



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

To: Commissioners
From: Heidi Hoefler, Political Committee & Lobbyist Registrar
Date: September 2, 2025
Re: Late Filing of Ballot Question Committee Registration and Recommended Penalty –
Protect ME – No Red Flag

If a “person”, which is defined as an individual or organization, raises or spends more than \$5,000 (the “registration threshold”) to influence a ballot question campaign, that person must register with the Commission on Governmental Ethics and Election Practices (the “Commission”) as a ballot question committee within 7 days of exceeding the registration threshold. Protect ME – No Red Flag (the “BQC”) is a ballot question committee formed by the Sportsman’s Alliance of Maine (“SAM”) to oppose the red flag citizen initiative on the November 2025 ballot. According to the BQC’s initial campaign finance report, it exceeded the registration threshold on May 29, 2025. Although the registration was due on or before 11:59 pm on June 5, 2025, the BQC did not submit its registration until July 1, 2025, which was 26 calendar days after the deadline for submission.

LEGAL REQUIREMENTS

Late-filed Registration. The process for determining whether a fine should be assessed for the late filing of a committee registration differs from the process for calculating a preliminary penalty for the late filing of a committee campaign finance report. As stated above, a person is required to register within 7 days of receiving contributions or making expenditures in excess of \$5,000. 21-A M.R.S. §1052-A(1)(A-1). If a ballot question committee does not timely file its registration, the Commission *may* assess a fine of no more than \$2,500. When determining whether to assess a fine and the amount of a fine, the Commission must consider factors such as:

- whether the violation was intentional;

- the amount of campaign and financial activity that occurred before the committee registered;
- whether the committee intended to conceal its campaign or financial activity; and
- the level of experience of the committee's volunteers and staff.

21-A M.R.S. § 1062-A(1).

DISCUSSION AND STAFF RECOMMENDATION

On May 29, 2025, the BQC received a contribution of \$50 that when combined with a previous contribution of \$5,000 (a transfer from SAM's general treasury to the BQC) on May 18, 2025, caused the BQC to exceed the registration threshold. At the end of June, Commission staff received a call from Kim Moulton at SAM. Ms. Moulton is the Authorized Agent for the BQC. Ms. Moulton informed us that since she had not seen any reminders about the upcoming filing deadline for the new BQC, she checked on the BQC registration and discovered that although the registration documents had been filled out, the registration had not been submitted to the Commission. Ms. Moulton believed that David Trahan, the Executive Director of SAM and the BQC's Principal Officer, had timely hand-delivered the completed registration to the Commission's offices prior to the deadline.

As soon as she realized that was not the case, Ms. Moulton promptly contacted the Commission staff and submitted the registration materials.

Commission staff considered the following when determining its recommendation to the Commission:

- The violation was not intentional. The committee intended to register and took significant steps to complete the registration process, but there was a misunderstanding as to who was delivering the paperwork to the Commission.
- There was no intent to conceal the campaign or financial activity. As soon as it was discovered the BQC registration had not been timely filed, Ms. Moulton contacted Commission staff to acknowledge the error and she promptly submitted the completed registration documents.
- A significant portion of the contributions was the initial \$5,000 general treasury transfer.
- SAM is an experienced organization which has been involved in multiple ballot question campaigns.

- Since 2018, the Commission staff has recommended penalties of at least \$750 when a campaign finance *report* is filed late for routine, good faith reasons, sometimes with further reductions for good cause.
- In May 2024, the Commission assessed a \$250 penalty against a municipal ballot question committee in Boothbay Harbor for not *registering* on time, Citizens for a Bright Future. However, that matter is distinguishable from the current matter. In the 2024 matter, the people who funded the committee were caught off guard because the law had recently changed to apply to municipal referenda. This was one of the factors in the assessment of a lower penalty. This is the only penalty assessed by the Commission for a late-filed committee registration since 2018.

After considering the factors that led to the late filing and factoring in the good faith efforts to timely file the BQC registration, as well as the level of experience SAM personnel has with campaign finance filing requirements, Commission staff recommends the following:

- A finding that the committee violated 21-A M.R.S. § 1052-A(1)(A-1) by not registering with the Commission within 7 days of receiving contributions or making expenditures totaling more than \$5,000; and
- Assessment of a \$500 penalty pursuant to 21-A M.R.S. § 1062-A(1) for this violation.

In recommending a penalty of \$500, the staff is putting weight on the significant steps taken by Ms. Moulton to register the BQC on time. We acknowledge that SAM has been involved in multiple ballot questions and should be held to a high standard. If the Commission believes the recommended penalty of \$500 is insufficient as a precedent or deterrent, the Commission has the discretion to assess a higher penalty.

Commission staff would like to note that we offered SAM the opportunity to submit comments for you to consider. Because they felt the staff recommendation of \$500 was fair and reasonable, they did not submit comments.



Commission on Governmental Ethics and Election Practices
Mail: 135 State House Station, Augusta, Maine 04333
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Website: www.maine.gov/ethics
Phone: 207-287-4179
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2025 REGISTRATION: BALLOT QUESTION COMMITTEE

COMMITTEE INFORMATION	
Protect ME - No Red Flag 205 Church Hill Road Augusta, ME 04330	Phone: (207) 623-4589 Fax: Email: office@samofmaine.org Web:
TREASURER INFORMATION	
Ms. Lisa Keim 1505 Main Street Dixfield, ME 04224	Public: (207) 562-3023 Fax: Email: lisa.keim@hotmail.com
PRINCIPAL OFFICER INFORMATION	
Ms. David Trahan Principal Officer 2084 Washington Road Waldoboro, ME 04572	Public: (207) 691-0367 Email: david@samofmaine.org
PRIMARY FUNDRAISERS AND DECISION MAKERS	
FORM OF ORGANIZATION	
STATEMENT OF SUPPORT OR OPPOSITION	
OPPOSE	Do you want to allow courts to temporarily prohibit a person from having dangerous weapons if law enforcement, family, or household members show that the person poses a significant danger of causing physical injury to themselves or others
CERTIFICATION	
I, Ms. Lisa Keim, certify that the information in this registration is true, accurate, and complete.	
SIGNATURE	Date: July 01, 2025

Filed Date: 7/1/2025

Amended Date:

BQC Registration



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

Sent via Email and US Mail

July 11, 2025

Lisa Keim, Treasurer, Protect ME – No Red Flag (BQC)
1505 Main Street
Dixfield, ME 04224

Re: Notice of Late Filing of Ballot Question Committee Registration and Recommended Penalty

Dear Lisa Keim:

The Commission on Governmental Ethics and Election Practices (the “Commission”) staff has preliminarily found that the Protect ME – No Red Flag ballot question committee (the “committee”) was late in filing its registration. Although the registration was due by 11:59 p.m. on June 5, 2025, it was not filed until July 1, 2025.

Per 21-A M.R.S. § 1062-A(1), the Commission may assess a penalty of no more than \$2,500 for failure to timely file a ballot question committee registration. When assessing a penalty, the Commission must consider factors such as whether the violation was intentional, the amount of financial activity that occurred prior to the committee registering, whether the committee intended to conceal its financial activity, and the level of experience of the committee’s personnel with campaign finance filings.

After discussing with committee personnel the factors that led to the late filing and factoring in the good faith efforts made by personnel to timely file, as well as the level of experience the Sportsman’s Alliance of Maine personnel has with campaign finance filing requirements, the Commission staff will recommend the following to the Commission at its September 24, 2025, meeting:

- A finding that the committee violated 21-A M.R.S. § 1052-A(1)(A-1) by not registering with the Commission within 7 days of receiving contributions or making expenditures totaling more than \$5,000; and
- Assessment of a \$500 penalty pursuant to 21-A M.R.S. § 1062-A(1) for this violation.

The final decision on the amount of any penalty will be made by the members of the Commission. Please let me know if you have any questions.

Sincerely,

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

Heidi Hoefler
Political Committee & Lobbyist Registrar

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

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

Citizens for a Bright Future	Late Registration, late filing	\$3,866.00	\$250.00	5/29/2024
Citizens for a Bright Future	Missing Disclaimers on signs		\$50.00	5/29/2024
Planned Parenthood Maine Action Fund	Late IE Report	\$733.60	\$400.00	5/29/2024
Bangor Fire Fighters PAC Fund	Late to update their registration	\$250.00	\$0.00	5/29/2024
Maine Republican Party	2 Late 24-Hour Reports	\$38,839.80	\$3,000.00	9/25/2024
Friends of Maine Hospitals PAC	Late 24-Hour Report	\$900.00	\$500.00	9/25/2024
Local 349 PAC Fund	Substantially non-compliant 42-Day Post-Primary Report	\$1,369.00	\$500.00	9/25/2024
Maine Labor Climate PAC	Late 60-Day Pre-General IE Report	\$534.44	\$400.00	9/25/2024
Bright Future Maine PAC	Late 2-Day Pre-Primary IE	\$6,411.30	\$375.00	9/25/2024
Democrats of Kennebunk, Kennebunkport and Ar	Late July Semi-Annual Report	\$500.00	\$100.00	10/30/2024
Bright Future Maine PAC	Late 24-Hour Report	\$2,800.00	\$1,000.00	12/18/2024
Cumberland County Republican Committee	Late IE Report	\$382.50	\$100.00	12/18/2024
FAM PAC	Late IE Report	\$365.40	\$365.40	12/18/2024
Late Major Contributor Decisions				
Committee Name	Violation	Preliminary Penalty	Final Penalty	Commission Meeting Date
Waiver requests				
Mainers for Local Power PAC	Late Major Contributor (2)	\$53,431.15	\$2,500.00	3/10/2020
Maine Street Solutions - Protect Schools BQC	Late Major Contributor	\$25,000.00	\$2,000.00	5/27/2020
Clean Energy Matters PAC	Late Major Contributor Notice	\$50,000.00	\$2,500.00	3/31/2021
We the People PAC	Late Major Contributor Notice	\$11,500.00	\$2,500.00	5/26/2021
Mainers for Local Power PAC	Late Major Contributor Notice	\$13,786.32	\$2,500.00	8/23/2021
Maine Energy Progress	Late Major Contributor Notice	\$25,768.87	\$3,000.00	11/29/2023
Dorman Products	Late Major Contributor Report	\$15,000.00	\$5,000.00	11/29/2023
Maine Automotive Right to Repair	Late Major Contributor Notices (6)	\$240,000.00	\$35,000.00	11/29/2023
Genuine Parts Company	Late Major Contributor Report	\$50,000.00	\$5,000.00	1/31/2024
Our Power	Two Late Major Contributor Notices	\$28,155.08	\$6,000.00	2/27/2024
Other Enforcement Decisions				
Committee Name	Violation	Preliminary Penalty	Final Penalty	Commission Meeting Date
Other Violations				
Sara Gideon Leadership PAC	Contributions Made in Name of Another		\$500.00	10/30/2019
Working Families PAC	Failure to file 2020 October Quarterly; 11-Day Pre-General, 42-Day Post-General, and 2021 January Quarterly and April Quarterly campaign finance reports		\$3,750.00	5/26/2021
Mainers for Fair Laws BQC	Missing Disclaimers in television ads		\$2,500.00	9/29/2021
Working Families PAC	Over the limit contribution to Diane Russell senate campaign		\$285.00	9/29/2021
American Leadership Committee-Maine PAC	Missing top three donors		\$10,000.00	11/30/2022
Building the Maine House	Late 11-day Pre-Primary Report		\$0.00	7/24/2024

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

**Late Filing of Ballot Question Committee Registration – Protect ME – No Red Flag
Applicable Law** (pre-September 24, 2025 version)

Title 21-A

§1001. Definitions

3. Person. "Person" means an individual, committee, firm, partnership, corporation, association or organization.

§1052. Definitions

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-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.

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

§1052-A. Registration

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

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

A-1. A ballot question committee shall register with the commission within 7 days of receiving contributions or making expenditures in the aggregate in excess of \$5,000.

§1062-A. Failure to file on time

1. Registration. A political action committee required to register under section 1052-A, 1053-A or 1053-B or a ballot question committee required to register under section 1053-A that fails to do so or that fails to provide the information required by the commission for

registration may be assessed a fine of no more than \$2,500. In assessing a fine, the commission shall consider, among other things, whether the violation was intentional, the amount of campaign and financial activity that occurred before the committee registered, whether the committee intended to conceal its campaign or financial activity and the level of experience of the committee's volunteers and staff.