



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

To: Commissioners
From: Jonathan Wayne, Executive Director
Date: April 28, 2026
Re: Maine Democratic Party's Disclosure of Activities to Oppose 2025 Question 1

Summary

The state committees of Maine's political parties are required to file quarterly campaign finance reports with the Commission. If a state party committee receives contributions or makes expenditures for the purpose of influencing a ballot question, it is required to file additional reports 11-days before and 42 days after the ballot question election, and potentially 24-Hour Reports if the committee received contributions of \$5,000 or more or made expenditures of \$1,000 or more during the last 13 days before the election.

In the late summer and fall of 2025, the Maine Democratic Party (MDP) received and spent money for the purpose of opposing Question 1 on the November 4, 2025 ballot, which was a citizen initiative to restrict absentee voting. The MDP received \$250,000 in contributions to oppose Question 1 and spent around \$173,000 against the initiative by hiring additional staff to canvass door-to-door and engage in volunteer and community organizing, and by paying for online advertising, printed literature, and apparel and buttons.

In 2025, the MDP filed quarterly campaign finance reports, but did not file the reports due 11-days before and 42 days after the November 4th election. It also did not file three 24-Hour Reports that were due one day after receiving a \$10,000 contribution and making two \$10,000 expenditures during the last 13 days before the election. (In this memo, these reports are referred to as the "additional reports.") The MDP explains it didn't file the additional reports because it relied on the list of assigned reports in the Commission's eFiling system and communications from Commission staff to tell them when their next filings were due. In 2025, the Commission staff did not assign the additional reports to the MDP in our former eFiling system because we did not know that the MDP would be opposing Question 1, which is outside the norm for the

state political parties. The Commission staff tries to anticipate most of the needs of most of our filers, but, ultimately, it is *each filer's* responsibility to confirm which reports it needs to file.

Also, while the MDP's quarterly campaign finance reports included the committee's transactions that were related to Question 1, the MDP did not mark these expenditures as opposing Question 1. Consequently, members of the public in fall 2025 had no way of knowing that the MDP was spending money to oppose Question 1 or how much. MDP states it didn't realize this was necessary and provides further explanation, discussed below.

One important piece of context in this enforcement matter is that party committees are formed to influence candidate elections but get involved in ballot question elections *only occasionally*. As a consequence, (1) MDP staff did not understand that additional reports were due and that the party needed to mark its expenditures opposing Question 1, (2) communications between MDP staff and Commission staff in 2025 were not as effective as they could have been, and (3) the MDP's vendor who formats the party's transaction data to be uploaded electronically to the Commission's former eFiling system may not have understood how to label particular expenditures as opposing a ballot question. The Commission staff acknowledges another consequence: its 2025 filing schedule for state party committees did not mention the additional reports (which is an error we will avoid in the future) but it is unclear whether the MDP actually relied on that particular document to determine which reports were due.

Some monetary penalties should be assessed for not filing the five additional campaign finance reports in October-December 2025. Four of these reports were due *before* the Nov. 4 election and would have provided Maine voters with more up-to-date information concerning who was spending money to influence their votes. The Commission staff does not doubt the good faith of the MDP staffer who filed the party's reports but believes the MDP should have been more proactive by confirming which reports were due, requiring its vendor to mark those expenditures that opposed Question 1, or by amending those transactions by hand after the bulk upload. Staff now recommends late-filing penalties totaling \$9,000, which reflects a reduction after reading the MDP's March 18, 2026 letter. We recognize the Commission may want to assess lower or higher penalties. The staff's proposed findings of violation and penalties are listed in the last section of this memo. We suggest concluding this matter on May 6. Any additional investigation would yield diminishing returns. The MDP is prepared to amend its reports to mark those expenditures that opposed Question 1.

Chronology of Enforcement Matter

- On November 19, 2025, the Commission received a complaint from Mr. Alex Titcomb, a campaign manager in support of Question 1. He alleged that the MDP should have filed campaign finance reports as a “ballot question committee” pursuant to statutes that apply generally to organizations spending money to influence ballot questions.
- On December 19, 2025, the MDP responded to the complaint.
- At its January 28, 2025 meeting, the Commission authorized the staff to investigate and requested a memo from its counsel, Assistant Attorney General Jonathan R. Bolton, concerning state party committees’ responsibilities to disclose their financial activities supporting or opposing ballot questions.
- At the February 25, 2026 meeting, the Commission accepted the advice from AAG Bolton that party committees generally should report ballot question-related activity in their regular campaign finance reports filed as state party committees under 21-A M.R.S. § 1017-A.
- On March 3, 2026, the Commission staff sent a notice of proposed late-filing penalties. ETH 1-4. On March 18, 2026, the MDP’s counsel provided a letter requesting a waiver of any late-filing penalties. ETH 5-11.
- On April 16, 2026, the MDP’s counsel answered a couple investigative questions in a reply email. ETH 12-13.

Legal Requirements (ETH 14-19)

Campaign finance reporting by party committees. Party committees are required to submit campaign finance reports to the Commission pursuant to 21-A M.R.S. § 1017-A, unless they are exempt because they had less than \$1,500 in financial activity during a calendar year. The required contents of the reports are set out in § 1017-A(1)-(3). Among other things, subsection 2 states that “[a] party committee shall report all expenditures made to influence a campaign, as defined in section 1052, subsection 1.” (underlining and italics added for emphasis). The term “campaign” is defined in 21-A M.R.S. § 1052(1) to refer to both candidate and ballot question elections.

Filing schedule in candidate election years. The filing schedule for state party committees is set out in § 1017-A(4-A). Each year they are required to file four quarterly campaign finance reports. § 1017-A(4-A)(A). During years with primary and general candidate elections, party committees must also file reports 11 days before and 42 days after the primary and general elections. § 1017-A(4-A)(B).

Filing schedule in other years. In odd-numbered years, *if* a state party committee has received contributions or made expenditures for the purpose of influencing a ballot question election, a special election, or a municipal election, the state party committee must file reports 11 days before and 42 days after that election. § 1017-A(4-A)(C). The committee would also have to file 24-Hour Reports during the last 13 days before the election if they have transactions over certain thresholds to influence the ballot question. § 1017-A(4-A)(E). The full § 1017-A(4-A) that sets out the filing schedule for state party committees is as follows:

4-A. Filing schedule. A state party committee shall file its reports according to the following schedule. All reports required under [paragraphs A, B and C](#) must be filed by 11:59 p.m. on the day of the filing deadline.

A. A state party committee shall file quarterly reports:

- (1) On January 15th, which must be complete up to December 31st;
- (2) On April 10th, which must be complete up to March 31st;
- (3) On July 15th, which must be complete up to June 30th; and
- (4) On October 5th, which must be complete up to September 30th.

B. During any year in which primary and general elections are held, a state party committee shall file primary and general election reports in addition to the reports required under [paragraph A](#):

- (1) On the 11th day before the date on which the election is held, which must be complete up to the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held, which must be complete up to the 35th day after that date.

C. In an election year other than a year described in paragraph B, if a state party committee has received contributions or made expenditures for the purpose of influencing a ballot question election, a special election or a municipal candidate or referendum election subject to Title 30-A, section 2502, the committee shall file preelection and post-election reports:

- (1) On the 11th day before the date on which the election is held, which must be complete up to the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held, which must be complete up to the 35th day after that date.

D. A state party committee that files an election report under paragraph B or C is not required to file a quarterly report under paragraph A when the deadline for that quarterly report falls within 10 days of the filing deadline established in paragraph B or C.

E. If a state party committee is required to file a report 11 days before an election pursuant to paragraph B or C, the committee shall report any single contribution of \$5,000 or more received or any single expenditure of \$1,000 or more made after the 14th day before the election and more than 24 hours before 5:00 p.m. on the day of the election within 24 hours of that contribution or expenditure. The committee is not required to include in this report expenditures for overhead expenses or compensation paid to an employee or other member of the campaign staff who has received payments at regular intervals that have been disclosed in previously filed campaign finance reports. As used in this paragraph, "overhead expenses" includes, but is not limited to, rent, utility payments, taxes, insurance premiums or similar administrative expenses.

(underlining added for emphasis)

Waiver process for late-filing penalties. If the Commission staff preliminarily finds that a candidate or party committee has filed a campaign finance report late, the Commission staff is directed to send a notice of preliminary penalties to the late filer. 21-A M.R.S. § 1020-A(6). The late filer may then request a determination of the penalties by the Commission. *Id.* The Commission is authorized to grant a full or partial waiver due to mitigating factors. § 1020-A(2).

Summary of Results of Commission Staff's Investigation

Commission staff request: identify contributions received by the MDP to influence Question 1.

Summary of Maine Democratic Party response: In non-election years, state party committees often raise money for a variety of purposes, making it difficult to precisely determine why a donor contributed. The party states it received a total of \$250,000 for the purpose of opposing Question 1:

7/1/2025	Elizabeth Delucia-Harting, Brooklyn, NY	\$15,000
8/5/2025	Democratic Governors' Association – Maine, Washington DC	\$50,000
8/14/2025	Democratic Governors' Association – Maine, Washington DC	\$20,000
9/30/2025	Sea Coast Management Company, Falmouth, ME	\$30,000
10/3/2025	Democratic Governors' Association – Maine, Washington DC	\$80,000
10/15/2025	Sea Coast Management Company, Falmouth, ME	\$30,000
10/16/2025	Laura Gottsman, San Carlos, CA	\$10,000
10/19/2025	Joan Maxwell, Washington, DC	\$5,000
10/29/2025	Nancy Zweng, Carmel, CA	\$10,000
	Total	\$250,000

Commission staff request: identify expenditures by the Maine Democratic Party to influence Question 1.

Summary of Maine Democratic Party response: In its investigative response, the MDP identified its expenditures that opposed Question 1. The party is willing to amend its campaign finance reports to designate those expenditures that opposed Question 1. Based on the specific expenditures identified, the Commission staff calculated totals of the party’s expenditures to oppose Question 1:

Staff Expenditures to Oppose Question 1	Non-Staff Expenditures to Oppose Question 1	Total Spent to Oppose Question 1
\$120,105.48	\$53,750.00	\$173,855.48

Staff expenditures. The party described its expenditures to oppose Question 1 as “largely for staff time for people who worked on several projects, including Question 1.” The party says it paid seven workers whose work included activities opposing Question 1, such as participating in educational events and canvassing. The party compensated these workers, reimbursed them for their travel, and incurred costs for health insurance and union dues in connection with these workers. These staff members also engaged in non-Question 1 projects such as general party building, candidate recruitment, non-Question 1 communications, and volunteer recruitment for the party.

Specific staff payees. During 2025, the Maine Democratic Party made ongoing payroll and travel expenditures to seven individuals: Emily Gerencer, Jay Bowie, Hollie Watts, Natalie Dix, Kira Skjoldborg, John Baxter, and Benjamin Costa. The party also made a total of seven payments to Anthem Blue Cross, Northeast Delta Dental, and IBEW Local 1837 related to employing these individuals. In addition, the party made three payments to Anne Merkel and one payment to Sara Axson to oppose Question 1.

Non-staff expenditures. The Maine Democratic Party identified five expenditures to oppose Question 1 for purposes unrelated to staff.

Date	Payee	City, State	Purpose	Amount¹
8/18/2025	Resonance Campaigns	Washington, DC	Printing expenses	\$7,000
9/9/2025	Resonance Campaigns	Washington, DC	Printing expense	\$11,000
10/20/2025	Resonance Campaigns	Washington, DC	Printing - Literature	\$15,750
10/29/2025	Frame Media Strategies LLC	Portland, ME	Media Consulting	\$10,000
10/30/2025	Frame Media Strategies LLC	Portland	Media Consulting	\$10,000
			Total (by staff)	\$53,750

Commission staff request: please provide information relevant to why the Maine Democratic Party didn't file Campaign Finance Reports 11 Days before and 42 Days after the November 4, 2025 election.

Full Maine Democratic Party response: MDP did not file these reports because they did not appear as required (or optional) reports in the campaign finance system. Filers often rely on the filing system itself to alert for additional reports, late filing and/or missing information on filing drafts. MDP assumed that if the report wasn't listed in the filing system, it was not required.

¹ This chart and the totals in this memo exclude a September 30, 2025 payment of \$93.70 to Staples – Corporate for office supplies. The information from the Maine Democratic Party was ambiguous whether the expenditure was made to oppose Question 1. Staff assumes this ambiguity will be resolved in any amendment to the party's October quarterly report after this enforcement proceeding ends.

It is possible that additional filings do not automatically appear in the filing system without some back end intervention by commission staff (such as with special election reports) but MDP was not (and is not) aware that the additional filings for ballot question work only appear if turned on by staff.

**the recollection of staff is that these reports were not available for filing within the system – we haven't been able to access the old system to confirm this information*

Other Information provided by the MDP

The party states that:

- The MDP purchased buttons and stickers opposing Question 1. When replying on 4/16/2026 to a follow-up investigative email from Commission staff, MDP's counsel stated the cost of producing the stickers was \$1,437.08, which the party is happy to add to its campaign finance reporting to the Commission. The MDP stated it received no revenue from selling buttons and stickers.
- The MDP reported sales revenue for items purchased online in the party's federal campaign finance reports. Commission staff assume this refers to apparel.
- The MDP held several volunteer phone banks. It did not incur any expenditures in connection with those events.
- The MDP also held a phone bank specifically for getting-out-the-vote. In the MDP's first investigative response, it stated costs related to that phone bank were reported on MDP's federal campaign finance report. When replying on 4/16/2026 to an email from staff inquiring whether phone costs should have been reported on *state* campaign finance reports, the MDP replied "there were no reportable costs for the phone banks."
- The MDP did not make expenditures for graphic design services.

Five Reports Not Filed

Because the MDP received contributions and made expenditures for the purpose of influencing Question 1 on the November 4, 2025 ballot, the Commission staff has found preliminarily that the MDP was required to file five additional reports under 21-A M.R.S. § 1017-A(4-A)(C)&(E) (see underlined language on pages 4 and 5):

Five Unfiled Campaign Finance Reports (Election was on the November 4, 2025)				
Report	Deadline	Report Period	Transaction(s)	Days late
11-Day Pre-Election	10/24/2026	10/1/2026-10/21/2026	All transactions during the report period	83
24-Hour	10/30/2026		\$10,000 Contribution from Nancy Zweng	78
24-Hour	10/30/2026		\$10,000 Expenditure to Frame Media Strategies	77
24-Hour	10/31/2026		\$10,000 Expenditure to Frame Media Strategies	77
42-Day Post-Election	12/16/2026	10/22/2026-12/9/2026	All transactions during the report period	30

Because these reports were not filed, no information about the party’s financial activities during Oct. 1 - Nov. 4, 2025 to oppose Question 1 was available to the public until *after the November 4* election. The information became available on January 15, 2026, when the MDP filed its January Quarterly report. The Commission staff is regarding the above five reports 30-83 days late (the number of days between each report deadline and when the financial activity was disclosed on Jan. 15, 2026).

Recommended Penalties

Based on the formula in 21-A M.R.S. § 1020-A(4-A), the Commission staff has calculated preliminary late-filing penalties for the five reports and sent a March 3, 2026 notice of penalties to the MDP. ETH 1-4. Due to the considerations discussed in the remaining part of this memo, the Commission staff recommends the penalties in the column on the right:

Report	Deadline	Days late	Per-centage	Expenditures for Period Reported Late	Preliminary Penalty	Maximum	Staff Recommends Waiver to
11-Day Pre-Election	10/24/2025	83	2%	\$113,550.61	\$188,494.01	\$188,494.01	\$2,500.00
24-Hour	10/30/2025	78	2%	\$10,000.00	\$15,400.00	\$5,000.00	\$1,500.00
24-Hour	10/30/2025	78	2%	\$10,000.00	\$15,400.00	\$5,000.00	\$1,500.00
24-Hour	10/31/2025	77	2%	\$10,000.00	\$15,400.00	\$5,000.00	\$1,500.00
42-Day Post-Election	12/16/2026	30	2%	\$178,746.17	\$107,247.70	\$107,247.70	\$2,000.00
Totals						\$310,741.71	\$9,000.00

While the recommended penalties are significantly smaller than the maximum penalties for the late reports, the recommended penalties are somewhat higher than many assessed by the Commission since April 2018. ETH 20-22.

MDP's March 18, 2026 Request for a Waiver of Late-Filing Penalties (ETH 5-11)

MDP's counsel submitted a March 18, 2026 response to the penalties proposed by staff that explains the MDP's 2025 campaign finance reporting and argues for lower penalties. Commission staff addresses the MDP's points about the Commission's former eFiling system in a section below.

Failure to file additional reports. The MDP's counsel explains that during 2025 the MDP filed only the four quarterly campaign finance reports because it relied on the list of reports assigned to the MDP in the Commission's former eFiling website and because any communications that the MDP received directly from Commission staff did not mention the additional reports. MDP's counsel states "virtually all [campaign finance] filers rely on the [Commission's eFiling] system itself and communications from the staff to tell them when their next filing is due."

The Commission's former eFiling system was designed so that Commission staff could assign additional reports to a state party committee if staff is aware that the party committee was spending money to influence a ballot question. Because state party committees spend money to influence ballot questions only occasionally, in 2025 the Commission staff did not initiate any inquiries with the MDP about possible ballot question spending. The relevant Commission employee works at a very rapid pace responding by email or phone to the immediate needs of hundreds of lobbyists and committee filers. If a specific filer engages in campaign activities that are unusual for that type of filer, we need to hear from the filer directly to advise them about any unusual reports that might be due.

Failure to mark expenditures as opposing Question 1. The MDP provided its transactional information to an outside vendor, which modified the data into a very specific format required by the Commission's eFiling system so that the data could be electronically uploaded in bulk to the system, rather than typed in by hand. The MDP explains that in 2025 it did not mark its expenditures as opposing Question 1 due to a series of seemingly small mistakes which supported MDP's belief that it was filing correctly. It says that in odd-numbered years it enters its expenditures in Schedule B-1 for operating expenditures and that schedule does not contain a drop-down menu to indicate whether an expenditure supports or opposes a ballot question.

Proportionality of penalties. The MDP characterizes the proposed penalties as excessively high and out of proportion to the party's actions. The MDP states that while it may be a sophisticated filer, influencing ballot questions is outside the norm for the MDP. The MDP simply didn't know that extra reports were required and all signs and contact with the Commission's eFiling system reinforced that understanding. All of the information related to Question 1 was reported. Any member of the public who was interfacing with the MDP clearly knew that the party was engaging in opposition to Question 1. It is fair for the Commission to consider that MDP's counsel mentioned that the MDP would be filing its activity "in our regular reports" in the context of a substantial Sept. 26, 2025 email exchange with Commission staff.

Points by Commission Staff on Former Efiling System

Reliance on list of required reports in the Commission's former eFiling website.

The party's explanation that it relied on the list of assigned quarterly reports in the Commission's former eFiling system is a relevant point that should be given some weight as a mitigating factor, but Commission staff responds the MDP should have gone farther. It is each candidates' and committee's responsibility to figure out which campaign finance reports are due, particularly if the filer is engaging in election activities that are outside the norm for that filer. Compared to most PACs and ballot question committees, the Maine Democratic Party has more personnel available to figure this out.

Commission staff does not doubt the good faith of the MDP staff member who was filing campaign finance reports for the MDP in 2025 but believes it was an incomplete effort to rely primarily on the list of assigned reports listed in the Commission's former eFiling website to understand which campaign finance reports are due. There are all sorts of *conditional* reports that a high-spending, multipurpose political organization like the MDP may have to file, depending on what kind of spending it is conducting, for example, Independent Expenditure Reports, 24-Hour Reports, and additional reports required for a ballot question or special candidate elections. There's a limit to how much educational information can be displayed in a few square inches on the screen of a personal computer or mobile device, especially when a campaign finance filer is engaging in election activities that are outside the norm. That is why the Commission staff tries to be helpful on the phone, anticipate issues when sending reminder emails to filers, and

publishes filing schedules and guidebooks. We think that, after the MDP decided it would oppose Question 1, it should have looked beyond the list of assigned reports in confirming which reports were due in 2025.

The design of the Commission's new eFiling system that is being rolled out this spring will be different. The Commission is still receiving functionality from its new vendor but we expect campaign finance filers will be able to assign the additional reports for ballot questions for themselves, without relying on any action by the Commission staff. We will strive to make the new system as helpful as possible to filers, but campaign finance filers will still need to make an effort to understand what reports are due.

Ability to Designate Expenditures as Opposing a Ballot Question. The MDP explains it didn't mark its expenditures opposing Question 1 because its expenditures were uploaded into Schedule B-1 for operating expenses, which didn't provide a dropdown box. Commission staff doesn't understand this point. We believe the MDP could have designated which expenditures opposed Question 1 in its quarterly reports in two ways:

- (1) The Commission's former eFiling website contained written instructions for how filers (or their consultants) should format the filer's transactional data to be uploaded in bulk successfully. ETH 125-164. Data is uploaded in a single file with multiple sections. One section covers all Expenditures to be uploaded. ETH-131. The filer/consultant makes sure the details of each expenditure are correctly entered in different fields (*exDate*, *exAmount*, *exPurpose*, *etc.*). ETH 138-141. If a filer is making particular expenditures to support or oppose a ballot question, the filer should enter a Y in the field labeled *exSuppOppBQ*. ETH 140-141. The filer must then provide some supplemental information by completing another section for Associated Ballot Questions. ETH-131, 145. In that additional section, the filer marks those expenditures as supporting or opposing specific ballot questions. ETH-145. This is all spelled out in the written instructions that were accessible to the MDP's consultant. ETH 125-164.
- (2) After expenditures are uploaded to the Commission system, they can be amended by hand, including by marking individual expenditures as supporting or opposing ballot questions. There was no obstacle (that we know of) due to any labeling as "operating expenses."

Staff Recommendations

The Commission staff recommends making the following findings of violation and assessing the following penalties:

Findings of Violation (ETH 14-15)

- *finding* that the Maine Democratic Party violated 21-A M.R.S. § 1017-A(4-A)(B)(1) by not filing an **11-day pre-election report** by October 24, 2025,
- *finding* that the Maine Democratic Party violated 21-A M.R.S. § 1017-A(4-A)(B)(2) by not filing a **42-day post-election report** by December 16, 2025, and
- *finding* that the Maine Democratic Party violated 21-A M.R.S. § 1017-A(4-A)(E) by not filing **three 24-Hour Reports** by October 30 and 31, 2025 for
 - a contribution of \$10,000 received from Nancy Zweng on October 29, 2025,
 - an expenditure of \$10,000 made to Frame Media Strategies on October 29, 2025, and
 - an expenditure of \$10,000 made to Frame Media Strategies on October 30, 2025.

Assessment of Penalties Totaling \$9,000 pursuant to 21-A M.R.S. § 1020-A(2),(4-A) & (6) (ETH 17-18)

- *assessing a penalty* of \$2,500 for the late **11-day pre-election report**,
- *assessing a penalty* of \$2,000 for the late **42-day post-election report**, and
- *assessing three penalties of \$1,500* for the three late **24-Hour Reports**.

Written Materials for this Agenda Item	
3/3/2026 Staff notice of proposed violations and late-filing penalties	ETH 1-4
3/18/2026 Maine Democratic Party response to proposed penalties	ETH 5-11
4/16/2026 Email from Maine Democratic Party	ETH 12-13
Applicable law: 21-A M.R.S. §§ 1017-A, 1020-A	ETH 14-19
Commission Decisions on Penalties against Political Committees	ETH 20-22
October 2025 quarterly report by Maine Democratic Party	ETH 23-39
January 2026 quarterly report by Maine Democratic Party	ETH 40-54
<i>Materials from January 28, 2026 meeting</i>	
11/19/2026 Complaint by Alex Titcomb	ETH 55-66
12/19/2025 Maine Democratic Party's response to complaint	ETH 67-72
12/26/2025 Follow-up letter by Alex Titcomb	ETH 73-74
1/20/2026 Staff memo to Commission	ETH 75-84
1/27/2026 Supplemental response by Maine Democratic Party	ETH 85-107
1/28/2026 Meeting remarks by Alex Titcomb	ETH 108-109
<i>Materials from February 25, 2026 meeting</i>	
2/18/2026 Memo by Assistant Attorney General Jonathan R. Bolton	ETH 110-118
2/23/2026 Response by Alex Titcomb to Mr. Bolton's Memo	ETH 119-124
<i>Other</i>	
Specifications for bulk upload in Commission's former eFiling website	ETH 125-164



STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS
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March 3, 2026

By Email

Kate Knox, Esq.
Lisa Prosienski, Esq.
Bernstein Shur
100 Middle Street
Portland, ME 04104

Dear Counsel,

Thank you for the information provided by the Maine Democratic Party concerning the party's activities to oppose Question 1 in 2025. This letter is to notify the party of the staff's intended recommendations for the Commission at its March 25, 2026 meeting and to provide the party with an opportunity to respond by March 17, 2026.

Recommended Findings of Violation

Late campaign finance reports

To cover the second half of 2025, the Maine Democratic Party filed two quarterly reports on October 6, 2025 and January 15, 2026. Based on information provided by the party, the Commission staff has preliminarily found that the party violated Maine Election Law by failing to file four additional campaign finance reports:

- The Maine Democratic Party violated 21-A M.R.S. § 1017-A(4-A)(B)(1) by not filing an 11-day pre-election report by October 24, 2025 that would have covered the period of October 1-21, 2025;
- The Maine Democratic Party violated 21-A M.R.S. § 1017-A(4-A)(E) by not filing a 24-Hour Report by October 30, 2025 for an October 29, 2025 expenditure of \$10,000 to Frame Media Consulting;
- The Maine Democratic Party violated 21-A M.R.S. § 1017-A(4-A)(E) by not filing a 24-Hour Report by October 31, 2025 for an October 30, 2025 expenditure of \$10,000 to Frame Media Consulting; and
- The Maine Democratic Party violated 21-A M.R.S. § 1017-A(4-A)(B)(2) by not filing a 42-day post-election report by December 16, 2025 that would have covered the period of October 22 - December 9, 2025;

Late filing penalties for these violations are discussed below.

Failure to Designate Expenditures that Opposed Question 1

At the Commission’s March 25, 2026 meeting, the Commission staff will recommend a finding that the Maine Democratic Party also violated 21-A M.R.S. § 1017-A(2) by failing to designate which expenditures opposed Question 1 in the party’s October and January quarterly reports.

Commission staff believes the Maine Democratic Party could have designated which expenditures opposed Question 1 in three ways: (1) during the bulk upload process as described¹ in the Commission staff’s January 29, 2026 correspondence to the party; (2) through amending the transactions after the bulk upload; and (3) in the explanation of purpose text field which is shown as the Remarks column in campaign finance reports.

The Commission staff intends not to recommend any penalty for violating 21-A M.R.S. 1017-A(2) by failing to designate which expenditures opposed Question 1, for two reasons. First, we believe the preliminary late-filing penalties totaling \$305,741.71 discussed in the next section are more than sufficient to encourage greater care in the future. Second, a penalty for filing an incomplete report is authorized only if the Commission determines that the report was not timely filed because it did not “substantially conform” to the disclosure requirements. 21-A M.R.S. 1020-A(2). For purposes of efficiency, we would rather skip a debate on whether the party’s quarterly reports substantially conformed.

Recommended Penalties for Four Late-Filed Reports

Based on the formula in 21-A M.R.S. § 1020-A(4-A), the Commission staff has calculated preliminary late-filing penalties for the four reports listed on page 1 that staff believes should have been filed on October 24, 30, and 31, and December 16, 2025. The number of days late is based on the number of days between the report deadlines and when the financial activity was disclosed on January 16, 2026. Due to the factors listed on the following page, Commission staff intends to recommend the penalties in the column on the right:

Report	Deadline	Days late	Per-centage	Expenditures for Period Reported Late	Preliminary Penalty	Maximum	Staff Recommends Waiver to
11-Day Pre-Election	10/24/2025	83	2%	\$113,550.61	\$188,494.01	\$188,494.01	\$5,000.00
24-Hour	10/30/2025	77	2%	\$10,000.00	\$15,400.00	\$5,000.00	\$1,500.00
24-Hour	10/31/2025	77	2%	\$10,000.00	\$15,400.00	\$5,000.00	\$1,500.00
42-Day Post-Election	12/16/2026	30	2%	\$178,746.17	\$107,247.70	\$107,247.70	\$2,500.00
Totals						\$305,741.71	\$10,500.00

¹ The procedure was to enter a Y in the exSuppOppBQ column in the expenditure section of the data file and then complete the section in the file for associated ballot questions.

Factors that Support a Significant Penalty

Compared to most PACs and ballot question committees, the Maine Democratic Party is a sophisticated filer that often spends \$3-\$4 million on Maine state candidate elections. It is familiar with Maine's scheme for campaign finance reporting. It retains paid staff and counsel to comply with the reporting requirements.

The 11-Day Pre-Election, 24-Hour, and 42-Day Post-Election Reports are a regular feature of campaign finance reporting in Maine. State parties file these reports in connection with primary, general, and special elections. It should have occurred to someone – paid staff, officer, or counsel – that the party was required to file these reports with respect to the November 4, 2025 ballot question election.

The Maine Democratic Party retained counsel that was actively considering in 2025 what disclosure statutes applied to the party's financial activities to oppose Question 1. The requirements to file the 11-Day Pre-Election, 24-Hour, and 42-Post-Election reports are *explicitly listed* in 21-A M.R.S. § 1017-A(4-A)(C)&(E). No agency guidance was necessary to understand that these reports were due.

The public was harmed in not receiving the 11-Day Pre-Election, 24-Hour, and 42-Day Post-Election Reports. The news media often cover who is spending money to support or oppose a ballot question. The affiliation of a state political party with a "yes" or "no" vote on a ballot question is useful information to some voters.

Factors that Support a Waiver

The Commission staff accepts there is no evidence of any intention by the Maine Democratic Party to conceal its ballot question spending. The violations appear to be unintentional.

The Commission should assess penalties that are proportional. The penalty waivers recommended by staff are consistent with the seriousness of the violations while being proportional to the Commission's post-2018 penalty decisions (attached), including a penalty of \$3,000 against the Maine Republican Party for two late 24-Hour Reports.

The Maine Democratic Party relied on the list of required campaign finance reports on the Commission's former eFiling site. While that is relevant, other sources of guidance were available in 2025, such as looking at statute or calling the Commission. A filer with the resources of the Maine Democratic Party should have looked beyond what was listed on the eFiling site, which can provide only limited guidance.

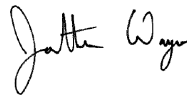
As the party has noted, the Maine Democratic Party's printed communications against Question 1 disclosed they were paid for by the party.

Opportunity to Respond

If the party would like to argue it made no violations, request a waiver of the late-filing penalties, or respond in any other way, please submit a written response by 5:00 p.m. on March 17, 2026. Commission staff will include that response in the packet of meeting materials that we will send to the Commissioners the following day.

Please let me know if you have any questions about this notice. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Wayne". The signature is written in a cursive, flowing style.

Jonathan Wayne
Executive Director



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Kate R. Knox
Shareholder
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March 18, 2026

Via E-Mail

Jonathan Wayne
Executive Director
Maine Commission on Governmental Ethics and Election Practices
135 State House Station
Augusta, Maine 04333-0135

RE: MDP Response to “Recommended Findings of Violation” dated March 3, 2026

Dear Mr. Wayne,

On behalf of the Maine Democratic Party (MDP), we write to respond to your Recommended Filing of Violations dated March 3, 2026. We appreciate the opportunity to provide further context for MDP’s activities and its reporting on Question 1, as the Commission determines its next steps in this proceeding.

Understanding that MDP was not required to file as a separate ballot question committee (“BQC”), we now turn to the specifics of our reports and the adequacy of the information filed. We acknowledge that some Commission members expressed concern about how the filed information was reported, indicating they expected more transparency on the contributions and expenditures used to oppose Question 1.

MDP acknowledges that the transactions filed did not make a direct connection with Question 1. Despite this, we ask the Commission to consider the facts we lay out below which we believe help to explain why transactions were reported as they were. This was not a case of intentional noncompliance but rather the result of a series of assumptions which were then reinforced at many points along the way. MDP emphasizes that these facts are not to deflect responsibility, but to explain how even sophisticated filers can have trouble navigating the system.

FACTUAL SUMMARY

As discussed extensively before this Commission, when MDP considered becoming involved in opposing Question 1, it spent a good deal of time being sure it understood whether its activities required them to create another reporting entity, a BQC. Ultimately concluding that its activities could be reported in its regular reports, MDP proceeded to report those expenditures in their usual course.

As you now know, MDP's activity in opposition to Question 1 included door-to-door canvassing and volunteer and community organizing by staff working on multiple projects and online advertising. Our review of the filings and discussions with the vendor and finance staff identified two factors which resulted in the reports before you now.

- 1. Question 1 Expenditures were not marked as "in opposition to Question 1" due to a series of seemingly small mistakes which supported MDP's belief it was filing correctly."***

MDP uses a 3rd party consulting firm to assist in the actual filings of its reports. Finance staff works closely with the vendor to ensure all transactions are accounted for and that balances for both the state and federal campaign reports are aligned.¹

The "normal flow" described in Footnote 1 is changed in election years when MDP has campaign expenses specifically related to candidates (usually Independent Expenditures). Understanding those entries require more detail that can't be done easily in an upload, they are entered directly by hand into the Ethics reporting system. In that process, the user can encounter a "hard stop" if all data is not entered. Users are then forced to indicate whether the expense was in support or in opposition before the system will allow continued entries.

Here, because MDP determined it was not required to register as a BQC, it also believed that it could continue with its normal flow (used in off-years such as 2025) for reporting. To be clear, MDP could have stopped its normal flow and hand entered its transactions.² Had MDP

¹ The "normal flow" for filings is as follows: Transactions flow from accounting software to filing software that supports the gathering of required contributor information and compliance reporting. The information from the filing software is then exported, reviewed by MDP staff, and bulk uploaded to the Ethics Commission system using the old import manager tool. The import manager process was that the information would be put in the queue, accepted, and any data errors would be elevated for correction by the importer before the report is submitted. The types of data errors that get elevated for correction would typically be missing zip codes, or other required data fields. Our understanding from the compliance vendor is that the system may not provide an error message for a missing support/oppose flag in this scenario. In 2025 when MDP was bulk uploading, the Ethics Commission software vendor had to upload the MDP reports, which meant that the steps outlined above were not followed and the information was simply bulk uploaded.

² In prior testimony, MDP counsel indicated that it might not be possible to click the drop down while uploading data. Our further research indicates the issue was more likely that the data was uploaded to the "operating expenditure" schedule, which doesn't contain drop down boxes. It's not that we couldn't do it, it's that we couldn't do it on the schedule being used..

clearly understood that it should indicate whether staff time, for example, was in support of or opposition to Question 1, it could have figured out how to do so.³

In the normal workflow for 2025 (a non-election year), all expenditures are entered in Schedule B1 “operating expenditures.” That schedule doesn’t contain a drop-down menu – which is why the failure to utilize the drop down wasn’t flagged either by MDP or the system. If MDP had entered the Question 1 expenditures in Schedule B “expenditures to support or oppose,” the drop-down menu would have been present, and flags would likely be raised with the opportunity to fix the entries. MDP doesn’t use Schedule B in off election years unless something is flagged to indicate a change is required (i.e. the unusual situation where they would do an IE for a candidate).

MDP understood it needed to report all its expenditures and contributions related to Question 1, and it did exactly that. What it did not understand, based on a series of misunderstanding, was that it was required to provide additional information in its normal entries. While MDP acknowledges its responsibility, it also argues that the lack of that detail did not result in the reports being substantially incomplete. We support the Commission’s staff recommendation that the Commission find no penalty for the above activity. MDP also stands ready to amend its reports as desired by the Commission.

2. Additional Reports Required for Question 1 Activities were not Accessible to Filers Without a Specific Communication to or from Staff to “Activate” Those Reports.

MDP does not dispute that the statute required it to file additional reports given its Question 1 activity. Despite that seemingly obvious requirement in the statute, it is also understandable that even experienced filers can overlook the same requirement when interfacing with the electronic filing system.

While MDP staff is very familiar and comfortable reaching out for guidance from Ethics staff and their own counsel on how to interpret statutes or how to apply statutory provisions to complicated situations, the issue of *when* reports are filed is so straightforward that virtually all filers rely on the system itself and communications from staff to tell them when their next filing is due. In addition, the requirement for additional reports is not always clearly articulated for filers in Commission materials. For example, in the “Local Party Committee Handbook”⁴ the deadlines are listed as follows:

³ MDP notes that it just completed a special election without an electronic filing system in which it worked closely and diligently with Commission staff to report information in whatever way it was directed to do so, including spreadsheets, fillable PDFs, and emails. MDP is deeply committed to its campaign finance and transparency obligations and has a track record of doing what it required, when what is required is clearly communicated.

⁴ The “Local Party Committee Guidebook” is the only guidebook available on the “State and Local Party Committee” section of the Maine Commission on Governmental Ethics & Election Practices website, <https://www.maine.gov/ethics/committees/party>. The 2025 State Party Committee filing schedule presents the same four-report schedule, https://www.maine.gov/ethics/sites/maine.gov.ethics/files/inline-files/UPDATED%20State%20Party%20and%20PAC%20Filing%20Schedule%2003.18.2025_6.pdf.

ELECTION (EVEN-NUMBERED YEARS) REPORTING SCHEDULE		
<i>Type of Report</i>	<i>Report Due</i>	<i>Reporting Period</i>
July Semiannual	July 15 th	January 1 st – June 30 th
11-Day Pre-General	11 days before the election	July 1 st – (14 days before the election)
January Semiannual	January 15 th	(13 days before the election) – December 31 st
NON-ELECTION (ODD-NUMBERED YEARS) REPORTING SCHEDULE		
<i>Type of Report</i>	<i>Report Due</i>	<i>Reporting Period</i>
July Semiannual	July 15 th	January 1 st – June 30 th
January Semiannual	January 15 th	July 1 st – December 31 st

While the section does note “The law outlines when the reports are due,” one can understand the logic of thinking that the chart which then follows outlines all the reports. There is no indication above that a filer’s activities might change the reporting schedule. This type of presentation is mirrored throughout guidance for political committees.⁵ To be clear, MDP understands it has an obligation to understand and comply with the statute. But we also think it’s important to consider all the other places filers may be given either vague or conflicting signals about what is due.

Commission staff confirmed that the only way to get those reports to appear on MDP’s landing page would be for staff to manually activate the reports to appear on the filing schedule. This staff action would take place either after a call from the filer to the staff or outreach from staff to a filer to check whether they needed reports turned on. For example a member of the Commission staff reached out to Party Committees and PACs in January of 2025 to note that there would be a Special Election on February 25, 2025, and ask whether the receiver planned to participate in the Special Election – and as such - needed staff to add the additional reports to each committee’s filing schedule. In this situation, neither the filer or the staff made this outreach, despite the earlier correspondence between the parties around MDP’s participation in Question 1 and its intent to record its activity on its regular reports.

While we understand staff was working with a less than optimum filing system, the work around required to get the additional reports to be accessible to filers feels like dangerous “inside information” primed to contribute to mistakes. We can find nowhere on the Commission’s website or in its guidance documents where filers are alerted that their outreach is necessary or they will not have access to the required reports. At the very least, reporting schedules and guidebooks should explicitly state that filers need to make sure all the extra reports be activated.

⁵ The guidance handbook for BQCs does note that reports are due 11-Days and 42-Days around the election – which also reinforces the notion for other types of Committees the assumption that, if it were due, it would be noted specifically in a guidance document. On the other hand, an online search still turns up a confusing 2025 PAC, BQC, State Party Committee schedule that does not include 11-day and 42-day reports for any committees, <https://www.maine.gov/ethics/sites/maine.gov.ethics/files/inline-files/REVISED%20State%20Party,%20PAC,%20BQC%20Filing%20Schedule%202025%20v2.pdf>.

Finally, while we have now moved to a new filing system, it is also important to understand how the old system worked so the Commission can understand how heavily filers rely on it to guide reporting. The system was programmed to alert filers to late reports and give specific instructions about upcoming report due dates. If one enters a late transaction, the system will stop and immediately alert the filer to a problem. These automated alerts and display of reports due and missing information are incredibly helpful for filers and help guide them toward fixing mistakes to ensure compliance. The challenge comes when the systems alerts are incomplete and rely on a physical intervention from staff that is not well explained or understood. The system suddenly becomes unreliable – unbeknownst to the filer who relies on it to flag problems.

MDP does not argue it isn't a sophisticated filer. But being a sophisticated filer doesn't mean that one understands all the inside rules about the reporting system. MDP does not often participate in ballot questions, it simply did not know that extra reports were required – and the lack of system flags simply reinforced this belief. Its reliance on filing schedules, guidebooks and the filing system listed "next report due" doesn't excuse it from knowing the rules – but it should certainly greatly mitigate the ultimate outcome here.⁶

WAIVER REQUEST

Further, if the Commission determines a violation occurred, MDP requests a significant waiver from the statutory penalties. As you know, under 21-A M.R.S. § 1062-A(5), the Commission may waive a penalty in whole or in part when (1) the penalty is disproportionate to the experience of the filer, (2) the penalty is disproportionate to the harm suffered by the public, (3) mitigating circumstances.

- 1. The penalties put forth in the staff memo are disproportionate to MDP's level of experience with ballot question filings.*

While the staff memo argues that MDP is a sophisticated filer, it also notes that its work is typically on state candidate elections, not ballot questions. MDP staff have little to no experience in filing ballot measure activities. MDP may be a sophisticated filer but that doesn't necessarily mean that MDP is required to understand all the inside rules about the reporting system for activities which are out of the norm for them. Here, where MDP simply did not know that extra reports were required and all of the signs and contact with the reporting system and staff reinforced that understanding.

⁶ Commission staff notes in their memo that "it should have occurred to someone – paid staff, counsel, or counsel – that the party was required to file these reports..." It then states "...MDP should have looked beyond what was listed on the former eFiling site and consulted with counsel or the Commission staff." Unfortunately, there were many opportunities to ask about filing extra reports. Counsel and Commission staff did talk about the formation of a BQC, extensively. During these discussions, counsel did not ask about the reports, and staff did not offer to turn on the extra reports despite a clear email from MDP stating "all activity related to Question 1 has been and will continue to be disclosed on the regular party committee reports..." (see email exchange before Commission in early portions of this proceeding). Staff did not respond to this email by offering to turn on the additional reports.

- 2. The penalties put forth in the staff memo are disproportionate to the harm suffered by the public.*

MDP does not argue that the information provided on its reports made it difficult for the public to understand which of its expenses related to Question 1. Despite that, the penalties put forward by Commission staff are excessively high and out of proportion to the actions of MDP.

First, it is important to note that all the information related to Question 1 was reported. There is no missing information. The issue is the difficulty the public might have in understanding how to interpret that date. The major contributions to MDP were reported by the Democratic Governor's Association in their own finance reports and clearly indicated they were in opposition to Question 1. Additionally, MDP was very public about their opposition to Question 1. All public communications properly listed MDP in the disclaimer and a review of MDP social media and website clearly indicate they were hiring canvassers to oppose the ballot question. Any member of the public who was interfacing with MDP, either through canvassing or campaign materials, clearly knew MDP was engaging in opposition to Question 1. All of these factors should mitigate against an aggressively high penalty.

- 3. The penalties put forth in the staff memo are disproportionate given the mitigating circumstances of the correspondence between MDP and commission staff.*

For MDP to argue that there was an "error" by Commission staff in this case seems an unfair conclusion to the correspondence between the parties. Instead, MDP feels like it is fair for the Commission to consider the email between counsel and staff where MDP clearly states they will not be forming a BQC and will be filing all of its activity "*in our regular reports.*" While ultimate responsibility lays with MDP, this is yet another moment where an intervention could have happened but did not, further reinforcing to MDP that they were doing things properly.

CONCLUSION

Finally, as the staff memo indicates, there is no evidence of any intention by MDP to conceal its Question 1 activity. The violations were entirely unintentional and MDP acted in good faith in its attempts to understand its reporting requirements. The MDP strongly believes that the harm suffered to the public is not commensurate with the proposed fine, even when lowered by the staff recommendation.

Sincerely,

/s/ Kate Knox

/s/ Lisa Prosienski

Kate Knox
Lisa Prosienski
Counsel to the Maine Democratic Party

Wayne, Jonathan

From: Kate Knox <kknox@bernsteinshur.com>
Sent: Thursday, April 16, 2026 10:04 AM
To: Wayne, Jonathan; Lisa A. Prosienski
Cc: Devon Murphy Anderson
Subject: MDP Additional

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.

Jonathan,

As requested in your correspondence dated March 26, 2026, below please find the answers to your questions.

(1) Since Question 1 was a state (not federal) election, please comment on whether the MDP's (a) phone-banking costs, (b) costs of producing anti-Question 1 stickers and buttons, and (c) revenue from selling stickers and buttons should be disclosed in campaign finance reports filed with the Commission under 21-A M.R.S. § 1017-A?

- a. Phone Banking Costs – there were no reportable costs for the phone banks.
- b. The costs of producing the stickers were \$1437.08. We are happy to amend our reports to add those costs
- c. There was no revenue from selling stickers and buttons

(2) It appears that the MDP should have filed a 24-Hour Report for the October 29, 2025 contribution of \$10,000 made by Nancy Zweng for the purpose of influencing Question 1. Commission staff overlooked this in our March 3, 2026 penalty letter. Commission staff would recommend a reduction of the late-filing penalty from \$5,000 to \$1,500. I believe your March 18 letter fully addresses why a waiver would be appropriate, but please feel free to provide any other argument or comment.

We renew the waiver arguments set forth in our March 18th filing. This 24-hour report was not available for completion on the website as the ballot question extra reporting had not been turned on.

We will be prepared to answer further question on May 6th.

Thank you.

Kate

Kate Knox

she/her/hers pronouns

Co-Chair, Government & Public Affairs

Chair, Board of Directors

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21-A M.R.S. § 1017-A. Reports of contributions and expenditures by party committees

1. Contributions. A party committee shall report all contributions in cash or in kind from a single contributor that in the aggregate total more than \$200. The party committee shall report the name, mailing address, occupation and place of business of each contributor. Contributions of \$200 or less must be reported, and these contributions may be reported as a lump sum.

2. Expenditures to influence campaign. A party committee shall report all expenditures made to influence a campaign, as defined in section 1052, subsection 1. For each expenditure, the party committee shall report:

- A.** The candidate or ballot measure for which the expenditure was made;
- B.** For a candidate, the office sought by the candidate and the district that the candidate seeks to represent;
- C.** The date and amount of each expenditure;
- D.** The purpose of each expenditure, including whether the expenditure was made to support or oppose the candidate or ballot measure; and
- E.** The name and address of each payee.

3. Other expenditures. Operational expenses and other expenditures that are not made to influence a campaign, as defined in section 1052, subsection 1 must be reported separately. The party committee shall report:

- A.** The name and address of each payee;
- B.** The purpose for the expenditure; and
- C.** The date and amount of each expenditure.

4. Filing schedule. [2003, ch. 302, § 2 (RP).]

4-A. Filing schedule. A state party committee shall file its reports according to the following schedule. All reports required under paragraphs A, B and C must be filed by 11:59 p.m. on the day of the filing deadline.

- A.** A state party committee shall file quarterly reports:
 - (1)** On January 15th, which must be complete up to December 31st;
 - (2)** On April 10th, which must be complete up to March 31st;
 - (3)** On July 15th, which must be complete up to June 30th; and
 - (4)** On October 5th, which must be complete up to September 30th.
- B.** During any year in which primary and general elections are held, a state party committee shall file primary and general election reports in addition to the reports required under paragraph A:

(1) On the 11th day before the date on which the election is held, which must be complete up to the 14th day before that date; and

(2) On the 42nd day after the date on which the election is held, which must be complete up to the 35th day after that date.

C. In an election year other than a year described in paragraph B, if a state party committee has received contributions or made expenditures for the purpose of influencing a ballot question election, a special election or a municipal candidate or referendum election subject to Title 30-A, section 2502, the committee shall file preelection and post-election reports:

(1) On the 11th day before the date on which the election is held, which must be complete up to the 14th day before that date; and

(2) On the 42nd day after the date on which the election is held, which must be complete up to the 35th day after that date.

D. A state party committee that files an election report under paragraph B or C is not required to file a quarterly report under paragraph A when the deadline for that quarterly report falls within 10 days of the filing deadline established in paragraph B or C.

E. If a state party committee is required to file a report 11 days before an election pursuant to paragraph B or C, the committee shall report any single contribution of \$10,000 or more received or any single expenditure of \$2,500 or more made after the 14th day before the election and more than 24 hours before 5:00 p.m. on the day of the election within 24 hours of that contribution or expenditure. The committee is not required to include in this report expenditures for overhead expenses or compensation paid to an employee or other member of the campaign staff who has received payments at regular intervals that have been disclosed in previously filed campaign finance reports. As used in this paragraph, "overhead expenses" includes, but is not limited to, rent, utility payments, taxes, insurance premiums or similar administrative expenses.

4-B. Filing schedule for municipal, district and county party committees. Municipal, district and county party committees shall file reports according to the following schedule.

A. Reports filed during an election year must be filed with the commission by 11:59 p.m. on:

(1) July 15th and be complete as of June 30th;

(2) The 11th day before the date on which the general election is held and must be complete up to the 14th day before that date; and

(3) January 15th and be complete as of December 31st.

B. Reports filed during a nonelection year must be filed by 11:59 p.m. on:

(1) July 15th and be complete as of June 30th; and

(2) January 15th and be complete as of December 31st.

C. A committee shall report any single contribution of \$10,000 or more received or any expenditure of \$2,500 or more made after the 14th day before a general or special election and more than 24 hours before 11:59 p.m. on the day of the election within 24 hours of that contribution or expenditure. The committee is not required to include in this report expenditures for overhead expenses or compensation paid to an employee or other member of the campaign staff who has received payments at regular intervals that have been

disclosed in previously filed campaign finance reports. As used in this paragraph, “overhead expenses” includes, but is not limited to, rent, utility payments, taxes, insurance premiums or similar administrative expenses.

4-C. Electronic filing. State party committees shall file each report required by this section through an electronic filing system developed by the commission. The commission may make an exception to this electronic filing requirement if a party committee submits a written request that states that the party committee lacks access to the technology or the technological ability to file reports electronically. The request for an exception must be submitted by March 1st of the election year. The commission shall grant all reasonable requests for exceptions.

5. Penalties. A party committee is subject to the penalties in section 1020-A, subsection 4-A.

6. Notice; forms. A state party committee shall notify all county, district and municipal party committees of the same political party of the party committee reporting requirements. The party committees shall obtain the necessary forms from the commission to complete the filing requirements.

7. Exemption. Any party committee receiving and expending less than \$1,500 in one calendar year is exempt from the reporting requirements of this section for that year.

8. Municipal elections. When a party committee makes contributions or expenditures on behalf of a candidate for municipal office subject to this subchapter, it shall file a copy of the reports required by this section with the clerk in that candidate’s municipality.

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

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

2. Campaign finance reports. A campaign finance report is not timely filed unless a properly signed or electronically submitted copy of the report, substantially conforming to the disclosure requirements of this subchapter, is received by the commission by 11:59 p.m. on the date it is due. Except as provided in subsection 7, the commission shall determine whether a report satisfies the requirements for timely filing. The commission may waive a penalty in whole or in part if the commission determines that the penalty is disproportionate to the size of the candidate's campaign, the level of experience of the candidate, treasurer or campaign staff or the harm suffered by the public from the late disclosure. The commission may waive the penalty in whole or in part if the commission determines the failure to file a timely report was due to mitigating circumstances. For purposes of this section, "mitigating circumstances" means:

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

3. Municipal campaign finance reports. Municipal campaign finance reports must be filed, subject to all the provisions of this subchapter, with the municipal clerk on forms prescribed by the Commission on Governmental Ethics and Election Practices. The municipal clerk shall send any notice of lateness required by subsection 6 and shall notify the commission of any late reports subject to a penalty.

4. Basis for penalties. [MRSA T. 21-A §1020-A, sub-§4 (RP).]

4-A. 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 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.

5. Maximum penalties. [MRSA T. 21-A §1020-A, sub-§5 (RP).]

5-A. Maximum penalties. Penalties assessed under this subchapter may not exceed:

A. Five thousand dollars for reports required under section 1017, subsection 2, paragraph B, C, D, E or H; section 1017, subsection 3-A, paragraph B, C, D, D-1 or F; and section 1017, subsection 4, 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;

A-1. Five thousand dollars for reports required under section 1019-B, subsection 4, 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;

B. Five thousand dollars for state party committee reports required under section 1017-A, subsection 4-A, paragraphs A, B, C and E, 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;

C. One thousand dollars for reports required under section 1017, subsection 2, paragraphs A and F and section 1017, subsection 3-A, paragraphs A and E; or

D. Five hundred dollars for municipal, district and county committees for reports required under section 1017-A, subsection 4-B.

E. [2011, ch. 558, § 5 (RP).]

6. Request for commission determination. If a candidate or a political committee files a report required under this subchapter late, a notice of preliminary penalty must be sent to the candidate or political committee whose registration or campaign finance report was not received by 11:59 p.m. on the deadline date, informing the candidate or political committee of the staff finding of violation and preliminary penalty calculated under subsection 4-A and providing the candidate or political committee with an opportunity to request a determination by the commission. Any request for a determination must be made within 14 calendar days of receipt of the commission's notice. A candidate or political committee requesting a determination may either appear in person or designate a representative to appear on the candidate's or political committee'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.

7. Final notice of penalty. If a determination has been requested by the candidate or political committee and made by the commission, notice of the commission's final determination and the penalty, if any, imposed pursuant to this subchapter must be sent to the candidate and the political 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 candidate and treasurer. A detailed summary of all notices must be provided to the commission.

8. Penalties for failure to file report. If the commission staff finds that a candidate, party 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 candidate, party committee or person within 3 business days following the filing deadline informing the candidate, party committee or person 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 candidate, party committee or person has not filed the report after these 2 notices, the 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 penalty may not exceed the maximum penalties as provided in subsection 5-A. A candidate party committee or other person who fails to file a report as required by this subchapter after the commission has sent the first 2 notices required by this subsection is guilty of a Class E crime. As an alternative to assessing a penalty, the commission may refer the violation to the Office of the Attorney General for potential criminal prosecution.

8-A. Penalties for failure to file report. [2025, ch. 224, § 15 (RP).]

9. List of late-filing candidates. [2025, ch. 224, § 16 (RP).]

10. 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.

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



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

2025 CAMPAIGN FINANCE REPORT

FOR PARTY COMMITTEES

COMMITTEE		TREASURER	
MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME 04332 PHONE:(207) 622-6233 EMAIL: tgrant@mainedems.org		Ms. Susan Searle Sato PO Box 5258 Augusta, ME 04332-5258 PHONE:(107) 622-7432 EMAIL: exec@mainedems.org	
REPORT	DUE DATE	REPORTING PERIOD	
October Quarterly Report	10/06/2025	07/01/2025 - 09/30/2025	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$332,040.87	\$594,101.78
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$17.22
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$332,040.87	\$594,119.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$23,217.48
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$328,123.57	\$635,577.80
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$328,123.57	\$658,795.28
OTHER ACTIVITY		
9. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$11,816.00	\$18,880.00
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, Taylor Grant, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: Taylor Grant
 REPORT FILED ON: 10/6/2025 4:10:39 PM
 LAST MODIFIED: 10/8/2025 4:04:01 PM
 COMMITTEE ID: 763

SCHEDULE A CASH CONTRIBUTIONS

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- | | |
|--|--|
| 1 = Individual | 9 = Candidate / Candidate Committee |
| 2 = Candidate/ Spouse/ Domestic Partner | 10 = General Treasury Transfer |
| 3 = Commercial Source | 11 = Transfer from Previous Campaign |
| 4 = Nonprofit Organization | 12 = Contributors giving \$50 or less |
| 5 = Political Action Committee | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee | 15 = MCEA Payment |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
7/1/2025	Elizabeth Delucia-Harting 434 7th St Apt 4 Brooklyn, NY, 11215	Empowering Work Advisors Founder & Consultant	1	\$15,000.00
7/3/2025	House Democratic Campaign Committee PO Box 2021 Augusta, ME, 04338		6	\$50,000.00
7/7/2025	Justin L. Alford 134 Sheridan St Portland, ME, 04101	N/A Retired	1	\$15,000.00
7/14/2025	Margot Wallach Milliken 157 PINE ST PORTLAND, ME, 04102	N/A Not Employed	1	\$12,500.00
7/14/2025	Roger Milliken, Jr. 157 PINE ST PORTLAND, ME, 04102	Baskahegan Co. Executive	1	\$12,500.00
7/15/2025	Daniel Amory 63 Chadwick St Portland, ME, 04102	N/A Not Employed	1	\$5,000.00
7/27/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
7/28/2025	Bellows for Maine PO Box 151 August, ME, 04332		9	\$335.00
7/28/2025	Hannah Pingree for Gov. Exp. Committee 108 Banks Cove Rd North Haven, ME, 04853		9	\$585.00

7/28/2025	Senate Democratic Campaign Committee 22 Smith St Augusta, ME, 04330		5	\$255.00
7/31/2025	Angus For Governor 110 Marginal Way # 105 Portland, ME, 04101		9	\$250.00
8/5/2025	Democratic Governors' Association - Maine 1401 K ST NW STE 200 WASHINGTON, DC, 20005		5	\$50,000.00
8/5/2025	Maine Education Association 35 COMMUNITY DR AUGUSTA, ME, 04330		5	\$2,500.00
8/5/2025	Pingree for Congress PO BOX 17613 PORTLAND, ME, 04112		3	\$500.00
8/5/2025	Seacoast Management Company 30 Governors Way Topsham, ME, 04086-1680		3	\$5,000.00
8/12/2025	Carol A. Wishcamper 35 LITTLE RIVER LN FREEPORT, ME, 04032-6345	Carol Wishcamper Organizational Consulting Organizational Consultant	1	\$10,000.00
8/12/2025	Lyndel J. Wishcamper 35 LITTLE RIVER LN FREEPORT, ME, 04032-6345	The Wishcamper Companies Inc. Business	1	\$10,000.00
8/14/2025	Democratic Governors' Association - Maine 1401 K ST NW STE 200 WASHINGTON, DC, 20005		5	\$20,000.00
8/18/2025	House Democratic Campaign Committee PO Box 2021 Augusta, ME, 04338		6	\$60,000.00
8/18/2025	Senate Democratic Campaign Committee 22 Smith St Augusta, ME, 04330		5	\$25,000.00
8/24/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
9/7/2025	Mary Devlin 43 Beach Ln Damariscotta, ME, 04543	N/A Not Employed	1	\$250.00
9/7/2025	Maurice Cunningham 43 BEACH LANE DAMARISCOTTA, ME, 04543	N/A Not Employed	1	\$250.00

9/7/2025	Peggy Rotundo 446 College St Lewiston, ME, 04240	N/A Not Employed	1	\$250.00
9/8/2025	Maine State Building Trades Council PAC 21 Gabriel Dr Augusta, ME, 04330		3	\$1,000.00
9/14/2025	Anne Gallaudet 23 Coulthard Farms Rd Scarborough, ME, 04074	N/A Retired	1	\$300.00
9/14/2025	Bj McCollister 3 Orange St Portland, ME, 04102	Resurgam Group Consultant	1	\$250.00
9/14/2025	Cathy Bennigson 150 Gates Rd Jefferson, ME, 04348	N/A Not Employed	1	\$250.00
9/14/2025	Ina Indriani Demers 4 GORHAM RD WISCASSET, ME, 04578	Portland public schools Teacher	1	\$250.00
9/14/2025	Michael Brown Dowling 64 Goldenrod Ln North Yarmouth, ME, 04097	207 Pediatric Dentistry Pediatric Dentist	1	\$1,000.00
9/21/2025	Paul E. Peck 47 SWEETSER RD KINGFIELD, ME, 04947	Drummond & Drummond Attorney	1	\$250.00
9/21/2025	R. Chris Roark PO BOX 200 NEW HARBOR, ME, 04554	N/A Not Employed	1	\$250.00
9/28/2025	David Warren 53 McAuley Way Unit 304 Portland, ME, 04103	Verrill Dana LLP Attorney	1	\$500.00
9/28/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
9/30/2025	Contributors giving \$200 or less		14	\$2,240.87
9/30/2025	Kathryn T. Flannery 17 Steen Rd Arrowsic, ME, 04530	N/A Not Employed	1	\$250.00
9/30/2025	Sea Coast Management Company 20 Blueberry Ln Falmouth, ME, 04105-1856		3	\$30,000.00

9/30/2025	STEPHEN W MORIARTY 12 Oak St Cumberland Center, ME, 04021	General BusinessEMPLOYMENT INFO REQUESTED	1	\$250.00
TOTAL CASH CONTRIBUTIONS				\$332,040.87

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

- In-kind contributions are goods and services (including facilities) that a candidate received at no cost or at a cost less than the fair market value. they include all goods and services purchased for the campaign by the candidate or supporters if the campaign does not expect to reimburse the candidate or supporter. These contributions may come from the candidate, candidate's family, supporters, PACs, party committees, or other entities.
- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- In-kind contributions of \$50 or less can be added together and reported as a lump sum.
- If the candidate received a discount on goods and services, the amount of the discount must be reported as an in-kind contribution.
- Total contributions (cash and in-kind) from the same source (except the candidate and candidate's spouse or domestic partner) may NOT exceed \$350 in any election for the legislative candidates, \$750 for county candidates, or \$1500 for gubernatorial candidates. For party candidates, the primary and general elections are considered separate election. For non-party candidates, there is only one election, the general election.

1 = Individual

9 = Candidate / Candidate Committee

2 = Candidate/ Spouse/ Domestic Partner

10 = General Treasury Transfer

3 = Commercial Source

11 = Transfer from Previous Campaign

4 = Nonprofit Organization

12 = Contributors giving \$50 or less

5 = Political Action Committee

13 = Contributors giving \$100 or less

6 = Political Party Committee

14 = Contributors giving \$200 or less

7 = Ballot Question Committee

15 = MCEA Payment

8 = Other Candidate/ Candidate Committee

16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	EMPLOYER AND OCCUPATION	DESCRIPTION (of goods, services, facilities, or discounts received)	TYPE	AMOUNT
8/25/2025	Paul Maritz 7231 W Mercer Way Mercer Island, WA, 98040	Retired Retired	Software	1	\$11,262.00
9/8/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$166.90
9/23/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data swap	7	\$387.10
TOTAL IN-KIND CONTRIBUTIONS					\$11,816.00

**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
7/3/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$1,665.99
7/3/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$1,712.23
7/3/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$4,181.01
7/3/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.31
7/3/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.82
7/3/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
7/3/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,717.48
7/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$12.13
7/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
7/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$488.26

7/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,704.30
7/3/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
7/3/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.87
7/3/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
7/3/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,535.69
7/8/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$204.31
7/13/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.70
7/18/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$1,751.26
7/18/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$1,881.74
7/18/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$4,180.97
7/18/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.31
7/18/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.84
7/18/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
7/18/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,839.81
7/18/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
7/18/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,744.72
7/18/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15

7/18/2025	Sylvia De Boer 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$323.77
7/18/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.86
7/18/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
7/18/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,555.63
7/20/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.13
7/22/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$587.05
7/22/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$166.76
7/23/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$2,610.94
7/25/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$7,515.55
7/27/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.99
8/1/2025	Northeast Delta Dental PO Box 9566 Manchester, NH, 03108-9566	Dental Insurance	PER	\$1,018.16
8/1/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$239.56
8/5/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$2,503.35
8/5/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.31
8/5/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.83
8/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
8/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,839.80

8/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
8/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,703.80
8/5/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$252.58
8/5/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$161.66
8/5/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,021.93
8/5/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.14
8/5/2025	Sylvia De Boer 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$807.18
8/5/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.86
8/5/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
8/5/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$958.68
8/10/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.66
8/12/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$80.35
8/12/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$270.59
8/12/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$89.44
8/17/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$1.34
8/18/2025	Resonance Campaigns 1319 F St NW Ste # 301 Washington, DC, 20004	Printing Expenses	LIT	\$7,000.00

8/19/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$7,515.55
8/19/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$43.22
8/20/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$10,306.13
8/20/2025	Northeast Delta Dental PO Box 9566 Manchester, NH, 03108-9566	Dental Insurance	PER	\$596.90
8/20/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.30
8/20/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.82
8/20/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
8/20/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,839.81
8/20/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
8/20/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,879.66
8/20/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,463.54
8/20/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,188.23
8/20/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,021.94
8/20/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$638.72
8/20/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$141.45
8/20/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.16
8/20/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.87

8/20/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
8/20/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,535.18
8/24/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.99
8/26/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$288.50
8/26/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$18.22
8/28/2025	Amalgamated Bank 275 7TH AVE NEW YORK, NY, 10001	Bank Fees	OTH	\$16.00
8/29/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$852.00
8/31/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.20
9/3/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$230.39
9/3/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$56.54
9/3/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$13.18
9/3/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$157.27
9/5/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$12,688.93
9/5/2025	IBEW Local 1837 16 Old Winthrop Rd Manchester, ME, 04351	Union Dues	PER	\$783.79
9/5/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.32
9/5/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,205.64

9/5/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.84
9/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
9/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.64
9/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$50.00
9/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,703.81
9/5/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,673.38
9/5/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,410.52
9/5/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,103.18
9/5/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
9/5/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,210.80
9/5/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,688.38
9/5/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,440.65
9/5/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.14
9/5/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.87
9/5/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
9/5/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,382.30
9/7/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$53.34

9/9/2025	A1 Diner 3 Pearl Harbor Remembrance Brg Gardiner, ME, 04345	Meals	TRV	\$35.10
9/9/2025	Bagel Mainea 190 WESTERN AVE AUGUSTA, ME, 04330	Meals	TRV	\$36.16
9/9/2025	Bird & Co. 539 Deering Ave Portland, ME, 04103	Meals	TRV	\$38.59
9/9/2025	Darby's 155 HIGH ST BELFAST, ME, 04915	Meals	TRV	\$90.87
9/9/2025	Marshall Wharf Brewing Company 36 Marshall Wharf Belfast, ME, 04915	Meals	TRV	\$134.39
9/9/2025	Narrows Tavern 15 Friendship Rd Waldoboro, ME, 04572	Meals	TRV	\$64.53
9/9/2025	Pepino's Taco Stand 513 S Main St Brewer, ME, 04412	Meals	TRV	\$43.74
9/9/2025	Resonance Campaigns 1319 F St NW Ste # 301 Washington, DC, 20004	printing expense	LIT	\$11,000.00
9/9/2025	Taste Jamaica 190 State St Ellsworth, ME, 04605	Meals	TRV	\$85.28
9/9/2025	The River Tap & Grill 52 Golf Course Ln Hollis Center, ME, 04042	Meals	TRV	\$53.00
9/9/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$1,422.98
9/9/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$378.48
9/9/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$158.43
9/9/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$169.30
9/10/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$7,515.55
9/14/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$95.62
9/16/2025	Copy-It 483 Elm St # 101 Biddeford, ME, 04005	Printing Expenses	LIT	\$44.84

9/16/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$479.45
9/16/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$233.41
9/19/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$12,882.37
9/19/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.30
9/19/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,383.56
9/19/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.83
9/19/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.62
9/19/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
9/19/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$2,073.07
9/19/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,510.84
9/19/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,593.77
9/19/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,059.93

9/19/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Telephone Stipend	PER	\$50.00
9/19/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,317.24
9/19/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,290.10
9/19/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,386.68
9/19/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
9/19/2025	Sylvia De Boer 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$556.80
9/19/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,290.86
9/19/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Telephone Stipend	PER	\$50.00
9/19/2025	Zach Birger 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,539.40
9/21/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$48.41
9/22/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$250.26
9/22/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$274.97
9/26/2025	Amalgamated Bank 275 7TH AVE NEW YORK, NY, 10001	Bank Fees	OTH	\$48.00
9/28/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$24.69

9/29/2025	FTX Recovery Trust 2000 Center St Berkeley, CA, 94704	Bankruptcy Proceeding Settlement Payment	OTH	\$88,000.00
9/30/2025	Staples - Corporate 500 STAPLES DR FRAMINGHAM, MA, 01702	Office Supplies	OFF	\$93.70
9/30/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$13.63
9/30/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$99.17
9/30/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$120.45
9/30/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$35.29
9/30/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$63.03
9/30/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$97.83
9/30/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$225.65
TOTAL OPERATING EXPENDITURES				\$328,123.57



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

2026 CAMPAIGN FINANCE REPORT

FOR PARTY COMMITTEES

COMMITTEE		TREASURER	
MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME 04332 PHONE:(207) 622-6233 EMAIL: tgrant@mainedems.org		Ms. Susan Searle Sato PO Box 5258 Augusta, ME 04332-5258 PHONE:(107) 622-7432 EMAIL: exec@mainedems.org	
REPORT	DUE DATE	REPORTING PERIOD	
January Quarterly Report	01/15/2026	10/01/2025 - 12/31/2025	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$402,736.00	\$996,837.78
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$2,489.49	\$2,506.71
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$405,225.49	\$999,344.49
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$23,217.48
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$330,685.32	\$966,263.12
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$330,685.32	\$989,480.60
OTHER ACTIVITY		
9. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$17,025.10	\$35,905.10
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, Tara Gilligan, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: Tara Gilligan
 REPORT FILED ON: 1/15/2026 11:01:48 AM
 LAST MODIFIED:
 COMMITTEE ID: 763

SCHEDULE A CASH CONTRIBUTIONS

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- | | |
|--|---|
| <ul style="list-style-type: none"> 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 | <ul style="list-style-type: none"> 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 |
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DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
10/3/2025	Democratic Governors' Association - Maine 1401 K ST NW STE 200 WASHINGTON, DC, 20005		5	\$80,000.00
10/3/2025	House Democratic Campaign Committee PO Box 2021 Augusta, ME, 04338		6	\$50,000.00
10/5/2025	William E. Little 1107 5TH AVE NEW YORK, NY, 10128-0145	N/A Not Employed	1	\$2,000.00
10/12/2025	Linda Ann Coleman 26 CUSHMAN ST PORTLAND, ME, 04102	N/A Not Employed	1	\$300.00
10/15/2025	Sea Coast Management Company 20 Blueberry Ln Falmouth, ME, 04105-1856		3	\$30,000.00
10/16/2025	Laura Gottsman 1348 CEDAR ST SAN CARLOS, CA, 94070	N/A Retired	1	\$10,000.00
10/18/2025	Adam D. Lee 10 Harris Rd Cumberland, ME, 04021-3726	Lee Auto Malls Automotive Industry	1	\$5,000.00
10/18/2025	Elizabeth Delucia-Harting 434 7th St Apt 4 Brooklyn, NY, 11215	Empowering Work Advisors Founder & Consultant	1	\$300.00
10/19/2025	Henry Lord 313 AUDUBON CT NEW HAVEN, CT, 06510	N/A Retired	1	\$500.00

10/19/2025	Joan Maxwell 3150 South St NW Apt 3F Washington, DC, 20007	N/A Not Employed	1	\$5,000.00
10/26/2025	Todd Webster 800 Maine Ave SW FI 7 Washington, DC, 20024	CGA Consultant	1	\$500.00
10/26/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
10/29/2025	Kathleen Burke 7 Summer Breeze Ln Kennebunkport, ME, 04046	General BusinessEMPLOYMENT INFO REQUESTED	1	\$500.00
10/29/2025	Nancy Zweng 26566 Carmelo St Carmel, CA, 93923	N/A Retired	1	\$10,000.00
10/29/2025	Senate Democratic Campaign Committee 22 Smith St Augusta, ME, 04330		5	\$40,000.00
11/2/2025	Angus King 25 Bay St Portland, ME, 04103	N/A Not Employed	1	\$1,500.00
11/19/2025	Mitchell Tardy Government Affairs 106 Sewall St Augusta, ME, 04330		3	\$1,000.00
11/23/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
12/2/2025	Blue Warriors 600 Pennsylvania Ave SE Unit 15180 Washington, DC, 20003		3	\$3,000.00
12/9/2025	Ullico Management Company, LLC 8403 Colesville Rd Silver Spring, MD, 20910		3	\$5,000.00
12/12/2025	House Democratic Campaign Committee PO Box 2021 Augusta, ME, 04338		6	\$75,000.00
12/15/2025	Daniel R Tishman 666 5th Ave FI 38 New York, NY, 10103	Tishman Realty & Construction Office and Administrative Occupations	1	\$10,000.00
12/15/2025	Iron Workers Local 7 PO Box 579 Clinton, ME, 04927		5	\$250.00
12/19/2025	Save Maine Absentee Voting Inc 411 Congress St Portland, ME, 04101		3	\$1,500.00

12/28/2025	William L. Neilson 69 Mill Island Rd Arrowsic, ME, 04530	N/A Not Currently Employed	1	\$25.00
12/31/2025	Churchill Downs 600 N Hurstbourne Pkwy Ste 400 Louisville, KY, 40222		3	\$5,000.00
12/31/2025	Contributors giving \$200 or less		14	\$1,311.00
12/31/2025	Senate Democratic Campaign Committee 22 Smith St Augusta, ME, 04330		5	\$65,000.00
TOTAL CASH CONTRIBUTIONS				\$402,736.00

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

- In-kind contributions are goods and services (including facilities) that a candidate received at no cost or at a cost less than the fair market value. they include all goods and services purchased for the campaign by the candidate or supporters if the campaign does not expect to reimburse the candidate or supporter. These contributions may come from the candidate, candidate's family, supporters, PACs, party committees, or other entities.
- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- In-kind contributions of \$50 or less can be added together and reported as a lump sum.
- If the candidate received a discount on goods and services, the amount of the discount must be reported as an in-kind contribution.
- Total contributions (cash and in-kind) from the same source (except the candidate and candidate's spouse or domestic partner) may NOT exceed \$350 in any election for the legislative candidates, \$750 for county candidates, or \$1500 for gubernatorial candidates. For party candidates, the primary and general elections are considered separate election. For non-party candidates, there is only one election, the general election.

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|--|--|
| 1 = Individual | 9 = Candidate / Candidate Committee |
| 2 = Candidate/ Spouse/ Domestic Partner | 10 = General Treasury Transfer |
| 3 = Commercial Source | 11 = Transfer from Previous Campaign |
| 4 = Nonprofit Organization | 12 = Contributors giving \$50 or less |
| 5 = Political Action Committee | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee | 15 = MCEA Payment |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution |

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	EMPLOYER AND OCCUPATION	DESCRIPTION (of goods, services, facilities, or discounts received)	TYPE	AMOUNT
10/2/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$383.10
10/14/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$406.30
10/23/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$218.00
10/28/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Video Production & Travel Expenses	7	\$15,185.20
10/30/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$221.60
11/1/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$76.20
11/2/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$22.00

11/3/2025	Save Maine Absentee Voting 411 Congress Street Portland, ME, 04101		Data Swap	7	\$18.70
11/8/2025	Planned Parenthood Maine Action Fund 443 CONGRESS ST PORTLAND, ME, 04101		Staff Expenses	5	\$494.00
TOTAL IN-KIND CONTRIBUTIONS					\$17,025.10

**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
10/3/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$13,132.72
10/3/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.30
10/3/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,445.91
10/3/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.82
10/3/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.64
10/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,925.38
10/3/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,446.56
10/3/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,339.46
10/3/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,059.94
10/3/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,289.49

10/3/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,461.58
10/3/2025	Natalie Dix 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,349.28
10/3/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,748.36
10/3/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
10/3/2025	Sylvia De Boer 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$602.02
10/3/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
10/5/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$83.94
10/8/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$225.34
10/8/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$328.61
10/8/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$14.92
10/8/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$271.50
10/8/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$79.29
10/9/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$11,922.53
10/9/2025	Northeast Delta Dental PO Box 9566 Manchester, NH, 03108-9566	Health Insurance	PER	\$797.38
10/9/2025	Northeast Delta Dental PO Box 9566 Manchester, NH, 03108-9566	Health Insurance	PER	\$797.38
10/12/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$2.78
10/15/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$278.43

10/15/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$141.48
10/15/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$255.86
10/15/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$100.49
10/19/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$217.45
10/20/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$13,126.96
10/20/2025	Resonance Campaigns 1319 F St NW Ste # 301 Washington, DC, 20004	Printing - Literature	LIT	\$15,750.00
10/20/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.32
10/20/2025	Anne Merkel 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$242.48
10/20/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,686.03
10/20/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.84
10/20/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.64
10/20/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,962.30
10/20/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,639.38
10/20/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,593.78
10/20/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,059.93
10/20/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,372.72

10/20/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,590.10
10/20/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,549.92
10/20/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.14
10/20/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
10/26/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$44.45
10/28/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$267.54
10/28/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$57.68
10/28/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$59.34
10/28/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$74.88
10/28/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$123.60
10/28/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$240.37
10/29/2025	Amalgamated Bank 275 7TH AVE NEW YORK, NY, 10001	Bank Fees	OTH	\$0.25
10/29/2025	Frame Media Strategies LLC 188 State St Ste 203 Portland, ME, 04101	Media Consulting	PRO	\$10,000.00
10/30/2025	Frame Media Strategies LLC 188 State St Ste 203 Portland, ME, 04101	Media Consulting	PRO	\$10,000.00
11/4/2025	Orange Bike Brewing Company 31 Diamond St Ste D Portland, ME, 04101	Event Venue & Refreshments	EVT	\$4,000.00
11/5/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$14,552.65

11/5/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$59.25
11/5/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.30
11/5/2025	Anne Merkel 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,936.67
11/5/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,727.84
11/5/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.83
11/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.63
11/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$2,302.82
11/5/2025	Emily Gerencer 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,485.60
11/5/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,688.89
11/5/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$3,001.67
11/5/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,248.39
11/5/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,786.29
11/5/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,632.12
11/5/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
11/5/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
11/7/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$130.96
11/7/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$236.56

11/7/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$358.13
11/7/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$435.24
11/7/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$18.46
11/7/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$22.01
11/7/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$120.27
11/7/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$272.63
11/7/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$366.59
11/7/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$101.41
11/7/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$106.00
11/9/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant fees	OTH	\$0.40
11/10/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$86.85
11/10/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$937.41
11/16/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.60
11/18/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$14,833.92
11/18/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$1,063.11
11/18/2025	Marc G. Malon, II 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$347.22

11/20/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$13,834.39
11/20/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.32
11/20/2025	Anne Merkel 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,721.44
11/20/2025	Benjamin Costa 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,940.35
11/20/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.82
11/20/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.64
11/20/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$2,686.94
11/20/2025	Hollie Watts 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,320.31
11/20/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$3,001.69
11/20/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,475.80
11/20/2025	Kira Skjoldborg 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,781.85
11/20/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,632.11
11/20/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
11/20/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
11/23/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$1.79
11/26/2025	Amalgamated Bank 275 7TH AVE NEW YORK, NY, 10001	Bank Fees	OTH	\$48.50
12/3/2025	Anthem Blue Cross and Blue Shield PO BOX 11792 NEWARK, NJ, 07101-4792	Health Insurance	PER	\$8,566.89

12/3/2025	Northeast Delta Dental PO Box 9566 Manchester, NH, 03108-9566	Health Insurance	PER	\$847.50
12/3/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$670.40
12/3/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$581.28
12/3/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Mileage	TRV	\$313.38
12/3/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Mileage	TRV	\$79.42
12/5/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$10,776.36
12/5/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.30
12/5/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.84
12/5/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.63
12/5/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,999.22
12/5/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,059.93
12/5/2025	Megan Preambo 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,882.69
12/5/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,632.12
12/5/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.15
12/5/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
12/7/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.04
12/9/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$175.32

12/14/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.60
12/19/2025	Gusto Inc 525 20th St San Francisco, CA, 94107	Payroll Taxes	PER	\$11,790.60
12/19/2025	Amy Bouchard 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$2,888.31
12/19/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$1,493.79
12/19/2025	Brian Colleran 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,018.83
12/19/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$1,291.63
12/19/2025	Dustin A Small PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,959.30
12/19/2025	Jay Bowie 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$1,059.94
12/19/2025	John Baxter PO Box 5258 Augusta, ME, 04332	Payroll	PER	\$1,444.14
12/19/2025	Megan Preambo 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$3,163.35
12/19/2025	Samuel Purinton 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$681.73
12/19/2025	Sara Axson 320 WATER ST FL 3 AUGUSTA, ME, 04330	Payroll	PER	\$2,632.11
12/19/2025	Sean Christopher Smith 320 Water St Fl 3 Augusta, ME, 04430	Payroll	PER	\$2,584.14
12/19/2025	William Parmacek 320 Water St Fl 3 Augusta, ME, 04330	Payroll	PER	\$3,546.54
12/28/2025	ActBlue 14 Arrow St Ste 11 Cambridge, MA, 02138	Merchant Fees	OTH	\$0.99
12/30/2025	Daniel Michael Lord 320 Water St Fl 3 Augusta, ME, 04330	Mileage	TRV	\$832.54
TOTAL OPERATING EXPENDITURES				\$330,685.32

November 19, 2025

Maine Commission on Governmental Ethics and Election Practices
45 Memorial Circle Augusta, ME 04330

Re: Formal Request for Investigation into Potential Violations of Maine Campaign Finance Laws by the Maine Democratic Party Related to the 2025 Ballot Question 1 Campaign

Dear Commissioners and Staff:

I am writing to formally request that the Commission open a comprehensive investigation into the Maine Democratic Party's activities to influence the outcome of Question 1 on the November 4, 2025, statewide ballot (the citizen-initiated measure concerning voter identification and absentee voting procedures). Publicly available information strongly suggests that the Maine Democratic Party received contributions and made expenditures exceeding \$5,000 for the purpose of opposing Question 1 but failed to register as a Ballot Question Committee (BQC) or file the required campaign finance reports, in apparent violation of 21-A M.R.S. § 1052-A and related provisions.

Under Maine law, any organization—including a state party committee—that receives contributions or makes expenditures exceeding \$5,000 to initiate or influence a statewide ballot question must register as a BQC within seven days of exceeding the threshold and file regular campaign finance reports, including quarterly reports, 11-day pre-election reports, and any required 24-hour reports. These reports must separately disclose all contributions received and expenditures made for ballot question advocacy.

Evidence from public sources indicates that the Maine Democratic Party far exceeded the \$5,000 threshold in its efforts to defeat Question 1, yet it appears to have reported these activities only (if at all) through its regular party committee filings rather than a dedicated BQC. Specific concerns include, but are not limited to, the following:

Contributions Received for the Purpose of Influencing Question 1

- Reports filed by DGA Maine (a registered BQC opposing Question 1) show multiple contributions to the Maine Democratic Party explicitly designated for opposing Question 1, including at least \$50,000 on August 5, 2025, \$20,000 on August 14, 2025 and \$80,000 during the period covered by the 11-day pre-election report. Additional contributions from DGA Maine and potentially other sources appear likely.
- These earmarked contributions triggered the obligation to register and report as a BQC upon exceeding \$5,000, yet no such registration or separate BQC filings are publicly visible.

Expenditures Made to Influence Question 1

- Public job postings on the Maine Democratic Party's website, social media (e.g., Facebook post dated September 19, 2025), and job boards advertised paid positions specifically to oppose Question 1. The Party's October quarterly party committee report shows a significant increase in payroll expenses (approximately seven additional individuals, totaling roughly \$30,000, excluding benefits or mileage), which appear directly attributable to these ballot-question-related hires.
- Campaign literature (palm cards, handouts) bearing the disclaimer "Paid for by the Maine Democratic Party" and explicitly advocating "No on Question 1" was widely distributed at door-knocking events beginning as early as August 2025 and continuing through October. Media reports and public photos document large-scale events involving thousands of such items, reasonably exceeding \$5,000 in printing and distribution costs alone (potentially including reported expenses of \$7,000 on August 18, 2025, and \$11,000 on September 9, 2025).
- Campaign apparel and buttons with explicit "No on 1" messaging were produced, distributed, and sold via the Party's online store (administered by Bright Blue Ink). Even if sales are treated as general contributions, bulk purchases and free distribution to staff/volunteers constitute reportable expenditures or in-kind contributions to ballot question advocacy.
- Social media graphics and phone-banking recruitment posts by the Maine Democratic Party promoted opposition to Question 1; the funding and staffing of these efforts require scrutiny for proper attribution and reporting.

Given the scale and visibility of these activities, the Maine Democratic Party's apparent failure to register a BQC or file separate ballot-question reports has deprived the public of critical transparency into the sources and uses of funds during a high-profile referendum.

I respectfully request that the Commission investigate these matters thoroughly, including but not limited to:

- Whether the Maine Democratic Party exceeded the \$5,000 threshold for BQC registration and, if so, the date on which the threshold was crossed;
- The full scope of contributions received and expenditures made to influence Question 1;
- Compliance with all required reporting deadlines (including any missed 11-day pre-election or 24-hour reports); and
- Appropriate penalties for each established violation, as provided by law.

Attachments referenced in this letter (job postings, photographs of literature and apparel, social media screenshots) are enclosed for your review. Additional documentation is available upon request.

Transparency in ballot question financing is essential to public confidence in Maine's electoral process. I appreciate the Commission's prompt attention to this matter and stand ready to provide any further information or assistance.

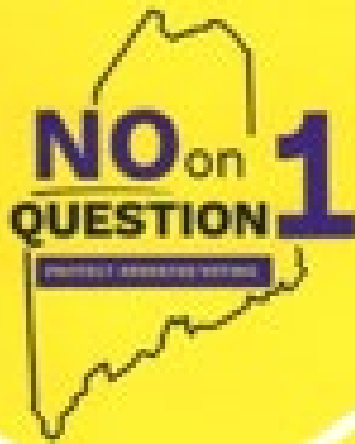
Thank you for your service to the people of Maine.

Sincerely,

A handwritten signature in black ink that reads "Alex Titcomb". The signature is written in a cursive, flowing style.

Alex Titcomb

Concerned Citizen of Maine



Protect Mainer's Right to Vote.

Join Mainer's in protecting absentee voting and stopping
the attack on rural, working, and senior voters by

VOTING NO ON QUESTION 1
on Tuesday, November 4th, 2025.

QUESTION 1 ASKS:

"Do you want to change Maine election laws to eliminate two days of absentee voting, prohibit requests for absentee ballots by phone or family members, end ongoing absentee voter status for seniors and people with disabilities, ban prepaid postage on absentee ballot return envelopes, limit the number of drop boxes, require voters to show certain photo ID before voting, and make other changes to our elections?"

Learn more, request your
absentee ballot, and take the
pledge to vote NO on Question 1.



Or visit mainedems.org/protectabsentee

Created by the Maine Democratic Party, 2025. All rights reserved. All content
has been prepared and submitted by the candidate. The logo features the Maine
Democratic Party seal and the slogan 'Maine Democrats'.



In 2024, 40% of Mainer's voted absentee.

Maine's absentee voting system is
secure, reliable, and widely popular.

If passed, Question 1 would dismantle the
Maine absentee voting system that we
know and rely on by:

- ✗ Banning prepaid return postage for
absentee ballots
- ✗ Preventing ballot requests by phone or for
a family member
- ✗ Ending ongoing absentee voter status for
seniors and voters with disabilities

Rural Mainer's, Mainer's with disabilities, our seniors,
and people who work multiple jobs - eligible voters
who are disproportionately more likely to cast
absentee ballots - will no longer be able to cast
their ballot by mail.

Join Mainer's in protecting absentee voting and stopping
the attack on rural, working, and senior voters by

VOTING NO ON QUESTION 1
on Tuesday, November 4th, 2025.

mainedems.org/protectabsentee

MEDEMS

MAINE DEMOCRATIC PARTY

PHONEBANK

**TO SAVE
ABSENTEE
VOTING**

Join a shift today!

Sat, Nov 1 — 6 PM

Sun, Nov 2 — 9 AM

Mon, Nov 3 — 12 PM

Tues, Nov 4 — 9 , 12, 3, 6





Deputy Field Director

We are looking for a highly motivated, passionate, and talented Deputy Field Director to join our organizing team in Maine.

The Deputy Field Director is responsible for managing the Field Organizers on the Question 1 organizing program in Maine. They will lead the implementation of a variety of tactics to build capacity, develop leadership, and meet voters all Maine. They will collaborate with other field staff to identify challenges facing organizers and develop solutions to help staff grow and excel. They report to the Field Director and will work with them to implement and execute the program to defeat Question 1. At their core, the Deputy Field Director thrives when developing a culture and program structure that sets staff up for success.

About the Role

This is an opportunity to be on the front lines of one of the most important fights in Maine this year. The Deputy Field Director will be instrumental in defeating Question 1, a dangerous referendum that would make it harder for Mainers to vote. You'll be part of managing and motivating a hardworking, passionate team fighting for our democracy, working in the field across Maine. This job is ideal for someone with great people skills, managerial experience, a strong work ethic, and a passion for making a difference in Maine. This position reports to MDP's Field Director to start and is a full-time position through the second week of November 2025 with the opportunity to continue working at MDP if the circumstances allow.

Responsibilities

- Manage and train on an ongoing basis a team of field organizers to meet voter contact and capacity-building goals.
- Develop strategies and systems that lead your team to successfully meet daily and weekly organizing metrics, as well as maintain data integrity.
- Build and maintain political relationships with local MDP town and county leaders to increase buy-in and trust in the coordinated campaign at large.
- Ensure that all Field staff are trained on the technical aspects of the job, and coached on how to do their job better daily.
- Keep your team focused and motivated in a high-stress, rigorous work schedule and environment.
- Adhere to stated deadlines and maintain effective communication with MDP's

Field Director, Executive Director and other senior staff.

You'd be a good fit for this role if you have...

- At least one cycle of organizing experience and with some experience managing preferred.
- Strong commitment to Democratic values and enthusiasm for protecting voting rights and electing Democrats up and down the ballot.
- You love building team culture - setting structures, creating new traditions, and building team identity.
- You're eager to manage a diverse team with different experiences and perspectives, and committed to helping them grow and succeed.
- You are a relationship builder - you make friends everywhere you go and are ready to build successful meaningful relationships with your team and relationships in the communities you are organizing.
- You are goal-oriented and self-disciplined; able to meet tight deadlines and multitask.
- You thrive in fast-paced ever-changing environments and eat new priorities for breakfast.
- Ability to work long and irregular hours, including nights and weekends.
- You have access to reliable transportation, and are willing to travel frequently.

How to apply:

Please send your cover letter and resume to jbowie@mainedems.org with "Deputy Field Director" in the subject line. Applications will be accepted on a rolling basis. Relocation assistance is available if needed.

This is a full-time, temporary position through November 2025. Salary is dependent on experience and is in the \$60,000 range. This position includes a full benefits package and is part of the Maine Democratic Party's bargaining unit, represented by the International Brotherhood of Electrical Workers Local #1837.

These positions are based in Maine and require daily in-person voter contact, including knocking doors, making phone dials, and attending local democratic committees both in-person and virtually.

The Maine Democratic Party is an equal opportunity employer and it is our policy and our core value to recruit, hire, train, promote and administer any and all personnel actions without regard to sex, race, age, color, creed, national origin, religion, economic status, sexual orientation, veteran status, gender identity or expression, ethnic identity or physical disability, or any other legally protected basis.



Field Organizers

The Maine Democratic Party (MDP) is looking for Field Organizers to execute daily voter outreach to help defeat the voter suppression referendum that is on Maine's ballot this November. This includes knocking on doors, phonebanking and engaging community members about the stakes of the 2025 referendum. No prior political or campaign experience is required—we are especially interested in applicants with service industry, customer service, or community-based work backgrounds.

About the Role

This is an opportunity to be on the front lines of one of the most important fights in Maine this year. Field Organizers will be responsible for talking directly to voters every day—by phone and at the doors—to help defeat a dangerous referendum that would make it harder for Mainers to vote. You'll be part of a hardworking, passionate team fighting for our democracy, working in the field across your assigned region. This job is ideal for someone with great people skills, a strong work ethic, and a passion for making a difference in their community. This position reports to MDP's Field Director to start and is a full-time position through the second week of November 2025 with the opportunity to continue working at MDP if the circumstances allow.

Key Responsibilities

- Conduct daily direct voter contact through door-to-door canvassing and phone calls.
- Meet daily and weekly voter contact goals for conversations and data tracking.
- Represent the campaign in your community and serve as the face of our voter outreach program.
- Enter data promptly and accurately after each voter interaction in-line with the best practices established by the MDP's Field Director.
- Work closely with the Field Director and other organizers to share updates and collaborate on regional strategy.

MEDEMS

MAINE DEMOCRATIC PARTY

- Travel frequently within your assigned county and occasionally to nearby areas as needed.
- Assist with events, visibility, and GOTV efforts as the election approaches.

Qualifications

- Strong interpersonal skills and enthusiasm for talking with people.
- Ability to work independently and as part of a team.
- Commitment to the values of the Democratic Party and protecting voting rights.
- Willingness to work weekends when needed.
- Reliable transportation and willingness to travel daily within your assigned county or region.
- Previous campaign, organizing, or community experience is a plus, but not required.
- Experience in customer service, retail, food service, or other people-facing roles is highly valued.

How to Apply

Please send your cover letter and resume to exec@mainedems.org with “Field Organizer - <insert your county>” in the subject line. Applications will be accepted on a rolling basis. Relocation assistance is available if needed.

This is a full-time, temporary position through November 2025, paid at \$22/hour, with overtime eligibility. This position includes a full benefits package and is part of the Maine Democratic Party’s bargaining unit,

MEDEMS

MAINE DEMOCRATIC PARTY

represented by the International Brotherhood of Electrical Workers Local #1837.

These positions are based in Maine and require daily in-person voter contact, including knocking doors and attending local events in your assigned region.

The Maine Democratic Party is an equal opportunity employer and it is our policy and our core value to recruit, hire, train, promote and administer any and all personnel actions without regard to sex, race, age, color, creed, national origin, religion, economic status, sexual orientation, veteran status, gender identity or expression, ethnic identity or physical disability, or any other legally protected basis.



**Bernstein, Shur,
Sawyer & Nelson, P.A.**
100 Middle Street
PO Box 9729
Portland, ME 04104-5029

T (207) 774 - 1200
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Kate R. Knox
Shareholder
207-228-7229 direct
kknox@bernsteinshur.com

December 19, 2025

Via E-Mail

Heidi Hoefler
Political Committee and Lobbyist Registrar
Maine Commission on Governmental Ethics and Election Practices
135 State House Station
Augusta, Maine 04333-0135

Re: Alex Titcomb Complaint Against the Maine Democratic Party

Dear Ms. Hoefler,

We write on behalf of the Maine Democratic Party (MDP) in response to your questions dated November 21, 2025, regarding allegations made by Alex Titcomb about MDP's spending in opposition to Question 1. As an initial factual matter, we note that Mr. Titcomb was the campaign manager for the Yes on 1 campaign.

Before answering your three specific questions, we are providing some additional context and analysis which we hope will be helpful to your assessment.

1. MR. TITCOMB'S ALLEGATIONS

MDP understands that Mr. Titcomb alleges noncompliance with 21-A M.R.S. § 1052-A and related statutes. In his complaint, Mr. Titcomb alleges that MDP was required to register and file reports as a ballot question committee ("BQC") because MDP was active against Question 1.

The majority of Mr. Titcomb's complaints are centered on highlighting the specific spending by MDP which he argues triggers a BQC registration. As noted in his complaint, Mr. Titcomb obtained all his information easily and publicly, specifically from publicly filed campaign finance reports by both DGA Maine and MDP. MDP does not argue it spent less than

\$5,000 on Question 1 – the spending is clear by looking at regularly filed campaign finance reports, including those of DGA Maine BQC. MDP was not hiding its involvement or opposition to the question as voting rights are central to MDP's mission as articulated in their governing Platform.

Mr. Titcomb begins by stating: “Under Maine law, any organization – including a state party committee – that receives contributions or makes expenditures exceeding \$5,000 to initiate or influence a statewide ballot question must register as a BQC...”. MDP disagrees with that statement and argues that Mr. Titcomb is ignoring the Party Committee’s definition under 21-A M.R.S. 1017(A) which allows it to report all candidate and ballot question activities on its Party Committee reports. MDP does not question that ballot question activity must be reported, it simply believes it is accurately reporting that activity on its Party Committee reports.

1. PARTY COMMITTEES

The Maine Democratic Party is a “party” as defined by 21-A M.R.S. § 1. Party committees are unique entities under Maine election law and treated differently from Political Action Committees (“PACs”) and BQCs. Party Committees have specific carve outs from the definition of “contribution” and “expenditure” which acknowledge their unique status.¹ They also comply with reporting as outlined for them in statute.² As part of that reporting, MDP is required by statute to report all expenditures made to influence a campaign, which is further defined as any activity to influence both a candidate election or a ballot measure. 21-1 M.R.S § 1017-A (2). That statutory requirement is what guided MDP to include all its activity related to Question 1 in its regular party committee reports.

2. QUESTION 1

MDP was very engaged in efforts to defeat Question 1 and was reporting that activity in its regular reports. In late September, after an exchange between Commission staff and the Sagadahoc County Democratic Committee, we learned there may be differing views about how MDP should report its Question 1 activity. We reached out to Commission staff, shared our legal analysis, and asked for guidance. Among other things, staff’s response stated, “*I agree that the applicable statute does not require a party committee to separately establish a BQC for ballot question work.*” (See Attachment A).

As a result of that dialogue, MDP continued its activities and its reporting as disclosed to Commission staff in September of 2025.

Given all the above context, we respectfully argue that the questions below are not particularly relevant to the evaluation of Mr. Titcomb’s allegations, but we provide the answers as requested by Commission staff.

¹ 21 M.R.S. § 1012(2)(7-8-A) and 21 M.R.S. § 1012 (3)(7), (10a, 10b, 10c) and (10-A).

² 21 M.R.S. § 1017-A.

3. STAFF QUESTIONS – “ADDRESS WHETHER ANY CONTRIBUTIONS TO THE COMMITTEE WERE EARMARKED FOR EFFORTS TO OPPOSE QUESTION 1 AS ALLEGED IN THE COMPLAINT”

Yes. As publicly disclosed in the DGA BQC reports, four contributions were very clearly made for purpose of opposing Question One.

4. STAFF QUESTIONS – “DESCRIBE ANY EXPENSES INCURRED BY THE COMMITTEE TO OPPOSE QUESTION ONE AS ALLEGED IN THE COMPLAINT AND PROVIDE SOME SENSE OF THE TOTAL AMOUNT OF THESE EXPENSES”

MDP does not argue it made significant expenses to oppose Question One. That included the hiring of six to seven staff members, and an approximate total spend around \$250,000. Other expenses, as disclosed in filings, included literature, and digital advertising – all done with proper disclaimers of “Paid for by the Maine Democratic Party.”

5. STAFF QUESTIONS “IF PEOPLE WERE HIRED FOR THE STAFF POSITIONS REFERRED TO IN THE COMPLAINT, IDENTIFY WHO PAID THEM.”

Any staff hired for the staff positions referred to in the complaint were paid by the Maine Democratic Party and disclosed in their reports. At least one staff member continues their employment with MDP.

CONCLUSION

We appreciate this opportunity to address Mr. Titcomb’s complaint and to provide further context. Because we believe that MDP reasonably interpreted the statute, sought guidance from Commissions staff, and reported all activity on its regular committee reports, we do not believe Mr. Titcomb’s complaint requires further investigation, and we respectfully request no further action be taken.

Sincerely,

/s/ Kate Knox

/s/ Lisa Prosienski

Kate Knox
Lisa Prosienski
Counsel to the Maine Democratic Party

Kate Knox

From: Hoefler, Heidi <Heidi.Hoefler@maine.gov>
Sent: Friday, September 26, 2025 5:20 PM
To: Kate Knox
Cc: Lisa A. Prosienski
Subject: RE: Party Committees and Question 1

EXTERNAL EMAIL

Kate,

Although I did not see a question for me, perhaps a clarification and a bit of context may be useful.

The question I received from the Sagadahoc County Democratic Committee (SCDC) asked for direction about how the local party committee should proceed given a specific set of facts that included a local party committee thinking about producing public communications expressly advocating against a referendum question on the November ballot – would they need to think about registering as a ballot question committee? My response, part of which you copied and pasted below, provided information and potential considerations to help the SCDC think things through and make an informed decision. See wording highlighted in green below. There is no statement in the response I provided to the SCDC that the statute “requires party committees to establish a separate BQC for ballot work”. Again, see wording highlighted in green below – “Although a group is not required to register...you may want to consider registering”. I agree that the applicable statute does not require a party committee to separately establish a BQC for ballot question work. However, consistent with the applicable statute, that sentence I referred to above does include the following wording, “a group is not required to register as a ballot question committee until it raises OR spends more than \$5,000 to influence a ballot question campaign”. 21-A MRS §1052(2-A) defines “ballot question committee” as a “person” (defined in 21-A MRS §1001(3) as an individual, committee, firm, partnership, corporation, association, or organization) 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. Per 21-A MRS §1052-A, if a person meets the definition of ballot question committee, then it must register as a ballot question committee unless there is an applicable exception to the registration requirements.

Heidi

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

From: Kate Knox <kknnox@bernsteinshur.com>
Sent: Friday, September 26, 2025 12:49 PM
To: Hoefler, Heidi <Heidi.Hoefler@maine.gov>; Lisa A. Prosienski <lprosienski@bernsteinshur.com>
Subject: Party Committees and Question 1

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.

Heidi,

Happy Friday! Hope you are well.

Maine Democratic Party (who Lisa and I represent) reached out yesterday to ask for guidance around some correspondence you had with one of their county committees about their postcard expressing an opinion on Question 1. I cut and pasted what they forwarded below just for ease of reference:

Thanks for asking your questions below. As you know, party committees are established to “influence” (defined as promote, support, oppose, or defeat) candidate elections and ballot question committees are set up to influence state or local ballot question campaigns. We understand that a committee such as the Sagadahoc County Democratic Committee, which states that its mission is to elect Democrats, may occasionally use its funds for something other than its primary purpose. However, based on the information you provided below and in the party committee’s 2025 campaign finance report, the amounts that are being spent by the party committee on the ballot question campaign appear to be somewhat substantial given the party committee’s reported cash on hand at the end of June. Although a group is not required to register as a ballot question committee until it raises OR spends more than \$5,000 to influence a ballot question campaign, if the party committee intends to continue to spend the money it raised to influence candidate elections to influence a ballot question campaign or the party committee receives contributions for or fundraises for the purpose advocating a no vote on Question 1, you may want to consider registering a ballot question committee even if you do not hit the \$5000+ registration threshold. Regardless, the party committee should keep track of all contributions received and expenditures made for the purpose of opposing the ballot question so it can timely register if the threshold is hit.

We are hoping to follow up with you about the advice above – as it doesn’t align with our reading of the statute. Our assessment of the law is that party committees are not required to separately establish BQCs for ballot question activity. Under 1017A, party committees are directed to report “all expenditures made to influence a campaign, as defined in 1052, subsection 1. That portion of the statute includes not just candidate campaigns, but both people’s veto’s and direct ballot initiatives. All of this information is contained in the “Reports of contributions and expenditures by party committees” section of the statute which leads to the logical conclusion that ALL activity (candidate and ballot related) are required to be disclosed on the party committee report itself. Just to be clear, all activity related to Question 1 has been and will continue to be disclosed on the regular party committee reports – this is not a question of whether or not the activity is subject to reporting.

We don’t see anything in the statute that requires party committees to establish a separate BQC for ballot work. We disagree with your characterization that party committees are established to influence candidate elections and BQCs are established for ballot questions. Of course, PACs are established to primarily influence candidate elections, but state party committees are not PACs. They are their own political entity, with distinct provisions allowing them to coordinate with candidates (as opposed to PACs) and with distinct reporting forms and timelines.

We were also a bit lost about the “primary purpose” analysis above and how it related to the election law analysis. While very relevant to IRS law, we aren’t aware of how the primary purpose analysis of spending influences registration or reporting for BQCs.

As always, we are very open to feedback – including the possibility we are missing something. As of right now, party committees are doing work to influence Question 1 and are reporting it on their regular party committee reports. If you continue to believe a BQC is required, it would be great to meet and talk about why.

Again, thank you for taking the time to go through this – we always appreciate the staff’s engagement on these real time issues.

Best,

Kate

Kate Knox

she/her/hers pronouns

Shareholder

Legislative and Political Practice Group Leader

207 228-7229 direct

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[My Bio](#) | [LinkedIn](#)

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Confidentiality notice: This message is intended only for the person to whom addressed in the text above and may contain privileged or confidential information. If you are not that person, any use of this message is prohibited. We request that you notify us by reply to this message, and then delete all copies of this message including any contained in your reply. Thank you.

December 26, 2025

Maine Commission on Governmental Ethics and Election Practices
45 Memorial Circle
Augusta, ME 04330

Re: Follow-Up to Formal Request for Investigation into Potential Violations of Maine Campaign Finance Laws by the Maine Democratic Party Related to the 2025 Ballot Question 1 Campaign

Dear Commissioners and Staff:

I write to follow up on my formal complaint dated November 19, 2025, and in response to the December 19, 2025 letter submitted on behalf of the Maine Democratic Party (MDP). I respectfully submit this additional correspondence to ensure that key factual and legal issues raised by MDP's response are not overlooked as the Commission determines whether a formal investigation is warranted in this matter of significant public importance.

1. Registration and Reporting Obligations Under Maine Law

I acknowledge that I am not an attorney and do not claim legal expertise comparable to counsel for the Maine Democratic Party. Nevertheless, I continue to maintain that the Maine Democratic Party—like any other “person” under Maine campaign finance law—was required to register as a ballot question committee upon exceeding the statutory threshold for contributions received or expenditures made to influence Question 1. I look forward to the Commission's determination on this threshold issue.

However, even assuming *arguendo* that the Commission were to credit MDP's position that party committees may report ballot-question activity solely through their regular party committee filings, Maine law still imposes specific disclosure requirements. Under 21-A M.R.S. § 1017-A(4-A)(C), activity undertaken to influence a ballot question must be clearly and properly reported. The Maine Democratic Party has not demonstrated that it made the required disclosures in compliance with this provision. On that basis alone, there is sufficient cause to warrant further investigation into whether MDP failed to meet its statutory reporting obligations.

2. Lack of Transparency and Unresolved Questions Regarding Funding and Expenditures

In its December 19 response, MDP asserts that its contributions and expenditures related to Question 1 are “easily and publicly” ascertainable. This claim is not supported by the public record.

In my original complaint, I raised specific concerns regarding approximately \$150,000 in contributions from DGA Maine to the Maine Democratic Party for the purpose of influencing Question 1. In their response, MDP for the first time discloses that it incurred “an approximate

total spend around \$250,000” opposing Question 1. This disclosure raises significant and unresolved questions, including but not limited to:

- Whether the \$150,000 from DGA Maine is included in this stated total;
- The source or sources of the remaining approximately \$100,000; and
- The specific nature and purpose of expenditures comprising this substantial sum.

None of this information is readily discernible from publicly available campaign finance reports. To my knowledge, no press coverage of Question 1 financing identified the Maine Democratic Party as raising or spending funds to influence the outcome of the ballot measure—precisely because MDP does not appear as a registered ballot question committee or as a reported spender in publicly accessible summaries.

This absence of clear, public disclosure undermines transparency and deprives voters of essential information regarding the sources and uses of funds in a statewide referendum. Such opacity is directly contrary to the purposes of Maine’s campaign finance laws and further supports the need for a thorough Commission investigation.

Conclusion

For the reasons outlined above, I respectfully submit that there remains ample basis for the Commission to open a formal investigation into the Maine Democratic Party’s activities related to the 2025 Ballot Question 1 campaign. Clarifying whether statutory thresholds were crossed, whether reporting obligations were properly met, and whether the public record accurately reflects the true scope of fundraising and spending is essential to maintaining public confidence in Maine’s electoral process.

Thank you for your service to the people of Maine and for your careful attention to this matter. I remain available to provide any additional information the Commission may find helpful.

Sincerely,

Alex Titcomb

Concerned Citizen of Maine



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

To: Commissioners
 From: Jonathan Wayne, Executive Director
 Date: January 20, 2026
 Re: Request to Investigate Maine Democratic Party

Mr. Alex Titcomb has filed a request to investigate the Maine Democratic Party (“MDP”) concerning its 2025 financial activities to oppose Question 1 on the November 4, 2025 ballot, which was a citizen initiative to restrict absentee voting. Mr. Titcomb asserts that the MDP qualified as a ballot question committee because it received and spent more than \$5,000 to oppose Question 1. Therefore, he argues, it was required to register and file campaign finance reports as a ballot question committee. (The ballot question committee statutes are listed in the left column in the table at the bottom of this page.)

In response, the MDP acknowledges that it spent approximately \$250,000 to oppose Question 1 but states that it complied with Maine campaign finance law because it reported its anti-Question 1 financial activities in the regular campaign finance reports it filed as a party committee under a different statute, 21-A M.R.S. § 1017-A. Mr. Titcomb replies that even if those party committee reports were the correct way for the MDP to disclose its anti-initiative activities, the MDP did not file all the required reports and did not clearly designate in its reports which expenditures were made against Question 1.

The major issue of contention in this enforcement matter is:

- Do *both sets of reporting statutes* (ballot question committee and party committee) apply when a party committee raises and spends more than \$5,000 to influence an initiative, or *only the party committee reporting statute*?

Ballot Question Committee Statutes (Title 21-A)	Party Committee Statute (Title 21-A)
§ 1052(2-A) – definition § 1052-A(1)(A-1) - registration § 1059 - schedule for campaign finance reports § 1060 - content of campaign finance reports	§ 1017-A

LEGAL REQUIREMENTS (ETH 55-62)

Campaign finance reporting responsibilities of state party committees

Party committees generally. Political parties are organizations that have met the qualifications in 21-A M.R.S. §§ 301-303 to select their nominees through a primary election and have their party designation listed on the general election ballot. In Maine, political parties have a state committee which must hold a biennial convention. Each qualified party also has municipal committees that must meet periodically for the party to maintain its qualified status. The state party committee may also provide for the establishment of county party committees.

One widespread expectation of party committees is that they advocate for their nominees in general elections. The Election Law, however, does not prevent party committees from influencing referenda and initiatives, which they do occasionally.

Campaign finance reporting responsibilities. Party committees are required to submit campaign finance reports to the Commission pursuant to 21-A M.R.S. § 1017-A, unless they are exempt because they had less than \$1,500 in financial activity during a calendar year. The required contents of the reports are set out in § 1017-A(1)-(3). Among other things, subsection 2 states that “[a] party committee shall report all expenditures made to influence a campaign, as defined in section 1052, subsection 1.” (underlining and italics added for emphasis). The term “campaign” is defined in 21-A M.R.S. § 1052(1) to refer to both candidate and ballot question elections.

Filing schedule in candidate election years. The filing schedule for state party committees is set out in § 1017-A(4-A). Each year they are required to file four quarterly campaign finance reports. During years with primary and general candidate elections, party committees must also file reports 11 days before and 42 days after the primary and general elections.

Filing schedule in other years. In odd-numbered years, *if* a state party committee has received contributions or made expenditures for the purpose of influencing a ballot question election, a special election, or a municipal election, the state party committee must file reports 11 days before and 42 days after that election. The committee would also have to file 24-Hour Reports during the last 13 days before the election if they have transactions over certain thresholds to influence the ballot question. *Id.*

Ballot question committees

Context - what is a ballot question committee? Maine campaign finance law provides for a “ballot question committee” reporting status that applies to an entity or association that raises or spends more than \$5,000 to influence a ballot question. The definition is indented below on this page. In practice, a ballot question committee may be group of individuals or organizations that have associated together to initiate a law (usually called a citizen or direct initiative) or repeal a law enacted by the Legislature (a people’s veto referendum). Sometimes, a pre-existing organization, such as a policy advocacy group or commercial entity will need to register a ballot question committee. The ballot question committee may be incorporated as a nonprofit corporation or LLC, but more often they are unincorporated voluntary associations.

The registration and reporting responsibilities of ballot question committees are similar to political action committees (PACs), except that PACs generally influence candidate elections and ballot question committees influence initiatives and referenda. PACs often are ongoing committees that file campaign finance reports for years. The Commission staff requires each ballot question committee to register for a single initiative, referendum, or bond election, and then disband after terminating financial activity for that election.

Statutory definition. The term “ballot question committee” is defined as follows:

"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 political action committee or an exempt donor.

21-A M.R.S. § 1052(2-A). ETH-58. For the Commission’s reference, “person” is defined broadly in campaign finance law to mean “an individual, committee, firm, partnership, corporation, association or of organization.” 21-A M.R.S. § 1001(3). Campaign” is defined as “any course of activities to influence the nomination or election of a candidate, or to initiate or influence ... [a] people’s veto referendum ...; [a] direct initiative ... ;” or other kind of ballot question 21-A M.R.S. § 1052(1). “Influence” is defined as “to promote, support, oppose or defeat.” § 1052(4-A).

Registration with the Commission. Once a ballot question committee receives contributions or makes expenditures exceeding \$5,000 for the purpose of influencing a ballot question, the committee must register with the Commission. 21-A M.R.S. § 1052-A(1)(A-1). In the registration, the ballot question committee identifies two officers and the initiative/referendum it is influencing, and provides other organizational information about the committee. § 1052-A(2).

Organizational requirements. A ballot question committee must open a campaign account with a bank or credit union and keep certain financial records. §§ 1054(2) & 1057.

Campaign finance reporting. The reporting schedule for ballot question committees is set out in 21-A M.R.S. § 1059(2). Every year, a ballot question committee must file four quarterly reports. § 1059(2)(A). In addition, they must file two campaign finance reports 11 days before and 42 days after the ballot question election which the committee was formed to influence. § 1059(2)(C). During the last 13 days before that election, the ballot question committee must also file 24-hour reports of any large transactions above certain thresholds. § 1059(2)(E).

Standard for initiating an investigation

The Commission is required to review every request to investigate an alleged violation of campaign finance law and to conduct an “investigation if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred.” 21-A M.R.S. § 1003(2).

FACTUAL BACKGROUND

Request by Alex Titcomb for Investigation

Mr. Titcomb was the principal officer of the campaign organization that promoted Question 1. In a November 19, 2025 letter to the Commission, he asks the Commission to investigate whether the MDP disclosed its financial activity to oppose Question 1 as required by Maine campaign finance law. In particular, he questions whether the MDP should have registered and filed campaign finance reports as a ballot question committee. He cites the following activities:

- The MDP received three contributions totaling \$150,000 to oppose Question 1.
- Public job postings suggested that the MDP hired people to canvass households to oppose Question 1 (the compensation was listed as \$22 per hour) and also hired a deputy field director for the campaign to oppose Question 1 (expected compensation was listed as \$60,000).
- The MDP paid for campaign literature which Mr. Titcomb referred to as “palm cards, handouts.” Mr. Titcomb claims this literature was widely distributed through door-knocking. He also cites “large-scale events” involving “thousands of such items” which he estimates necessitated more than \$5,000 in printing and distribution costs.
- The MDP arranged for the production of apparel and buttons opposing Question 1. Mr. Titcomb contends that the MDP should have disclosed any expenditures for these products. If these items were sold online, he says the MDP should have reported the income as contributions.
- The MDP posted graphics and phone-banking communications to social media which Mr. Titcomb contends could have required paid staff or other expenses that should have been reported.

Mr. Titcomb concludes “Given the scale and visibility of these activities, the Maine Democratic Party’s apparent failure to register [as] a [ballot question committee] or file separate ballot-question reports has deprived the public of critical transparency into the sources and uses of funds during a high-profile referendum.” He requests a thorough investigation of the MDP’s activities to determine whether it complied with all registration and reporting requirements, including any missed 11-day pre-election report or 24-hour reports.

Response by the Maine Democratic Party

The MDP responded to Mr. Titcomb’s request through a December 19, 2025 letter from its attorneys, Kate R. Knox and Lisa Prosienski. The MDP states that it received four contributions for purposes of opposing Question 1 from a ballot question committee, DGA Maine. (Commission staff could find only three such contributions.) It also acknowledges that it paid staff and spent money on printed literature and digital advertising to oppose the initiative. The MDP does not mention the other potential contributions or expenditures cited by Mr.

Titcomb, such as purchases and sales of apparel or buttons, and any costs for phone banking or social media.

The MDP responds that it disclosed the contributions it received and expenditures it made for purposes of Question 1 in the regular campaign finance reports that it filed as a state party committee. The MDP explains it was guided by 21-A M.R.S. § 1017-A, which “allows [a party] to report all candidate and ballot question activities on its Party Committees reports.” ETH-16. The MDP disagrees that it was required to register and file campaign finance reports as a ballot question committee. The MDP’s attorneys also refer to a September 26, 2025 email exchange between them and Political Committee and Lobbyist Registrar Heidi Hoefler, discussed below. The MDP argues no further investigation is necessary because it reasonably relied on statute, sought guidance from the Commission, and reported all activity on its regular committee reports.

Reply by Alex Titcomb

Mr. Titcomb submitted a reply dated December 26, 2025. He maintains that the MDP – like any other “person” under Maine campaign finance law – was required to register and file reports as a ballot question committee after exceeding the \$5,000 threshold. He also asserts that, even if the MDP were allowed to disclose its ballot question committee activity only in its regular campaign finance reports as a state party committee, the MDP did not file campaign finance reports 11 days before and 42 days after the November 4, 2025 election, as required by 21-A M.R.S. § 1017-A(4-A)(C). He states that the specific nature and purposes of the MDP’s expenditures against the initiative are not discernible from its quarterly campaign finance reports.

Reporting by Maine Democratic Party

The MDP filed four quarterly reports to disclose its 2025 financial activities:

	End of Report Period	Deadline
April Quarterly Report	3/31/2025	4/10/2025
July Quarterly Report	6/30/2025	7/15/2025
October Quarterly Report	9/30/2025	10/6/2025
January Quarterly Report	12/31/2025	1/15/2026

The October and January Quarterly Reports are attached for your reference. ETH 23-54. The Commission staff recommends scanning those reports to evaluate Mr. Titcomb’s claim that the

expenditures made by the MDP for the purpose of opposing Question 1 cannot be identified. (In addition, the MDP filed reports in January-February 2025 related to a special election.)

September 26, 2026 Email Correspondence with Commission Staff

In the letter-response submitted by the MDP's attorneys, they cite an e-mail exchange between Kate Knox and the Commission's Political Committee and Lobbyist Registrar, Heidi Hoefler, on Friday, September 26, 2025. In that email, Ms. Knox expressed her reading of Maine campaign finance law, which is that party committees are to report all expenditures made to influence a ballot question campaign in their regular campaign finance reports filed under 21-A M.R.S. § 1017-A and are not required to register and file reports as a ballot question committee, which is a separate reporting status.

Ms. Hoefler responded at 5:20 p.m. and reiterated advice she had given three days earlier to the Sagadahoc County Democratic Committee which asked whether it needed to register as a ballot question committee if it engaged in ballot question activity to oppose Question 1. If you would like to delve into it, the email correspondence is attached for your reference. Ms. Hoefler did not provide "guidance" that party committees that influence ballot questions categorically do not need to register and report as a ballot question committee. Ms. Hoefler stated that under the applicable statute "a group is not required to register as a ballot question committee until it raises OR spends more than \$5,000 to influence a ballot question campaign" and that per 21-A M.R.S. § 1052-A, if a "person" meets the definition of ballot question committee, then it must register as a ballot question committee unless there is an applicable exception to the registration requirements.

EXECUTIVE DIRECTOR'S RECOMMENDATION

This matter presents conflicting views as to how Maine campaign finance law should be applied when a state party committee receives contributions or makes expenditures over \$5,000 to influence a ballot question:

- The MDP argues that it is sufficient for that financial activity to be reported in its regular campaign finance reports under 21-A M.R.S. § 1017-A.

- Mr. Titcomb contends the MDP qualified as a ballot question committee (§ 1052(2-A)), and therefore should have additionally registered and filed reports as a ballot question committee. §§ 1052-A(1)(A-1) & 1059(2).

After reviewing the statutes, my own opinion is that one can understand the logic of both positions. If the Commission finds it acceptable, the staff would like to postpone offering any recommendation about how the law should be applied until after the full facts are obtained through an investigation.

Grounds for investigating a possible violation of party committee disclosure requirements

Mr. Titcomb has raised a reasonable point that the MDP may have been required to file campaign finance reports as a state party committee 11 days before and 42 days after the November 4, 2025 election, which it did not. Generally, in an odd-numbered years, if PACs, party committees, and ballot question committees are receiving contributions or making expenditures to influence a ballot question, special election, or municipal election, they are required to file a campaign finance report 11 days before and 42 days after that election. That requirement for state party committees is listed in the following italicized text on the next page:

4-A. Filing schedule. A state party committee shall file its reports according to the following schedule. All reports required under [paragraphs A, B and C](#) must be filed by 11:59 p.m. on the day of the filing deadline.

§§§

A. A state party committee shall file quarterly reports:

- (1) On January 15th, which must be complete up to December 31st;
- (2) On April 10th, which must be complete up to March 31st;
- (3) On July 15th, which must be complete up to June 30th; and
- (4) On October 5th, which must be complete up to September 30th.

B. During any year in which primary and general elections are held, a state party committee shall file primary and general election reports in addition to the reports required under [paragraph A](#):

- (1) On the 11th day before the date on which the election is held, which must be complete up to the 14th day before that date; and
- (2) On the 42nd day after the date on which the election is held, which must be complete up to the 35th day after that date.

C. In an election year other than a year described in paragraph B, if a state party committee has received contributions or made expenditures for the purpose of influencing a ballot question election, a special election or a municipal candidate or referendum election subject to Title 30-A, section 2502, the committee shall file preelection and post-election reports:

(1) On the 11th day before the date on which the election is held, which must be complete up to the 14th day before that date; and

(2) On the 42nd day after the date on which the election is held, which must be complete up to the 35th day after that date.

§ 1017-A(4-A)(C). Mr. Titcomb is correct that the MDP did not file campaign finance reports 11 days before and 42 days after the November 4, 2025 election. It filed only quarterly reports. Consequently, the final campaign finance report filed by the MDP before the vote on Question 1 only covered activity through September 30, 2025, which seems insufficient for an organization that spent \$250,000 to oppose the question.

Also, after reviewing the MDP’s October and January quarterly reports, it may be reasonable to fault the MDP for not designating *any* of its expenditures as opposed to Question 1. The party committee reporting statute requires: “A party committee shall report “*all expenditures made to influence a campaign*, as defined in section 1052, subsection 1.” 21-A M.R.S.

§ 1017-A(2) (emphasis added). This implies that the state party committee must identify the campaign that was influenced by an expenditure. After reviewing the MDP’s October and January Quarterly reports, the Commission staff cannot find any expenditures that were designated as opposing Question 1.

This designation *was* possible in the eFiling system that the Commission retired on January 16, 2026. When a party committee entered an expenditure in that system, the party committee was prompted to indicate if the expenditure was to support or oppose a candidate or ballot question, and - if ballot question was selected – select the initiative or referendum from a drop-down list and state the party committee’s position (support or oppose). While the MDP may have had a reason for not making this designation, the Commission staff believes further investigation is necessary to verify whether its reporting was fully compliant. We agree with Mr. Titcomb’s overall point that a member of the public could read the MDP’s October and January quarterly reports and not discern how much it spent to oppose Question 1. Commission members may assess this by reviewing the October and January campaign finance reports. ETH 23-54.

Grounds for investigating a possible violation of ballot question committee disclosure requirements

Mr. Titcomb contends that the MDP qualified in 2025 as a ballot question committee with respect to Question 1 because it met the following definition:

"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 political action committee or an exempt donor.

21-A M.R.S. § 1052(2-A). ETH. Commission staff believes Mr. Titcomb's argument should be taken seriously. The ballot question committee statutes¹ support his argument if they are read in isolation of the party committee reporting statute, 21-A M.R.S. § 1017-A. When the two sets of statutes are read together, however, the Commission staff has difficulty fully accepting Mr. Titcomb's argument. Why would the Legislature set up a duplicative reporting regime in which party committees would need to report their initiative-related financial transactions *both* in ballot question committee reports *and* party committee reports?

Conclusion

In summary, the Commission staff believes Mr. Titcomb's request shows sufficient grounds for believing a violation *may* have occurred. Accordingly, we recommend directing staff to conduct an investigation to understand the full extent of the MDP's financial and political activities to oppose Question 1 and to report back a recommendation by staff on whether the MDP violated either the ballot question committee or party committee disclosure requirements. If we can conduct the investigation expeditiously, our tentative plan would be to write up a staff memo addressed to the Commission providing the staff's recommendation by March 2-4. We would transmit the memo to the MDP and Mr. Titcomb at that time. The MDP would be encouraged to respond to the staff memo in writing by March 17. The staff memo, MDP response, and any comments by Mr. Titcomb would be included in the meeting packet for the Commission's consideration at its March 25, 2026 meeting. That is our proposal, but we are happy to follow any other direction the Commission would like.

¹ §§ 1052(2-A) (definition), 1052-A(1)(A-1) (registration), and 1059(2) & 1060 (campaign finance reporting)

Memorandum

To: Jonathan Wayne

From: Kate Knox and Lisa Prosienski

Date: January 27, 2026

RE: **Maine Democratic Party/Ballot Questions – Supplemental Information**

Dear Mr. Wayne,

Prior to the Commission's consideration of this matter on Wednesday, we felt it important to respond to Mr. Titcomb's second filing and the staff memorandum – albeit briefly.

We strenuously object to the staff's recommendation that an investigation be conducted into whether the Maine Democratic Party ("MDP") should have registered and reported as a Ballot Question Committee ("BQC"). Our objections rest on two primary points:

- 1. Whether or not MDP should register as a BQC is a question of statutory interpretation, which is determined by examining the plain language of the statute, not the facts of a particular situation.***

The question of whether MDP should register as a BQC does not turn on MDP's activities during the campaign, it turns on the Commission's interpretation of the statutory definitions at issue. Courts have long held that statutory interpretation begins with the plain language of the statute, in context of the statute, to determine the meaning while avoiding absurd, illogical or inconsistent results. *Fair Elections Portland, Inc. v. City of Portland*, 2021 ME 32 § 22, 252 A.3rd 504.¹ While the statute states an investigation is appropriate if "the reasons state for the

¹ "We look first to the plain language of [a] statute to determine its meaning if we can do so while avoiding absurd, illogical, or inconsistent results." *State v. Conroy*, 2020 ME 22, ¶ 19, 225 A.3d 1011. As part of the plain-language analysis, "we consider the [specific] language in the context of the whole statutory scheme," *Chadwick-BaRoss, Inc. v. City of Westbrook*, 2016 ME 62, ¶ 11, 137 A.3d 1020

request show sufficient grounds for believing that a violation may have occurred,” it is also logical to assume that there must be information to be discovered which would be relevant to the determination. 21-A M.R.S. § 1003(2). In this case, the issue of whether a “violation may have occurred” has nothing to do with the specific activities of MDP, but rather whether the Commission supports the statutory interpretation laid out by MDP or by Mr. Titcomb. The Commission is in possession of all the facts it needs to make a determination.

As a reminder, we believe that MDP’s interpretation of the statute was reasonable based on the plain language of the statute and the related legislative history. In sum:

- Party Committees are unique entities who are treated differently than PACs and BQCs (i.e. different reporting deadlines, exceptions to contribution and expenditure rules, etc).
- Party Committee reporting requires disclosure and reporting of “all expenditures to influence a campaign” which includes any course of activities to influence a candidate or ballot question. That expectation is supported by Commission staff’s statement that there is a drop-down box in party filings which allow filers to choose if the expenditure was made in support or opposition to a ballot question.² There is simply no question that ballot question expenses are required on party reports.
- Because the statute requires MDP to report all its ballot question expenditures on its party committee reports, it is reasonable and logical to conclude it did not have to double report by forming a parallel entity to report the same expenditures. Determining otherwise would lead to “absurd, illogical and inconsistent results” *Id.*
- Legislative history also indicates that the intention of 21-A M.R.S. §1017-A is to explicitly state that MDP must disclose all expenditures for ballot questions. In 2019, that definition was amended to add “ballot question committee” to clarify that a party committee must report expenditures made in support of a ballot question. When testifying in support of the change, written testimony highlighted that “Party Committees are required to disclose all expenditures made to influence ‘a campaign’ (a candidate or ballot question election), including contributions to a candidate, another party committee or a PAC.” (*see attached testimony on LD 1721, pages 4 and 10*). Further, testimony stated “[t]he Commission proposes inserting the term “ballot question committees” and “[t]he term ‘ballot question committee’ should be added for completeness. It appears that the intention was to clarify that a party is required to disclose expenditures in support of a ballot question and to a ballot question committee, as the statute now currently reads.

(alteration omitted) (quotation marks omitted), and “examine the entirety of the statute, giving due weight to design, structure, and purpose as well as to aggregate language,” *Dickau v. Vt. Mut. Ins. Co.*, 2014 ME 158, ¶ 22, 107 A.3d 621 (quotation marks omitted). *Id.*

² That drop down menu does not appear if a filer is bulk uploading their data, which is how MDP files its reports.

- Finally, Maine election law does not require double reporting (two separate entities reporting the exact same information) in any other situation as it's confusing to the public and overly burdensome on filing organizations.
2. ***MDP reasonably relied on staff guidance, which while not binding on the Commission, should weigh heavily in favor of MDP.***
- In late September, MDP (through its attorneys) reached out to Commission staff to express concern about reporting advice given to the Sagadahoc County Democratic Committee (a registered county committee) regarding its potential involvement in Question 1. The advice given to SDCC was confusing and MDP responded with a lengthy email outlining its concerns and being very clear that *“as of right now, party committees are doing work to influence Question 1 and are reporting it on their regular party committee reports. If you continue to believe a BQC is required, it would be great to meet and talk about why.”* ETH 19 and 20.
 - Staff responded by saying *“... I did not see a question for me.”* ETH 18
 - Staff goes on to state *“...although a group is not required to register...you may want to consider registering” I agree that the applicable statute does not require a party committee to separately establish a BQC for ballot question work.”*
 - Staff then goes on to make a confusing statement stating the definition of a ballot question committee. When trying to assess the meaning of the email, MDP logically relied on the clear and direct statement from staff which said that MDP was not required to establish a BQC.
 - MDP was always clear about its activities and asked staff to verify its reading of the statute. Despite a confusing exchange, it was appropriate for MDP to rely on the clear statement that *“...the applicable statute does not require a party committee to separately establish a BQC for ballot question work.”*
 - While staff interpretations are not binding on the Commission, they are an indication of good faith on the part of MDP and combined with a logical reading of the statute – support not moving forward with an investigation related to BQC formation.

Thank you for the opportunity to provide additional information.



STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS
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**Testimony of Jonathan Wayne, Executive Director of the
Commission on Governmental Ethics and Election Practices
before the Joint Standing Committee on Veterans and Legal Affairs
May 15, 2019**

Senator Luchini, Representative Schneck, and distinguished members of the committee: my name is Jonathan Wayne, and I am the Executive Director of the Maine Commission on Governmental Ethics and Election Practices. Thank you for the opportunity to testify in support of L.D. 1721.

L.D. 1721 is the Commission's "agency" bill, which is intended to address some issues that have come up in the last few years. This written testimony highlights three issues in the bill for the public hearing. A two-column summary is attached (four pages), along with a longer section-by-section explanation of the bill.

Authority to investigate complaints concerning residency of Maine Clean Election Act candidates. (Sec. 30-31) The Commission seeks authorization to investigate complaints that a Maine Clean Election Act (MCEA) candidate for the Legislature is not a resident of the district which the candidate is seeking to represent.

Payments of MCEA funds to a candidate's spouse or domestic partner, or a related business. (Sec. 32) The Commission proposes that MCEA candidates could not use MCEA funds to purchase campaign goods or services from the candidate's spouse or domestic partner, or a business owned by the candidate or the candidate's spouse or domestic partner. Under current law, these payments are allowed if the goods or services are for a legitimate campaign-related purpose; the

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payee regularly provides the goods or services in the normal course of their occupation or business; and the cost is reasonable. The Commission is concerned that payments to the candidate's spouse or domestic partner, or businesses owned by them, could appear to be self-serving, even if the goods or services are legitimate and reasonably priced.

Alternative procedure for collection of qualifying contributions in cash. (Sec. 28) The Commission proposes an alternative procedure for candidates seeking MCEA certification to document that they received a \$5 qualifying contribution in cash. The Commission's proposal, which is based on a 2017 bill by Sen. David Miramant in the 128th Legislature (LD 585), is that the candidate could use the cash collected from multiple contributors to purchase *a single money order* or cashier's check for the amount collected to be submitted to the Commission.

Thank you for your consideration of this bill.

Short Summary of LD 1721 – Ethics Commission Agency Bill

	Proposed Change in Law	Rationale for Proposal
1	Under current law, Commissioners may serve two terms. Each term has a maximum length of three years, suggesting an intention for Commissioners to be able to serve for six years. In practice, however, the first term of some Commissioners can be much shorter when they are filling a vacancy (sometimes just a few months). The Commission proposes that if a Commissioner's first term is less than two years, that period would <i>not</i> count as the Commissioner's first term for purposes of the two-term limitation.	The rationale is for each Commissioner to be able to serve at least five or six years in total, if they would like.
2	The bill would expand the definition of "election" in Maine's campaign finance law (Title 21-A, Chapter 13) to include ballot question elections – not just candidate elections.	Chapter 13 of the Election Law applies to both candidate and ballot question elections. The definition of "election" should correspond to the actual coverage of Chapter 13.
3	Current law requires the Commission to keep certain investigative documents confidential, but the Commission may release them if they are "materially relevant to a finding of fact, violation or other decision."	The proposed change would clarify that the Commission has the discretion to release a memorandum or report by the Commission staff <u>even before</u> the Commission makes a finding of fact, violation or other decision. Public access to a staff memo or report can be important to the public's understanding of the enforcement matter.
4	The bill would modify the information that state party committees must provide to the Commission every two years concerning municipal and county party committees (e.g., the Bangor Republican Committee or the York County Democratic Committee). The Commission proposes to receive the contact information in June after the caucuses, and to receive contact information specifically for the committee chair and treasurer.	Party committees organized at the town and county level are required to file two or three campaign finance reports per year, if they raise or spend more than \$1,500. The Commission sends reminder postcards to all local party committees of filing deadlines, even though most are exempt.
5-6	Section 1014 requires that certain paid communications to voters concerning candidates must include a statement of who paid for the communication and whether a candidate authorized the communication. The Commission proposes modifying the time periods before an election when communications that merely name or depict a candidate must contain this information.	The Commission proposes that the disclosure be required for any paid communication naming or depicting a candidate disseminated to voters within 28 days before a primary election and between Labor Day and the general election. These time periods are consistent with changes to the independent expenditure reporting statute that were approved by Maine voters in the 2015 citizen initiative.
7-8	The Commission proposes that candidates who are unopposed in an election would <u>not</u> have to file a 24-Hour Report of contributions or expenditures of \$1,000 or more during the 13 days before an election.	Because most general elections are opposed, this proposal (if enacted) is most likely to have an effect in <i>primary elections</i> for legislative and county office. The larger pre-election transactions in the regularly scheduled report due 42 days after the primary election.
9	Candidates would be required to include the addresses of their vendors in campaign finance reports – similar to the requirements for PACs, state and local party committees, and ballot question committees.	Under current law, candidates are required to report the name of their vendors, but not their addresses. Some candidates purchase goods and services from vendors in other parts of the United States, or from individuals or businesses that are hard to pin down by name only. Around 60% of legislative candidates participate in the Maine Clean Election Act program and it is important to understand how they have spent their public campaign funds.

10	After an election, a traditionally financed candidate could spend surplus campaign funds on a recount election.	Candidates may rarely need to spend their own campaign funds for a recount, but the question has arisen in questions from candidates. MCEA candidates could not spend campaign funds on a recount.
11	Party committees are required to disclose all expenditures made to influence "a campaign" (a candidate or ballot question election), including contributions to a candidate, another party committee or a PAC. The Commission proposes inserting the term "ballot question committees" and deleting	The term "ballot question committee" should be added to the statute for completeness. The Commission recommends deleting the term "political committee," because that term is not defined in campaign finance law.
12	Clarifies the filing schedule for state party committees. They must file quarterly campaign finance reports every year. In a candidate election year, the 11-day pre-election and 42-day post-election reports would be required for both the primary and general elections. In other years, the 11-day pre-election report and 42-day post-election report would be required for special elections and ballot question elections only if the state party committee received or spent money to influence that election.	These statutory changes are intended to codify current practice, and not change the current schedule.
13	Municipal and county party committees would not be required to file 24-Hour Reports during the 13 days before a <i>primary</i> election.	Local parties would continue to file 24-Hour Reports before a general election, if the committee received a contribution of \$5,000 or more or made an expenditure of \$1,000 or more.
14	In 2001, the Legislature adopted a requirement that if a membership organization (business association or trade union) spends more than \$50 to expressly advocate for or against a candidate, the organization needs to file a one-time financial report. The Commission staff recommends an incremental change in the spending threshold to \$100 per candidate.	The threshold of spending \$50 to influence a candidate's election is one of the lower thresholds for filing a campaign finance report, and significantly lower than the \$250 threshold for filing an independent expenditure report. Goods or services with a value of \$50 in September 2001 were worth \$72 in April 2019.
15	Under the current law, a paid communication to voters after Labor Day that names or depicts a clearly identified candidate is <i>presumed</i> to be an independent expenditure, which requires the filing of a campaign finance report. The spender may try to rebut the presumption within 48 hours of the expenditure by presenting evidence that the spender did not intend to influence the election.	To provide a more reasonable opportunity for this rebuttal procedure, the Commission proposes changing the deadline for submitting the rebuttal statement to within 48 hours of disseminating the communication – rather than within 48 hours of incurring an obligation or expenditure for the communication (which can occur days or weeks before the communication is disseminated to voters).
16	Increases the penalty for not registering as a candidate from \$10 to \$100.	It is reasonable to expect individuals seeking public office to file a simple form with contact information and identify a treasurer and any other officers. Some candidates do not register, even after multiple contacts by the Commission. The current penalty of \$10 has little punitive value.

17 & 24	Clarifies the maximum penalty if a PAC, party committee or ballot question committee does not submit a substantially correct campaign finance report on time containing more than \$50,000 in contributions or expenditures.	The maximum penalty under current law is 100% of the amount that was not reported on time. The Commission seeks to confirm that if a report that is not substantially complete (<i>e.g.</i> , misstates the contributors), the maximum penalty is the same as though the report was filed late.
18-19	Fixes the description of coverage of Chapter 13, Subchapter 4 to relate to both political action committees and ballot question committees.	The description of coverage and definition should be updated to include ballot question committees. They are organizations that have a pre-existing purpose and that spend more than \$5,000 to influence a Maine election (<i>e.g.</i> , a national advocacy organization, or Maine trade group or labor association).
20-21	Under current law, certain types of paid communications to voters to influence a ballot question must contain a statement of who financed the communication. The Commission proposes that paid telephone calls should be subject to this requirement and a penalty of up to \$5,000 for the missing disclosure.	When the statute was enacted in 2013, telephone calls were not covered by the statute, and no penalty was prescribed.
22	Current law contains an exception for donors that make contributions to a PAC or BQC. The Commission proposes to clarify this donor exception by moving it to its own sentence near the end of the first paragraph of the section.	The Commission seeks to avoid a legal interpretation that an organization is not required to register with the Commission even if it had raised contributions to influence a ballot question election as long as it donates those funds to a PAC or BQC.
23	Clarifies the filing schedule for PACs (please see section 12).	The filing schedule for PACs would be the same as for state party committees.
24	Please see description for sec. 17 above.	
25	Modifies the definition of qualifying contribution (QC) in the Maine Clean Election Act to acknowledge that candidates collect QCs in cash (in addition to check or credit card)	The Maine Clean Election Act (MCEA) and Commission procedures have allowed QCs by cash, since the program began in 2000.
26	The MCEA requires candidates to file a "declaration of intent" (a one-page form) once they decide to qualify for public campaign funding. Under current law, if a candidate were to collect QCs before filing the declaration of intent, the QCs are valid only if collected during a short window of time: five business days before the filing of the declaration of intent.	The Commission proposes that the same restriction apply to additional qualifying contributions collected to qualify for supplemental payments of MCEA funds.
27	Changes the term "participating candidate" to "certified candidate" in seed money statute.	Candidates who have qualified for MCEA funds ("certified candidates") may not use those funds to pay for goods and services received before they qualified for MCEA funding.
28	Reorganizes the subsection of the MCEA relating to qualifying contributions. Introduces an alternative procedure for collecting QCs in cash.	MCEA candidates could use cash collected from multiple contributors to purchase a single money order or cashier's check to submit to the Commission.
29	Clarifies that the same procedures for collecting qualifying contributions to receive <i>initial payments</i> MCEA funding also apply to collecting additional qualifying contributions to qualify for <i>supplemental payments</i> .	The procedures for collecting QCs and additional qualifying contributions are essentially the same.

30 (1 st ¶), 31	Directs the Commission to establish a receipt and acknowledgement form for voters to confirm that they made a QC. A QC would not be valid if someone other than the contributor signs the form, except under special conditions.	The Commission has used versions of this form since the MCEA program began in 2000.
32	Maine Clean Election Act candidates could not use MCEA funds to purchase campaign goods or services from the candidate's spouse or domestic partner, or a business owned by the candidate or the candidate's spouse or domestic partner.	Under current law, these payments are allowed if the goods or services are for a legitimate campaign-related purpose; the payee regularly provides the goods or services in the normal course of their occupation or business; and the cost is reasonable. The Commission is concerned that payments to the candidate's spouse or domestic partner, or a related business, could be viewed by the public as self-serving, even if the goods or services are for legitimate campaign goods and services.
33	The Commission proposes a change in terminology.	The statute which governs when additional qualifying contributions may be collected should refer to "certified candidates" in addition to "participating candidates."

**Section-by-Section Summary of LD 1721 –
Ethics Commission Agency Bill**

Sec. 1. Terms of Commissioners (1 M.R.S.A. § 1002(1-A)(D))

Current law. Members of the Ethics Commission may serve two terms. Each term has a maximum length of three years, which suggests an intention that Commissioners should be able to serve for six years. In practice, however, the first term of some Commissioners (when they are filling a vacancy) can be much shorter – sometimes just a few months. The result is that Commissioners sometimes serve much less than six years. For example:

First Term	Second Term	→	Result
5 months	3 years		Commissioner serves total of 3 years, 5 months.

Commission proposal. The Commission proposes an amendment to make sure that Commissioners serve at least five years. The Commission’s proposal is that if a Commissioner’s first term is less than two years, that period would not count as the Commissioner’s first term for purposes of the two-term limitation. For example:

Filling Vacancy	First Term	Second Term	→	Result
5 months	3 years	3 years		Commissioner serves total of 6 years, 5 months.

Sec. 2. Correcting the definition of “election” to include ballot questions (21-A M.R.S. § 1001(2))¹

The Commission proposes modifying the definition of “election” for Chapter 13 of the Election Law. This is intended as a clarification and would not change the Commission’s jurisdiction or activities.

Chapter 13 relates to both candidate and ballot question elections, but the definition of election in section 1001(2) refers only to “any ... election for state or county office or municipal office” and excludes ballot questions. The Commission proposes expanding the term to include “any referendum”, which is defined in 21-A M.R.S. § 1(36) to mean

¹ Below, references to sections of the Maine Revised Statutes are to the Election Law (Title 21-A), unless otherwise noted.

“an election for the determination of a question.” This would be more consistent with the duties currently assigned to the Commission under Chapter 13.

FYI – Under 30-A M.R.S. § 2502, the state’s campaign finance law applies to towns and cities with a population of 15,000 or more. In those municipalities, candidates, PACs and ballot question committees (BQCs) must register and file campaign finance reports similar to legislative elections, except that the registrations and reports are filed with the municipal clerk, rather than the Commission.

Sec. 3. Ensuring the Commission may release memos and reports by the Commission staff (§ 1003(3-A))

Since 2008, the Commission has been authorized under § 1003(3-A) to keep certain documents confidential when conducting investigations in enforcement matters. The statute covers financial information of those outside the Commission (*e.g.*, candidates, political parties, or PACs), but also “intra-agency communications” between employees and members of the Commission (*e.g.*, memos, emails, reports).

When the Commission is conducting an enforcement matter at a public meeting, it is important for the public to have access to the facts and the law that the Commission is considering, which is typically laid out in a memo or report by the Commission staff to its members.

The Commission proposes a change in the confidentiality provision (§ 1003(3-A)) to clarify that the Commission has the discretion to release a staff memo or report (and related documents) *prior to* a finding of fact or conclusion of law by the Commission. The subject of the investigation whose information would be made public would be provided with an opportunity to see the memorandum before its release and to assert any claims of privilege or confidentiality. Any such claims could be addressed through redactions.

For years, the Commission assumed that it had this discretionary authority, but it was challenged in 2017 by the respondents in the York County casino matter.

Sec. 4. Obtaining contact information for town and county party committees (§ 1013-A(3))

Under current law, state party committees provide names and addresses of the officers of their municipal and county party committees to the Commission in April of the election year (*e.g.*, the Falmouth Republican Town Committee, or the Kennebec County Democratic Committee). The Commission uses this list to send reminder postcards to the officers two or three times per year, before each filing deadline. Many

of these party committees have no idea they might have to file a campaign finance report if they raise or spend more than \$1,500 in a calendar year.

The Commission proposes moving the date of that annual list to June 15th to be after the caucuses and state conventions, and the party would specifically provide the contact information for the chair and treasurer of each committee.

Sec. 5 & 6. Paid communications to voters close to an election (§§ 1014(2-A) & (5))

Section 1014 requires that paid communications to voters concerning candidates must include a statement of who made the expenditure for the communication and whether a candidate authorized the communication. Subsections 1 and 2 relate to communications that expressly advocate for the election or defeat of a candidate. Subsections 2-A and 5 require the “paid for and authorized by” statement during limited time periods before a primary, special, or general election for communications that merely name or depict a clearly identified candidate.

The 2015 citizen initiative expanded similar time periods in the independent expenditure reporting statute (§ 1019-B(1)(B)) that control when non-express advocacy communications to voters are presumed to be independent expenditures and require a financial report to the Commission. The Commission proposes that the time periods in §§ 1014(2-A) and (5) be expanded to be consistent with § 1019-(1)(B).

Sec. 7 & 8. Clarifies that a 24-Hour Report is not required for a candidate who is unopposed in an election (§ 1017(2))

Some candidates find it burdensome to file 24-Hour Reports during the last 13 days before an election. A 24-Hour Report is required if a candidate receives a contribution of \$1,000 or more or makes an expenditure of \$1,000 or more during this period. If a candidate misunderstands or forgets this requirement, the candidate can be assessed a penalty for not filing a 24-Hour Report on time.

The Commission proposes that a candidate who does not have an opponent in an election would not be required to file 24-Hour Reports in the last 13 days before that election. The candidate would disclose these larger contributions or expenditures in the regular report due 42 days after the election. (Most often, this would apply in a primary election where a party candidate does not have an opponent.)

Sec. 9. Requiring candidates to report an address for their payee (§ 1017(5))

In campaign finance reports filed with the Commission, PACs, BQCs and party committees are required to disclose the name and the address of each payee. Candidates have not been required to report the address, only the name.

The Commission proposes that candidates be required to report the addresses of the payees that sold goods or services to the candidates. Around half of the candidates for the Legislature participate in the Maine Clean Election Act program, and it is important to understand how they have spent their public campaign funds. Some candidates purchase goods and services from vendors located outside Maine, or from individuals or businesses under assumed names that are hard to identify. Within Maine, there are dozens of post offices and retail stores with the same name but different locations.

Due to an update in the Commission's electronic filing system in 2014, the online forms used by candidates to enter contributions called for them to enter an address for their payees. Almost all candidates entered an address in 2014, 2016, and 2018 without questioning it.

Sec. 10. Allowing traditionally financed candidates to use surplus funds for recount expenses (§ 1017(8))

Section 1017(8) requires candidates to dispose of unspent campaign funds within four years of the election for which the funds were raised. This statute applies only to traditionally financed candidates who have raised campaign contributions and not to Maine Clean Election Act candidates.

The Commission proposes acknowledging that the candidate (rather than the campaign treasurer) will more often be the person making the post-election decision of how to dispose of surplus funds. In response to questions from candidates, the Commission proposes permitting candidates to spend surplus funds for recounts. This proposal may rarely be needed, because candidates do not necessarily need to incur any expenses for a recount, as legal representation is sometimes provided to candidates by their political parties.

 **Sec. 11. Expenditures reported by party committees (§ 1017-A(2)(A))**

Party committees are required to disclose all expenditures made to influence "a campaign" (e.g., a candidate or ballot question election), including contributions made by the party committee to a candidate, PAC, or another party committee. The Commission proposes inserting the term "ballot question committees" in the list of payees that must be disclosed. The Commission suggests deleting the term political committee, which is not defined in the campaign finance law (Chapter 13 of the Election Law).

Sec. 12. Filing schedule for state party committees (§ 1017-A(4-A))

In sections 12 and 23, the Commission proposes statutory changes to clarify the filing schedule for state party committees and PACs. The Commission is not seeking to change the current filing schedules. Rather, we are attempting to clarify the statutory language to reflect current practice. These changes would also affect BQCs, which by statute are under the same filing deadlines as PACs.

Paragraph A – state party committees would need to file quarterly reports every year.

Paragraph B – in a candidate election year, state party committees would also file reports 11 days before and 42 days after the primary and general elections.

Paragraph C – in an odd-numbered year, state party committees would file the 11-day and 42-day reports only if the state party were raising or spending money to influence a special election, a ballot question election, or a municipal election in a town or city with a population of 15,000 or more.

Paragraph D – in a candidate election year, state party committees would file 24-Hour Reports before each primary and general election. (Please note that the reports would be required before a primary or general election even if the contribution or expenditure was not for the purpose of influencing the election.) During odd-numbered years, the 24-Hour Reports would be required only if the state party committee were spending money to influence an election in that year.

Sec. 13. No 24-Hour Report for municipal and county party committees for a primary election (§ 1017-A(4-B))

The Commission proposes a clarification that municipal and county party committees (*e.g.*, the Cumberland County Democratic Committee, or the Bangor Republican Committee) would be required to file 24-Hour Reports only for the general election, and not for a primary election. (If these committees raise and spend less than \$1,500 per year, no reports are required whatsoever.)

Sec. 14. Spending threshold to require a membership organization to file a campaign finance report (§ 1019-A)

Some membership organizations, such as business associations, labor unions, and trade associations, communicate with their members concerning political candidates. Communications from a membership organization to its members are exempt from the definition of "expenditure" in the Election Law (21-A M.R.S.A. §§ 1012(3)(B)(3) & 1052(4)(B)(3)). That means that the organizations do not need to form PACs or file

independent expenditure reports based on their advocacy communications to their own members.

In 2001, the Legislature adopted a requirement that if a membership organization spends more than \$50 to expressly advocate for or against a candidate, the organization needs to file a one-time report. (The Commission receives relatively few membership communication reports – six were filed in 2018).

The threshold of spending \$50 to influence a candidate's election is one of the lower thresholds for filing a campaign finance report, and significantly lower than the \$250 threshold for filing an independent expenditure report. The Commission staff recommends an incremental change to \$100 per candidate. (Goods or services with a value of \$50 in September 2001 were worth \$72 in April 2019.)

Sec. 15. Presumption period for independent expenditures (§ 1019-B(2))

Between Labor Day and a general election, if an organization spends more than \$250 on a communication that names or depicts a clearly identified candidate, the communication is presumed to be an independent expenditure which requires filing a financial report with the Commission. The law provides an opportunity for the organization to rebut this presumption by presenting evidence to the Commission that the paid communication was not intended to influence the candidate's election.

To provide a more reasonable opportunity for this rebuttal procedure, the Commission proposes changing the deadline for submitting the rebuttal statement to within 48 hours of disseminating the communication – rather than within 48 hours of incurring an obligation or expenditure for the communication (which can occur days or weeks before the communication is disseminated to voters.) Independent expenditure reports no longer impact the payment of Maine Clean Election Act funds, which required a short deadline. Also, a single communication may involve multiple financial obligations or payments to different vendors. So, a deadline of 48 hours after the communication's dissemination is a simpler and more reasonable deadline for everyone to understand.

Sec. 16. Increasing the penalty for not filing a candidate registration from \$10 to \$100 (§ 1020-A(1))

Each election year, some candidates for legislative and county offices fail to register with the Commission, even after multiple attempted contacts by the Commission staff. In the late spring of the election year, the Commission sometimes needs to initiate an enforcement process in order to persuade some individuals to register. The Commission proposes increasing the penalty for failing to register from \$10 to \$100. The current penalty of \$10 is so small that it has little punitive value. Whether the office

is municipal, county, or legislative, the public deserves to have each candidate for public office file a simple form providing contact information and identifying a treasurer and other officers.

Sec. 17. Maximum penalties when a campaign finance report is filed late or does not substantially conform to disclosure requirements (§ 1020-A(5-A))

Under this proposal, the Commission seeks to clarify that if contributions or expenditures exceeding \$50,000 are disclosed in a campaign finance report, but the details of the transactions are incomplete or inaccurate, the maximum penalty is 100% of the amount that was reported incompletely or inaccurately. This clarification is intended to avoid a potential legal interpretation of current law argued for by respondents in the York County casino matter. They argued that, under current law, if the amount of contributions was correctly disclosed in a campaign finance report, the higher penalties would not apply, even though the reports did not correctly name the actual contributor.

Sec. 18 & 19. Clarification of coverage of Chapter 13, Subchapter IV (§§ 1051 & 1052)

Chapter 13, subchapter IV sets out the registration and campaign finance reporting requirements for both PACs and BQCs. The Commission proposes amendments to Sections 1051 and 1052 to clarify that certain provisions in this subchapter relate both to PACs and BQCs.

Sec. 20. Pre-recorded phone calls to influence a ballot question (§ 1055-A(1))

Section 1055-A requires a "paid for" disclosure statement in any communication to voters costing more than \$500 that expressly advocates for or against a ballot question. Enacted in 2013 at the suggestion of the Commission, this requirement is analogous to the "paid for" requirement in candidate election communications in Section 1014.

The Commission proposes broadening the requirement to cover telephone calls, which would be analogous to Section 1014(5). (The Commission staff is unsure why telephone calls were omitted from the statute, when originally enacted in 2013.) If members of the public are receiving a paid automated or scripted telephone call expressly urging them to vote for or against a ballot question, it could assist them in evaluating the message if the speaker disclosed which organization sponsored the communication. Because of time limitations in automated calls, we suggest omitting the address requirement (also analogous to Section 1014(5)).

Sec. 21. Penalty for omitting the “paid for” message in ballot question communications (§ 1055-A(3))

The Commission’s original 2013 proposal did not include a penalty provision. Although the Commission is aware of very few violations of this disclosure requirement, someday a violation could occur that is viewed as significant and the Election Law could appear ineffective if there is no penalty. This proposed penalty provision is based on Section 1014(4).

Sec. 22. Clarifying the donor exception – ballot question committee statute (§ 1056-B)

Under 21-A M.R.S. § 1056-B, individuals or organizations that do not qualify as a PAC, but that receive or spend more than \$5,000 for the purpose of initiating or influencing a ballot question are required to register with the Commission as BQCs and file campaign finance reports according to the same schedule as PACs.

Current law contains an exception for donors that make contributions to a PAC or BQC. This exception appears in the second line of §1056-B in the phrase “other than by contribution to a political action committee or a ballot question committee.” The rationale for the exception is that merely making a cash donation greater than \$5,000 to a PAC or BQC should not, in itself, require filing ongoing financial reports with the State of Maine. The public is adequately served if the PAC or BQC lists the donor in the campaign finance reports.

In two high-profile matters, advocates have stretched the current exception beyond its intended meaning to argue that an organization is not required to register with the Commission even if it had raised contributions to influence a ballot question election as long as it donates those funds to a PAC or BQC. To avoid this interpretation and to achieve greater clarity, the Commission proposes to move this donor exception to its own sentence near the end of the paragraph of the section (“A person whose only payments of money ...”)

Sec. 23. Filing requirements for PACs (§ 1059)

In sections 12 and 23, the Commission proposes statutory changes to clarify the filing schedule for state party committees and PACs. We are not seeking to change the current filing schedules. Rather, we are attempting to clarify the statutory language to reflect current practice. These changes would also affect BQCs, which by statute are under the same filing deadlines as PACs.

Paragraph A – PACs would need to file quarterly reports every year.

Paragraph B – in a candidate election year, PACs would also file reports 11 days before and 42 days after the primary and general elections.

Paragraph C – in an odd-numbered year, PACs would file the 11-day and 42-day reports only if the PAC were raising or spending money to influence a special election, a ballot question election, or a municipal election in a town or city with a population of 15,000 or more.

Paragraph D – in a candidate election year, PACs would file 24-Hour Reports before each primary and general election. (Please note that the reports would be required before a primary or general election even if the contribution or expenditure was not for the purpose of influencing the election.) During odd-numbered years, the 24-Hour Reports are required only if the PACs were spending money to influence that election.

Sec. 24. Maximum penalties when a campaign finance report is filed late or does not substantially conform to disclosure requirements (§ 1062-A(4))

Under this proposal, the Commission staff seeks to clarify that if contributions or expenditures exceeding \$50,000 are disclosed in a campaign finance report, but the details of the transactions are incomplete or inaccurate, the maximum penalty is 100% of the amount that was reported incompletely or inaccurately. This clarification is intended to address a legal interpretation of current law proposed by respondents in the York County casino matter. They argued that, under current law, if the amount of contributions was correctly disclosed in a campaign finance report, the higher penalties would not apply even though the reports did not correctly name the actual contributor.

Sec. 25. Collection of qualifying contributions in cash (§ 1122(7))

To receive initial payments of Maine Clean Electon Act (MCEA) funds, candidates must collect a minimum number of \$5 qualifying contributions (QCs) by check, online payment or cash. The Commission's past practice has been to allow a candidate to receive QCs in cash, provided that the candidate uses that cash to reimburse him- or herself or others for the purchase of a money order that is subsequently signed by the contributor and submitted to the Commission.

In § 1122(7)(A), the Commission proposes to change the definition of qualifying contribution to reflect that candidates may collect QCs in cash.

Sec. 26. Filing declaration of intent before collecting additional qualifying contributions (§ 1125(1))

The MCEA requires candidates to file a “declaration of intent” (a one-page form) once they decide to qualify for public campaign funding. Under current law, if a candidate were to collect QCs before filing the declaration of intent, the QCs are valid only if collected during a short window of time: five business days before the filing of the declaration of intent. QCs collected earlier than the five-business-day period are invalid and will not count toward qualifying to receiving initial payments of MCEA funds. The Commission proposes that the same restriction apply to additional qualifying contributions collected to qualify for supplemental payments of MCEA funds.

Sec. 27. Change in terminology from “participating candidate” to “certified candidate” (§ 1125(2-A))

This is a proposed change in terminology in the statute that governs the collection and spending of seed money by MCEA candidates. These are contributions of up to \$100 that MCEA candidates may collect from individuals to start their campaigns.

The last sentence of paragraph 2-A(A) prohibits an MCEA candidate from using MCEA funds retroactively to pay for goods and services that helped them qualify for MCEA funding. In this scenario, the term “certified candidate” (someone who has qualified for MCEA funding) would be more appropriate than “participating candidate” (someone who is attempting to qualify).

Sec. 28. Collection of QCs in cash (§§ 1122(1) & 1125(3))

Section 1125(3) sets out the procedures by which candidates collect QCs by check, online payment, or cash, in order to receive initial payments of MCEA funding. The Commission proposes breaking it down into paragraphs to make the subsection easier to digest, and also proposes an alternative to the current procedures for collecting QCs in cash (in paragraph F).

Paragraphs D and E restate current law, except that the second sentence of paragraph E clarifies that if a contributor erroneously makes a QC by writing a check payable to *the candidate*, the Commission may endorse the check to the proper payee (the Maine Clean Election Fund). This would reflect a current practice of the Commission.

Paragraph F relates to QCs made by cash. Under current law, the Commission’s past practice has been to allow a candidate to receive QCs in the form of \$5 in cash, provided that the candidate uses that cash to reimburse him- or herself or others for the purchase of a money order that is subsequently signed by the contributor and submitted to the Commission. This has required candidates to purchase dozens of

money orders (all at a fee), and to have the money orders available for the contributor to sign at the time of receiving a cash contribution (which can be unpredictable) or obtain a signature from the contributors after the contribution, which requires a second meeting.

In paragraph F, the Commission proposes an alternative procedure which we hope would be more efficient. This method was proposed in 2017 by Sen. David Miramant in LD 585 (128th Legislature). Under this procedure, the contributor would need to sign a special form affirming that they gave \$5 in cash. The Commission staff used a version of this form in 2018 when a candidate submitted a money order that was not signed by the contributor. The form is designed for one contribution only, so the affirmation is difficult for the contributor to miss or misunderstand.

After receiving \$5 in cash from multiple contributions, the candidate would use that cash to purchase a single money order that would be submitted to the Commission. The advantages of this proposal are that candidates would not need to visit a vendor such as the U.S. Post Office or Wal-Mart to purchase dozens of money order and have the money orders on hand when they might receive cash contributions, or purchase the money orders after the contributions and return to the contributors to obtain their signatures. The candidates would merely need to have the blank cash contribution forms with them anytime they are in public when someone might give them \$5 in cash. Another benefit is that the candidates would not need to pay for multiple fees for money orders, or account for those fees in campaign finance reports.

The Commission's proposal is that the candidate could use either procedure: (1) Sen. Miramant's idea of combining the cash contributions into a single money order, or (2) the traditional method of submitting separate money orders signed by the contributors. The traditional method is described in paragraph G.

Paragraph H specifies how the candidate should report the fees paid to the vendor when money orders are purchased for this purpose. (Usually the money orders are purchased by the candidate, but not always.) The Commission proposes one accommodation to simplify the process for candidates: if a candidate purchased money orders with personal funds, the candidate would not need to account for the fees as an in-kind contribution in the candidate's seed money report. Fees paid by other people would be an in-kind contribution to the candidate.

Paragraphs I and J retain certain language currently in statute authorizing the Commission to establish a website for members of the public to make QCs electronically and forbidding the submission of fraudulent QCs.

Sec. 29. Additional QCs (§ 1125(3-A))

Section 1125(3-A) relates to the additional qualifying contributions that candidates may collect to qualify for supplemental payments. The last sentence is inserted to clarify that the same procedures and restrictions set out in subsection 3 for contributions collected to qualify for the initial payments of MCEA funds also apply to additional qualifying contributions.

Sec. 30 (first paragraph). Receipt and Acknowledgment Forms (§ 1125(3-B))

Part of the definition of QC in § 1122(7)(D) is that the contributor must acknowledge in writing that the contribution was made from the contributor's personal funds and was not given in exchange for receiving anything of value. Since 2000, the Commission has used a "Receipt and Acknowledgement Form" for this purpose. The proposed subsection 3-B directs the Commission to develop such a form and invalidates a QC if anyone other than the contributor signs the contributor's name to the form (with some exceptions for a contributor who is physically unable to sign). This reflects current practice. (If the spouse or domestic partner of a contributor signs the Receipt and Acknowledgement Form, the Commission does not count the QC as valid and we ask the candidate to obtain the contributor's signature on the form.)

Sec. 30 (second paragraph) & 31. Residency requirements (§§ 1125(3-B), (3-C) & 1125(5-A))

Typically, during an election year, the Commission staff receives concerns that a few candidates are running for the Legislature without meeting the requirements in the State Constitution to be a resident of the legislative district:

- (1) The candidate must be a resident in the legislative district for three months prior to the candidate's election.
- (2) The candidate must be a resident of the district at the time of their nomination for placement on a primary, general or special election ballot.²

² For example, Article IV, Part First, Section 4 states as follows (underlining added for emphasis)

No person shall be a member of the House of Representatives, unless the person shall, at the commencement of the period for which the person is elected, have been 5 years a citizen of the United States, have arrived at the age of 21 years, have been a resident in this State one year; and for the 3 months next preceding the time of this person's election shall have been, and, during the period for which elected, shall continue to be a resident in the district which that person represents.

No person may be a candidate for election as a member of the House of Representatives unless, at the time of the nomination for placement on a primary, general or special election ballot, that person is a resident in the district which the candidate seeks to represent.

The Commission believes it is not appropriate for a candidate to receive MCEA funding if they do not meet both requirements prior to their election – regardless of whether they win the election.

There is no process currently for a concerned voter in the legislative district (or a political opponent) to complain that a candidate who is receiving public campaign funds under the MCEA does not meet the residency requirements. A registered voter from the district has only a five-business-day period to challenge a candidate's nominating petition, and that period occurs in March (for party candidates) or June (for non-party candidates) of the election year. Relevant information about residency may not come to light until after those challenge periods have expired. Under the State Constitution, the Maine House of Representatives and the Senate judge the qualifications of their own members. This does not apply, however, to candidates who have lost the general election.

The Commission acknowledges that some of the concerns we hear from the public are based on incomplete knowledge of the candidate's circumstances and/or a misunderstanding of how residency is defined for voting purposes in 21-A M.R.S. § 112. If this provision is enacted, the Commission might receive only one or two complaints per election cycle relating to MCEA candidates that are worthy of investigation. Nevertheless, the Commission makes this proposal so that members of the public may have a forum in which to air their concerns effectively.

Sec. 32. Payments to family members (§ 1125(6-C))

Under current § 1125(6-C)(A), an MCEA candidate is strictly prohibited from paying public campaign funds to compensate the candidate or a sole proprietorship of the candidate for campaign services. Under subsection 6-C(B), the candidate may compensate a members of the candidate's immediate family or household, but only if three conditions listed in the paragraph are met. The same conditions are required if the candidate wishes to compensate a business entity owned by the candidate, an immediate family member or household member.

The Commission proposes language that would extend the strict prohibition in subsection 6-C(A) to the candidate's spouse or partner, or a business entity owned by the candidate, or spouse or partner, to avoid any appearance that MCEA funds were used for self-serving reasons. As background, please be aware that the term "immediate family" is defined in 21-A M.R.S. § 1(20) more broadly than one might expect, and includes grandchildren and in-laws.

Sec. 33. Fixing terminology (§ 1125(8-E))

We propose inserting "or certified" to this subsection, because most additional qualifying contributions are collected by certified candidates.

Titcomb remarks presented at the Jan. 28th Commission Meeting:

Thank you, Mr. Chair and members of the Commission. I appreciate the opportunity to appear before you today.

I want to begin by addressing one point raised by counsel for the Maine Democratic Party and noted in the staff report—that I was involved in the Yes on 1 campaign. That is true. But it is not material to the question before the Commission.

This proceeding is not about the merits of Question 1, nor about the motivations of those who supported or opposed it. It is about whether an organization engaged in campaign influence activity complied with Maine's campaign finance laws—and, if it did not, what consequences follow under those laws.

In its response, the Maine Democratic Party argues that it reasonably interpreted the statute, sought guidance from Commission staff, and reported its activity. That argument invites the Commission to view the identified failures as inadvertent or excusable. I respectfully submit that such claims must be evaluated carefully and in full context. *To the extent there is any statutory ambiguity, that ambiguity does not eliminate the need for an investigation into what activity occurred, how it was reported, and whether statutory thresholds were met.*

The Maine Democratic Party is not a new or unsophisticated organization. It is a professional political entity that raises and spends tens of millions of dollars—by its own reporting, well over twenty-five million dollars. It employs experienced staff, retains legal counsel, and routinely navigates complex campaign finance requirements. This is not a grassroots organization unfamiliar with the law or lacking institutional capacity.

Against that backdrop, the reporting deficiencies identified by Executive Director Wayne are neither technical nor insignificant. Required pre-election and post-election reports were not filed. Expenditures opposing Question 1 were not clearly designated, despite the existence of reporting fields specifically designed for that purpose. As the staff correctly notes, a reasonable member of the public reviewing those filings could not determine how much was spent to influence the referendum, when that spending occurred, or for what specific purposes.

Even if the Commission were to accept the Party's legal position that separate registration as a ballot question committee was not required, those reporting obligations still existed under the party committee statute. They were mandatory. And they were not met. The result was a public disclosure record that failed to provide meaningful transparency during a major statewide referendum.

The Commission's role is not to assess political alignment or intent. It is to apply the law as written, and to do so evenly. Claims of reasonable interpretation or reliance on informal guidance warrant careful scrutiny when advanced by a large, well-resourced organization with extensive experience in campaign finance compliance. *Informal staff communications, while*

potentially relevant to intent, are not binding on the Commission and do not override statutory reporting obligations.

I am not asking the Commission to reach conclusions today beyond what the statute requires at this stage. I am asking that the standards applied are without deference based on size, influence, or institutional familiarity. For these reasons, I respectfully agree with the staff's conclusion that sufficient grounds exist to believe violations may have occurred and that a full investigation is warranted.

I would also respectfully caution against the suggestion that the passage of the election renders these issues moot. The harm here is not the outcome of a single ballot question. The harm is the absence of timely public disclosure during an active referendum—when voters were entitled to know who was spending significant sums to influence their vote.

Failing to address these issues risks establishing a precedent that compliance is effectively optional once an election concludes, particularly for large and well-resourced organizations. That result would undermine the Commission's role in enforcing Maine's campaign finance laws and ensuring transparency at the moment it matters most.

Accordingly, the Commission's response in this matter will signal whether disclosure obligations remain enforceable regardless of election timing or political stature. For that reason, these issues warrant careful review and meaningful resolution, notwithstanding the fact that the election has passed.

Turning briefly to a question raised in the staff report: Mr. Wayne asks why the Legislature would establish what may appear to be a duplicative reporting regime.

I respectfully submit that Maine's Legislature is a citizen legislature—part-time, with frequent turnover. As the scope and complexity of regulation has expanded, it is neither unusual nor implausible that statutes overlap or intersect. In the context of campaign finance law, such overlap often reflects a legislative preference for disclosure over gaps or ambiguity.

Accordingly, the possibility that reporting obligations overlap should not be viewed as evidence that ballot question committee statutes were not intended to apply to party committees when the statutory definition is otherwise met. That determination properly turns on the language enacted by the Legislature and the transparency objectives those provisions are designed to serve.

Thank you for your time and your careful consideration.



M E M O R A N D U M

TO: COMMISSIONERS, COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES (“COMMISSION”)

FROM: JONATHAN BOLTON, AAG

SUBJECT: LEGAL REQUIREMENTS FOR PARTY COMMITTEES ENGAGING IN SPENDING TO INFLUENCE BALLOT QUESTIONS

DATE: FEBRUARY 18, 2026

CC: JONATHAN WAYNE, EXECUTIVE DIRECTOR

At the January 28, 2026 meeting you requested a memo discussing whether Maine’s campaign-finance laws (21-A M.R.S.A., ch. 13) require party committees who make substantial expenditures to influence ballot questions to form a ballot question committee (BQC). This request arose based on the Commission’s consideration of a complaint alleging that the Maine Democratic Party (MDP) received contributions and made expenditures opposing a referendum question on November 2025 ballot that exceeded the threshold for an entity to register as a ballot question committee.

After reviewing the relevant legal authorities and the parties’ submissions, I offer my thoughts and analysis below. This memo reflects my own legal analysis as counsel to the Commission. It is not an opinion of the Attorney General under 5 M.R.S.A. § 195.

I ultimately conclude that, while the relevant statutes are ambiguous and could be plausibly interpreted in different ways, the best interpretation is that party committees are exempt from BQC registration requirements and must instead report all ballot-question expenditures in their party reports.

BACKGROUND

On November 19, 2025, the Commission received a complaint from an officer of a BQC supporting one of the questions on the November 2025 ballot. The complaint alleges that the MDP received contributions and made expenditures to oppose Question 1 that exceeded the monetary thresholds for it to qualify under the statutory definition for a ballot question committee. MDP does not dispute that it

exceeded these monetary thresholds but contends that it satisfied its disclosure obligations by reporting these contributions and expenditures in its party reports.

This memo focuses exclusively on the legal question of whether MDP was required by law to register as a BQC in order to report its expenditures. I do not discuss the apparent factual dispute concerning whether and to what extent MDP relied on advice of commission staff.

LEGAL AUTHORITIES

In order to assist the Commission in reaching a decision in this matter, this section outlines the factors that should be considered in reaching the best interpretation of the statutory framework.

STATUTORY TEXT AND STRUCTURE

Party Committees

Maine’s campaign-finance laws recognize three types of committees: BQCs, political action committees (PACs), and party committees. BQCs and PACs are addressed in their own subchapter of the campaign-finance laws, subchapter 4. Subchapter 4 contains definitions of “ballot question committee” and “political action committee” that effectively serve to spell out the requirements for when an entity needs to register with the Commission and file campaign-finance reports. 21-A M.R.S.A. § 1052(2-A) & (5). Party committees, on the other hand, are not expressly defined or regulated in subchapter 4. Rather, they are regulated in subchapter 2, the same subchapter that regulates candidates.¹

Party committees are required to file reports under 21-A M.R.S.A. § 1017-A. That statute contains one filing schedule for state party committees and a different, less onerous filing schedule for municipal, district and county party committees. *See* 21-A M.R.S.A. § 1017-A(4-A) & (4-B). All types of committees must include the same categories of information in their filings, including the “purpose” of each expenditure. *Id.* § 1017-A(1)–(3).

The language of § 1017-A has two notable aspects for present purposes:

First, even though parties exist to elect candidates, their reporting obligation clearly encompasses spending to influence referenda elections as well as candidate elections. The statutory text requires reporting of expenditures to influence a “campaign, as defined in section 1052, subsection 1.” That cross-referenced definition expressly covers a course of activities to influence referenda elections. *See*

¹ Title 21-A does not define “party committee,” but defines “party” as “a political organization which has qualified to participate in a primary or general election under chapter 5.” 21-A M.R.S.A. § 1(28). Parties must form state and local committees to carry out their formal functions under election law. *See, e.g.*, 21-A M.R.S.A. §§ 311 (municipal party committees); 322 (state, congressional district, and county party committees).

21-A M.R.S.A. § 1052(1). In addition, §1017-A(4-A)(C) sets forth a schedule for parties to file reports in years without a general election where they have made contributions or expenditures “for the purpose of influencing a ballot question election,” among other things.

Second, the statute repeatedly uses the term “all” to describe what must be reported. The party must report “*all* contributions.” And it must report “*all* expenditures made to influence a campaign.” *Id.* § 1017-A(1) & (2).

Ballot Question Committees

The law defines *ballot question committee* as

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 political action committee or an exempt donor.

21-A M.R.S.A. § 1052(2-A). *Person* is a statutorily defined term:

“Person” means an individual, committee, firm, partnership, corporation, association or organization.

21-A M.R.S.A. § 1001(3). This definition applies to all uses of *person* in Maine’s campaign-finance laws (i.e. Title 21-A, chapter 13) “unless the context otherwise indicates.” *Id.* § 1001.

There appears to be no viable argument that a party committee is outside the statutory definition of *person* as a general matter. A party committee, quite simply, is a type of “committee.”² If party committees are not “persons” within the meaning of the BQC statute, it would have to be because “the context otherwise indicates.”

Also notable about this definition is that it ends with a list of exceptions, which notably does not include party committees, though it does include PACs—another type of committee.

Differences in Reporting Requirements.

The requirements for BQC and party committee reports are similar but not identical, with BQCs subject to slightly more rigorous requirements. BQCs and state party committees must file quarterly reports as well as reports on the 11th day before any election and the 42nd day after the election. *See* 21-A M.R.S.A.

² Although there is a definition of “committee” in 21 A M.R.S.A. § 1052(2) that limits that term to PACs and BQCs, that definition only applies to terms used in subchapter 4, thus does not apply to the use of “committee” in the definition of “person,” which appears in subchapter 1.

§§ 1017-A(4-A); 1059(2). Municipal, district, and county party committees are subject to a more lenient reporting schedule than BQCs, with only semiannual reports required, as well as a report 11 days before a general election (but not a primary election). *See* 21-A M.R.S.A. § 1017-A(4-B).

BQCs are subject to a lower threshold for reporting contributions: they must report all individual contributions of more than \$50, while party committees may report contributions of \$200 or less as a lump sum.

BQCs and party committees are subject to different definitions of “contribution” and “expenditure,” with the definitions applicable to party committees (and candidates) containing more exceptions. *Compare* 21-A M.R.S.A. § 1012(2) & (3) *with* 21-A M.R.S.A. § 1052(3) & (4).

BQCs must file registration paperwork with the Commission that provides several categories of information, including a statement of purpose that apprises the public of which ballot question it intends to support or oppose. *See* 21-A M.R.S.A. § 1052-A(3). Party committees are subject to more modest registration requirements and are not required to disclose in that paperwork whether they are in support or opposition to specific ballot questions. *See id.* § 1013-A(3).

Finally, the BQC statute is somewhat more prescriptive in what information must be reported for each expenditure. While the party committee statute requires reporting the “date, amount, and purpose of each expenditure,” the BQC statute requires, among other things, “the date, payee and purpose of the expenditure and the name of each . . . referendum or initiated petition supported or opposed by the expenditure.” *Compare* 21-A M.R.S.A. § 1017-A(2)(C) *with* 21-A M.R.S.A. § 1060(4).

LEGISLATIVE HISTORY

I was unable to find much in the legislative history of the relevant provisions that illuminated legislative intent. The Legislature amended § 1017-A to require party committees to report referendum spending in 2003, in a bill entitled “An Act To Standardize Reporting Requirements for State Party Committees’ Expenditures and Contributions.” *See* P.L. 2003, ch. 302 (legislative history materials available at <https://ldc.mainelegislature.org/Open/Meta/LegHist/121/lh121-LD-0659.pdf>). At the time of this change, there was already a separate requirement in statute that “[a]ny person not defined as a political committee who solicits and receives contributions or makes expenditures, other than by contribution to a political action committee, aggregating in excess of \$1,500 for the purpose of initiating, promoting, defeating or influencing in any way a ballot question must file a report with the commission.” P.L. 1999, ch. 729, § 8 (codified as amended at 21-A M.R.S.A. § 1056-B until later repealed).

The proponents of this bill were clearly more concerned with altering the schedule of party-committee reports than they were with enhancing the information that must be included in those reports. Indeed, I can find no mention in the legislative history of the latter change. So it is difficult to draw much insight from this history. Perhaps the lack of commentary on the change indicates that parties

understood themselves to be required to report referenda expenditures in their party-committee reports even before it was made explicit in statute. But that is speculation on my part.

CASELAW

I did not find any relevant caselaw on the question presented here. According to Westlaw, 21-A M.R.S.A. § 1017-A has never been cited in a reported decision.

POSSIBLE INTERPRETATIONS

In my view, there are three interpretations of the statutory framework that are at least conceivable given the considerations above:

Interpretation #1: Party committees that reach the \$5,000 spending threshold to qualify as a BQC must file two sets of reports, one under the BQC statute and one under the party committee statute, both of which include their ballot question spending.

Interpretation #2: Party committees that reach the \$5,000 spending threshold are required to stop making expenditures under their own name and must form a BQC to continue spending; the party would then report any further spending as contributions to the BQC under § 1017-A, and the BQC would report the expenditures it made using those contributions in its BQC reports under §§ 1059–1060.

Interpretation #3: Party committees are exempt from BQC reporting requirements because they are not “persons” as that term is used in the specific context of the BQC statute and thus need only file reports under § 1017-A

ANALYSIS AND RECOMMENDATION

My recommendation is that the Commission conclude that party committees are subject only to the reporting requirements of § 1017-A and are not required to either register as a BQC or form a separate BQC if they spend over the \$5,000 threshold. My reasoning follows.

The goal of statutory interpretation is to give effect to the Legislature’s intent. *See State v. Santerre*, 2023 ME 63, ¶ 8, 301 A.3d 1244. And while that analysis requires considering the “plain meaning” of the statutory language, that consideration must occur “in the context of the whole statutory scheme.” *Id.*; *see also Mallinckrodt US LLC v. Dep’t of Env’t Prot.*, 2014 ME 52, ¶ 21, 90 A.3d 428 (court must construe the “whole statutory scheme of which the section at issue forms a part so that a harmonious result, presumably the intent of the Legislature, may be achieved”). “[A]bsurd, illogical, or inconsistent results” should be avoided. *Santerre*, 2023 ME 63, ¶ 9, 301 A.3d 1244. It is also appropriate to consider the “subject matter, design, and structure of the statute, as well as the consequences of specific interpretations.” *Id.*

Here, the Commission is faced with a definition of “ballot question committee” that is seemingly sweeping, covering all “persons,” broadly defined, who meet the financial thresholds, subject only to two enumerated (and inapplicable) exceptions. Yet the Commission is simultaneously faced with a larger statutory scheme that elsewhere sets forth a comprehensive framework for party committees to report to the public on their activities. *See* 21-A M.R.S.A. § 1017-A. That framework by its plain terms already requires that party committees report their expenditures to influence referenda, with some relatively minor differences from the BQC statute in scope and procedure. *Id.*

Moreover, that separate framework set forth in § 1017-A uses exhaustive terminology to describe the reports that are required, expressly requiring the committee to report “all” of its contributions and “all” of its expenditures. *Id.* Courts have recognized that the “the use of the word ‘all’ as a modifier suggests an expansive meaning because ‘all’ is a term of great breadth.” *Project Vote/Voting for Am., Inc. v. Long*, 682 F.3d 331, 336 (4th Cir. 2012) (cleaned up).

Given that the Legislature has created a comprehensive scheme for party-committee reporting, it seems unlikely that the Legislature meant for party committees who spend over \$5,000 to influence a ballot question to file a second set of reports that require disclosure of largely the same information on largely the same timetable. While the Legislature’s use of the defined term “person” to describe who must register as a BQC indicates that it generally meant for “committees” to be included in those who must register, it not clear that the Legislature intended to encompass a very specific type of committee that it elsewhere already subjected to a very similar disclosure regime.

Indeed, to read the statute to require dual reporting raises the specter of, if not “absurd” results, then at least the sort of “illogical, or inconsistent results” that statutory interpretation should strive to avoid. *Santerre*, 2023 ME 63, ¶ 9, 301 A.3d 1244. In short, for the statutory framework to work as a “harmonious” whole, the BQC statute should be interpreted as implicitly exempting party committees. *See Mallinckrodt*, 2014 ME 52, ¶ 21, 90 A.3d 428.

It may be objected that this interpretation gives too much weight to structural and policy concerns and not enough weight to plain words of the BQC statute. After all, the BQC statute uses a defined term, “person,” that expressly encompasses a “committee” in its statutory definition. And while “committee” is itself undefined, any reasonable interpretation of that term would encompass a party committee. *See Searle v. Town of Bucksport*, 2010 ME 89, ¶ 8, 3 A.3d 390 (undefined statutory terms should be given their “plain and natural meaning and should be construed according to their natural import in common and approved usage”).

But the statute containing the definition of *person* itself provides that these definitions should not be mechanically applied, stating that its definitions govern within Chapter 13 “unless the context otherwise indicates.” 21-A M.R.S.A. § 1001. In this case, the fact that the Legislature has separately subjected this particular type of committee to an analogous and comprehensive regulatory scheme is, in my

view, sufficient “context” to read *person*, as used in the BQC statute, to exclude party committees.

A second objection is that the Legislature did include two other express exceptions in the BQC statute—for exempt donors and PACs—and yet did not list party committees as a third exception. Making matters worse, the Legislature *did* think to exempt party committees from the definition of PAC. See 21-A M.R.S.A. § 1052(5)(B)(3). This objection is, in my view, the strongest argument against an interpretation of “person” in the BQC statute as excluding party committees: the Legislature clearly knew how to make exceptions, including exceptions for party committees, and yet apparently did not see fit to include party committees among those exceptions.

The answer to this objection is that party committees exist to elect candidates and, as a result, can be expected to only rarely delve into influencing ballot questions. Thus, it would have been easy for the Legislature to overlook the need for an express exception in the BQC statute for party committees. The caveat in the definition of “person” for when “context otherwise indicates” is a concession that there will inevitably be circumstances in a complex regulatory framework in which defined terms may need to be given a more nuanced meaning to best effectuate overall legislative intent.

A final objection to this approach may be that the MDP’s actual disclosures on their party reports were not sufficiently specific to apprise the public of the extent of their involvement in opposing Question 1. This deficiency can plausibly be blamed on the less prescriptive language in the party-committee statute, which requires identification of *candidates* supported by expenditures, but does not specifically require identification of ballot questions supported or opposed. 21-A M.R.S.A. § 1017-A(2). Had MDP formed a BQC, in contrast, the BQC would have been under a clear obligation to specify the “name of . . . each referendum or initiated petition supported or opposed by the expenditure.” 21-A M.R.S.A. § 1060.

But § 1017-A(2), though considerably more terse than the BQC statutes in its reporting requirements, does require the party committee to state the “purpose” of the expenditure. See 21-A M.R.S.A. § 1017-A(2)(C). In the case of an expenditure to influence a ballot question campaign, the “purpose” requirement can reasonably be interpreted to require, among other information, identification of which ballot question is being supported or opposed. Although I offer no view on the technical capacities of the Commission’s then-current filing system to accept such detail in bulk form, the lack of such detail in MDP’s reports is concerning. My presumption for purposes of this memo—which is crucial to my interpretation—is that, were this issue to come up in the future under an unchanged statutory framework, the Commission could and would expect future party committee reports containing ballot-question expenditures to be more specific about their “purpose” than were the submissions at issue here. Otherwise, the disclosure regime for party committees and BQCs could not be fairly understood as substantially similar.

The above analysis makes Interpretation #1 above—in which party committee would have to file duplicative reports as a party committee and as a BQC

the least plausible interpretation. However, Interpretation #2—in which the party committee directly reports ballot-question expenditures up to \$5,000 but must form and contribute to a BQC if exceeds the \$5,000 threshold—avoids the worst aspects of the dual-reporting problem inherent in Interpretation #1. But while a considerable improvement over Interpretation #1, Interpretation #2 is, in my view, still less convincing than Interpretation #3, in which the BQC statute is deemed wholly inapplicable to party committees.

Under Interpretation #2, the party committee would be required to register a new entity with a new name that would effectively serve as an alter-ego for the party for a particular ballot question campaign. Although the practical reality would likely be that the same party officials would continue to make all spending decisions, those transactions would now be reported to the public in a more convoluted way. Specifically, rather than the party committee disclosing its expenditures under its own name, the party committee would report a series of “contributions” to its alter-ego BQC, and that BQC would then report how those contributions were spent. The BQC would be free to adopt a generic name that would not make apparent its link to the party. One implication of this approach is that the on-ad disclaimers required by 21-A M.R.S.A. § 1055-A for advertisements to influence ballot questions would disclose only the name of the BQC, and not the party committee that is the de facto spender.³

Thus, while this interpretation has the virtue of giving “person” in the BQC statute its normal statutory definition, and also solves the double-reporting problem, it results in regulatory framework that will seemingly provide less transparency to the public than would an interpretation that allows party committees to make expenditures directly, without forming a BQC, and then requires it to report those expenditures as originating from the party committee. The former result would seem to undermine the overarching legislative purpose behind campaign-finance reporting—to provide transparency to voters about who is actually spending money to influence elections.

Interpretation #2 also seems at least in tension with the imperative in § 1017-A requiring party committees to report “all” expenditures to influence a campaign, including a referendum campaign. Under canons of statutory interpretation, this term should be given independent meaning. *See Project Vote*, 682 F.3d at 336; *Waterman v. Wheeler*, 2025 ME 96, ¶ 4, 347 A.3d 1028 (“All words in a statute are to be given meaning, and no words are to be treated as surplusage if they can be reasonably construed.”). Under Interpretation #2, parties would only be required to report expenditures to influence a ballot question campaign if they remained below \$5,000. After that, they would continue to make such expenditures in practice, but would report them via a different entity.

³ Of course, parties would be free to form such BQCs even if the law did not require them to do so. But there is a difference between the law allowing such an approach and the law compelling such an approach.

In short, while Interpretation #2 is a plausible reading of the statutory framework that should be seriously considered, I am ultimately not persuaded that it best effectuates the overall statutory framework, which appears to contemplate that party committees directly report *all* of their expenditures to influence ballot questions to the public.

I look forward to answering any questions you may have when we meet next week.

J.R.B.

February 23, 2026

Commission on Governmental Ethics and Election Practices
135 State House Station
Augusta, Maine 04333-0135

Re: Response to February 18, 2026 Memorandum of Assistant Attorney General Jonathan R. Bolton

Dear Commissioners and Staff:

I respectfully submit this response to the February 18, 2026 memorandum of Assistant Attorney General Jonathan Bolton addressing whether a party committee that exceeds the statutory threshold must register as a ballot question committee (“BQC”) under 21-A M.R.S. § 1052(2-A).

The memorandum concludes that party committees are categorically exempt from BQC registration requirements. That conclusion cannot be reconciled with the statutory text. It is reached only by subordinating clear language to structural preference and policy judgment. In doing so, the memorandum departs from Maine’s established rules of statutory interpretation and effectively inserts an exemption that the Legislature did not enact.

The statute says what it says. The memorandum declines to apply it.

I. The Plain Language of § 1052(2-A)

Section 1052(2-A) defines a ballot question committee as:

“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.”

“Person” is defined in § 1001(3) to include “an individual, committee, firm, partnership, corporation, association or organization.”

A party committee is a committee. The memorandum concedes there is no viable argument that party committees fall outside the definition of “person” as a general matter.

That concession should resolve the question.

The BQC statute lists two express exclusions: political action committees and exempt donors. Party committees are not excluded.

Under Maine law, when the Legislature enumerates specific exceptions, courts presume the list is exclusive. *Arsenault v. Sec’y of State*, 2006 ME 111, ¶ 17, 905 A.2d 285. The Legislature has

demonstrated elsewhere in Title 21-A that it knows how to exempt party committees when it intends to do so. It did not do so here.

Statutory interpretation begins with plain meaning, and where the language is clear, it governs. *State v. Santerre*, 2023 ME 63, ¶ 8, 301 A.3d 1244; *Dickau v. Vt. Mut. Ins. Co.*, 2014 ME 158, ¶ 19, 107 A.3d 621.

The definition is clear. The threshold is clear. The exclusions are clear.

II. “Context” Does Not Authorize Rewriting the Definition

The memorandum relies on the clause in § 1001 stating that definitions apply “unless the context otherwise indicates,” arguing that § 1017-A’s party reporting regime supplies contextual evidence that party committees were not intended to fall within § 1052(2-A).

Context may clarify ambiguity. It cannot nullify explicit language.

The Law Court instructs that statutes must be construed as a harmonious whole. *Mallinckrodt U.S. LLC v. Dep’t of Env’t Prot.*, 2014 ME 52, ¶ 21, 90 A.3d 428. Harmony does not permit displacement. Nor does it authorize reading into a statute an exemption that does not appear in the text.

There is no irreconcilable conflict between § 1017-A and § 1052(2-A). Repeals by implication are strongly disfavored and arise only where statutes cannot coexist. *City of Bangor v. Penobscot County*, 2005 ME 35, ¶ 11, 868 A.2d 177.

Section 1017-A governs general party committee reporting.

Section 1052(2-A) governs ballot-question-specific registration when a defined threshold is crossed.

They address different regulatory triggers. They are not mutually exclusive.

The memorandum resolves perceived structural tension not by harmonizing the provisions, but by removing party committees from § 1052(2-A) altogether.

That is not contextual interpretation. It is revision.

III. The Surplusage Problem

Maine courts consistently hold that no statutory language should be rendered meaningless if it can reasonably be given effect. *Waterman v. Wheeler*, 2025 ME 96, ¶ 4.

Under the memorandum’s interpretation, the \$5,000 threshold in § 1052(2-A) has no application to party committees, despite their explicit inclusion within “person.”

An entire class of committees is effectively removed from the statute's operation without textual basis.

That renders the threshold surplusage as applied to party committees — precisely the result Maine courts caution against.

Duplication is not absurdity. The absurdity doctrine is narrow. *Santerre*, 2023 ME 63, ¶ 9. Administrative inconvenience does not justify disregarding statutory triggers.

IV. The Reporting Differences Demonstrate That BQC Registration Is Substantive, Not Redundant

The memorandum acknowledges that BQC reporting requirements are “slightly more rigorous” than party committee reporting. Those differences are not incidental.

BQCs must itemize individual contributions over \$50. Party committees may aggregate contributions of \$200 or less. That is a materially different disclosure threshold.

The definitions of “contribution” and “expenditure” applicable to party committees contain more exceptions than those governing BQCs. The Legislature chose a narrower definitional framework for ballot question committees.

BQCs must file registration paperwork identifying the specific referendum they support or oppose. Party committees are not required to disclose ballot-question positions in their registration materials.

BQCs must report, for each expenditure, the name of the referendum supported or opposed. Party committees must report only the date, amount, and general purpose of each expenditure.

These are not cosmetic variations. They are ballot-specific transparency safeguards.

If party committees may exceed the \$5,000 threshold yet avoid BQC registration entirely, then these heightened disclosure requirements do not apply to the very entities capable of raising and spending the largest sums in referendum campaigns.

That result would not harmonize the statutes. It would eliminate the Legislature's ballot-specific transparency regime for a class of actors expressly included within the definition of “person.”

V. The Record Demonstrates the Transparency Function of Subchapter 4

Campaign finance statutes are disclosure statutes. Their central purpose is transparency.

At the January 28 Commission meeting, it was acknowledged that the party-only reporting structure did not clearly present ballot-specific spending to the public. It was conceded that the

reports “could be better” and did not readily allow a member of the public to determine how much was spent on Question 1.

The BQC framework exists precisely to provide referendum-specific clarity once spending exceeds a defined threshold.

Where ambiguity exists, interpretive principles favor advancing legislative purpose. *Dickau*, 2014 ME 158, ¶ 23.

The memorandum resolves perceived ambiguity in favor of narrowing the statute’s reach rather than advancing its transparency function.

VI. The Internal Tension in the Memorandum’s Three-Interpretation Framework

The memorandum identifies three possible interpretations:

1. Party committees must file both party and BQC reports once the threshold is met;
2. Party committees must form or register a BQC once the threshold is met;
3. Party committees are wholly exempt from the BQC statute.

Notably, both Interpretation #1 and Interpretation #2 give effect to the statutory definition of “person.” Only Interpretation #3 does not.

The memorandum rejects Interpretation #1 on duplication grounds. It rejects Interpretation #2 based on structural and policy concerns. It ultimately adopts Interpretation #3 — the only interpretation that removes party committees from the statute’s operative language entirely.

If party committees fall within “person” — and the memorandum concedes they do — then any interpretation that exempts them must rest on a clear textual basis. None exists.

If Interpretations #1 and #2 are textually plausible, then Interpretation #3 cannot be considered the best reading. It is the reading that departs most directly from the statute’s plain language.

VII. Equal Application of the Threshold

Section 1052(2-A) regulates activity — not institutional identity.

Under the memorandum’s interpretation:

- A grassroots citizen group spending \$5,001 must register as a BQC.
- A state political party spending over \$175,000 need not.

Nothing in the statutory language authorizes this asymmetry.

The statute applies to a “person.” The Commission’s role is to apply that definition consistently. *Santerre*, 2023 ME 63, ¶ 8.

Conclusion

Section 1052(2-A) applies to a “person.”

“Person” includes a “committee.”

The statute expressly excludes certain entities. Party committees are not among them.

The \$5,000 threshold is undisputedly exceeded in this matter.

The memorandum’s contrary conclusion depends on inferring an exemption not found in the statutory text. Maine law does not permit courts or agencies to create such exemptions through structural preference or policy judgment.

Accordingly, the proper application of § 1052(2-A) requires recognition that party committees fall within its scope when the statutory threshold is met.

For these reasons, the Commission should apply the statute as written.

Respectfully submitted,

Alex Titcomb

Additional Handout for Commissioners:

An Act to Require an Individual to Present Photographic Identification for the Purpose of Voting

ON BALLOT

Question Number: 1
Election Date: 11/04/2025

Do you want to change Maine election laws to eliminate two days of absentee voting, prohibit requests for absentee ballots by phone or family members, end ongoing absentee voter status for seniors and people with disabilities, ban prepaid postage on absentee ballot return envelopes, limit the number of drop boxes, require voters to show certain photo ID before voting, and make other changes to our elections?

COMMITTEES		EXPENDITURES TO SUPPORT		EXPENDITURES TO OPPOSE	
Committee	Committee Type	Committee Status	Stance	Expenditures to Support	Expenditures to Oppose
MAINE CONSERVATION VOTERS ACTION FUND	Political Action Committee	Active	Support	\$10,000.00	\$0.00
MAINE PEOPLE'S ALLIANCE - BQC	Ballot Question Committee	Active	Oppose	\$0.00	\$11,443.12
Save Maine Absentee Voting	Ballot Question Committee	Active	Oppose	\$0.00	\$1,119,944.23
Common Sense for Maine	Political Action Committee	Active	Support	\$925.00	\$0.00
Voter ID for ME BQC	Ballot Question Committee	Terminated	Support	\$258,831.74	\$0.00
DGA Maine - BQC	Ballot Question Committee	Terminated	Oppose	\$0.00	\$234,899.10
DCCC Maine - BQC	Ballot Question Committee	Terminated	Oppose	\$0.00	\$84,899.09
GCSM BQC	Ballot Question Committee	Active	Oppose	\$0.00	\$2,063.11
Disabled Voters Oppose Voter ID	Ballot Question Committee	Terminated	Oppose	\$0.00	\$22,080.01
Food AND Medicine BQ Committee	Ballot Question Committee	Active	Oppose	\$0.00	\$8,977.59
Maine Youth Power BQC	Ballot Question Committee	Terminated	Oppose	\$0.00	\$0.00
Community Action Alliance Committee	Ballot Question Committee	Terminated	Oppose	\$0.00	\$10,140.22

Rows per page: 25 1-12 of 12 < >

☰ Maine Ethics Commission ? ALL Search Candidates, Committees, and Officials TRANSACTION SEARCH

2025 An Act to Require an Individual to Present Photographic Identification for the Purpose of Voting

Top Spenders

1. Save Maine Absentee Voting	\$1,119,944.23
2. Voter ID for ME BQC	\$258,831.74
3. DGA Maine - BQC	\$234,899.10
4. DCCC Maine - BQC	\$84,899.09
5. Disabled Voters Oppose Voter ID	\$22,080.01

Total Contributions in 2025

\$15,107,006.55

Expenditures in 2025

Top Spending Committees in 2025

1. ACTBLUE MAINE	\$3,632,853.31
2. Save Maine Absentee Voting	\$1,534,903.48
3. MAINE DEMOCRATIC STATE COMMITTEE	\$966,263.12
4. Safeguard Girls Sports	\$790,100.00
5. Safe Schools, Safe Communities	\$658,472.58

Explore Candidate Data ALL CANDIDATE DATA

Explore All the Candidates Running for

Select Office ▼ in Select District ▼

View all 2026 Candidates in Select County ▼

Explore Committee Data ALL COMMITTEE DATA

View all 2025 Active Political Action Committees and Ballot Question Committees

View all 2025 Committees Involved in Ballot Questions

View all 2025 Committees Making Independent Expenditures

Explore Personal Financial Disclosures

View all Officials

View all Statements

Search

**Maine Ethics Commission
Campaign Finance System**

Import Manager

XML Reporting Specification

Version 1.2

06/02/2018

Maine Commission on Governmental Ethics & Election Practices

ETH-125

History of Changes

Version	Date	Description of change
1.0	5/2/2018	First Release for Publication
1.1	07/24/2018	Debt and Loan sections updated
1.2	06/02/2020	Purpose of expenditure and debt updated

TABLE of CONTENTS

OVERVIEW	1
IMPORTED FILES	1
DATA TYPES	3
FILE NAMING	4
FILE ELEMENTS / OCCURRENCES	4
THE <CONTROL> ELEMENT	5
THE <CONTRIBUTION> ELEMENT	6
THE <CONTRIBUTIONRETURN> ELEMENT	11
THE <EXPENDITURE> ELEMENT	11
ETHICS AND ELECTION PRACTICES	15
THE <ASSOCANDIDATE> ELEMENT	16
THE <ASSOCBALLOTQUESTION> ELEMENT	18
THE <EXPENDITURERETURN> ELEMENT	19
THE <LOAN> ELEMENT	20
THE <LOANPAYMENT> ELEMENT	24
THE <LOANFORGIVE> ELEMENT	24
THE <DEBT> ELEMENT	25
THE <DEBTPAYMENT> ELEMENT	28
CODE TABLES	29
CONTRIBUTIONS	29
<i>cbElectionType (type of election)</i>	29
<i>cbContributionType (type of contribution)</i>	29
<i>cbSourceType (type of contributor)</i>	30
<i>Valid cbSourceType - Committee Type combinations</i>	30
<i>cbOccupation (contributor's occupation)</i>	31
EXPENDITURES	32
<i>exPayeeType (type of payee)</i>	32
<i>exPurpose (purpose of expenditure)</i>	33
LOANS	34
<i>lnSourceType (type of loan source)</i>	34
<i>Valid lnSourceType - Committee Type combinations</i>	34
<i>lnSourceOccupation (loan source's occupation)</i>	35
DEBTS	36
<i>dbPayeeType (debt payee)</i>	37

OVERVIEW

This document details how to build a Campaign Finance report data file using XML in order to submit campaign finance data using Electronic Data Interchange (EDI) to the Maine Commission on Governmental Ethics & Election Practices. This document is written for committees and vendors who wish to create a software package to allow submission of contribution, expenditure, loan & debt data electronically with the Commission without having to re-type the information into the Campaign Finance web application.

With each of the line items submitted (contributions, expenditures, loans, loan payments, debts, debt payments contribution returns, and expenditure returns), it is required that you include an external reference ID, the alphanumeric identifier your system attaches to each line item. It needs to be a unique ID in your system and the value must be unique for each transaction submitted. Error reports will use this reference ID to match an error to a specific line item within your data file. In addition, the reference ID enables the system to detect and avoid adding duplicate records in the event duplicate reference IDs are included in more than one file upload, or a file is inadvertently uploaded twice.

You are also encouraged to use a similar type of unique identifier for your contributors and your expenditure payees. This will enable the system audit process to be more accurate and ultimately be more helpful to you.

IMPORTED FILES

What does the import file contain?

You will be electronically submitting only the line item records of contributions, expenditures, loans, loan payments, debts, debt payments, contribution returns, and expenditure returns. Summary totals are not included. The system calculates summary totals, based on the line items submitted. This is done at the time you log into the system to file your report for a reporting period.

When can files be imported?

These items (your contributions, expenditures, loans, loan payments, debts, debt payments, contribution returns, and expenditure returns) can be submitted at any time during the current reporting period. You may choose to submit all at one time, or submit items periodically during the current reporting period. **NOTE: Items submitted (imported), but not yet filed, are only viewable by the committee submitting the items and the Commissions' staff. The items are not viewable by the public until filed by your committee.**

How do the reported items get filed?

When you are ready to file the report for a specific reporting period, you will need to log into the system and go to the Candidate/Committee Overview page or the Filings Menu. At the time you file your report, the system will create a filing report dynamically and calculate all totals based on the items you have submitted electronically or entered online. You will be able to preview the report before final filing submission.

What is the format of the import file?

An import file may contain any combination of contributions, expenditures, loans, loan payments, debts, debt payments, contribution returns, and expenditure returns. The file will consist of a single XML formatted file containing exactly one record, with elements having zero-to-many relationships (see the File Elements / Occurrences section of this document).

Can a committee undo a submitted file?

It is possible to undo an entire submitted file. Line items from that imported file will be deleted from the database as long as:

- The item has not been included on a filed report.
- The item does not have other records associated to it from other import files.

If individual items need to be bypassed for the above reasons, and do not get automatically removed, you will need to log into the system and delete them individually.

DATA TYPES

This section describes the data types acceptable to the Campaign Finance System import program.

- Char(n). This is a character field. Any field listed as character can have any alphanumeric information as well as punctuation. Maximum lengths are in parenthesis. Please be aware that use of lowercase alpha information will be converted to uppercase alpha information. Note that this field cannot have the backslash (\) character or any line feed characters such as a Return.
- Integer. Only digits are allowed in this type of field.
- Date. Please format all user entered dates as CCYY-MM-DD.
- DateTime. Please format all user entered datetimes as CCYY-MM-DDThh:mm:ss.
- Money. A positive currency amount, which should be specified without a dollar sign. The decimal is optional for whole dollars. If there is a decimal, there should always be at least one digit to the left of the decimal, even if the amount is a fraction of a dollar (this is the only case in which leading zeros are advocated). Valid examples: 5.01, 0.25, 25.7, 43. Invalid examples: 3.731, \$5.25, .75.
- MoneyIncludeZero. This is the same as the money data type, except that 0 is allowed.

FILE NAMING

There is no specific file naming requirements to submit your data using XML, other than the file extension should be .xml.

FILE ELEMENTS / OCCURRENCES

Overview

The main sections or elements of the XML document are:

Import File Schema Elements	Occurs
<i>Control</i> – This is the highest element within the XML document. It contains all the sub-elements, and contains information on the filing request such as the committee, a brief description, and the date and time the XML file was created.	1
<i>Contribution</i> – Contains contributions and or donations	0 to many
<i>Contribution Return</i> – Contains contribution and or donation repayments	0 to many
<i>Expenditure</i> – Contains expenditures	0 to many
<i>Assoc Candidate</i> – Contains Candidates associated to expenditures if the expenditure, expenditure return or debt was to support or oppose a Ballot Question	0 to many
<i>Assoc Ballot Question</i> – Contains Ballot Questions associated to expenditures if the expenditure or expenditure return was to support or oppose a Ballot Question	0 to many
<i>Expenditure Return</i> – Contains expenditure that have been returned	0 to many
<i>Loan</i> – Contains loan records (new loans received)	0 to many
<i>Loan Payment</i> – Contains loan payments made on existing loans	0 to many
<i>Loan Forgive</i> – Contains loan forgiveness records	0 to many
<i>Debt</i> – Contains debt records (new debts incurred)	0 to many
<i>Debt Payment</i> – Contains debt payments made on existing debts	0 to many

In the flowing tables, in the “Format” column for each Element, please pay attention to “not null”. If a field is designated as “not null”, that field is required and must have a value. The omission of values for “not null” fields will be cause for file rejection.

The “Description” column and any “Notes” following an element table indicate which items are required and which items use Code Table values.

The <control> Element

Column	Format	Description
committeeID	char(11) not null	This is your 11 character committee ID or Key assigned by the Campaign Finance system. The committee ID or Key in the control element must match the committee that is logged in at the time the upload is submitted. Required. The committee ID or Key can be located on the Committee Administration page under Committee Information.
committeeName	char(100) not null	Committee full name. Required.
fileCreateDateTime	Date Time not null	Date file was created, time in 24 hour notation. Format CCYY-MM-DDThh:mm:ss. Required.
description	char(100) not null	Description of this upload file. The description is used to identify the upload file in the email confirmation sent back to the filer, as well as in the system Imported File History grid. It can be any text meaningful to you to help identify an individual upload file.
contribution	[complex type element]	zero to many occurrences
contributionReturn	[complex type element]	zero to many occurrences
expenditure	[complex type element]	zero to many occurrences
assocCandidate	[complex type element]	zero to many occurrences
assocBallotQuestion	[complex type element]	zero to many occurrences
expenditureReturn	[complex type element]	zero to many occurrences
loan	[complex type element]	zero to many occurrences
loanPayment	[complex type element]	zero to many occurrences
debt	[complex type element]	zero to many occurrences

debtPayment	[complex type element]	zero to many occurrences
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Control Element Notes:

Namespace: Each XML file will need xmlns="http://tempuri.org/XMLSchema.xsd" as an attribute of the "control" group.

The <contribution> Element

Column	Format	Description
contributionID	char(30) not null	This is your committee's unique external reference ID for this contribution record. Each contribution record must have its own unique identification number. Required.
cbElectionType	char(1) P = Primary G = General	This is the Election Type the Contribution is associated to. This is for Privately Financed Candidates Only. Required if (See Notes for when required).
cbContributionType	char(2) not null	This is the type of Contribution. See Code Table section for valid values. Required.
cbSourceType	char(2) not null	This is the type of Contributor. See Code Table section for valid values. Required.
cbOrgID	char(11)	The Committee Organization ID or Key in the Campaign Finance system of the contributor if the contributor is a registered committee in the state of Maine (PAC's, Party Committee's and BQC's only). See instructions <u>How to Obtain cbOrgID throughout this document</u> . Otherwise null (blank). Optional (See Notes)

Column	Format	Description
cbOrgName	char(100)	The Organization name of the contributor is Required if the contribution is from a Business, Commercial Source, Nonprofit Organization, Financial Institution or Non-Registered PAC, Party Committee or BQC. If from a <u>Registered PAC, Party Committee or BQC</u> you can use cbOrgID in place of cbOrgName.
cbContributorID	char(30)	This is your optional external ID for the contributor. It is highly recommended you use this to uniquely identify your contributors. The external ID you assign this contributor should be used each time this contributor contributes to your committee. This will reduce the possibility of having duplicate contributor records for the same contributor. <u><i>If a contributor also happens to be a source on any loan records, you should use the same ID in both instances.</i></u>
cbFirstName	char(100)	The contributor's first name if the contributor is an individual. See Notes for when required.
cbMiddleName	char(100)	The contributor's middle name if the contributor is an individual. Optional.
cbLastName	char(100)	The contributor's last name if the contributor is an individual. See Notes for when required.
cbNameSuffix	char(15)	The contributor's name suffix if the contributor is an individual. Optional.
cbAddress1	char(50)	Contributor address line 1. See Notes for when required.
cbAddress2	char(50)	Contributor address line 2. Optional
cbCity	char(30)	Contributor city. See Notes for when required.
cbState	char(2)	Contributor state abbreviation. See Notes for when required.
cbZip	char(5)	Contributor zip code. See Notes for when required.

Column	Format	Description
cbEmployer	char(100)	Contributor's employer name. See Notes for when required.
cbOccupation	char(2)	Contributor's occupation. See Code Table section for valid values. See Notes for when required.
cbOccupationOther	char(100)	If cbOccupation = 99 (Other) then cbOccupationOther (Description) is required.
cbEmpInfoRequested	Char (1) (Y)es	Employment Information Requested. Required if cbEmployer and cbOccupation are null.
cbDate	date not null	Contribution date – date contributed to committee. Required.
cbAmount	money not null	Contribution amount. Must be a valid dollar amount greater than 0.00. Required.
cbDescription	char(100)	Contribution Description – See Notes for when required.

Contribution Notes:

cbElectionType: Candidates Only - The Election Type is required for Privately Financed Candidates who are enrolled in a political party (Democratic, Green-Independent, or Republican), all contributions must be associated to an Election Type. Valid options are **(P)**Primary or **(G)**eneral. For all Unenrolled Candidates the Contributions are automatically associated to the General Election.

cbOrgID: This is the Committee Organization ID or Key in the Campaign Finance system of the Contributor, if the contributor is a registered Political Action Committee, Party Committee or Ballot Question Committee in the state of Maine.

NOTE: If the contributor is a Registered PAC, Party Committee or BQC in the state of Maine, you may use their **cbOrgID** or Key in the cbOrgID column. This will eliminate the necessity to include Organization Name and all address fields can be left blank. The orgID information may be retrieved from the [Export Organization List](#) found on the Committee Administration page under the Import Data File section.

cbOrgName, cbAddress1, cbCity, cbState, and cbZip: Organization Name, Address1, City, State and Zip of the Contributor is required if the cbContributionType is Monetary (Itemized), In-Kind (Itemized) or Other Receipts and the cbSourceType is one of the following: Business, Commercial Source, Political Action Committee, Political Party Committee, Ballot Question Committee, Nonprofit Organization or Financial Institution.

cbContributorID: This is your external reference ID for the contributor. This is optional but **highly recommended** to uniquely identify your contributors. It allows for more thorough validation, because the system can use it to identify prior contributions from the same contributor. *If a contributor also happens to be a source on any loan records, you should use the same ID in both instances. This will reduce the chance that duplicate contact records (contributor/source) will be created. .*

cbFirstName, cbLastName, cbAddress1, cbCity, cbState and cbZip: Contributor's Name and Address fields. Contributor's First Name, Last Name, Address 1, City, State and Zip are required when cbContributionType is Monetary (Itemized), In-Kind (Itemized) or Other Receipts and the cbSourceType is Candidate/ Spouse/ Domestic Partner, Individual or Other Candidate/ Candidate Committee.

cbEmployer and cbOccupation or cbEmpInfoRequested Contributor's Employer **and** Occupation **or** Employment Information Requested are required when Contribution Type is Monetary (Itemized), In-Kind (Itemized) or Other Receipts. and Contribution Source Type is Candidate/ Spouse/ Domestic Partner, Individual, Other Candidate/ Candidate Committee or Candidate/Candidate Committee.

cbEmpInfoRequested (Employment Information Requested) is Required if cbEmployer and cbOccupation are null.

cbDescription: Contribution Description - This is required for Contribution Types of In-Kind (Itemized), In-Kind (Unitemized) and Other Receipts, otherwise optional.

How To Obtain the ID of Existing Candidates and Committees

From the Import Manager page, click on the arrow which displays the label “Download Template”. Click on the link “Export Organizations”. Clicking on this link will open an excel spread sheet of all the active Candidates and Committees with their OrgID. This list should be used to look up values for the following columns or elements:

- “cnOrgID” in the “assocCandidate” worksheet or element
- “cbOrgID” in the “contribution” worksheet or element
- “exOrgID” in the “expenditure” worksheet or element
- “lnSourceOrgID” in the “loan” worksheet or element
- “dbOrgID” in the “debt” worksheet or element

The <contributionReturn> Element

Column	Format	Description
contributionReturnID	char(30) not null	This is your committee's unique external reference ID for the contribution return record. Each contribution return record must have its own unique identification number. Required.
contributionID	char(30) not null	This is the external reference ID assigned to the <u>original contribution record</u> . It is required, so that the returned contribution can be properly related to the original contribution. Required.
crDate	date not null	Date of return. Required
crAmount	money not null	Amount being returned. Required.
crExplanation	char(100)	Explanation of why the Contribution was returned. Required.

The <expenditure> Element

Column	Format	Description
expenditureID	char(30) not null	This is your committee's unique external reference ID for this expenditure record. Each expenditure record must have its own unique identification number. Required.
exPayeeType	char(2) not null	This is the Type of Payee. See Code Table section for valid values. Required.
exOrgID	char(11)	The Candidate or Committee Organization ID or Key in the Campaign Finance system of the payee if the payee is a registered candidate or committee in the state of Maine. <i>See instructions <u>How to Obtain exOrgID</u> throughout this document.</i> Otherwise null (blank). See Notes
exOrgName	char(100)	This is the payee organization name. Required if the exPayeeType is Business, Political Action Committee, Political Party Committee, Ballot Question Committee or Non-Profit Organization Payee.

Column	Format	Description
exPayeeID	char(30)	Your optional external ID for the payee. It is highly recommended you use this to uniquely identify your payees. The external ID you assign this payee should be used each time this payee is used. See Note section.
exFirstName	char(100)	Required if the exPayeeType is Individual Payee. Otherwise leave blank. This is the payee first name.
exMiddleName	char(100)	The payee's middle name if the exPayeeType is Individual Payee. Optional
exLastName	char(100)	Required if the exPayeeType is Individual Payee. Otherwise leave blank. This is the payee last name.
exNameSuffix	char(15)	The payee's name suffix if the exPayeeType is paid to an Individual Payee. Optional.
exAddress1	char(50) not null	Payee address line 1. Required.
exAddress2	char(50)	Payee address line 2. Optional
exCity	char(30) not null	Payee city. Required.
exState	char(2) not null	Payee state abbreviation. Required.
exZip	char(5) not null	Payee zip code. Required.
exPurpose	char(3) not null	Purpose of Expenditure – Required See Code Table section for valid values.
exDate	date not null	Expenditure date – Date expenditure was made or obligated. Required
exAmount	money not null	Expenditure amount. Must be a valid dollar amount greater than 0.00. Required.
exExplanation	char(150)	Explanation of Purpose– Required for all Expenditures except PAC, BQC & Party Expenditures with an Expenditure Purpose (exPurpose) of CON (Contribution to other candidate, committee, or organization). All other exPurposeTypes Require exExplanation. See Notes

Column	Format	Description
exSuppOppCan	char (1) (Y)es	(Y)es if the expenditure is to Support or Oppose a Candidate. (PAC, PARTY's only). For PAC, PARTY's only. (Y)es will also require additional information in the assocCandidate element. More than <u>ONE</u> associated candidate allowed per Expenditure. <i>If not a PAC or PARTY anything in this field will be ignored</i>
exIndependent	char(1) (Y)es	(Y)es if the expenditure is an Independent Expenditure. (PAC, PARTY's only) For PAC, PARTY's only. <i>If not a PAC or PARTY anything in this field will be ignored.</i>
exSuppOppBQ	char(1) (Y)es	(Y)es if the expenditure is to Support or Oppose a Ballot Question. (PAC's, PARTY's BQC's only) For PAC's, PARTY's and BQC's (Y)es will also require additional information in the assocBallotQuestion element. More than <u>ONE</u> associated BQ allowed per Expenditure. <i>If not a PAC, PARTY or BQC anything in this field will be ignored.</i>

Expenditure Notes

exOrgID: This is the Candidate Committee Organization ID or Key in the Campaign Finance system of the payee if the payee is a registered committee or candidate in the state of Maine.

NOTE: if the payee is a registered candidate or committee in the state of Maine, you may use their exOrgID or Key in the exOrgID column. This will eliminate the necessity to include any of the individual fields that pertain to the payee. Organization Name if the payee is an Organization, Payee First, Middle & Last Name if an Individual and all address fields. The orgID information may be retrieved from the Campaign Finance System Public Site – Candidate/Committee Search Detail page.

exPayeeID: This is your external reference ID for the payee. This is optional but **highly recommended** to uniquely identify your payees. The external ID you assign this payee should be used each time this payee is used.

exExplanation: Explanation of Purpose– Required for all Expenditures except PAC, BQC & Party Expenditures with an Expenditure Purpose (exPurpose) of CON (Contribution to other candidate, committee, or organization). All other exPurposeTypes require exExplanation. See Code Table for valid values.

exSuppOppCan: *This field pertains to PAC and Party Committees ONLY. More than “ONE” associated candidate allowed per Expenditure.*

If (Y)es the expenditure is to Support or Oppose a Candidate, you will also need to enter all associated Candidate information in the **assocCandidate** element.

If the expenditure is not to Support or Oppose (null)

exIndependent: *This field pertains to PAC and Party Committees ONLY. (Y)es if the expenditure is an independent expenditure.*

exSuppOppBQ: *This field pertains to PAC, Party Committees and **Ballot Question Committees ONLY.***

More than “ONE” associated BQ allowed per Expenditure.

(Y) if the expenditure is to Support or Oppose a Ballot Question.

If (Y)es the expenditure is to Support or Oppose a Ballot Question, you will also need to enter all associated Ballot Question information in the **assocBallotQuestion** element.

INFORMATION: For detailed information on the definition and reporting requirements for Expenditures to Support or Oppose Candidates, Independent Expenditures and Expenditures to Support or Oppose Ballot Questions please contact the State of Maine Commission on Governmental Ethics and Election Practices.

How To Obtain the ID of Existing Candidates and Committees

From the Import Manager page, click on the arrow which displays the label “Download Template”. Click on the link “Export Organizations”. Clicking on this link will open an excel spread sheet of all the active Candidates and Committees with their OrgID. This list should be used to look up values for the following columns or elements:

- “cnOrgID” in the “assocCandidate” worksheet or element
- “cbOrgID” in the “contribution” worksheet or element
- “exOrgID” in the “expenditure” worksheet or element
- “lnSourceOrgID” in the “loan” worksheet or element
- “dbOrgID” in the “debt” worksheet or element

The <assocCandidate> Element

Column	Format	Description
assocCandidateID	char(30) not null	This is the unique external reference ID for the Associated Candidate record. Each individual candidate record must have its own unique identification number. Required if the original expenditure, expenditure return or debt was to Support or Oppose a Candidate.
expenditureID	char(30)	This is the committee's unique external reference ID you <u>assigned to the original expenditure record</u> . Required if the expenditure was to Support or Oppose a Candidate.
debtID	char(30)	This is the committee's unique external reference ID. Important: Leave blank. Associated candidates are no longer entered for debts.
cnOrgID	char(100) not null	Organization ID of the Candidate that is Supported or Opposed by the Expenditure, Debt or Expenditure Return. Required <i>See instructions <u>How to Obtain cnOrgID</u> throughout this document.</i>
cnAmount	money not null	Amount spent in Support of or Opposition to the individual Candidate. Required.
cnSuppOpp	char(1) (S)upport (O)ppose	(S)upport if the Expenditure, Debt or Expenditure Return was in support of the Candidate. (O)ppose if the Expenditure, Debt or Expenditure Return was in Opposition to the Candidate.

Associated Candidate Notes

More than ONE Associated Candidate allowed per Expenditure or Debt.

INFORMATION: For detailed information on the definition and reporting requirements for Expenditures to Support or Oppose Candidates, Independent Expenditures and Expenditures to Support or Oppose Ballot Questions please contact the State of Maine Commission on Governmental Ethics and Election Practices.

How To Obtain the ID of Existing Candidates and Committees

From the Import Manager page, click on the arrow which displays the label “Download Template”. Click on the link “Export Organizations”. Clicking on this link will open an excel spread sheet of all the active Candidates and Committees with their OrgID. This list should be used to look up values for the following columns or elements:

- “cnOrgID” in the “assocCandidate” worksheet or element
- “cbOrgID” in the “contribution” worksheet or element
- “exOrgID” in the “expenditure” worksheet or element
- “InsourceOrgID” in the “loan” worksheet or element
- “dbOrgID” in the “debt” worksheet or element

The <assocBallotQuestion> Element

Column	Format	Description
assocBallotQuestionID	char(30) not null	This is the unique external reference ID for the Associated Ballot Question record. Each individual Ballot Question must have its own unique identification number. Required if the original expenditure or expenditure return was to Support or Oppose a Ballot Question..
expenditureID	char(30)	This is the committee's unique external reference ID <u>you assigned to the original expenditure record</u> . Required if the expenditure was to Support or Oppose a Ballot Question. (exSuppOppBQ is (Y)es)
bQuestion	char(500) not null	This is the Ballot Question the Expenditure, Debt or Return is in Support of or Opposition to. Required
bQAmount	money not null	Amount spent in Support of or Opposition to the individual Ballot Question.. Required.
bQSuppOpp	char(1) (S)upport (O)ppose Not null	(S)upport if the Expenditure, Debt or Expenditure Return was in support of the Ballot Question. or; (O)ppose if the Expenditure, Debt or Expenditure Return was in Opposition to the Ballot Question. Required

Associated Ballot Question Notes

More than ONE Associated Ballot Question allowed per Expenditure or Debt.

INFORMATION: *For detailed information on the definition and reporting requirements for Expenditures to Support or Oppose Candidates, Independent Expenditures and Expenditures to Support or Oppose Ballot Questions please contact the State of Maine Commission on Governmental Ethics and Election Practices.*

The <expenditureReturn> Element

Column	Format	Description
exReturnID	char(30) not null	This is your committee's unique external reference ID for the expenditure return record. Each expenditure return record must have its own unique identification number. Required.
expenditureID	char(30) not null	This is the unique external reference ID assigned to the <u>original expenditure record</u> . It is required, so that the returned expenditure can be properly related to the original expenditure. Required.
exRetAmount	money not null	Amount being returned. Required.
exRetDate	date not null	Date of return. Required.
exRetExplanation	char(100)	Explanation of why the expenditure is being returned. Required.

Expenditure Return Notes

No associated candidate or ballot question element is needed for "Returned" Expenditure.

The <loan> Element

Column	Format	Description
loanID	char(30) not null	This is your committee's unique external reference ID for the loan. Each loan record must have its own unique identification number. Required.
InElectionType	char(1) (P)primary (G)eneral	This is the Election Type the Loan is associated to. This is for Privately Financed Candidates Only. See Notes for when required.
InSourceType	char(2) not null	This is the source of the Loan (lender type). See Code Table section for valid values. Required.
InSourceOrgID	char(30)	The Candidate or Committee Organization ID or Key in the Campaign Finance system of the loan source (lender) if the loan source is a registered candidate or committee in the state of Maine. See <i>instructions How to Obtain InSourceOrgID throughout this document</i> .
InSourceOrgName	char(100)	This is the loan source organization name. Required if the InSourceType is Commercial Source, Non-profit organization, Political Action Committee, Political Party Committee, Ballot Question Committee, Other candidate/candidate committee or Financial Institution.
InSourceReferenceID	char(10)	This is your committee's optional unique external ID for the loan source. It is highly recommended you use this to uniquely identify your loan source (Lender). The external ID you assign this loan source should be used each time this source makes a loan to your committee. This will reduce the possibility of having duplicate loan source records for the same source. <i>If a Loan Source also happens to be a contributor on any contribution records, you should use the same ID in both instances.</i>
InSourceFirstName	char(100)	Lender's First Name Required if Loan Source Type is "Candidate/Spouse/Domestic Partner", "Individual" or "Other Candidate/Candidate Committee"
InSourceMiddleName	char(100)	Lender's Middle Name

Column	Format	Description
		Optional
InSourceLastName	char(100)	Lender's Last Name Required if Loan Source Type is "Candidate/Spouse/Domestic Partner", "Individual" or "Other Candidate/Candidate Committee"
InSourceSuffix	char(15)	Lender's name suffix. Optional
InSourceAddress1	char(50) not null	Loan source (lender) address line 1. Required
InSourceAddress2	char(50)	Loan source (lender) address line 2. Leave blank if no Address Line 2 in address.
InSourceCity	char(30) not null	Loan source (lender) city. Required
InSourceState	char(2) not null	Loan source (lender) state abbreviation. Required
InSourceZip	char(5) not null	Loan source (lender) zip code. Required
InSourceEmployer	char(100)	Loan Source employer name. See Notes for when required.
InSourceOccupation	char(2)	Loan Source occupation. See Code Table section for valid values. See Notes for when required.
InSourceOccupationOther	Char(100)	If InSourceOccupation = 99 (Other) then InSourceOccupationOther (Description) is required.
InSourceEmpInfoRequested	Char (1) (Y)es	Employment Information Requested. Required if InSourceEmployer and InSourceOccupation are null.
InDescription	Char(100)	Description of Loan. Optional
InDate	date not null	Date of loan. Required.
InAmount	money not null	Amount of loan. Required.

Loan Notes

InElectionType: The Election Type is required for Privately Financed Candidates who are enrolled in a political party (Democratic, Green-Independent, or Republican), all loans must be associated to a Election Type. Valid options are **(P)**Primary or **(G)**eneral. For all Unenrolled Candidates the loans are automatically associated to the General Election.

InSourceOrgID: This is the Candidate or Committee Organization ID or Key in the Campaign Finance system of the loan source (Lender), if the loan source is a registered candidate or committee in the state of Maine.

***NOTE:** If the loan source (lender) is a Registered Candidate or Committee in the state of Maine, you may use their **InSourceOrgID** or Key in the **InSourceOrgID** column. This will eliminate the necessity to include any of the individual fields that pertain to the lender. Organization Name if lender is an Organization, Lender First, Middle & Last Name if an Individual, all address fields, as well as all employment information, can be left blank. For instructions on how to obtain the **InSourceOrgID** see instructions [How to Obtain InSourceOrgID](#) throughout this document. Otherwise null (blank).*

InOrgName, InAddress1, InCity, InState, and InZip: Organization Name and Address1, City, State and Zip of the Loan Source and is required if the InSourceType is one of the following: Commercial Source, Non-profit organization, Political Action Committee, Political Party Committee, Ballot question committee, Other candidate/candidate committee or Financial Institution.

InSourceReferenceID: This is your external reference ID for the loan source. This is optional but **highly recommended** to uniquely identify your loan sources. *If a loan source (lender) also happens to be a contributor on any contribution records, you should use the same ID in both instances.*

InFirstName, InLastName, InAddress1, InCity, InState and InZip:

Loan Source's Name and Address fields. Loan source's First Name, Last Name, Address 1, City, State and Zip are required when InSourceType is Individual, Candidate/ Spouse/ Domestic Partner, or Other Candidate/ Candidate Committee.

InEmployer and InOccupation : Lender's Employer and Occupation are required when Loan Source Type is Individual, Candidate/ Spouse/ Domestic Partner, Other Candidate/ Candidate Committee.

InSourceEmpInfoRequested: (Employment Information Requested) is Required if InSourceEmployer and InSourceOccupation are null.

InDescription: Description of Loan.

InSourceOccupationOther: Loan Source Occupation if “Other” – Specify - is required, if the Loan Source Occupation = Other (99).

How To Obtain the ID of Existing Candidates and Committees

From the Import Manager page, click on the arrow which displays the label “Download Template”. Click on the link “Export Organizations”. Clicking on this link will open an excel spread sheet of all the active Candidates and Committees with their OrgID. This list should be used to look up values for the following columns or elements:

- “cnOrgID” in the “assocCandidate” worksheet or element
- “cbOrgID” in the “contribution” worksheet or element
- “exOrgID” in the “expenditure” worksheet or element
- “InSourceOrgID” in the “loan” worksheet or element
- “dbOrgID” in the “debt” worksheet or element

The <loanPayment> Element

Column	Format	Description
loanPaymentID	char(30) not null	This is your committee's unique external reference ID for the loan payment record. Each loan payment record must have its own unique identification number. Required.
loanID	char(30) not null	This is your committee's unique external reference ID you assigned to the original loan record. It is used to associate the payment to the correct loan. Required.
InPaymentDate	date not null	Date of payment. Required.
InPaymentAmount	money not null	Amount of loan payment. Required. Enter 0.00 if none.

The <loanForgive> Element

Column	Format	Description
loanForgiveID	char(30) not null	This is your committee's unique external reference ID for the loan forgiveness record. Each loan forgiveness record must have its own unique identification number. Required.
loanID	char(30) not null	This is your committee's unique external reference ID you assigned to the original loan record. It is used to associate the forgiveness record to the correct loan. Required.
loanForgivenDate	date not null	Loan Forgiven date. Required.
InAmtForgiven	decimal	Amount of the Loan that is being forgiven. Required.

The <debt> Element

Column	Format	Description
debtID	char(30) not null	This is your committee's unique external reference ID for the debt record. Each debt record must have its own unique identification number. Required.
dbPayeeType	char(2) not null	See Code Table section for valid values. Required.
dbOrgID	char(30)	This is the payee organization name. Required if the dbPayeeType is Commercial Source, Non-profit Organization, Political Action Committee, Political Party Committee, Ballot Question Committee, Other candidate/candidate committee or Financial Institution. <i>See instructions How to Obtain dbOrgID throughout this document.</i>
dbOrgName	char(100)	Required if the debt is owed to an organization, not an individual payee. Otherwise leave this blank. This is the payee organization name
dbPayeeID	char(30)	Your optional external ID for the payee. It is highly recommended you use this to uniquely identify your payees. The external ID you assign this payee should be used each time this payee is used.
dbFirstName	char(100)	Required if the debt is owed to an individual payee, not an organization. Otherwise leave this blank. This is the payee first name.
dbMiddleName	char(100)	The payee's middle name if the debt is owed to an individual. Optional
dbLastName	char(100)	Required if the debt is owed to an individual, not an organization. Otherwise leave this blank. This is the payee last name.
dbNameSuffix	char(15)	The payee's name suffix if the debt is owed to an individual. Optional.
dbAddress1	char(50) not null	Payee address line 1. Required.

Column	Format	Description
dbAddress2	char(50)	Payee address line 2. Required if available as part of address, otherwise leave blank.
dbCity	char(30) not null	Payee city. Required.
dbState	char(2) not null	Payee state abbreviation. Required.
dbZip	char(5) not null	Payee zip code. Required.
dbPurpose	char(3) not null	Purpose of Debt – Required See Code Table section for valid values.
dbDate	date not null	Debt date – date debt was incurred. Required.
dbAmount	money not null	Debt amount. Must be a valid dollar amount greater than 0.00. Required.
dbExplanation	char(100)	Debt Explanation. Required
dbEstimate	char(1) (Y)es	Important: Leave blank as this field is no longer used.
dbIndependent	char(1) (Y)es	Important: Leave blank as this field is no longer used.

Debt Notes

If your Debt Payee Type is a Registered Committee in the state of Maine, you may use their **orgID** or Key in the dbOrgID column in this case it is not necessary to include **dbOrgName, dbAddress1, dbCity, dbState, and dbZip.**

More than ONE Associated Candidate allowed per Debt.

INFORMATION: For detailed information on the definition and reporting requirements for Expenditures to Support or Oppose Candidates, Independent Expenditures and Expenditures to Support or Oppose Ballot Questions please contact the State of Maine Commission on Governmental Ethics and Election Practices.

How To Obtain the ID of Existing Candidates and Committees

From the Import Manager page, click on the arrow which displays the label “Download Template”. Click on the link “Export Organizations”. Clicking on this link will open an excel spread sheet of all the active Candidates and Committees with their OrgID. This list should be used to look up values for the following columns or elements:

- “cnOrgID” in the “assocCandidate” worksheet or element
- “cbOrgID” in the “contribution” worksheet or element
- “exOrgID” in the “expenditure” worksheet or element
- “lnSourceOrgID” in the “loan” worksheet or element
- “dbOrgID” in the “debt” worksheet or element

The <debtPayment> Element

Column	Format	Description
dpPaymentID	char(30) not null	This is your committee's unique external reference ID for the debt payment record. Each debt payment record must have its own unique identification number. Required
debtID	char(30) not null	This is your committee's unique external reference ID for the original debt record. . Required.
dpPaymentDate	date not null	Date of debt payment. Required.
dpPartialPayment	Char(1) (Y)es	(Y)es if the payment is a Partial Payment.
dpPaymentAmount	money not null	Amount of debt payment. Required. Enter 0.00 if none.

CODE TABLES

The following import codes should be used where applicable with the XML file. *Contributions*

cbElectionType (type of election)

Code	Import Code
Primary	P
General	G

cbNameSuffix (type of suffix)

Code	Import Code
Jr	Jr
Sr	Sr
II	II
III	III
IV	IV
Phd	Phd

cbContributionType (type of contribution)

Code	Import Code
Monetary (Itemized)	01
Monetary (Unitemized)	02
In-Kind (Itemized)	03
In-Kind (Non-Itemized)	04
Other Receipts	05

When cbContributionType = 02 Monetary (Unitemized) or 04 In-Kind (Unitemized) please use only the cbSourceType(s) listed below.

For PAC's valid Source Types when Contribution Type = 02 or 04	Import Code
General Treasury Transfer	10
Contributors giving \$50 or less	12

For BQC's valid Source Types when	Import
<i>Contribution Type = 02 or 04</i>	Code
General Treasury Transfer	10
Contributors giving \$ 50 or less	12
For Party Committees valid Source Types	Import
<i>when Contribution Type = 02 or 04</i>	Code
Contributors giving \$200 or less	14
For Candidates (Traditional & MCEA) valid	Import
<i>Source Types when Contribution Type = 02 or</i>	Code
<i>04</i>	
Transfer from Previous Campaign	11
Contributors giving \$50 or less	12

cbSourceType (type of contributor)

Note: All cbSourceType(s) are **not** valid for all Committee Types.
See tables below.

Valid cbSourceType - Committee Type combinations

For PAC's	Import Code
Individual	01
Commercial Source	03
Nonprofit Organization	04
Political Action Committee	05
Political Party Committee	06
Ballot Question Committee	07
Candidate/ Candidate Committee	09
General Treasury Transfer	10
Contributors giving \$50 or less	12
Financial Institution	16

For BQC's	Import Code
Individual	01
Commercial Source	03
Nonprofit Organization	04
Political Action Committee	05
Political Party Committee	06
Ballot Question Committee	07
Candidate/ Candidate Committee	09
General Treasury Transfer	10
Contributors giving \$ 50 or less	12
Financial Institution	16

For Party Committees	Import Code
Individual	01
Commercial Source	03
Nonprofit Organization	04
Political Action Committee	05
Political Party Committee	06
Ballot Question Committee	07
Candidate/ Candidate Committee	09
Contributors giving \$200 or less	14
Financial Institution	16

For Traditional Candidates	Import Code
Individual	01
Candidate/ Spouse/ Domestic Partner	02
Commercial Source	03
Nonprofit Organization	04
Political Action Committee	05
Political Party Committee	06
Ballot Question Committee	07
Other Candidate/Candidate Committee	08
Transfer from Previous Campaign	11
Contributors giving \$50 or less	12
Financial Institution	16

For MCEA Candidates	Import Code
Individual	01
Candidate/ Spouse/ Domestic Partner	02
Transfer from Previous Campaign	11
Contributors giving \$50 or less	12
Interest	21

cbOccupation (contributor's occupation)

Code	Import Code
Agriculture	01
Attorney/Legal	02
Automotive Industry	03
Clergy/Faith-based	04
Construction/Engineering	05
Consultant	06
Environmental Services	07
Financial/Investment	08
Firefighters/Paramedics	09
Food Services	10

Gaming Industry	11
General Business	12
Government/Civil	13
Healthcare/Medical	14
Homemaker	15
Insurance Industry	16
Law Enforcement	17
Lobbyist	18
Manufacturing	19
Media/Public Relations	20
Military	21
Mining/Energy	22
Not Currently Employed	23
Office and Administrative Occupations	24
Real Estate Professional	25
Retail Sales	26
Retired	27
Science/Technology	28
Student	29
Teacher/Education	30
Unknown	31
Other	99

Expenditures

exPayeeType (type of payee)

Note: Import Codes in this table will not appear in Sequential Order.

All exPayeeType(s) are **not** valid for all Committee Types. See valid exPayeeType Committee Type combinations.

Valid exPayeeType - Committee Type combinations

PAC's, Party Committees, BQC's Traditional Candidates	Import Code
Political Action Committee	05
Political Party Committee	06
Ballot Question Committee	07
Business	17
Non-Profit Organization Payee	18
Individual Payee	19

PAC's, Party Committees and BQC's only	Import Code
Candidate Payee	20

MCEA Candidates	Import Code
Business	17
Non-Profit Organization Payee	18
Individual Payee	19

exPurpose (purpose of expenditure)

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

Loans

InSourceType (type of loan source)

Note: Import Codes in this table will not appear in Sequential Order. All InSourceType(s) are **not** valid for all Committee Types. See valid InSourceType Committee Type combinations.

Valid InSourceType - Committee Type combinations

For PAC, BQC and Party Committees	Import Code
Individual	01
Commercial Source	03
Nonprofit Organization	04
Political Action Committee	05
Political Party Committee	06
Ballot Question Committee	07
Financial Institution	16

For Traditional Candidates	Import Code
Individual	01
Candidate/ Spouse/ Domestic Partner	02
Commercial Source	03
Nonprofit Organization	04
Political Action Committee	05
Political Party Committee	06
Ballot Question Committee	07
Other Candidate/Candidate Committee	08
Financial Institution	16

For MCEA Candidates	Import Code
Individual	01
Candidate/ Spouse/ Domestic Partner	02

InSourceOccupation (loan source's occupation)

Code	Import Code
Agriculture	01
Attorney/Legal	02
Automotive Industry	03
Clergy/Faith-based	04
Construction/Engineering	05
Consultant	06
Environmental Services	07
Financial/Investment	08
Firefighters/Paramedics	09
Food Services	10
Gaming Industry	11
General Business	12
Government/Civil	13

Healthcare/Medical	14
Homemaker	15
Insurance Industry	16
Law Enforcement	17
Lobbyist	18
Manufacturing	19
Media/Public Relations	20
Military	21
Mining/Energy	22
Not Currently Employed	23
Office and Administrative Occupations	24
Real Estate Professional	25
Retail Sales	26
Retired	27
Science/Technology	28
Student	29
Teacher/Education	30
Unknown	31
Other	99

InElectionType (type of election)

Code	Import Code
Primary	P
General	G

Debts

dbPayeeType (debt payee)

Note: Import Codes in this table will not appear in Sequential Order All dbPayeeType(s) are **not** valid for all Committee Types. See valid dbPayeeType Committee Type combinations.

Valid dbPayeeType - Committee Type combinations

PAC's, Party Committees, BQC's Traditional Candidates	Import Code
Political Action Committee	05
Political Party Committee	06
Ballot Question Committee	07
Business	17
Non-Profit Organization Payee	18
Individual Payee	19

PAC's, Party Committees & BQC's only	Import Code
Candidate Payee	20

MCEA Candidates	Import Code
Business	17
Non-Profit Organization Payee	18
Individual Payee	19

dbPurpose (purpose of debt)

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