



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: April 27, 2024
Re: Registration and Initial Campaign Finance Report – Reclaim Maine PAC

This enforcement matter concerns a PAC registration and initial campaign finance report that potentially should be considered eight months late. The PAC registered in support of Robert “Bobby” Charles, who is a candidate for Governor in the 2026 elections. To avoid any confusion, please note that the PAC is acting independently of Mr. Charles, to the best of the Commission staff’s knowledge. *So, the potential late-filing violations discussed in this memo should not be attributed to Mr. Charles or his campaign committee.*

On March 11, 2026, Reclaim Maine filed a PAC registration with the Commission in support of Bobby Charles (attached as pages ETH 1-3; the Commission’s eFiling vendor is making improvements to this format). It filed its initial campaign finance report on March 19, 2026. ETH 4-11. The PAC has spent \$12,493 on digital ads in support of Mr. Charles and has organized a website advocating for his election, www.reclaim-maine.com.

The compliance problem for Reclaim Maine is that it started fundraising to influence the Maine gubernatorial election at least eight months earlier. On July 9, 2025, Reclaim Maine received a \$20,000 contribution from a donor that was explicitly solicited to support Bobby Charles’ election. The Commission staff therefore believes that Reclaim Maine should have registered as a PAC in July 2025 (if not earlier) and filed its initial campaign finance report with the Commission shortly thereafter.

The PAC has acknowledged receiving a notice of proposed penalties from the Commission staff but has not responded in writing. We’ve been advised the PAC’s officers may be replaced. The Commission staff have not confirmed whether the PAC intends to participate in the Commission’s May 6, 2026 meeting. Accordingly, the Commission may wish to take action on this matter at its May 6th meeting or postpone action until its May 27th meeting to provide the PAC with additional opportunity to respond.

LEGAL REQUIREMENTS (ETH 35-42)

PAC definition. In Maine Election Law, a PAC is defined as:

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

21-A M.R.S. § 1052(5)(A).

Definition of contribution. A contribution is defined, in pertinent part, as:

A. A gift, subscription, loan, advance or deposit of money or anything of value made to or received by a committee for the purpose of initiating or influencing a campaign, including but not limited to:

- (1) Funds that the contributor specified were given, in whole or in part, in connection with a campaign;
- (2) Funds provided in response to a solicitation that would lead the contributor to believe that the funds would be used specifically, in whole or in part, for the purpose of initiating or influencing a campaign; and
- (3) Funds that can reasonably be determined to have been provided by the contributor for the purpose of initiating or influencing a campaign when viewed in the context of the contribution and the recipient committee's activities regarding a campaign;

A-1. Any funds deposited or transferred into the campaign account described in section 1054

21-A M.R.S. § 1052(3).

General PAC registration requirement. A PAC must register with the Commission within seven days of receiving contributions or making expenditures totaling more than \$2,500 for purpose of influencing Maine state candidate elections. 21-A M.R.S. § 1052-A(1)(A).

Requirement for federal PACs to register with the Commission. “An organization that is registered as a political action committee ... with the Federal Election Commission ... shall register and file reports with the commission in accordance with this subchapter upon receiving contributions or making expenditures to initiate or influence a campaign in the State in excess of the [\$2,500] amounts that would require registration under section 1052-A.” 21-A M.R.S. § 1053-B.

Separate bank account. A PAC is required to “establish a separate account in a bank or other financial institution, referred to in this section as a ‘campaign account,’” deposit all funds “contributed to or received by the committee for the purpose of initiating or influencing a campaign” into the campaign account, and “finance all of the committee’s expenditures to initiate or influence the campaign through the campaign account.” 21-A M.R.S. § 1054(2).

Required contents of PAC campaign finance reports. Among other things, PACs must disclose in their campaign finance reports:

- “an itemization of each contribution of more than \$50 made to or received by the committee for the purpose of initiating or influencing a campaign”
- “[a]ny funds deposited into or transferred into the campaign account”
- “[a]n itemization of each expenditure made to initiate or influence any campaign,” and
- “[o]perational expenses and any other payments made from the campaign account”

21-A M.R.S. § 1060(4), (6)-(7).

Deadline for PAC to file an initial campaign finance report. A PAC must file an initial campaign finance report “within 7 days of registration or within 14 days of having been required to register, whichever comes first” 21-A M.R.S. § 1059 (first sentence).

Late-filing penalty for failing to file a PAC registration. A PAC that fails to register “may be assessed a fine” of up to \$2,500. 21-A M.R.S. § 1062-A(1). The statute directs the Commission to consider certain factors, such as “whether the violation was intentional, the amount of campaign and financial activity that occurred before the committee registered, whether the committee intended to conceal its campaign or financial activity and the level of experience of the committee's volunteers and staff.” *Id.*

Late-filing procedures for campaign finance reports. A PAC campaign finance report is not considered timely filed unless a properly submitted copy of the report is received by the Commission by the deadline that substantially conforms to the disclosure requirements applicable to PACs. 21-A M.R.S. § 1062-A(2). If a PAC files a report late, the Commission staff sends a notice of preliminary penalty to the PAC. § 1062-A(5). The Commission staff calculates the amount of the preliminary penalty based on the number of days the report is filed late multiplied by a percentage of the total contributions or expenditures in the report, whichever is greater. § 1062-A(3). The percentage for a first violation is 2%. The PAC has the option of asking the Commission for a determination of the penalty, usually referred to as a request for a waiver. § 1062-A(5). If the PAC does not ask for a waiver, the preliminary penalty calculated by staff becomes final and must be paid within 30 days to avoid referral to the Attorney General for collection. § 1062-A(6)&(9).

RECLAIM MAINE’S HISTORY AND 2025 FUNDRAISING

History. On August 30, 2024, Reclaim Maine registered as a PAC with the Federal Election Commission under its original name, We Decide. The PAC is not incorporated. Under the name We Decide, the PAC made more than \$400,000 in independent expenditures to influence 2024 federal candidate elections. On April 16, 2025, the PAC changed its name to Reclaim Maine by filing an amended Statement of Organization with the Federal Election Commission.

2025 fundraising to support Bobby Charles. On June 17 and June 30, 2025, an attorney and philanthropist from Augusta, Maine, Robert Fuller, made two contributions of \$25,000 to Reclaim Maine, for a total of \$50,000. ETH-18. Mr. Fuller also made the maximum contribution of \$2,075 directly to Bobby Charles’ campaign for Governor. Mr. Fuller died on February 14,

2026. These facts may suggest that Mr. Fuller contributed to Reclaim Maine for the purpose of promoting Bobby Charles for Governor, but in light of Mr. Fuller's passing there is no easy way to confirm that.

On July 9, 2025, Reclaim Maine received a contribution of \$20,000 from Stephen Ritzi, a Maine native who now lives in Florida. ETH-26. When called by the Ethics Commission staff, Mr. Ritzi confirmed a few facts about his contribution to Reclaim Maine. He explained he and Bobby Charles had been friends in school in Maine. Mr. Ritzi said he received a phone call from someone who said he was setting up a PAC to help out Bobby Charles. Mr. Ritzi received a text message with a link to a webpage for Reclaim Maine on the WinRed fundraising platform. He gave \$20,000 to Reclaim Maine through WinRed. A portion of the current WinRed webpage soliciting contributions to Reclaim Maine is at page ETH-12 for the Commission's reference. In campaign finance reports filed with the Federal Election Commission, Reclaim Maine reported the two \$25,000 contributions from Mr. Fuller and the \$20,000 from Mr. Ritzi.

2026 registration and campaign finance reporting in Maine. On March 6, 2026, Reclaim Maine transferred \$50,000 from its existing bank account to a new bank account Reclaim Maine had opened for its spending to influence the 2026 Maine elections. On March 11, 2026, Reclaim Maine registered as a PAC with the Commission. ETH 1-3. The PAC filed its initial campaign finance report on March 19, 2026. ETH 4-11. The only contribution in that initial campaign finance report was the March 6, 2026 transfer of \$50,000 from its old bank account to the new account set up for elections in Maine. ETH-5.

As noted above, the 2025 contributions from Mr. Fuller and Mr. Ritzi were reported by Reclaim Maine in campaign finance reports filed with the FEC. ETH 18, 26. Reclaim Maine has not reported the contributions from Mr. Fuller and Mr. Ritzi in campaign finance reports filed with the Commission, even though Mr. Ritzi's contribution, at least, was explicitly given to influence the 2026 Maine gubernatorial election. To discover the contributions from Mr. Fuller and Mr. Ritzi, members of the Maine public would need to figure out that Reclaim Maine is registered as a PAC with the FEC and review its 2025 FEC campaign finance reports, which is not conducive to disclosure.

Notice to Reclaim Maine of proposed penalties. On April 10, 2026, the Commission staff emailed a notice of proposed penalties to Reclaim Maine's treasurer and principal officer. ETH 28-29. We also mailed the notice to the PAC's address, which is a private mailbox at a shipping

and receiving store in Auburn, Maine. On April 21, 2026, the PAC treasurer emailed the Commission to acknowledge receiving the notice of proposed penalties. The email is in the attached materials at ETH 30-31. A little later, she sent another email stating that she and the principal officer would be replaced, and she was no longer authorized to speak to the Commission on behalf of the PAC.

STAFF ANALYSIS

Reclaim Maine has

- reported contribution(s) it received to influence Maine’s 2026 gubernatorial election to the Federal Election Commission, but
- reported its expenditures to influence that same election to the Ethics Commission.

The PAC may take the position that this arrangement is legal, but the Commission staff would submit it doesn’t comply with Maine Election Law and does not help the Maine public’s understanding of the sources of the PAC’s campaign funds.

An organization that qualifies as a PAC is required to open a separate bank account, deposit all contributions received for the purpose of influencing Maine elections in that account, and finance all expenditures to influence Maine elections from that account. 21-A M.R.S. § 1054(2). In other words, all of the Reclaim Maine’s Maine-related financial activity (both contributions received and expenditures made) should flow through that one account. Moreover, the PAC should report all of those Maine-related transactions in campaign finance reports to the Commission, so that the transactions are accessible to Maine people. 21-A M.R.S. § 1060(4), (6)-(7).

The Commission staff recommends concluding that Mr. Ritzi’s donation of \$20,000 was a contribution as defined in 21-A M.R.S. § 1052(3)(A) because:

- the donation was a gift of money to Reclaim Maine for the purpose of influencing a Maine state campaign, and
- in particular, the telephone solicitation “to help Bobby” and the WinRed webpage would reasonably have led Mr. Ritzi to believe that the contribution would specially influence a Maine campaign.

Because on July 9, 2025 Reclaim Maine had received contributions greater than \$2,500 for the purpose of influencing a Maine campaign, it qualified as a PAC as of that date, if not earlier.

21-A M.R.S. § 1052(5)(A).

Staff recommend concluding that Reclaim Maine should have registered with the Commission as a PAC within seven days of the July 9, 2025 contribution (*i.e.*, by July 16, 2025).

21-A M.R.S. § 1052-A(1)(A). In addition, Maine law specifically directs a federal PAC to register as a PAC with the Commission upon receiving contributions or making expenditures greater than \$2,500:

An organization that is registered as a political action committee ... with the Federal Election Commission ... shall register and file reports with the commission in accordance with this subchapter upon receiving contributions or making expenditures to initiate or influence a campaign in the State in excess of the amounts that would require registration under section 1052-A.

21-A M.R.S. § 1053-B. Once Reclaim Maine registered as a PAC with the Commission, it was required to file an initial campaign finance report within seven days (*i.e.*, by July 23, 2025). 21-A M.R.S. § 1059 (first sentence). It should also have filed two quarterly campaign finance reports with the Commission on October 5, 2025 and January 15, 2026. 21-A M.R.S. § 1059(2)(A).

Potential Penalties

Late PAC registration. Under 21-A M.R.S. § 1062-A(1), if a PAC fails to register with the Commission, a fine of up to \$2,500 may be assessed. In this matter, if the Commission concludes Reclaim Maine should have registered as a PAC by July 16, 2025, it may assess a penalty of up to \$2,500 taking into consideration whether the violation was intentional, the amount of campaign and financial activity that occurred before the committee registered, whether the committee intended to conceal its campaign or financial activity and the level of experience of the committee's volunteers and staff. 21-A M.R.S. § 1062-A(1).

Late initial campaign finance report. When a PAC files a campaign finance report late, the Commission is directed to follow enforcement procedures in 21-A M.R.S. § 1062-A. A campaign finance report is not considered timely filed unless the Commission receives a properly submitted copy of the report that substantially conforms to the disclosure requirements applicable to PACs. § 1062-A(2).

When a PAC files a report late, the Commission staff sends a notice of preliminary penalty to the PAC. § 1062-A(5). The staff calculates the preliminary penalty based on the

number of days the report was filed late multiplied by a percentage of the contributions or expenditures in the late report, whichever is greater. § 1062-A(3). The percentage for a first violation is 2%. *Id.* The maximum penalty for a late report is \$10,000 unless more than \$50,000 was reported late. § 1062-A(4). The PAC has a 14-day period within which it may request a determination of the penalty, which is often referred to as requesting a waiver from the Commission. § 1062-A(5). Alternatively, the PAC may pay the preliminary penalty. If the PAC does not request a waiver or pay the penalty, the preliminary penalty becomes final. § 1062-A(6). The PAC has 30 days to pay the final penalty or the unpaid penalty is forwarded to the Attorney General for collection. § 1062-A(9).

Commission staff recommend viewing Reclaim Maine’s initial campaign finance report as late, because it was not filed by July 16, 2025 and because it failed to substantially comply with disclosure requirements in that it did not include Mr. Ritzi’s contribution of \$20,000. For purposes of this enforcement action, the Commission staff recommend viewing the initial campaign finance report as 239 days late, because that is the length of time between the deadline of July 16, 2025 and the day the PAC filed its initial campaign finance report, March 19, 2026. The calculated preliminary penalty is the \$10,000 maximum, calculated as follows:

Report Name	Activity Amount	Due Date	Days Late	Penalty Rate	Penalty
Initial Report	\$20,000	7/23/2025	239	2%	\$95,600, reduced to the maximum of \$10,000

Rationale for Assessment of Penalties

The Commission staff recommend findings of violation and penalties for:

- not registering as a PAC with the Commission by July 16, 2025, and
- not filing its initial campaign finance report by July 23, 2025

in order to reinforce that PAC disclosure deadlines in Maine matter. We believe that most people active in Maine political campaigns understand if they are soliciting five-digit monetary contributions to influence a Maine candidate election, they may need to register as a PAC with the State of Maine or, at least, check with the election authorities about disclosure requirements. Reclaim Maine’s treasurer is an attorney and its principal officer works for a campaign finance compliance firm (www.rightsidecompliance.com). These PAC officers should have checked on

state disclosure requirements in the summer of 2025 once the PAC set up its WinRed webpage and successfully began fundraising to support Bobby Charles for Governor.

Had the PAC been collecting money in 2025 for some general political purpose without reference to any Maine election, it might have been legal to wait until Spring 2026 to register with the Commission. But, since Reclaim Maine began successfully soliciting contributions on or before July 9, 2025 to support Bobby Charles for Governor, it should have registered as a PAC in Maine after receiving Mr. Ritzi's contribution of \$20,000 (if not earlier).

The Commission staff recommend assessing penalties for the late registration and initial campaign finance report that are commensurate with the following facts:

- the PAC was at least 239 days late in registering,
- received \$20,000 (and potentially as much as \$70,000) in contributions to influence Maine elections without registering,
- the PAC has officers that understand campaign finance compliance and were fully able in the summer of 2025 to study Maine's disclosure requirements and contact the Ethics Commission for advice, and
- independent expenditure PACs predictably will be spending money to influence the upcoming primary and general elections for Governor. The Commission should assess slightly higher penalties in this matter to avoid a result where Commission penalties are viewed as ineffective at promoting compliance.

Staff Recommendation

As noted earlier, as of the date of this memo, the Commission has not received any written response to our April 10, 2026 notice of proposed penalties. We are told the PAC's officers may be replaced. If the Commission is ready to take action on this matter at its May 6, 2026 meeting, based on information currently available, the Commission staff recommends the following findings of violation and penalties. Alternatively, the Commission could postpone this matter until its May 27th meeting to provide the PAC with additional time to respond.

Late PAC registration

- *finding that Reclaim Maine violated 21-A M.R.S. §§ 1052-A(1)(A) & 1053-B by not registering as a PAC by July 16, 2026, and*

- *assessing a penalty* of \$1,500 pursuant to 21-A M.R.S. § 1062-A(1) (the maximum penalty is \$2,500).

Late initial campaign finance report

- *finding that Reclaim Maine violated* 21-A M.R.S. § 1059 (first sentence) by failing to file a substantially conforming initial campaign finance report with the Commission by July 23, 2026, and
- *assessing a penalty* of \$2,000 pursuant to 21-A M.R.S. § 1062-A(2) (*i.e.*, the Commission would be waiving all but \$2,000 of the preliminary penalty of \$10,000).

Attached Materials	
PAC Registration	ETH 1-3
Initial PAC Campaign Finance Report	ETH 4-11
Portion of Reclaim Maine Webpage on WinRed (4/10/2026)	ETH-12
Reclaim Maine’s Campaign Finance Reports to the FEC	ETH 13-27
Notice of Proposed Penalties	ETH 28-29
PAC’s Acknowledgement of Receipt of Penalty Notice	ETH 30-31
Commission Penalty Decisions – Political Committees	ETH 32-34
Relevant Statutes	ETH 35-42



Home ▼

RECLAIM MAINE

View registration details and information

Name	RECLAIM MAINE
Registration Type	Political Action Committee Registration
Status	Approved
Submitted At	March 11, 2026 17:33

Committee Information

Name	RECLAIM MAINE
Committee Type	Traditional
Street Address 1	9 NORTH RIVER RD
Street Address 2	#405
City	AUBURN
State	ME
ZIP Code	04210
Phone Number	(202) 615-2353
Email Address	SOLEARY@RIGHTSIDECOMPLIANCE.COM
Alternate Email	SO@SHANNONOLEARY.LAW

Website	https://www.reclaim-maine.com/
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Organization Type	Other
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Organization Type Other	SEC 527 POLITICAL ORG
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Date of Origin or Incorporation	2026-03-10
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Founding Organization

—Not Provided—

Officer

Principal Officer

First Name	ASHLIN
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Last Name	OBRIEN
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Phone Number	(512) 221-0097
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Email Address	ASHLIN@RIGHTSIDECOMPLIANCE.COM
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Legislator or Candidate	No
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Treasurer

First Name	SHANNON
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Last Name	OLEARY
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Phone Number	(202) 615-2353
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Email Address	SOLEARY@RIGHTSIDECOMPLIANCE.COM
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Legislator or Candidate	No
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Authorized Agents

—Not Provided—

Decision Maker

First Name	SHANNON
Last Name	OLEARY
Email Address	SOLEARY@RIGHTSIDECOMPLIANCE.COM

Position Statements

Position 1

Candidates	BOBBY CHARLES
Position	Support

Contact the Maine Ethics Commission

Maine Ethics Commission
135 State House Station
Augusta, ME 04333-0135

ethics@maine.gov
www.maine.gov/ethics
(207) 287-4179

Hours:
Monday - Friday
8:00 AM - 5:00 PM

Campaign Finance Software by [MapLight](#)



Commission on Governmental Ethics and Election Practices
 Mail: 135 State House Station, Augusta, Maine 04333
 Office: 45 Memorial Circle, Augusta, Maine

Initial Campaign Finance Report – Political Action Committees and Ballot Question Committees

COMMITTEE		TREASURER	
Name, mailing address, phone number, e-mail		Name, mailing address, phone number, e-mail	
RECLAIM MAINE		SHANNON OLEARY	
9 NORTH RIVER ROAD #405		9 NORTH RIVER ROAD #405	
AUBURN, ME 04210		AUBURN, ME 04210	
so@shannonoleary.law		so@shannonoleary.law	
REPORT	DUE DATE	REPORTING PERIOD	
Initial Campaign Finance	03/19/2026	01/01/2026 – 03/12/2026	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	50,000.00	50,000.00
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)	50,000.00	50,000.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	12,493.88	12,493.88
6. OPERATING EXPENDITURES (SCHEDULE B-1)	25.00	25.00
7. LOAN REPAYMENTS (SCHEDULE C)	0.00	0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	12,518.88	12,518.88
OTHER ACTIVITY		
9. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	0.00	0.00
10. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	0.00	
11. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	0.00	

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

**SCHEDULE A
CASH CONTRIBUTIONS**

- 1 = Individual
- 2 = Candidate/ Spouse/ Domestic Partner
- 3 = Commercial Source
- 4 = Nonprofit Organization
- 5 = Political Action Committee
- 6 = Political Party Committee
- 7 = Ballot Question Committee
- 8 = Other Candidate/ Candidate Committee

- 9 = Candidate / Candidate Committee
- 10 = General Treasury Transfer
- 11 = Transfer from Previous Campaign
- 12 = Contributors giving \$50 or less
- 13 = Contributors giving \$100 or less
- 14 = Contributors giving \$200 or less
- 15 = MCEA Payment
- 16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
3/6/2026	Reclaim Maine Federal PAC (FEC ID C00887851) 7415 SW PKWY BLDG 6 STE 500 AUSTIN, TX 78735	N/A	5	50,000.00
TOTAL CASH CONTRIBUTIONS				50,000.00

**SCHEDULE A - 1
IN-KIND CONTRIBUTIONS**

- 1 = Individual
- 2 = Candidate/ Spouse/ Domestic Partner
- 3 = Commercial Source
- 4 = Nonprofit Organization
- 5 = Political Action Committee
- 6 = Political Party Committee
- 7 = Ballot Question Committee
- 8 = Other Candidate/ Candidate Committee

- 9 = Candidate / Candidate Committee
- 10 = General Treasury Transfer
- 11 = Transfer from Previous Campaign
- 12 = Contributors giving \$50 or less
- 13 = Contributors giving \$100 or less
- 14 = Contributors giving \$200 or less
- 15 = MCEA Payment
- 16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	EMPLOYER AND OCCUPATION	DESCRIPTION (of goods, services, facilities, or discounts received)	TYPE	AMOUNT
N/A					
TOTAL IN-KIND CONTRIBUTIONS					

SCHEDULE B
EXPENDITURES TO SUPPORT OR OPPOSE
(Report Operating Expenditures on Schedule B-1)

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 – Please specify whether expenditure supported or opposed a candidate and include candidate’s name	TYPE	AMOUNT
3/6/2026	Lariat Strategies LLC 5702 Portal Dr Houston, TX 77096-6011	DIGITAL ADS IN SUPPORT OF BOBBY CHARLES	ONL	12,493.88
TOTAL EXPENDITURES TO SUPPORT OR OPPOSE:				12,493.88

**SCHEDULE B-1
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
APP	Apparel (t-shirts, hats, embroidery, etc.)	CON	Contribution to party committee, non-profit, other candidate, etc.	
EQP	Equipment of \$50 or more (computer, tablet, phone, furniture, etc.)	EVT	Campaign and fundraising events (venue or booth rental, entertainment, supplies, etc.)	
FOD	Food for campaign events or volunteers, catering	HRD	Hardware and small tools (hammer, nails, lumber, paint, etc.)	
LIT	Printed campaign materials (palmcards, signs, stickers, flyers, etc.)	MHS	Mail house and direct mail (design, printing, mailing, and postage all included)	
NEW	Newspaper and print media ads only	OFF	Office supplies, rent, utilities, internet service, phone minutes and data	
ONL	Social media and online advertising only	OTH	Other and fees (bank, contribution, and money order fees, etc.)	
PER	Personnel and campaign staff, consulting, and independent contractor costs	PHO	Phones (phone banking, robocalls and texts)	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Professional services (graphic design, legal services, web design, etc.)	RAD	Radio ads, production costs	
TKT	Entrance cost to event (bean suppers, fairs, party events, etc.)	TRV	Travel (fuel, mileage, lodging, etc.)	
TVN	TV/cable ads, production, and media buyer costs only	WEB	Website and internet costs (website domain and registration, etc.)	
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
3/7/2026	CHAIN BRIDGE BANK NA Chain Bridge Bank 1445A Laughlin Ave McLean, VA 22101	BANK FEE	OTH	25.00

TOTAL OPERATING EXPENDITURES				25.00

**SCHEDULE C
LOANS/LOAN PAYMENTS**

LOAN ACTIVITY FOR THIS COMMITTEE						
Lender	Type of Lender	Original Loan Date	Original Loan Amount	Total Payment Amount	Total Forgiveness Amount	Loan Balance
N/A						
TOTAL LOAN BALANCE AT END OF REPORTING PERIOD						

**SCHEDULE D
UNPAID DEBTS AND OBLIGATIONS**

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

DATE OF OBLIGATION	CREDITOR	DESCRIPTION	AMOUNT
N/A			
TOTAL UNPAID DEBTS AND OBLIGATIONS			



**RECLAIM
MAINE**

Bobby Charles is the
Maine Man we need to
lead as our next
Governor!

Donate TODAY!

\$25 \$50 \$100 \$250



FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

RECLAIM MAINE

ADDRESS (number and street) PO BOX 341027
 Check if different than previously reported. (ACC) AUSTIN TX 78734

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00887851 3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

- (b) Monthly Report Due On:
- | | | | |
|--------------------------------------|--------------------------------------|---------------------------------------|----------------------------------------------------------------|
| <input type="checkbox"/> Feb 20 (M2) | <input type="checkbox"/> May 20 (M5) | <input type="checkbox"/> Aug 20 (M8) | <input type="checkbox"/> Nov 20 (M11) (Non-Election Year Only) |
| <input type="checkbox"/> Mar 20 (M3) | <input type="checkbox"/> Jun 20 (M6) | <input type="checkbox"/> Sep 20 (M9) | <input type="checkbox"/> Dec 20 (M12) (Non-Election Year Only) |
| <input type="checkbox"/> Apr 20 (M4) | <input type="checkbox"/> Jul 20 (M7) | <input type="checkbox"/> Oct 20 (M10) | <input type="checkbox"/> Jan 31 (YE) |

- (c) 12-Day PRE-Election Report for the:
- | | | |
|-------------------------------------------|----------------------------------------|---------------------------------------|
| <input type="checkbox"/> Primary (12P) | <input type="checkbox"/> General (12G) | <input type="checkbox"/> Runoff (12R) |
| <input type="checkbox"/> Convention (12C) | <input type="checkbox"/> Special (12S) | |
- Election on M M / D D / Y Y Y Y Y Y in the State of

- (d) 30-Day POST-Election Report for the:
- | | | |
|----------------------------------------|---------------------------------------|----------------------------------------|
| <input type="checkbox"/> General (30G) | <input type="checkbox"/> Runoff (30R) | <input type="checkbox"/> Special (30S) |
|----------------------------------------|---------------------------------------|----------------------------------------|
- Election on M M / D D / Y Y Y Y Y Y in the State of

5. Covering Period M M / D D / Y Y Y Y Y Y 01 / 01 / 2025 through M M / D D / Y Y Y Y Y Y 06 / 30 / 2025

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer HOBBS, CABELL, , ,

Signature of Treasurer HOBBS, CABELL, , , Date M M / D D / Y Y Y Y Y Y 07 / 31 / 2025

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office Use Only									
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**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

Write or Type Committee Name

RECLAIM MAINE

Report Covering the Period: From: / / To: / /

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <input type="text" value="2025"/>		<input type="text" value="18931.00"/>
(b) Cash on Hand at Beginning of Reporting Period.....	<input type="text" value="18931.00"/>	
(c) Total Receipts (from Line 19)	<input type="text" value="50000.94"/>	<input type="text" value="50000.94"/>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	<input type="text" value="68931.94"/>	<input type="text" value="68931.94"/>
7. Total Disbursements (from Line 31).....	<input type="text" value="16351.05"/>	<input type="text" value="16351.05"/>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	<input type="text" value="52580.89"/>	<input type="text" value="52580.89"/>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	<input type="text" value="0.00"/>	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	<input type="text" value="0.00"/>	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

DETAILED SUMMARY PAGE
of Receipts

Write or Type Committee Name

RECLAIM MAINE

Report Covering the Period: From: 01 / 01 / 2025 To: 06 / 30 / 2025

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	50000.00	50000.00
(ii) Unitemized	0.94	0.94
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	50000.94	50000.94
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)	50000.94	50000.94
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	50000.94	50000.94
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	50000.94	50000.94

DETAILED SUMMARY PAGE
of Disbursements

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures	16351.05	16351.05
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	16351.05	16351.05
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditures (use Schedule E)	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations).....	0.00	0.00
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	16351.05	16351.05
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	16351.05	16351.05

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	50000.94	50000.94
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	50000.94	50000.94
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	16351.05	16351.05
37. Offsets to Operating Expenditures (from Line 15, page 3).....	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	16351.05	16351.05

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: PAGE 6 OF 8
 (check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
RECLAIM MAINE

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name
A. Fuller Jr, Robert, , ,

Mailing Address 10800 Potomac Tennis Ln

City Potomac	State MD	Zip Code 20854
-----------------	-------------	-------------------

FEC ID number of contributing federal political committee. **C**

Name of Employer (for Individual) Retired	Occupation (for Individual) Retired
----------------------------------------------	----------------------------------------

Receipt For:
 Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼
25000.00

Date of Receipt
 M M / D D / Y Y Y Y Y
 06 / 17 / 2025

Transaction ID : SA11AI.4222

Amount of Each Receipt this Period
 25000.00

Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name
B. Fuller Jr, Robert, , ,

Mailing Address 10800 Potomac Tennis Ln

City Potomac	State MD	Zip Code 20854
-----------------	-------------	-------------------

FEC ID number of contributing federal political committee. **C**

Name of Employer (for Individual) Retired	Occupation (for Individual) Retired
----------------------------------------------	----------------------------------------

Receipt For:
 Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼
50000.00

Date of Receipt
 M M / D D / Y Y Y Y Y
 06 / 30 / 2025

Transaction ID : SA11AI.4223

Amount of Each Receipt this Period
 25000.00

Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name
C.

Mailing Address

City	State	Zip Code
------	-------	----------

FEC ID number of contributing federal political committee. **C**

Name of Employer (for Individual)	Occupation (for Individual)
-----------------------------------	-----------------------------

Receipt For:
 Primary General
 Other (specify)

Aggregate Year-to-Date ▼

Date of Receipt
 M M / D D / Y Y Y Y Y

Amount of Each Receipt this Period

Memo Item

SUBTOTAL of Receipts This Page (optional).....	50000.00
TOTAL This Period (last page this line number only).....	50000.00

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 26	<input type="checkbox"/> 27
<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
RECLAIM MAINE

A. RightSide Compliance

Full Name (Last, First, Middle Initial)

Mailing Address PO Box 341027

City Austin State TX Zip Code 78734

Purpose of Disbursement
Compliance and Treasury Management Consulting

Candidate Name

Office Sought: House Senate President
State: District:

Disbursement For: Primary General Other (specify) ▼

Date of Disbursement: MM / DD / YYYY
03 / 10 / 2025

FEC Identification Number: C

Transaction ID : **SB21B.4218**

Amount of Each Disbursement this Period: 7800.00

Memo Item

B. RightSide Compliance

Full Name (Last, First, Middle Initial)

Mailing Address PO Box 341027

City Austin State TX Zip Code 78734

Purpose of Disbursement
Compliance and Treasury Management Consulting

Candidate Name

Office Sought: House Senate President
State: District:

Disbursement For: Primary General Other (specify) ▼

Date of Disbursement: MM / DD / YYYY
03 / 10 / 2025

FEC Identification Number: C

Transaction ID : **SB21B.4224**

Amount of Each Disbursement this Period: 848.05

Memo Item

C. The Gober Group

Full Name (Last, First, Middle Initial)

Mailing Address PO Box 341016

City Austin State TX Zip Code 78734

Purpose of Disbursement
Legal Services

Candidate Name

Office Sought: House Senate President
State: District:

Disbursement For: Primary General Other (specify) ▼

Date of Disbursement: MM / DD / YYYY
03 / 10 / 2025

FEC Identification Number: C

Transaction ID : **SB21B.4217**

Amount of Each Disbursement this Period: 7691.00

Memo Item

SUBTOTAL of Disbursements This Page (optional).....▶	16339.05
TOTAL This Period (last page this line number only).....▶	16339.05

SCHEDULE D (FEC Form 3X)

DEBTS AND OBLIGATIONS

Excluding Loans

(Use separate schedule(s) for each numbered line)	PAGE 8 OF 8
	FOR LINE NUMBER: (check only one)
<input type="checkbox"/> 9	<input checked="" type="checkbox"/> 10

NAME OF COMMITTEE (In Full)
RECLAIM MAINE

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor RightSide Compliance			Nature of Debt (Purpose): Compliance and Treasury Management Consulting
Mailing Address PO Box 341027			
City Austin	State TX	Zip Code 78734	

Outstanding Balance Beginning This Period <input type="text" value="7800.00"/>	Transaction ID : SD10.4213	
Amount Incurred This Period <input type="text" value="0.00"/>	Payment This Period <input type="text" value="7800.00"/>	Outstanding Balance at Close of This Period <input type="text" value="0.00"/>

B. Full Name (Last, First, Middle Initial) of Debtor or Creditor The Gober Group			Nature of Debt (Purpose): Legal Services
Mailing Address PO Box 341016			
City Austin	State TX	Zip Code 78734	

Outstanding Balance Beginning This Period <input type="text" value="7691.00"/>	Transaction ID : SD10.4214	
Amount Incurred This Period <input type="text" value="0.00"/>	Payment This Period <input type="text" value="7691.00"/>	Outstanding Balance at Close of This Period <input type="text" value="0.00"/>

C. Full Name (Last, First, Middle Initial) of Debtor or Creditor			Nature of Debt (Purpose):
Mailing Address			
City	State	Zip Code	

Outstanding Balance Beginning This Period <input type="text"/>		
Amount Incurred This Period <input type="text"/>	Payment This Period <input type="text"/>	Outstanding Balance at Close of This Period <input type="text"/>

1) SUBTOTALS This Period This Page (optional)..... ▶	<input type="text" value="0.00"/>
2) TOTALS This Period (last page this line number only)..... ▶	<input type="text" value="0.00"/>
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) ▶	<input type="text"/>
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) ▶	<input type="text"/>

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

RECLAIM MAINE

ADDRESS (number and street) 7415 SW PKWY BLDG 6 STE 500

Check if different than previously reported. (ACC) #134
AUSTIN TX 78735

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00887851

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

- (b) Monthly Report Due On:
- | | | | |
|--------------------------------------|--------------------------------------|---------------------------------------|----------------------------------------------------------------|
| <input type="checkbox"/> Feb 20 (M2) | <input type="checkbox"/> May 20 (M5) | <input type="checkbox"/> Aug 20 (M8) | <input type="checkbox"/> Nov 20 (M11) (Non-Election Year Only) |
| <input type="checkbox"/> Mar 20 (M3) | <input type="checkbox"/> Jun 20 (M6) | <input type="checkbox"/> Sep 20 (M9) | <input type="checkbox"/> Dec 20 (M12) (Non-Election Year Only) |
| <input type="checkbox"/> Apr 20 (M4) | <input type="checkbox"/> Jul 20 (M7) | <input type="checkbox"/> Oct 20 (M10) | <input type="checkbox"/> Jan 31 (YE) |

- (c) 12-Day PRE-Election Report for the:
- | | | |
|-------------------------------------------|----------------------------------------|---------------------------------------|
| <input type="checkbox"/> Primary (12P) | <input type="checkbox"/> General (12G) | <input type="checkbox"/> Runoff (12R) |
| <input type="checkbox"/> Convention (12C) | <input type="checkbox"/> Special (12S) | |

Election on M M / D D / Y Y Y Y Y Y in the State of

- (d) 30-Day POST-Election Report for the:
- | | | |
|----------------------------------------|---------------------------------------|----------------------------------------|
| <input type="checkbox"/> General (30G) | <input type="checkbox"/> Runoff (30R) | <input type="checkbox"/> Special (30S) |
|----------------------------------------|---------------------------------------|----------------------------------------|

Election on M M / D D / Y Y Y Y Y Y in the State of

5. Covering Period M M / D D / Y Y Y Y Y Y 07 / 01 / 2025 through M M / D D / Y Y Y Y Y Y 12 / 31 / 2025

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer HOBBS, CABELL, , ,

Signature of Treasurer HOBBS, CABELL, , , Date M M / D D / Y Y Y Y Y Y 01 / 25 / 2026

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office Use Only									
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SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016)

Write or Type Committee Name

RECLAIM MAINE

Report Covering the Period: From: / / To: / /

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <input type="text" value="2025"/>		<input type="text" value="18931.00"/>
(b) Cash on Hand at Beginning of Reporting Period.....	<input type="text" value="52580.89"/>	
(c) Total Receipts (from Line 19)	<input type="text" value="20000.00"/>	<input type="text" value="70000.94"/>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	<input type="text" value="72580.89"/>	<input type="text" value="88931.94"/>
7. Total Disbursements (from Line 31).....	<input type="text" value="2525.00"/>	<input type="text" value="18876.05"/>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	<input type="text" value="70055.89"/>	<input type="text" value="70055.89"/>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	<input type="text" value="0.00"/>	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	<input type="text" value="0.00"/>	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

DETAILED SUMMARY PAGE
of Receipts

Write or Type Committee Name

RECLAIM MAINE

Report Covering the Period: From: / / To: / /

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	20000.00	70000.00
(ii) Unitemized	0.00	0.94
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	20000.00	70000.94
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)	20000.00	70000.94
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	20000.00	70000.94
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	20000.00	70000.94

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures	2525.00	18876.05
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	2525.00	18876.05
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditures (use Schedule E)	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations).....	0.00	0.00
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	2525.00	18876.05
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	2525.00	18876.05

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	20000.00	70000.94
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	20000.00	70000.94
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	2525.00	18876.05
37. Offsets to Operating Expenditures (from Line 15, page 3).....	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	2525.00	18876.05

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 6 OF 7
	<input checked="" type="checkbox"/> 11a <input type="checkbox"/> 11b <input type="checkbox"/> 11c <input type="checkbox"/> 12 <input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input type="checkbox"/> 17	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
RECLAIM MAINE

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. RITZI, STEPHEN, , ,			Date of Receipt M M / D D / Y Y Y Y Y Y 07 / 09 / 2025		
Mailing Address 777 N ASHLEY DR UNITE 3101			Transaction ID : SA11AI.4235		
City TAMPA	State FL	Zip Code 33602	Amount of Each Receipt this Period 20000.00		
FEC ID number of contributing federal political committee. C			<input type="checkbox"/> Memo Item		
Name of Employer (for Individual) PERGRAVIS LLC		Occupation (for Individual) CONSULTANT			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 20000.00			

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B.			Date of Receipt M M / D D / Y Y Y Y Y Y		
Mailing Address					
City	State	Zip Code	Amount of Each Receipt this Period		
FEC ID number of contributing federal political committee. C			<input type="checkbox"/> Memo Item		
Name of Employer (for Individual)		Occupation (for Individual)			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼			

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C.			Date of Receipt M M / D D / Y Y Y Y Y Y		
Mailing Address					
City	State	Zip Code	Amount of Each Receipt this Period		
FEC ID number of contributing federal political committee. C			<input type="checkbox"/> Memo Item		
Name of Employer (for Individual)		Occupation (for Individual)			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date ▼			

SUBTOTAL of Receipts This Page (optional).....▶	20000.00
TOTAL This Period (last page this line number only).....▶	20000.00

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 26	<input type="checkbox"/> 27
<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
RECLAIM MAINE

A. Cicconi, Matt, , ,

Full Name (Last, First, Middle Initial)

Date of Disbursement: MM / DD / YYYY
07 / 05 / 2025

Mailing Address: 148 New Towne Rd

City: Lynchburg State: VA Zip Code: 24502

Purpose of Disbursement: Web Services

Candidate Name: []

Category/Type: []

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

FEC Identification Number: C []

Transaction ID : SB21B.4226

Amount of Each Disbursement this Period: 2500.00

Memo Item

B.

Full Name (Last, First, Middle Initial)

Date of Disbursement: MM / DD / YYYY

Mailing Address

City State Zip Code

Purpose of Disbursement

Candidate Name

Category/Type

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

FEC Identification Number: C []

Amount of Each Disbursement this Period

Memo Item

C.

Full Name (Last, First, Middle Initial)

Date of Disbursement: MM / DD / YYYY

Mailing Address

City State Zip Code

Purpose of Disbursement

Candidate Name

Category/Type

Office Sought: House Senate President
Disbursement For: Primary General Other (specify) ▼

State: District:

FEC Identification Number: C []

Amount of Each Disbursement this Period

Memo Item

SUBTOTAL of Disbursements This Page (optional).....▶	2500.00
TOTAL This Period (last page this line number only).....▶	2500.00



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

April 10, 2025

By Email and Regular Mail

Shannon O'Leary, Esq./Reclaim Maine
9 North River Road, #405
Auburn, ME 04210

Dear Shannon,

This letter is to advise that the staff of the Maine Ethics Commission is scheduling an item relating to Reclaim Maine ("the PAC") on the agenda of the next meeting of the Ethics Commission on May 6, 2026. The Commission staff will recommend that the members of the Commission find that Reclaim Maine was late complying with Maine's campaign finance registration and reporting deadlines. This letter is to explain the rationale for the recommended actions and to provide Reclaim Maine with an opportunity to respond.

Key Facts

- Reclaim Maine is a political action committee that is registered with the Federal Election Commission (FEC). During the 2023-24 election cycle, when it operated under a different name, the PAC made independent expenditures to influence federal candidate elections. On April 16, 2025, the PAC changed its name to Reclaim Maine by filing an amended Statement of Organization with the FEC.
- In June 2025, the federal PAC received two contributions totaling \$50,000 from former Augusta attorney and philanthropist Robert Fuller.
- On July 9, 2025, the federal PAC received a contribution of \$20,000 from Stephen Ritzi, a Maine native who now lives in Florida.
- In two short conversations I had with Mr. Ritzi, he confirmed that an individual called him and said he was putting together a PAC to support Robert Charles for Governor and invited him to contribute through the political contribution processing website, WinRed. The webpage for Reclaim Maine on WinRed makes it very clear donations to Reclaim Maine will support Bobby Charles for Governor.
- You advised that once the Reclaim Maine decided to influence a state election in Maine, it registered and began filing campaign finance reports as a PAC with our office, and opened a separate bank account. Its registration was filed with us on March 11, 2026. It filed its initial campaign finance report on March 19, 2026.

OFFICE LOCATED AT: 45 MEMORIAL CIRCLE, AUGUSTA, MAINE
WEBSITE: WWW.MAINE.GOV/ETHICS

PHONE: (207) 287-4179

FAX: (207) 287-6179 **ETH-28**

Recommended Application of the Law

The Commission staff will recommend that the Commission conclude that Mr. Ritzi's contribution of \$20,000 was a contribution as defined in 21-A M.R.S. § 1052(3)(A) because it was a gift of money to Reclaim Maine to influence a Maine state campaign and the solicitation and WinRed webpage would reasonably have led Mr. Ritzi to believe that the contribution would specially influence a Maine campaign. Therefore, Reclaim Maine was a PAC as of July 9, 2025 because it had received contributions greater than \$2,500 for the purpose of influencing a Maine campaign. 21-A M.R.S. § 1052(5)(A)(5). It should have registered with the Commission within seven days under 21-A M.R.S. §§ 1052-A(1)(A) and 1053-B and filed an initial and quarterly campaign finance reports according to the schedule in 21-A M.R.S. § 1059.

The Commission staff intends to recommend finding that the PAC violated the above statutes and should be assessed penalties of:

- \$2,000 for filing a late registration pursuant to 21-A M.R.S. § 1062-A(1), and
- \$2,000 for filing the initial campaign finance report late.

Under our penalty statute, when a campaign finance report is filed late, the Commission staff calculates a preliminary penalty based on a formula in statute and the PAC may ask for a waiver. The preliminary penalty for the PAC's late initial campaign finance report is the maximum of \$10,000 under 21-A M.R.S. § 1062-A(4). Without the \$10,000 maximum, the preliminary penalty would be \$95,600, calculated as 2% of \$20,000 (the contributions in the report) multiplied by the number of days late, which is 239 (the number of days between 7/23/2025, the deadline for the initial report, and 3/19/2026, the date it was filed). 21-A M.R.S. § 1062-A(3). In other words, the preliminary penalty for the late report is \$10,000, but staff will recommend a waiver down to \$2,000. The total of the recommended penalties is \$4,000.

Opportunity to respond. The Commission will meet beginning at 9:00 a.m. on Wednesday, May 6, 2026 at the Commission office, 45 Memorial Circle in Augusta, Maine. You are strongly encouraged to participate in the meeting in person or by Zoom. If you would like to respond to the proposed findings of violation and penalties in writing, you are welcome to submit comments by Monday, April 27. I will distribute them to the members of the Commission who will be deciding this matter.

I will be out of the office on vacation through April 15 but am happy to answer any questions you have beginning on April 16th. Thank you.

Sincerely,



Jonathan Wayne
Executive Director

cc: Ashlin O'Brien, Principal Officer

From: [SHANNON OLEARY](#)
To: [Wayne, Jonathan](#)
Cc: ashlin@rightsidecompliance.com; [Currier, Martha](#); [Hoefler, Heidi](#)
Subject: RE: Maine Ethics Penalty Notice
Date: Tuesday, April 21, 2026 8:38:38 PM

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Jonathan~

I am confirming that the letter of April 10 re the Penalty Notice has been received.

We are working out the options and I will catch up with you on Wed or Thr.

Thanks,

Shannon

Shannon O'Leary Law
202-615-2353 | so@shannonoleary.law

From: Wayne, Jonathan <Jonathan.Wayne@maine.gov>
Sent: Tuesday, April 21, 2026 2:56 PM
To: SHANNON OLEARY <so@shannonoleary.law>
Cc: ashlin@rightsidecompliance.com; Currier, Martha <Martha.Currier@maine.gov>; Hoefler, Heidi <Heidi.Hoefler@maine.gov>
Subject: FW: Maine Ethics Penalty Notice

Shannon,

Could you please confirm if you received my letter of April 10, 2026, and if you anticipate submitting a response on behalf of the PAC in writing by April 27 or by participating in the Commission's May 6, 2026 meeting? Thank you very much.

Jonathan Wayne
Executive Director
Maine Ethics Commission
135 SHS
Augusta, ME 04333
207-287-4179

From: Wayne, Jonathan

Sent: Friday, April 10, 2026 2:51 PM

To: so@shannonoleary.law

Cc: ashlin@rightsidecompliance.com; Currier, Martha <Martha.Currier@maine.gov>; Hoefler, Heidi <Heidi.Hoefler@maine.gov>

Subject: Maine Ethics Penalty Notice

Shannon,

We appreciate the exchanges with you regarding Reclaim Maine. The Commission staff has decided to recommend findings and penalties as discussed in the attached letter when the Commission members next meet on May 6, 2026. The PAC's opportunity to respond is set out at the end of the letter.

With regard to any future IEs by Reclaim Maine, if they are funded with the money transferred from the federal PAC, we advise that Robert Fuller and Steve Ritzi be considered among the top funders for the IE communications. This is pursuant to Ch. 1, section 7(10)(C)&(D) of the [Commission's rules](#). If you have more questions about how to apply the top three funder requirements, please consult with Heidi Hoefler. Thank you.

Jonathan Wayne
Executive Director
Maine Ethics Commission
135 SHS
Augusta, ME 04333
207-287-4179

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

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

We the People PAC	Late 11 day Pre-special election report	\$1,147.50	\$400.00	8/23/2023
Star City PAC	Late 11 day Pre-special election report	\$370.50	\$150.00	8/23/2023
Citizens for a Bright Future	Late Registration, late filing	\$3,866.00	\$250.00	5/29/2024
Citizens for a Bright Future	Missing Disclaimers on signs		\$50.00	5/29/2024
Planned Parenthood Maine Action Fund	Late IE Report	\$733.60	\$400.00	5/29/2024
Bangor Fire Fighters PAC Fund	Late to update their registration	\$250.00	\$0.00	5/29/2024
Maine Republican Party	2 Late 24-Hour Reports	\$38,839.80	\$3,000.00	9/25/2024
Friends of Maine Hospitals PAC	Late 24-Hour Report	\$900.00	\$500.00	9/25/2024
Local 349 PAC Fund	Substantially non-compliant 42-Day Post-Primary Report	\$1,369.00	\$500.00	9/25/2024
Maine Labor Climate PAC	Late 60-Day Pre-General IE Report	\$534.44	\$400.00	9/25/2024
Bright Future Maine PAC	Late 2-Day Pre-Primary IE	\$6,411.30	\$375.00	9/25/2024
Democrats of Kennebunk, Kennebunkport and Ar	Late July Semi-Annual Report	\$500.00	\$100.00	10/30/2024
Bright Future Maine PAC	Late 24-Hour Report	\$2,800.00	\$1,000.00	12/18/2024
Cumberland County Republican Committee	Late IE Report	\$382.50	\$100.00	12/18/2024
FAM PAC	Late IE Report	\$365.40	\$365.40	12/18/2024
ActBlue Maine PAC	Late July Semi-Annual Report	\$683,731.00	\$100,000.00	9/24/2025
Protect ME – No Red Flag BQC	Late Registration	\$500.00	\$500.00	9/24/2025
Save Maine Absentee Voting	Late 24-Hour Report	\$10,000.00	\$500.00	1/28/2026
Late Major Contributor Decisions				
Committee Name	Violation	Preliminary Penalty	Final Penalty	Commission Meeting Date
Waiver requests				
Mainers for Local Power PAC	Late Major Contributor (2)	\$53,431.15	\$2,500.00	3/10/2020
Maine Street Solutions - Protect Schools BQC	Late Major Contributor	\$25,000.00	\$2,000.00	5/27/2020
Clean Energy Matters PAC	Late Major Contributor Notice	\$50,000.00	\$2,500.00	3/31/2021
We the People PAC	Late Major Contributor Notice	\$11,500.00	\$2,500.00	5/26/2021
Mainers for Local Power PAC	Late Major Contributor Notice	\$13,786.32	\$2,500.00	8/23/2021
Maine Energy Progress	Late Major Contributor Notice	\$25,768.87	\$3,000.00	11/29/2023
Dorman Products	Late Major Contributor Report	\$15,000.00	\$5,000.00	11/29/2023
Maine Automotive Right to Repair	Late Major Contributor Notices (6)	\$240,000.00	\$35,000.00	11/29/2023
Genuine Parts Company	Late Major Contributor Report	\$50,000.00	\$5,000.00	1/31/2024
Our Power	Two Late Major Contributor Notices	\$28,155.08	\$6,000.00	2/27/2024
Other Enforcement Decisions				
Committee Name	Violation	Preliminary Penalty	Final Penalty	Commission Meeting Date
Other Violations				
Sara Gideon Leadership PAC	Contributions Made in Name of Another		\$500.00	10/30/2019

Working Families PAC	Failure to file 2020 October Quarterly; 11-Day Pre-General, 42-Day Post-General, and 2021 January Quarterly and April Quarterly campaign finance reports		\$3,750.00	5/26/2021
Mainers for Fair Laws BQC	Missing Disclaimers in television ads		\$2,500.00	9/29/2021
Working Families PAC	Over the limit contribution to Diane Russell senate campaign		\$285.00	9/29/2021
American Leadership Committee-Maine PAC	Missing top three donors		\$10,000.00	11/30/2022
Building the Maine House	Late 11-day Pre-Primary Report		\$0.00	7/24/2024
Jake Ducharme	Missing Disclosures on Saviello signs		\$0.00	10/30/2024
Cape Says Yes to S	Missing Disclosure on advertisement		\$0.00	10/30/2024
Cape Elizabeth School Referendum	Missing Disclosure on advertisement		\$0.00	10/30/2024
Yes on 1/Freeport	Missing Disclosures on mailer		\$50.00	10/30/2024
Auburn Democratic City Committee	Missing Disclosure on advertisement		\$0.00	10/30/2024
Maine Senate Republican PAC	making an over-the-limit contribution		\$1,000.00	1/29/2025
Maine Senate Republican PAC	making a material false statement		\$0.00	1/29/2025
Senate Democratic Campaign Committee	inaccurate attribution & payment		\$159.50	1/29/2025
Aroostook County Democratic Committee	Missing address on disclosure message		\$0.00	9/24/2025
Aroostook County Democratic Committee	Missing paid for/authorized by message		\$0.00	9/24/2025

21-A M.R.S. § 1052. Definitions

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

1. Campaign. “Campaign” means any course of activities to influence the nomination or election of a candidate or to initiate or influence any of the following ballot measures:

- A.** A people’s veto referendum under the Constitution of Maine, Article IV, Part Third, Section 17;
- B.** A direct initiative of legislation under the Constitution of Maine, Article IV, Part Third, Section 18;
- C.** An amendment to the Constitution of Maine under Article X, Section 4;
- D.** A referendum vote on a measure enacted by the Legislature and expressly conditioned upon ratification by a referendum vote under the Constitution of Maine, Article IV, Part Third, Section 19;
- E.** The ratification of the issue of bonds by the State or any agency thereof; and
- F.** Any county or municipal referendum.

2. Committee. “Committee” means any political action committee or ballot question committee and includes any agent of a political action committee or ballot question committee.

2-A. Ballot question committee. “Ballot question committee” means a person that receives contributions or makes expenditures aggregating in excess of \$5,000 for the purpose of initiating or influencing a campaign, other than a campaign for the nomination or election of a candidate. The term “ballot question committee” does not include a party committee, an exempt donor or a political action committee not required to register as a ballot question committee under section 1052-A, subsection 1-A, paragraph A.

3. Contribution. “Contribution” includes:

- A.** A gift, subscription, loan, advance or deposit of money or anything of value made to or received by a committee for the purpose of initiating or influencing a campaign, including but not limited to:
 - (1)** Funds that the contributor specified were given, in whole or in part, in connection with a campaign;
 - (2)** Funds provided in response to a solicitation that would lead the contributor to believe that the funds would be used specifically, in whole or in part, for the purpose of initiating or influencing a campaign; and
 - (3)** Funds that can reasonably be determined to have been provided by the contributor for the purpose of initiating or influencing a campaign when viewed in the context of the contribution and the recipient committee’s activities regarding a campaign;

A-1. Any funds deposited or transferred into the campaign account described in section 1054;

B. [2025, ch. 224, § 17 (RP).]

C. Any funds received by a committee that are to be transferred to any candidate, committee, campaign or organization for the purpose of initiating or influencing a campaign; or

D. The payment, by any person or organization, of compensation for the personal services of other persons provided to a committee that is used by the committee to initiate or influence a campaign.

“Contribution” does not include a loan of money by a financial institution made in accordance with applicable banking laws and regulations and in the ordinary course of business.

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

A. Contributions of money to candidates, party committees, political action committees or ballot question committees registered with the commission or a municipality; or

B. Payments for goods or services with an aggregate value of no more than \$100,000 contributed to candidates, party committees, political action committees or ballot question committees registered with the commission or a municipality.

4. Expenditure. The term “expenditure”:

A. Includes:

(1) A purchase, payment, distribution, loan, advance, deposit or gift of money or anything of value, made for the purpose of initiating or influencing a campaign;

(1-A) Any purchase, payment, distribution, loan, advance, deposit or gift of money made from the campaign account described in section 1054;

(2) A contract, promise or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure for the purposes set forth in this paragraph; and

(3) The transfer of funds by a political action committee to another candidate or political committee; and

B. Does not include:

(1) Any news story, commentary or editorial distributed through the facilities of any broadcasting station, cable television system, newspaper, magazine or other periodical publication, unless these facilities are owned or controlled by any political party, political committee, candidate or the spouse or domestic partner of a candidate;

(2) Activity designed to encourage individuals to register to vote or to vote, if that activity or communication does not mention a clearly identified candidate;

(3) Any communication by any membership organization or corporation to its members or stockholders, if that membership organization or corporation is not organized primarily for the purpose of influencing the nomination or election of any person to state or county office;

(4) The use of real or personal property and the cost of invitations, food and beverages, voluntarily provided by a political action committee in rendering voluntary personal services for candidate-related activities, if the cumulative value of these activities by the political action committee on behalf of any candidate does not exceed \$250 with respect to any election;

(5) Any unreimbursed travel expenses incurred and paid for by a political action committee that volunteers personal services to a candidate, if the cumulative amount of these expenses does not exceed \$100 with respect to any election;

(6) Any communication by a committee that is not made for the purpose of influencing the nomination or election of any person to state or county office; and

(7) Any payments to initiate a people's veto referendum or the direct initiative of legislation made prior to the submission of an application to the Department of the Secretary of State as provided in section 901.

4-A. Influence. "Influence" means to promote, support, oppose or defeat.

4-B. Initiate. "Initiate" includes the collection of signatures on petitions and related activities to qualify a state or local initiative or referendum for the ballot.

4-C. Leadership political action committee. [2023, ch. 244, § 11 (RP).]

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

A. Includes:

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

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

B. Does not include:

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

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

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

(4) An exempt donor.

6. Separate segregated fund committee. [2023, ch. 244, § 12 (RP).]

21-A M.R.S. § 1052-A. Registration

A committee shall register with the commission and amend its registration as required by this section. A registration is not timely filed unless it contains all the information required in this section.

1. Deadlines to file and amend registrations. A committee shall register and file amendments with the commission according to the following schedule.

A. A political action committee as defined under section 1052, subsection 5, paragraph A, subparagraph (1) or (5) shall register with the commission within 7 days of receiving contributions or making expenditures in the aggregate in excess of \$2,500. ...

21-A M.R.S. § 1053-B. Out-of-state committees

An organization that is registered as a political action committee, ballot question committee or political committee with the Federal Election Commission or a jurisdiction outside of this State shall register and file reports with the commission in accordance with this subchapter upon receiving contributions or making expenditures to initiate or influence a campaign in the State in excess of the amounts that would require registration under section 1052-A. The committee is not required to register and file reports if the committee's only financial activity within the State is to make contributions to candidates, party committees, political action committees or ballot question committees registered with the commission or a municipality and the committee has not raised and accepted any contributions during the calendar year to influence a campaign in this State.

21-A M.R.S. § 1054. Appointment of treasurer; segregated campaign account

1. Appointment of treasurer. A committee required to register under section 1052-A shall appoint a treasurer before registering with the commission.

2. Segregated campaign account. A committee registered under section 1052-A shall establish a separate account in a bank or other financial institution, referred to in this section as a "campaign account." The committee shall deposit all funds contributed to or received by the committee for the purpose of initiating or influencing a campaign in the campaign account and shall finance all of the committee's expenditures to initiate or influence the campaign through the campaign account. If a business or corporate entity has established the committee, the campaign account must be segregated from the general treasury funds of the entity that established the committee. If the committee is established by one or more individuals, the campaign account must be segregated from and not commingled with the personal funds of those individuals.

3. Exceptions. The commission may adopt procedures by rule for waiving the requirement under subsection 2 to maintain a segregated campaign account upon a showing by a committee that a separate account would be administratively burdensome, including but not limited to committees organized outside this State or an individual who registers as a ballot question committee. If the committee was formed by another organization, that other organization may pay its employees for their campaign-related activities on behalf of the committee through its own treasury, rather than the campaign account. Rules adopted pursuant to this subsection are routine technical rules as defined by Title 5, chapter 375, subchapter 2-A.

21-A M.R.S. § 1059. Report; filing requirements

A committee required to register under section 1052-A or 1053-B shall file an initial campaign finance report within 7 days of registration or within 14 days of having been required to register, whichever comes first, and thereafter shall file reports in compliance with this section. All reports must be filed by 11:59 p.m. on the day of the filing deadline, except that reports submitted to a municipal clerk must be filed by the close of business on the day of the filing deadline.

- 1. Contents; quarterly reports and election year reports.** [2007, ch. 443, § A-35 (RP).]
- 2. Reporting schedule.** A committee shall file reports according to the following schedule.
 - A.** A committee shall file quarterly reports:
 - (1) On January 15th, and the report must be complete as of December 31st;
 - (2) On April 10th, and the report must be complete as of March 31st;
 - (3) On July 15th, and the report must be complete as of June 30th; and
 - (4) On October 5th, and the report must be complete as of September 30th. ...

21-A M.R.S. § 1060. Content of reports

The reports must contain the following information and any additional information required by the commission to monitor the activities of committees:

- 1. Identification of candidates.** The names of and offices sought by all candidates whose campaigns the committee supports or intends to influence;
- 2. Identification of committees; parties.** The names of all political committees or party committees supported in any way by the committee;
- 3. Identification of ballot question campaigns.** The ballot question campaigns that the committee intends to initiate or influence;
- 4. Itemized expenditures.** An itemization of each expenditure made to initiate or influence any campaign, including the date, payee and purpose of the expenditure and the name of each candidate, and each referendum or initiated petition supported or opposed by the expenditure. If expenditures were made to a person described in section 1012, subsection 3, paragraph A, subparagraph (4), the report must contain the name of the person; the amount spent by that person on behalf of the committee, including, but not limited to, expenditures made during the signature gathering phase; the reason for the expenditure; and the date of the expenditure. The commission may specify the categories of expenditures that are to be reported to enable the commission to closely monitor the activities of committees;
- 5. Aggregate expenditures.** Repealed
- 6. Identification of contributions.** An itemization of each contribution of more than \$50 made to or received by the committee for the purpose of initiating or influencing a campaign, including the name, occupation, places of business and mailing address of each contributor and the amount and date of the contribution;
- 6-A. Funds deposited into campaign account.** Any funds deposited into or transferred into the campaign account described in section 1054, including but not limited to funds from the general treasury of an organization that is required to establish a committee; and
- 7. Other payments.** Operational expenses and any other payments made from the campaign account described in section 1054.

21-A M.R.S. § 1062-A. Failure to file on time

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

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

- A.** A valid emergency of the committee treasurer determined by the commission, in the interest of the sound administration of justice, to warrant the waiver of the penalty in whole or in part;
- B.** An error by the commission staff; or
- C.** Other circumstances determined by the commission that warrant mitigation of the penalty, based upon relevant evidence presented that a bona fide effort was made to file the report in accordance with the statutory requirements, including, but not limited to, unexplained delays in postal service or interruptions in Internet service.

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

- A.** For the first violation, 2%;
- B.** For the 2nd violation, 4%; and
- C.** For the 3rd and subsequent violations, 6%.

Any penalty of less than \$25 is waived.

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

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

4. Maximum penalties. The maximum penalty under this subchapter is \$10,000 for reports required under section 1053-A or 1059, except that if the dollar amount of the financial activity that was not timely filed or did not substantially conform to the reporting requirements of this subchapter exceeds \$50,000, the maximum penalty is 100% of the dollar amount of that financial activity.

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

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

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

7. List of late-filing committees. [2025, ch. 224, § 26 (RP).]

8. Penalties for failure to file report. If the commission staff finds that a committee or other person has failed to file a report required under this subchapter, the commission staff shall send by regular mail and e-mail a notice to the committee treasurer or other responsible officer within 3 business days following the filing deadline informing the committee treasurer or other responsible officer that the report has not been received. If the report remains unfiled after 10 days, the commission staff shall send another notice by regular mail and e-mail. If the committee or other person has not filed the report after these 2 notices, commission staff may refer the violation to the commission, which may, after providing notice and an opportunity to be heard, determine whether a violation has occurred and, if so, the amount of any penalty. The maximum penalty for failure to file a report required under section 1059 is \$10,000 or the amount of financial activity not reported, whichever is greater. A person who fails to file a report as required by this subchapter after the commission has sent the first 2 notices required in this subsection is guilty of a Class E crime, except that, if a penalty is assessed pursuant to this subsection and collected by the commission, the State may not prosecute a violation under this subsection.

8-A. Penalties for failure to file report. [2025, ch. 224, § 28 (RP).]

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