



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

Commission Meeting 09/30/2020
Agenda Item #3

To: Commissioners
From: Jonathan Wayne, Executive Director
Date: September 22, 2020
Re: Complaint by Rommy Haines against Rep. Harold Stewart III

In 2016, Harold (“Trey”) Stewart III was elected to serve in the Maine House of Representatives. He is now completing his second term. His House district (#147) covers most of Presque Isle. Since December 2018, he has served as the assistant leader of the House Republican caucus. He is now the Republican candidate for State Senate, District 2.

In August 2017, he formed the Star City PAC and served as its principal officer. He resigned from that position in March 2020, when he chose to run as a Maine Clean Election Act candidate for the State Senate. Mr. Rommy Haines of Fort Fairfield, Maine has filed a complaint alleging that in 2018 and 2019 Star City PAC made four impermissible expenditures for clothing, tires and vehicle maintenance to benefit Rep. Stewart. ETH-1. The Representative responds that the vehicle services were allowed because they were associated with campaign travel when volunteering for the PAC (*i.e.*, helping elect House Republican candidates) and the two clothing purchases at Target were expenses incurred in the performance of his duties as a Legislator (*i.e.*, required for political events that kept him from returning to his district). ETH-6-7.

Relevant Law

Standard for Initiating an Investigation

The Commission is required to review every request to investigate an alleged violation of campaign finance law and to conduct an “investigation if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred.”

21-A M.R.S. § 1003(2).

PACs Led by Legislators

Some Legislators decide to form a PAC to be involved in electoral activities other than their own election, to pay for travel or other expenses incurred while performing their duties as a Legislator, or to pay for costs associated with being a leader of their caucus. These are sometimes referred to in the press or other places as “leadership PACs,” although that is not a defined term in law. ETH-8.

Restrictions on Payments by PACs to a Legislator

In 2017, the Maine Legislature adopted a law, 21-A M.R.S. § 1054-B, which prohibits certain categories of payments by a PAC to a Legislator, if the Legislator is a principal officer or treasurer of the PAC or one of the individuals primarily responsible for making decisions or raising contributions for the PAC. ETH-9. Under this provision, the PAC could not:

- compensate the Legislator for services to the committee, or
- make payments to a business owned or operated by the Legislator.

In 2019, the Legislature amended the statute to also forbid commingling PAC funds with the Legislator’s personal funds or the funds of a business owned or operated by the Legislator. A short history of the statute is attached. ETH-10.

Since it was enacted in 2017, the statute has explicitly allowed a PAC to reimburse the Legislator for certain expenses incurred by the Legislator:

- expenses in the proper performance of duties of the Legislator;
- purchases made on behalf of the committee; and
- travel expenses associated with volunteering for the committee.

The allowable reimbursements do not include, however, “payments from the committee that are determined by the commission to be for the purpose of personal financial enrichment of the Legislator.” 21-A M.R.S. § 1054-B.

Complaint by Rommy Haines

On September 3, 2020, Rommy Haines filed a complaint concerning four expenditures by the Star City PAC in 2018 and 2019. ETH-1. At that time, Rep. Stewart was the principal officer of the PAC.¹ The PAC reported the payments as follows:

Date	Payee Name	Description of Purpose	Amount
8/6/2018	Percy's Auto Sales	Vehicle maintenance/tire replacement for travel around Maine related to campaigns	\$770.39
11/14/2018	Target	Spare clothes for Augusta work	\$150.79
3/1/2019	Target	Spare clothes for extended, unanticipated travel to Augusta	\$59.65
7/14/2019	VIP Tires and Service	Tires and service for vehicle	\$1,051.92

The cover pages and operating expenditure schedules for the relevant reports are attached as ETH 11-20. Mr. Haines characterizes these payments as “clear violations of the personal enrichment statute that prevents legislators for enriching themselves with funds intended for campaigns.” ETH-1. He states: “You cannot raise money under the guise of elections, and then turn around and buy yourself fancy tires and new clothes.”

Response by Rep. Stewart

In his response, Rep. Stewart confirms Star City PAC's reporting of expenses is accurate. ETH 6-7. When he made the purchases, he believed they were legitimately related to his official duties and conducting PAC activities, and were allowed under 21-A M.R.S. § 1054-B. He explains that he paid for the vehicle and clothing expenses with a personal credit card, and then he submitted the expenses on a periodic basis for reimbursement.

With regard to the two purchases of clothing, Rep. Stewart writes: “both purchases were made as a direct result of [his] political obligations and specifically within my leadership

¹ When a PAC registers with the Commission, it is required to designate two people as the PAC's “principal officer” and “treasurer,” and disclose any other individuals who are primarily responsible for raising contributions or making decisions for the PAC. 21-A M.R.S. § 1052-A(2).

role” which was why he formed the PAC. The earlier expenditure (\$150.79) was made directly after being elected by his caucus as assistant leader in November 2018, which entailed staying in Augusta “for the remainder of the week.” The second purchase (\$59.65) was because he had to stay in Augusta longer than originally anticipated and needed clothes for a political event the following day. ETH-7. (According to Google Maps, Presque Isle is 235 miles from the State House, which is a three hour, 41-minute drive.)

Rep. Stewart describes the tire purchases as follows:

On the two instances where replacement tires were purchased and mounted, this reimbursement was made in a good faith belief that these expenses were incurred associated with travel related to the role within the leadership PAC. As one would expect, running a successful leadership race from Aroostook County requires thousands of miles to be put on one’s car from the purposes of this endeavor. I chose this manner of expense reimbursement rather than a direct mileage reimbursement as a means to keep overall PAC expenses that were not related directly to campaigns as minimal as possible, thereby ensuring the maximum amount of funds to benefit Republican House candidates, as was the purpose of the leadership PAC.

ETH-6. He urges the Commission not to conduct an investigation, since the purchases do not violate any Maine law.

Analysis by Commission Staff

For context, a political action committee is a fund established for political purposes and is required under the Election Law to register and file finance reports with the Commission. Most of the 135 PACs registered with the Commission were set up to influence candidate or ballot question elections. Some Legislators have chosen to form a leadership PAC to pay for travel or other expenses associated with serving in the Maine Legislature, or costs associated with being a leader of their caucus. The Commission staff has designated 24 PACs as leadership PACs. Although Rep. Stewart is an elected leader of his caucus, most Legislators who have formed a leadership PAC are not leaders of their caucus. Maine Clean Election Act candidates may not establish their own leadership PAC, but they may

be officers or decision-makers for the PAC established by their legislative caucus to promote their nominees.

All PACs are funded with private contributions. PACs are not funded with public money. If an officer or someone else seeks reimbursement from a PAC, the reimbursements are not governed by the same standards that apply to:

- a Legislator seeking to be reimbursed with public funds from the Legislature, or
- a candidate seeking reimbursement for a campaign expense from their Maine Clean Election Act-funded campaign.

As noted above, Rep. Stewart began serving his first term in December 2016. He formed Star City PAC in August 2017, and was the principal officer of the PAC until March 2020. In 2018, he was a candidate for re-election. In 2018, he apparently also performed campaign services for other candidates and was seeking a leadership position in his caucus. He was elected assistant leader of his caucus in November 2018 and began serving his second term in December 2018. He is now running for State Senate in District 2.

In considering whether the clothing and vehicle-related purchases were a misuse of PAC funds under 21-A M.R.S. § 1054-B, the Commission staff recommends adhering closely to what is prohibited in statute. If you find that any of the prohibitions in § 1054-B are ambiguous or vague, we caution against interpreting the prohibitions with a wide scope.

With respect to the two clothing purchases at Target, Rep. Stewart has attributed these expenditures to two particular events arising out of serving as assistant leader of the House Republican caucus. The Commission staff believes it is reasonable to view these purchases as “expenses incurred in the proper performance of [the] duties of a Legislator.” Even if most Legislators do not turn to other sources to pay for clothing related to holding office, Rep. Stewart has drawn a direct connection these particular purchases and serving in the Legislature.

With regard to the vehicle-related purchases, at your September 30 meeting you may wish to ask for additional factual information to verify that these were associated with PAC activities and do not constitute personal financial enrichment. For example, you could inquire into the extent of Rep. Stewart's PAC-related travel from August 2018 through July 2019,² and whether the "vehicle maintenance" services by Percy's Auto Sales were strictly related to mounting tires. Nevertheless, because Rep. Stewart lives in Presque Isle, the Commission staff believes it is plausible that volunteering for the PAC (*i.e.*, helping other House Republican candidates) could entail a large amount of wear and tear on a vehicle. The provision in § 1054-B that allow PAC funds to reimburse "travel expenses associated with volunteering for the [PAC]" is not limited to the cost of fuel and does not require the reimbursement to be calculated on a per-mile basis. It would be possible to adopt these restrictions, but we believe the restrictions should be adopted prospectively and in writing so that Legislators have advance guidance on the allowability of certain travel expenses.

The Commission staff appreciates that some members of the public are sensitive to the appearance that anyone is receiving political contributions by virtue of their public office and then using those funds for personal expenses. If the Maine Legislature wishes to adopt clarifications, limits or prohibitions on types of PAC expenses to Legislators, the Commission staff is ready to contribute in any way that it can through research, legislative drafting, etc. Our general understanding is that some states limit expenditures of political funds by a candidate or political committee for clothing, vehicle expenses, food, or payments to family or household members. Also, if you find that the current statute is ambiguous, the Commission may be able to address this through rule-making although you may wish to take a more restrained role and allow the Legislature to adopt these standards itself.

Thank you for your consideration of this memo.

² Rep. Stewart made two purchases of tires in a little less than a year.

September 5th, 2020

By Email

Mr. Jonathan Wayne
Executive Director
Maine Commission on Governmental Ethics & Election Practices
135 State House Station
Augusta, ME 04333

RE: Complaint Against Trey Stewart, Candidate for Senator, District 2 and Star City PAC

Dear Mr. Wayne,

My name Rommy Haines and I live in Senate District 2 at 26 West-Haines Drive Fort Fairfield, Maine.

I'd like to file an official ethics complaint against Trey Stewart and Star City PAC for personal enrichment.

On 7/14/19 he spent \$1,051.92 on new tires at VIP tires and services in Presque Isle.

On 8/6/18 Percy Auto Sales he spent 770.39 on tire replacement at Percy Auto Sales.

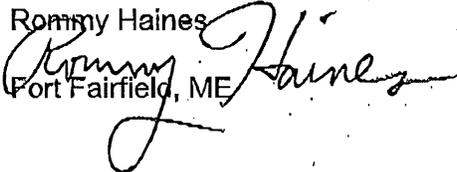
Additionally, he spent his funds on new clothes at target on two occasions, 3/1/19 59.65 at the Augusta Target and 11/14/18 he spent \$150.79 at the same Target.

As I understand it these are clear violations of the personal enrichment statute that prevents legislators for enriching themselves with funds intended for campaigns. You can't raise money under the guise of elections, and then turn around and buy yourself fancy tires and new clothes.

Thanks for your consideration,

Rommy Haines

Fort Fairfield, ME





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

September 4, 2020

By Email and U.S. Mail

Hon. Harold L. Stewart III
312 State Street
Presque Isle, ME 04769

Dear Rep. Stewart:

Yesterday, the Maine Commission on Governmental Ethics and Election Practices received the enclosed complaint by Mr. Rommy Haines against you and the Star City PAC concerning four expenditures by the PAC in 2018-2019. At that time, you were the principal officer of the PAC. The PAC reported the payments as follows:

Date	Payee Name	Description of Purpose	Amount
8/6/2018	Percy's Auto Sales	Vehicle maintenance/tire replacement for travel around Maine related to campaigns	\$770.39
11/14/2018	Target	Spare clothes for Augusta work	\$150.79
3/1/2019	Target	Spare clothes for extended, unanticipated travel to Augusta	\$59.65
7/14/2019	VIP Tires and Service	Tires and service for vehicle	\$1,051.92

Mr. Haines characterizes these payments as “clear violations of the personal enrichment statute that prevents legislators for enriching themselves with funds intended for campaigns. You cannot raise money under the guise of elections, and then turn around and buy yourself fancy tires and new clothes.”

This letter is to invite you to respond to the complaint and to provide any factual information or argument that you believe is relevant. The Commission staff has tentatively scheduled this matter for a meeting on September 30, 2020, but we can reschedule the complaint for a later meeting if you need additional time to respond.

Relevant Law

Standard for Initiating an Investigation

The Commission is required to review every request to investigate an alleged violation of campaign finance law and to conduct an “investigation if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred.”

21-A M.R.S. § 1003(2).

Restrictions on Payments by PACs to a Legislator

Maine’s campaign finance law contains a statute that prohibits certain categories of payments by a PAC to a Legislator, if the Legislator is a principal officer or treasurer of the PAC or one of the individuals primarily responsible for making decisions or raising contributions for the PAC. Under this provision, the PAC may not:

- compensate the Legislator for services to the committee;
- make payments to a business owned or operated by the Legislator; or
- commingle PAC funds with the Legislator’s personal funds or the funds of a business owned or operated by the Legislator.¹

The statute allows the committee to reimburse the Legislator for certain expenses incurred by the Legislator:

- expenses in the proper performance of duties of the Legislator;
- purchases made on behalf of the committee; and
- travel expenses associated with volunteering for the committee.

The allowable reimbursements do not include, however, “payments from the committee that are determined by the commission to be for the purpose of financial enrichment of the Legislator.” 21-A M.R.S. § 1054-B.

¹ I have attached the current version of 21-A M.R.S. § 1054-B. Please note that the italicized language took effect on September 19, 2019 and was not in effect at the time the PAC made the 2018-2019 expenditures to VIP Tires and Service, Percy’s Auto Sales, and Target.

Request for Response

The Commission staff has tentatively scheduled Mr. Haines' complaint for consideration by the Commission at its meeting on Wednesday, September 30, 2020. The meeting will be conducted by Zoom videoconference. The meeting will begin at 9:00 a.m. and will include a number of late-filing and enforcement matters.

If possible, please submit a written response to the complaint by Thursday, September 17, 2020. You are welcome to include any factual information or argument you believe the Commission would find helpful. In addition, please address the following points:

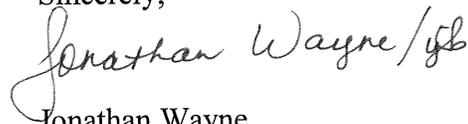
- Did the PAC make the payments directly to Target, VIP Tires and Service, and Percy's Auto Sales, or did the PAC reimburse you for these expenses? Please confirm whether the dates and amounts are correct.
- Please explain the connection between these expenses and your position in the Legislature and/or your activities for the PAC.

You are also welcome to address whether these expenditures violated 21-A M.R.S. 1054-B.

If you do not have sufficient time to respond by September 17, the Commission can postpone this matter until a meeting in mid-October on a date to be determined.

Thank you for your cooperation with this request.

Sincerely,

A handwritten signature in cursive script that reads "Jonathan Wayne" followed by a small mark that appears to be "jwb".

Jonathan Wayne
Executive Director

cc: Mr. Rommy Haines

21-A M.R.S. § 1054-B. Payments to Legislators by political action committees

If a Legislator is a principal officer or treasurer of a political action committee or is one of the individuals primarily responsible for raising contributions or making decisions for the political action committee, the committee may not compensate the Legislator for services provided to the committee. The committee may not make payments *or distribute, loan, advance, deposit or gift money or anything of value* to or compensate a business owned or operated by the Legislator. The committee may reimburse the Legislator for expenses incurred in the proper performance of the duties of the Legislator, for purchases made on behalf of the committee and for travel expenses associated with volunteering for the committee. Allowable reimbursement for expenses does not include payments from the committee that are determined by the commission to be for the purpose of personal financial enrichment of the Legislator. *The funds of the committee may not be commingled with the personal funds of the Legislator or the funds of a business owned or operated by the Legislator.*

Note: please note that the above language is the current version of the statute. The italicized language was not in effect at the time of the four 2018-2019 expenditures at issue in the complaint. The italicized language was inserted by P.L. 2019, Chapter 21, which took effect September 19, 2019.

Rep. Harold "Trey" Stewart III
312 State Street
Presque Isle, Maine 04769

September 23, 2020

Jonathan Wayne
Maine Ethics Commission
135 State House Station
Augusta, Maine 04333

InRe: Haines ethics complaint letter

Dear Mr. Wayne,

Please accept this letter as my response to your letter dated September 4, 2020 enclosing a complaint filed by Romney Haines (said complaint being incorrectly dated September 5, 2020).

Mr. Haines alleges that four expenditures of the Star City Political Action Committee (PAC) violated Maine law. I respectfully disagree. The questioned expenditures were all related either to the proper performance of my committee duties or were travel related expenses associated with such activities. It was, and is, my good faith belief that each reimbursed expenditure is allowed under PAC laws and rules.

In response to your specific questions, please consider the following:

The expenses in question were reimbursed after being incurred on my personal credit card, and then submitted to the PAC for reimbursement after the fact on a periodic basis.

The PAC reports are accurate as to their amounts and purposes.

On the two instances where replacement tires were purchased and mounted, this reimbursement was made in a good faith belief that these expenses were incurred associated with travel related to the role within the leadership PAC. As one would expect, running a successful leadership race from Aroostook County requires thousands of miles to be put on one's car for the purposes of this endeavor. I chose this manner of expense reimbursement rather than a direct mileage reimbursement as a means to keep overall PAC expenses that were not related directly to campaigns as minimal as possible, thereby ensuring the maximum amount of funds to benefit Republican House candidates, as was the purpose of the leadership PAC.

As for the two expenditures at Target in Augusta, both were directly related to my political duties. The first expenditure (dated 11/14/18) was immediately following my successful leadership race, which required me to remain in Augusta longer than

anticipated. As such, I required clean clothes for the remainder of the week, which was why I went to Target to purchase simple items like socks, underwear, collared shirt, etc. The second purchase on (dated 3/1/19) was a similar situation, where I had political duties that required me to stay downstate longer than originally anticipated and again had to purchase clean clothes for a political event the following day, as I did not have time to get home and pack a new bag. Again, both purchases were made as a direct result of my political obligations and specifically within my leadership role, which was the purpose of the formation of the PAC.

As you are well aware, I've had frequent communications with you and your staff about my obligations formerly as a principal officer of the Star City PAC and presently in my candidacy as a Clean Elections candidate for the State Senate. I'm distinctly aware that there are different expenditure requirements that apply to PACs that do not apply to Clean Elections candidates, per our statutes. For these reasons, I am requesting that the Commission deny Mr. Haines' request to investigate the above expenditures as they do not violate any laws in Maine.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to be 'Trey Stewart III', written in a cursive style.

Rep. Harold "Trey" Stewart III
Asst. House Republican Leader

Title 21-A Maine Revised Statutes

Current with the Second Regular Session of the 129th Maine Legislature.

§ 1052. Definitions

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

...

5. Political action committee. The term “political action committee:”

A. Includes:

- (1) Any separate or segregated fund established by any corporation, membership organization, cooperative or labor or other organization whose purpose is to initiate or influence a campaign;
- (4) Any person, including any corporation or association, other than an individual, that has as its major purpose initiating or influencing a campaign and that receives contributions or makes expenditures aggregating more than \$1,500 in a calendar year for that purpose; and
- (5) Any person, other than an individual, that does not have as its major purpose influencing candidate elections but that receives contributions or makes expenditures aggregating more than \$5,000 in a calendar year for the purpose of influencing the nomination or election of any candidate to political office; and

B. Does not include:

- (1) A candidate or a candidate’s treasurer under section 1013-A, subsection 1;
- (2) A candidate’s authorized political committee under section 1013-A, subsection 1, paragraph B;
- (3) A party committee under section 1013-A, subsection 3; or
- (4) An organization whose only payments of money in the prior 2 years for the purpose of influencing a campaign in this State are contributions to candidates, party committees, political action committees or ballot question committees registered with the commission or a municipality and that has not raised and accepted any contributions during the calendar year for the purpose of influencing a campaign in this State.

...

§ 1054-B. Payments to Legislators by political action committees

If a Legislator is a principal officer or treasurer of a political action committee or is one of the individuals primarily responsible for raising contributions or making decisions for the political action committee, the political action committee may not compensate the Legislator for services provided to the political action committee. The political action committee may not make payments or distribute, loan, advance, deposit or gift money or anything of value to or compensate a business owned or operated by the Legislator. The political action committee may reimburse the Legislator for expenses incurred in the proper performance of the duties of the Legislator, for purchases made on behalf of the political action committee and for travel expenses associated with volunteering for the political action committee. Allowable reimbursement for expenses does not include payments from the political action committee that are determined by the commission to be for the purpose of personal financial enrichment of the Legislator. The funds of the political action committee may not be commingled with the personal funds of the Legislator or the funds of a business owned or operated by the Legislator.

History of 21-A M.R.S. § 1054-B

127th Legislature (2015-2016)

- In 2015, the Ethics Commission proposed an agency bill, [L.D. 1123](#), which sought to amend Maine’s campaign finance law in several different areas.
- One of the provisions in L.D. 1123 (§ 16) was a proposed § 1054-B that would prohibit PACs led by Legislators from compensating Legislators or members of their immediate family or household for labor provided to the PAC.
- In 2015, L.D. 1123 was passed to be enacted in both chambers of the Maine Legislature. The proposed § 1054-B, as proposed by the Commission, was not amended.
- Governor LePage vetoed L.D. 1123. The veto was sustained by the Senate.

128th Legislature (2017-2018)

- In 2017, several members of the Joint Standing Committee on Veterans and Legal Affairs proposed [L.D. 543](#).
- L.D. 543 also proposed a version of § 1054-B that was similar to the Commission’s 2015 proposal, except that it included a restriction that PACs could not make payments to or compensate a business owned by a Legislator.
- The sponsors include Rep. Louis Luchini (House Chair of the VLA), Sen. Garrett Mason, and Representatives Bradlee Farrin, John Schneck and Thomas Longstaff.
- L.D. 543 became law as P.L. 2017, [Chapter 98](#), and took effect in September 2017.

129th Legislature (2019-2020)

- In 2019, Senator Justin Chenette proposed [L.D. 256](#).
- The bill prohibited a PAC from lending money to or giving anything of value to a business owned or operated by a Legislator.
- The bill also prohibited commingling PAC funds with the personal funds of a Legislator or the funds of a business owned or operated by a Legislator.
- L.D. 256 became law as P.L. 2019, [Chapter 21](#), which took effect September 2019.



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

2018 CAMPAIGN FINANCE REPORT
FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
Star City PAC PO Box 5341 Augusta, ME, 04332 PHONE:(207) 227-0569 EMAIL: stewartforpresqueisle@gmail.com		Ginger Wenzel Kieffer PO Box 5341 Augusta, ME, 04332 PHONE:(207) 227-0569 EMAIL: STEWARTFORPRESQUEISLE@GMAIL.COM	
REPORT	DUE DATE	REPORTING PERIOD	
OCTOBER QUARTERLY REPORT	10/05/2018	07/18/2018 - 09/30/2018	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$3,700.00	\$8,825.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$3,700.00	\$8,825.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$12,057.88	\$15,886.71
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$12,057.88	\$15,886.71
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$21,519.42	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$3,700.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$12,057.88	
12. CASH BALANCE AT END OF PERIOD	\$13,161.54	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

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

REPORT FILED BY: Star City PAC
 REPORT FILED ON: 10/4/2018 11:15:57 PM
 LAST MODIFIED:
 COMMITTEE ID: 5648

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
7/20/2018	Walmart Supercenter 781 MAIN STREET PRESQUE ISLE, ME, 04769	Fundraiser materials for event.	FND	\$191.82
7/20/2018	Circle K 800 Main Street Presque Isle, ME, 04769	Propane for grill for food at fundraiser	OTH	\$59.99
7/21/2018	GOOGLE DOMAINS, GOOGLE, INC 1600 AMPITHEATRE PARKWAY MOUNTAIN VIEW, CA, 94043	Website/email domain	WEB	\$5.28
7/21/2018	Lowes Presque Isle 135 Maysville St Presque Isle, ME, 04769	Staple gun and staples for lawn signs for parades	OTH	\$34.27
8/1/2018	MARYANNE KINNEY 40 MAPLE LN KNOX, ME, 04986	General contribution	CON	\$400.00
8/6/2018	Percy's Auto Sales 40 Houlton Rd Presque Isle, ME, 04769	Vehicle maintenance/tire replacement for travel around Maine related to campaigns	TRV	\$770.39
8/6/2018	Ginger Kieffer 47 UNIVERSITY ST PRESQUE ISLE, ME, 04769	Consulting and assistance with PAC operations	CNS	\$1,325.92
8/17/2018	david haggan 11 WESTBROOK TERRACE HAMPDEN, ME, 04444	General contribution	CON	\$400.00
8/18/2018	Garrel Robert Craig 50 Canterbury Road Brewer, ME, 04412	General contribution	CON	\$400.00
8/19/2018	William "Billy Bob" Faulkingham PO BOX 121 WINTER HARBOR, ME, 04693	General contribution	CON	\$400.00



Commission on Governmental Ethics and Election Practices
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2018 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
Star City PAC PO Box 5341 Augusta, ME, 04332 PHONE:(207) 227-0569 EMAIL: stewartforpresqueisle@gmail.com		Ginger Wenzel Kieffer PO Box 5341 Augusta, ME, 04332 PHONE:(207) 227-0569 EMAIL: STEWARTFORPRESQUEISLE@GMAIL.COM	
REPORT	DUE DATE	REPORTING PERIOD	
42-Day Post-General Report	12/18/2018	10/24/2018 - 12/11/2018	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$24,134.00	\$35,559.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$24,134.00	\$35,559.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$3,000.00	\$9,790.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$18,147.42	\$41,343.77
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$21,147.42	\$51,133.77
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$1,661.90	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$24,134.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$21,147.42	
12. CASH BALANCE AT END OF PERIOD	\$4,648.48	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

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

REPORT FILED BY: Harold Lloyd Stewart
 REPORT FILED ON: 12/18/2018 5:48:46 PM
 LAST MODIFIED:
 COMMITTEE ID: 5648

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/24/2018	Emily Rousseau 280 Pool St Biddeford, ME, 04005	General contribution	CON	\$400.00
10/24/2018	LEADERSHIP FOR MAINE'S FUTURE P.O. Box 476 Newport, ME, 04953	Contribution to PAC	CON	\$250.00
10/24/2018	Pamela Diane Buck 137 Grammar Street Sanford, ME, 04073	General contribution	CON	\$200.00
10/25/2018	Scott Walter Strom 176 Summer Court Pittsfield, ME, 04967	General contribution	CON	\$400.00
11/1/2018	Danny Edward Costain 292 Ridge Road Plymouth, ME, 04969	General contribution.	CON	\$400.00
11/1/2018	LEADERSHIP FOR MAINE'S FUTURE P.O. Box 476 Newport, ME, 04953	Contribution to PAC	CON	\$13,000.00
11/1/2018	Matthew Gary Pouliot 99 Winthrop Street Augusta, ME, 04330	General contribution.	CON	\$400.00
11/2/2018	Bradley's Citgo 46 North St Presque Isle, ME, 04769	Gas	TRV	\$69.90
11/3/2018	Channel X Radio 152 E Green Ridge Rd Caribou, ME, 04769	Radio ads	RAD	\$1,999.00
11/7/2018	Cafe Sorpreso 415 MAIN ST PRESQUE ISLE, ME, 04769	Food for thank-you dinner	FOD	\$127.38
11/8/2018	Sebago Brewing Co 29 Elm St Gorham, ME, 04038	Food for meeting	FOD	\$93.03

11/8/2018	Daigle Oil Co 50 Bangor St Houlton, ME, 04730	Gas	TRV	\$39.56
11/8/2018	Homewood Suites 377 WESTERN AVE AUGUSTA, ME, 04330	Hotel on 11/8/18	TRV	\$102.46
11/12/2018	Kenoco 363 Western Ave Augusta, ME, 04330	Gas	TRV	\$49.03
11/12/2018	Homewood Suites 377 WESTERN AVE AUGUSTA, ME, 04330	Lodging in Augusta (total amount of 239.80, minus legislative reimbursement of \$55/night for lodging).	TRV	\$129.80
11/14/2018	Target 119 CROSSING WAY AUGUSTA, ME, 04330	Spare clothes for Augusta work	OTH	\$150.79
11/14/2018	Senator Inn and Spa 284 WESTERN AVE AUGUSTA, ME, 04330	Coffee for meeting	FOD	\$11.96
11/15/2018	Hampton Inn 388 Western Ave Augusta, ME, 04330	Lodging in Augusta 11/15-11/17 (total cost of 153.69 minus \$55/night lodging reimbursement).	TRV	\$43.69
11/19/2018	American Airlines 4255 AMON CARTER BOULEVARD FT WORTH, TX, 76155	Flight to DC for meeting	TRV	\$259.68
11/23/2018	GOOGLE DOMAINS, GOOGLE, INC 1600 AMPITHEATRE PARKWAY MOUNTAIN VIEW, CA, 94043	Domain for website	WEB	\$5.00
12/1/2018	Starbucks 274 Western Ave Augusta, ME, 04330	Coffee for meeting	FOD	\$16.14
TOTAL OPERATING EXPENDITURES				\$18,147.42



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

2019 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
Star City PAC PO Box 5341 Augusta, ME, 04332 PHONE:(207) 227-0569 EMAIL: stewartforpresqueisle@gmail.com		Ginger Wenzel Kieffer PO Box 5341 Augusta, ME, 04332 PHONE:(207) 227-0569 EMAIL: STEWARTFORPRESQUEISLE@GMAIL.COM	
REPORT	DUE DATE	REPORTING PERIOD	
April Quarterly Report	04/10/2019	01/01/2019 - 03/31/2019	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$0.00	\$0.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$0.00	\$0.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$740.00	\$740.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$740.00	\$740.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$3,623.48	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$0.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$740.00	
12. CASH BALANCE AT END OF PERIOD	\$2,883.48	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

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

REPORT FILED BY: Harold Lloyd Stewart
 REPORT FILED ON: 4/7/2019 1:39:19 PM
 LAST MODIFIED:
 COMMITTEE ID: 5648

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES			
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs
WEB	Online advertising, website design, maintenance, hosting, etc.		

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
1/4/2019	United States Postal Service 40 WESTERN AVE AUGUSTA, ME, 04330	Roll of stamps.	POS	\$50.00
1/11/2019	Cumberland Farms Gas Station 65 Madison Ave Skowhegan, ME, 04976	Gas to follow MDF bus tour.	TRV	\$50.07
1/22/2019	GOOGLE DOMAINS, GOOGLE, INC 1600 AMPITHEATRE PARKWAY MOUNTAIN VIEW, CA, 94043	January domain fee.	WEB	\$5.00
1/27/2019	Thomas Michael White 338 Birch Street Apartment A Bangor, ME, 04401	Contribution to White for House.	CON	\$400.00
2/7/2019	Harold Stewart, III 312 STATE STREET PRESQUE ISLE, ME, 04769	Gas and valet charge for Maine State Chamber event at Sunday River.	TRV	\$45.00
2/22/2019	GOOGLE DOMAINS, GOOGLE, INC 1600 AMPITHEATRE PARKWAY MOUNTAIN VIEW, CA, 94043	February domain fee.	WEB	\$5.00
3/1/2019	Margaritas Mexican Restaurant 390 WESTERN AVE AUGUSTA, ME, 04330	Food for dinner meeting with PAC Treasurer.	FOD	\$59.68
3/1/2019	Target 119 CROSSING WAY AUGUSTA, ME, 04330	Spare clothes for extended, unanticipated travel to Augusta.	OTH	\$59.65
3/2/2019	Harold Stewart, III 312 STATE STREET PRESQUE ISLE, ME, 04769	Gas reimbursement for travel to Penobscot County Lincoln Day Dinner and back to Augusta.	TRV	\$35.00
3/12/2019	Senator Inn and Spa 284 WESTERN AVE AUGUSTA, ME, 04330	Food for dinner meeting with Theresa Fowler.	FOD	\$25.60
3/22/2019	GOOGLE DOMAINS, GOOGLE, INC 1600 AMPITHEATRE PARKWAY MOUNTAIN VIEW, CA, 94043	March domain fee.	WEB	\$5.00
TOTAL OPERATING EXPENDITURES				\$740.00



Commission on Governmental Ethics and Election Practices
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2019 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
Star City PAC PO Box 5341 Augusta, ME, 04332 PHONE:(207) 227-0569 EMAIL: stewartforpresqueisle@gmail.com		Tom E Gagnon PO Box 774 Presque Isle, ME, 04769 PHONE:(207) 551-6139 EMAIL: tom.gagnon@hotmail.com	
REPORT	DUE DATE	REPORTING PERIOD	
October Quarterly Report	10/07/2019	07/01/2019 - 09/30/2019	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$9,400.00	\$9,400.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$9,400.00	\$9,400.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$6,686.19	\$8,767.06
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$6,686.19	\$8,767.06
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$1,542.61	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$9,400.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$6,686.19	
12. CASH BALANCE AT END OF PERIOD	\$4,256.42	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

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

REPORT FILED BY: Harold Lloyd Stewart
 REPORT FILED ON: 10/6/2019 11:37:42 AM
 LAST MODIFIED:
 COMMITTEE ID: 5648

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
7/3/2019	The M Room Sports Pub 416 Oxbow Rd Palmyra, ME, 04965	Food for meeting	FOD	\$27.92
7/10/2019	Weebly 564 PACIFIC AVE SAN FRANCISCO, CA, 94133	Website design fee	WEB	\$48.00
7/14/2019	VIP Tires and Service 755 Main Street Presque Isle, ME, 04769	Tires and service for vehicle	TRV	\$1,051.92
7/15/2019	United Airlines 609 Main Street Houston, TX, 77002	Flights for conference	TRV	\$823.60
7/18/2019	Go Daddy 14455 N HAYDEN RD SCOTTSDALE, AZ, 85260	Website hosting fee	WEB	\$30.34
7/19/2019	Save-A-Lot 76 Parsons St Presque Isle, ME, 04769	Food for fundraiser	FOD	\$251.32
7/19/2019	Walmart Supercenter 781 MAIN STREET PRESQUE ISLE, ME, 04769	Food and supplies for fundraiser	FND	\$157.77
7/19/2019	Billy Bob Faulkingham P.O. Box 121 Winter Harbor, ME, 04693	Lobster for fundraiser.	FOD	\$170.00
7/21/2019	GOOGLE DOMAINS, GOOGLE, INC 1600 AMPITHEATRE PARKWAY MOUNTAIN VIEW, CA, 94043	Monthly hosting fee	WEB	\$6.00
7/29/2019	Irving 262 Western Ave Augusta, ME, 04330	Gas for campaign meeting	TRV	\$63.69
7/29/2019	Profeeno's Restaurant 934 MAIN ST WESTBROOK, ME, 04092	Food for campaign meeting	FOD	\$10.28