more received or any single expenditure of \$10,000 or more made after the 14th day before the election and more than 48 hours before 11:59 p.m. on the day of the election must be reported within 48 hours of that contribution or expenditure. The candidate or 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.

E. Reports must be filed no later than 11:59 p.m. on the 42nd day after the date on which an election is held and must be complete for the filing period as of the 35th day after that date.

F. Unless further reports will be filed in relation to a later election in the same calendar year, the disposition of any surplus or deficit in excess of \$100 shown in the reports described in paragraph E must be reported as provided in this paragraph. The treasurer of a candidate or political committee with a surplus or deficit in excess of \$100 shall file reports semiannually with the commission within 15 days following the end of the 2nd and 4th quarters of the State's fiscal year, complete as of the last day of the quarter, until the surplus is disposed of or the deficit is liquidated. The first report under this paragraph is not required until the 15th day of the period beginning at least 90 days from the date of the election. The reports will be considered timely if filed electronically or in person with the commission on that date or postmarked on that date. The reports must set forth any contributions for the purpose of

liquidating the deficit, in the same manner as contributions are set forth in other reports required in this section.

G. Unless otherwise specified in this subsection, reports must be complete back to the end date of the previous report filing period. The reports described in paragraph E, if filed with respect to a primary election, are considered previous reports in relation to reports concerning a general election.

H. Reports with respect to a candidate who seeks nomination by petition for the office of Governor must be filed on the same dates that reports must be filed with respect to a candidate who seeks that nomination by primary election.

3. Other candidates. [1989, ch. 504, §§ 13, 31 (RP).]

3-A. Other candidates. A treasurer of a candidate for state or county office other than the office of Governor shall file reports with the commission and municipal candidates shall file reports with the municipal clerk as follows. Once the first required report has been filed, each subsequent report must cover the period from the end date of the prior report filed.

A. In any calendar year in which an election for the candidate's particular office is not scheduled, when any candidate or candidate's political committee has received contributions in excess of \$500 or made or authorized expenditures in excess of \$500, reports must be filed no later than 11:59 p.m. on July 15th of that year and January 15th of the following calendar year. These reports must include all contributions made to and all expenditures made or authorized by or on behalf of the candidate or the treasurer of the candidate as of the end of the preceding month, except those covered by a previous report.

B. Reports must be filed no later than 11:59 p.m. on the 11th day before the date on which an election is held and must be complete as of the 14th day before that date. If a report was not filed under paragraph A, the report required under this paragraph must cover all contributions and expenditures through the 14th day before the election.

C. If the candidate has an opponent who is on the ballot or who is a declared write-in candidate, any single contribution received or any single expenditure made after the 14th day before any election and more than 48 hours before 11:59 p.m. on the day of any election that is equal to or greater than the following thresholds must be reported within 48 hours of that contribution or expenditure:

- (1) For a candidate for State Senator, \$5,000;
- (2) For a candidate for county office, \$2,500;
- (3) For a candidate for State Representative, \$1,500; and
- (4) For a candidate for municipal office, \$1,500.

The candidate or 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.

D. Reports must be filed no later than 11:59 p.m. on the 42nd day after the date on which an election is held and must be complete for the filing period as of the 35th day after that date.

D-1. Reports must be filed no later than 11:59 p.m. on the 42nd day before the date on which an election is held and must be complete as of the 49th day before that date, except that this report is not required for candidates for municipal office, unless required by the municipality. Certified candidates and participating candidates, as defined under section 1122, subsections 1 and 6, respectively, are not required to file a report on the 42nd day before a primary election pursuant to this section.

E. Unless further reports will be filed in relation to a later election in the same calendar year, the disposition of any surplus or deficit in excess of \$100 shown in the reports described in paragraph D must be reported as provided by this paragraph. The treasurer of a candidate with a surplus or deficit in excess of \$100 shall file reports semiannually with the commission within 15 days following the end of the 2nd and 4th quarters of the State's fiscal year, complete as of the last day of the quarter, until the surplus is disposed of or the deficit is liquidated. The first report under this paragraph is not required until the 15th day of the period beginning at least 90 days from the date of the election. The reports will be considered timely if filed electronically or in person with the commission on that date or postmarked on that date. The reports must set forth any contributions for the purpose of liquidating the deficit, in the same manner as contributions are set forth in other reports required in this section.

F. Reports with respect to a candidate who seeks nomination by petition must be filed on the same dates that reports must be filed by a candidate for the same office who seeks that nomination by primary election.

3-B. Accelerated reporting schedule. [2011, ch. 558, § 1 (RP).]

4. New candidate or nominee. A candidate for nomination or a nominee chosen to fill a vacancy under chapter 5, subchapter 3 is subject to section 1013-A, subsection 1, except that the candidate shall register the name of a treasurer or political committee and all other information required in section 1013-A, subsection 1, paragraphs A and B within 7 days after the candidate's appointment or at least 6 days before the election, whichever is earlier. The commission shall send notification of this registration requirement and report forms and schedules to the candidate and the candidate's treasurer immediately upon notice of the candidate's and treasurer's appointments.

5. Content. A report required under this section must contain the itemized accounts of contributions received during that report filing period, including the date a contribution was received, and the name, address, occupation, principal place of business, if any, and the amount of the contribution of each person who has made a contribution or contributions aggregating in excess of \$50. The report must contain the itemized expenditures made or authorized during the report filing period, the date and purpose of each expenditure and the name and address of each payee and creditor and any refund that a payee has made to the candidate or an agent of the candidate. If the payee is a member of the candidate's household or immediate family, the candidate shall disclose the candidate's relationship to the payee in a manner prescribed by the commission. The report must contain a statement of any loan to a candidate by a financial institution in connection with that candidate's candidacy that is made during the period covered by the report, whether or not the loan is defined as a contribution

under section 1012, subsection 2, paragraph A. The candidate and the treasurer are jointly and severally responsible for the timely and accurate filing of each required report.

5-A. Valuation of contributions sold at auction. Any contribution received by a candidate that is later sold at auction must be reported in the following manner.

A. If the contribution is sold at auction before the commencement of the appropriate reporting period specified in subsections 2 to 4, or during that period, the value of the contribution is deemed to be the amount of the purchase price paid at auction.

B. If the contribution is sold after the termination of the appropriate reporting period specified in subsections 2 to 4, the value of the contribution is the difference between the value of the contribution as originally reported by the treasurer and the amount of the purchase price paid at auction. Unless further reports are filed in relation to a later election in the same calendar year, the disposition of any net surplus or deficit in excess of \$100 resulting from the difference between the auction price and the original contribution value must be reported in the same manner as provided in subsection 2, paragraph F or subsection 3-A, paragraph E, as appropriate.

6. Forms. Reports required by this section not filed electronically must be on forms prescribed, prepared and sent by the commission to the treasurer of each registered candidate at least 7 days before the filing date for the report. Establishment of or amendments to the campaign report filing forms required by this section must be by rule. Persons filing reports may use additional pages if necessary, but the pages must be the same size as the pages of the form. Although the commission mails the forms for required reports to candidates who are exempt from filing electronically, failure to receive forms by mail does not excuse treasurers, committees and other persons who must file reports from otherwise obtaining the forms or from late filing penalties.

Rules of the commission establishing campaign report filing forms for candidates are routine technical rules as defined in Title 5, chapter 375, subchapter 2-A.

7. Reporting exemption. [1991, ch. 839, § 20 (RP).]

7-A. Reporting exemption. A candidate seeking election to a county or municipal office or a legislative candidate seeking the nomination of a party in an uncontested primary election is exempt from reporting as provided by this subsection.

A. A candidate seeking election to a county or municipal office may, at the time the candidate registers under section 1013-A, notify the commission that the candidate and the candidate's agents, if any, will not personally accept contributions, make expenditures or incur obligations associated with that candidate's candidacy. The notification must be made through an online or written form prescribed by the commission. A candidate who provides this notice to the commission is not required to appoint a treasurer and is not subject to the filing requirements of this subchapter if the statement is true.

A-1. A legislative candidate seeking the nomination of a party in an uncontested primary election may, at the time the candidate registers under section 1013-A, notify the commission that the candidate and the candidate's agents, if any, will not personally accept contributions, make expenditures or incur obligations associated with that candidate's candidacy through the 35th day after the primary election. The notification must be made through an online or written form prescribed by the commission. A candidate who provides

this notice to the commission is not required to appoint a treasurer or to file the campaign finance reports under subsection 3-A, paragraphs B and D with respect to the primary election.

B. The notice provided to the commission under paragraph A or A-1 may be revoked. Prior to revocation, the candidate must appoint a treasurer. The candidate may not accept contributions, make expenditures or incur obligations before the appointment of a treasurer and the filing of a revocation notice are accomplished. A revocation notice must be in the form of an amended registration, which must be filed with the commission no later than 10 days after the appointment of a treasurer. The candidate and the candidate's treasurer, as of the date the revocation notice is filed with the commission, may accept contributions, make expenditures and incur obligations associated with the candidate's candidacy. Any candidate who fails to file a timely revocation notice is subject to the penalties prescribed in section 1020-A, subsection 4-A, up to a maximum of \$5,000. Lateness is calculated from the day a contribution is received, an expenditure is made or an obligation is incurred, whichever is earliest.

8. Disposition of surplus. A candidate or treasurer of a candidate registered under section 1013-A or qualified under sections 335 and 336 or sections 354 and 355 shall dispose of a surplus exceeding \$100 within 4 years of the election for which the contributions were received by:

- A.** Returning contributions to the candidate's or candidate's authorized political committee's contributors, as long as no contributor receives more than the amount contributed;
- B.** A gift to a qualified political party within the State, including any county or municipal subdivision of such a party;
- C.** An unrestricted gift to the State. A candidate for municipal office may dispose of a surplus by making a restricted or unrestricted gift to the municipality;
- D.** Carrying forward the surplus balance to a political committee established to promote the same candidate for a subsequent election;
- D-1.** Carrying forward the surplus balance for use by the candidate for a subsequent election;
- E.** Transferring the surplus balance to one or more other candidates registered under section 1013-A or qualified under sections 335 and 336 or sections 354 and 355, or to political committees established to promote the election of those candidates, provided that the amount transferred does not exceed the contribution limits established by section 1015;
- F.** Repaying any loans or retiring any other debts incurred in the course of the candidate's campaign activity;
- G.** Paying for any expense incurred in the proper performance of the office to which the candidate is elected, as long as each expenditure is itemized on expenditure reports; and
- H.** A gift to a charitable or educational organization that is not prohibited, for tax reasons, from receiving such a gift.

The choice must be made by the candidate for whose benefit the contributions were made.

9. Campaign termination report forms. The commission shall provide each candidate required to report campaign contributions and expenditures with a campaign termination report form. A candidate shall file the campaign termination report with the commission as required in this subsection. The campaign termination report must be complete as of June 30th of the year following the campaign of the previous year. This form must show any deficits or surpluses to be carried over to the next campaign. Funds not carried forward to the next campaign must be disposed of as provided in subsection 8. Campaign reporting is as follows.

A. Candidates with surplus campaign funds following an election shall file termination reports no later than July 15th of the year following the campaign of the previous year.

B. Candidates with a campaign deficit following an election shall file termination reports no later than July 15th of the year following the campaign of the previous year.

C. Candidates with a deficit who will not participate in the next election for the same office shall file semiannual reports until the deficit is liquidated.

D. Candidates who collect funds subsequent to an election for purposes other than retiring campaign debt shall register with the commission pursuant to section 1013-A.

10. Electronic filing. The treasurer of a candidate or committee that has receipts or expects to have receipts of more than \$1,500 shall file each report required by this section through an electronic filing system developed by the commission. The commission may make an exception to this electronic filing requirement if a candidate or committee submits a written request that states that the candidate or committee lacks access to the technology or the technological ability to file reports electronically. The request for an exception must be submitted by April 15th of the election year, except that a candidate registered according to subsection 4 has 10 business days from the date of registration to submit a request to the commission. The commission shall grant all reasonable requests for exceptions.

21-A M.R.S. § 1020-A. Failure to file on time

1. Registration. A candidate that fails to register the name of a candidate, treasurer or political committee with the commission within the time allowed by section 1013-A, subsection 1 may be assessed a forfeiture of \$100. The commission shall determine whether a registration satisfies the requirements for timely filing under section 1013-A, subsection 1.

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 7, the commission shall determine whether a report satisfies the requirements for timely filing. The commission may waive a penalty in whole or in part if the commission determines that the penalty is disproportionate to the size of the candidate's campaign, the level of experience of the candidate, treasurer or campaign staff or 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 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;
- C.** Failure to receive notice of the filing deadline; or
- D.** 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.

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94-270 COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES

Chapter 1: PROCEDURES

SUMMARY: This Chapter describes the nature and operation of the Commission, and establishes procedures by which the Commission's actions will be governed.

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SECTION 4. INITIATION OF PROCEEDINGS

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

A. **Legislator's Own Conduct**

- (1) A Legislator seeking an advisory opinion with respect to his or her own circumstances or conduct should make a written request for an opinion, setting forth the pertinent facts with respect to the legislative matter at issue and the circumstances of the Legislator giving rise to the inquiry.
- (2) The request will be officially filed only when received at the offices of the Commission. The Director will promptly send a copy of the request to the Chair, and the matter will be placed on the agenda for the next Commission meeting, or if necessary, at a special meeting.
- (3) An oral request by a Legislator for an opinion with respect to his or her own circumstances will not be considered an official request for an advisory opinion, and a Legislator making such a request will be so notified, by letter, and encouraged to file a written request.
- (4) The Director may, in his or her discretion, provide advice on legislative ethics issues to a Legislator through more informal means, such as electronic mail, telephone, or letter.

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

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

(2) **Other Complaints**

- (a) The Director will review each complaint to determine whether the matter relates to the Commission's statutory mandate. When a complaint is filed, the Director, in consultation with Commission Counsel, will review the matter to determine whether the complaint has sufficient merit to warrant recommending the calling of a meeting. When a meeting is called, the Commission will determine in executive session whether to hear the complaint. If the nature of the complaint clearly does not fall within the scope of the Commission's jurisdiction, the Director will so notify the complainant by letter within 14 days of receiving the complaint. In such cases, the respondent need not be notified. The Commission may reverse any administrative decision.
- (b) An oral complaint by any person alleging a conflict of interest concerning any legislator does not constitute a complaint under 1 M.R.S. § 1013(2)(B), and a person registering such a complaint will be so notified, by letter.

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

2. **Election Campaign Reporting and *Maine Clean Election Act* Violations**

- A. **Compliance Review.** The Commission staff will review all campaign finance reports filed by candidates pursuant to 21-A M.R.S., chapters 13 and 14 to verify compliance with the financial disclosure and documentation requirements set by statute or rule. The staff will review a selection of other campaign finance reports filed by non-candidate committees with the Commission for compliance with legal requirements. Notice of any omission, error, or violation will be given to the filer by electronic mail or U.S. Mail. The Commission staff will establish a reasonable time period for the filer to remedy any omission or error. The Commission staff shall schedule any substantial violations for possible action by the Commissioners at a public meeting. If the filer fails to remedy minor violations, the Commission staff will use its discretion whether to take any further action. Minor violations include, but are not limited to, failing to report the employment information for a contributor or misusing an expenditure code to describe the purpose of an expenditure.
- B. **Late Reports and Registrations.** Where required by statute, notice of failure to file a required report will be timely sent by Commission staff. When a report or registration is filed late, the Director's recommendations will be based on the following considerations:
 - (1) Lateness of report or registration,
 - (2) Reason for lateness,

- (3) Kind of report (more stringent application for pre-election reports),
 - (4) Amount of campaign funds not properly reported,
 - (5) Previous record of the filer; and
 - (6) Good faith effort of the filer to remedy the matter.
- C. Any person (as defined in 21-A M.R.S. § 1001(3)) may make an official complaint or request for a Commission investigation by filing a signed written request at the Commission's office, setting forth such facts with sufficient details as are necessary to specify the alleged violation. A copy of the signed request may be filed by facsimile or by electronic mail. Statements should be made upon personal knowledge. Statements which are not based upon personal knowledge must identify the source of the information which is the basis for the request, so that respondents and Commission staff may adequately respond to the request. A copy of any such written request will be promptly transmitted to the candidate or organization alleged to have violated the statutory requirements. The Director may conduct preliminary fact finding to prepare a matter for presentation to the Commission. The Director, in consultation with Counsel, will prepare a summary of staff findings and recommendations for inclusion on the agenda.
- D. An oral report of a violation, or a written request containing insufficient detail to specify the violation charged, does not constitute an official request for a Commission determination, and a person registering such a complaint will be so notified.
- E. The signature of a person authorized to sign a report or form constitutes certification by that person of the completeness and accuracy of the information reported. The use of a password in filing an electronic report constitutes certification of the completeness and accuracy of the report.

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