



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

To: Commission
From: Commission Staff
Date: November 21, 2022
Re: American Leadership Committee-Maine PAC

At the Commission's October 26, 2022 meeting, it considered two complaints concerning mailings and digital advertisements paid for by the American Leadership Committee-Maine ("PAC"). The complainants asserted that the communications did not identify the top three funders of the PAC, which is required in Maine for mailings and internet video advertisements made through independent expenditures (IEs). Rather than identifying specific funders, the communications included the phrase "No top donors." The Commission determined that the PAC violated 21-A M.R.S. § 1014(2-B) and Chapter 1, § 7(12)(D) of the Commission's rules by not including the top 3 donors in the communications. The Commission also discussed an IE report filed with the Commission on October 14, 2022, which listed an expenditure date of October 12, 2022 for an \$18,146 payment for mailings. The Commission determined that the report did not comply with 21-A M.R.S. 1019-B(4), and deferred any consideration of penalties on both issues until its next meeting.

The PAC submitted a letter on November 16, 2022 to address the penalty issues. The complete materials for this agenda item are attached in chronological order of submission. Please refer to the PAC's letter, which is included at the back of the packet just before the statute and rules. This staff memo focuses on new information and arguments received since your October 26, 2022 meeting.

FACTUAL UPDATE

On the afternoon directly following the Commission's October 26, 2022 meeting, the PAC's counsel sought advice from the Commission staff concerning which three funders should be disclosed in future IE communications. Recognizing that the PAC wanted to take immediate

action, Commission staff conferred with agency counsel about the safest course of action for the PAC. We advised that the PAC should use the top three funders of the Democratic Legislative Campaign Committee (DLCC) and not restrict the disclosure to donations deposited in DLCC’s Low Individual Account. Since then, the PAC has been using the following disclaimer in its independent expenditure communications:

The top 3 funders of American Leadership Committee-Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers.

For your information, the PAC has amended four of the five IE reports received before your last meeting. The costs of the communications containing the “No top donors” disclosure are now reported as:

| Filed | Original Amount | Amended Amount | Change | Expenditure Type | Districts Affected |
|---------------|------------------------|-----------------------|-------------------|----------------------------------|---------------------------|
| 10/5/2022 | \$149,000.00 | \$151,950.65 | \$2,950.65 | Social Media, Online Advertising | 25 |
| 10/14/2022 | \$18,146.44 | \$ 16,997.01 | \$1,149.43 | Direct Mail | 10 |
| 10/19/2022 | \$38,497.47 | \$ 36,045.14 | \$2,452.33 | Direct Mail | 25 |
| 10/22/2022 | \$125,000.00 | Not amended | n/a | Social Media, Online Advertising | 25 |
| 10/23/2022 | \$17,885.36 | \$ 16,165.78 | \$1,719.58 | Direct Mail | 10 |
| Totals | \$348,529.27 | \$346,158.58 | \$2,370.69 | | |

TOP 3 FUNDER REQUIREMENT

Summary of PAC’s Initial Response on Top Funder Issue

For the Commission’s October 26, 2022 meeting, the PAC explained that it is fully funded by the DLCC, which is a separate nonprofit corporation. The DLCC attributes each expenditure it has funded to specific contributions. Once a contribution is marked as spent in a particular state, the contribution will not be attributed to spending in other states. The DLCC has adopted this methodology to avoid double-counting contributions in reports made to different states.

The PAC responded that, under the Commission’s rules, the top 3 funder statement was required to disclose the top funders of the DLCC, which fully funds the PAC. The DLCC had attributed its IEs in Maine to specific donors that gave under \$1,000. Those donations had been

deposited in the DLCC's Low Individual Account. Because these donors were under a threshold of \$1,000, they did not need to be disclosed as top funders.

The top 3 funder provision allows an independent spender to disregard certain funders for purposes of determining the three highest sources of funding since the last general election:

D. When compiling the list of top funders, an entity making an independent expenditure may disregard any funds that the entity can show were used for purposes unrelated to the candidate mentioned in the communication on the basis that funds were either spent in the order received or were strictly segregated in other accounts.

§ 1014(2-B)(D). Counsel asserts that the PAC understood this to mean that it could attribute its IEs in Maine to certain contributors through a reasonable accounting method, which is explicitly allowed in the campaign finance law of other states.

Summary of PAC's November 16, 2022 Submission

In its November 16, 2022 letter, the PAC describes its activities to correct its disclaimers. It cancelled a set of mailings costing \$22,462.99. It affixed a new disclosure statement on another set of mailings. The PAC describes its efforts to upload new digital ads with a revised disclaimer on Hulu, YouTube, and Facebook and the vendors' business practices which did not allow for changes to take effect immediately.

The PAC explains that it used its standard methodology to attribute donors to specific expenditures, which has been developed to assure that no donors are double counted. It denies that it had any incentive or desire to shield its donors. The PAC states that it would have gladly disclosed the DLCC as its top donor but that was foreclosed by the Commission's rule.

New Correspondence from Kim Pettengill and William Clardy

The Commission received additional correspondence from Kim Pettengill and William Clardy commenting on the severity of the violation and documenting that communications with the "No top donors" disclosure continued to be available to the public even after the Commission's October 26 meeting. Those are attached for your consideration. The Commission staff also received emails from one of the Republican candidates opposed, Rep. Corey Wilson,

stating that the incorrect disclosure was on internet video advertising available to the public as late as 3:58pm on October 29, 2022.

Staff Recommendation

The purpose of the top 3 funder disclosure statement for independent expenditure communications is to provide members of the public who have received communications advocating for and against candidates with information about the organization that funded the communication. PAC names often provide little information about the interest group(s) that formed the PAC. Disclosing the PAC's funders potentially will result in additional relevant information available to the public in a very immediate way. The top 3 funder disclosure relates to the organization making the independent expenditure, not a specific communication.

In the opinion of the Commission staff, the PAC did make genuine efforts to amend its disclosures in communications distributed after the Commission's October 26 meeting. This remediation did not completely cure the non-compliant disclosure message in the communications sent before the meeting.

The PAC highlights what it describes as different opinions on interpreting the statute. Both Commission and staff were operating under considerable time pressure in preparing for the October 26 meeting. It would not be surprising if different viewpoints were discussed at the October 26 meeting. That is part of deliberation. The Commission was unanimous in determining that "No top donors" was noncompliant.

Balancing a number of factors, the Commission staff recommends a penalty of \$10,000 for the following reasons:

(1) The disclosure in this case was the opposite of what the law intended. Title 21-A, § 1014(2-B) calls on independent spenders to disclose their three *highest* funding sources since the last general election. The basic concept is not complicated. The statute gives independent spenders the option of excluding two well-defined categories of funders, which are not applicable in this case. The DLCC used a methodology which resulted in the assigning the costs of Maine IEs to the DLCC's smaller donors who gave between \$5 and \$100. This outcome was in opposition to the informational purposes of the statute.

(2) Sophistication of the PAC. The DLCC is a large campaign organization with annual revenues exceeding \$20 million and access to campaign finance expertise. It employs staff who

are dedicated to complying with state campaign finance laws. It has very capable campaign finance counsel who have consulted the Commission staff in previous election years. It is well qualified to understand what 21-A M.R.S. § 1014(2-B) required. If the PAC or counsel found § 1014(2-B) ambiguous or confusing, it could have sought advice from the Commission.

(3) *Using “No Top Donors” in Maine IE communications was not a sound compliance strategy.* The PAC chose a message (“No Top Donors”) that gave voters no information whatsoever about the funding sources for the PAC. In the opinion of the Commission staff, this was bound to attract negative attention and was risky. It is a tenuous interpretation of § 1014(2-B)(D) to conclude the DLCC could exclude funding sources because they were reported as contributors in other states. That is not contemplated by the language of § 1014(2-B)(D). The PAC should have deviated from the DLCC’s regular methodology to list the DLCC’s top funders, as Maine law required.

(4) *Public harm.* The first three sets of mailings were sent to 58,860 recipients. An unknown number of voters viewed the digital advertisements. People viewing the communications did not receive any meaningful information about funding sources. The extent of public harm from the missing disclosure should be considered when assessing a penalty.

(4) *Context of circumvention.* In deciding on a penalty in this case, the Commission should consider that some political organizations are motivated to shield their donors from public view. The PAC strenuously denies this was its intent, but that is part of the context of regulating how political campaigns are financed. Regardless of the DLCC’s level of good faith, the Commission should not assess a small penalty based on a compliance theory that a PAC can pick its accounting method to exclude donors from the top 3 funder disclosures. Taking a stricter view will promote compliance by others in the long run.

(5) *Proportionality.* Since the 2000s, the Commission has regularly received criticism that its penalties are too low and constitute “a slap on the wrist” or “the cost of doing business” for organizations with large campaign budgets. This is one of the reasons that the election reform advocates proposed increased penalties for disclosure violations in their 2015 initiative, and the 2018 members of this Commission reacted by increasing penalties. For an organization that spent \$346,000 on noncompliant communications in Maine, a penalty of less than \$10,000 would not send the correct deterrence message.

EXPENDITURE DATE ISSUE

Definition of Expenditure

The term “expenditure” includes “a purchase, payment, distribution, loan, advance, deposit or gift of money anything of value made for the purpose of initiating or influencing a campaign,” and “a contract, promise, or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure for the purposes set forth in this paragraph.” 21-A M.R.S. §§ 1052(4)(A)(1)&(2). The Commission has adopted a rule (Chapter 1, § 7(3)) confirming that placing an order for a good or service constitutes reportable expenditure, even if the order has not been paid for:

3. Reporting Debts and Unpaid Obligations

- A. The following events constitute expenditures, even if the payment for a good or service has not been made at the time of the event:
 - (1) The placement of an order for a good or service;
 - (2) The signing of a contract for a good or service;
 - (3) The acceptance of the delivery of a good or the performance of a service by a vendor; or
 - (4) A promise or an agreement (including an implied one) that a payment will be made in exchange for a good or service.

- B. For reporting purposes, the expenditures listed in paragraph A are designated as debts or obligations prior to payment for the goods or services being made.

- C. If a person required to file a campaign finance report has a debt or obligation which remains unpaid at the end of the report period, the person shall report the date, amount, vendor, and purpose of the debt or obligation. If the exact amount is not known, the person filing the report shall report an estimate of the amount (preferably obtained in a written statement from the vendor).

94-270 C.M.R. ch. 1 § 7(3). In accordance with this rule, the Commission’s eFiling system is designed so that an independent spender may indicate that it is reporting an unpaid debt or obligation, rather than a payment.

Staff Recommendation

On Friday, October 14, 2022 the PAC filed an IE report that disclosed an October 12 expenditure of \$18,146 to Moxie Media for mailings. Because some mailings were received on

October 14 and it takes time to print and mail literature, the staff questioned whether the reported expenditure date of October 12 was correct under the Commission’s statutes and rule. Because we thought there could be a factual or interpretive error in reporting that date, the staff invited the PAC to review the facts and amend the report if necessary. The PAC maintained that October 12 was the date of the expenditure. In correspondence to the Commission, the PAC has provided the following dates during the first two weeks of October:

| | | | | | | |
|---|--|-------------------------------------|--|---|--|--|
| 2 | 3 | 4 PAC approved design of mailers | 5 Moxie Media transmitted design to printer | 6 | 7 | 8 PAC received invoice for printing and design by email |
| 9 | 10 PAC’s IE director approved invoice for payment Mailers were printed | 11 | 12 PAC paid for postage (PAC contends expenditure was final on this date, which is the date of the expenditure) | 13 Mailings deposited with U.S. Postal Service | 14 Mailings began to be received by voters IE report filed | 15 |

The PAC argues that the date of the expenditure is October 12, 2022 (the date it paid for postage) explaining:

For [designed mailings] that do make it to print, ALC may take advantage of bulk printing discounts to print mailers for a group of candidates, but ultimately send mailers to just some of the candidates depending on the available budget for postage. Postage is pre-paid, but design and printing costs are paid 60 days in arrears. ALC generally considers an expenditure final when postage has been paid, as it is unlikely to be cancelled after that date.

The Commission staff agrees with comments made at the October 26 meeting that a PAC could incur polling, creative, or design costs toward the production of a mailing, and those costs should not be reported as IEs until it is known that communication will be sent. There is no policy disagreement that need to be settled on this point.

The current Commission staff cannot recall previously receiving the argument that once postage, printing and design costs for a mailing have been *approved for payment* and printing has been *completed*, no IE report would be due because there is a mere possibility that the spender could decline to send a subset of the mailings for reasons of budget.

In the Commission staff's view, the PAC has provided little specific evidence to support the proposition that some the October 13th mailings would not be sent. The PAC has cited no specific historical examples of campaign literature that was printed at the direction of ALC-ME or DLCC and was not subsequently mailed. The PAC states that, generally, even after mailings are printed, they may not be sent "depending on the available budget for postage." This year, the PAC spent the large sum of \$386,300 to support Democratic candidates for the Maine Legislature. Recently, the DLCC's annual receipts have exceeded \$20,000,000. The PAC has not presented reasons to believe that the PAC would have held back some of the mailings to reduce the cost of \$18,146.

The Commission staff believes a conservative application of 21-A M.R.S. §§ 1052(4)(A)(2) and Chapter 1, § 7(3)(A) supports a conclusion that the date of the expenditure for the mailings was Monday, October 10, the date when the PAC approved the payment of \$18,146 for postage, printing and design, and when the printing services were rendered.

If that is accepted by the Commission, the IE report was due Wednesday, October 12 and the report was filed two days late. Applying the formula in 21-A M.R.S. § 1020-A(4), the preliminary penalty would be \$679.88 (2% of the amended report total of \$16,997.01, multiplied by two). The Commission could decide whether any waiver was warranted under § 1020-A(2).

Thank you for your consideration.

From: Mary Small <votemyway@yahoo.com>
Sent: Tuesday, October 18, 2022 4:15 PM
To: Wayne, Jonathan <Jonathan.Wayne@maine.gov>
Subject: Complaint

Mr. Jonathan Wayne
Executive Director
Maine Ethics Commission
135 State House Station
Augusta, Maine 04333

October 17, 2022

Dear Mr. Wayne,

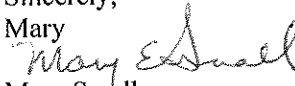
I am writing to file a complaint against American Leadership Committee Maine. The disclaimer on their false mailer against Linda Baker (attached) said no top donors however a quick search on Maine Campaign Finance shows their top and apparently only donor is the Democratic Legislative Campaign Committee in the amount of \$56,400.

This mailer was clearly sent out by the Democratic Legislative Campaign Committee the apparent sole contributor to the American Leadership Committee. The mailer is demonstrably false so it is no surprise they tried to cover their tracks.

The Democratic Legislative Campaign Committee is a national organization and the top donor to the House Democratic Campaign Committee. They then gave money to another national organization, the American Leadership Committee-Maine, that claims to not have any donors despite having already spent more than \$167,000 on Maine House races. This doesn't pass the straight face test.

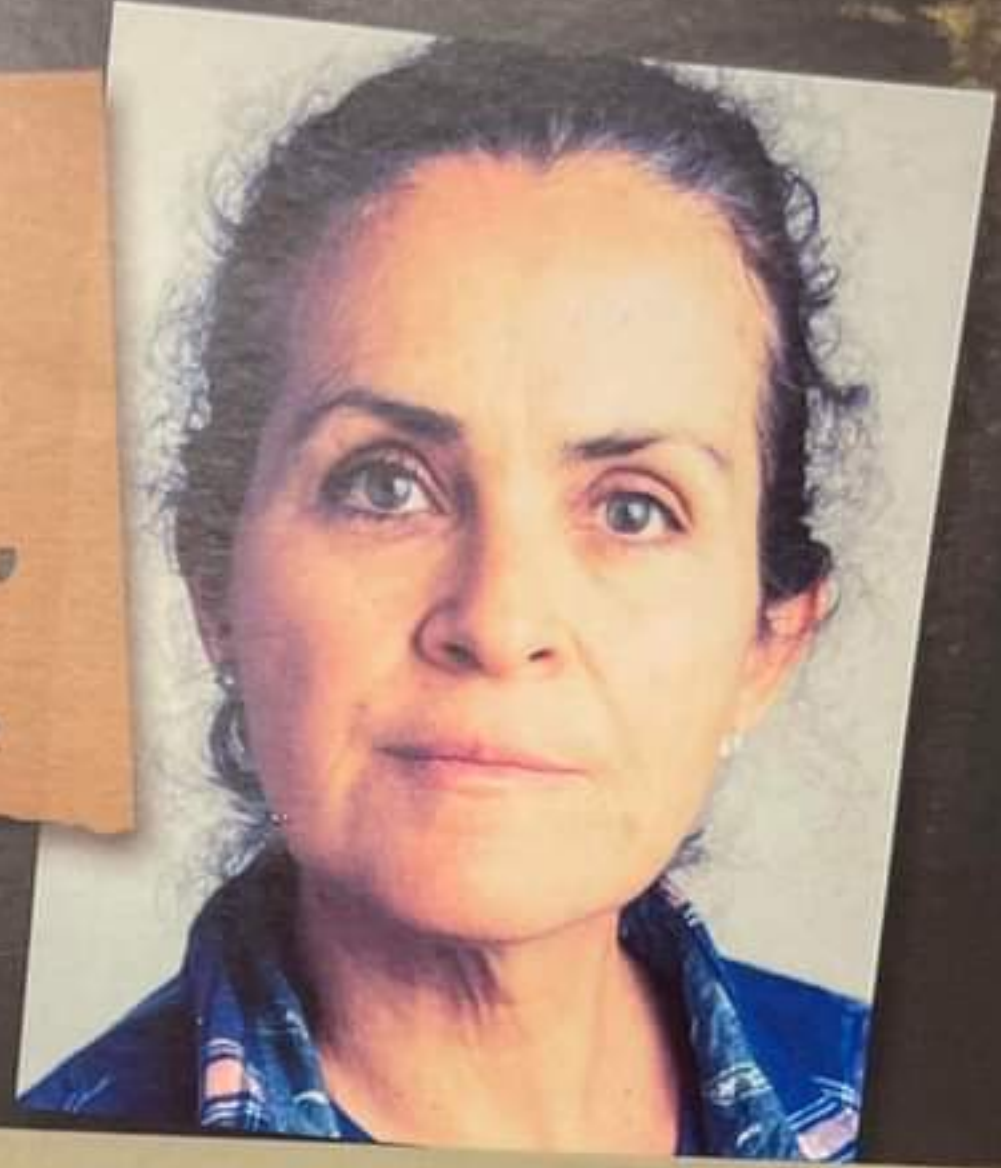
I understand that politics involve spin but this mailer contained outright lies about the candidate. There is nothing a candidate can do about false accusations but at least the law allows people to identify who made the false claim and vote accordingly. However this shell game used by the two entities thumbs its nose at the law.

I hope the Commission acts swiftly on this so that the people of Topsham know who was responsible for the payment of this egregious mailer.

Sincerely,
Mary

Mary Small
980 Washington St
Bath, Maine 04630
votemyway@yahoo.com
207-607-0536

**“Abortion rights in
Maine could be at risk
if Republicans reclaim
the state government”**

npr 5/16/22



**“MAINE REPUBLICAN
PARTY ADOPTS PLATFORM
AGAINST ABORTION”**

WABI/5 4/30/22

**“LePage has long
history of opposing
abortion rights”**

BEACON 6/29/22



**MAINE REPUBLICANS
WOULD TAKE AWAY
OUR RIGHTS**

WE CAN'T TRUST

REPUBLICAN LINDA BAKER



Now more than ever, we need a Representative who will defend our rights. But **Linda Baker** is backed by dangerous extremists who want to limit access to abortion, even here in Maine and could become the deciding vote to ban abortion in our state.¹

No matter how we feel about abortion personally, politicians should not be able to control people's private medical decisions.

Keep Linda Baker OUT of our State Legislature.

VOTE BY NOVEMBER 8



CHECK THE FACTS: Maine Republican Party Platform, accessed 9/20/22

Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No loop donors.

PSNRT STD US POSTAGE PAID STANDARD MODERN COMPANY AUTO**5-DIGIT 04086

PSNRT STD US POSTAGE PAID STANDARD MODERN COMPANY





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

October 19, 2022

By Email and Regular Mail

Jonathan S. Berkon, Esq.
Elias Law Group
10 G Street NE, Suite 600
Washington, DC 20002

Dear Mr. Berkon,

The Maine Ethics Commission received the enclosed complaint alleging that independent expenditure (IE) mailings by the American Leadership Committee - Maine PAC did not contain a disclosure statement identifying the PAC's top three funders. A sample mailing for Maine House district 51 was provided with the complaint, which includes the disclosure of "No top donors." Additionally, Commission staff observes that the IE report may not correctly state the expenditure date for the mailings, suggesting that the report may have been filed late. This letter seeks a written response from the PAC on both issues by 12:00 noon on Monday, October 24 and that you or a colleague participate by Zoom in the Commission's meeting on October 26.

The IE report indicates that the PAC made an expenditure to Moxie Media in Seattle, Washington for the mailings on October 12, 2022 with a remark of "debt owed." The complainant has confirmed that the sample mailing was received by Maine voters on October 14, 2022. It is a legitimate question whether an obligation or payment to Moxie Media on October 12 could result in the printing and delivery of the mailings to Maine voters by October 14. The Commission seeks clarification from the PAC when it made a promise or agreement to pay for the mailers, and whether payment has been made.

Consideration by the Commission

Because the complaint was filed within the last 28 days before the November 8, 2022 general election, the Commission is required to consider it within two business days unless the complainant and the responding party agree to a later date. 21-A M.R.S. § 1002(1). With Ms. Small's consent, the Commission staff has scheduled this matter for the Commission's next regular meeting on October 26, 2022.

Relevant Laws and Rule

Top 3 Funders Statement. An independent expenditure mailing must conspicuously include the following statement: "The top 3 funders of (name of entity that made the IE) are (names of top 3 funders). 21-A M.R.S. § 1014(2-B). Under the Commission's Rules interpreting this requirement, if an organization has established a PAC as a separate, segregated fund or fully funds or controls a PAC, an independent expenditure communication by the PAC must contain the top three funders of the organization that

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

PHONE: (207) 287-4179

FAX: (207) 287-6775
ETH:12

Jonathan S. Berkon, Esq.

Page 2

October 19, 2020

established, or funds or controls, the PAC. 94-270 C.M.R. ch. 1, §§ 7(12)(C)&(D). It appears that the PAC was established by the Democratic Legislative Campaign Committee, according to the PAC's registration.

Definition of Expenditure. The term "expenditure" includes "a purchase, payment, distribution, loan, advance, deposit or gift of money anything of value made for the purpose of initiating or influencing a campaign" and "a contract, promise, or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure for the purposes set forth in this paragraph. 21-A M.R.S. §§ 1052 (4)(A)(1)&(2). In other words, an expenditure includes not just a payment of money, but also a promise or agreement to pay for good or services to influence a candidate's election. Further guidance on reporting unpaid debts or obligations are set out in the Commission's rules. 94-270 C.M.R. ch. 1 § 7(3).

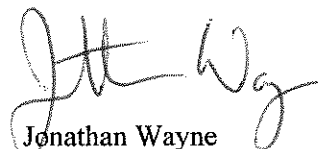
Request for Response

Please submit a written response no later than 12:00p.m. on Monday, October 24, 2022. You are welcome to include any information or legal argument you believe is relevant. The Commission staff recommends addressing the following specific points:

- If the PAC believes the "No top donor" statement complies with the top 3 funder requirement, please explain why. (The PAC has reported receiving a contribution from the Democratic Legislative Campaign Committee on September 20, 2022.)
- When did the PAC make a promise or agreement to Moxie Media to pay for the mailings? Please specify the action that constituted that commitment. In addition, if the PAC has paid Moxie Media for the mailings, please provide the payment date.

Thank you for your cooperation with this request. Please let me know if you have any questions.

Sincerely,



Jonathan Wayne
Executive Director

cc: Emily Hogin, Esq.
Mary Small

ETH:13



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

2022 INDEPENDENT EXPENDITURE REPORT

| COMMITTEE | | TREASURER |
|---|------------|--|
| American Leadership Committee - Maine 1225 I St NW Ste 1250 Washington, DC 20005 PHONE: (202) 449-6740 EMAIL: compliance@dlcc.org | | Meghan Lyons 1225 I St NW Ste 1250 Washington, DC 20005 PHONE:(202) 449-6740 EMAIL: lyons@dlcc.org |
| REPORT | DUE DATE | REPORTING PERIOD |
| 2-Day Pre-General IE Report | 10/14/2022 | 10/12/2022-10/12/2022 |

FINANCIAL ACTIVITY SUMMARY

| EXPENDITURES | |
|---|-------------|
| Total independent expenditures greater than \$250 per candidate | \$18,146.44 |
| Total independent expenditures of \$250 or less per candidate | \$0.00 |
| Total independent expenditures for all candidates | \$18,146.44 |

AFFIDAVIT

STATE OF _____

COUNTY OF _____

Heather Kashner, being duly sworn, attests that each of the expenditures listed in the attached report was made independently of, and not in cooperation, consultation, or concert with, or at the request or suggestion of, the candidate(s) named in the report, the political committee of the candidate(s), or their agents.

 (Signature of Affiant)

Sworn to before me this ____ day of _____ 2022

 (Notary Public/Attorney at Law)

Making a false statement under oath is punishable by law.

REPORT FILED BY: Heather Kashner
 REPORT FILED ON: 10/14/2022 1:57:06 PM
 LAST MODIFIED:
 COMMITTEE ID: 454265
 REPORT NUMBER: 35111

**SCHEDULE B-IE-1
CANDIDATE(S) SUPPORTED/OPOSED**

| Expenditure Date | Support / Oppose | Candidate Name | Office | District / County | Payee | Expenditure Amount |
|-------------------------|-------------------------|---------------------------|----------------|--------------------------|--------------|---------------------------|
| 10/12/2022 | OPPOSE | Jon Connor | Representative | 96 | Moxie Media | \$558.81 |
| 10/12/2022 | OPPOSE | Jon Connor | Representative | 96 | Moxie Media | \$1,304.00 |
| 10/12/2022 | OPPOSE | Mr. John Victor Chambers | Representative | 9 | Moxie Media | \$468.86 |
| 10/12/2022 | OPPOSE | Mr. John Victor Chambers | Representative | 9 | Moxie Media | \$1,085.00 |
| 10/12/2022 | OPPOSE | Mr. Mark Andrew Rouillard | Representative | 149 | Moxie Media | \$525.36 |
| 10/12/2022 | OPPOSE | Mr. Mark Andrew Rouillard | Representative | 149 | Moxie Media | \$1,222.00 |
| 10/12/2022 | OPPOSE | Mrs. Pamela Diane Buck | Representative | 142 | Moxie Media | \$506.83 |
| 10/12/2022 | OPPOSE | Mrs. Pamela Diane Buck | Representative | 142 | Moxie Media | \$1,177.00 |
| 10/12/2022 | OPPOSE | Ms. Linda L Baker | Representative | 51 | Moxie Media | \$621.19 |
| 10/12/2022 | OPPOSE | Ms. Linda L Baker | Representative | 51 | Moxie Media | \$1,458.00 |
| 10/12/2022 | OPPOSE | Ms. Tiffany Estabrook | Representative | 75 | Moxie Media | \$521.75 |
| 10/12/2022 | OPPOSE | Ms. Tiffany Estabrook | Representative | 75 | Moxie Media | \$1,213.00 |
| 10/12/2022 | OPPOSE | Mr. Charles J Bussell | Representative | 54 | Moxie Media | \$540.28 |
| 10/12/2022 | OPPOSE | Mr. Charles J Bussell | Representative | 54 | Moxie Media | \$1,258.00 |
| 10/12/2022 | OPPOSE | Mr. James E Orr | Representative | 59 | Moxie Media | \$527.62 |
| 10/12/2022 | OPPOSE | Mr. James E Orr | Representative | 59 | Moxie Media | \$1,228.00 |
| 10/12/2022 | OPPOSE | Mrs. AnnMarie Fredericks | Representative | 143 | Moxie Media | \$633.39 |

| | | | | | | |
|---|--------|--------------------------|----------------|-----|-------------|-------------|
| 10/12/2022 | OPPOSE | Mrs. AnnMarie Fredericks | Representative | 143 | Moxie Media | \$1,485.00 |
| 10/12/2022 | OPPOSE | Mr. James William Sorcek | Representative | 88 | Moxie Media | \$544.35 |
| 10/12/2022 | OPPOSE | Mr. James William Sorcek | Representative | 88 | Moxie Media | \$1,268.00 |
| Total itemized independent expenditures greater than \$250 per candidate | | | | | | \$18,146.44 |
| Total unitemized independent expenditures of \$250 or less per candidate | | | | | | \$0.00 |
| Total independent expenditures for all candidates | | | | | | \$18,146.44 |

**SCHEDULE B-IE-2
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 | Expenditure type | Net Amount |
| 10/12/2022 | Moxie Media PO BOX 30084 SEATTLE, WA, 98113 | Direct Mail postage | MHS | \$5,448.44 |
| 10/12/2022 | Moxie Media PO BOX 30084 SEATTLE, WA, 98113 | Direct Mail production (debt owed) | MHS | \$12,698.00 |
| Total Expenditure | | | | \$18,146.44 |



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

2022 REGISTRATION: POLITICAL ACTION COMMITTEE

| COMMITTEE INFORMATION | |
|---|---|
| American Leadership Committee - Maine 1225 I St NW Ste 1250 Washington, DC 20005 PAC TYPE: Regular | Phone: (202) 449-6740 Fax: Email: compliance@dlcc.org Web: |
| TREASURER INFORMATION | |
| Meghan Lyons 1225 I St NW Ste 1250 Washington, DC 20005 | Public: Fax: Email: lyons@dlcc.org |
| PRINCIPAL OFFICER INFORMATION | |
| Heather Kashner Principal Officer 1225 I St NW Ste 1250 Washington, DC 20005 | Public: (202) 449-6740 Email: compliance@dlcc.org |
| DECISION MAKERS AND FUNDRAISERS | |
| | |
| LEGISLATORS AND CANDIDATES WITH A SIGNIFICANT ROLE IN THIS PAC | |
| | |
| FORM OF ORGANIZATION | |
| Non-Profit | Date of origin / incorporation 07/09/2018 |
| FOUNDING ORGANIZATIONS | |
| American Leadership Committee 1225 I St NW Ste 1250 Washington, DC 20005 | Public: (202) 449-6740 |
| STATEMENT OF SUPPORT OR OPPOSITION | |
| SUPPORT | To support Democratic candidates for state legislature |
| CERTIFICATION | |
| I, Meghan Lyons, certify that the information in this registration is true, accurate, and complete. | |
| SIGNATURE | Date: October 03, 2022 |

Filed Date: 8/22/2022
 Amended Date: 10/3/2022

PAC Registration



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

2022 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

| COMMITTEE | | TREASURER | |
|--|------------|--|--|
| American Leadership Committee - Maine 1225 I St NW Ste 1250 Washington, DC 20005 PHONE:(202) 449-6740 EMAIL: compliance@dlcc.org | | Meghan Lyons 1225 I St NW Ste 1250 Washington, DC 20005 PHONE: EMAIL: lyons@dlcc.org | |
| REPORT | DUE DATE | REPORTING PERIOD | |
| Committee October Quarterly | 10/05/2022 | 08/23/2022 - 09/30/2022 | |

FINANCIAL ACTIVITY SUMMARY

| RECEIPTS | TOTAL FOR PERIOD | TOTAL FOR YEAR |
|--|------------------|----------------|
| 1. CASH CONTRIBUTIONS (SCHEDULE A) | \$56,400.00 | \$56,400.00 |
| 2. OTHER CASH RECEIPTS (INTEREST, ETC.) | \$0.00 | \$0.00 |
| 3. LOANS (SCHEDULE C) | \$0.00 | \$0.00 |
| 4. TOTAL RECEIPTS (LINE 1 + 2 + 3) | \$56,400.00 | \$56,400.00 |
| EXPENDITURES | | |
| 5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B) | \$0.00 | \$0.00 |
| 6. OPERATING EXPENDITURES (SCHEDULE B-1) | \$56,400.00 | \$56,400.00 |
| 7. LOAN REPAYMENTS (SCHEDULE C) | \$0.00 | \$0.00 |
| 8. TOTAL PAYMENTS (LINE 5 + 6 + 7) | \$56,400.00 | \$56,400.00 |
| CASH SUMMARY | | |
| 9. CASH BALANCE AT BEGINNING OF PERIOD | \$0.00 | |
| 10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4) | \$56,400.00 | |
| 11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8) | \$56,400.00 | |
| 12. CASH BALANCE AT END OF PERIOD | \$0.00 | |
| OTHER ACTIVITY | | |
| 13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1) | \$0.00 | \$0.00 |
| 14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C) | \$0.00 | |
| 15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D) | \$0.00 | |

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

REPORT FILED BY: Heather Kashner
 REPORT FILED ON: 10/5/2022 2:33:11 PM
 LAST MODIFIED:
 COMMITTEE ID: 454265

**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 |
|---------------------------------|--|-------------------------|------|--------------------|
| 9/20/2022 | Democratic Legislative Campaign Committee 1225 I St NW Suite 1250 Washington, DC, 20005 | | 5 | \$56,400.00 |
| TOTAL CASH CONTRIBUTIONS | | | | \$56,400.00 |

**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 |
| 9/20/2022 | GBAO Strategies 1701 K St NW Ste 600 Washington, DC, 20006 | Polling | POL | \$56,400.00 |
| TOTAL OPERATING EXPENDITURES | | | | \$56,400.00 |



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

To: Commission
From: Jonathan Wayne, Executive Director
Date: October 20, 2022
Re: Preliminary Staff Comments - American Leadership Committee-Maine PAC

The Commission received the attached complaint from Ms. Mary Small concerning mailings opposing legislative candidates financed by the American Leadership Committee-Maine PAC. It appears that the PAC was established by (or has another close relationship with) the Democratic Legislative Campaign Committee (DLCC), which is a national organization that promotes Democratic candidates for state office. This is suggested by the PAC's registration statement and the PAC's October quarterly campaign finance report, which disclosed a September 20, 2022 contribution of \$56,400 from the DLCC.

Top three funder disclosure. Ms. Small states that the mailings do not identify the top three funders of the American Leadership Committee-Maine PAC, which is required for most independent expenditure communications. The sample mailing she provided (opposing House candidate Linda Baker) contains the message: "No top donors." The cost of the Baker mailing was included in an independent expenditure report filed by the PAC on October 14, 2022 (attached), which included the costs of mailings to oppose a total of ten legislative candidates.

Because the Commission is required to consider the complaint on an expedited basis, we requested a written response from the PAC yesterday and have scheduled the matter for your October 26 meeting. We will do our best to provide additional staff comments or analysis in time for your consideration on October 26.

Date of expenditure, and timeliness of independent expenditure report. The staff has raised an additional compliance question (not in the complaint) relating to the timeliness of the

independent expenditure report. In the report, the PAC entered an “expenditure date” of Wednesday, October 12, 2022. The payee was Moxie Media in Seattle, Washington and the expenditure contained a notation of “debt owed.” The Commission staff learned that the PAC’s mailings were received by some Maine voters on Friday, October 14, 2022, which raised a question of whether the date of October 12 accurately describes the date on which the PAC entered into an agreement to pay for the mailings or actually paid for them. Because this issue is not in Ms. Small’s complaint, the Commission is not required by the Commission’s rules to address it at your October 26 issue. In yesterday’s letter requesting a response from the PAC, the staff asked for more information on this issue.

Thank you for your consideration of this agenda item.

October 24, 2022

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

RE: American Leadership Committee – Maine

Dear Commissioners:

We represent American Leadership Committee – Maine (“*ALC-ME*”). We write in response to a complaint filed regarding a mailer that ALC-ME reported with an expenditure date of October 12, 2022 (the “Mailer”). Complainants object that the Mailer’s disclaimer listed “No top donors,” and the Commission queries whether the October 12, 2022 date is the date that the expenditure was “made” under Maine law.¹

ALC-ME’s parent organization, American Leadership Committee – along with ALC-ME’s sole funder, the Democratic Legislative Campaign Committee – must comply with reporting and donor attribution requirements in jurisdictions across the country. These state laws differ and often conflict with one another. ALC-ME has made a good faith effort to comply with Maine’s complex (and relatively new) reporting and disclaimer rules and believes it has done so, for the reasons set forth below. Should the Commission use this proceeding to issue clarifying guidance on these laws, however, ALC-ME is prepared to correct any reports and/or communications to comply with this guidance.

I. Background on ALC-ME, American Leadership Committee, and the Democratic Legislative Campaign Committee

The American Leadership Committee (“*ALC*”) is a section 527 political organization incorporated in the District of Columbia. Unlike so-called “dark money” organizations, ALC discloses its donors (and expenditures) on publicly available reports filed with the Internal Revenue Service (“*IRS*”).² Simply put, there is no mystery about who funds ALC; the information is available to the public.

ALC makes independent expenditures. It is funded primarily by the Democratic Legislative Campaign Committee (“*DLCC*”), a section 527 political organization dedicated to electing state Democrats. ALC is separately incorporated from the DLCC, maintains its own bank accounts, and reports its own spending. Like ALC, the DLCC discloses its donors (and expenditures) on

¹ *Complaint against American Leadership Committee-Maine PAC*, (Oct. 17, 2022), <https://www.maine.gov/ethics/sites/maine.gov.ethics/files/inline-files/3%20-%20American%20Leadership%20Committee-Maine%20PAC.pdf>.

² *American Leadership Committee*, IRS: Political Organization Disclosures, <https://forms.irs.gov/app/pod/basicSearch/search?execution=e1s3&pacid=63162&format=> (last visited Oct. 21, 2022).

publicly available reports filed with the IRS.³ Again, there is no mystery about who funds the DLCC; the information is available to the public.

Where required by state law, ALC establishes state PACs through which it makes its independent expenditures. ALC-ME is ALC's state PAC in Maine through which it makes Maine independent expenditures.⁴

II. Top Donor Disclosure Under Maine Law

A. Legal Discussion

Maine law requires an independent expenditure communication of more than \$250 to include the following statement: "The top 3 funders of (name of entity that made the independent expenditure) are (names of top 3 funders)."⁵

As of 2019, the Maine Ethics Commission's regulations provide that "if the communication is funded by a political action committee *that is fully funded or controlled by another political action committee or legal entity*, the top three funders to be listed are the top three funders of that entity that fully funds or controls the political action committee."⁶ A Maine committee like ALC-ME that has only one funder is covered by this regulation because it is "fully funded ... by another ... legal entity." Per the regulation, such a fully-funded committee may *not* include the direct source of its funding in its "top funder" disclosure on independent expenditure communications. Instead, such a committee is required by law to assess the top three funders *to its funder*.

In making that assessment, an IE spender must follow Maine's laws for identifying top funders. When identifying the top three funders, Maine law instructs as follows:

- (1) "When compiling the list of top funders, an entity making an independent expenditure may disregard any funds that the entity can show were used for purposes unrelated to the candidate mentioned in the communication on the basis that funds were either spent in the order received or were strictly segregated in other accounts;"⁷ and
- (2) The top-funder disclosure statement "is not required to include the name of any funder who has provided less than \$1,000 to the entity making the independent expenditure since the day following the most recent general election day."⁸

ALC-ME understands the first requirement to be a "reasonable accounting method" rule, whereby an entity must use a consistent method to identify the sources of its funding. Maine law

³ *Id.*, Democratic Legislative Campaign Committee, IRS: Political Organization Disclosures, <https://forms.irs.gov/app/pod/basicSearch/search?execution=e1s5&pacid=4103&format=> (last visited Oct. 21, 2022).

⁴ *American Leadership Committee – Maine*, Committees: Maine Ethics Comm'n, <https://mainecampaignfinance.com/#/exploreCommitteeDetail/454265> (last visited Oct. 21, 2022).

⁵ Me. Rev. Stat. tit. 21-A, § 1014(2-B).

⁶ Code Me. R. tit. 94-270 Ch. 1, § 7(12)(D) (emphasis added).

⁷ Me. Rev. Stat. tit. 21-A, § 1014(2-B)(E).

⁸ *Id.* at § 1014(2-B)(C).

suggests some potential methods, but there may be others as well. Other states employ such rules too. Michigan law, for example, provides that “[i]temized fund transfers received by an affiliate PAC from a parent committee may be disclosed under the Campaign Finance Act through the ‘Last-In-First-Out’ (LIFO) accounting method or any other reasonable accounting method.”⁹ Likewise, federal law requires that a political committee “must demonstrate through a reasonable accounting method that, whenever such an organization makes a contribution or expenditure, or payment, the organization has received sufficient funds subject to the limitations and prohibitions of the Act to make such contribution, expenditure, or payment.”¹⁰

B. DLCC Methodology for Reporting Small Dollar Donors

The DLCC typically makes contributions and/or expenditures in more than twenty states each election cycle. Each state has different campaign finance laws. To comply with reporting rules across multiple jurisdictions, the DLCC has adopted a protocol for tracking which donors’ funds are used in each jurisdiction. Prior to, or within a reasonable time after, funds are spent in a state, the DLCC identifies the donors whose funds were used to make the applicable contribution or expenditure. Once marked as spent in a particular state, that donor’s contribution is no longer eligible to be spent in any other state.

Due to the change in Maine law in 2019, ALC-ME could not list DLCC as its top donor. Accordingly, DLCC changed its funding strategy in advance of the 2022 election and determined that it would only fund independent expenditure communications with funds from its Low Individual Account, a separate bank account into which only small-dollar contributions (up to \$4,999.99 per calendar year) from individuals are eligible to be deposited. Moreover, the DLCC determined that it would attribute its contributions to ALC-ME only to donors whose contributions since November 4, 2020 were less than \$1,000 in the aggregate, provided that sufficient funds of that type remained in the Low Individual Account at the time of each contribution.

On October 3, 2022, October 12, 2022, October 17, 2022, October 20, 2022, and October 21, 2022, DLCC made contributions to ALC-ME to support its Maine independent expenditure communications.¹¹ Those contributions consisted of funds entirely from donors who contributed less than \$1,000 to DLCC since the day following the last general election, using the DLCC’s accepted protocol for attributing donors to state-level contributions or expenditures. A list of these donors’ names, the amount and date of their contribution to DLCC, and their aggregate total contributions to DLCC since November 4, 2020 is attached as Exhibit A. These contributions were made to DLCC for the general support of DLCC’s mission to elect state Democrats and were not earmarked for Maine spending. None of these contributions had been previously identified or marked as funding a contribution or expenditure in another state; now that these contributions are being used to finance DLCC’s contributions to ALC-ME, they will

⁹ Mich. Bureau of Elections, *PAC Manual, Appendix K: Out of State Groups*, (Jan. 2, 2019), <https://mertsplus.com/mertsuserguide/index.php?n=MANUALS.AppendixK>

¹⁰ 11 CFR 102.5(b)(1).

¹¹ These contributions will be reported on ALC-ME’s pre-election report. A separate contribution from DLCC on September 20, 2022 was spent entirely on polling and not on the Mailer at issue in this complaint or any other independent expenditure communication. *See* American Leadership Committee – Maine, October Quarterly Report (Oct. 5, 2022).

not be identified or marked as funding a contribution or expenditure in another state in the future. Because ALC-ME is fully funded by the DLCC, the top three donors to be listed on its independent expenditures are those of the DLCC.¹² Maine law instructs that DLCC should exclude funds that they can show were used for purposes unrelated to the candidates mentioned in the communication. And because all contributions that are attributable to the Maine communications are from under-\$1,000 donors, ALC-ME was correct to include “no top donors” on the disclaimer.¹³

Given the complexity of their operations, ALC-ME and DLCC believes the “No top donors” statement under its reasonable accounting method represents a good faith effort to comply with the law. If the Commission disagrees, ALC-ME is willing to work with the Commission and Commission staff to modify the disclaimer on digital ads currently running and future mailers as provided under Me. Rev. Stat. tit. 21-A, § 1014(4).

III. The Earliest Date that ALC-ME Made an Expenditure for the Mailer Was October 12, 2022.

A. Maine Law Requires Disclosing an Independent Expenditure Made Between 60 and 14 Days Before An Election Within 48 Hours of When the Expenditure is Made

Maine requires committees making independent expenditures in excess of \$250 from the 60th day through the 14th day before an election to file a report “within two calendar days of the expenditure.”¹⁴ An “expenditure” is defined to include a “contract, promise or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure.”¹⁵ Maine’s Political Action Committee Guidebook says that an expenditure is “considered made at the earliest of the following events:

- the placement of an order for a good or service;
- the signing of a contract for a good or service;
- the delivery of a good or service;
- a promise or an agreement to pay; or
- the payment for a good or service.”¹⁶

B. ALC’s Independent Expenditure Process Generally

As an organization with a national mission to elect state Democrats, ALC’s independent expenditure program moves with speed and flexibility. For example, for a mail program, ALC will hire a mail vendor to develop mail concepts for multiple candidates and across multiples states, but not all of these concepts will make it to print. For those that do make it to print, ALC may take advantage of bulk printing discounts to print mailers for a group of candidates, but

¹² See Code Me. R. tit. 94-270 Ch. 1, § 7(12)(D).

¹³ Me. Rev. Stat. tit. 21-A, § 1014(2-B)(C).

¹⁴ Code Me. R. tit. 94-270 Ch. 1, § 10(3)(B)(2).

¹⁵ Me. Rev. Stat. tit. 21-A, § 1012(3).

¹⁶ Me. Ethics Comm’n, *Political Action Committee Guidebook* at 20 (December 2021), <https://www.maine.gov/ethics/sites/maine.gov.ethics/files/inline-files/PAC%20Guidebook.pdf>.

ultimately send mailers to just some of the candidates depending on the available budget for postage.

It is a common practice in the campaign industry at this time of year to cut program even after investment costs have been sunk for revenue reasons. In fact, ALC's revenue has come in under projections, leaving ALC to make difficult choices on a compressed timeline about what projects to keep funding.

ALC pays its printer 60 days in arrears and pre-pays for postage. That provides a 60-day cushion to cover sunk printing costs should a mailer not make it to the public after it has been printed.

C. Under Its Independent Expenditure Process, October 12 Was the Earliest Date the Expenditure Was Made

For the Mailer at issue in this complaint, ALC-ME reported the date that the first payment for the Mailer was made, an October 12, 2022 pre-payment for postage. That postage was invoiced originally on October 8, and the templates were sent to the printer on October 5; the Mailer was deposited with the United States Postal Service on October 13.

Because of the need to maintain flexibility in its program, ALC-ME did not commit to disseminating the Mailer until it paid the invoice on October 12, and that is the earliest date that the expenditure was finally made. There was no "promise to make an expenditure" when the templates were sent to the printer or invoiced, because the decision to make the expenditure for the purpose of influencing a state election—i.e., the decision to *disseminate* the Mailer to voters via the United States Postal Service—had not yet been made. A mailer that is printed *but never sent to voters* is not an "expenditure" under Maine law. ALC-ME's 48-hour report included the true costs of the postage that was pre-paid (\$5,448.44) as well as estimated costs for the production (\$12,698), which was reported as a debt owed and will be paid according to the 60-day schedule agreed to with that vendor.

Thus, ALC-ME timely filed its 48-hour report within two calendar days of making the expenditure at issue here.

We are happy to answer any questions during the Commission's October 26, 2022 hearing.

Yours truly,



Jonathan Berkon
Emily Hogin
Counsel to American Leadership Committee – Maine

EXHIBIT A

October 3, 2022 Transfer

| Donor Name | Date Received | Amount | Employer | Occupation | Home City | Home State/Province | Home Street Address | Home Zip/Postal |
|----------------------|---------------|--------|---|--------------------------|----------------|---------------------|------------------------------|-----------------|
| Matthews, Pam | 9/25/2022 | 6 | Kaiser Foundation Hospitals And Health Plan | Ethics and Compliance Rn | Molalla | OR | 44002 S Elk Prairie Rd | 97038 |
| Tannenwald, Robert | 9/25/2022 | 25 | Brandeis University | Economist | Swampscott | MA | 441 Essex St Unit 202 | 1907 |
| Blick, Clayton | 9/25/2022 | 50 | Not Employed | Not Employed | Litchfield | CT | 102 Naser Rd | 6759 |
| Jahan, Youngmin | 6/26/2022 | 50 | Not Employed | Not Employed | Philadelphia | PA | 1426 S 9th St | 19147 |
| Beauboeuf, Gladys | 9/25/2022 | 25 | Not Employed | Not Employed | Pembroke Pines | FL | 250 S Hollybrook Ter Apt 206 | 33025 |
| Collins, Judy | 6/26/2022 | 5 | Self-Employed | Entertainer | New York | NY | 845 W End Ave Apt 10E | 10025 |
| Collins, Judy | 9/25/2022 | 5 | Self-Employed | Entertainer | New York | NY | 845 W End Ave Apt 10E | 10025 |
| Romo, Ralph | 6/26/2022 | 10 | Not Employed | Not Employed | Lodi | CA | 101 Tree Ct | 95240 |
| Wallace, Susan | 6/26/2022 | 7 | Not Employed | Not Employed | Houston | TX | 13707 Apple Knoll Ct | 77059 |
| Hantman, Stuart | 6/26/2022 | 3 | Not Employed | Not Employed | Pittsford | NY | 28 Founders Grn | 14534 |
| Tacker, Sarah | 6/26/2022 | 10 | SAS | Programmer | Raleigh | NC | 4009 Huckleberry Dr | 27612 |
| Tacker, Sarah | 6/26/2022 | 7 | SAS | Programmer | Raleigh | NC | 4009 Huckleberry Dr | 27612 |
| Tacker, Sarah | 9/25/2022 | 10 | SAS | Programmer | Raleigh | NC | 4009 Huckleberry Dr | 27612 |
| Tacker, Sarah | 9/25/2022 | 4 | SAS | Programmer | Raleigh | NC | 4009 Huckleberry Dr | 27612 |
| Osborn, William | 9/25/2022 | 7 | Not Employed | Not Employed | Dunnellon | FL | 9925 SW 189th Cir | 34432 |
| Magrini, Brian | 6/26/2022 | 100 | INTEGRIS Health | Analyst | Oklahoma City | OK | 2825 Manchester Dr | 73120 |
| Taft, Bonnie | 6/26/2022 | 25 | UCSF | Nurse Practitioner | San Francisco | CA | 633 6th Ave | 94118 |
| Taft, Bonnie | 9/25/2022 | 25 | UCSF | Nurse Practitioner | San Francisco | CA | 633 6th Ave | 94118 |
| Olson, John | 6/26/2022 | 100 | Elekta | Sales | San Diego | CA | 702 Broadway Unit 3405 | 92101 |
| Olson, John | 9/25/2022 | 100 | Elekta | Sales | San Diego | CA | 702 Broadway Unit 3405 | 92101 |
| O'Malley, William | 6/26/2022 | 100 | Retired | Retired | Sahuarita | AZ | 251 W Calle Media Luz | 85629 |
| Murphy, Diane | 6/26/2022 | 100 | Syracuse University | Academic | Syracuse | NY | 123 Concord Pl | 13210 |
| Penzell, Gary | 9/25/2022 | 25 | Not Employed | Not Employed | Houston | TX | 5110 San Felipe St Unit 323W | 77056 |
| Berklich, Shari | 6/26/2022 | 10 | Not Employed | Not Employed | Oxford | MI | 75 W Burdick St | 48371 |
| Nakasono, Alan | 6/26/2022 | 10 | Hawaii DOE | Sub Teacher P and T | Honolulu | HI | PO Box 3262 | 96801 |
| Shaffer, Marsha | 6/26/2022 | 10 | Not Employed | Not Employed | Atlanta | GA | 3376 Peachtree Rd NE | 30326 |
| Shaffer, Marsha | 9/25/2022 | 10 | Not Employed | Not Employed | Atlanta | GA | 3376 Peachtree Rd NE | 30326 |
| Labarre, Jackie | 6/26/2022 | 10 | Self-Employed | Life Coach | Arlington | VA | 4868 28th St S | 22206 |
| Labarre, Jackie | 9/25/2022 | 10 | Self-Employed | Life Coach | Arlington | VA | 4868 28th St S | 22206 |
| England, Douglas | 6/26/2022 | 10 | Not Employed | Not Employed | Delray Beach | FL | 6124 La Palma Ln | 33484 |
| Ackerman, Kay | 6/26/2022 | 25 | Retired | Retired | Glenville | NY | 150 Dutch Meadows Ln Apt 334 | 12302 |
| Fair, Dale | 6/26/2022 | 100 | Not Employed | Not Employed | York | PA | 2169 Salisbury St | 17408 |
| Schelbly, Sherleen | 6/26/2022 | 5 | Not Employed | Not Employed | Champaign | IL | 1620 Congressional Way | 61822 |
| Johnson, Georgia | 6/26/2022 | 10 | Not Employed | Not Employed | Slidell | LA | 312 E Silver Maple Dr | 70458 |
| Johnson, Georgia | 9/25/2022 | 10 | Not Employed | Not Employed | Slidell | LA | 312 E Silver Maple Dr | 70458 |
| Lettre, Michel | 9/25/2022 | 25 | Not Employed | Not Employed | Owings Mills | MD | 3810 Thoroughbred Ln | 21117 |
| Zilber, Karen | 6/26/2022 | 15 | Not Employed | Not Employed | Kings Park | NY | 24 Indian Trce | 11754 |
| Zilber, Karen | 9/25/2022 | 15 | Not Employed | Not Employed | Kings Park | NY | 24 Indian Trce | 11754 |
| Williams, David | 9/25/2022 | 25 | Not Employed | Not Employed | Alhambra | CA | 2529 Montezuma Ave | 91803 |
| Johnson, Carol A. | 6/26/2022 | 10 | Not Employed | Not Employed | Blaine | MN | 732 Oak Ridge Trl NE | 55434 |
| Christian, Robbie | 6/26/2022 | 25 | Not Employed | Not Employed | Rio Rancho | NM | 880 Western Hills Dr SE | 87124 |
| Christian, Robbie | 6/26/2022 | 25 | Not Employed | Not Employed | Rio Rancho | NM | 880 Western Hills Dr SE | 87124 |
| Christian, Robbie | 9/25/2022 | 25 | Not Employed | Not Employed | Rio Rancho | NM | 880 Western Hills Dr SE | 87124 |
| Christian, Robbie | 9/25/2022 | 25 | Not Employed | Not Employed | Rio Rancho | NM | 880 Western Hills Dr SE | 87124 |
| Semp, Jim | 6/26/2022 | 10 | Self-Employed | Manager | Ithaca | NY | 302 King Rd E | 14850 |
| Lovett, Glenna | 6/26/2022 | 6 | Not Employed | Not Employed | Laguna Beach | CA | 396 Myrtle St | 92651 |
| Lovett, Glenna | 6/26/2022 | 5 | Not Employed | Not Employed | Laguna Beach | CA | 396 Myrtle St | 92651 |
| Lovett, Glenna | 9/25/2022 | 6 | Not Employed | Not Employed | Laguna Beach | CA | 396 Myrtle St | 92651 |
| Lovett, Glenna | 9/25/2022 | 5 | Not Employed | Not Employed | Laguna Beach | CA | 396 Myrtle St | 92651 |
| Cabot, Thomas | 6/26/2022 | 25 | Retired | Retired | Sun City | AZ | 9326 W Cedar Hill Cir N | 85351 |
| Vawter, Janet | 6/26/2022 | 25 | VHA | Registered Nurse | Lakeland | TN | 3773 Piper Bay Ln | 38002 |
| Vawter, Janet | 9/25/2022 | 25 | VHA | Registered Nurse | Lakeland | TN | 3773 Piper Bay Ln | 38002 |
| Bachenberg, Steven | 6/26/2022 | 25 | Not Employed | Not Employed | Lawrence | KS | 1216 N 1066 Rd | 66047 |
| Susskind, Andrew | 9/25/2022 | 25 | Drexel University | Professor | Narberth | PA | 309 Hampden Ave | 19072 |
| Church, Clyde | 6/26/2022 | 25 | Not Employed | Not Employed | Durango | CO | 400 Oakcrest Dr | 81301 |
| Church, Clyde | 6/26/2022 | 25 | Not Employed | Not Employed | Durango | CO | 400 Oakcrest Dr | 81301 |
| Carney, Bill | 6/26/2022 | 6 | Ashland University | Educator | Columbia | MO | 2600 Ridgefield Rd | 65203 |
| Grannis, Tekla | 6/26/2022 | 25 | Not Employed | Not Employed | Monrovia | CA | 435 N Canyon Blvd | 91016 |
| Sekar, Betsy | 6/26/2022 | 38 | Not Employed | Not Employed | Fort Wayne | IN | 4520 Old Mill Rd | 46807 |
| Holder, Terry | 6/26/2022 | 50 | Not Employed | Not Employed | Dixon | CA | 385 Anchor Ct | 95620 |
| Hopkins, Jane | 6/26/2022 | 25 | Not Employed | Not Employed | Saratoga | CA | 20650 Lomita Ave | 95070 |
| Torrest, Michael | 9/25/2022 | 5 | Not Employed | Not Employed | San Francisco | CA | 1840 Washington St | 94109 |
| Torrest, Michael | 9/25/2022 | 5 | Not Employed | Not Employed | San Francisco | CA | 1840 Washington St | 94109 |
| Kirkwood, Mary Anne | 9/25/2022 | 5 | Not Employed | Not Employed | San Francisco | CA | 1031 Greenwich St | 94133 |
| Zuckerman, Helen | 6/26/2022 | 7 | Not Employed | Not Employed | Union Pier | MI | 10361 Randall Rd | 49129 |
| Frazier, Elisabeth | 6/26/2022 | 5 | Woodycrest Center | Fiscal Officer | Poughkeepsie | NY | 111 Violet Ave | 12601 |
| Frazier, Elisabeth | 9/25/2022 | 5 | Woodycrest Center | Fiscal Officer | Poughkeepsie | NY | 111 Violet Ave | 12601 |
| Bruno, Sharon | 6/26/2022 | 5 | Towe of Greenwich BDE | Admin. Assistant | Suffield | CT | 129 Halladay Ave E | 6078 |
| Morales, Joseph | 6/26/2022 | 10 | Not Employed | Not Employed | Aibonito | PR | 52 Calle Laurel Blanco | 705 |
| Ronquillo, Annie | 6/26/2022 | 5 | Not Employed | Not Employed | Pueblo West | CO | 898 S Cellini Plz | 81007 |
| Ronquillo, Annie | 9/25/2022 | 5 | Not Employed | Not Employed | Pueblo West | CO | 898 S Cellini Plz | 81007 |
| Pritchard, Mary | 6/26/2022 | 25 | Not Employed | Not Employed | Jasper | GA | 251 Rebecca St | 30143 |
| McLaughlin, Margaret | 6/26/2022 | 10 | Not Employed | Not Employed | Philadelphia | PA | 8900 Norwood Ave | 19118 |
| Kirst, William | 6/26/2022 | 7 | Related | Sales | Miami | FL | 601 NE 36th St Apt 1003 | 33137 |
| Miller, Mary | 6/26/2022 | 25 | Not Employed | Not Employed | Platte City | MO | 13325 Running Horse Rd | 64079 |
| Hewitt, Deborah | 6/26/2022 | 25 | Self-Employed | Physician | Ruidoso Downs | NM | PO Box 2871 | 88346 |
| Nakashima, Jane | 6/26/2022 | 7 | Not Employed | Not Employed | Gig Harbor | WA | 2107 14th Ave NW | 98335 |
| Castens, Marcia | 9/25/2022 | 5 | Blue Coast Cardiology | Cardiovascular Tech | Carlsbad | CA | 2381 Jefferson St Apt A | 92008 |
| Crane, Scott | 6/26/2022 | 4 | Not Employed | Not Employed | Oxford | GA | 1189 Mount Zion Rd | 30054 |
| Oniell, Jane | 6/26/2022 | 7 | Not Employed | Not Employed | New York | NY | 435 E 86th St | 10028 |
| Minocha, Anil | 9/25/2022 | 10 | Banner Health | Physician | Phoenix | AZ | 5725 W Bajada Rd | 85083 |

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|--------------------------------|-----------|-----|---------------------------------|---------------------------|---------------------|----|----------------------------------|-------|
| Anderson, Nancy | 9/25/2022 | 25 | Not Employed | Not Employed | Los Angeles | CA | 2300 Westridge Rd | 90049 |
| Kratchman, Steve | 9/25/2022 | 100 | Not Employed | Not Employed | Ossining | NY | 29 Birch Ct | 10562 |
| Hays, Connie | 9/25/2022 | 25 | Not Employed | Not Employed | Hereford | AZ | 7914 S Broken Arrow Rd | 85615 |
| Bertapelle, Carol | 6/26/2022 | 10 | SkillsPay | Accounting | Spokane | WA | 239 W Main Ave Apt 6 | 99201 |
| Bertapelle, Carol | 6/26/2022 | 10 | SkillsPay | Accounting | Spokane | WA | 239 W Main Ave Apt 6 | 99201 |
| Bertapelle, Carol | 9/25/2022 | 25 | SkillsPay | Accounting | Spokane | WA | 239 W Main Ave Apt 6 | 99201 |
| Steiner, Lois | 6/26/2022 | 10 | Retired | Retired | Battle Ground | WA | 20216 NE 190th Ave | 98604 |
| Kramer, Ellen | 6/26/2022 | 5 | Not Employed | Not Employed | Green Bay | WI | 1820 Harold St | 54302 |
| Dwyer, Timothy | 6/26/2022 | 50 | Self-Employed | Family Therapist | Evanston | IL | 608 Hinman Ave Apt 45 | 60202 |
| Davies, Stevenson | 6/26/2022 | 50 | Not Employed | Not Employed | Merrimac | MA | 8 Greenleaf Dr Apt K | 1860 |
| Maves, Ryan | 6/26/2022 | 38 | Government | Physician | Winston Salem | NC | 2750 Old Town Club Rd | 27106 |
| Maves, Ryan | 9/25/2022 | 38 | Government | Physician | Winston Salem | NC | 2750 Old Town Club Rd | 27106 |
| Lytton, Lynn | 9/25/2022 | 25 | MAPS for Recovery | Physician | Austin | TX | 12308 Split Rail Pkwy | 78750 |
| Wollesen, Janice | 6/26/2022 | 10 | Not Employed | Not Employed | Minneapolis | MN | 7150 Cahill Rd Apt 301 | 55439 |
| Wollesen, Janice | 9/25/2022 | 10 | Not Employed | Not Employed | Minneapolis | MN | 7150 Cahill Rd Apt 301 | 55439 |
| Tenny, Nancy Robin | 6/26/2022 | 10 | Not Employed | Not Employed | Exeter | NH | 7 Riverwoods Dr Apt C115 | 3833 |
| Mstlack, Linda | 6/26/2022 | 25 | Not Employed | Not Employed | Wilton Manors | FL | 1517 NE 26th St | 33305 |
| Hergert-Knox, Kathe | 6/26/2022 | 7 | Not Employed | Not Employed | Lake Oswego | OR | 4340 Chapman Way | 97035 |
| Ferguson, Earl | 6/26/2022 | 7 | Ferguson Malone Architects | Architect | Irvington | NY | 14 S Ferris St | 10533 |
| Matthews, John | 6/26/2022 | 3 | The DC Bar | Facilities Asst | Washington | DC | 1737 Johnson Ave NW | 20009 |
| Henebry, Kath | 6/26/2022 | 7 | University of Nebraska at Omaha | Professor | Omaha | NE | 5912 N 108th Avenue Cir | 68164 |
| White Owl, Randy Sr | 6/26/2022 | 10 | TAT Gaming Commission | Surveillance Director | New Town | ND | PO Box 876 | 58763 |
| McAden, Patricia | 9/25/2022 | 7 | Not Employed | Not Employed | Springfield Gardens | NY | 12137 197th St | 11413 |
| Hartinger, James | 9/25/2022 | 25 | Kaiser Permanent | Director IT Support | Walnut Creek | CA | 1310 Alma Ave Apt 210 | 94596 |
| Scherer, Peter | 6/26/2022 | 25 | Not Employed | Not Employed | Mclean | VA | 7314 Hooking Rd | 22101 |
| Neira, Linda | 6/26/2022 | 10 | Not Employed | Not Employed | Somers | NY | 582 Heritage Hls Unit B | 10589 |
| Ridgeway, Donna | 6/26/2022 | 10 | Not Employed | Not Employed | Missoula | MT | 202 W Beckwith St W | 59801 |
| Matranga, Johnnie | 6/26/2022 | 10 | Not Employed | Not Employed | Sacramento | CA | 2026 Forrest St | 95815 |
| Duras, Connie | 9/25/2022 | 50 | Boulder Co | Animal Care | Firestone | CO | 104 Jackson Dr | 80520 |
| Thorson, John | 9/25/2022 | 25 | Boston Science | Data Analst | Mazepa | MN | 41997 585th St | 55956 |
| White, Mary Jolynne | 6/26/2022 | 25 | Wyzant | Tutor | Pineville | NC | PO Box 676 | 28134 |
| Lober, George | 6/26/2022 | 25 | Not Employed | Not Employed | Bear | DE | 419 Nilsen Rd | 19701 |
| Cathaway, Linda | 9/25/2022 | 20 | Not Employed | Not Employed | Oak View | CA | 235 Alto Dr | 93022 |
| Erickson, Pamela | 9/25/2022 | 20 | Not Employed | Not Employed | Milwaukee | WI | 2459 N 69th St | 53213 |
| McCabe, Charles | 6/26/2022 | 10 | Not Employed | Not Employed | Santa Fe | NM | 3101 Old Pecos Trl Unit 241 | 87505 |
| Nash, Stephanie | 6/26/2022 | 25 | Not Employed | Not Employed | Eagan | MN | 1829 Trailway Dr Apt 3 | 55122 |
| Cramer, Kathleen | 6/26/2022 | 25 | Not Employed | Not Employed | Highland | CA | 28670 Glenheather Dr | 92346 |
| Cramer, Kathleen | 6/26/2022 | 25 | Not Employed | Not Employed | Highland | CA | 28670 Glenheather Dr | 92346 |
| Spivey, Anthony | 6/26/2022 | 10 | King County | Corrections Officer | Covington | WA | 26009 189th Ave SE | 98042 |
| Paulen, Robert | 6/26/2022 | 10 | Not Employed | Not Employed | Dewey Beach | DE | 22 Read Ave | 19971 |
| Bowman, William J. | 9/25/2022 | 100 | Not Employed | Not Employed | Chadds Ford | PA | 1805 Masters Way | 19317 |
| Hart, Donald | 6/26/2022 | 25 | Not Employed | Not Employed | Herrndon | VA | 13400 Amy Way | 20171 |
| Williams, Alma | 9/25/2022 | 10 | Not Employed | Not Employed | Crest Hill | IL | 1360 Pioneer Rd Apt 101 | 60403 |
| Lance, Janice | 6/26/2022 | 10 | Not Employed | Not Employed | Las Vegas | NV | 8250 N Grand Canyon Dr Unit 2154 | 89166 |
| Weiner, Wynne | 6/26/2022 | 25 | Access Luxury Group LLC | Designer | Salisbury | CT | 4 Ravine Ridge Rd | 6068 |
| Delanty, Thomas | 6/26/2022 | 50 | Not Employed | Not Employed | Urbana | IL | 1901 A E Amber Ln | 61802 |
| Schor, Laurence | 6/26/2022 | 50 | Asmar Schor and McKenna | Attorney | Bethesda | MD | 7021 Mountain Gate Dr | 20817 |
| Gaskill, George | 6/26/2022 | 10 | Not Employed | Not Employed | Murfreesboro | TN | 5034 Saint Ives Dr | 37128 |
| Gaskill, George | 9/25/2022 | 5 | Not Employed | Not Employed | Murfreesboro | TN | 5034 Saint Ives Dr | 37128 |
| Triplett, Nancy | 6/26/2022 | 10 | Not Employed | Not Employed | Boulder | CO | 7378 Buckingham Ct | 80301 |
| Triplett, Nancy | 9/25/2022 | 10 | Not Employed | Not Employed | Boulder | CO | 7378 Buckingham Ct | 80301 |
| Bianco, Patricia | 9/25/2022 | 10 | Not Employed | Not Employed | Sunrise | FL | 11310 NW 31st St | 33323 |
| Bianco, Patricia | 9/25/2022 | 10 | Not Employed | Not Employed | Sunrise | FL | 11310 NW 31st St | 33323 |
| Ballentine, John | 6/26/2022 | 50 | Not Employed | Not Employed | San Francisco | CA | 109 Diamond Cove Ter | 94134 |
| Anderson, Stanton | 6/26/2022 | 25 | Munitech Inc. | Meter Technician | Howard Lake | MN | 8372 15th St SW | 55349 |
| Phurrough, Paula | 6/26/2022 | 38 | Not Employed | Not Employed | Columbia | MD | 8872 Shining Oceans Way | 21045 |
| Horan Sholl, Debra | 6/26/2022 | 25 | Not Employed | Not Employed | Davidsonville | MD | 1086 Galway Rd | 21035 |
| Horan Sholl, Debra | 6/26/2022 | 25 | Not Employed | Not Employed | Davidsonville | MD | 1086 Galway Rd | 21035 |
| Miller, Ron | 6/26/2022 | 50 | Not Employed | Not Employed | Nevis | MN | 19400 Edelweiss Dr Apt 103 | 56467 |
| Sue Shropshire, Linda | 6/26/2022 | 50 | Not Employed | Not Employed | Miller Place | NY | 8 Parkside Ave | 11764 |
| Adloff-Holschneider, Christine | 6/26/2022 | 50 | LAC-DHS | Physician | Los Angeles | CA | 931 Chantilly Rd | 90077 |
| Laskowski, Carol J. | 6/26/2022 | 50 | Not Employed | Not Employed | Libertyville | IL | 300 E Church St Unit 201 | 60048 |
| Corrie-McIntyre, Diane | 6/26/2022 | 3 | Self-Employed | Accountant and Bookkeeper | Palo Alto | CA | 357 Bryant Ct | 94301 |
| Bridges, Norma J. | 6/26/2022 | 7 | Not Employed | Not Employed | Herrndon | VA | 3224 Kinross Cir | 20171 |
| Coomes, Harlan | 9/25/2022 | 5 | Not Employed | Not Employed | Carmichael | CA | 6948 Grant Ave | 95608 |
| Jue, Elaine | 6/26/2022 | 7 | Not Employed | Not Employed | San Francisco | CA | 1683 38th Ave | 94122 |
| Hasselquist, Charlene | 9/25/2022 | 20 | Not Employed | Not Employed | Land O Lakes | FL | 3621 Gerrads Cross Ct | 34638 |
| Kodama, Nancy | 9/25/2022 | 10 | Not Employed | Not Employed | Walnut | CA | 21815 E Chestnut Ct # T | 91789 |
| Kodama, Nancy | 9/25/2022 | 7 | Not Employed | Not Employed | Walnut | CA | 21815 E Chestnut Ct # T | 91789 |
| Kodama, Nancy | 9/25/2022 | 7 | Not Employed | Not Employed | Walnut | CA | 21815 E Chestnut Ct # T | 91789 |
| Clough, Barb | 6/26/2022 | 25 | Not Employed | Not Employed | West Chesterfield | NH | 115 Hutchins Rd | 3466 |
| Burga, Rafael Martin | 6/26/2022 | 10 | Freelance | Video Editing | New York | NY | 870 Saint Nicholas Ave Apt F2 | 10032 |
| Burga, Rafael Martin | 6/26/2022 | 10 | Freelance | Video Editing | New York | NY | 870 Saint Nicholas Ave Apt F2 | 10032 |
| Burga, Rafael Martin | 6/26/2022 | 10 | Freelance | Video Editing | New York | NY | 870 Saint Nicholas Ave Apt F2 | 10032 |
| Burga, Rafael Martin | 9/25/2022 | 18 | Freelance | Video Editing | New York | NY | 870 Saint Nicholas Ave Apt F2 | 10032 |
| Biernacki, Lynne | 6/26/2022 | 6 | Not Employed | Not Employed | Grand Haven | MI | 14400 178th Ave | 49417 |
| Biernacki, Lynne | 9/25/2022 | 6 | Not Employed | Not Employed | Grand Haven | MI | 14400 178th Ave | 49417 |
| Demain, Pamela | 6/26/2022 | 5 | Not Employed | Not Employed | Madison | NJ | 43 Woodland Rd | 7940 |
| Christenson, Susan | 9/25/2022 | 10 | Not Employed | Not Employed | Portland | OR | 3174 SE Deswell St | 97267 |
| Draper, Steve | 6/26/2022 | 10 | Not Employed | Not Employed | Surprise | AZ | 16807 W Sabino Canyon Ln | 85387 |
| Ulbert, Thomas | 9/25/2022 | 5 | Not Employed | Not Employed | Grayslake | IL | 15 Cambridge Dr | 60030 |
| Schilling, John | 6/26/2022 | 10 | Not Employed | Not Employed | White Bear Lake | MN | 1275 Halper Pl | 55110 |
| Alter, Harvey | 6/26/2022 | 50 | NIH | Physician | Chevy Chase | MD | 4709 Cumberland Ave | 20815 |

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|------------------------|-----------|-----|--------------------------|--------------------------|--------------------|----|-----------------------------|-------|
| Obembe, Ireti | 6/26/2022 | 10 | Not Employed | Not Employed | Brooklyn | NY | 1411 Linden Blvd | 11212 |
| Obembe, Ireti | 9/25/2022 | 5 | Not Employed | Not Employed | Brooklyn | NY | 1411 Linden Blvd | 11212 |
| Meade, Kathie | 9/25/2022 | 5 | Not Employed | Not Employed | Leland | NC | 1017 Maplechase Dr SE | 28451 |
| Garrett, Bridget | 6/26/2022 | 10 | Not Employed | Not Employed | Makawao | HI | 3584 Kekolu Pl | 96768 |
| Schmidt, Louis | 6/26/2022 | 7 | Not Employed | Not Employed | Commack | NY | 31 Comanche Ln | 11725 |
| Gardiner, Margaret | 6/26/2022 | 25 | Self-Employed | Massage Therapist | Cornville | AZ | 270 S Merritt Ranch Rd | 86325 |
| Army, James | 9/25/2022 | 5 | Not Employed | Not Employed | Pacific | CA | 1540 Terra Nova Blvd | 94044 |
| McDonald, David | 9/25/2022 | 7 | Not Employed | Not Employed | Rehoboth Beach | DE | 35571 Dry Brook Dr | 19971 |
| Hodge, Janie | 6/26/2022 | 5 | Not Employed | Not Employed | Rome | GA | 63 Atkins Dr SE | 30161 |
| Miksche, Michael | 6/26/2022 | 25 | General Atomic | Contracts Manager | Huntsville | AL | 5 Leyland Dr SW | 35824 |
| McCormick, Shari | 6/26/2022 | 10 | Not Employed | Not Employed | Saint Louis | MO | 5933 Sherry Ave | 63136 |
| Ghent, Donald | 6/26/2022 | 10 | Gensler | Architect | Adelphi | MD | 2706 Falling Brook Ter | 20783 |
| Ghent, Donald | 9/25/2022 | 25 | Gensler | Architect | Adelphi | MD | 2706 Falling Brook Ter | 20783 |
| Rath, Carol | 6/26/2022 | 10 | Not Employed | Not Employed | Mankato | MN | 10 Bela Vista Ct | 56001 |
| Mathai, Stephen | 9/25/2022 | 25 | Retired | Retired | Centerville | OH | 1780 Valleybrook Pl | 45459 |
| Allison, Janet | 9/25/2022 | 10 | Not Employed | Not Employed | Garden Valley | CA | 4201 Windhaven Ln | 95633 |
| Schindler, Margaret | 6/26/2022 | 10 | Not Employed | Not Employed | Athens | GA | 115 Orchard Creek Dr | 30606 |
| Palekar, Sharad | 9/25/2022 | 25 | Not Employed | Not Employed | Apex | NC | 1201 Magnolia Row Trl | 27502 |
| Balas, Philip | 6/26/2022 | 10 | Self-Employed | Attorney | Palm Beach Gardens | FL | 8 Marlwood Ln | 33418 |
| Smyrl, Norman | 6/26/2022 | 7 | CNS | Development Chemist | Knoxville | TN | 11319 Berry Hill Dr | 37931 |
| Long, Richard | 6/26/2022 | 20 | Not Employed | Not Employed | Henderson | NV | 248 Jameson Cir | 89074 |
| Geller, Maureen | 6/26/2022 | 25 | Not Employed | Not Employed | Brooklyn | NY | 548 46th St | 11220 |
| Jackson, Gary | 6/26/2022 | 100 | Not Employed | Not Employed | Bella Vista | AR | 5 Dunsford Dr | 72715 |
| Holdredge, David | 6/26/2022 | 50 | Not Employed | Not Employed | Bryan | TX | 2845 Persimmon Ridge Ct | 77807 |
| Schafer, Sandra | 6/26/2022 | 10 | Not Employed | Not Employed | Pentwater | MI | 530 6th St | 49449 |
| Black, Susan | 6/26/2022 | 25 | Not Employed | Not Employed | Sequim | WA | 122 Jesslyn Ln | 98382 |
| Matthews, Eugene | 9/25/2022 | 25 | Not Employed | Not Employed | New Castle | DE | 77 Commonwealth Blvd | 19720 |
| Matthews, Eugene | 9/25/2022 | 25 | Not Employed | Not Employed | New Castle | DE | 77 Commonwealth Blvd | 19720 |
| Gelbert, Susan | 6/26/2022 | 25 | Not Employed | Not Employed | Richmond | VA | 1600 Westbrook Ave Apt 627 | 23227 |
| Dubose-Frasier, Annie | 6/26/2022 | 5 | Not Employed | Not Employed | New Haven | CT | 82 Diamond St | 6515 |
| Donica, Christine | 6/26/2022 | 10 | Not Employed | Not Employed | Canton | MI | 43121 Arlington Rd | 48187 |
| Donica, Christine | 9/25/2022 | 10 | Not Employed | Not Employed | Canton | MI | 43121 Arlington Rd | 48187 |
| Keller, Alan | 6/26/2022 | 75 | Not Employed | Not Employed | Canton | GA | 400 Eaglewood Way | 30115 |
| Helsell, Frank | 6/26/2022 | 25 | Not Employed | Not Employed | Gilbert | AZ | 6551 S Classic Way | 85298 |
| Langhorne, Webster L. | 6/26/2022 | 7 | Not Employed | Not Employed | College Park | GA | 4590 Jaillette Trce | 30349 |
| McKenna, Katherine | 6/26/2022 | 5 | Not Employed | Not Employed | Sayville | NY | 369 Wyandanch Rd | 11782 |
| McKenna, Katherine | 9/25/2022 | 5 | Not Employed | Not Employed | Sayville | NY | 369 Wyandanch Rd | 11782 |
| Levine, Ellen | 6/26/2022 | 25 | Not Employed | Not Employed | Great Neck | NY | 15 Canterbury Rd | 11021 |
| Roberts, Jeannie | 9/25/2022 | 18 | Self-Employed | Psychiatrist | Louisville | KY | 1621 Al Mara Cir | 40205 |
| Murphy, Robert | 9/25/2022 | 20 | Retired | Retired | Ashland | MO | 4891 Democracy Dr | 65010 |
| Murphy, Robert | 9/25/2022 | 7 | Retired | Retired | Ashland | MO | 4891 Democracy Dr | 65010 |
| Allensworth, Robert | 9/25/2022 | 10 | Self-Employed | Artist and Appraiser | New Rochelle | NY | 40 Park Pl | 10801 |
| Jubb, Margaret | 6/26/2022 | 7 | Not Employed | Not Employed | Bristol | CT | 264 Maple Ave | 6010 |
| Walsh, Michel | 6/26/2022 | 4 | Not Employed | Not Employed | Mansfield | MA | 68 Campbell St | 2048 |
| Mahoney, Leah | 6/26/2022 | 10 | Maine Medical | NP | North Yarmouth | ME | 321 New Gloucester Rd | 4097 |
| Wilson, Angelica | 6/26/2022 | 25 | Not Employed | Not Employed | Philadelphia | PA | 136 N Redfield St | 19139 |
| Mullins, C. Allen | 6/26/2022 | 10 | Self-Employed | Architect | Wilkes Barre | PA | 602 THISTLE Ln | 18701 |
| Perricelli, Kathleen | 6/26/2022 | 10 | Not Employed | Not Employed | Rochester | NY | 380 Susquehanna Rd | 14618 |
| Lemaire, Colleen | 6/26/2022 | 10 | Not Employed | Not Employed | Dallas | OR | 481 E Ellendale Ave | 97338 |
| Brown, Deette | 6/26/2022 | 10 | Not Employed | Not Employed | Haverford | PA | 9 Llanalew Rd | 19041 |
| Schmidt, Jill | 6/26/2022 | 10 | Edina | Realtor | Winona | MN | 77 Rivers Ln | 55987 |
| Ohara, Kieran | 6/26/2022 | 10 | Not Employed | Not Employed | Lexington | KY | 700 Mount Vernon Dr # L | 40502 |
| Hillyer, Gayle | 9/25/2022 | 23 | Not Employed | Not Employed | Rockford | IL | 1111 Esmond Dr | 61108 |
| Hayes, Gary | 6/26/2022 | 15 | Self-Employed | Consultant | North Myrtle Beach | SC | 6244 Catalina Dr Unit 1513 | 29582 |
| Kallor, Susan | 6/26/2022 | 25 | Not Employed | Not Employed | West Hartford | CT | 107 Lyman Rd | 6117 |
| Benford, Alan | 9/25/2022 | 103 | Mark Twain House | Historic Interpreter | Manchester | CT | 186 New State Rd Apt 40 | 6042 |
| Darbison, Marianne | 9/25/2022 | 7 | Not Employed | Not Employed | San Francisco | CA | 473 Leland Ave | 94134 |
| Kalick, Sheila | 6/26/2022 | 3 | Not Employed | Not Employed | New York | NY | 422 E 72nd St | 10021 |
| Rosenthal, Michele | 6/26/2022 | 25 | Not Employed | Not Employed | Manhasset | NY | 44 Bluebird Hill Ct | 11030 |
| Strong, Mindi | 6/26/2022 | 7 | Icon Health and Fitness | Administrative Assistant | Hyrum | UT | 276 W 20 N | 84319 |
| Foster, Brynda | 6/26/2022 | 7 | Not Employed | Not Employed | Novato | CA | 5 Fallen Leaf Way | 94949 |
| Straley, Mary Ann | 9/25/2022 | 25 | Not Employed | Not Employed | Cathedral City | CA | 27134 Shadowcrest Ln | 92234 |
| Perina, Frank | 6/26/2022 | 7 | Not Employed | Not Employed | Chester Springs | PA | 1908 Art School Rd | 19425 |
| Lehmkuhl, Margie | 6/26/2022 | 20 | Not Employed | Not Employed | Lake Tapawingo | MO | 187 Anchor Cir | 64015 |
| Quarles, Laurie | 9/25/2022 | 10 | Not Employed | Not Employed | Arlington | VA | 1017 N Potomac St | 22205 |
| Grindley, William | 6/26/2022 | 50 | Not Employed | Not Employed | Los Altos | CA | 46 S Gordon Way | 94022 |
| Dragan, Linda | 6/26/2022 | 25 | Not Employed | Not Employed | East Berlin | CT | PO Box 159 | 6023 |
| Nguyen, Thao | 6/26/2022 | 4 | Not Employed | Not Employed | Santa Clara | CA | 2901 Via Roma Pl | 95051 |
| Wagner, C.M. | 6/26/2022 | 25 | Not Employed | Not Employed | Bloomington | IN | 2260 S Olde Mill Dr | 47401 |
| Coutler, Linda | 6/26/2022 | 25 | Not Employed | Not Employed | Scarsdale | NY | 147 Webster Rd | 10583 |
| Heiler, Diane | 6/26/2022 | 2 | Not Employed | Not Employed | Buchanan | MI | 2951 White Oaks Rdg | 49107 |
| Dempsey, Suzanne | 6/26/2022 | 10 | Architect Of The Capitol | Your Guide | Lovettsville | VA | PO Box 241 | 20180 |
| Bullin, Mary Jo Jo | 9/25/2022 | 10 | Self-Employed | Figure Skating Coach | Julian | NC | 3440 Alamance Church Rd | 27283 |
| Bullin, Mary Jo Jo | 9/25/2022 | 10 | Self-Employed | Figure Skating Coach | Julian | NC | 3440 Alamance Church Rd | 27283 |
| Acerra, Mike | 6/26/2022 | 10 | Not Employed | Not Employed | Califon | NJ | 10 Summer Ln | 7830 |
| Male, Jonathan | 6/26/2022 | 50 | RRx | Marketing | Doylestown | PA | 7 Bedford Dr | 18902 |
| Ehinger, Julie | 6/26/2022 | 1 | Not Employed | Not Employed | Fort Wayne | IN | 7927 Oklahoma Trl | 46815 |
| Nelson-Neswig, Carleen | 6/26/2022 | 25 | Bee Tree Consulting Ltd. | President | Dexter | MI | 433 Bee Tree Ln | 48130 |
| Miers, James | 6/26/2022 | 25 | Not Employed | Not Employed | Avila Beach | CA | 6480 Cormorant Way Apt 2478 | 93424 |
| Blouin, John | 6/26/2022 | 50 | Not Employed | Not Employed | Orland Park | IL | 10801 Jillian Rd | 60467 |
| Beymer, Robert | 6/26/2022 | 25 | Not Employed | Not Employed | Ashburn | VA | 44735 Audubon Sq Apt 427 | 20147 |
| Beymer, Robert | 6/26/2022 | 6 | Not Employed | Not Employed | Ashburn | VA | 44735 Audubon Sq Apt 427 | 20147 |
| Beymer, Robert | 9/25/2022 | 25 | Not Employed | Not Employed | Ashburn | VA | 44735 Audubon Sq Apt 427 | 20147 |

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|-------------------------|-----------|------|-------------------------------------|----------------------------------|-------------------|----|---------------------------------|-------|
| Beymer, Robert | 9/25/2022 | 6 | Not Employed | Not Employed | Ashburn | VA | 44735 Audubon Sq Apt 427 | 20147 |
| Brown, Rick | 9/25/2022 | 25 | Self-Employed | Physician | Turner | ME | 273 Lower St | 4282 |
| Gruber, Judy | 6/26/2022 | 5 | Not Employed | Not Employed | Lexington | SC | 209 Camden Ct | 29072 |
| Schneider, Carol | 6/26/2022 | 25 | Retired | Retired | Hampton | VA | 11 Melissa Ct | 23669 |
| Weeks, K. Brant | 6/26/2022 | 50 | Retired | Retired | Benton | AR | 420 Lee Ann Ln | 72019 |
| Rashidi, Wendy | 6/26/2022 | 25 | Wwmg | Medical | Upland | CA | 1408 Forest St | 91784 |
| Quismondo, John | 9/25/2022 | 25 | Bd | Product Owner | National City | CA | 2408 J Ave | 91950 |
| Jones, Liz | 6/26/2022 | 25 | The Ziegler Companies LLC | Administrative Assistant | Ashburn | VA | 43148 Wintergrove Dr | 20147 |
| Shelton, Jennifer | 6/26/2022 | 10 | Not Employed | Not Employed | Detroit | MI | 5551 W Outer Dr | 48235 |
| Shelton, Jennifer | 6/26/2022 | 10 | Not Employed | Not Employed | Detroit | MI | 5551 W Outer Dr | 48235 |
| DeLong, Suzanne | 6/26/2022 | 25 | Not Employed | Not Employed | Batavia | IL | 968 Breton Ct | 60510 |
| Phillips, Kate | 9/25/2022 | 10 | Self-Employed | Massage Therapist | Parks | AZ | PO Box 50245 | 86018 |
| Kruger, Joy | 6/26/2022 | 10 | Not Employed | Not Employed | Old Greenwich | CT | 51 Forest Ave | 6870 |
| Georgiades, Austin | 6/26/2022 | 7 | Not Employed | Not Employed | Marlborough | CT | 5 Denler Dr | 6447 |
| Fortier, Elizabeth | 6/26/2022 | 7 | Polk Co School Board | Teacher | Plant City | FL | 4914 N Wilder Rd | 33565 |
| Robinson, Vivian | 6/26/2022 | 10 | Not Employed | Not Employed | San Antonio | TX | 3103 Crosby Cv | 78253 |
| Long, Keith | 9/25/2022 | 10 | Not Employed | Not Employed | Denver | CO | 9085 E Mississippi Ave Apt N107 | 80247 |
| Gross, Sylvia | 9/25/2022 | 3 | Not Employed | Not Employed | Boca Raton | FL | 3038 Lincoln B | 33434 |
| Shonert, Jeffrey H. | 9/25/2022 | 2.5 | Not Employed | Not Employed | New York | NY | 30 Park Ter E Apt 2A | 10034 |
| Vostal, Judith | 6/26/2022 | 10 | Not Employed | Not Employed | Tinley Park | IL | 7912 Trinity Cir Unit 25E | 60487 |
| Wingard, Steve | 9/25/2022 | 25 | Not Employed | Not Employed | Irwin | PA | 117 Tanglewood Ct | 15642 |
| Lundgren, Judy | 6/26/2022 | 25 | Not Employed | Not Employed | Fort Worth | TX | 1700 Sunset Ter Apt 18 | 76102 |
| Wischan-Rosen, Patricia | 9/25/2022 | 10 | Not Employed | Not Employed | New York | NY | 301 E 69th St # 16-E | 10021 |
| Vance, Jasmine | 6/26/2022 | 10 | Not Employed | Not Employed | Tucker | GA | 2037 Weems Rd Apt 9201 | 30084 |
| Giulini, Anthony | 6/26/2022 | 15 | Lu#164 Ibew | Union Electrician | Closter | NJ | 28 Haring St | 7624 |
| Lesser, Cynthia | 9/25/2022 | 10 | Not Employed | Not Employed | Washington | DC | 1100 6th St SW Apt 313 | 20024 |
| Lesser, Cynthia | 9/25/2022 | 10 | Not Employed | Not Employed | Washington | DC | 1100 6th St SW Apt 313 | 20024 |
| Flores, Judith | 6/26/2022 | 25 | Self-Employed | Physician | Brooklyn | NY | 257 Westminister Rd | 11218 |
| Adamiak, Kathryn | 6/26/2022 | 25 | Not Employed | Not Employed | Stuart | FL | 6988 SE Harbor Cir | 34996 |
| Knauf, Rhonda | 6/26/2022 | 25 | Self-Employed | Designer | South Glastonbury | CT | 651 Main St | 6073 |
| Knauf, Rhonda | 6/26/2022 | 25 | Self-Employed | Designer | South Glastonbury | CT | 651 Main St | 6073 |
| Allen, David | 6/26/2022 | 50 | Not Employed | Not Employed | Alachua | FL | 27030 NW County Road 239 | 32615 |
| Patten Tiffany, Patty | 6/26/2022 | 50 | Not Employed | Not Employed | Key West | FL | PO Box 5448 | 33045 |
| Parker, Tony | 9/25/2022 | 4 | Not Employed | Not Employed | Sacramento | CA | 4141 Palm Ave Apt 506 | 95842 |
| Price, Richard | 6/26/2022 | 10 | Not Employed | Not Employed | San Francisco | CA | 755 Duncan St | 94131 |
| Hannah, Hanna | 6/26/2022 | 7 | Not Employed | Not Employed | Santa Cruz | CA | 505 Swift St | 95060 |
| Yetter, Joyce | 6/26/2022 | 7 | Not Employed | Not Employed | Burnsville | MN | 330 E Burnsville Pkwy Apt 211 | 55337 |
| Ridge, Matthew | 6/26/2022 | 8 | Meadowbrook Insurance | Claims Processing Specialist | Marysville | OH | 738 Keystone Way | 43040 |
| Woffington, Helen | 6/26/2022 | 7 | Not Employed | Not Employed | Rancho Cucamonga | CA | 7720 Center Ave | 91730 |
| Cruser, Harlan | 6/26/2022 | 7 | Not Employed | Not Employed | Kelso | WA | 104 Ponderosa Dr | 98626 |
| Brooks, Emily | 9/25/2022 | 25 | Anaplan | Principal Software Test Engineer | San Leandro | CA | 479 Superior Ave | 94577 |
| Christie, Shana | 6/26/2022 | 25 | Geographic Expeditions | Adventure Travel | San Francisco | CA | 490 Eureka St | 94114 |
| Paetro, Anthony | 9/25/2022 | 5 | Not Employed | Not Employed | Clearwater | FL | 1559 Barry Rd | 33756 |
| Ritchie, Delene | 9/25/2022 | 50 | Not Employed | Not Employed | Bothell | WA | 17516 Clover Rd | 98012 |
| Mansfield, Seymour | 6/26/2022 | 12.5 | Self-Employed | Attorney | Minneapolis | MN | 2837 Sunset Blvd | 55416 |
| McDonald, Henry | 6/26/2022 | 15 | Not Employed | Not Employed | Lachine | MI | 12223 Hibner Rd | 49753 |
| Fisher, Stephen | 6/26/2022 | 10 | Not Employed | Not Employed | Berkeley | CA | 55 San Mateo Rd | 94707 |
| Wood, James | 9/25/2022 | 38 | Bureau Veritas | Administrator | Raleigh | NC | 2000 University Woods Rd | 27603 |
| Chavez, Rosanna | 9/25/2022 | 10 | Self-Employed | Therapist | New York | NY | 64 W 84th St Apt 18 | 10024 |
| Leland, Valarie | 6/26/2022 | 100 | Thomson Reuters | Analyst | Carrollton | TX | 2827 N Surrey Dr | 75006 |
| Hagen, Bradley | 6/26/2022 | 25 | Providence | Nurse Practitioner | Ashland | OR | 289 Liberty St | 97520 |
| Abella, Armeen | 6/26/2022 | 12 | Not Employed | Not Employed | La Crescenta | CA | 5010 Zoe Anne Way | 91214 |
| Yankie, Karen | 6/26/2022 | 25 | Not Employed | Not Employed | Albion | MI | 104 Irwin Ave | 49224 |
| Davis, Christine | 9/25/2022 | 12 | Not Employed | Not Employed | Brighton | MI | 7783 Brighton Rd | 48116 |
| Dehn, Janice | 9/25/2022 | 50 | Zifg Davis | Ecew Producer | Bradley Beach | NJ | 611 Brinley Ave | 7720 |
| Patterson, Kay | 6/26/2022 | 7 | Not Employed | Not Employed | Goshen | IN | 1504 Kingston Ct | 46528 |
| Keithley, Robin | 6/26/2022 | 10 | Not Employed | Not Employed | Omaha | NE | 13712 Hickory Cir | 68144 |
| Keithley, Robin | 6/26/2022 | 10 | Not Employed | Not Employed | Omaha | NE | 13712 Hickory Cir | 68144 |
| Cunningham, Judy | 6/26/2022 | 50 | Not Employed | Not Employed | Placerville | CA | 3188 Highgrade St | 95667 |
| Cunningham, Judy | 6/26/2022 | 50 | Not Employed | Not Employed | Placerville | CA | 3188 Highgrade St | 95667 |
| Strang, Arthur | 6/26/2022 | 10 | Not Employed | Not Employed | Cambridge | MA | 60 Fresh Pond Pkwy | 2138 |
| Strang, Arthur | 9/25/2022 | 10 | Not Employed | Not Employed | Cambridge | MA | 60 Fresh Pond Pkwy | 2138 |
| Myers, Paul | 6/26/2022 | 50 | Not Employed | Not Employed | Great Falls | VA | 12004 Holly Crest Ct | 22066 |
| Ciancy, Mary | 9/25/2022 | 5 | St John's Health Center | Registered Nurse | Santa Monica | CA | 1802 18th St Apt A | 90404 |
| McKee, Robbie | 6/26/2022 | 10 | Wichita State University | Professor | Lake Ozark | MO | 220 Osage Hills Rd | 65049 |
| Marszalek, Marcia | 6/26/2022 | 25 | Not Employed | Not Employed | Tacoma | WA | 6119 Madrona Dr NE | 98422 |
| Katz, Lawrence | 6/26/2022 | 25 | Not Employed | Not Employed | Ocean | NJ | 14 Oak Tree Ln | 7712 |
| Conlan, Clara | 6/26/2022 | 25 | Not Employed | Not Employed | Grayland | WA | PO Box 602 | 98547 |
| Clark-Elliott, Carol | 6/26/2022 | 25 | Not Employed | Not Employed | West Lafayette | IN | 2508 W 600 N | 47906 |
| Kirkland, Frank M. | 9/25/2022 | 100 | CUNY--Hunter College | Professor | Briarwood | NY | 8020 138th St Apt 2A | 11435 |
| Heaberg, Gall | 6/26/2022 | 20 | Not Employed | Not Employed | Bonaire | GA | 102 Brittlind Dr | 31005 |
| Neal, Marvin | 9/25/2022 | 125 | Not Employed | Not Employed | Wauconda | IL | 1224 Baldwin Ln | 60084 |
| Butler, Michael | 6/26/2022 | 25 | Self-Employed | It Consultant | Stellacoom | WA | 702 2nd St | 98388 |
| Butler, Michael | 9/25/2022 | 25 | Self-Employed | It Consultant | Stellacoom | WA | 702 2nd St | 98388 |
| Nevins, Vicki | 6/26/2022 | 10 | Self-Employed | Psychologist | Solana Beach | CA | 325 S Sierra Ave | 92075 |
| Ramsey, Bernice | 6/26/2022 | 3 | Not Employed | Not Employed | Chelsea | MI | 524 W Middle St | 48118 |
| Ramsey, Bernice | 9/25/2022 | 3 | Not Employed | Not Employed | Chelsea | MI | 524 W Middle St | 48118 |
| Severin, Linda | 6/26/2022 | 25 | Whistleblower Law Collaborative LLC | Attorney | Newton Highlands | MA | PO Box 610196 | 2461 |
| Severin, Linda | 6/26/2022 | 25 | Whistleblower Law Collaborative LLC | Attorney | Newton Highlands | MA | PO Box 610196 | 2461 |
| Severin, Linda | 9/25/2022 | 25 | Whistleblower Law Collaborative LLC | Attorney | Newton Highlands | MA | PO Box 610196 | 2461 |
| Severin, Linda | 9/25/2022 | 25 | Whistleblower Law Collaborative LLC | Attorney | Newton Highlands | MA | PO Box 610196 | 2461 |
| Mercier, Richard | 6/26/2022 | 25 | Not Employed | Not Employed | Leesburg | VA | 5 Stationmaster St SE Apt 302 | 20175 |
| Mercier, Richard | 6/26/2022 | 25 | Not Employed | Not Employed | Leesburg | VA | 5 Stationmaster St SE Apt 302 | 20175 |

| | | | | | | | | |
|----------------------|-----------|-----|---|-------------------------------|------------------|----|-----------------------------------|-------|
| McDaniel, Jayna | 6/26/2022 | 25 | Delaware City Schools | Board of Education Member | Delaware | OH | 189 Hawthorn Blvd | 43015 |
| Barnes, Dennis | 6/26/2022 | 100 | Not Employed | Not Employed | Chicago | IL | 9157 S Blackstone Ave | 60619 |
| Hudson, Lisa | 6/26/2022 | 10 | Not Employed | Not Employed | Snellville | GA | 1722 Pharrs Rd | 30078 |
| Rowlett, John | 6/26/2022 | 75 | Field Guides Incorporated | Bird Tour Guide; Editor | Charlottesville | VA | 1270 River Chase Ln | 22901 |
| York, Marvin | 9/25/2022 | 25 | Self-Employed | Truck Driver | Portland | OR | 10350 N Vancouver Way # 100 | 97217 |
| Bradford, James | 6/26/2022 | 50 | Not Employed | Not Employed | Royal Oak | MI | 127 Maxwell Ave | 48067 |
| Maloney, Barbara | 6/26/2022 | 50 | Not Employed | Not Employed | La Mesa | CA | 3910 Denver Dr | 91941 |
| Rawls, Richard | 6/26/2022 | 10 | Not Employed | Not Employed | Viroqua | WI | E2932 Newton Rd | 54665 |
| Flete, Robert | 9/25/2022 | 25 | Not Employed | Not Employed | Wadsworth | OH | 697 Silvercrest Dr | 44281 |
| Gildin, Marsha | 6/26/2022 | 100 | Girl Be Heard | Teaching Artist | New York | NY | 66 Overlook Ter Apt 5N | 10040 |
| Dunfrund, Sharon | 9/25/2022 | 25 | Not Employed | Not Employed | Alexandria | VA | 6481 Unleigh Way | 22315 |
| Lyne, David | 6/26/2022 | 10 | Not Employed | Not Employed | Stanwood | WA | 825 300th St NE | 98292 |
| Smith, Susan | 6/26/2022 | 25 | Not Employed | Not Employed | Denver | CO | 5886 Alton St | 80238 |
| Bains, Yashpal | 6/26/2022 | 100 | Altran Bordentowntown NJ | Engineer | Bensalem | PA | 1036 Essex Dr | 19020 |
| Campbell, Barbara | 9/25/2022 | 5 | Not Employed | Not Employed | Aurora | CO | 1923 Biscay St | 80011 |
| Towne, Courtney | 6/26/2022 | 25 | Triple P America | Implementation Consultant | Vancouver | WA | 10015 NW 17th Ave | 98685 |
| Quattrone, Louise | 6/26/2022 | 12 | Not Employed | Not Employed | Philadelphia | PA | 1901 John F Kennedy Blvd Apt 1801 | 19103 |
| Mangravitte, Theresa | 6/26/2022 | 25 | Not Employed | Not Employed | Morris Plains | NJ | 35 Janeway Pl | 7950 |
| Wainscott, James | 6/26/2022 | 10 | Not Employed | Not Employed | Placerville | CA | 3439 Fort Jim Rd | 95667 |
| Shea, Joanne | 6/26/2022 | 10 | Not Employed | Not Employed | Linwood | PA | 1419 Brookside Ave | 19061 |
| Durkee, David | 6/26/2022 | 10 | USPS | Deliver Driver | Wells River | VT | 74 Main St N | 5081 |
| Dole, Donna | 6/26/2022 | 12 | Not Employed | Not Employed | Caldwell | ID | PO Box 901 | 83606 |
| Bensusen, K. | 9/25/2022 | 10 | Not Employed | Not Employed | El Prado | NM | 11 Reyna Rd | 87529 |
| Cardinale, Daniel | 9/25/2022 | 10 | Umassmedical Center | Registered Nurse | Shrewsbury | MA | 1 Gates Rd | 1545 |
| Durst, Daniel O. | 6/26/2022 | 4 | Retired | Retired | Farmington Hills | MI | 30070 W 12 Mile Rd Unit 121 | 48334 |
| Durst, Daniel O. | 6/26/2022 | 4 | Retired | Retired | Farmington Hills | MI | 30070 W 12 Mile Rd Unit 121 | 48334 |
| Fahey, Joyce | 6/26/2022 | 10 | Retired | Retired | Moorestville | NC | 136 Claire Ln Apt 103 | 28117 |
| Knight, Frank | 6/26/2022 | 7 | Not Employed | Not Employed | Pleasantville | NY | 72 Columbus Ave | 10570 |
| Richard, Huey | 9/25/2022 | 10 | Not Employed | Not Employed | Thibodaux | LA | 282 Crossing North St | 70301 |
| Haglund, Sherron | 9/25/2022 | 10 | Not Employed | Not Employed | San Antonio | TX | 5704 Gomer Pyle | 78240 |
| Wilkins, James | 9/25/2022 | 2 | Not Employed | Not Employed | Converse | TX | 9815 Meadow Way | 78109 |
| Shay, Kathryn | 6/26/2022 | 10 | Not Employed | Not Employed | Vancouver | WA | 10306 NE 88th St | 98662 |
| Shay, Kathryn | 6/26/2022 | 5 | Not Employed | Not Employed | Vancouver | WA | 10306 NE 88th St | 98662 |
| Swanson, Marleen | 6/26/2022 | 5 | Not Employed | Not Employed | Denver | CO | 5062 Perth St | 80249 |
| Fedyna, Francesca | 6/26/2022 | 7 | Not Employed | Not Employed | Flemington | NJ | 33 Sullivan Rd | 8822 |
| Demby, Stephen | 9/25/2022 | 5 | Pequothealthcare | IT | Norwich | CT | 182 Sheraton Ln | 6360 |
| Brett-Smith, Helena | 6/26/2022 | 10 | Trevi Therapeutics | Research Physician | New Haven | CT | 8 Reservoir St | 6511 |
| Ritger, Mary Beth | 9/25/2022 | 2.5 | Self-Employed | Attorney | New York | NY | 61 W 62nd St Apt 20L | 10023 |
| Bennett, Sarah | 6/26/2022 | 10 | Not Employed | Not Employed | Crestone | CO | PO Box 607 | 81131 |
| Maloney, Elizabeth | 6/26/2022 | 10 | Not Employed | Not Employed | Des Plaines | IL | 1365 Ashland Ave | 60016 |
| Pauly, Marcia | 9/25/2022 | 5 | Not Employed | Not Employed | Stone Mountain | GA | 4035 Flintridge Dr | 30083 |
| Pauly, Marcia | 9/25/2022 | 4 | Not Employed | Not Employed | Stone Mountain | GA | 4035 Flintridge Dr | 30083 |
| Alcorn, James | 9/25/2022 | 25 | Self-Employed | Architect | La Jolla | CA | 9736 Claiborne Sq | 92037 |
| Biernere, Rebecca | 6/26/2022 | 25 | Not Employed | Not Employed | Ballwin | MO | 301 Clovis Dr | 63011 |
| Smith, Steve | 6/26/2022 | 7 | Self-Employed | Teacher | Shoreline | WA | 29252 WALLINGFORD Ave N | 98133 |
| Haynes, Patrick | 9/25/2022 | 7 | Not Employed | Not Employed | Dallas | TX | 4041 Mendenhall Dr | 75244 |
| Hernandez, Gilbert | 6/26/2022 | 5 | Not Employed | Not Employed | San Antonio | TX | 6427 Wurzbach Rd Apt 13 | 78240 |
| Ross, Loren | 6/26/2022 | 25 | Not Employed | Not Employed | New York | NY | 333 E 30th St Apt 20M | 10016 |
| Ames, Lynn | 9/25/2022 | 4 | Not Employed | Not Employed | Milwaukee | WI | 1220 S 52nd St | 53214 |
| Crawl, Bettie | 9/25/2022 | 4 | Not Employed | Not Employed | Bowie | MD | 4905 Forest Creek Ct | 20720 |
| McHale, Jt | 9/25/2022 | 7 | Not Employed | Not Employed | Melbourne | FL | 2260 Front St Apt 103 | 32901 |
| Harris, Karen | 6/26/2022 | 25 | Swedish Medical Center -Seattle | Registered Nurse | Mukilteo | WA | 12924 50th Pl W | 98275 |
| Harris, Karen | 9/25/2022 | 25 | Swedish Medical Center -Seattle | Registered Nurse | Mukilteo | WA | 12924 50th Pl W | 98275 |
| Horak, Robert | 6/26/2022 | 10 | Self-Employed | Attorney | Johnston | IA | 6042 Sheffield Cir | 50131 |
| Horak, Robert | 6/26/2022 | 10 | Self-Employed | Attorney | Johnston | IA | 6042 Sheffield Cir | 50131 |
| Levy, Lorell | 6/26/2022 | 10 | West Windsor-Plainsboro School District | Educator | Trenton | NJ | 5 Belmont Cir | 8618 |
| Gillens, Lucy | 6/26/2022 | 10 | Not Employed | Not Employed | Chesapeake | VA | 208 Dunwich Rd # B | 23325 |
| Thompson, Paul | 9/25/2022 | 7 | CDE | Education Programs Consultant | Sacramento | CA | 6761 Freehaven Dr | 95831 |
| Thompson, Paul | 9/25/2022 | 7 | CDE | Education Programs Consultant | Sacramento | CA | 6761 Freehaven Dr | 95831 |
| Acord, Danell | 6/26/2022 | 10 | Not Employed | Not Employed | Roseburg | OR | 982 Doerner Rd | 97471 |
| Murphy, Mark | 6/26/2022 | 10 | USG | Analyst | Jamestown | NC | 306 Jordan Ridge Way | 27282 |
| Murphy, Mark | 9/25/2022 | 10 | USG | Analyst | Jamestown | NC | 306 Jordan Ridge Way | 27282 |
| Guenther, Marilyn | 6/26/2022 | 10 | Not Employed | Not Employed | Rochester | NY | 406 Upper Valley Rd | 14624 |
| Guenther, Marilyn | 9/25/2022 | 10 | Not Employed | Not Employed | Rochester | NY | 406 Upper Valley Rd | 14624 |
| Wilson, Martha | 9/25/2022 | 25 | NASW | Comms | Washington | DC | 1916 17th St NW Apt 305 | 20009 |
| Okimoto, Jennifer | 6/26/2022 | 10 | Hawaii | Desktop Specialist | Hilo | HI | 708 Kaulele Pl | 96720 |
| Zeman, Frank | 9/25/2022 | 10 | Not Employed | Not Employed | Naples | FL | 364 Tern Dr Apt 3 | 34112 |
| Walker, Martha | 6/26/2022 | 10 | Personal Care | Cna | Mcdonough | GA | 100 Ashley Oaks Dr | 30253 |
| Walker, Martha | 9/25/2022 | 10 | Personal Care | Cna | Mcdonough | GA | 100 Ashley Oaks Dr | 30253 |
| Gray, Sandra | 6/26/2022 | 7 | Self-Employed | Property Manager | Debarry | FL | 263 Bayou Cir | 32713 |
| Bodnar, Michael | 6/26/2022 | 10 | Portauthorityof Allegheny County | Building Maintainer | Carnegie | PA | 348 Reamer Ave | 15106 |
| Petersen, Lynn | 6/26/2022 | 50 | Not Employed | Not Employed | Tustin | CA | 2252 Caper Tree Dr | 92780 |
| Ostranderrand, Karin | 6/26/2022 | 25 | Self-Employed | Therapist | Burlington | MA | 31 Sandy Brook Rd | 1803 |
| Harmon, Ellen | 6/26/2022 | 7 | Not Employed | Not Employed | Oklahoma City | OK | 1209 NW 36th St | 73118 |
| Gregory, Janey | 6/26/2022 | 2 | Not Employed | Not Employed | Sparta | TN | 172 Petty Rd | 38583 |
| Wilkins, Margaret | 6/26/2022 | 2.5 | Self-Employed | Tutor | Seattle | WA | 2687 SW Sylvan Heights Dr | 98106 |
| Wilkins, Margaret | 9/25/2022 | 2.5 | Self-Employed | Tutor | Seattle | WA | 2687 SW Sylvan Heights Dr | 98106 |
| Dillard, Christi | 6/26/2022 | 5 | Not Employed | Not Employed | Fort Davis | TX | 101 N Front St | 79734 |
| Dillard, Christi | 6/26/2022 | 5 | Not Employed | Not Employed | Fort Davis | TX | 101 N Front St | 79734 |
| Dillard, Christi | 9/25/2022 | 5 | Not Employed | Not Employed | Fort Davis | TX | 101 N Front St | 79734 |
| Dillard, Christi | 9/25/2022 | 5 | Not Employed | Not Employed | Fort Davis | TX | 101 N Front St | 79734 |
| Whitis, Jondalyn | 6/26/2022 | 7 | Self-Employed | Trainer | Brooklyn | NY | 341 10th St | 11215 |
| Garcia, Ruth K. | 9/25/2022 | 5 | Retired | Retired | Kent | WA | 25805 34th Ave S | 98032 |

EXHIBIT B
DECLARATIONS

**STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES**

RE: American Leadership Committee – Maine

DECLARATION OF HEATHER KASHNER

1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein.
2. I am the Chief Operating Officer of the Democratic Legislative Campaign Committee (“DLCC”). In that capacity, I oversee the DLCC’s campaign finance compliance operation.
3. The DLCC has made four contributions to ALC-ME to finance ALC-ME’s independent expenditure contributions:
 - a. \$125,000 on October 3, 2022
 - b. \$5,448.44 on October 12, 2022
 - c. \$9,513.47 on October 17, 2022
 - d. \$125,000 on October 20, 2022.
 - e. \$3,835.36 on October 21, 2022.
4. These contributions were transferred from the DLCC’s Low Individual Account, a separate bank account into which small-dollar contributions from individuals are deposited. Donors who contribute up to \$4,999.99 in a calendar year are eligible to have their funds deposited in the Low Individual Account.
5. Because DLCC contributes to reporting entities in multiple jurisdictions from the Low Individual Account, DLCC tracks in which state a donor’s contributions are spent. Once marked

as spent in a particular state, that donor's contribution is no longer eligible to be spent in any other state.

6. For example, a \$1,000 contribution from Deborah J. Simon on September 15, 2022, a \$500 contribution from Jerry Rosenstock on September 15, 2022, and a \$500 contribution from Chris Sasso on October 18, 2022 have all been designated as spent in New Hampshire and were not eligible to be part of any of the transfers identified in Paragraph 3.

7. Exhibit A is a list of donors whose contributions were in the Low Individual Account at the time of the transfers identified in Paragraph 3 and had not been designated as spent in any state. They each gave less than \$1,000 to the DLCC since November 4, 2020. They have since been marked as spent in Maine and are not eligible for use in any other state.

I declare under penalty of perjury under the laws of the State of Maine that the foregoing is true and correct.

Executed on: 10/24/2022
Date

Heather Kashner
Heather Kashner

STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES

RE: American Leadership Committee – Maine

DECLARATION OF CORY WARFIELD

1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein.
2. I am the Independent Expenditure Director for the Democratic Legislative Campaign Committee (“DLCC”).
3. In my capacity as Independent Expenditure Director, I oversee the expenditures of American Leadership Committee (“ALC”), the independent expenditure arm of the DLCC.
4. As Independent Expenditure Director, I am aware of ALC’s independent expenditure process and mail programming decisions.
5. Many factors impact ALC’s mail programming decisions, including available budget for postage, timing in the election cycle, polling data, and revenue fluctuations.
6. Sometimes, for any of the above reasons, ALC will hire a vendor to develop mail concepts but will elect not to print those concepts.
7. Additionally, for the same reasons, ALC may take advantage of bulk printing discounts to print mailers for a group of candidates but may choose to send mailers for a select few from that group.
8. This is not an extraordinary occurrence. For example, in late August of this year, ALC had designed with Moxie Media four mail pieces regarding elections in a state other than Maine. Two were sent to the printer and mailed, and ALC canceled or delayed the last two pieces.

Now, in October, ALC is using the delayed design from that mail program, which will be mailed in that state in late October. The portion of that August design fee will be included in ALC's October invoice from Moxie Media.

I declare under penalty of perjury under the laws of the State of Maine that the foregoing is true and correct.

Executed on: 10/24/2022
Date


Cory Warfield

STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES

RE: American Leadership Committee – Maine

DECLARATION OF BRIAN ZUZENAK

1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein.
2. I am a Partner with Moxie Media. Moxie Media produces political direct mail and supervises the printing and postage of such mail through sub-vendors.
3. In my capacity as Partner, I observe the mail programming decisions of our clients.
4. Sometimes, a client will engage our services at Moxie Media to design political mailers but will choose not to print those mailers.
5. Sometimes, a client will engage our services at Moxie Media to develop and print political mailers but will choose not to pay for postage for those mailers.
6. While this happens rarely, it is also not an extraordinary occurrence. Clients cutting mail programs is more likely to occur later in the election cycle, in late August through October, and may be the result of revenues falling short of projections or political strategy changing.

I declare under penalty of perjury under the laws of the State of Maine that the foregoing is true and correct.

Executed on: 10/24/2022
Date

Brian Zuzenak
Brian Zuzenak

Kim E. Pettengill
171 Northern Avenue
Farmingdale, Maine 04344
207.907.8205 kimepettengill@gmail.com

October 24, 2022

Jonathan Wayne, Executive Director
Maine Ethics Commission
135 State House Station
Augusta, Maine 04333-0135

Dear Jonathan -

I am filing a complaint against American Leadership Committee - Maine, 1125 I St., Suite 1250, Washington, DC regarding mailings sent in opposition regarding the following Republican candidates:

Jon Connor (District 9) - 2 mailings
Jennifer Marie Morin (District 20) - 1 mailing
Reagan LeeAnn Paul (District 37) - 1 mailing
Crystal Lynn Robinson (District 44) - 1 mailing
Tricia Warren (District 48) - 1 mailing
Kelly James (District 49) - 1 mailing
Linda L. Baker (District 51) - 2 mailings
Charles J. Bussell (District 54) - 2 mailings
Philip Ryan Wiseman (District 55) - 1 mailing
Corey Wilson (District 57) - 1 mailing
James E. Orr (District 59) - 2 mailings
William L. Clardy (District 60) - 1 mailing
Tiffany Estabrook (District 75) - 2 mailings
Gregory E. Foster (District 86) - 1 mailing
James William Sorcek (District 88) - 2 mailings
John Victor Chambers (District 96) - 2 mailings
David Lawrence Reed (District 105) - 1 mailing
Barbara Bagshaw (District 106) - 1 mailing
Michael Hall (District 107) - 1 mailing
Pamela Diane Buck (District 142) - 2 mailings
AnnMarie Fredericks (District 143) - 2 mailings
Timothy M. Roche (District 145) - 1 mailing
Mark Andrew Rouillard (District 149) - 2 mailings

They have sent opposition mailings regarding the Republican House candidates listed above stating that they do not have a top donor. Records on your website show that

Jonathan Wayne, Executive Director
October 24, 2022
Page 2

they have recorded expenditures on 10/12/2022 and 10/19/2022 in the total amount of \$56,661.91.

According to their finance report covering 8/23 through 9/30/2022, the largest donor to this organization is the Democratic Legislative Campaign Committee, 1125 I St., Suite 1250, Washington, DC, which has donated \$56,400.00 to the American Leadership Committee - Maine.

This is a clear violation of the state's top 3 funders rule, which requires a PAC to list the top 3 funders of their organization of at least \$1,000.

The lack of disclosure of the Democratic Legislative Campaign Committee's full involvement and support in these mailers denies voters the knowledge of the partisan intent of the message.

I respectfully request that this complaint be reviewed and acted upon as quickly as possible. Organizations such as the American Leadership Committee - Maine must be held accountable so that the citizens of Maine are informed as to who is actually funding these false statements against those who are willing to run for public office.

Sincerely,



Kim E. Pettengill

**"Abortion rights in
Maine could be at risk
if Republicans reclaim
the state government"**

10 D 1 5/16/22



**"MAINE REPUBLICAN
PARTY ADOPTS PLATFORM
AGAINST ABORTION"**

WABI 5 4/30/22

**"LePage has long
history of opposing
abortion rights"**

BEACON 5/29/22



**MAINE REPUBLICANS
WOULD TAKE AWAY
OUR RIGHTS**

WE CAN'T TRUST REPUBLICAN CHARLES BUSSELL



Now more than ever, we need a Representative who will defend our rights. But **Charles Bussell** is backed by dangerous extremists who want to limit access to abortion, even here in Maine and could become the deciding vote to ban abortion in our state. ¹

No matter how we feel about abortion personally, politicians should not be able to control people's private medical decisions.

Keep Charles Bussell OUT
of our State Legislature.

VOTE BY NOVEMBER 8

Part of by American
Leadership Committee -
Maine, 125 US NW
Ste 1250, Washington, DC
20005. NOT PAID FOR
OR AUTHORIZED BY
ANY CANDIDATE.
No top donors.

**"Abortion rights in
Maine could be at risk
if Republicans reclaim
the state government"**

10 D 1 5/16/22



**"MAINE REPUBLICAN
PARTY ADOPTS PLATFORM
AGAINST ABORTION"**

WABI 5 4/30/22

**"LePage has long
history of opposing
abortion rights"**

BEACON 5/29/22



**MAINE REPUBLICANS
WOULD TAKE AWAY
OUR RIGHTS**

WE CAN'T TRUST REPUBLICAN LINDA BAKER



PAID FOR BY AMERICAN LEADERSHIP COMMITTEE - MAINE, 1225 I ST NW, STE 1250, WASHINGTON, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors.


Now more than ever, we need a Representative who will defend our rights. But **Linda Baker** is backed by dangerous extremists who want to limit access to abortion, even here in Maine and could become the deciding vote to ban abortion in our state.¹



No matter how we feel about abortion personally, politicians should not be able to control people's private medical decisions.

Keep Linda Baker OUT
of our State Legislature.

VOTE BY NOVEMBER 8



POLITICIANS WOULD BAN ABORTION WITH NO EXCEPTIONS IN MAINE

**“Abortion rights in
Maine could be at risk
if Republicans reclaim
the state government”**

npr 5/16/22

**“MAINE REPUBLICAN
PARTY ADOPTS PLATFORM
AGAINST ABORTION”**

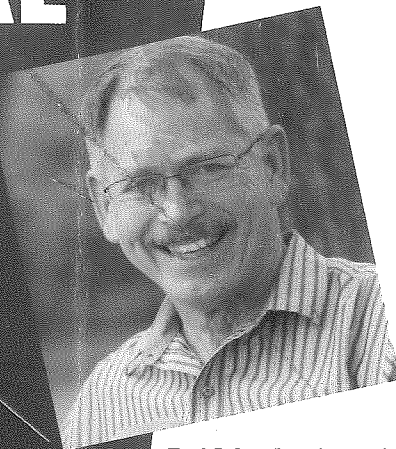
WABI 5 4/30/22

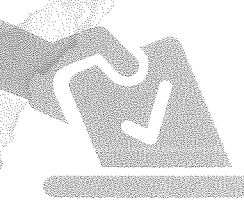
**“LePage has long
history of opposing
abortion rights”**

BEACON 6/29/22

DON'T LET REPUBLICANS LIKE WILLIAM CLARDY INTERFERE IN PRIVATE MEDICAL DECISIONS

Maine women and families have a right to make personal, private medical decisions, but **William Clardy** is backed by dangerous extremists who want to limit access to abortion, even here in Maine and could become the deciding vote to ban abortion in our state.



 **VOTE**
BY NOVEMBER 8
TO PROTECT
ABORTION FROM
POLITICIANS
LIKE WILLIAM
CLARDY.

Paid for by American Leadership Committee - Maine,
1225 I St NW Ste 1250, Washington, DC 20005.

**NOT PAID FOR OR AUTHORIZED BY ANY
CANDIDATE.**

No top donors.

  6618

PR5RT STD
US POSTAGE
PAID
STANDARD MODERN
COMPANY



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

To: Commission
From: Commission Staff
Date: October 25, 2022
Re: American Leadership Committee-Maine PAC

The Commission received a complaint from Ms. Mary Small concerning mailings sent by the American Leadership Committee-Maine PAC (the “PAC”) to oppose Republican legislative candidates. Ms. Small states that the mailings do not identify the top three funders of the PAC, which is required for most independent expenditure (IE) communications in Maine. The sample mailing she provided (opposing House candidate Linda Baker) contains the message: “No top donors.” The cost of the Baker mailing was included in an IE report filed by the PAC on October 14, 2022, which included the costs of mailings opposing ten legislative candidates totaling \$18,146. Yesterday, the Commission received a second complaint about the top 3 funder issue from Kim Pettengill (attached) and we received informal concerns from two others by email.

The PAC responded to the complaint yesterday through a letter from its counsel, the Elias Law Group. The letter is attached for your consideration, but the staff has truncated exhibit A from 280 pages to five pages. In summary, the PAC responds as follows. It is fully funded by the Democratic Leadership Campaign Committee (“DLCC”), which is a national organization dedicated to electing Democratic candidates to state office. The DLCC typically makes contributions or expenditures in more than 20 states each election cycle. To comply with the donor disclosure laws in the different states, it has set up a protocol for tracking or attributing funds it has received to specific expenditures in each jurisdiction. For purposes of disclosing donors who have funded IEs in Maine this election, the DLCC has attributed this spending to donors whose contributions to the DLCC since the November 4, 2020 election were less than \$1,000. Because these individuals gave less than \$1,000 to the DLCC in that period, the PAC is not required to name them in the mailing.

Commission staff requested additional information relevant to whether the PAC had reported the correct expenditure date in the October 14, 2022 IE report.

Relevant Laws and Rule

Commission initiation of investigation

Request from others. 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).

Preliminary investigation by staff. In addition, the Commission staff “may conduct such preliminary investigation as is deemed prudent and desirable” in the case of any inquiry or complaint filed with the Commission or if “any potential violation [] comes to the attention of Commission staff through an audit or review of reports.” 94-270 C.M.R. Ch. 1, § 5(1).

Top 3 Funder Disclosure Requirement

For decades, communications to voters in Maine advocating for or against candidates (mailings, ads, signs, *etc.*) have been required to include the name of the organization that paid for the communication. 21-A M.R.S. §§ 1014(1)&(2). In 2015, Maine joined other states in requiring that IE communications must state the “top 3 funders” of the organization that paid for the communication. 21-A M.R.S. § 1014(2-B). IEs are the costs of express advocacy communications to voters that were prepared without consultation or cooperation with the candidates in the affected races. 21-A M.R.S. § 1019-B.

The top 3 funder disclosure requirement was adopted as part of a 2015 citizen initiative promoted by election reform advocates to bolster campaign finance laws. 21-A M.R.S. § 1014(2-B). The purpose of the law is to provide members of the public with immediate information concerning the source(s) of funding for communications they have received.

Under this requirement, PACs, party committees and others engaging in IEs are required to include in the communications “the funders providing the highest dollar amount of funding to the entity making the independent expenditure since the day following the most recent general election day.” 21-A M.R.S. § 1014(2-B). Since general elections occur every two years,

practically speaking, this translates into a duty for an organization making an IE to disclose the three sources that provided the organization with the highest amounts of its funding during the previous 21-24 months.

The law specifies the language required for the disclosure statement: “The top 3 funders of (name of entity that made the IE) are (names of top 3 funders). 21-A M.R.S. § 1014(2-B). Funding sources that have given less than \$1,000 since the last general election do not need to be disclosed § 1014(2-B). The law also exempts from disclosure two categories of funds:

When compiling the list of top funders, an entity making an independent expenditure may disregard any funds that the entity can show were used for purposes unrelated to the candidate mentioned in the communication on the basis that funds were either spent in the order received or were strictly segregated in other accounts.

§ 1014(2-B)(E). This provision is discussed below in the staff analysis section of this memo.

Commission’s Rules - Top 3 Funder Requirement

In November 2015, the Commission began a rulemaking to interpret and implement the top 3 funding disclosure requirement that Maine voters adopted. One of the election reform groups responsible for the initiative urged the Commission to specifically address IEs by PACs in situations where application of the top 3 funder law might be ambiguous. In January 2016, the Commission adopted § 7(12) of the Commission’s Chapter 1 rules (attached), which included this paragraph:

D. If the communication is funded by a political action committee that is fully funded or controlled by another political action committee or legal entity, the top three funders to be listed are the top three funders of that entity that fully funds or controls the political action committee.

To illustrate the intent of this paragraph through a hypothetical, if the “Maine Justice PAC” is controlled and funded by a separate nonprofit entity “Americans for Justice,” the top 3 disclosure requirement should not be “The top funder of the Maine Justice PAC is Americans for Justice.” Rather, the paragraph was intended to require the disclosure of the top three funders of Americans for Justice that were ultimately responsible for funding the IE.

Definition of Expenditure

The term “expenditure” includes “a purchase, payment, distribution, loan, advance, deposit or gift of money anything of value made for the purpose of initiating or influencing a campaign,” and “a contract, promise, or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure for the purposes set forth in this paragraph.” 21-A M.R.S. §§ 1052(4)(A)(1)&(2). The Commission has adopted a rule (Chapter 1, § 7(3) confirming that placing an order for a good or service constitutes reportable expenditure, even if the order has not been paid for:

3. Reporting Debts and Unpaid Obligations

- A. The following events constitute expenditures, even if the payment for a good or service has not been made at the time of the event:
 - (1) The placement of an order for a good or service;
 - (2) The signing of a contract for a good or service;
 - (3) The acceptance of the delivery of a good or the performance of a service by a vendor; or
 - (4) A promise or an agreement (including an implied one) that a payment will be made in exchange for a good or service.
- B. For reporting purposes, the expenditures listed in paragraph A are designated as debts or obligations prior to payment for the goods or services being made.
- C. If a person required to file a campaign finance report has a debt or obligation which remains unpaid at the end of the report period, the person shall report the date, amount, vendor, and purpose of the debt or obligation. If the exact amount is not known, the person filing the report shall report an estimate of the amount (preferably obtained in a written statement from the vendor).
- D. If a debt or obligation occurs in the same report period as a payment for that debt or obligation, the person filing the report will report only the payment, not the debt or obligation.
- E. A candidate or committee is not required to report a payment for a good or service in a 24-Hour Report, if the candidate or committee reported a debt for that good or service in the last regularly scheduled campaign finance report.

94-270 C.M.R. ch. 1 § 7(3). In accordance with this rule, the Commission’s eFiling system is designed so that an independent spender may indicate that it is reporting an unpaid debt or obligation, rather than a payment.

Staff Analysis

The DLCC is a national organization, incorporated in Washington D.C., that is dedicated to electing Democratic candidates to state office. In the PAC’s October 24, 2022 response to the complaint, its counsel indicated that the DLCC typically promotes Democratic candidates in more than 20 states each election cycle. The Commission staff has had a brief opportunity to review the DLCC’s Form 8872 quarterly statements on file with the U.S. Internal Revenue Service (IRS). We calculate that the DLCC received \$21,463,515 in contributions during the first nine months of 2022. Judging by the third quarterly statement, most contributions received by the DLCC are from individuals in amounts of less than \$1,000 although the statement includes some donations from individuals in higher amounts and some contributions from organizations. It is clear from the statement that the DLCC has a capable bookkeeping operation.

The American Leadership Committee is also nonprofit corporation registered in Washington, D.C. In its last quarterly statement with the IRS, it reported receiving a total of \$1,443,715 from the DLCC this year (through September 30, 2022).

The American Leadership Committee registered its Maine PAC with the Commission on August 22, 2022. The PAC is fully funded by the DLCC. Its principal officer and treasurer are the chief operating officer and finance/compliance director of the DLCC, respectively. Since registering, the PAC has filed five IE reports disclosing a little less than \$350,000 on communications to oppose Republican candidates or support Democratic candidates in Maine:

| Date | Amount | Expenditure Type |
|------------|-----------|-------------------------------------|
| 10/5/2022 | \$149,000 | Social media and online advertising |
| 10/14/2022 | \$18,146 | Direct mail |
| 10/19/2022 | \$38,497 | Direct mail |
| 10/22/2022 | \$125,000 | Social media and online advertising |
| 10/23/2022 | \$17,885 | Direct Mail |

To the best of our knowledge, all the communications contain the same “No top donors” disclosure statement.

PAC's Response on Top Funder Issue

In its October 24, 2022 response, the PAC's counsel explains that the American Leadership Committee and the DLCC must comply with financial reporting and donor attribution requirements in states across the country. These state laws differ and are sometimes in conflict. The PAC argues that it attempted in good faith to comply with Maine's top 3 funder disclosure law and believes it has done so. The PAC asserts it is prepared to correct any reports or communications to comply with guidance from the Commission.

The PAC describes its procedures for complying with contribution disclosure requirements as follows:

To comply with reporting rules across multiple jurisdictions, the DLCC has adopted a protocol for tracking which donors' funds are used in each jurisdiction. Prior to, or within a reasonable time after, funds are spent in a state, the DLCC identifies the donors whose funds were used to make the applicable contribution or expenditure. Once marked as spent in a particular state, that donor's contribution is no longer eligible to be spent in any other state.

The PAC states that in advance of the 2022 elections, the DLCC decided to fund IE communications from a separate bank account for "small-dollar" contributions it has received from individuals (up to \$4,999.99), referred to as the Low Individual Account. The PAC further explains:

Moreover, the DLCC determined that it would attribute its contributions to ALC-ME only to donors whose contributions since November 4, 2022 were less than \$1,000 in the aggregate, provided that sufficient funds of that type remained in the Low Individual Account at the time of each contribution.

The PAC has submitted a declaration from its chief operating officer stating that, in order to finance independent expenditures in Maine, the DLCC made five transfers during October 3-21, 2022 from its Low Individual Account to the separate bank account established for the PAC.

In explaining its rationale for the "No top donors" disclosure statement, the PAC relies on § 1014(2-B)(D):

D. When compiling the list of top funders, an entity making an independent expenditure may disregard any funds that the entity can show were used for purposes unrelated to the candidate mentioned in the communication on the basis

that funds were either spent in the order received or were strictly segregated in other accounts.

The PAC argues that, for purposes of complying with the top 3 funder requirement, this rule permits the PAC to use a reasonable accounting method to attribute its IEs in Maine to specific donors that have contributed to the DLCC since the November 2020 general election.

The Commission staff questions whether this is a correct reading of the statute, both in terms of the law's intent and language. The top 3 funder disclosure requirement, enacted by Maine voters in 2015, was intended to require PACs, party committees and others to disclose their three *highest* funding sources since the last general election. In contrast, the PAC is proposing to attribute its roughly \$350,000 in IEs in Maine to some of its *smaller* donors who gave less than \$1,000 with the effect that no donors would be disclosed to the Maine public. This seems contrary to public disclosure goal that the 2015 initiative envisioned.

Subsection 1014(2-B)(D) is intended to allow PACs and others to exclude funding sources in two categories:

- (1) a funder whose donation was *deposited into a separate account* that was used for some purpose other than independent expenditures (*e.g.*, lobbying or education).
- (2) *based on the order in which it was received*, a funder's donation that can be shown to have been spent on other purposes. For example, for purposes of an IE made in October 2022, a PAC may be entitled to exclude a contribution received 1½ years earlier in January 2021 if it believes it can demonstrate that particular donation was spent in early 2021 on some other purpose.

The statute does not include language suggesting that these categories were examples and that other accounting methods would be permissible to exclude additional funders from public disclosure. We are concerned that allowing a PAC or party committee to use its own discretion to "attribute" an expenditure to this or that donor (no matter how large or small) could lead to circumvention of the intent of the law, which is the disclosure of the three highest funding sources since the last general election.

The Commission staff respects that complying with multiple states' campaign finance laws can be a challenge, but that is a burden that the DLCC has chosen to accept by advocating for candidates in more than 20 states. The duty for the DLCC is to comply with each state's distinctive disclosure requirements, regardless how it has attributed its contributions in other

states' reporting systems. In the DLCC's third quarter IRS statement (July 1 – September 30, 2022), it reported received money from multiple individuals who gave the DLCC a total of \$1,000, \$2,000, \$3,500, or \$4,000 during 2022. These donations were presumably deposited in the DLCC's Low Individual Account that was used to finance IEs in Maine. In the opinion of the Commission staff, the PAC has not presented a good reason why these donors should have been excluded from the top 3 funder disclosure requirement. We recognize that factual information and legal argument are being presented to you in a compressed time period, but we currently tend toward the view that the "No Top Donors" disclosure statement in the PAC's IE communications does not meet the requirements of 21-A M.R.S. § 1014(2-B).

Expenditure Date of Independent Expenditure Report

In the IE report that is the subject of Ms. Small's complaint, the PAC reported the date of October 12, 2022 for its expenditure of \$18,146 to Moxie Media of Seattle. The postage language on the mailings suggests that they were printed by a company physically located about 50 miles south of Boston. The PAC explains that:

- templates were sent to the printer on Wednesday, October 5, 2022,
- postage was invoiced on Saturday, October 8, 2022, and
- the mailings were deposited at the U.S. Postal Service facilities in Hampden or Portland on Thursday, October 13, 2022.

The PAC contends, however, that the correct expenditure date is Wednesday, October 12. According to the PAC, that is the date that it paid the postal invoice and made a promise to move forward with the mailing as printed.

The Commission staff recommends viewing this explanation critically. Through its counsel and accompanying declarations, the PAC explains that American Leadership Committee sometimes orders the design of literature that is not subsequently printed for reasons of budget, timing, or revenue fluctuations. The PAC and its vendor, however, have not cited a single supporting example in which the American Leadership Committee or the DLCC declined to send literature that had been previously *printed*. In the first nine months of 2022, the American Leadership Committee received substantial revenue from the DLCC (a little more than \$1.4 million) which hopefully would provide some financial stability in funding IEs. Since the PAC ordered literature to be printed on October 5 (or shortly afterward) and was given an invoice for

a specific postage amount on October 8, these actions may be sufficient to conclude that the PAC had entered into an express or implied agreement during October 5-8 to pay for mailings, which would have required the PAC to file an IE report sometime in the range of October 7-10.

The Commission staff recognizes this timing issue was not part of Mary Small's original complaint. It is within the Commission's discretion whether to invest further resources on this timeliness issue. Thank you for your consideration of this memo.

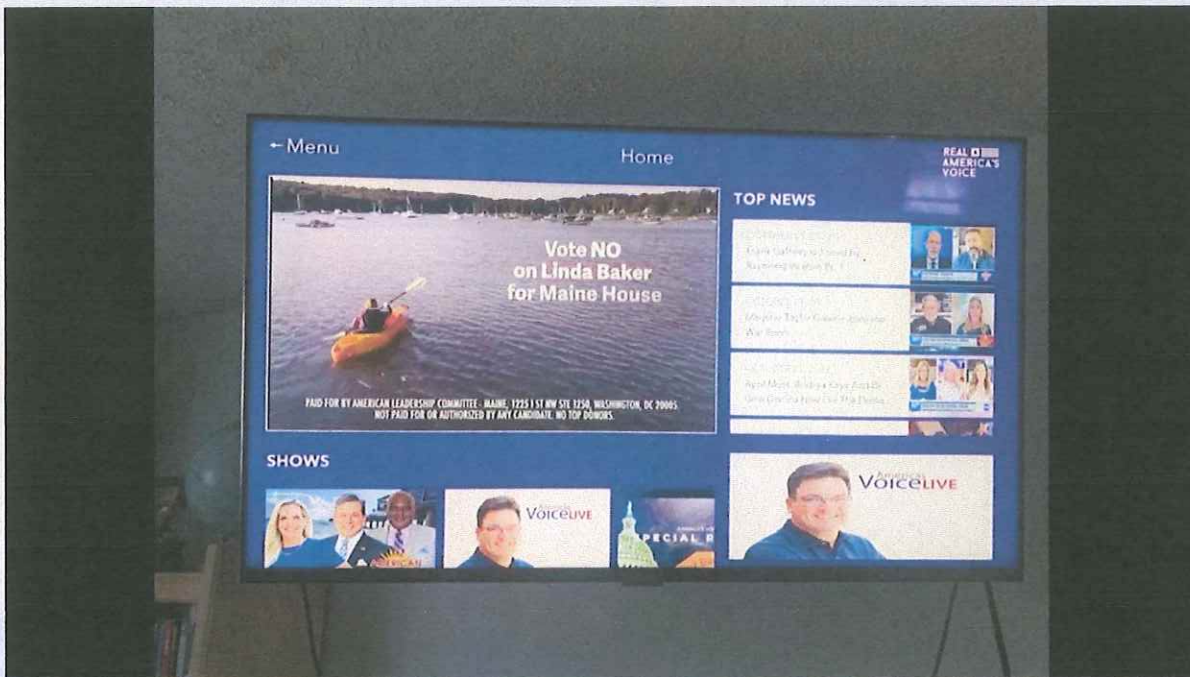
American Leadership Committee – Digital Advertisements

Provided by Complainant Kim Pettengill

October 26, 2022



13



noooooooo Leslie Jordan is gone!!!!!!!

5

Like Comment Send

American Leadership Committee Paid for by American Leadership Committee

If Republicans had their way, abortion could be outlawed in Maine. We have the power... See more



maine-leadership.com Vote by November 8th

Learn more

1 2 comments 411 views

Like Comment Share

Melissa Black Canty is at Hyatt Regency IEK at Resorts World

- Home News Marketplace Feeds Notifications Menu

November 16, 2022

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

RE: American Leadership Committee – Maine

Dear Commissioners:

We write on behalf of American Leadership Committee—Maine (“ALC-ME”) regarding the Commission’s consideration of civil penalties against ALC-ME. This response aims to address the questions that Jonathan Wayne posed in his letter dated October 28, 2022. But if there is additional information that would assist the Commission in reaching a determination, please let us know.

After the Commission’s October 26, 2022, meeting, ALC-ME acted quickly to correct the disclaimers on its paid communications—in accordance with the Commission’s recommendation—and incurred significant expenses to do so. The DLCC donors disclosed on these communications had already been publicly disclosed, like every other DLCC donor who contributes more than \$200 per year. While ALC-ME respects the Commission’s decision, the fact that the complainant, the respondent, the Commission’s staff, and the commissioners interpreted the statute differently underscores that its application to this set of facts was not clear. ALC-ME respectfully requests that the Commission exercise its authority to waive the penalty if the person who financed the communication corrects the violation within 10 days after receiving notification of the violation by adding the missing information.

Since the issue was raised by Commission staff, ALC-ME has sought guidance from the Commission on how to amend its independent expenditure report both before and after the October 26, 2022, meeting. To date, ALC-ME has not received instructions on which was the appropriate date to include on the independent expenditure report. Because ALC-ME has proved willing to cooperate and amend its report, and the harm to the public was minimal since the report was available on the same day that voters received the mailer at issue, ALC-ME respectfully requests that the Commission use this opportunity to set a clear rule going forward and not penalize ALC-ME with monetary penalties for its good-faith effort to comply.

I. Disclaimer

A. Remedial efforts since finding of violation at October 26, 2022 Meeting

On October 26, 2022, the Commission voted that ALC-ME violated Maine law by including “no top donors” on its disclaimer. No mailer had been disseminated and no digital ad had been uploaded between October 22 and October 26; the last communication to have been mailed or uploaded was on October 21.

At the hearing, the Commission determined that the “no top donors” disclaimer was insufficient but did not prescribe what the correct disclaimer should be. The October 25 staff analysis indicated that the top donors in DLCC’s Low Individual Account should be included in the disclaimer.¹ But after the hearing, following a discussion between staff and commissioners, the advice changed. The staff instructed ALC-ME to instead list “the three sources that provided the highest amount of aggregate funding to the overall DLCC organization from November 4, 2020 to the present time.”² Upon receiving that advice, ALC-ME acted immediately to work with the DLCC, its digital ad vendor, and its mail vendor to (1) identify the three donors who needed to be included in updated disclaimers and (2) update the disclaimers on all of its digital ads and future mailers, as described below.

Mail Flight 4: This flight of mail was printed on October 24 with the “no top donors” disclaimer. The original plan was to mail this flight on October 26. Upon receiving the staff analysis on October 25—the first Commission analysis indicating disagreement with ALC ME’s position—ALC-ME paused distribution of Mail Flight 4. Mail Flight 4 was never sent. The production and design costs for Mail Flight 4 were \$20,926.99, with an estimated additional \$1,500 for printing. That \$22,462.99 expense was reported as a debt on ALC-ME’s 11-day report per instructions we received from Ms. Emma Burke, Political Committee & Lobbyist Registrar.³

Mail Flight 5: This flight of mail was scheduled to be printed on October 26 (“Mail Flight 5”). It was put on hold; then, following the hearing, ALC-ME affixed the Commission-prescribed disclaimer to the mailers (see Exhibit A). On November 1, ALC-ME sent Mail Flight 5 to every voter who received any of Mail Flights 1-3. Thus, every voter who received a mailer from ALC-ME with the “no top donors” disclaimer also received a mailer from ALC-ME that listed the top-three funders to the DLCC.

Digital ads: Upon receiving the staff analysis on October 25, ALC-ME paused purchase of new digital ads. On October 27, the vendor produced updated ads with the new disclaimers for communications running in 25 districts. Upon review by ALC-ME for accuracy of the disclaimer, the vendor began replacing the ads on three platforms: Programmatic Digital Advertising (i.e., Hulu), Facebook, and YouTube. Each of these platforms has different internal rules and processes that affect the immediacy of when changes take effect. Facebook conducts a review of political ads that can delay updates. YouTube has an unpublished daily upload limit. Once the limit is reached, ALC-ME cannot upload any more videos that day and must wait until the next day, including to update disclaimers on digital ads already running. So while the digital vendor worked to change the disclaimers on all digital ads as quickly as possible, some delays in specific districts meant that not every disclaimer was updated on October 27 when the vendor began the process to change the disclaimers. All Programmatic ads had the correct disclaimer on October 27, Facebook ads had the accurate disclaimer starting October 28 and 29, and the

¹ Maine Commission on Governmental Ethics and Election Practices Commission Staff Memo, *American Leadership Committee-Maine PAC* (Oct. 25, 2022) at 8 (“In the DLCC’s third quarter IRS statement (July 1 – September 30, 2022), it reported received money from multiple individuals who gave the DLCC a total of \$1,000, \$2,000, \$3,500, or \$4,000 during 2022. These donations were presumably deposited in the DLCC’s Low Individual Account that was used to finance IEs in Maine. In the opinion of the Commission staff, the PAC has not presented a good reason why these donors should have been excluded from the top 3 funder disclosure requirement.”)

² Email from Jonathan Wayne to Emily Hogin (Oct. 26, 2022 at 2:11 p.m.) (on file with author).

³ Email from Emma Burke to Emily Hogin (Oct. 27, 2022 at 3:23 p.m.) (on file with author).

YouTube ads were correct on October 29 through November 1. Exhibit B lists all of ALC-ME's independent expenditures for digital ads, the disclaimer that originally appeared on the ad, the updated disclaimer, and the date the updated disclaimer appeared on Programmatic Digital Advertising, Facebook, or YouTube.

Exhibit C is a screenshot of a video uploaded to YouTube on October 27, 2022, to be promoted as a digital ad with the updated disclaimer.⁴ To place an ad on YouTube, the platform requires that advertisers upload the video to a free YouTube page and then the video is subject to the company's internal review process. Under that review process, this ad was served to voters beginning October 29, 2022.

B. Information on mail pieces disseminated

Exhibit D lists ALC-ME's independent expenditures for mailers to date and the disclaimer that appeared on each communication:

- Mail Flight 1 was reported on October 14 and included 11,543 pieces of mail.
- Mail Flight 2 was reported on October 19 and included 30,787 pieces of mail.
- Mail Flight 3 was reported on October 23 and included 16,530 pieces of mail.

C. Response to allegations from members of public regarding shielding of donors

The DLCC is *not* a “dark money” organization. It publicly discloses all donors that contribute more than \$200 per calendar year, as required by law. Therefore, neither ALC-ME nor the DLCC had an incentive or desire to shield its donors from Maine's voters or from the voters from any state. Had ALC-ME followed the direction originally prescribed in the Commission staff's memorandum dated October 25, it would have disclosed the names of three individual donors to the DLCC who are almost certainly unknown to Maine voters and whose inclusion on the disclaimer, in ALC-ME's view, would have had no impact whatsoever on how Maine voters reacted to the mailers.

Likewise, ALC-ME would have gladly disclosed DLCC as a top funder—as the complainant suggested it should have done at the hearing—had it believed that doing so complied with Maine

⁴ Complainant Kim Pettengill claims that a digital video supporting Tavis Hasenfus with the “no top donors” disclaimer “ran on 11/3 at approximately 12:16 PM.” That is inconsistent with ALC-ME's review of its digital ad spending, and the screenshot Ms. Pettengill includes does not include a date stamp other than to say it was uploaded three weeks prior to when the screenshot was taken and viewed 18 times. ALC-ME believes that Ms. Pettengill was not served this digital ad but instead searched for and found a YouTube channel on which ALC-ME videos were uploaded prior to their distribution as paid digital ads. YouTube ads are clearly marked with “Ad” in the bottom left corner, do not show the number of views, do not show how long ago it was uploaded, do not show the video's title, have a yellow progress bar as opposed to the red one shown in the screenshot, and do not permit the viewer to replay the ad.

As discussed above, YouTube requires videos that will be promoted as digital ads to be uploaded to a YouTube page; however, a video is not automatically taken down from the free page when it is no longer being run as a digital ad. The free YouTube page was never intended to reach Maine voters except in order to meet YouTube's technical requirement that videos be “parked” on a YouTube page before they can be promoted.

law. But as the Commission staff confirmed at the hearing, disclosing the DLCC as a top donor did not comply with Maine law. So ALC-ME did not disclose DLCC as a top donor on its filing.

Instead, ALC-ME used the same donor assignment methodology that its sole funder, the DLCC, uses in states across the country. To comply with reporting rules across multiple jurisdictions, the DLCC has adopted a protocol for tracking which donors' funds are used in each jurisdiction. Prior to, or within a reasonable time after, funds are spent in a state, the DLCC identifies the donors whose funds were used to make the applicable contribution or expenditure. Once marked as spent in a particular state, that donor's contribution is no longer eligible to be spent in any other state. While ALC-ME accepts the Commission's conclusion that the DLCC's standard methodology does not comply with Maine law, it strongly disputes any insinuation that its standard methodology—which assures that all donors are disclosed in states and that no donors are double-counted—is an effort to shield donors.

Moreover, the fact that the respondent, the complainant, the Commission staff, and the commissioners each reached a different interpretation of the same statute and corresponding regulation suggests that the laws in question are not clear in their application to this set of facts. Had ALC-ME followed the *complainant's* preferred read of the statute, the Commission staff and the Commission would have found ALC-ME in violation of the law; had ALC-ME followed the *staff's* preferred read of the statute, the Commission would have found ALC-ME in violation of the law. That is, of course, within the Commission's authority. But if there are multiple potential interpretations of a rule, that should strongly mitigate any penalty that the Commission levies for choosing the “wrong” one. That is precisely what happened here.

D. Why penalties should be waived or mitigated

A violation of the disclaimer provision is subject to a civil penalty of not more than 100% of the cost of the communication.⁵ In determining the amount of a penalty, the commission must consider, “among other things, how widely the communication was disseminated, whether the violation was intentional, whether the violation occurred as the result of an error by a printer or other paid vendor and whether the communication conceals or misrepresents the identity of the person who financed it.”⁶ The violation here was *not* intentional for the reasons set forth above. Nor is there any allegation that the communication conceals or misrepresents the identity of the person who financed it. In fact, each communication prominently displayed ALC-ME as the entity that paid for the communication.

Additionally, “[i]f the person who financed the communication or who committed the violation corrects the violation within 10 days after receiving notification of the violation from the commission by adding the missing information to the communication, the commission may decide to assess no civil penalty.”⁷ Here, ALC-ME worked diligently to update its disclaimers on communications and corrected all violations within 10 days of the hearing. Moreover, ALC-ME has already incurred an estimated \$22,462.99 in compliance costs by withholding Mail Flight 4. Accordingly, no penalty is warranted.

⁵ Me. Rev. Stat. tit. 21-A § 1014(4).

⁶ *Id.*

⁷ *Id.*

II. Reporting violation

A. Cost estimates from Moxie Media

ALC-ME generally communicated its plans for specific mailers, including the number of mailers and districts, with Moxie Media via phone. Moxie Media communicates with its printing sub-vendors by uploading the information into a software system in which details like the intended recipients, the number of mailers, and the date the mailer should be deposited with the United States Postal Service frequently change. The printer can access this information generally at any time. ALC-ME provided final approval on the creative for Mail Flight 1 to Moxie Media via e-mail on October 4, 2022. Moxie Media transmitted that mailer to the printer on October 5, 2022. ALC-ME received an invoice that included printing and design services for Mail Flight 1 via an email from Moxie Media on October 8, 2022. Cory Warfield forwarded that email on October 10 to the compliance and billing departments of the DLCC, who were also supporting ALC-ME, indicating it was “approved for payment on 10/11.” The mailers were printed on October 10.

B. Invoices and written estimates

These documents are attached as Exhibit E.

C. ALC-ME’s efforts to comply

When making independent expenditures by mail, ALC-ME’s parent entity, American Leadership Committee (“ALC”) will hire a mail vendor to develop mail concepts for multiple candidates and across multiples states, but not all of these concepts will make it to print. For those that do make it to print, ALC may take advantage of bulk printing discounts to print mailers for a group of candidates, but ultimately send mailers to just some of the candidates depending on the available budget for postage. Postage is pre-paid, but design and printing costs are paid 60 days in arrears. ALC generally considers an expenditure final when the postage has been paid, as it is unlikely to be cancelled after that date.

For the mailer at issue here, ALC-ME reported October 12 as the expenditure date. October 12 represented the date that the first payment for the mailer was made (pre-payment for postage). Moxie Media sent the templates to the printer on October 5, but the mailer was not printed until October 10. ALC-ME received an invoice for the postage on October 8. The mailer was deposited with the United States Postal Service on October 13. It arrived on voters’ doorsteps as early as October 14, which is the same day that the 48-hour report was filed.

The question regarding the timeliness of ALC-ME’s independent expenditure report was raised by Commission staff and not by any complainants. Commission staff offered ALC-ME the opportunity to work with Ms. Burke to amend its independent expenditure reports and resolve this issue prior to the Commission hearing.⁸ Counsel for ALC-ME discussed its mail design, production, and distribution process in detail with Ms. Burke in the interest of amending the report before the October 26 hearing. Ms. Burke advised that ALC-ME and other committees would benefit from the Commission weighing in on the appropriate date that the independent expenditure was “made” and that this case presented a good opportunity to do so. Believing that

⁸ Email from Jonathan Wayne to Emily Hogin (Oct. 20, 2022 at 11:25 a.m.) (on file with author).

it had complied with the law—and not having a clear indication of which date that the Commission believed to be a correct alternative—ALC-ME did not amend prior to the hearing.

During the hearing, the Commission voted that October 12 date was too late, but did not instruct ALC-ME which date the committee should have reported. Following the hearing, ALC-ME again offered to amend its reports.⁹ To date, Commission staff has yet to instruct ALC-ME on which date to use. As with the disclaimer, the fact that so many people looking at the same issue arrive at different answers indicates that the existing rules do not clearly apply to the situation at hand.

The penalty for filing a late report is a percentage of the total contributions or expenditures for the filing period, whichever is greater, multiplied by the number of calendar days late: for the first violation, this percentage is 2%; for the second, it is 4%; and for the third and subsequent violations, the penalty is 6%.¹⁰ The Commission may waive the 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.”¹¹ The Commission may also waive the penalty in whole or in part for any of a number of mitigating circumstances, which include “an error by the commission staff” and “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.”¹²

Here, any harm to the public from late disclosure is minimal—the public had the independent expenditure report on the same day that mailers first arrived at voter’s inboxes. This is ALC-ME’s first attempt to comply with Maine’s unusual reporting rules, and ALC-ME has proved willing to cooperate and amend its reports. The Commission should use this opportunity to set a clear rule going forward and should not penalize ALC-ME with monetary penalties for its good-faith effort to comply.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jon Berkon", with a stylized flourish extending to the right.

Jonathan Berkon
Emily Hogin
Counsel to American Leadership Committee - Maine

⁹ Email from Emily Hogin to Jonathan Wayne (Oct. 26, 2022 at 1:25 p.m.) (on file with author).

¹⁰ Me. Rev. Stat. tit. 21-A, § 1020-A(4-A).

¹¹ *Id.* § 1020-A(2)

¹² *Id.*



OF ALL THE THINGS TO WORRY ABOUT



**WHETHER THIS IS SAFE
SHOULDN'T BE ONE OF THEM**

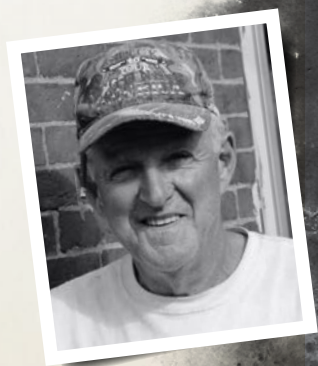


JOHN “JAKE” CHAMBERS CAN’T BE TRUSTED TO KEEP OUR WATER SAFE

Paid for by American Leadership
Committee—Maine, 1225 I ST NW
Ste 150, Washington, DC 20005. NOT
PAID FOR OR AUTHORIZED BY
ANY CANDIDATE. The top 3 funders
of American Leadership Committee—
Maine are American Federation of State,
County and Municipal Employees,
Emerging American Majorities, and
American Federation of Teachers.

Our representatives should prioritize our health, not the agenda of special interests who want to roll back basic environmental protections.

John “Jake” Chambers is backed by dangerous extremists who want to roll back basic clean water protections and **allow so-called forever chemicals called PFAS to stay in our water forever, leading to cancer, birth defects, and immune system problems.**¹



VOTE BY NOV 8 PROTECT OUR DRINKING WATER FROM JOHN “JAKE” CHAMBERS

CHECK THE FACTS: 1] Maine Republican Party Platform, accessed 10/4/22
ETH:68

PGERT STD
US POSTAGE
PAID
BROCKTON MA
PERMIT NO 2688

American Leadership Committee - Maine

Date Updated Disclaimer Appeared

| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Facebook | Programmatic | YouTube |
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| ME Digital Piece 1 | Silversmith Strategies | \$8,750.00 | Digital Communications | 10/3 | \$8,750.00 | | | | | | | | | |
| | | \$350.00 | | | | Anne Perry | Support | House | 9 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$350.00 | | | | Kevin O’Connell | Support | House | 20 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$350.00 | | | | Maggie English-Flanagan | Support | House | 37 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | | \$350.00 | | | | Bill Pluecker | Support | House | 44 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$350.00 | | | | Holly Stover | Support | House | 48 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | \$350.00 | | | | Allison Hepler | Support | House | 49 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$350.00 | | | | Becky Jauch | Support | House | 51 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$350.00 | | | | Karen Montell | Support | House | 54 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | \$350.00 | | | | Dan Shagoury | Support | House | 55 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |

American Leadership Committee - Maine

| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Date Updated Disclaimer Appeared | | |
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| | | | | | | | | | | | | Facebook | Programmatic | YouTube |
| | | \$350.00 | | | | Tavis Hasenfus | Support | House | 57 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | Raegan LeRochelle | \$350.00 | | | | | Support | House | 59 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | Bill Bridgeo | \$350.00 | | | | | Support | House | 60 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | Scott Landry | \$350.00 | | | | | Support | House | 75 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | Walter Riseman | \$350.00 | | | | | Support | House | 83 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | Jess Fay | \$350.00 | | | | | Support | House | 86 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | Kathy Shaw | \$350.00 | | | | | Support | House | 88 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | Adam Lee | \$350.00 | | | | | Support | House | 89 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | Mike Lajoie | \$350.00 | | | | | Support | House | 96 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |

American Leadership Committee - Maine

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|--------------------|------------------------------|--------------|----------------|----------------------------|--------------|-----------------------|---------|---------------|----------|---|---|------------|--------------|------------|
| | | | | | \$350.00 | Annie Graham | Support | House | 105 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | \$350.00 | Dana Reed | Support | House | 106 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | \$350.00 | Jane Pringle | Support | House | 107 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | | | | \$350.00 | Anne-Marie Mastraccio | Support | House | 142 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 11/1/2022 |
| | | | | | \$350.00 | Wes Davie | Support | House | 143 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | | | | \$350.00 | Dan Hobbs | Support | House | 145 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | | | | \$350.00 | Tiffany Roberts | Support | House | 149 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 11/1/2022 |
| ME Digital Piece 1 | Subvendor: Uplift Strategies | \$116,250.00 | Digital Ad Buy | 10/3 | \$116,250.00 | | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | | |
| | | | | | \$4,650.00 | Anne Perry | Support | House | 9 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |

American Leadership Committee - Maine

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| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Facebook | Programmatic | YouTube |
| | | \$4,650.00 | | | | Kevin O'Connell | Support | House | 20 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | Maggie English-Flanagan | \$4,650.00 | | | | | Support | House | 37 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | Bill Pluecker | \$4,650.00 | | | | | Support | House | 44 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | Holly Stover | \$4,650.00 | | | | | Support | House | 48 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | Allison Hepler | \$4,650.00 | | | | | Support | House | 49 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | Becky Jauch | \$4,650.00 | | | | | Support | House | 51 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | Karen Montell | \$4,650.00 | | | | | Support | House | 54 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | Dan Shagoury | \$4,650.00 | | | | | Support | House | 55 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | Tavis Hasenfus | \$4,650.00 | | | | | Support | House | 57 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | Raegan LeRochelle | \$4,650.00 | | | | | Support | House | 59 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | Bill Bridgeo | \$4,650.00 | | | | | Support | House | 60 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |

American Leadership Committee - Maine

Date Updated Disclaimer Appeared

| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Facebook | Programmatic | YouTube |
|---------|-------------|------------|---------|----------------------------|--------|-----------------------|---------|---------------|----------|---|---|------------|--------------|------------|
| | | \$4,650.00 | Support | | | Scott Landry | Support | House | 75 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$4,650.00 | Support | | | Walter Riseman | Support | House | 83 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | Support | | | Jess Fay | Support | House | 86 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | Support | | | Kathy Shaw | Support | House | 88 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | | \$4,650.00 | Support | | | Adam Lee | Support | House | 89 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | Support | | | Mike Lajoie | Support | House | 96 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | Support | | | Annie Graham | Support | House | 105 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | Support | | | Dana Reed | Support | House | 106 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | \$4,650.00 | Support | | | Jane Pringle | Support | House | 107 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 11/1/2022 |
| | | \$4,650.00 | Support | | | Anne-Marie Mastraccio | Support | House | 142 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | \$4,650.00 | Support | | | Wes Davie | Support | House | 143 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |

American Leadership Committee - Maine

Date Updated Disclaimer Appeared

| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Facebook | Programmatic | YouTube | |
|-----------------------------|------------------------|-------------|-----------------------|---|---|----------------|----------------------|---------------|----------|---|---|---|--------------|------------|-----------------|
| ME Digital Ad Piece 1 and 2 | Silversmith Strategies | \$26,950.65 | Digital Ad Production | 10/3 | \$26,950.65 | Dan Hobbs | Support | House | 145 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 | |
| | | | | | | | | | | | | | | | Tiffany Roberts |
| | Unpaid | | | | | | Phillip Wiseman | Oppose | House | 55 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | | | | | | Jon Connor | Oppose | House | 96 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | | | John "Jake" Chambers | Oppose | House | 9 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | | | | | | Gregory Foster | Oppose | House | 86 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | | | Adam Lee | Support | House | 89 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | | | Jessica Fay | Support | House | 86 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | | | Jennifer Morin | Oppose | House | 20 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | | | | | | | Barbara Bagshaw | Oppose | House | 106 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| Corey Wilson | Oppose | House | 57 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 | | | | | | | |

American Leadership Committee - Maine

| | | | | | | | | | | | | Date Updated Disclaimer Appeared | | |
|---------|-------------|----------|------------------|----------------------------|--------|----------------|--------|---------------|----------|---|---|----------------------------------|--------------|------------|
| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Facebook | Programmatic | YouTube |
| | | \$539.01 | David Reed | Oppose | House | 105 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.01 | Tricia Warren | Oppose | House | 48 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$539.01 | Timothy Roche | Oppose | House | 145 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | \$539.01 | Daniel Shagoury | Support | House | 55 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$539.01 | Tiffany Roberts | Support | House | 149 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 11/1/2022 |
| | | \$539.01 | Crystal Robinson | Oppose | House | 44 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.01 | Rebecca Jauch | Support | House | 51 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.01 | Allison Hepler | Support | House | 49 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$539.01 | Scott Landry | Oppose | House | 75 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$539.01 | Annie Graham | Support | House | 105 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.01 | Pamela Buck | Oppose | House | 142 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |

American Leadership Committee - Maine

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|---------|-------------|----------|---------------------------|----------------------------|--------|----------------|--------|---------------|----------|---|---|------------|--------------|------------|
| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Facebook | Programmatic | YouTube |
| | | \$539.01 | Holly Stover | Support | House | 48 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$539.01 | Daniel Hobbs | Support | House | 145 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | \$539.01 | Anne Perry | Support | House | 9 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$539.01 | William Bridgeo | Support | House | 60 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.01 | Donna Dodge | Oppose | House | 83 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.01 | William Pluecker | Support | House | 44 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.01 | Walter Riseman | Support | House | 83 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.01 | Margaret English-Flanagan | Support | House | 37 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$539.01 | Tavis Hasenfus | Support | House | 57 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$539.01 | Michael Hall | Oppose | House | 107 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 11/1/2022 |
| | | \$539.01 | Tiffany Estabrook | Oppose | House | 75 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |

American Leadership Committee - Maine

| | | | | | | | | | | | Date Updated Disclaimer Appeared | | | |
|---------|-------------|----------|-------------------|----------------------------|--------|----------------|--------|---------------|----------|---|---|------------|--------------|------------|
| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Facebook | Programmatic | YouTube |
| | | \$539.01 | Reagan Paul | Oppose | House | 37 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | | \$539.01 | Charles Bussell | Oppose | House | 54 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$539.02 | Karen Montell | Support | House | 54 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$539.02 | Kathleen Shaw | Support | House | 88 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | | \$539.02 | Reagan LaRochelle | Support | House | 59 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.02 | James Orr | Oppose | House | 59 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.02 | William Clardy | Oppose | House | 60 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.02 | Kevin O'Connell | Support | House | 20 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | | \$539.02 | Wes Davie | Support | House | 143 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | \$539.02 | Benjamin Weisner | Oppose | House | 89 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$539.02 | Jane Pringle | Support | House | 107 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 11/1/2022 |

American Leadership Committee - Maine

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| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Facebook | Programmatic | YouTube |
|--------------------|------------------------|------------|------------------------|----------------------------|-------------------|-----------------------|---------|---------------|----------|---|---|------------|--------------|------------|
| | | | | | \$539.02 | Ann Marie Fredericks | Oppose | House | 143 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | | | | \$539.02 | Dana Reed | Support | House | 106 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | | | | \$539.02 | James Sorcek | Oppose | House | 88 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | | | | | \$539.02 | Michel Lajoie | Support | House | 96 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | \$539.02 | Anne-Marie Mastraccio | Support | House | 142 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | | | | \$539.02 | Kelly James | Oppose | House | 49 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| ME Digital Piece 2 | Silversmith Strategies | \$8,750.00 | Digital Communications | 10/21 | \$8,750.00 | | | | | | | | | |
| | | | | | \$350.00 | John "Jake" Chambers | Oppose | House | 9 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | \$350.00 | Jennifer Morin | Oppose | House | 20 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | | | | \$350.00 | Reagan Paul | Oppose | House | 37 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | | | | | \$350.00 | Crystal Robinson | Oppose | House | 44 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | | | | \$350.00 | Tricia Warren | Oppose | House | 48 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |

American Leadership Committee - Maine

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| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Facebook | Programmatic | YouTube |
|---------|-------------|----------|---------|----------------------------|--------|-------------------|--------|---------------|----------|---|---|------------|--------------|------------|
| | | \$350.00 | | | | Kelly James | Oppose | House | 49 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$350.00 | | | | Linda Baker | Oppose | House | 51 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$350.00 | | | | Charles Bussell | Oppose | House | 54 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | \$350.00 | | | | Phillip Wiseman | Oppose | House | 55 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$350.00 | | | | Corey Wilson | Oppose | House | 57 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$350.00 | | | | James Orr | Oppose | House | 59 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$350.00 | | | | William Clardy | Oppose | House | 60 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$350.00 | | | | Tiffany Estabrook | Oppose | House | 75 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$350.00 | | | | Donna Dodge | Oppose | House | 83 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$350.00 | | | | Gregory Foster | Oppose | House | 86 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$350.00 | | | | James Sorcek | Oppose | House | 88 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |

American Leadership Committee - Maine

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| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Facebook | Programmatic | YouTube |
|--------------------|------------------------------|------------|----------------|----------------------------|---------------------|----------------------|--------|---------------|----------|---|---|------------|--------------|------------|
| | | | | | \$350.00 | Benjamin Weisner | Oppose | House | 89 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | | | | | \$350.00 | Jon Connor | Oppose | House | 96 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | \$350.00 | David Reed | Oppose | House | 105 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | \$350.00 | Barbara Bagshaw | Oppose | House | 106 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | \$350.00 | Michael Hall | Oppose | House | 107 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | | | | \$350.00 | Pamela Buck | Oppose | House | 142 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 11/1/2022 |
| | | | | | \$350.00 | Ann Marie Fredericks | Oppose | House | 143 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | | | | \$350.00 | Timothy Roche | Oppose | House | 145 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | | | | \$350.00 | Mark Rouillard | Oppose | House | 149 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 11/1/2022 |
| ME Digital Piece 2 | Subvendor: Uplift Strategies | \$8,750.00 | Digital Ad Buy | 10/21 | \$116,250.00 | | | | | | | | | |
| | | | | | \$4,650.00 | John "Jake" Chambers | Oppose | House | 9 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | | | | \$4,650.00 | Jennifer Morin | Oppose | House | 20 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |

American Leadership Committee - Maine

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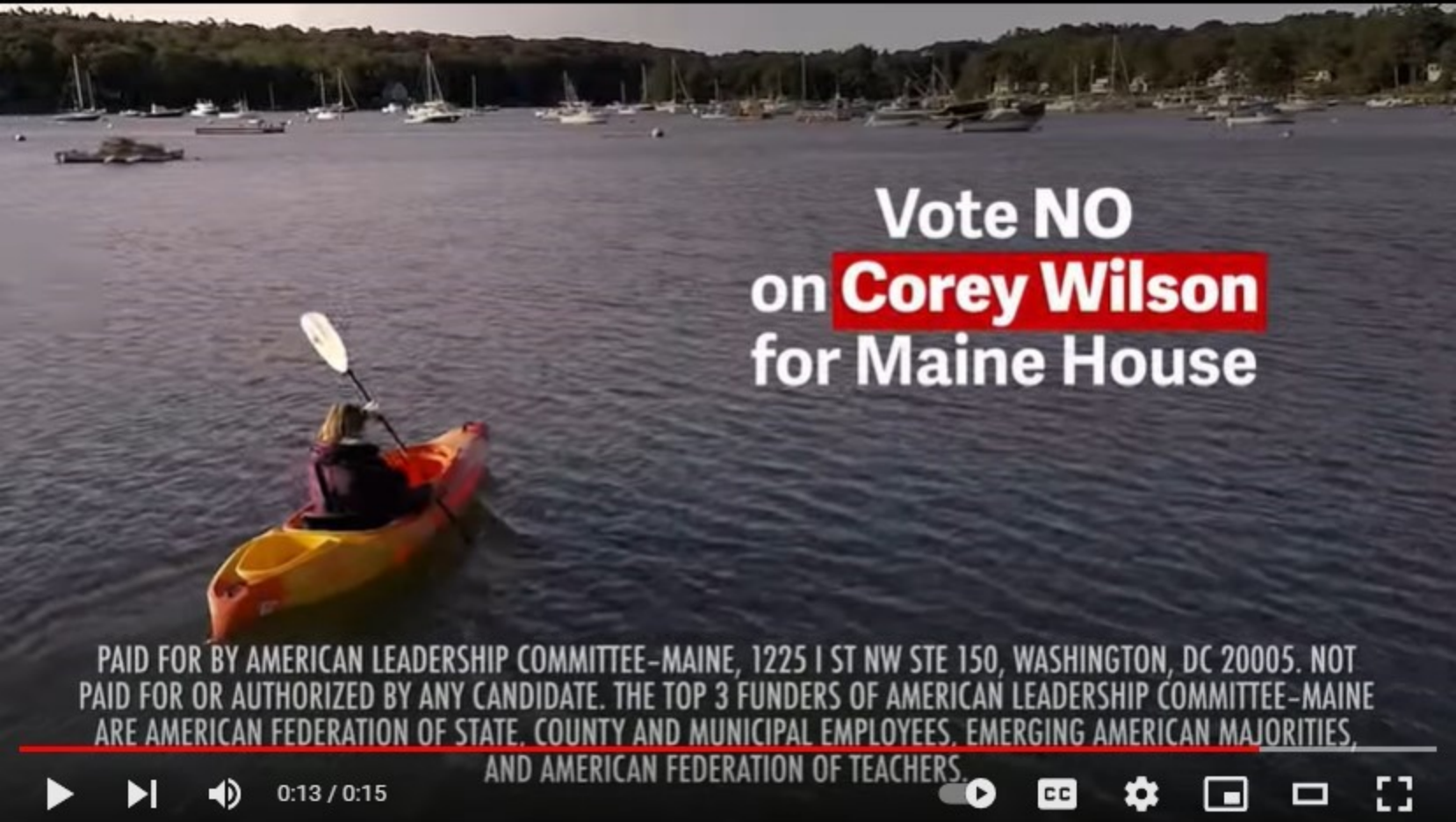
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|---------|-------------|------------|---------|----------------------------|--------|-------------------|--------|---------------|----------|---|---|------------|--------------|------------|
| | | \$4,650.00 | | | | Reagan Paul | Oppose | House | 37 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | | \$4,650.00 | | | | Crystal Robinson | Oppose | House | 44 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$4,650.00 | | | | Tricia Warren | Oppose | House | 48 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | | | | Kelly James | Oppose | House | 49 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$4,650.00 | | | | Linda Baker | Oppose | House | 51 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$4,650.00 | | | | Charles Bussell | Oppose | House | 54 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | | | | Phillip Wiseman | Oppose | House | 55 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$4,650.00 | | | | Corey Wilson | Oppose | House | 57 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$4,650.00 | | | | James Orr | Oppose | House | 59 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | | | | William Clardy | Oppose | House | 60 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | | | | Tiffany Estabrook | Oppose | House | 75 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |

American Leadership Committee - Maine

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|---------|-------------|------------|----------------------|----------------------------|--------|----------------|--------|---------------|----------|---|---|----------------------------------|--------------|------------|
| Product | Vendor Name | Amount | Purpose | Original Digital Drop Date | Amount | Candidate Name | Stance | Office Sought | District | Original Disclaimer | Updated Disclaimer | Facebook | Programmatic | YouTube |
| | | \$4,650.00 | Donna Dodge | Oppose | House | 83 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/29/2022 |
| | | \$4,650.00 | Gregory Foster | Oppose | House | 86 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | James Sorcek | Oppose | House | 88 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | Benjamin Weisner | Oppose | House | 89 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/31/2022 |
| | | \$4,650.00 | Jon Connor | Oppose | House | 96 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | David Reed | Oppose | House | 105 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | Barbara Bagshaw | Oppose | House | 106 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 10/30/2022 |
| | | \$4,650.00 | Michael Hall | Oppose | House | 107 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | \$4,650.00 | Pamela Buck | Oppose | House | 142 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 11/1/2022 |
| | | \$4,650.00 | Ann Marie Fredericks | Oppose | House | 143 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |
| | | \$4,650.00 | Timothy Roche | Oppose | House | 145 | | | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/28/2022 | 10/27/2022 | 11/1/2022 |

American Leadership Committee - Maine

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| | | | | | | | | | | | | Facebook | Programmatic | YouTube |
| | | | | | \$4,650.00 | Mark Rouillard | Oppose | House | 149 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | 10/29/2022 | 10/27/2022 | 11/1/2022 |



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American Leadership Committee - Maine

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| ME Mail Flight 1 | Moxie Media | \$5,448.44 | Direct Mail Postage | 10/13 | \$5,448.44 | | | | | |
| | | \$468.86 | | | John "Jake" Chambers | Oppose | House | 9 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$621.19 | | | Linda Baker | Oppose | House | 51 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$540.28 | | | Charles Bussell | Oppose | House | 54 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$527.62 | | | James Orr | Oppose | House | 59 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$521.75 | | | Tiffany Estabrook | Oppose | House | 75 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$544.35 | | | James Sorcek | Oppose | House | 88 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$558.81 | | | Jon Connor | Oppose | House | 96 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$506.83 | | | Pamela Buck | Oppose | House | 142 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$633.39 | | | Ann Marie Fredericks | Oppose | House | 143 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$525.36 | | | Mark Rouillard | Oppose | House | 149 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| ME Mail Flight 1 | Moxie Media | \$12,698.00 | Direct Mail Production | 10/13 | \$12,698.00 | | | | | |
| | | \$1,085.00 | | | John "Jake" Chambers | Oppose | House | 9 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$1,458.00 | | | Linda Baker | Oppose | House | 51 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$1,258.00 | | | Charles Bussell | Oppose | House | 54 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$1,228.00 | | | James Orr | Oppose | House | 59 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$1,213.00 | | | Tiffany Estabrook | Oppose | House | 75 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$1,268.00 | | | James Sorcek | Oppose | House | 88 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$1,304.00 | | | Jon Connor | Oppose | House | 96 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | \$1,177.00 | | | Pamela Buck | Oppose | House | 142 | | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |

American Leadership Committee - Maine

| Product | Vendor Name | Amount | Purpose | Date Mailed | Amount | Candidate Name | Stance | Office Sought | District | Disclaimer |
|------------------|-------------|------------|---------------------|-------------|-------------------|----------------------|--------|---------------|----------|---|
| | | | | | \$1,485.00 | Ann Marie Fredericks | Oppose | House | 143 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,222.00 | Mark Rouillard | Oppose | House | 149 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| ME Mail Flight 2 | Moxie Media | \$9,513.47 | Direct Mail Postage | 10/19 | \$9,513.47 | | | | | |
| | | | | | \$309.59 | John "Jake" Chambers | Oppose | House | 9 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$322.89 | Jennifer Morin | Oppose | House | 20 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$350.92 | Reagan Paul | Oppose | House | 37 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$371.15 | Crystal Robinson | Oppose | House | 44 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$497.16 | Tricia Warren | Oppose | House | 48 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$457.27 | Kelly James | Oppose | House | 49 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$407.57 | Linda Baker | Oppose | House | 51 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$355.26 | Charles Bussell | Oppose | House | 54 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$428.66 | Phillip Wiseman | Oppose | House | 55 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$405.83 | Corey Wilson | Oppose | House | 57 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$347.16 | James Orr | Oppose | House | 59 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$352.08 | William Clardy | Oppose | House | 60 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$343.41 | Tiffany Estabrook | Oppose | House | 75 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$411.61 | Donna Dodge | Oppose | House | 83 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$402.94 | Gregory Foster | Oppose | House | 86 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$357.86 | James Sorcek | Oppose | House | 88 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$324.62 | Benjamin Weisner | Oppose | House | 89 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |

American Leadership Committee - Maine

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| | | | | | \$367.11 | Jon Connor | Oppose | House | 96 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$430.97 | David Reed | Oppose | House | 105 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$372.61 | Barbara Bagshaw | Oppose | House | 106 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$372.31 | Michael Hall | Oppose | House | 107 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$333.87 | Pamela Buck | Oppose | House | 142 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$414.79 | Ann Marie Fredericks | Oppose | House | 143 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$430.11 | Timothy Roche | Oppose | House | 145 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$345.72 | Mark Rouillard | Oppose | House | 149 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| ME Mail Flight 2 | Moxie Media | \$28,984.00 | Direct Mail Production | 10/19 | \$28,984.00 | | | | | |
| | | | | | \$970.00 | John "Jake" Chambers | Oppose | House | 9 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$970.00 | Jennifer Morin | Oppose | House | 20 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,061.00 | Reagan Paul | Oppose | House | 37 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,127.00 | Crystal Robinson | Oppose | House | 44 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,537.00 | Tricia Warren | Oppose | House | 48 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,407.00 | Kelly James | Oppose | House | 49 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,246.00 | Linda Baker | Oppose | House | 51 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,075.00 | Charles Bussell | Oppose | House | 54 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,314.00 | Phillip Wiseman | Oppose | House | 55 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,240.00 | Corey Wilson | Oppose | House | 57 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,049.00 | James Orr | Oppose | House | 59 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |

American Leadership Committee - Maine

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| | | | | | \$1,065.00 | William Clardy | Oppose | House | 60 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,037.00 | Tiffany Estabrook | Oppose | House | 75 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,259.00 | Donna Dodge | Oppose | House | 83 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,230.00 | Gregory Foster | Oppose | House | 86 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,084.00 | James Sorcek | Oppose | House | 88 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$976.00 | Benjamin Weisner | Oppose | House | 89 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,114.00 | Jon Connor | Oppose | House | 96 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,322.00 | David Reed | Oppose | House | 105 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,132.00 | Barbara Bagshaw | Oppose | House | 106 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,131.00 | Michael Hall | Oppose | House | 107 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,006.00 | Pamela Buck | Oppose | House | 142 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,269.00 | Ann Marie Fredericks | Oppose | House | 143 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,319.00 | Timothy Roche | Oppose | House | 145 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,044.00 | Mark Rouillard | Oppose | House | 149 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| ME Mail Flight 3 | Moxie Media | \$3,835.36 | Direct Mail Postage | 10/21 | \$3,835.36 | | | | | |
| | | | | | \$351.31 | John "Jake" Chambers | Oppose | House | 9 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$416.40 | Linda Baker | Oppose | House | 51 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$366.58 | Charles Bussell | Oppose | House | 54 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$390.74 | James Orr | Oppose | House | 59 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$396.68 | Tiffany Estabrook | Oppose | House | 75 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |

American Leadership Committee - Maine

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| | | | | | \$346.22 | James Sorcek | Oppose | House | 88 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$338.38 | Jon Connor | Oppose | House | 96 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$383.32 | Pamela Buck | Oppose | House | 142 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$428.27 | Ann Marie Fredericks | Oppose | House | 143 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$417.46 | Mark Rouillard | Oppose | House | 149 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| ME Mail Flight 3 | Moxie Media | \$14,050.00 | Direct Mail Production | 10/21 | \$14,050.00 | | | | | |
| | | | | | \$1,276.00 | John "Jake" Chambers | Oppose | House | 9 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,537.00 | Linda Baker | Oppose | House | 51 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,337.00 | Charles Bussell | Oppose | House | 54 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,434.00 | James Orr | Oppose | House | 59 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,458.00 | Tiffany Estabrook | Oppose | House | 75 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,255.00 | James Sorcek | Oppose | House | 88 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,224.00 | Jon Connor | Oppose | House | 96 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,404.00 | Pamela Buck | Oppose | House | 142 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,584.00 | Ann Marie Fredericks | Oppose | House | 143 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| | | | | | \$1,541.00 | Mark Rouillard | Oppose | House | 149 | Paid for by American Leadership Committee - Maine, 1225 I St NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors. |
| ME Mail Flight 5 | Moxie Media | \$8,262.65 | Direct Mail Postage | 11/1 | \$8,262.65 | | | | | |
| | | | | | \$339.99 | Phillip Wiseman | Oppose | House | 55 | Paid for by American Leadership Committee—Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee—Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | | | | \$282.20 | Jon Connor | Oppose | House | 96 | Paid for by American Leadership Committee—Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee—Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |

American Leadership Committee - Maine

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| | | \$292.69 | John "Jake" Chambers | Oppose | House | 9 | | | | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$334.66 | Gregory Foster | Oppose | House | 86 | | | | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$305.76 | Jennifer Morin | Oppose | House | 20 | | | | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$332.42 | Barbara Bagshaw | Oppose | House | 106 | | | | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$339.13 | Corey Wilson | Oppose | House | 57 | | | | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$367.34 | David Reed | Oppose | House | 105 | | | | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$407.59 | Tricia Warren | Oppose | House | 48 | | | | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$371.12 | Timothy Roche | Oppose | House | 145 | | | | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$301.64 | Crystal Robinson | Oppose | House | 44 | | | | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$346.36 | Mark Rouillard | Oppose | House | 149 | | | | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$318.66 | Pamela Buck | Oppose | House | 142 | | | | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |

American Leadership Committee - Maine

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| | | \$345.50 | | | | Linda Baker | Oppose | House | 51 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$359.43 | | | | Donna Dodge | Oppose | House | 83 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$331.39 | | | | Michael Hall | Oppose | House | 107 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$329.50 | | | | Tiffany Estabrook | Oppose | House | 75 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$317.63 | | | | Reagan Paul | Oppose | House | 37 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$305.08 | | | | Charles Bussell | Oppose | House | 54 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$324.68 | | | | James Orr | Oppose | House | 59 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$315.91 | | | | William Clardy | Oppose | House | 60 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$305.76 | | | | Benjamin Weisner | Oppose | House | 89 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$355.13 | | | | Ann Marie Fredericks | Oppose | House | 143 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$288.56 | | | | James Sorcek | Oppose | House | 88 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |

American Leadership Committee - Maine

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| ME Mail Flight 5 | Moxie Media | \$34,362.00 | Direct Mail Production | 11/1 | \$344.52 | Kelly James | Oppose | House | 49 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | |
| | | | | | \$34,362.00 | | | | | | | |
| | | | | | \$1,421.00 | Phillip Wiseman | Oppose | House | 55 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | |
| | | | | | \$1,152.00 | Jon Connor | Oppose | House | 96 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | |
| | | | | | \$1,201.00 | John "Jake" Chambers | Oppose | House | 9 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | |
| | | | | | \$1,396.00 | Gregory Foster | Oppose | House | 86 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | |
| | | | | | \$1,262.00 | Jennifer Morin | Oppose | House | 20 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | |
| | | | | | \$1,386.00 | Barbara Bagshaw | Oppose | House | 106 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | |
| | | | | | \$1,417.00 | Corey Wilson | Oppose | House | 57 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | |
| | | | | | \$1,548.00 | David Reed | Oppose | House | 105 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | |
| \$1,735.00 | Tricia Warren | Oppose | House | 48 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | | | | | | |
| \$1,566.00 | Timothy Roche | Oppose | House | 145 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. | | | | | | | |

American Leadership Committee - Maine

| Product | Vendor Name | Amount | Purpose | Date Mailed | Amount | Candidate Name | Stance | Office Sought | District | Disclaimer |
|---------|-------------|------------|-------------------|-------------|--------|----------------|--------|---------------|----------|---|
| | | \$1,242.00 | Crystal Robinson | | | Oppose | House | | 44 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,450.00 | Mark Rouillard | | | Oppose | House | | 149 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,322.00 | Pamela Buck | | | Oppose | House | | 142 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,446.00 | Linda Baker | | | Oppose | House | | 51 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,511.00 | Donna Dodge | | | Oppose | House | | 83 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,381.00 | Michael Hall | | | Oppose | House | | 107 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,372.00 | Tiffany Estabrook | | | Oppose | House | | 75 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,317.00 | Reagan Paul | | | Oppose | House | | 37 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,258.00 | Charles Bussell | | | Oppose | House | | 54 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,350.00 | James Orr | | | Oppose | House | | 59 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,309.00 | William Clardy | | | Oppose | House | | 60 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |

American Leadership Committee - Maine

| Product | Vendor Name | Amount | Purpose | Date Mailed | Amount | Candidate Name | Stance | Office Sought | District | Disclaimer |
|---------|-------------|------------|---------|-------------|--------|----------------------|--------|---------------|----------|---|
| | | \$1,262.00 | | | | Benjamin Weisner | Oppose | House | 89 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,322.00 | | | | Ann Marie Fredericks | Oppose | House | 143 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,182.00 | | | | James Sorcek | Oppose | House | 88 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |
| | | \$1,554.00 | | | | Kelly James | Oppose | House | 49 | Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers. |



Samantha Del Vecchio [REDACTED]

Fwd: Invoice 3073 from Moxie Media Inc

4 messages

Cory Warfield [REDACTED]
To: Samantha Del Vecchio [REDACTED]

Sat, Oct 8, 2022 at 3:37 PM

----- Forwarded message -----
From: Moxie Media, Inc. <[REDACTED]>
Date: Sat, Oct 8, 2022 at 12:34
Subject: Invoice 3073 from Moxie Media Inc
To: <[REDACTED]>, <[REDACTED]>

INVOICE 3073



Moxie Media, Inc.

\$18,146.44

Print or save

Powered by QuickBooks

Hello,

Here is the invoice for the first set of Maine HD mail pieces we are doing for you.

These are scheduled to drop on 10/13.

Thanks,

ETH:95

Henry

Moxie Media, Inc.

PO Box 30084 Seattle, WA 98113

206.604.5121 [REDACTED]

If you receive an email that seems fraudulent, please check with the business owner before paying.



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--

Cory Warfield (He/Him)

IE Director

Email: [REDACTED]



www.dlcc.org | [Facebook](#) | [Twitter](#) | [Instagram](#)

Invoice_3073_from_Moxie_Media_Inc.pdf
40K

Cory Warfield <[REDACTED]> Mon, Oct 10, 2022 at 10:41 AM
To: DLCC Billing <[REDACTED]>, Samantha Del Vecchio <[REDACTED]>, Meghan Lyons <[REDACTED]>

Approved for payment on 10/11.

Let me know if you have any questions.

[Quoted text hidden]

Invoice_3073_from_Moxie_Media_Inc.pdf
40K

DLCC Billing <[REDACTED]> Mon, Oct 10, 2022 at 2:07 PM
To: Cory Warfield <[REDACTED]>
Cc: Samantha Del Vecchio <[REDACTED]>, Meghan Lyons <[REDACTED]>

Can we get candidate info and support/oppose info for these please? Thank you!

[Quoted text hidden]

ETH:96

 Invoice_3073_from_Moxie_Media_Inc.pdf
40K

Samantha Del Vecchio

Mon, Oct 10, 2022 at 2:16 PM

To: "Moxie Media, Inc."

Cc: Cory Warfield <>, DLCC Billing

Hi Henry,

Could we get this invoice with the candidate names and if it was supporting or opposing for each of the districts in the itemization? This piece is:

John "Jake" Chambers (HD_9) (Oppose)
Linda Baker (HD_51) (Oppose)
Charles Bussell (HD_54) (Oppose)
James Orr (HD_59) (Oppose)
Tiffany Eastbrook (HD_75) (Oppose)
James Sorcek (HD_88) (Oppose)
Jon Connor (HD_96) (Oppose)
Pamela Buck (HD_142) (Oppose)
Ann Marie Fredericks (HD_143) (Oppose)
Mark Rouillard (HD_149) (Oppose)

Thanks!
Samantha

[Quoted text hidden]



Samantha Del Vecchio <[redacted]>

Invoice 3073 from Moxie Media Inc

1 message

Moxie Media, Inc. [redacted]
To: [redacted]

Mon, Oct 10, 2022 at 3:20 PM

INVOICE 3073



Moxie Media, Inc.

\$18,146.44

Print or save

Powered by QuickBooks

Here is that revised invoice.

Moxie Media, Inc.

PO Box 30084 Seattle, WA 98113

206.604.5121 [redacted]

If you receive an email that seems fraudulent, please check with the business owner before paying.



ETH:98

 **Invoice_3073_from_Moxie_Media_Inc.pdf**
40K

Moxie Media, Inc.
PO Box 30084
Seattle, WA 98113
206.604.5121

Invoice



BILL TO

American Leadership Committee -
Maine
1227 I St NW, Ste. 1250
Washington, DC 20005

| INVOICE # | DATE | TOTAL DUE | | ENCLOSED |
|-----------|------------|-------------|--|----------|
| 3073 | 10/08/2022 | \$18,146.44 | | |

| DESCRIPTION | AMOUNT |
|--|----------|
| 10/08/2022 | |
| Professional services and coordination of ALC ME #1 (8.5" x 11" , 4 color cards) to the following 10 Maine Districts | |
| HD 9 - 986HH (oppose Chambers) | 1,085.00 |
| Postage HD 9 | 445.67 |
| HD 51 - 1,325HH (Oppose Baker) | 1,458.00 |
| Postage District 51 | 598.90 |
| HD 54 - 1,144HH (Oppose Bussell) | 1,258.00 |
| Postage for HD 54 | 517.09 |
| HD 59 - 1,116HH (Oppose Orr) | 1,228.00 |
| postage for HD 59 | 504.43 |
| HD 75 - 1,103 (oppose Estabrook) | 1,213.00 |
| postage for 75 | 498.56 |
| HD 88- 1,153HH (oppose Sorcek) | 1,268.00 |
| postage for HD 88 | 521.16 |
| HD 96 - 1,185 (oppose Connor) | 1,304.00 |
| postage for HD 96 | 535.62 |
| HD 142 - 1,070 (oppose Buck) | 1,177.00 |
| Postage for HD 142 | 483.64 |
| HD 143 - 1,350 (oppose Fredericks) | 1,485.00 |
| Postage for HD 143 | 610.20 |
| HD 149 - 1,111HH (oppose Rouillard) | 1,222.00 |

| DESCRIPTION | AMOUNT |
|-----------------------------------|--------|
| Postage for HD 149 | 502.17 |
| Drop ship to Portland and Hampden | 231.00 |

BALANCE DUE

\$18,146.44

From: [Ashley Quenneville](#)
To: [Emily Hogin](#)
Subject: Fwd: DLCC ME IE Mail Piece #1
Date: Wednesday, November 16, 2022 11:36:41 AM

----- Forwarded message -----

From: Ashley Quenneville <[REDACTED]>
Date: Tue, Oct 4, 2022 at 12:07 PM
Subject: Re: DLCC ME IE Mail Piece #1
To: Khalid Naji <[REDACTED]>
Cc: Eli Presberg <[REDACTED]>, Brian Zuzenak <[REDACTED]>, Emma Tupper <[REDACTED]>

No additional edits, these are approved! Thank you!

On Tue, Oct 4, 2022 at 9:58 AM Khalid Naji <[REDACTED]> wrote:

Hi Ashley,

Wanted to follow up and see if there were any additional edits for legal. I also attached the versions below for your review as well.

Let me know if you need anything else.

On Wed, Sep 28, 2022 at 10:31 AM Khalid Naji <[REDACTED]> wrote:

Thanks, Ashley!

I'll get started on your edits now and will wait to hear back from legal if there are any additional changes.

On Wed, Sep 28, 2022 at 10:15 AM Ashley Quenneville <[REDACTED]> wrote:

Hi Eli,

This looks great! A couple edits:

- Can we remove some of the "extreme" language? Remove from "extreme Republican John Chambers" and "keep extremists like John Chambers out of our state legislature"
- Can we add "even here in Maine" to the first paragraph on the back?

Still waiting on legal edits which I should have today, once I have them I'll send them through.

Thanks,

Ashley

On Fri, Sep 23, 2022 at 12:06 PM Eli Presberg <[REDACTED]> wrote:

Hi Ashley,

Let me know who else I should be adding to these threads moving forward.

We're excited to share the creative for the first flight of mail with you. This piece is an 8.5x11 card with a common front and unique backs. This piece is meant to make clear the urgency of the threat to abortion rights in Maine, and the importance of the State House race specifically.

Please view at 100% magnification for most accurate colors, and note that images may appear fuzzy for now to keep the file size small.

All versions of this piece are scheduled to be finalized for print by Wednesday, 10/5 in order to drop to USPS on 10/12. Once we have approval on the initial design, we will build out a unique version for each race for research and legal review. **Please share compiled initial feedback in one email to us by EoD Monday, 9/26 to stay on track.** Really looking forward to your thoughts.



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STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES

RE: American Leadership Committee – Maine

DECLARATION OF CORY WARFIELD

1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein.
2. I am the Independent Expenditure Director for the Democratic Legislative Campaign Committee (“DLCC”).
3. In my capacity as Independent Expenditure Director, I oversee the expenditures of American Leadership Committee (“ALC”), the independent expenditure arm of the DLCC.
4. As Independent Expenditure Director, I oversee ALC’s independent expenditures, including digital and mail communications paid for by American Leadership Committee–Maine (“ALC-ME.”).
5. Exhibit D lists all of ALC-ME’s independent expenditures for mailers to date and the disclaimer that appeared on each communication.
6. Exhibit B lists all of ALC-ME’s independent expenditures for digital ads, the disclaimer that originally appeared on the ad, the updated disclaimer, and the date the updated disclaimer appeared on Programmatic Digital Programming, Facebook, or YouTube.
7. The last communications that ALC-ME paid to distribute by mail or online with the “no top donors” disclaimer were sent or uploaded on October 21.
8. Mail Flight 4 was printed with the “no top donors” disclaimer on October 24. The original plan was to send Mail Flight 4 on October 26, but ALC-ME instructed its mail vendor not

to send Mail Flight 4 until after the conclusion of the October 26 Maine Ethics Commission Hearing.

9. Mail Flight 4 cost \$20,926.99 for production and design with an estimated additional \$1,500 for printing.

10. Mail Flight 5 was originally planned to be printed on October 26 but was placed on hold until after the Commission hearing on October 26.

11. Upon receiving guidance as to which donors to include in the ALC-ME disclaimers on October 26, ALC-ME contacted the compliance team at the DLCC for the top donors to list in its disclaimer.

12. ALC-ME decided not to send Mail Flight 4.

13. Mail Flight 5 was printed with the following disclaimer: “Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers.” Exhibit A is a sample of a mailer from Mail Flight 5.

14. Mail Flight 5 was sent on November 1. Its recipients included every voter who received a previous mailer from ALC-ME with the “no top donors” disclaimer.

15. On October 27, ALC-ME instructed its digital vendors to replace digital ads running with ads containing the new disclaimer, “Paid for by American Leadership Committee–Maine, 1225 I ST NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee–Maine are American Federation of State, County and Municipal Employees, Emerging American

Majorities, and American Federation of Teachers.” Exhibit C is a sample of a digital video with the updated disclaimer that was uploaded to YouTube on October 27, 2022, for distribution through digital advertising.

16. Digital ads were running on three platforms: Programmatic (i.e., Hulu), Facebook, and YouTube. Each platform has different internal processes that affect the speed with which changes can be reflected on digital ads. For example, the ad uploaded in Exhibit C had gone through YouTube’s review process and was played for voters beginning October 29, 2022.

17. Digital ads were pre-purchased from the applicable platform and “spent down” each day by the platform. Neither ALC-ME nor its digital vendor made an affirmative purchase of a digital ad after October 21 with the “no top donors” disclaimer.


18. All Programmatic ads were running the corrected disclaimer on October 27.

19. Facebook ads are subject to an internal review by Facebook that delays updates to ads. Facebook was running ads with the corrected disclaimer in some districts on October 28 and in all districts by October 29.

20. YouTube has an unpublished daily upload limit. Once the limit is reached, ALC-ME cannot upload any more videos that day and must wait until the next day, including to update disclaimers on digital ads already running. YouTube was running the corrected disclaimer in some districts on October 29, with more districts added until all districts had the correct disclaimer on November 1.

I declare under penalty of perjury under the laws of the State of Maine that the foregoing is true and correct.

Executed on: 11/16/2022
Date


Cory Warfield

William Clardy
Candidate, Maine House
District 60
13 Maple Street , Apt 1
Augusta, ME 04330

(207) 242-7248

04 NOV 2022

Jonathan Wayne
Maine Commission on Governmental Ethics and
Election Practices
135 SHS
Augusta, ME 04333

Mr. Wayne,

I wish to reiterate, lest it be forgotten in the shuffle, that this was not some random stray mailer gone awry, this was a premeditated and well-funded ad campaign, initiated in a way that deliberately minimized prior warning and minimized the Commission's ability to respond before the election was a *fait accompli*.

Mine was only one of several races targeted by the Democratic Legislative Campaign Committee. Nor was my race one of the most heavily targeted. But the American Leadership Committee – Maine, a P.A.C. wholly controlled and funded by the D.L.C.C. (their words, not mine), single-handedly outspent my entire campaign budget churning out mass-produced opposition ads with no regards for accuracy, not even in their legal disclaimers. “No top donors” is a bald-faced lie if you have any donors, much less a single donor playing word games with their bank accounts. I am sure that their ads supporting my opponent, while less hostile, were equally disingenuous in their disclaimers. And the dollars spent in support of my opponent were at least equal to those spent opposing me. The civility in tone Mr. Bridgeo and I had maintained was effectively out-advertised by ALC's last-minute spending spree.

Multiply that by the number of races they chose to intervene in, and you have a coarse measure of the damage wrought in Maine's legislative races.

While I normally preach presuming good intentions on the part of my opponents, especially when the other side promises to correct their mistake(s) immediately. That presumption was shredded the day after hearing, when I started hearing reports from other candidates that the ALC digital ads were continuing to run, unchanged. It was further shredded when I saw that ALC -Maine's filing showing that they decided to make one last spending spree the day after their attorney had solemnly promised compliance.

Given Speaker Fecteau's membership on D.L.C.C.'s Board of Directors and Maine being 1 of only 20 states targeted by the D.L.C.C., it's hard to perceive their entire involvement in Maine as anything less than a deliberate hit-and-run campaign, thumbing their nose at the Commission's decisions on their way out.

Not only do I believe that their actions have earned the steepest of penalties, I also believe that the Commission should anticipate that D.L.C.C. may try to evade penalties by withholding additional funding from their "independent expenditure arm," leaving ALC - Maine twisting in the wind. If they are audacious enough to attempt that, I would urge the Commission to use the D.L.C.C.'s own portrayal of ALC -Maine as "wholly controlled and funded" by the D.L.C.C. to hold D.L.C.C. corporately liable for ALC - Maine's penalties.

Because D.L.C.C. chose to come to Maine and deliberately ignore our election laws, the Commission should show them no mercy in holding them accountable.

Sincerely,

A handwritten signature in blue ink that reads "William Clardy". The signature is written in a cursive style with a large, sweeping initial "W".

William Clardy

Candidate for State Representative,
District 60 (Eastern Augusta)

Kim E. Pettengill
171 Northern Avenue
Farmingdale, Maine 04344
207.907.8205 kimepettengill@gmail.com

November 4, 2022

Jonathan Wayne, Executive Director
Maine Ethics Commission
135 State House Station
Augusta, Maine 04333-0135

Dear Jonathan -

Thank you for affording me the opportunity to submit additional information regarding my complaint against American Leadership Committee - Maine.

First, I would like to add that Donna Marie Dodge (District 83) has had two mailers in opposition from the ALC and should have been included in my original complaint.

The ALC has filed three reports showing expenditure of funds for video ads against all of the Republican candidates listed on my initial letter as well as Ms. Dodge.

I am including three samples of YouTube videos that have run since the hearing on October 26th and one mailer:

- Video in opposition of Corey Wilson with incorrect disclaimer ran on 10/29 at approximately 3:30 PM
- Video in opposition of Corey Wilson with updated disclaimer ran on 11/3 at approximately 12:00 PM
- Video in support of Tavis Hasenfus with incorrect disclaimer ran on 11/3 at approximately 12:16 PM
- Mailer in opposition to William Clardy with updated disclaimer delivered on 11/4

At the hearing, Counsel for the ALC was told that they would have an opportunity to work with the Ethics staff. Jonathan also gave the appropriate language to use for disclaimers. I understood that the disclaimer should read “paid for by the Democratic Legislative Campaign Committee who’s top three donors are...”

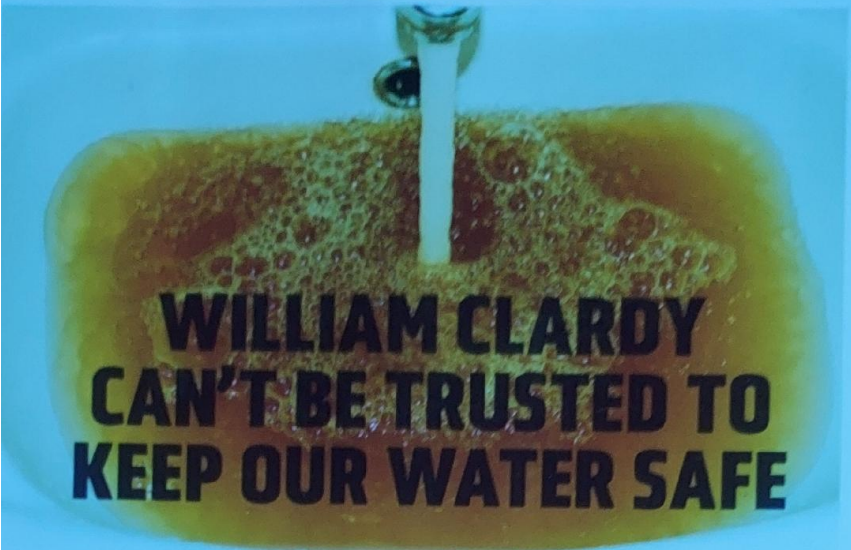
In reading all of the reports filed by the ALC, the only donor listed is the Democratic Legislative Campaign Committee, not American Federation of State, County and Municipal Employees; Emerging American Majorities; and American Federation of Teachers.

I am not technologically proficient but have been told that halting video ads is simply a matter of pausing the current ad, amending it and then re-submitting it to the appropriate outlet. Yet the ALC continued running these ads at least through October 29th.

When deciding the penalty for the American Leadership Committee - Maine, I hope that you will take into account that they did not change the disclaimer in support of their candidates and while changing the disclaimer in opposition to Republican candidates, they did not use the wording as was explained on October 26th.

Sincerely,

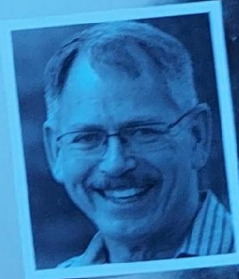
Kim E. Pettengill



WILLIAM CLARDY CAN'T BE TRUSTED TO KEEP OUR WATER SAFE

Our representatives should prioritize our health, not the agenda of special interests who want to roll back basic environmental protections.

William Clardy is backed by dangerous extremists who want to roll back basic clean water protections and **allow so-called forever chemicals called PFAS to stay in our water forever, leading to cancer, birth defects, and immune system problems.**¹



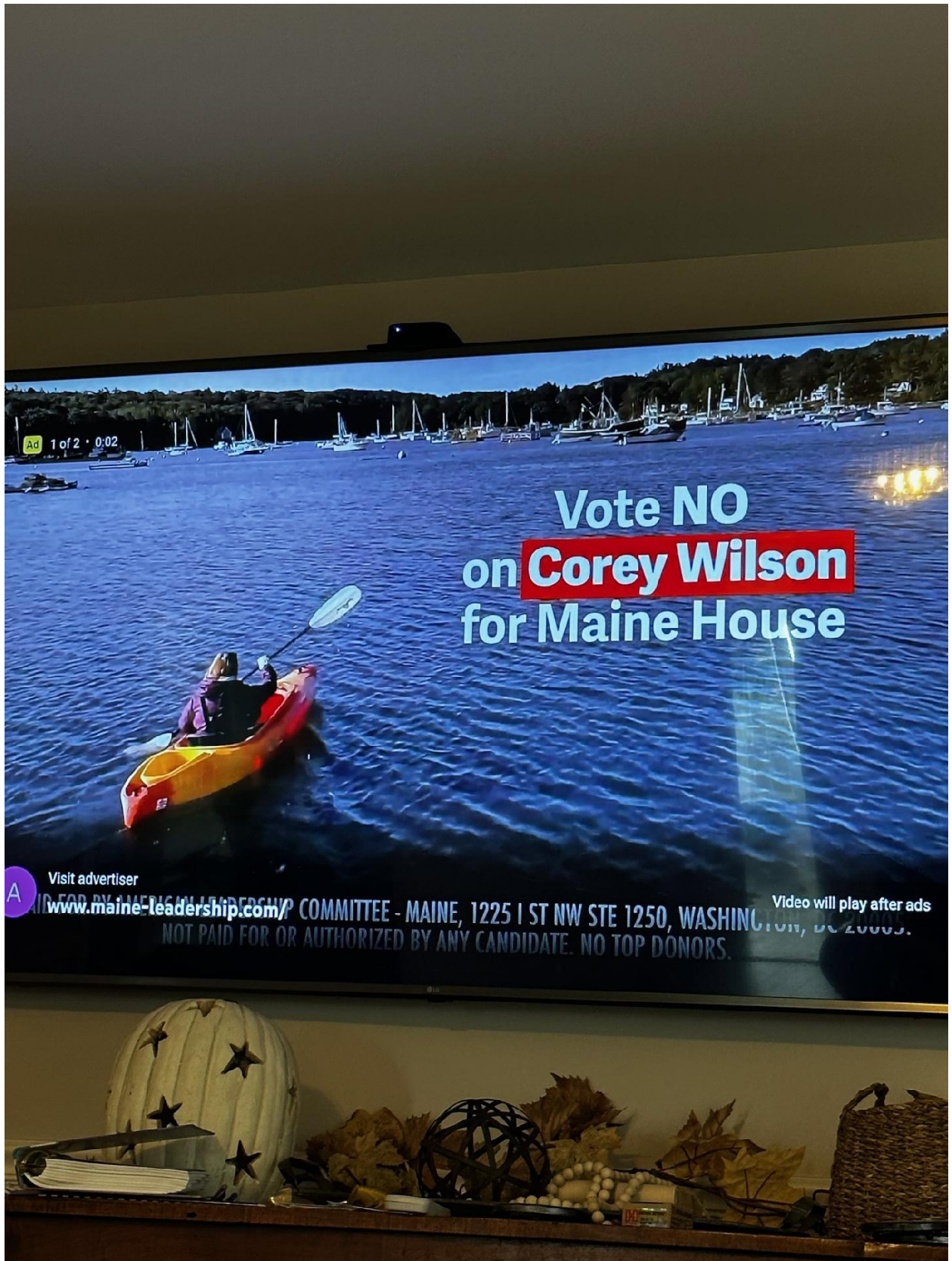
VOTE BY NOV 8 PROTECT OUR DRINKING WATER FROM WILLIAM CLARDY

CHECK THE FACTS: 1) Maine Republican Party Platform, accessed 10/4/22

Paid for by American Leadership Committee—Maine, 1225 I ST. NW Ste 150, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. The top 3 funders of American Leadership Committee—Maine are American Federation of State, County and Municipal Employees, Emerging American Majorities, and American Federation of Teachers.

*****AUTO**5-DIGIT 04330
T34 P1 C016 0002A 1 21253
LINDA A HADLEY ROOD
OR CURRENT RESIDENT
110 CONY ST # 2

PERMIT NO 268
BROCKTON MA
PAID
US POSTAGE
PERMIT NO 268



Ad 1 of 2 0:02

Vote NO on **Corey Wilson** for Maine House

A

Visit advertiser

www.maine-leadership.com


COMMITTEE - MAINE, 1225 I ST NW STE 1250, WASHINGTON, DC 20005.
NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. NO TOP DONORS.

Video will play after ads



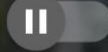
Vote NO
on **Corey Wilson**
for Maine House

A ... FOR BY AMERICAN LEADERSHIP COMMITTEE-MAINE, 1225 I ST NW STE 150, WASHINGTON, DC 20005
... OR OR AUTHORIZED BY ANY CANDIDATE. THE TOP 3 FUNDERS OF AMERICAN LEADERSHIP COMMITTEE-
... ARE AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL EMPLOYEES, EMERGING AMERICAN MAJORITIES,
AND AMERICAN FEDERATION OF TEACHERS.



Ad - 10/2/02 ©

12:15



**TO PROTECT
REPRODUCTIVE FREEDOM**
**I trust Tavis Hasenfus
for Maine House**

0:15 / 0:15

AMERICAN LEADERSHIP COMMITTEE - MAINE, 1225 I ST NW STE 1250, WASHINGTON, DC 20005. []
NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. NO TOP DONORS

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

October 28, 2022

By Email and Regular Mail

Jonathan S. Berkon, Esq.
Elias Law Group LLP
10 G Street NE, Suite 600
Washington, DC 20002

Dear Mr. Berkon,

At its meeting on October 26, 2022, the Maine Ethics Commission (“Commission”) considered complaints filed by Mary Small and Kim Pettengill concerning the lack of a specific top three funder disclosure statement in independent expenditure communications by the American Leadership Committee-Maine PAC (“ALC-ME”). The Commission also considered whether an October 14, 2022 independent expenditure (“IE”) report by ALC-ME was filed on time. As discussed below, the Commission determined that ALC-ME violated the top 3 funder disclosure and IE reporting requirements.

At the Commission’s next scheduled meeting on November 30, 2022, the Commission will consider what civil penalties, if any, should be assessed for the violations. This letter is to invite additional comments and information by November 16, 2022 to assist the Commission in reaching those penalty determinations. The Commission also requests that Heather Kashner participate in the meeting to respond to any factual questions that the Commission may have.

Top Three Funder Disclosure Requirement

Finding of violation. Under 21-A M.R.S. § 1014(2-B), when a political committee makes an independent expenditure, the communication is required to include a statement of the three sources that provided the highest aggregate amount of funding to the political committee since the most recent general election. If a political action committee making an IE is fully funded or controlled by another PAC or legal entity, the communication must disclose the top three funders of the entity that fully funds or controls the PAC. 94-270 C.M.R. Ch. 1 § 7(12)(D). This provision is pertinent because ALC-ME is fully funded by the Democratic Leadership Campaign Committee (“DLCC”).

Ms. Small's complaint alleged that mailings disclosed by ALC-ME in an October 14, 2022 IE report lacked the top 3 funder disclosure statement required by 21-A M.R.S. § 1014(2-B). Ms. Pettengill's complaint expanded the scope of the communications at issue to include mailings and online ads disclosed in later IE reports. The complainants provided sample communications containing the statement "No top donors" rather than an identification of any funders by name.

At the Commission's October 26, 2022 meeting, it considered the factual information and legal arguments provided by ALC-ME concerning the top 3 funder requirement. The Commission determined unanimously that ALC-ME violated 21-A M.R.S § 1014(2-B) and Chapter 1, § 7(12)(D) of the Commission's rules by not including a top 3 funder disclosure statement required by those provisions.

Request for information. The Commission is authorized by 21-A M.R.S § 1014(4) to assess penalties for violations of § 1014. The maximum penalty is the amount of the expenditure that was in violation. As of today, the ALC-ME has filed IE reports totaling \$348,529.

Your client is invited to provide any argument or information it would like concerning what penalties should be assessed, if any. The Commission asks that ALC-ME's response include answers to the following questions:

- Is there any reason that the DLCC attributed the costs of IEs in Maine to donors under \$1,000 other than shielding donor names from public disclosure, as has been alleged?
- What is the total number of mail pieces disseminated in Maine that were disclosed in the IE Reports filed on October 14, 19, and 23, 2022?
- What remedial efforts has ALC-ME made regarding top 3 funder disclosures since the Commission's October 26, 2022 meeting?

Timeliness of IE Report

Finding of violation. Under 21-A M.R.S § 1019-B(4)(A) and Chapter 1, § 10(3)(B)(2) of the Commission's rules, whenever an IE of more than \$250 per candidate is made "[f]rom the 60th day through the 14th day before an election, a report must be filed within two calendar days of the expenditure." The term "expenditure" is defined in Maine Election Law to include "a purchase, payment, distribution, loan, advance, deposit or gift of money or anything of value made for the purpose of initiating or influencing a campaign" and "a contract, promise or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure [to initiate or influence a campaign]." 21-A M.R.S. §§ 1052(4)(A)(1)&(2). Under the Commission's rules, an expenditure includes "the placement of an order" for campaign goods or services, the "acceptance of the delivery of a good or the performance of a service by a vendor,"

Jonathan S. Berkon, Esq.

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October 28, 2022

or a “promise or an agreement (including an implied one) that a payment will be made in exchange for a good or service.” 94-270 C.M.R. Ch. 1, § 7(3).

On October 14, 2022, ALC-ME filed an IE Report for an expenditure of \$18,146.44 for direct mail. The date of the expenditure listed in the report was October 12, 2022. The Commission determined at its October 26, 2022 meeting that ALC-ME violated 21-A M.R.S. § 1019-B(4) by not filing a timely IE report.

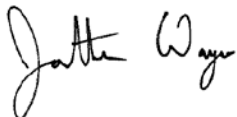
When an independent expenditure report is filed late, the Commission engages in penalty procedures set out in 21-A M.R.S. § 1020-A, which involves calculating a preliminary penalty and providing the late filer with an opportunity to ask for a waiver. Under the statutory formula in § 1020-A(4), the preliminary penalty for the October 14, 2022 IE report would be \$362.93 per day late. Based on the description on page 5 of your October 24, 2022 letter, the view of the Commission staff is that the date of the \$18,146.44 expenditure was *on or before* October 10. We believe additional information would assist the Commission in determining the date more precisely.

Your client is invited to provide any argument or information it would like concerning what penalties, if any, should be assessed for the late filing violation. The Commission asks that ALC-ME’s response include the following:

- a fuller written description of the initiation of the mailing that explains how and when ALC-ME received a cost estimate for the printing, and how and when Moxie Media and/or Standard Modern received direction to begin printing the mailings,
- all invoices or written estimates for the design, printing or distribution of the mailings, along with any emails or text messages by which they were transmitted, and
- any written communications reflecting any consideration by ALC-ME of cutting back on the mailings or uncertainty concerning the scope of the mailings.

Thank you for your cooperation with this request. Please let me know if you have any questions.

Sincerely,

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

Jonathan Wayne
Executive Director

cc: Emily A. Hogin, Esq. (by email)

ETH:118

[21-A M.R.S. § 1014](#)

§ 1014. Publication or distribution of political communications

1. Authorized by candidate. Whenever a person makes an expenditure to finance a communication expressly advocating the election or defeat of a clearly identified candidate through broadcasting stations, cable television systems, newspapers, magazines, campaign signs or other outdoor advertising facilities, publicly accessible sites on the Internet, direct mails or other similar types of general public political advertising or through flyers, handbills, bumper stickers and other nonperiodical publications, the communication, if authorized by a candidate, a candidate's authorized political committee or their agents, must clearly and conspicuously state that the communication has been so authorized and must clearly state the name and address of the person who made or financed the expenditure for the communication. A communication financed by a candidate or the candidate's committee is not required to state the address of the candidate or committee that financed the communication. If a communication that is financed by someone other than the candidate or the candidate's authorized committee is broadcast by radio, only the city and state of the address of the person who financed the communication must be stated.

2. Not authorized by candidate. If the communication described in subsection 1 is not authorized by a candidate, a candidate's authorized political committee or their agents, the communication must clearly and conspicuously state that the communication is not authorized by any candidate and state the name and address of the person who made or financed the expenditure for the communication, except that a communication broadcast by radio is only required to state the city and state of the address of the person that financed the communication. If the communication is in written form, the communication must contain at the bottom of the communication in print that is no smaller in size than 12-point bold print, Times New Roman font, the words "NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE."

2-A. Other communications. Whenever a person makes an expenditure to finance a communication that names or depicts a clearly identified candidate and that is disseminated during the 28 days, including election day, before a primary election, during the 35 days, including election day, before a special election or during the period of time from Labor Day to the election day for a general election through the media described in subsection 1, the communication must state the name and address of the person who made or financed the communication and a statement that the communication was or was not authorized by the candidate, except that a communication broadcast by radio is only required to state the city and state of the address of the person that financed the communication. The disclosure is not required if the communication was not made for the purpose of influencing the candidate's nomination for election or election.

2-B. Top 3 funders; independent expenditures. A communication that is funded by an entity making an independent expenditure as defined in section 1019-B, subsection 1 must conspicuously include the following statement:

"The top 3 funders of (name of entity that made the independent expenditure) are (names of top 3 funders)."

The information required by this subsection may appear simultaneously with any statement required by subsection 2 or 2-A. A communication that contains a visual aspect must include the statement in written text. A communication that does not contain a visual aspect must include an audible statement. This statement is required only for communications made through broadcast or cable television, broadcast radio, Internet audio and video programming, direct mail or newspaper or other periodical publications.



A cable television, broadcast television or Internet video communication must include both an audible and a written statement. For a cable television, broadcast television or Internet video communication 30 seconds or less in duration, the audible statement may be modified to include only the single top funder.

The top funders named in the required statement consist of the funders providing the highest dollar amount of funding to the entity making the independent expenditure since the day following the most recent general election day.

A. For purposes of this subsection, “funder” includes:

(1) Any entity that has made a contribution as defined in section 1052, subsection 3 to the entity making the independent expenditure since the day following the most recent general election day; and

(2) Any entity that has given a gift, subscription, loan, advance or deposit of money or anything of value, including a promise or agreement to provide money or anything of value whether or not legally enforceable, except for transactions in which a fair value is given in return, since the day following the most recent general election day.

B. If funders have given equal amounts, creating a tie in the ranking of the top 3 funders, the tie must be broken by naming the tying funders in chronological order of the receipt of funding until 3 funders are included in the statement. If the chronological order cannot be discerned, the entity making the independent expenditure may choose which of the tying funders to include in the statement. In no case may a communication be required to include the names of more than 3 funders.

C. The statement required under this subsection is not required to include the name of any funder who has provided less than \$1,000 to the entity making the independent expenditure since the day following the most recent general election day.

D. If only one or 2 funders must be included pursuant to this subsection, the communication must identify the number of funders as “top funder” or “top 2 funders” as appropriate. If there are no funders required to be included under this subsection, no statement is required.

E. When compiling the list of top funders, an entity making an independent expenditure may disregard any funds that the entity can show were used for purposes unrelated to the candidate mentioned in the communication on the basis that funds were either spent in the order received or were strictly segregated in other accounts.

F. In any communication consisting of an audio broadcast of 30 seconds or less or a print communication of 20 square inches or less, the requirements of this subsection are satisfied by including the name of the single highest funder only.

G. If the list of funders changes during the period in which a recurring communication is aired or published, the statement appearing in the communication must be updated at the time that any additional payments are made for that communication.

H. The commission may establish by routine technical rule, adopted in accordance with Title 5, chapter 375, subchapter 2-A, forms and procedures for ensuring compliance with this subsection. Rules adopted pursuant to this paragraph must ensure that the information required by this subsection is effectively conveyed for a sufficient duration and in a sufficient font size or screen size where applicable without undue burden on the ability of the entity to make the communication. The rules must also provide an exemption for types of communications for which the required statement would be impossible or impose an unusual hardship due to the unique format or medium of the communication.

3. Broadcasting prohibited without disclosure. No person operating a broadcasting station or cable television system within this State may broadcast any communication, as described in subsections 1 to 2-A, without an oral or written visual announcement of the disclosure required by this section.

3-A. In-kind contributions of printed materials. A candidate, political committee or political action committee shall report on the campaign finance report as a contribution to the candidate, political committee or political action committee any contributions of in-kind printed materials to be used in the support of a candidate or in the support or defeat of a ballot question. Any in-kind contributions of printed materials used or distributed by a candidate, political committee or political action committee must include the name or title of that candidate, political committee or political action committee as the authorizing agent for the printing and distribution of the in-kind contribution.

3-B. Newspapers. A newspaper may not publish a communication described in subsections 1 to 2-A without including the disclosure required by this section. For purposes of this subsection, "newspaper" includes any printed material intended for general circulation or to be read by the general public, including a version of the newspaper displayed on a website owned or operated by the newspaper. When necessary, a newspaper may seek the advice of the commission regarding whether or not the communication requires the disclosure.

4. Enforcement. A violation of this section may result in a civil penalty of no more than 100% of the amount of the expenditure in violation, except that an expenditure for yard signs lacking the required information may result in a maximum civil penalty of \$200. In assessing a civil penalty, the commission shall consider, among other things, how widely the communication was disseminated, whether the violation was intentional, whether the violation occurred as the result of an error by a printer or other paid vendor and whether the communication conceals or misrepresents the identity of the person who financed it. If the person who financed the communication or who committed the violation corrects the violation within 10 days after receiving notification of the violation from the commission by adding the missing information to the communication, the commission may decide to assess no civil penalty.

5. Telephone calls. Prerecorded automated telephone calls and scripted live telephone communications that name a clearly identified candidate during the 28 days, including election day, before a primary election, during the 35 days, including election day, before a special election or during the period of time from Labor Day to the general election day for a general election must clearly state the name of the person who made or financed the expenditure for the communication and whether the communication was authorized by a candidate, except for prerecorded automated telephone calls paid for by the candidate that use the candidate's voice in the telephone call and that are made in support of that candidate. Telephone surveys that meet generally accepted standards for polling research and that are not conducted for the purpose of influencing the voting position of call recipients are not required to include the disclosure.

6. Exclusions. The requirements of this section do not apply to:

A. Handbills or other literature produced and distributed at a cost not exceeding \$100 and prepared by one or more individuals who are not required to register or file campaign finance reports with the commission and who are acting independently of and without authorization by a candidate, candidate's authorized campaign committee, party committee, political action committee or ballot question committee or an agent of a candidate, candidate's authorized campaign committee, party committee, political action committee or ballot question committee;

B. Campaign signs produced and distributed at a cost not exceeding \$100, paid for by one or more individuals who are not required to register or file campaign finance reports with the commission and who are acting independently of and without authorization by a candidate, candidate's authorized campaign committee, party committee, political action committee or ballot question committee or an agent of a candidate, candidate's authorized campaign committee, party committee, political action committee or ballot question committee;

C. Internet and e-mail activities costing less than \$100, as excluded by rule of the commission, paid for by one or more individuals who are not required to register or file campaign finance reports with the

commission and who are acting independently of and without authorization by a candidate, candidate's authorized campaign committee, party committee, political action committee or ballot question committee or an agent of a candidate, candidate's authorized campaign committee, party committee, political action committee or ballot question committee;

D. Communications in which the name or address of the person who made or authorized the expenditure for the communication would be so small as to be illegible or infeasible, including communications on items such as ashtrays, badges and badge holders, balloons, campaign buttons, clothing, coasters, combs, emery boards, envelopes, erasers, glasses, key rings, letter openers, matchbooks, nail files, noisemakers, paper and plastic cups, pencils, pens, plastic tableware, 12-inch or shorter rulers, swizzle sticks, tickets to fund-raisers and similar items determined by the commission to be too small and unnecessary for the disclosures required by this section and in electronic media advertisements where compliance with this section would be impractical due to size or character limitations; and

E. Campaign signs that are financed by the candidate or candidate's authorized committee and that clearly identify the name of the candidate and are lettered or printed individually by hand.

§ 1019-B. Reports of independent expenditures

1. Independent expenditures; definition. For the purposes of this section, an “independent expenditure” means any expenditure made by a person, party committee or political action committee that is not made in cooperation, consultation or concert with, or at the request or suggestion of, a candidate, a candidate’s authorized political committee or an agent of either and that:

A. Is made to design, produce or disseminate any communication that expressly advocates the election or defeat of a clearly identified candidate; or

B. Unless the person, party committee or political action committee making the expenditure demonstrates under subsection 2 that the expenditure was not intended to influence the nomination, election or defeat of the candidate, is made to design, produce or disseminate a communication that names or depicts a clearly identified candidate and is disseminated during the 28 days, including election day, before a primary election; during the 35 days, including election day, before a special election; or from Labor Day to a general election day.

2. Commission determination. A person, party committee or political action committee may request a determination that an expenditure that otherwise meets the definition of an independent expenditure under subsection 1, paragraph B is not an independent expenditure by filing a signed written statement with the commission within 7 days of disseminating the communication stating that the cost was not incurred with the intent to influence the nomination, election or defeat of a candidate, supported by any additional evidence the person, party committee or political action committee chooses to submit. The commission may gather any additional evidence it determines relevant and material and shall determine by a preponderance of the evidence whether the cost was incurred with intent to influence the nomination, election or defeat of a candidate.

3. Report required; content; rules. Repealed

4. Report required; content; rules. A person, party committee or political action committee that makes any independent expenditure in excess of \$250 during any one candidate’s election shall file a report with the commission. In the case of a municipal election, the report must be filed with the municipal clerk.

A. A report required by this subsection must be filed with the commission according to a reporting schedule that the commission shall establish by rule that takes into consideration existing campaign finance reporting requirements. Rules adopted pursuant to this paragraph are routine technical rules as defined in Title 5, chapter 375, subchapter 2-A.

B. A report required by this subsection must contain an itemized account of each expenditure in excess of \$250 in any one candidate’s election, the date and purpose of each expenditure and the name of each payee or creditor. The report must state whether the expenditure is in support of or in opposition to the candidate and must include, under penalty of perjury, as provided in [Title 17-A, section 451](#), a statement under oath or affirmation whether the expenditure is made in cooperation, consultation or concert with, or at the request or suggestion of, the candidate or an authorized committee or agent of the candidate.

C. A report required by this subsection must be on a form prescribed and prepared by the commission. A person filing this report may use additional pages if necessary, but the pages must be the same size as the pages of the form. The commission may adopt procedures requiring the electronic filing of an independent expenditure report, as long as the commission receives the statement made under oath or affirmation set out in paragraph B by the filing deadline and the commission adopts an exception for

21-A M.R.S. § 1019-B

persons who lack access to the required technology or the technological ability to file reports electronically. The commission may adopt procedures allowing for the signed statement to be provisionally filed by facsimile or electronic mail, as long as the report is not considered complete without the filing of the original signed statement.

5. Exclusions. An independent expenditure does not include:

A. Repealed

B. A telephone survey that meets generally accepted standards for polling research and that is not conducted for the purpose of changing the voting position of the call recipients or discouraging them from voting;

C. A telephone call naming a clearly identified candidate that identifies an individual's position on a candidate, ballot question or political party for the purpose of encouraging the individual to vote, as long as the call contains no advocacy for or against any candidate; and

D. A voter guide that consists primarily of candidates' responses to surveys and questionnaires and that contains no advocacy for or against any candidate.

21-A M.R.S. § 1052

§ 1052. Definitions

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

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

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

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

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

3. Contribution. “Contribution” includes:

- A. A gift, subscription, loan, advance or deposit of money or anything of value made to or received by a committee for the purpose of initiating or influencing a campaign, including but not limited to:
 - (1) Funds that the contributor specified were given, in whole or in part, in connection with a campaign;
 - (2) Funds provided in response to a solicitation that would lead the contributor to believe that the funds would be used specifically, in whole or in part, for the purpose of initiating or influencing a campaign; and
 - (3) Funds that can reasonably be determined to have been provided by the contributor for the purpose of initiating or influencing a campaign when viewed in the context of the contribution and the recipient committee’s activities regarding a campaign;
- A-1. Any funds deposited or transferred into the campaign account described in section 1054;
- B. A contract, promise or agreement, expressed or implied, whether or not legally enforceable, to make a contribution to a committee;
- C. Any funds received by a committee that are to be transferred to any candidate, committee, campaign or organization for the purpose of initiating or influencing a campaign; or
- D. The payment, by any person or organization, of compensation for the personal services of other persons provided to a committee that is used by the committee to initiate or influence a campaign.

21-A M.R.S. § 1052

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

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

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

4. Expenditure. The term "expenditure":

A. Includes:

- (1)** A purchase, payment, distribution, loan, advance, deposit or gift of money or anything of value, made for the purpose of initiating or influencing a campaign;
 - (1-A)** Any purchase, payment, distribution, loan, advance, deposit or gift of money made from the campaign account described in section 1054;
 - (2)** A contract, promise or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure for the purposes set forth in this paragraph; and
 - (3)** The transfer of funds by a political action committee to another candidate or political committee; and

B. Does not include:

- (1)** Any news story, commentary or editorial distributed through the facilities of any broadcasting station, cable television system, newspaper, magazine or other periodical publication, unless these facilities are owned or controlled by any political party, political committee, candidate or the spouse or domestic partner of a candidate;
- (2)** Activity designed to encourage individuals to register to vote or to vote, if that activity or communication does not mention a clearly identified candidate;
- (3)** Any communication by any membership organization or corporation to its members or stockholders, if that membership organization or corporation is not organized primarily for the purpose of influencing the nomination or election of any person to state or county office;
- (4)** The use of real or personal property and the cost of invitations, food and beverages, voluntarily provided by a political action committee in rendering voluntary personal services for candidate-related activities, if the cumulative value of these activities by the political action committee on behalf of any candidate does not exceed \$250 with respect to any election;
- (5)** Any unreimbursed travel expenses incurred and paid for by a political action committee that volunteers personal services to a candidate, if the cumulative amount of these expenses does not exceed \$100 with respect to any election;
- (6)** Any communication by a committee that is not made for the purpose of influencing the nomination or election of any person to state or county office; and
- (7)** Any payments to initiate a people's veto referendum or the direct initiative of legislation made prior to the submission of an application to the Department of the Secretary of State as provided in section 901.

21-A M.R.S. § 1052

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

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

4-C. (TEXT EFFECTIVE UNTIL 1/01/23) Leadership political action committee. “Leadership political action committee” means a political action committee, other than a caucus political action committee under section 1053-C, that was directly or indirectly established by a current member of the Legislature or that is directly or indirectly maintained or controlled by a current member of the Legislature.

4-C. (TEXT EFFECTIVE 1/01/23) Leadership political action committee. “Leadership political action committee” means a political action committee, other than a caucus political action committee under section 1053-C, that was directly or indirectly established by a current member of the Legislature or that is directly or indirectly maintained or controlled by a current member of the Legislature.

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

A. Includes:

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

B. Does not include:

- (1) A candidate or a candidate’s treasurer under section 1013-A, subsection 1;
- (2) A candidate’s authorized political committee under section 1013-A, subsection 1, paragraph B;
- (3) A party committee under section 1013-A, subsection 3; or
- (4) An exempt donor.

6. (TEXT EFFECTIVE 1/01/23) Separate segregated fund committee. “Separate segregated fund committee” means a political action committee described in subsection 5, paragraph A, subparagraph (1).

Chapter 1: PROCEDURES

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

...

SECTION 7. EXPENDITURES

1. **Expenditures by Consultants, Employees, and Other Agents of a Political Campaign**
 - A. Each expenditure made on behalf of a candidate, political committee, or political action committee by any person, agency, firm, organization, etc., employed or retained for the purpose of organizing, directing, managing or assisting the candidate, the candidate's committee, or the political action committee must be reported separately by the candidate or committee as if made or incurred by the candidate or committee directly. The report must include the name of the third party vendor or payee to whom the expenditure was made, the date of the expenditure, and the purpose and amount of the expenditure. It is not sufficient to report only the total retainer or fee paid to the person, agency, firm, organization, etc., if that retainer or fee was used to pay third party vendors or payees for campaign-related goods and services.
 - B. If a candidate or committee has paid a media buyer, advertising consultant or similar contractor to purchase advertising time or for the production of television or radio advertising, the candidate or committee may disclose the advertising time and production costs in the aggregate, rather than itemizing each payment made by the contractor to a third party vendor or payee. *Maine Clean Election Act* candidates must obtain from their contractor(s) documentation of every payment of \$50 or more made on their behalf by a contractor or subcontractor related to television or radio advertising.
2. **Expenditures by Political Action Committees.** In addition to the requirements set forth in 21-A M.R.S.A. §1060(4), the reports must contain the purpose of each expenditure and the name of each payee and creditor.

3. **Reporting Debts and Unpaid Obligations**

- * A. The following events constitute expenditures, even if the payment for a good or service has not been made at the time of the event:
- (1) The placement of an order for a good or service;
 - (2) The signing of a contract for a good or service;
 - (3) The acceptance of the delivery of a good or the performance of a service by a vendor; or
 - (4) A promise or an agreement (including an implied one) that a payment will be made in exchange for a good or service.
- B. For reporting purposes, the expenditures listed in paragraph A are designated as debts or obligations prior to payment for the goods or services being made.
- C. If a person required to file a campaign finance report has a debt or obligation which remains unpaid at the end of the report period, the person shall report the date, amount, vendor, and purpose of the debt or obligation. If the exact amount is not known, the person filing the report shall report an estimate of the amount (preferably obtained in a written statement from the vendor).
- D. If a debt or obligation occurs in the same report period as a payment for that debt or obligation, the person filing the report will report only the payment, not the debt or obligation.
- E. A candidate or committee is not required to report a payment for a good or service in a 24-Hour Report, if the candidate or committee reported a debt for that good or service in the last regularly scheduled campaign finance report.

4. **Advance Purchases of Goods and Services for the General Election** *[Repealed]*

5. All campaign-related payments made with the personal funds or credit card of the candidate or an individual authorized by the candidate must be reported as expenditures in the reporting period during which the payment to the vendor or payee is made. The candidate must report the name of the vendor or payee to whom the payment was made, the date of the expenditure, and the purpose and amount of the expenditure. When the expenditure is reported, the candidate should indicate the person who made the payment by entering "Paid by [name of candidate or supporter]" in the remarks section of the expenditure schedule. It is not sufficient to report only the name of the candidate or authorized individual to whom reimbursement was made and the total amount of the reimbursement.
6. Multiple expenditures for bank fees and for vehicle travel may be reported in an aggregate amount, provided that the candidate or committee identifies the time period of the expenditures in the remarks section of the report.
7. When a political action committee or party committee makes an expenditure for a communication to voters for the purpose of influencing the election of a clearly identified

candidate, the amount spent to influence that candidate's election must be specified on the regularly filed campaign finance report of the committee, regardless whether the communication expressly advocates for the election or defeat of the candidate. If a single expenditure influences the election of more than one candidate, the political action committee or party committee shall itemize the amount spent per candidate.

8. Payments made or obligations incurred solely for the purpose of conducting activities to determine whether an individual should become a candidate are not expenditures if the individual does not become a candidate. Examples of such activities include, but are not limited to, conducting a poll, telephone calls, and travel. The individual shall keep records of all such payments and obligations. If the individual becomes a candidate, the payments made or obligations incurred are expenditures and are subject to the reporting requirements of 21-A M.R.S.A. §1017. Such expenditures must be disclosed in the first report filed by the candidate or the candidate's authorized campaign committee, regardless of the date when the funds were expended, in accordance with the Commission's procedures for reporting expenditures.

Payments made for activities indicating that an individual has decided to become a candidate for a particular office are expenditures. Examples of such activities include, but are not limited to: using general public political advertising to publicize his or her intention to campaign for office; hiring staff or consultants for campaign activities; raising funds in excess of what could reasonably be expected to be used for exploratory activities; making or authorizing statements that refer to him or her as a candidate; or taking action to qualify for the ballot.

9. **Exception to Disclaimer Requirements for Certain Handbills, Campaign Signs, and Internet or E-Mail Communications**

For purposes of applying the exclusions listed in Title 21-A, section 1014, subsection 6, paragraphs A through C, the following terms have the following meanings:

- A. "Cost" includes all payments or obligations incurred, and the value of all goods and services received, for the purpose of creating, designing, preparing or distributing the communications.
- B. "Internet or e-mail communication" means any communication transmitted over the Internet, including but not limited to: sending or forwarding electronic messages; social networking; providing a hyperlink or other direct access to another person's website; creating, maintaining or hosting a website or blog; placing material on another person's website; and any other form of communication distributed over the Internet.
- C. "Acting independently of and without authorization by a candidate, candidate's authorized campaign committee, party committee, political action committee or ballot question committee or an agent [thereof]" means acting without any suggestion, request, direct or indirect authorization or compensation or reimbursement from any such candidate, committee or agent.
10. **Press Exemption.** In order for the costs of preparing and disseminating a news story, commentary, or editorial to be exempt from the definitions of expenditure under the press exemption [§§ 1012(3)(B)(1) & 1052(4)(B)(1)], the following criteria must be met:

- A. the names of the persons or entities who own, control and operate the broadcasting station or publication are identified within the publication or otherwise made known to the public; and
- B. the broadcasting station or publication is not owned or controlled by any political party, political action committee or ballot question committee and is not owned or controlled by any candidate for state, county or municipal office whose candidacy, election campaign, or opponent is a subject of the news story, commentary or editorial, or by the authorized campaign committee of such a candidate, or by a member of such a candidate's immediate family.

In addition to the above criteria, to qualify as a periodical publication, including one in electronic form on the Internet, or a newspaper or magazine, a publication (i) must have been disseminating news stories, commentaries or editorials on a variety of topics to the general public on a periodic basis for at least the previous twelve months, or (ii) must have a record of disseminating news stories, commentaries or editorials on a variety of topics to the general public or other objective indicators that the publication will continue to be published on a periodic basis beyond the election cycle during which the press exemption is claimed.

For purposes of this section, broadcasting station includes a cable television system.

- 11. **Shared Expenditures by Candidates.** When two or more candidates have jointly purchased a communication to voters or another good or service, a candidate will not be considered to have received an in-kind contribution if the cost is allocated among the candidates in proportion to the benefit received by each candidate.
- 12. **Disclosure of top funders in paid communications.** If an entity makes an independent expenditure in excess of \$250 to influence a candidate's election, the communication is required to contain the entity's top three funders under Title 21-A, section 1014, subsection 2-B.
 - A. The disclosure included in a cable television or broadcast television communication must conform with those portions of federal regulations 47 CFR §73.1212(a)(2)(ii) and 47 CFR §76.1615(a) which regulate text size and duration of sponsorship information. Specifically
 - (1) the font size must be equal to or greater than four percent of the vertical picture height, and
 - (2) the text must appear for not less than four seconds.
 - B. For communications listed in Title 21-A, section 1014, subsection 2-B with a visual aspect other than television or video communications, the statement of funders must appear in a font size that is 12-point or larger.
 - C. If the communication is funded by a political action committee that is a separate or segregated fund as defined in Title 21-A, section 1052, subsection (5)(A)(1), but not a separate legal entity, the top three funders to be listed are the top three



funders of the legal entity (corporation, membership organization, cooperative or labor or other organization) that established the fund.



- D. If the communication is funded by a political action committee that is fully funded or controlled by another political action committee or legal entity, the top three funders to be listed are the top three funders of that entity that fully funds or controls the political action committee.
- E. For any other political action committee that does not fall within the parameters of paragraphs C or D, the top three funders are the contributors who have given the top three aggregate contributions, as defined in Title 21-A, section 1052(3), during the time period specified in Title 21-A, section 1014, subsection 2-B, paragraph A.

Communications for which including the statement required by Title 21-A, section 1014, subsection 2-B would be impossible or impose an unusual hardship due to their format or medium are exempt from the requirements of that section.

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SECTION 10. REPORTS OF INDEPENDENT EXPENDITURES

1. **General.** Any person, party committee, political committee or political action committee that makes any independent expenditure in excess of \$250 per candidate in an election must file a report with the Commission according to this section.
2. **Definitions.** For purposes of this section, the following phrases are defined as follows:
 - A. "Clearly identified," with respect to a candidate, has the same meaning as in Title 21-A, chapter 13, subchapter II.
 - B. "Expressly advocate" means any communication that
 - (1) uses phrases such as "vote for the Governor," "reelect your Representative," "support the Democratic nominee," "cast your ballot for the Republican challenger for Senate District 1," "Jones for House of Representatives," "Jean Smith in 2002," "vote Pro-Life" or "vote Pro-Choice" accompanied by a listing of clearly identified candidates described as Pro-Life or Pro-Choice, "vote against Old Woody," "defeat" accompanied by a picture of one or more candidate(s), "reject the incumbent," or communications of campaign slogan(s) or individual word(s), which in context can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidate(s), such as posters, bumper stickers, advertisements, etc. which say "Pick Berry," "Harris in 2000," "Murphy/Stevens" or "Canavan!"; or
 - (2) is susceptible of no reasonable interpretation other than as an appeal to vote for or against a clearly identified candidate.
 - C. "Independent expenditure" has the same meaning as in Title 21-A §1019-B. Any expenditure made by any person in cooperation, consultation or concert with, or

at the request or suggestion of, a candidate, a candidate's political committee or their agents is considered to be a contribution to that candidate and is not an independent expenditure.

3. **Reporting Schedules.** Independent expenditures in excess of \$250 per candidate per election made by any person, party committee, political committee or political action committee must be reported to the Commission in accordance with the following schedule:
 - A. *[Repealed]*
 - B. *[Repealed]*
 - (1) **60-Day Pre-Election Report.** A report must be filed by 11:59 p.m. on the 60th day before the election is held and be complete as of the 61st day before the election.
 - (2) **Two-Day Report.** From the 60th day through the 14th day before an election, a report must be filed within two calendar days of the expenditure.
 - (3) **One-Day Report.** After the 14th day before an election, a report must be filed within one calendar day of the expenditure.

For purposes of the filing deadlines in this paragraph, if the expenditure relates to a legislative or gubernatorial election and the filing deadline occurs on a weekend, holiday, or state government shutdown day, the report must be filed on the deadline. If the expenditure relates to a county or municipal election, the report may be filed on the next regular business day.
 - C. Reports must contain information as required by Title 21-A, chapter 13, subchapter II (§§ 1016-1017-A), and must clearly identify the candidate and indicate whether the expenditure was made in support of or in opposition to the candidate.
 - D. A separate 24-Hour Report is not required for expenditures reported in an independent expenditure report.
 - E. An independent expenditure report may be provisionally filed by facsimile or by electronic mail to an address designated by the Commission, as long as the facsimile or electronic copy is filed by the applicable deadline and an original of the same report is received by the Commission within five calendar days thereafter.
4. **Multi-Candidate Expenditures.** When a person or organization is required to report an independent expenditure for a communication that supports multiple candidates, the cost should be allocated among the candidates in rough proportion to the benefit received by each candidate.
 - A. The allocation should be in rough proportion to the number of voters who will receive the communication and who are in electoral districts of candidates named or depicted in the communication. If the approximate number of voters in each district who will receive the communication cannot be determined, the cost may

be divided evenly among the districts in which voters are likely to receive the communication.

[NOTE: FOR EXAMPLE, IF CAMPAIGN LITERATURE NAMING SENATE CANDIDATE X AND HOUSE CANDIDATES Y AND Z ARE MAILED TO 10,000 VOTERS IN X'S DISTRICT AND 4,000 OF THOSE VOTERS RESIDE IN Y'S DISTRICT AND 6,000 OF THOSE VOTERS LIVE IN Z'S DISTRICT, THE ALLOCATION OF THE EXPENDITURE SHOULD BE REPORTED AS: 50% FOR X, 20% FOR Y, and 30% FOR Z.]

- B. If multiple county or legislative candidates are named or depicted in a communication, but voters in some of the candidates' electoral districts will not receive the communication, those candidates should not be included in the allocation.

[NOTE: FOR EXAMPLE, IF AN EXPENDITURE ON A LEGISLATIVE SCORECARD THAT NAMES 150 LEGISLATORS IS DISTRIBUTED TO VOTERS WITHIN A TOWN IN WHICH ONLY ONE LEGISLATOR IS SEEKING RE-ELECTION, 100% OF THE COST SHOULD BE ALLOCATED TO THAT LEGISLATOR'S RACE.]

5. **Rebuttable Presumption.** Under Title 21-A M.R.S.A. §1019-B(1)(B), an expenditure made to design, produce or disseminate a communication that names or depicts a clearly identified candidate and that is disseminated during the 28 days before a primary election, the 35 days before a special election or from Labor Day to the general election will be presumed to be an independent expenditure, unless the person making the expenditure submits a written statement to the Commission within 48 hours of the expenditure stating that the cost was not incurred with the intent to influence the nomination, election or defeat of a candidate.

- A. The following types of communications may be covered by the presumption if the specific communication satisfies the requirements of Title 21-A M.R.S.A. §1019-B(1)(B):

- (1) Printed advertisements in newspapers and other media;
- (2) Television and radio advertisements;
- (3) Printed literature;
- (4) Recorded telephone messages;
- (5) Scripted telephone messages by live callers; and
- (6) Electronic communications.

This list is not exhaustive, and other types of communications may be covered by the presumption.

- B. The following types of communications and activities are not covered by the presumption, and will not be presumed to be independent expenditures under Title 21-A M.R.S.A. §1019-B(1)(B):
- (1) news stories and editorials, unless the facilities distributing the communication are owned or controlled by the candidate, the candidate's immediate family, or a political committee;
 - (2) activity or communication designed to encourage individuals to register to vote or to vote if that activity or communication does not name or depict a clearly identified candidate;
 - (3) any communication from a membership organization to its members or from a corporation to its stockholders if the organization or corporation is not organized primarily for the purpose of influencing the nomination or election of any person for state or county office;
 - (4) the use of offices, telephones, computers, or similar equipment when that use does not result in additional cost to the provider; and
 - (5) other communications and activities that are excluded from the legal definition of "expenditure" in the Election Law.
- C. If an expenditure is covered by the presumption and is greater than \$250 per candidate per election, the person making the expenditure must file an independent expenditure report or a signed written statement that the expenditure was not made with the intent to influence the nomination, election or defeat of a candidate. The filing of independent expenditure reports should be made in accordance with the filing schedule in subsections 3(A) and 3(B) of this rule. Any independent expenditure of \$250 or less per candidate per election does not require the filing of an independent expenditure report or a rebuttal statement.
- D. If a committee or association distributes copies of printed literature to its affiliates or members, and the affiliates or members distribute the literature directly to voters, the applicable presumption period applies to the date on which the communication is disseminated directly to voters, rather than the date on which the committee or association distributes the literature to its affiliates or members.
- E. For the purposes of determining whether a communication is covered by the presumption, the date of dissemination is the date of the postmark, hand-delivery, or broadcast of the communication.
- F. An organization that has been supplied printed communications covered by the presumption and that distributes them to voters must report both its own distribution costs and the value of the materials it has distributed, unless the organization supplying the communications has already reported the costs of the materials to the Commission. If the actual costs of the communications cannot be determined, the organization distributing the communication to voters must report the estimated fair market value.

- G. If a person wishes to distribute a specific communication that appears to be covered by the presumption and the person believes that the communication is not intended to influence the nomination, election or defeat of a candidate, the person may submit the rebuttal statement to the Commission in advance of disseminating the communication for an early determination. The request must include the complete communication and be specific as to when and to whom the communication will be disseminated.

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