



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  
Heidi Hoefler, Political Committee and Lobbyist Registrar  
Date: September 8, 2025  
Re: Penalty Waiver Request by ActBlue Maine PAC

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ActBlue is a national fundraising platform that allows Democratic candidates and groups to receive online contributions from donors. It registered a political action committee (PAC) with the Commission (ActBlue Maine) to disclose money received from donors and transferred to Maine candidates and committees. The PAC was required to file a quarterly campaign finance report on July 15, 2025 covering the period of April 1 - June 30, 2025. Because it received \$1.2 million from donors for Maine candidates and committees during the period and filed the report 14 days late, the preliminary penalty for the late-filed report is \$683,731 based on the formula in statute. ActBlue requests a full or partial waiver. ETH 1-13. Commission staff recommends a reduction of 80% - 85% and assessing a final penalty in the range of \$102,560 - \$136,746.

#### **LEGAL REQUIREMENTS (ETH 25-26)**

Late-Filed Quarterly Report. A registered PAC must file quarterly reports according to a schedule set forth in statute. 21-A M.R.S. § 1059. The quarterly report for the second quarter (April 1 – June 30) is due on or before 11:59 p.m. on July 15. 21-A M.R.S. § 1059(2)(A)(3). If a PAC is late in filing a quarterly report, the statutory amount of the preliminary penalty is determined by the greater of total contributions or expenditures for the reporting period, multiplied by a percentage based on the number of violations in a 2-year period that resets on January 1 of each even-numbered year, multiplied by the number of calendar days the report was late. 21-A M.R.S. § 1062-A(2). The Commission may waive or reduce the penalty if it determines the report was late due to mitigating circumstances, which are defined as: (1) a valid emergency; (2) an error made by the Commission staff; or (3) relevant evidence the committee made a bona fide effort to file the report on time. The Commission may also waive or reduce the

penalty if it is disproportionate to the level of experience of the person filing the report or the harm suffered by the public from the late disclosure. 21-A M.R.S. § 1062-A(3).

## **DISCUSSION**

Upload Feature in Commission's eFiling System (also referred to as Electronic Data Interchange, EDI, or the import manager)

The Commission's eFiling software contains an upload (EDI) feature that is used by several statewide campaigns in Maine that have a very large number of contribution and expenditure transactions to report (*e.g.*, gubernatorial candidates, state parties, large PACs and ballot question committees). These campaigns maintain records of their financial activity in their own software and upload the data to the Commission's eFiling system in carefully formatted excel tables. This saves the campaigns the work of entering the transactions by hand. Often, our EDI filers hire a compliance firm specializing in maintaining political data to perform the upload. The firm's job is to ensure that the data is formatted correctly and the uploads are successfully completed by the filing deadline.

*System requirements are technical.* Maine's EDI feature requires the filers to format the data carefully to meet certain specifications. First and foremost, the filer needs to use an excel template that is available on our eFiling system to ensure that transactional information required by law is uploaded in particular columns. For example, when uploading expenditures, there is a column for the type of payee which requires certain two-digit codes (*e.g.*, 01, 02, 03) to distinguish whether the payee is an individual, business, political action committee, party committee, *etc.* Also, the data needs to be formatted correctly. For example, if a contributor is from Brunswick, Maine, their zip code must be uploaded as 04011 (including the leading zero) rather than 4011.

The system provides the filer with a "warning" or "error" message if it receives data that the system detects may be inaccurate or inconsistent. For example, if a filer uploads an expenditure that the filer made to the House Democratic Campaign Committee (a PAC), the filer needs to indicate through the correct two-digit code that the House Democratic Campaign Committee is a PAC, rather than a party committee. If the system detects that the zip code for a contributor is incorrect based on the contributor's town, the system will give the filer a warning

or error message. After the filer uploads the data, the eFiling system sends the filer an “MECF-Data Import Results” email that provides a transaction number and a reason for every warning or error. ActBlue Maine included two of these results emails in the appendices to its waiver request. ETH 6-7, 9-10.

The specifications are based on the design of our IT vendor’s database. Our vendor has judged these specifications to be necessary for the accurate display of filer data to the public. Consequently, EDI filers must exert a high degree of attention to the specifications. Often, pressing the Upload or File button is not the final step in the EDI filing process. In many cases, the filer must subsequently modify the data based on warning or error messages or amend a filed report to successfully complete the filing.

It does not occur every deadline, but if one EDI filer experiences a serious obstacle when uploading data, that can create a blockage that stalls subsequent EDI uploads by other filers on the same day. On Friday, July 11, 2025 (the date of ActBlue’s first attempted upload), there was a problem with an EDI upload by the Maine Democratic State Committee. That stalled other attempted uploads on July 11<sup>th</sup>, such as ActBlue’s. Once the Commission staff became aware of this problem, we contacted our IT vendor who intervened on Monday, July 14<sup>th</sup> to reactivate the uploads flowing through the pipeline. That is why ActBlue Maine received its first MECF-Data Import Results email at 10:37 a.m. on July 14<sup>th</sup>. ETH-6.

The Commission staff’s understanding is that our current system can handle even very large data uploads within a reasonable amount of time (we estimate 5-15 minutes). To the best of our knowledge, large EDI filers do not need to wait overnight for the system to “process” an upload.

By January 1, 2026, the Commission staff expects to move to a new eFiling system developed by a different vendor, whom we expect will be more responsive in making improvements at affordable fees and fixing problems. Because of this transition, PACs wishing to upload data (such as ActBlue) will need to use the EDI feature only one or two more times.

#### Preliminary Late-Filing Penalty for July Quarterly Report

As stated above, the PAC must file quarterly reports according to the schedule set forth in statute. The quarterly report for the second quarter of calendar year 2025, which covers the reporting period of April 1 – June 30, 2025, was due on or before 11:59 p.m. on July 15, 2025

(the “July Quarterly Report”). Despite deadline reminders before and on the due date sent by the Commission’s eFiling system and by the Commission staff, the report was not filed until July 29, 2025, 14 calendar days after the deadline. The cover page for the report is attached as ETH-14. As was the case with the late-filed quarterly report due in April 2025 discussed below, the ActBlue employee who first communicated with the Commission staff after the filing deadline was the only person at ActBlue who communicated with the Commission staff about the filing and the issues experienced when attempting to upload data to the eFiling system. Using the statutory formula as outlined in the table below, and factoring in that this is the second violation in the 2-year period which set the penalty rate at 4%, the Commission staff determined the preliminary penalty for this violation was \$683,731. ETH 15-16.

<b>Report Name</b>	<b>Activity Amount</b>	<b>Due Date</b>	<b>Days Late</b>	<b>Penalty Rate</b>	<b>Penalty</b>
July Quarterly	\$1,220,948	07/15/2025	14	4%	\$683,731

#### Waiver Request by ActBlue Maine

The ActBlue Maine PAC requests a waiver of the preliminary \$683,731 late filing penalty through an August 21, 2025 letter from George Gilmer, who is the treasurer of the PAC. ETH 1-13. To the best of the Commission staff’s knowledge, Mr. Gilmer was not directly involved in the filing of the July 2025 quarterly report or the April 2025 report which was also late (discussed below). Rather, a single ActBlue employee was apparently responsible for filing those two reports.

ActBlue Maine’s request for a waiver of the preliminary penalty is based on:

- its good faith attempt to file the July 2025 quarterly report on time,
- its unique identity as a national fundraising platform which was required to upload nearly 13,000 transactions in the quarterly report,
- software errors resulting from ActBlue’s outsized number of transactions, and
- system delays in processing filings.

ActBlue describes its good-faith efforts to file the July report on page 3 of Mr. Gilmer’s letter. ETH-3. Those efforts include trying to upload data on July 11 and 15, communicating with Heidi Hoefler about next steps in the upload process, and responding to warnings and error messages.

ETH 17-21. ActBlue also argues that the preliminary penalty of \$683,731 preliminary penalty is excessive.

#### Late April 2025 Quarterly Report

The PAC's 2025 first quarter report (the "April Quarterly Report"), which covers the reporting period of January 1 - March 31, 2025, was due on or before 11:59 p.m. on April 10, 2025. In spite of deadline reminders, the report was filed 25 calendar days after the deadline. A notice of late filing and preliminary penalty was sent to ActBlue. Since this was the first violation in the 2-year period, the penalty rate was 2%. ActBlue chose to pay the penalty of \$90,134 and did not ask for a waiver.

#### Contributing Factors to the Late July 2025 Report

In assessing the degree of fault of ActBlue Maine in filing the July 2025 quarterly PAC report 14 days late, the Commission staff readily acknowledges that ActBlue made a genuine effort to file the July report and had to contend with certain practical issues such as responding to EDI warning/error messages, possibly a shortage of available staff that required hiring an outside contractor, and requirements during July to make campaign finance and tax filings in 15 other jurisdictions. The Commission is not in a position to know the full extent of those efforts.

Nevertheless, from the Commission staff's perspective, we conclude ActBlue Maine could have filed the July quarterly report significantly earlier if ActBlue had started sooner after the June 30<sup>th</sup> close of the report period, responded more quickly to communications by the Commission's staff and our eFiling system, and applied greater staff time to filing the July report. Our assessment is that the responsibility for the late filing lies with ActBlue as an organization rather than its employee who was responsible for filing the July and April reports.

The following considerations support our "diagnosis" that ActBlue could have filed the July 2025 quarterly report earlier if had started sooner, applied greater staff time, and communicated better. As you read these points, you may wish to refer to the calendar for July 2025 that is inserted on the next page:

- The cut-off date for the July quarterly report was June 30, 2025, but ActBlue did not log into the Commission's eFiling system until *eleven days later* (July 11<sup>th</sup>) to upload data. Why didn't ActBlue attempt an upload earlier, particularly since it paid a

significant penalty for not filing the April 2025 quarterly report on time? *See* attached event log showing logins by ActBlue Maine personnel. ETH-17.

Su	M	T	W	Th	F	Sa
29	30 End of report period	1	2	3	4	5
<b>6</b>	7	8	9	10	11 First upload	12
13	14	15 <b>Deadline,</b> 2 <sup>nd</sup> upload	16	17	18	19
20	21 Advice by Ms. Hoefler	22	23	24 Login by ActBlue	25 Login by ActBlue	26
27	28 Login by ActBlue	29 <b>Report filed</b>				

- The Commission’s Political Committee and Lobbyist Registrar, Heidi Hoefler, was eager to provide any assistance ActBlue Maine required concerning the EDI upload feature, consistent with her other responsibilities. In emails to ActBlue staff, Ms. Hoefler tried to underscore the urgency of the situation and that penalties were accumulating daily. ETH-18. Nevertheless, the PAC filed the report 14 days late and only after repeated attempts by Ms. Hoefler to get ActBlue’s attention.
- ActBlue Maine was non-responsive or slow to respond to information received from the eFiling system or Ms. Hoefler. For example, the PAC tried its second upload on July 15, 2025 and received the MECF-Data Import Results email at 11:06 a.m. that same day. Since this was *the filing deadline*, one would expect the PAC to reach out to Ms. Hoefler immediately about next steps to completing the filing, but Ms. Hoefler did not hear from the PAC until July 17<sup>th</sup>, two days after the deadline.
- On Monday, July 21, Ms. Hoefler sent an email to ActBlue staff summarizing advice from our IT vendor about what ActBlue needed to do to complete the EDI upload. Ms. Hoefler offered her additional assistance and asked for a response as soon as possible how ActBlue would like to proceed. After not hearing any response, she emailed ActBlue staff on July 22. Still not hearing a response, she tried again on July 24. This email correspondence is attached. ETH 18-21.

- In spite of Ms. Hoefler's advice on Monday, July 21, the report was not filed until eight days later on July 29. The Commission staff does not know exactly the source of the delay (we note the event log shows that ActBlue logged into our system on July 24, 25, and 28). ETH-17. Our belief is that the PAC should not have needed eight days to address the warnings and errors in the upload results.
- Some of the EDI errors made by ActBlue in the July 2025 report seem avoidable. For example, our IT vendor told us on July 18 that ActBlue did not use the required EDI template, although the Commission staff cannot independently confirm that. ActBlue's zip code data for contributions did not include the leading zero in Maine zip codes.

## **STAFF RECOMMENDATION**

Commission staff agrees that the preliminary penalty of \$683,731 is disproportionately high relative to the harm suffered by the public. We recommend an 80% - 85% reduction to somewhere in the range of \$102,560 - \$136,746. We believe a penalty within this range would balance the following factors.

### Factors in support of a significant penalty

(1) ActBlue is a nonprofit with expertise in political financial data, presumably with staff members that have experience in IT or compliance. It is a sophisticated filer that should be held to a high standard for timeliness.

(2) In setting up penalty procedures for late filing of campaign finance reports, the Maine Legislature directed that successive late-filing violations within a calendar year should result in increasing penalties. ActBlue Maine filed the April 2025 quarterly report 25 days late, resulting in its payment of a late-filing penalty of \$90,133. This should have caused ActBlue to prioritize filing reports in Maine on time, but that apparently didn't happen for the July quarterly report. A significant penalty for the July report is justified to make sure that, with respect to future deadlines, ActBlue gets an early start, assigns the necessary staff, and establishes effective channels of communication.

(3) The preliminary penalty of \$683,731 reflects that \$1.2 million in contributions and \$1.2 million in expenditures were disclosed to the Maine public two weeks after the deadline.

ETH-14. The final penalty should be proportional to reflect this very large amount of financial activity that was reported late.

(4) The Commission staff appreciates that ActBlue needed to file campaign finance or tax reports in 15 other jurisdictions which may have required hiring an outside compliance firm to assist its permanent staff. We would urge the Commission not to put too much weight on this factor, however. Candidate and ballot question campaigns in Maine are often short-staffed. ActBlue is a large nonprofit that should be expected to obtain staffing sufficient to get the job done on time in all jurisdictions.

(5) Until the April 2025 quarterly PAC report, we believe ActBlue Maine had a positive history since 2006 of successfully using the EDI feature to file campaign finance reports on time. This includes very large reports filed in October 2021 and October 2022. The EDI feature and the required templates have not changed during these years. ActBlue Maine has demonstrated that it can regularly file very large data files through Maine's EDI functionality. This enforcement process should incentivize ActBlue to overcome the short-term issues it has experienced in 2025 to return to its prior successful record of on-time filing.

#### Factors supporting a waiver

(1) The preliminary penalty of \$683,731 would be the highest penalty on record for a routine late-filing violation, and is disproportionately high relative to the public harm. ETH 22-24.

(2) ActBlue Maine was not completely inattentive or careless with respect to the July 15, 2025 filing deadline. The PAC wanted to file the July 15, 2025 report on time and *did* make an effort, including two attempted uploads on July 11 and 15. It simply wasn't enough to get the job done on time or even within one week of the deadline. It should not have taken ActBlue Maine until July 29<sup>th</sup> to file a quarterly report for a period that ended 29 days earlier on June 30, 2025.

(3) The informational harm to the public resulting from ActBlue's late filing is reduced somewhat because some of the contributions to Democratic candidates and committees received by ActBlue during the second quarter of 2025 were also disclosed by the Democratic candidates or committees that filed a campaign finance report on July 15, 2025. For example, ActBlue's July quarterly report contained a \$4,150 contribution from writer Stephen King to gubernatorial candidate Hannah Pingree on April 23, 2025 (\$2,075 for the 2026 primary election and \$2,075



for the 2026 general election). Although ActBlue filed its report two weeks late, the public could access information about that contribution on Ms. Pingree's campaign finance report that she filed on time on July 15, 2025.

(4) Commission staff believes the recommended penalty range of \$102,560 - \$136,746 is sufficient to deter late reporting by ActBlue Maine in the future and as a precedent to encourage on-time filing by PACs generally. We note that a penalty in the recommended range would be roughly three times the highest penalty assessed by the Commission for routine late-filed reports since April 2018.<sup>1</sup>

#### Advice Concerning Next PAC Deadline

Commission staff notes that the next 2025 PAC deadline is October 6, 2025, which is only six days after the September 30, 2025 cut-off date for the report. Thus, PACs will have even less time to assemble and file data than they did for the quarterly report due in July. Commission staff advises ActBlue to amend its PAC registration to add the employee responsible for filing campaign finance reports as an authorized agent so that they promptly receive automated emails from our eFiling system. If there is an email address for the PAC treasurer that is more effective, we would encourage that change as well.

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<sup>1</sup> The Commission assessed penalties totaling \$35,000 on 2/28/2022 against Mainers for Local Power for filing two 24-hour reports late and penalties totaling \$35,000 on 11/29/2023 against Maine Automotive Right to Repair for not transmitting six major contributor notices to contributors and the Commission on time. Final penalty determinations made by the Commission members since April 2018 are listed in a chart among the attached materials. ETH 22-24. Please note that this data does not include late-filing penalties that candidates and committees voluntarily paid without asking for any determination by the members of the Commission.

August 21, 2025

Maine Commission on Government Ethics and Election Practices  
Attn: Heidi Hoefler, Esquire  
Political Committee & Lobbyist Registrar  
135 State House Station  
Augusta, ME 04333  
[Heidi.Hoefler@maine.gov](mailto:Heidi.Hoefler@maine.gov)

**Via Email**

Dear Ms. Hoefler:

ActBlue is in receipt of the Maine Commission on Government Ethics and Election Practice's ("Commission" or "MECF") letter dated July 31, 2025 ("Penalty Letter"). By way of background, ActBlue operates and maintains the website [secure.actblue.com](https://secure.actblue.com), which provides an internet-based platform for candidates, committees and organizations to solicit and process donations. Unlike other political action committees, ActBlue serves only as a platform. Our donors decide where to send their contributions and we facilitate their transfer. ActBlue has enabled millions of people looking to make a financial impact for Democratic Party campaigns and aligned organizations and causes for over twenty years. ActBlue has been, and remains, committed to full compliance with all federal, state and local laws and regulations in the places that it operates.

We understand the mechanism used by the Commission to calculate the penalty and do not question its application or the Commission's good faith in this matter. We do, however, ask the Commission to waive this penalty entirely or reduce it substantially in recognition of the mitigating circumstances, consistent with state law,<sup>1</sup> that are unique to this matter. The \$683,730.61 preliminary penalty assessed here is excessive. It towers above all previously published MECF penalties, and is in fact, more than the total of all preliminary penalties

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<sup>1</sup> 21-A M.R.S. §§ 1062-A(2), 1020-A(2) (ver. effective before September 25, 2025).

Heidi Hoefler, Esq.  
August 21, 2025

assessed by the Commission between 2018 and early 2021.<sup>2</sup> The Commission's 2018-present final penalty reduction determinations reflect an average 88.47 percent reduction from the preliminary penalties assessed during this period, including all penalties accepted without request for Commission determination.<sup>3</sup> We ask for at least the same, if not greater, reduction here.

The circumstances of ActBlue's unique identity as the facilitator of others' contributions, MECF filing software errors resulting from the outsized number of reportable transactions, system delays in processing our attempted filings, and ActBlue's efforts to overcome system errors to make the July 15 filing support this request.

ActBlue reported nearly 13,000 Maine committees transactions in the second quarter because ActBlue aggregates Maine contributions from a national contributor base. That unusually high volume led to both the MECF system errors that we could not resolve, even with Ms. Hoefler's timely assistance, and to the historically large late filing penalty. ActBlue files similar or larger datasets in many other jurisdictions, but has not experienced this difficulty even in states that use the same process, such as New Mexico. It appears unique to Maine.

ActBlue staff found that uploading this very large July filing dataset went fairly quickly, but the MECF system took hours, often overnight, to process it after each filing attempt. This system processing delay contributed significantly, and unavoidably by ActBlue, to the late filing. For example, the system responded to ActBlue's Friday, July 11 filing attempt on Monday, July 14,<sup>4</sup> thus delaying our second pre-deadline filing attempt. If ActBlue had a smaller dataset, as is typical for other Maine filers, or if the MECF system could process the submission in a reasonable amount of time, ActBlue very likely would have filed successfully on time. ActBlue's inability to attempt a re-file while the system actively processed the last filing is a significant mitigating factor.

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<sup>2</sup> Maine Commission on Government Ethics and Election Practices, *Commission Penalty Decisions – PACs, BQCs, Party Committees (2018-Present)* (reporting \$1,084,594.40 Preliminary Penalty and \$125,050.58 Final Penalty total amounts) ("Penalty Chart").

<sup>3</sup> Penalty Chart (sum of all Preliminary Penalties issued between April 25, 2018 and May 26, 2021).

<sup>4</sup> Maine Commission on Government Ethics and Election Practices, MECF-Data Import Results [EDI] email dated July 14, 2025 at 10:37 am (reporting failed Data Import File Submitted on July 11, 2025), attached as Appendix A ("July 14 Results Email") (omitting the last six pages of data for brevity).

ActBlue's repeated and good faith attempts to file the July report, several times, before the July 15 deadline is another mitigating factor supporting waiver or significant reduction of the preliminary penalty. Below is a timeline of ActBlue's pre-deadline efforts and the MECF staff's much appreciated efforts to resolve system errors that delayed the final filing:

1. Following its late-filed April 2025 report, ActBlue hired a respected third-party compliance firm to assist in its compliance work. This firm shadowed and assisted ActBlue with compiling and formatting reports in the days leading up to ActBlue's first attempt to submit its July report to the Commission. ActBlue staff also applied lessons learned from the somewhat smaller, late-filed April report to the July report.
2. ActBlue staff initiated submission of the report on Friday, July 11 while also working on the fifteen other state, Federal Election Commission and IRS quarterly/semi-annual reports due in July. In this attempted filing, the system's MECF Data Import Results returned to us on July 14 via system-generated email indicated 12,832 contributions, returns and expenditures processed, with only 37 Error Records Bypassed.<sup>5</sup> We note that many of the problems resulted from system errors in handling Maine zip codes that begin with zero and can result in upload problems from suddenly three- or four-digit zip code results. ActBlue made this attempted, but failed, filing in the week before the deadline, with the vast majority (roughly 99.8 percent) apparently successful but ultimately rejected due to the handful of error records bypassed. Resolving the 37 errors took the remainder of time to complete the report. These pre-deadline efforts included a July 11 Zoom meeting between ActBlue and Ms. Hoefler. The recipient committees' corresponding disclosure in their July reports met the public's need for timely disclosure of reportable campaign finance activity. ActBlue's filing challenges, unlike, for example, a ballot question or independent expenditure filer's failure to disclose its transactions, did not prevent the public disclosure of those recipients' ActBlue receipts.
3. On Monday, July 14, ActBlue staff joined Ms. Hoefler again in a Zoom call to attempt resolution the system errors that caused the late filing. Note the July 12-13 weekend, as well as the long system response (July 11 to 14), that contributed to the late filing.
4. On Tuesday, July 15, ActBlue re-attempted the upload. The MECF-Data Import Results [EDI] report disclosed the same number of contributions, returns and expenditures processed as the July 11 upload, with only nine more posted, but with 12,815 duplicates bypassed and 383 pages of data error details.<sup>6</sup>

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<sup>5</sup> July 14 Results Email.

<sup>6</sup> Maine Commission on Government Ethics and Election Practices, MECF-Data Import Results [EDI] email dated July 15, 2025 at 11:06 am (reporting failed Data File Submitted on July 15, 2025), attached as Appendix B (omitting 353 pages of data for brevity).

Heidi Hoefler, Esq.  
August 21, 2025

5. We received the “Notice of Unfiled Report” from the MECF on Wednesday, July 16.<sup>7</sup>
6. ActBlue staff contacted Ms. Hoefler via telephone on July 17, 2025 and email until successfully submitting its report on July 29, 2025.<sup>8</sup> ActBlue staff was finally able to submit the report after reentering the same data into a blank Commission template, which was—to ActBlue’s best belief and recollection—the same method used on July 11 for the first attempted filing.

Given the facts leading to this inadvertently late filing, the MECF filing system’s long delays in processing data errors and generating result reports that hindered ActBlue’s responses, and the unprecedented size of the preliminary penalty, we request waiver of the penalty or a very significant reduction. ActBlue and MECF staff worked together, before and after the July 15 deadline, to make this oversized filing. Unlike instances in the MECF penalty appeal record that show significant reductions despite filers’ inattention or completely missed filing deadlines,<sup>9</sup> ActBlue worked in good faith before the deadline to make a timely filing. System errors unique to this filer’s massive data counts exacerbated the problem. Filers submitting more typical volumes of data likely would not face this issue at all. Together, these mitigating factors support our request. The Commission has statutory authority to grant it. Equitable treatment under applicable Maine law is all we ask.

Thank you for your consideration, particularly the seven-day extension to file this appeal following our retention of outside campaign finance legal counsel.

Respectfully submitted,



George Gilmer  
Treasurer, ActBlue Maine

cc/Encl: Jeffrey J. Hunter, Kelley Drye & Warren PLLC

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<sup>7</sup> Maine Commission on Government Ethics and Election Practices, Notice of Unfiled Report email dated July 16, 2025 at 12:03 am, attached as Appendix C.

<sup>8</sup> We recognize the difficulty Ms. Hoefler experienced in calling back (lack of storage space in ActBlue staff voicemail, etc.) and are grateful for the full support she provided to us throughout this difficult situation.

<sup>9</sup> E.g., MECF Staff Memo to Commissioners dated Nov. 15, 2023 in the matter of Genuine Parts Company Penalty (reducing a \$50,000 preliminary penalty to \$5,000 despite filer’s lack of pre-deadline filing attempt, representing a 90 percent reduction).

## Appendix A



## MECF-Data Import Results [EDI]

1 message

ethics via treasurer [REDACTED]

Mon, Jul 14, 2025 at 10:37 AM

Reply-To: ethics@maine.gov

To: [REDACTED]

Cc: ethics@maine.gov

Data Import File Submitted on 07/11/2025

Description: Maine compliance report for 2025-04-01 to  
2025-06-30

Committee ID: 2081

Record Date Range: 04/01/2025 - 06/30/2025

Contributions Processed:	12442	Contributions Posted:	12433
Contribution Returns Processed:	26	Contribution Returns Posted:	26
Expenditures Processed:	384	Expenditures Posted:	356
Expenditure Returns Processed:	0	Expenditure Returns Posted:	0
Loans Processed:	0	Loans Posted:	0
Loan Payments Processed:	0	Loan Payments Posted:	0
Loan Forgiveness Processed:	0	Loan Forgiveness Posted:	0
Debts Processed:	0	Debts Posted:	0
Debt Payments Processed:	0	Debt Payments Posted:	0
Associated Candidates Processed:	0	Associated Candidates Posted:	0
Associated Ballot Questions Processed:	0	Associated Ballot Questions Posted:	0
Total Duplicates Bypassed:	0		
Total Error Records Bypassed:	37		
Total Errors:	37		
Total Warnings:	306		

**LIST OF ERRORS:****Record Type Reference Id Error Message**

Contribution	711907212	*. Invalid cbState *. Invalid cbZip
Contribution	712159360	*. Invalid cbState *. Invalid cbZip
Contribution	713541140	*. cbZip is required
Contribution	718322883	*. Invalid cbState *. Invalid cbZip
Contribution	721345482	*. Invalid cbState *. Invalid cbZip
Contribution	721474406	*. Invalid cbState *. Invalid cbZip
Contribution	721556689	*. Invalid cbState *. Invalid cbZip
Contribution	722571589	*. Invalid cbState
Contribution	722793076	*. Invalid cbState *. Invalid cbZip
Expenditure	2585280	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2584476	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2589341	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2589518	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2594738	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2594003	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2599337	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2600185	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2606952	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2605469	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2611850	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2611934	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2617391	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2617843	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2622172	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2622758	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2627935	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2629203	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2633350	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2633483	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2640605	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2639131	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2644915	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2644942	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2651717	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.
Expenditure	2650636	*. Invalid exOrgID. Please see the code Table for valid Expenditure Payee Type in the instructions file.



## Appendix B



## MECF-Data Import Results [EDI]

1 message

ethics via treasurer [REDACTED]

Tue, Jul 15, 2025 at 11:06 AM

Reply-To: ethics@maine.gov

To: [REDACTED]

Cc: ethics@maine.gov

Data Import File Submitted on 07/15/2025

Description: Maine compliance report for 2025-04-01 to  
2025-06-30

Committee ID: 2081

Record Date Range: 05/09/2025 - 06/30/2025

Contributions Processed:	12442	Contributions Posted:	9
Contribution Returns Processed:	26	Contribution Returns Posted:	0
Expenditures Processed:	384	Expenditures Posted:	0
Expenditure Returns Processed:	0	Expenditure Returns Posted:	0
Loans Processed:	0	Loans Posted:	0
Loan Payments Processed:	0	Loan Payments Posted:	0
Loan Forgiveness Processed:	0	Loan Forgiveness Posted:	0
Debts Processed:	0	Debts Posted:	0
Debt Payments Processed:	0	Debt Payments Posted:	0
Associated Candidates Processed:	0	Associated Candidates Posted:	0
Associated Ballot Questions Processed:	0	Associated Ballot Questions Posted:	0
Total Duplicates Bypassed:	12815		
Total Error Records Bypassed:	12843		
Total Errors:	12843		
Total Warnings:	306		

**LIST OF ERRORS:**

<b>Record Type</b>	<b>Reference Id</b>	<b>Error Message</b>
Contribution	703568010	*. Duplicate contributionID
Contribution	703583140	*. Duplicate contributionID
Contribution	703596330	*. Duplicate contributionID
Contribution	703612151	*. Duplicate contributionID
Contribution	703614165	*. Duplicate contributionID
Contribution	703621092	*. Duplicate contributionID
Contribution	703635915	*. Duplicate contributionID
Contribution	703647868	*. Duplicate contributionID
Contribution	703662430	*. Duplicate contributionID
Contribution	703671087	*. Duplicate contributionID
Contribution	703714689	*. Duplicate contributionID
Contribution	703726713	*. Duplicate contributionID
Contribution	703737673	*. Duplicate contributionID
Contribution	703740899	*. Duplicate contributionID
Contribution	703768786	*. Duplicate contributionID
Contribution	703814732	*. Duplicate contributionID
Contribution	703966411	*. Duplicate contributionID
Contribution	703970504	*. Duplicate contributionID
Contribution	703979541	*. Duplicate contributionID
Contribution	703980865	*. Duplicate contributionID
Contribution	704007779	*. Duplicate contributionID
Contribution	704012267	*. Duplicate contributionID
Contribution	704034781	*. Duplicate contributionID
Contribution	704061786	*. Duplicate contributionID
Contribution	704062292	*. Duplicate contributionID
Contribution	704071876	*. Duplicate contributionID
Contribution	704075736	*. Duplicate contributionID
Contribution	704078524	*. Duplicate contributionID
Contribution	704085444	*. Duplicate contributionID
Contribution	704093004	*. Duplicate contributionID
Contribution	704134865	*. Duplicate contributionID
Contribution	704146713	*. Duplicate contributionID
Contribution	704176292	*. Duplicate contributionID
Contribution	704203289	*. Duplicate contributionID
Contribution	704224636	*. Duplicate contributionID

## Appendix C



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## Notice of Unfiled Report

1 message

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ethics via treasurer [REDACTED]

Wed, Jul 16, 2025 at 12:03 AM

Reply-To: ethics@maine.gov

To: [REDACTED]

Maine Ethics Commission  
135 State House Station  
Augusta ME 04333-0135  
(207) 287-4179

07/16/2025

ACTBLUE MAINE

George Gilmer  
Treasurer

### **NOTICE OF PAST DUE REPORT**

According to our records, you have not filed the report listed below with the Maine Ethics Commission:

Report: Committee July Quarterly  
Due Date: 07/15/2025

Please file this report as soon as possible. Penalties for late -filed reports begin to accumulate from the day after the deadline until the report is filed

To file your report, log into the e-filing website at <https://mainecampaignfinance.com/>. If you need assistance in filing this report or have questions about the reporting requirements, please contact the Maine Ethics Commission staff at (207) 287-4179, or by email at [ethics@maine.gov](mailto:ethics@maine.gov).

If you believe you have received this e-mail in error, please contact us so that we can correct our records.

Thank you.

--

You received this message because you are subscribed to the Google Groups "treasurer" group.  
To unsubscribe from this group and stop receiving emails from it, send an email to [treasurer+unsubscribe@actblue.com](mailto:treasurer+unsubscribe@actblue.com).



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

## 2025 CAMPAIGN FINANCE REPORT

### FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
ACTBLUE MAINE PO Box 962017 Boston, MA 02196 PHONE:(617) 517-7600 EMAIL: TREASURER@ACTBLUE.COM		George Gilmer PO Box 962017 Boston, MA 02196 PHONE: EMAIL: TREASURER@ACTBLUE.COM	
REPORT	DUE DATE		REPORTING PERIOD
Committee July Quarterly	07/15/2025		04/01/2025 - 06/30/2025

#### FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$1,220,947.52	\$1,446,282.10
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)	\$1,220,947.52	\$1,446,282.10
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$1,220,937.36	\$1,446,138.04
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$1,220,937.36	\$1,446,138.04
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$20,557.05	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$1,220,947.52	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$1,220,937.36	
12. CASH BALANCE AT END OF PERIOD	\$20,567.21	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

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

REPORT FILED BY: George Gilmer  
REPORT FILED ON: 7/29/2025 3:16:29 PM  
LAST MODIFIED:  
COMMITTEE ID: 2081



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

Sent via Email and US Mail

July 31, 2025

George Gilmer, Treasurer  
ACTBLUE MAINE  
P.O. Box 962017  
Boston, MA 02196

Re: Notice of Late Filing of Committee Quarterly Report and Preliminary Penalty

Dear George Gilmore:

The Commission on Governmental Ethics and Election Practices (the "Commission") staff preliminarily found that the ACTBLUE MAINE political action committee (the "committee") was late in filing its Committee July Quarterly Report (the "report"). Although the report was due by 11:59 p.m. on July 15, 2025, it was not filed until July 29, 2025.

Per 21-A M.R.S. §1020-A, the late filing of the report triggers an enforcement process. Based on the amount of financial activity in the report, the number of calendar days the report was late, and any history of violations by the committee, the Commission staff determined the preliminary penalty for this violation is \$683,730.61 (see calculation matrix on next page). Please note that if between the date of this notice and December 31, 2025, the committee files another report that is late, the penalty percentage increases from 4% to 6% (see next page). Please see below for instructions on how to pay the penalty.

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

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

Sincerely,

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

Heidi Hoefler



Political Committee & Lobbyist Registrar  
**Committee Name:** ACTBLUE MAINE  
**Prior Violations:** 1

Report Name	Activity Amount	Due Date	Days Late	Penalty Rate	Penalty
Committee April Quarterly	\$1,220,947.52	07/15/2025	14	4%	\$683,730.61

The penalty for the late filing of a required report is a percentage of the total contributions or expenditures for the filing period, whichever is greater, multiplied by the number of calendar days the report is filed late, as follows:

For the first violation, 2%  
For the second violation, 4%  
For the third and each subsequent violation, 6%

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

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

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

## ACTBLUE Event Log – July 2025

### Event Log

<b>Report Filed - Committee July Quarterly</b>	<b>Gilmer, George</b>	<b>07.29.2025 3:17:20 PM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>07.28.2025 10:49:04 AM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>07.25.2025 10:48:05 AM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>07.24.2025 3:14:01 PM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>07.21.2025 12:54:22 PM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>07.17.2025 11:39:24 AM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>07.15.2025 2:55:10 PM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>07.15.2025 2:54:40 PM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>07.14.2025 2:47:43 PM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>07.14.2025 11:50:59 AM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>07.14.2025 11:31:44 AM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>07.11.2025 2:10:27 PM</b>
<b>User Login</b> User GGilmer logged in.	<b>Gilmer, George</b>	<b>06.16.2025 2:52:49 PM</b>

**From:** [Hoefler, Heidi](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: ActBlue Campaign Finance Report -- Summary of Errors and Next Steps re: Import Manager Function  
**Date:** Thursday, July 24, 2025 12:38:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hi [REDACTED] and George,

Since penalties for the late filing are accruing, I have tried reaching out multiple times re: the filing of the ActBlue quarterly campaign finance report that was due last week. [REDACTED] – the voice mailbox for the number you gave me continues to be full. George, I have tried experimenting with variations to see whether I could get an e-mail to you rather than to the general [REDACTED] e-mail address. The first time, I got it wrong. Perhaps this one will be delivered. Help me to help you!

Heidi

Heidi Hoefler, Esq.  
Political Committee & Lobbyist Registrar  
Maine Ethics Commission  
207.287.4709 (phone)

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**From:** Hoefler, Heidi  
**Sent:** Tuesday, July 22, 2025 12:51 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: ActBlue Campaign Finance Report -- Summary of Errors and Next Steps re: Import Manager Function  
**Importance:** High

Hi [REDACTED] and George,

Could you please let me know how you would like to proceed with getting this past-due report filed? If it is easier to talk rather than type, feel free to call.

Heidi

Heidi Hoefler, Esq.  
Political Committee & Lobbyist Registrar  
Maine Ethics Commission  
207.287.4709 (phone)

---

**From:** Hoefler, Heidi  
**Sent:** Monday, July 21, 2025 12:08 PM  
**To:** [REDACTED]  
**Subject:** RE: ActBlue Campaign Finance Report -- Summary of Errors and Next Steps re: Import Manager Function  
**Importance:** High

Hi [REDACTED],

Doing my best to try to summarize...here goes...

1. ActBlue did not use the system template. The zip code column on the file you provided to me is not correctly formatted and removes leading zeros which is causing a problem on each contribution.
2. The system is catching a mismatch on multiple contributions.
3. There are several expenditure errors which all appear to be Invalid exOrg. If you use Org IDs, they need to be valid. For example, entered an expenditure with exPayeeType 06 (Political Party Committee) and exOrgID of 269, which is the House Democratic Campaign Committee. This committee is a PAC (05), not a Political Party Committee (06).
4. Regarding the 153 warnings, they all seem to indicate a Possible Mismatch on the Payee IDs which could mean that the Payee ID used in this file is not an exact match with the Payee ID in the Contributor/Payee table from a prior import. For example, the first expenditure Warning listed uses Payee ID 42978 in the file that the Payee ID matches up with exOrg ID 5608. Name in the import file is Freeport Democratic Campaign but the name in the system with OrgID 5608 is Freeport Town Democratic Committee (system views this as a mismatch). Also, the address in the file is 83 Ringrose Road, and

but the address in the system for OrgID 5608 is 27 South Street (another mismatch). If you are going to use exOrgID, the information has to match, or for WARNINGS, the information will be imported using the exOrgID as they currently exist in the Contributor/Payee table. See below:

exPayerID	exPayeeType	exOrgID	exOrgName	exPayeeID	exFirstName	exMiddleName	exLastName	exNameSuffix	exAddress1	exAddress2	exCity	exState	exZip
2584583	6	5608	FREEPORT DEMOCRATIC COMMITTEE	42978					83 RINGROSE ROAD		FREEPORT	ME	4
2599725	6	5608	FREEPORT DEMOCRATIC COMMITTEE	42978					83 RINGROSE ROAD		FREEPORT	ME	4
2612443	6	5608	FREEPORT DEMOCRATIC COMMITTEE	42978					83 RINGROSE ROAD		FREEPORT	ME	4
2622576	6	5608	FREEPORT DEMOCRATIC COMMITTEE	42978					83 RINGROSE ROAD		FREEPORT	ME	4
2634836	6	5608	FREEPORT DEMOCRATIC COMMITTEE	42978					83 RINGROSE ROAD		FREEPORT	ME	4
2646491	6	5608	FREEPORT DEMOCRATIC COMMITTEE	42978					83 RINGROSE ROAD		FREEPORT	ME	4

Using exOrgID 5608, the expenditure would be entered as it exists in the system (screen shot is from the Contributor/Payee table).

Edit Contributor/Payee

Organization Name  
FREEPORT DEMOCRATIC COMMITTEE

Address Line 100  
27 SOUTH ST.

Address Line 2

City  
FREEPORT

State  
ME

Zip Code  
04032-

External Reference Id  
42978

Enter a valid Zip Code

5. Going forward, do not import a file then Import another file on top of it. If you don't want to use the imported file, you need to reject the file. Because there is a bug in the system (see Next Steps below), I know you tried to reject but the Reject function was not working

#### Next Steps:

- A. Accept the file – Everything except the 37 Errors will be imported. You will need to manually fix those errors or create another without the contributions already imported. To fix the warnings, you need to either make the Contributor/Payee table match the file OR make the file match the Contributor/Payee table.
- B. Wait until the system vendor gets the file rejected then re-import a corrected file.

Please reach out with any questions and let me know as soon as possible how you plan to proceed.

Heidi

Heidi Hoefler, Esq.  
Political Committee & Lobbyist Registrar  
Maine Ethics Commission  
207.287.4709 (phone)

**From:** Hoefler, Heidi  
**Sent:** Friday, July 18, 2025 3:35 PM  
**To:** [REDACTED]  
**Subject:** RE: ActBlue Campaign Finance Report -- Import Manager Function

Hi [REDACTED],

As discussed, I escalated this to the system vendor. They just got back to us. There are myriad issues with the upload, including that it does not follow the template. I will try to distill the information and send it to you later today or as soon as possible on Monday. We may then need to set up some time to talk through it. In the meantime, please do not try to import or upload any files.

Heidi

Heidi Hoefler, Esq.  
Political Committee & Lobbyist Registrar  
Maine Ethics Commission  
207.287.4709 (phone)

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**From:** Hoefler, Heidi  
**Sent:** Thursday, July 17, 2025 12:08 PM  
**To:** [REDACTED]  
**Subject:** RE: ActBlue Campaign Finance Report -- Import Manager Function

Hi [REDACTED],

I am going to escalate this to the system vendor. Stay tuned for next steps.

Heidi

Heidi Hoefler, Esq.  
Political Committee & Lobbyist Registrar  
Maine Ethics Commission  
207.287.4709 (phone)

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**From:** [REDACTED]  
**Sent:** Thursday, July 17, 2025 12:03 PM  
**To:** Hoefler, Heidi <[Heidi.Hoefler@maine.gov](mailto:Heidi.Hoefler@maine.gov)>  
**Subject:** Re: ActBlue Campaign Finance Report -- Returned Your Call

**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!

I tried uploading it again, and am getting the same errors for those entries on the expenditures tab, and also I'm getting new errors of duplicate ID's so it's not creating new records. The system is not letting me Reject them even when I click on it. Is there a way to remove it from the back end, and also is there a way I can get those expenditure orgid's to work? I double checked them against the table from the Maine website. I'm attaching the file, in case that is helpful!

Thanks so much!

[REDACTED]

On Thu, Jul 17, 2025 at 11:16 AM Hoefler, Heidi <[Heidi.Hoefler@maine.gov](mailto:Heidi.Hoefler@maine.gov)> wrote:

Hi [REDACTED],

Sorry you are once again experiencing tech issues. I called you back – no answer and the voice mail box is full so I could not leave a message. Please e-mail to me the file you are trying to upload and let me know what issues you are having so we can troubleshoot. Screen shots of where you get stuck and any error messages you see would be helpful, too.

Heidi

Heidi Hoefler, Esq.  
Political Committee & Lobbyist Registrar  
Maine Ethics Commission  
135 State House Station | Augusta, ME 04333  
207.287.4709 (phone) | 207.287.6775 (fax)

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Have any questions? Visit <https://actblue.atlassian.net/servicedesk/customer/portals>

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

Committee Name	Requested Waivers of Late-Filing Penalties	Preliminary Penalty	Final Penalty	Commission Meeting Date
<b>Waiver Requests</b>				
Maine United Auto Workers PAC	Late January Quarterly	\$400.00	\$400.00	4/25/2018
Maine Health Care Assoc. PAC	Late 24-Hour Report	\$2,760.00	\$500.00	8/29/2018
Fecteau Leadership PAC	Late 24-Hour Report	\$400.00	\$400.00	8/29/2018
New Mainers PAC	Late 24-Hour Report	\$10,000.00	\$1,000.00	3/6/2019
Senate Democratic Campaign Committee	Late January Quarterly	\$1,010.50	\$750.00	4/24/2019
Unite Portland PAC ( <i>Municipal</i> )	Late IE Report	\$5,000.00	\$1,250.00	12/18/2019
Unite Portland PAC ( <i>Municipal</i> )	Late IE Report	\$2,052.16	\$750.00	12/18/2019
Women's Leadership Fund PAC	Late IE Report	\$100.00	\$50.00	8/11/2020
Maine Truck PAC	Late 24-Hour Report	\$2,203.08	\$500.00	10/16/2020
Revive Hometown Maine PAC	Late October Quarterly	\$510.00	\$250.00	10/30/2020
Mainers for Health and Parental Rights	Late 24-Hour Report	\$980.00	\$750.00	1/27/2021
Kittery Democratic Committee	Late 11-Day Pre-General Report	\$500.00	\$100.00	2/24/2021
Madison Republican Committee of Maine	Late 11-Day Pre-General Report	\$500.00	\$100.00	2/24/2021
York Town Republican Committee	Late 11-Day Pre-General Report	\$500.00	\$100.00	2/24/2021
Energy PAC for Maine	Late 24-Hour Report	\$8,840.00	\$750.00	3/31/2021
Protect Maine Elections	Late Initial Report	\$1,004.00	\$750.00	10/29/2021
Mainers for Local Power PAC	Late 24-Hour Report	\$300,000.00	\$25,000.00	2/28/2022
Mainers for Local Power PAC	Late 24-Hour Report	\$98,500.00	\$10,000.00	2/28/2022
No on 3: Right to Food is Wrong for Maine	Late 24-Hour Report (3)	\$932.00	\$300.00	2/28/2022
Piscataquis County Republican Committee	Late January Semiannual Report	\$500.00	\$100.00	3/30/2022
Waldo County Democratic Committee	2022 July Semiannual Report	\$181.21	\$60.40	9/28/2022
Lincoln County Republican Committee	2022 July Semiannual Report	\$500.00	\$100.00	9/28/2022
American Leadership Committee-Maine PAC	Late IE report Oct. Quarterly Report	\$679.88	\$679.88	11/30/2022
Planned Parenthood Maine Action Fund	Late IE report	\$2,433.60	\$750.00	11/30/2022
We the People PAC	Late IE report	\$5,000.00	\$1,000.00	11/30/2022
We the People PAC	Late IE report	\$99.96	\$99.96	11/30/2022
Steve LaFreniere	Late IE Report	\$1,090.00	\$200.00	12/21/2022
York Voter Alliance	Late IE report	\$672.61	\$200.00	12/21/2022
Androscoggin County Democratic Committee	Late 11-Day Pre-General Report	\$99.94	\$99.94	12/21/2022
Aroostook County Republican Committee	Late 11-Day Pre-General Report	\$500.00	\$100.00	1/30/2023
Aroostook County Republican Committee	Late 24-Hour Report	\$120.00	\$120.00	1/30/2023
Maine AFL-CIO Committee on Political Education PAC	Late 24-Hour Report	\$4,860.00	\$750.00	2/28/2023
Maine United Auto Workers Council PAC	Two Late 24-Hour Reports	\$4,900.00	\$1,000.00	2/28/2023
American Leadership Committee-Maine PAC	Late 42-Day Post-General Report	\$55,654.00	\$2,500.00	5/31/2023
We the People PAC	Late 11 day Pre-special election report	\$1,147.50	\$400.00	8/23/2023
Star City PAC	Late 11 day Pre-special election report	\$370.50	\$150.00	8/23/2023

Citizens for a Bright Future	Late Registration, late filing	\$3,866.00	\$250.00	5/29/2024
Citizens for a Bright Future	Missing Disclaimers on signs		\$50.00	5/29/2024
Planned Parenthood Maine Action Fund	Late IE Report	\$733.60	\$400.00	5/29/2024
Bangor Fire Fighters PAC Fund	Late to update their registration	\$250.00	\$0.00	5/29/2024
Maine Republican Party	2 Late 24-Hour Reports	\$38,839.80	\$3,000.00	9/25/2024
Friends of Maine Hospitals PAC	Late 24-Hour Report	\$900.00	\$500.00	9/25/2024
Local 349 PAC Fund	Substantially non-compliant 42-Day Post-Primary Report	\$1,369.00	\$500.00	9/25/2024
Maine Labor Climate PAC	Late 60-Day Pre-General IE Report	\$534.44	\$400.00	9/25/2024
Bright Future Maine PAC	Late 2-Day Pre-Primary IE	\$6,411.30	\$375.00	9/25/2024
Democrats of Kennebunk, Kennebunkport and 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
<b>Late Major Contributor Decisions</b>				
<b>Committee Name</b>	<b>Violation</b>	<b>Preliminary Penalty</b>	<b>Final Penalty</b>	<b>Commission Meeting Date</b>
<b>Waiver requests</b>				
Mainers for Local Power PAC	Late Major Contributor (2)	\$53,431.15	\$2,500.00	3/10/2020
Maine Street Solutions - Protect Schools BQC	Late Major Contributor	\$25,000.00	\$2,000.00	5/27/2020
Clean Energy Matters PAC	Late Major Contributor Notice	\$50,000.00	\$2,500.00	3/31/2021
We the People PAC	Late Major Contributor Notice	\$11,500.00	\$2,500.00	5/26/2021
Mainers for Local Power PAC	Late Major Contributor Notice	\$13,786.32	\$2,500.00	8/23/2021
Maine Energy Progress	Late Major Contributor Notice	\$25,768.87	\$3,000.00	11/29/2023
Dorman Products	Late Major Contributor Report	\$15,000.00	\$5,000.00	11/29/2023
Maine Automotive Right to Repair	Late Major Contributor Notices (6)	\$240,000.00	\$35,000.00	11/29/2023
Genuine Parts Company	Late Major Contributor Report	\$50,000.00	\$5,000.00	1/31/2024
Our Power	Two Late Major Contributor Notices	\$28,155.08	\$6,000.00	2/27/2024
<b>Other Enforcement Decisions</b>				
<b>Committee Name</b>	<b>Violation</b>	<b>Preliminary Penalty</b>	<b>Final Penalty</b>	<b>Commission Meeting Date</b>
<b>Other Violations</b>				
Sara Gideon Leadership PAC	Contributions Made in Name of Another		\$500.00	10/30/2019
Working Families PAC	Failure to file 2020 October Quarterly; 11-Day Pre-General, 42-Day Post-General, and 2021 January Quarterly and April Quarterly campaign finance reports		\$3,750.00	5/26/2021
Mainers for Fair Laws BQC	Missing Disclaimers in television ads		\$2,500.00	9/29/2021
Working Families PAC	Over the limit contribution to Diane Russell senate campaign		\$285.00	9/29/2021
American Leadership Committee-Maine PAC	Missing top three donors		\$10,000.00	11/30/2022
Building the Maine House	Late 11-day Pre-Primary Report		\$0.00	7/24/2024



Jake Ducharme	Missing Disclosures on Saviello signs		\$0.00	10/30/2024
Cape Says Yes to S	Missing Disclosure on advertisement		\$0.00	10/30/2024
Cape Elizabeth School Referendum	Missing Disclosure on advertisement		\$0.00	10/30/2024
Yes on 1/Freeport	Missing Disclosures on mailer		\$50.00	10/30/2024
Auburn Democratic City Committee	Missing Disclosure on advertisement		\$0.00	10/30/2024
Maine Senate Republican PAC	making an over-the-limit contribution		\$1,000.00	1/29/2025
Maine Senate Republican PAC	making a material false statement		\$0.00	1/29/2025
Senate Democratic Campaign Committee	inaccurate attribution & payment		\$159.50	1/29/2025

## **Late Filing of Committee July Quarterly Campaign Finance Report – ActBlue Maine Applicable Law**

### **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. ...

**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 30<sup>th</sup>.

...

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

...

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

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

**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.

...