



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

To: Commissioners  
From: Jonathan Wayne, Executive Director  
Date: September 17, 2025  
Re: Update on Audits of 2024 Maine Clean Election Act Candidates

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The Commission on Governmental Ethics and Election Practices audits the campaign finances of all candidates for Governor who participate in the Maine Clean Election Act (MCEA) program and a random selection of 20% of the MCEA candidates for the Legislature. The Commission audits these candidates because more than \$4 million in public funds is paid to them each election year. The audits are conducted by an accounting firm selected through a competitive bidding process. The 2024 audits of legislative candidates have been conducted by Runyon Kersteen Ouellette, an accounting and business consulting firm based in South Portland which conducted the audits of 2018 - 2022 MCEA candidates. This year, the firm (referred to below as RKO) has been auditing 39 candidates for the Maine Legislature.

After the 2024 general election, RKO randomly selected the candidates who would be audited. The firm later requested documents from the selected candidates, such as bank account statements, invoices, mileage logs (if the campaign reimbursed anyone for vehicle travel), *etc.* Sometimes the documents provided by the candidates were incomplete, which required follow-up by the auditors and later by Commission staff. While most candidates are cooperative, slow responders can affect the progress of some of the audits. This year's audits are being supervised by Jen Connors. She is expected to attend the Commission's September 24, 2025 meeting in person to describe the audit and answer any questions. The Commission staff appreciates the efforts of the entire audit team at RKO.

The audit process includes the preparation of a report for each candidate selected for an audit. If RKO finds minor deviations from the MCEA reporting and

recordkeeping requirements, those issues are noted in the report as “exceptions.” Legal violations are referred to as “findings.” If RKO discovers any exceptions or findings, a draft version of the report is prepared and sent to the candidate, who may provide additional information or submit any written response they would like. RKO then prepares a final audit report.

The 22 final audit reports completed to date are attached for your reference. RKO has sent another 10 draft audit reports for a potential response. The analysis for another seven candidates is underway.

The 2024 audits thus far show a very high rate of compliance among MCEA candidates, which has been the pattern of the most recent election years. RKO has found exceptions for a number of candidates that involve a minor reporting or recordkeeping issue (*e.g.*, not reporting an unpaid debt when a vendor invoiced the candidate for goods or services, and instead reporting the expenditure in the next report period once the bill was paid). The 22 final audit reports completed have listed some exceptions but no findings. RKO has made two potential findings in the draft audit reports sent to candidates but these are minor and will not require any action by the Commission (a seed money error and insufficient documentation for \$65 in travel reimbursements).

July 14, 2025

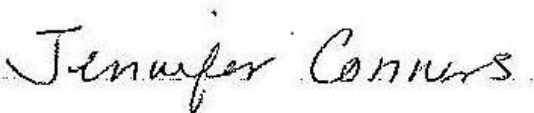
Hon. Mana Hared Abdi  
176 Blake Street #2  
Lewiston, ME 04240

Subject: 2024 Campaign Compliance Report

Dear Rep. Abdi:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures. You will note that the report identifies no exceptions in your reporting procedures.

Thank you for your cooperation during the review process.

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

Jennifer Connors, CPA  
RUNYON KERSTEEN OUELLETTE

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

**Maine Clean Election Act Compliance Report  
Candidate: Mana Hared Abdi**

**July 11, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Mana Hared Abdi for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Mana Hared Abdi for the House of Representatives for which MCEA funds were used. No exceptions or reporting deficiencies were noted in our review.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were ten transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of checks for those payments made by check and the rest of the disbursements, which were made by debit card or electronic payment, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the two vendor disbursements selected for testing, both were supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements were MCEA funds or prior campaign funds carried over. There were no seed money contributions.

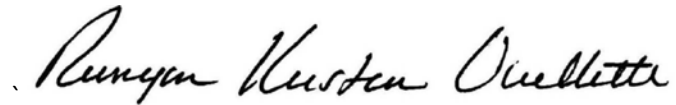
**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated August 26, 2024, in the amount of \$2,668.71 brought the balance in the campaign bank account to zero. The disbursement occurred within the forty-two day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remya Kristen Ouellette". The signature is written in a cursive, flowing style.

July 11, 2025  
South Portland, Maine

July 14, 2025

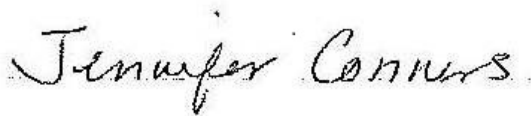
Hon. Barbara Bagshaw  
20 Plummer Road  
Windham, ME 04062

Subject: 2024 Campaign Compliance Report

Dear Rep. Bagshaw:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures. You will note that the report identifies no exceptions in your reporting procedures.

Thank you for your cooperation during the review process.

A handwritten signature in dark ink that reads "Jennifer Connors". The signature is written in a cursive, flowing style.

Jennifer Connors, CPA  
RUNYON KERSTEEN OUELLETTE



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

**Maine Clean Election Act Compliance Report  
Candidate: Barbara Bagshaw**

**July 11, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Barbara Bagshaw for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Barbara Bagshaw for the House of Representatives for which MCEA funds were used. No exceptions or reporting deficiencies were noted in our review.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were fifty-five transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of checks for those payments made by check and the rest of the disbursements, which were made by debit card or electronic payment, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the eighteen vendor disbursements selected for testing, all were supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the MCEA.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. All seed money contributions were within the allowable threshold and were from individuals. In addition, there were no additional contributions received after the candidate's certification.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated December 2, 2024, in the amount of \$86.78 brought the balance in the campaign bank account to zero. The disbursement occurred within the forty-two-day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remya Kristen Ouellette". The signature is written in a cursive, flowing style.

July 11, 2025  
South Portland, Maine

August 4, 2025

Hon. Susan Bernard  
70 Grimes Road  
Caribou, ME 04736

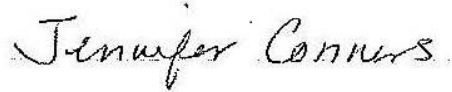
Subject: 2024 Campaign Compliance Report

Dear Sen. Bernard:

Enclosed please find the final report concerning the review of your 2024 Senate campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exceptions. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.

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

Jennifer Conners, CPA  
Runyon Kersteen Ouellette

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

**Maine Clean Election Act Compliance Report  
Candidate: Susan Bernard**

**July 30, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for Senate candidate Susan Bernard for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Susan Bernard for the Senate for which MCEA funds were used. There were seven exceptions and no findings, which are enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were sixty transactions on the candidate's bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date, except as follows:

**Exceptions:** There were three transactions that were reported on the 11 Day Pre-General Report with dates other than the earliest date of the transaction, as follows:

- The candidate reported an expenditure of \$115.00 dated September 20, 2024, to AI's Tastee Freeze for food for volunteers. However, the check was dated September 17, 2024. The transaction should have been reported on the 42 Day Pre-General Report, which has a reporting period of July 17, 2024, to September 17, 2024.
- The candidate reported an expenditure of \$6,500.00 dated September 23, 2024, to Spectrum Marketing for endorsement videos and marketing. However, the invoice for the expenditure was dated September 12, 2024. The transaction should have been reported as an unpaid debt on the 42 Day Pre-General Report, which has a reporting period of July 17, 2024, to September 17, 2024.

- The candidate reported an expenditure of \$52.75 dated September 25, 2024, to Mike's Signs and Designs for campaign signs for a vehicle, which was the date the payment cleared the bank. However, the invoice for the expenditure and the check for payment were dated September 9, 2024. The transaction should have been reported on the 42 Day Pre-General Report, which has a reporting period of July 17, 2024, to September 17, 2024.
- The candidate reported an expenditure of \$107.43 dated September 18, 2024, to Walmart for envelopes for mailings. However, the expenditure cleared the campaign bank statement on September 17, 2024. Therefore, the expenditure should have been reported on the 42 Day Pre-General report, which has a reporting period of July 17, 2024, to September 17, 2024.

**Exceptions:** The candidate reported two duplicate expenditures for two actual expenditures that cleared in September 2024 on the 11 Day Pre-General Report:

- The candidate reported two expenditures of \$107.43 dated September 18, 2024, to Walmart for envelopes for mailings. However, only one transaction cleared the campaign bank account on September 18, 2024, paid to Walmart for that amount. The result was that the amount paid to Walmart was overstated on the report.
- The candidate reported two expenditures of \$26.68 dated September 19, 2024, and September 20, 2024, to Wok N Roll for food. However, only one transaction cleared the bank account on September 20, 2024. The result was that the amount paid to Wok N Roll was overstated on the report.

**Exceptions: Other**

- The candidate reported an expenditure on the 42 Day Post-General Report of \$12.11 dated December 6, 2024, to WAGM for TV advertising. However, the expenditure did not clear the bank statements of the campaign bank account. Therefore, we were unable to verify that the expenditure was paid from clean election funds.

The candidate's response to the exceptions has been included with this report as an attachment. She explains that her treasurer reported expenditures on the date they cleared the bank, rather than the date the check was written. She acknowledges one data entry error in the amount of \$26.68 and reports that one vendor did not cash a \$12.11 check by the time the campaign bank account was closed.

During our review, we also identified an expenditure of \$110.40 to Black Amp White dated October 25, 2024, on the campaign's bank statement that did not seem related to the campaign and that was not included on the campaign finance reports. We discussed the expenditure with the candidate, who in turn communicated with Machias Savings Bank, the bank at which the campaign bank account was held. The bank determined that the expenditure was a fraudulent transaction that should not have been charged to the campaign bank account. However, as the fraud inquiry was done more than six months after the expenditure appeared on the bank statement, the campaign has been unable to recover the funds to date. Although it is not the campaign's fault that fraudulent charges cleared the campaign bank account, it would have been preferable if the campaign had noticed the fraudulent charge in November or December 2025 when completing the 42 Day Post-General Report. In her response, the candidate has said that if the bank is unable to recoup the funds, she will make every effort to make sure this money is refunded to the State.



**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained receipts for reimbursements and copies of cancelled checks for those payments made by check; the rest of the disbursements, which were made by check, debit card, or electronic payment were substantiated through payment receipts and review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting third party documentation and were for allowable expenditures under the MCEA. In addition, we ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the eleven disbursements selected for testing, all were supported by third party documentation. We reviewed all of the disbursements and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the MCEA.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. All seed money contributions were within the allowable threshold and were from individuals. In addition, there were no additional contributions received after the candidate's certification.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated December 20, 2024, in the amount of \$3,539.73 brought the balance in the campaign bank account to zero. Although the disbursement did not occur within the forty-two-day threshold, the disbursement was not considered an exception as the candidate was granted additional time to return the unspent funds.

Commissioners

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We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remy Hudson Ouellette". The signature is written in a cursive, flowing style.

July 30, 2025

South Portland, Maine

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Dear Ms. Conners,

After meetings with my treasurer, I offer the following comments as requested in your letter of July 14:

1. The treasurer reports that some expenditures were reported on the date of the bank withdrawal which would have put some of the expenditures on the 11-day report.

2. We had several purchases from Spectrum dated 9/23 (reported in the 11-day Pre-General report). It is possible that the \$6500 should have been reported in the 42 Day Pre-General report as unpaid debt.

3. Again, reported based on when the check cleared the bank rather than invoice and check date.

4. and 5. These exceptions in your letter mentioned expenditures to Walmart. Only one expenditure cleared the bank on September 18th in the amount of \$107.43. There was a data entry error on the report; only one transaction cleared the account.

6. Data entry error on the report of \$26.68 charge. Only one transaction cleared the bank account and all the unspent funds were returned to the Ethics Commission.

7. WAGM sent the campaign (an extra and forgotten) production invoice of \$12.11 on Dec. 6 that should have been sent along with their fee for advertising of \$10,030 which was reported on the 11-day pre-general report. I paid them \$12.11 by campaign check on Dec. 6 and reported the expenditure, but WAGM failed to clear it with the bank before the account was closed later that month and funds had been returned to Ethics.

## Regarding the Black Amp White transaction (which was investigated and determined by the bank to be fraudulent), this charge was not reported or claimed by the campaign as it had nothing to do with the campaign. If the bank is unable to recoup the funds, I will make every effort to make sure this money is refunded to the State.

Let me know if you have any other questions.

Respectfully,

Sue Bernard

This communication will also be sent via USPS.

May 16, 2025

Hon. William Raymond Bridgeo  
100 Fairview Avenue  
Augusta, ME 04330

Subject: 2024 Campaign Compliance Report

Dear Rep. Bridgeo:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exception. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
Runyon Kersteen Ouellette  
Email: [jconners@rko-cpas.com](mailto:jconners@rko-cpas.com)

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

**Maine Clean Election Act Compliance Report  
Candidate: William Raymond Bridgeo**

**May 15, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate William Bridgeo, for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of William Bridgeo for the House of Representatives for which MCEA funds were used. There was one exception reported and no findings, which is enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were twenty-two transactions on the candidate's bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date, except as follows:

**Exception:** On the 11-Day Pre-General report, the candidate reported an expenditure to UPS for \$38.96, dated September 24, 2024. However, per review of the invoice, the date of the invoice was September 12, 2024. Therefore, the expenditure should have been reported on the 42-Day Pre-General report, which has a reporting period of July 17, 2024 through September 17, 2024.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of cancelled checks for all payments made by check for selected disbursements; the rest of the disbursements, which were made by check or debit, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

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**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the two disbursements selected for testing, both were supported by third party documentation. We reviewed all reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. In addition, there were no additional contributions received after the candidate's certification.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated December 12, 2024 in the amount of \$3,406.23 brought the balance in the campaign bank account to \$0.00, with the exception of the balance used to maintain the bank account. The disbursement occurred within the forty-two day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

Commissioners  
Page 3

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Aminy Kristen Ouellette". The signature is written in a cursive, flowing style.

May 15, 2025  
South Portland, Maine



September 12, 2025

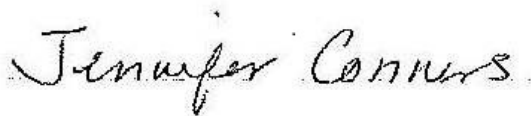
Hon. Stephan Bunker  
404 Bailey Hill Road  
Farmington, ME 04938

Subject: 2024 Campaign Compliance Report

Dear Rep. Bunker:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures. You will note that the report identifies no exceptions in your reporting procedures.

Thank you for your cooperation during the review process.

A handwritten signature in dark ink that reads "Jennifer Connors". The signature is written in a cursive, flowing style.

Jennifer Connors, CPA  
RUNYON KERSTEEN OUELLETTE

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

**Maine Clean Election Act Compliance Report  
Candidate: Stephan Bunker**

**September 11, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Stephan Bunker for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Stephan Bunker for the House of Representatives for which MCEA funds were used. No exceptions or reporting deficiencies were noted in our review.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were twenty-five transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of checks for those payments made by check and the rest of the disbursements, which were made by debit card or electronic payment, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** The one vendor disbursement selected for testing was supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the MCEA.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. All seed money contributions were within the allowable threshold and were from individuals. In addition, there were no additional contributions received after the candidate's certification.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated December 16, 2024, in the amount of \$1,614.37 brought the balance in the campaign bank account to zero. The disbursement occurred within the forty-two-day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remya Kristen Ouellette". The signature is written in a cursive, flowing style.

September 11, 2025  
South Portland, Maine

September 5, 2025

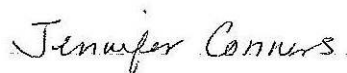
Ms. Nicole Collins  
503 Main Street  
Reed Plt, ME 04497

Subject: 2024 Campaign Compliance Report

Dear Ms. Collins:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures. You will note that the report identifies no exceptions in your reporting procedures.

Thank you for your cooperation during the review process.



Jennifer Conners, CPA  
Runyon Kersteen Ouellette

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

**Maine Clean Election Act Compliance Report  
Candidate: Nicole Collins**

**July 3, 2025**

## **INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Nicole Collins for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Nicole Collins for the House of Representatives for which MCEA funds were used. No exceptions or reporting deficiencies were noted in our review.

Specific procedures and results are described below:

***Procedure:*** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

***Result:*** There were ten transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date.

***Procedure:*** Reviewed all selected disbursements and ensured there was proof of payment.

***Result:*** We obtained copies of cancelled checks for all payments made by check; the rest of the disbursements, which were made by ACH, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

***Procedure:*** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.



**Result:** One vendor disbursement was selected for testing and was supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the MCEA.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** There were no Seed Money contributions reported and all deposits were properly reported as MCEA funds.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated December 17, 2024, in the amount of \$1,438.00 brought the balance in the campaign bank account to zero, with the exception of a balance used to maintain the account. The disbursement occurred within the forty-two-day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

Commissioners  
Page 3

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remy Kristen Ouellette". The signature is written in a cursive, flowing style.

July 3, 2025  
South Portland, Maine

June 16, 2025

Ms. Corinna Cole  
66 Kennebec Drive  
Lebanon, ME 04027

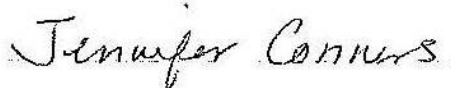
Subject: 2024 Campaign Compliance Report

Dear Ms. Cole:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exceptions. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
Runyon Kersteen Ouellette  
Email: [jconnors@rko-cpas.com](mailto:jconnors@rko-cpas.com)

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

**Maine Clean Election Act Compliance Report  
Candidate: Corinna Cole**

**May 15, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Corinna Cole for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Corinna Cole for the House of Representatives for which MCEA funds were used. There were two exceptions reported and no findings, which are enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were twenty-four transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date, except as follows:

**Exceptions:** On the 42-Day Post-General report, the candidate reported two expenditures: one to PrintSource for \$164.80, and one to Blair Candy for \$154.12, both dated October 24, 2024. However, per review of the bank statement, the disbursements cleared the bank account on October 21, 2024 per the description of the transactions. Therefore, the expenditures should have been reported on the 11-Day Pre-General report, which has a reporting period of September 18, 2024 through October 22, 2024.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We were able to verify through review of bank statements any electronic payments made for selected disbursements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the two vendor disbursements selected for testing, both were supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. All seed money contributions were within the allowable threshold and were from individuals. In addition, there were no additional contributions received after the candidate's certification.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated December 17, 2024 in the amount of \$2,513.33 brought the balance in the campaign bank account to zero. The disbursement occurred within the forty-two day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remya Kristen Ouellette". The signature is written in a cursive, flowing style.

May 15, 2025  
South Portland, Maine

May 16, 2025

Mr. Kevin Gregory Freeman  
145 Academy Street  
Presque Isle, ME 04769

Subject: 2024 Campaign Compliance Report

Dear Mr. Freeman:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exception. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
Runyon Kersteen Ouellette  
Email: [jconners@rko-cpas.com](mailto:jconners@rko-cpas.com)



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

**Maine Clean Election Act Compliance Report  
Candidate: Kevin Gregory Freeman**

**May 15, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures noted below for House of Representatives candidate Kevin Freeman, which were agreed to by the Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission), solely to assist the Commissioners and staff in ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below, either for the purpose for which this report has been requested or for any other purpose.

We reviewed the transactions for the 2024 campaign of Kevin Freeman for the House of Representatives for which MCEA funds were used. There was one exception reported and no findings, which is enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were twenty transactions on the candidate's bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date, except as follows:

**Exception:** On the 11-Day Pre-General report, the candidate reported an expenditure to Capitol Promotions for \$1,314.50, dated September 20, 2024. However, per review of the invoice, the date of the invoice was September 17, 2024. Therefore, the expenditure should have been reported on the 42-Day Pre-General report, which has a reporting period of July 17, 2024 through September 17, 2024.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained receipts for reimbursements and checks for selected disbursements; the rest of the disbursements, which were made by check, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

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**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the two disbursements selected for testing, both were supported by third party documentation. We reviewed all reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. In addition, there were no additional contributions received after the candidate's certification.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated December 11, 2024 in the amount of \$3.45 brought the balance in the campaign bank account to \$0.00. The disbursement occurred within the forty-two day threshold.

We were engagement by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

Commissioners  
Page 3

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical required related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Commissioners and staff of the Maine Ethics Commission and is not intended to be and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Amyn Kristen Ouellette". The signature is written in a cursive, flowing style.

May 15, 2025  
South Portland, Maine

August 4, 2025

Mr. Dale C. Harmon  
19 Chesebro Lane  
East Boothbay, ME 04544

Subject: 2024 Campaign Compliance Report

Dear Mr. Harmon:

Enclosed please find the final report concerning the review of your 2024 Senate campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exceptions. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
Runyon Kersteen Ouellette

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

**Maine Clean Election Act Compliance Report  
Candidate: Dale Harmon**

**July 3, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for Senate candidate Dale Harmon, for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Dale Harmon for the Senate for which MCEA funds were used. There were two exceptions reported and no findings, which are enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were twenty-six transactions on the candidate's bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date, except as follows:

**Exception:** The candidate reported two expenditures on the Seed Money Report of \$650.00 and \$350.00 to Spectrum Marketing on April 21, 2024. On the campaign report, the remark on the \$350.00 expenditure stated, "balance due \$1,415.36". The balance due should have been reported as an unpaid obligation on the Seed Money Report. This balance was reported as paid on May 20, 2024, on the 11-Day Pre-Primary Report.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of cancelled checks for those payments made by check; the rest of the disbursements, which were made by debit card or electronic payment, were substantiated through payment receipts and review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the three disbursements selected for testing, all were supported by third party documentation. We reviewed all of the disbursements and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the MCEA.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** The candidate purchased equipment for \$681.15 on April 22, 2024. As the expenditure was during the Seed Money reporting period, the equipment was not required to be sold.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. In addition, there were no additional contributions received after the candidate's certification.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Exception:** A disbursement dated December 27, 2024, in the amount of \$42,016.14 brought the balance in the campaign bank account to zero. The disbursement did not occur within the forty-two-day threshold, as required.



We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remya Hudson Ouellette". The signature is written in a cursive, flowing style.

July 3, 2025  
South Portland, Maine

August 4, 2025

Hon. Roland Daniel Martin  
PO Box 97  
Sinclair, ME 04779

Subject: 2024 Campaign Compliance Report

Dear Rep. Martin:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exception. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
Runyon Kersteen Ouellette

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

**Maine Clean Election Act Compliance Report  
Candidate: Roland Daniel Martin**

**June 2, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Roland Daniel Martin for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Roland Daniel Martin for the House of Representatives for which MCEA funds were used. There was one exception and no findings, which are enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were sixty-three transactions on the candidate's bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date, except as follows:

**Exception:** The candidate reported an expenditure on the Seed Money report of \$177.10 dated February 16, 2024, to USPS. However, on the campaign bank statement, the transaction was listed as a payment to Amazon.

The candidate's response to the exception has been included with this report as an attachment.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of cancelled checks for those payments made by check; the rest of the disbursements, which were made by debit card were substantiated through payment receipts and review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar Commissioners amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the four disbursements selected for testing, all were supported by third party documentation. We reviewed all reported transactions and determined there were several reimbursements for mileage. Two of those reimbursements were selected for testing and both were supported by mileage logs. In addition, all selected transactions appeared to be for allowable expenditures under the MCEA.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. All seed money contributions were within the allowable threshold and were from individuals. In addition, there were no additional contributions received after the candidate's certification.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated December 6, 2024, in the amount of \$12.32 brought the balance in the campaign bank account to zero. The disbursement occurred within the forty-two-day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended to be and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remy Huron Ouellette". The signature is written in a cursive, flowing style.

June 2, 2025  
South Portland, Maine

Roland D. Martin  
433 Martin Rd.  
PO Box 97  
Sinclair, Maine 04779

June 2, 2025

Jennifer Conners, CPA  
RKO Certified Public Accountants  
20 Long Creek Drive  
South Portland, Maine 04106-2437

Dear Ms. Conners,

Thank you for your letter dated May 27, 2025. The following is my response to the two (2) mentioned exceptions, with no findings.

Exception #1

The Campaign reported an expenditure on the Seed Money report of \$117.10 dated 2/16/24 to USPS. However, on the campaign bank statement, the transaction was listed as payment to Amazon.

Response: The expenditure was not to USPS but to Amazon for Paper and Envelopes. My error.

Sincerely,

A handwritten signature in black ink, appearing to be 'Roland D. Martin', written over a horizontal line.

Roland D. Martin

April 15, 2025

Hon. Kristi Mathieson  
26 Haley Road  
Kittery, ME 03904

Subject: 2024 Campaign Compliance Report

Dear Rep. Mathieson:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures. You will note that the report identifies no exceptions in your reporting procedures.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
RUNYON KERSTEEN OUELLETTE



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

**Maine Clean Election Act Compliance Report  
Candidate: Kristi Mathieson**

**April 13, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Kristi Mathieson for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Kristi Mathieson for the House of Representatives for which MCEA funds were used. No exceptions or reporting deficiencies were noted in our review.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were eighteen transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained receipts for check and debit card payments and were able to verify through review of bank statements any electronic payments made for selected disbursements; the rest of the disbursements, which were made by debit card or electronic payment, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the six vendor disbursements selected for testing, all were supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements were MCEA funds. There were no seed money contributions.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).


**Result:** A disbursement dated December 2, 2024 in the amount of \$262.54 brought the balance in the campaign bank account to zero. The disbursement occurred within the forty-two day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

Commissioners  
Page 3

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in cursive script that reads "Jennifer Connors". The ink is dark and the signature is written on a light background.

April 13, 2025  
South Portland, Maine

June 16, 2025

Mr. Matthew Channing Townsend  
20 Townsend Road  
Fairfield, ME 04937

Subject: 2024 Campaign Compliance Report

Dear Mr. Townsend:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exceptions. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.



Jennifer Conners, CPA  
Runyon Kersteen Ouellette  
Email: [jconners@rko-cpas.com](mailto:jconners@rko-cpas.com)

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

**Maine Clean Election Act Compliance Report  
Candidate: Matthew Channing Townsend**

**April 30, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners  
Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Matthew Channing Townsend for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Matthew Channing Townsend for the House of Representatives for which MCEA funds were used. Two exceptions and no findings were noted, which are enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were sixteen transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of cancelled checks for those payments made by check; the rest of the disbursements, which were made by debit card, were substantiated through payment receipts and review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the two disbursements selected for testing, both were supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Exception:** The candidate was not able to provide supporting documentation for the seed money contributions. Therefore, we were unable to verify that all seed money amounts were contributed by individuals up to the allowable threshold.

The candidate's response to this exception has been included with this report as an attachment.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Exception:** A disbursement dated December 26, 2024 in the amount of \$1,671.51 brought the balance in the campaign bank account to zero. The disbursement did not occur within the forty-two-day threshold, as required.

The candidate's response to this exception has been included with this report as an attachment.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.



We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended to be and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remya Kristen Ouellette". The signature is written in a cursive, flowing style.

April 30, 2025  
South Portland, Maine

**From:** Matthew Townsend  
**Sent:** Wednesday, April 30, 2025

Ms. Conners,

I am responding to the letter dated April 15, 2025 regarding the audit of my campaign.

Finding number one, the seed money did not have supporting documentation. I filled out the form on the campaign finance site instead of filling out a separate spreadsheet. It seemed redundant. All donors were documented accurately so that if additional information such as cancelled checks was needed it could be retrieved. There did not seem to be any recommendation on this issue at the time, and I did not want copies of checks with account information circulating.

Finding number two, the repayment of funds. is a simple oversight. The proper forms were filed on time, but I did not know that funds needed to be returned no later than the date of the final report date. There was an issue with the tracking online vs. my bank balance (bank balance was larger as the online accounting counted one amount twice). In the end the full amount was returned shortly after the date with accumulated interest.

Thank you for your time,

Matt Townsend

May 16, 2025

Hon. Julia A. G. McCabe  
26 Davis Street #2  
Lewiston, ME 04240

Subject: 2024 Campaign Compliance Report

Dear Rep. McCabe:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures. You will note that the report identifies no exceptions in your reporting procedures.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
RUNYON KERSTEEN OUELLETTE

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

**Maine Clean Election Act Compliance Report  
Candidate: Julie McCabe**

**May 15, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Julia McCabe for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Julia McCabe for the House of Representatives for which MCEA funds were used. No exceptions or reporting deficiencies were noted in our review.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were forty-six transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of checks and the rest of the disbursements, which were made by debit card or electronic payment, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the five vendor disbursements selected for testing, all were supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** The candidate purchased equipment for \$331.25 on March 26, 2024 and \$383.99 on April 8, 2024. As the purchases were made during the Seed Money reporting period, the equipment was not required to be sold.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. All seed money contributions were within the allowable threshold and were from individuals. In addition, there were no additional contributions received after the candidate's certification.

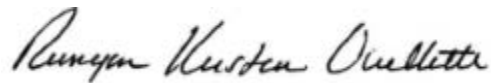
**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated September 5, 2024 in the amount of \$4,908.00 and a disbursement dated November 18, 2024 in the amount of \$8.21 brought the balance in the campaign bank account to zero. The disbursements occurred within the forty-two day threshold as required.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in dark ink, reading "Remy K. Ouellette". The signature is written in a cursive, flowing style.

May 15, 2025  
South Portland, Maine

April 17, 2025

Mr. Robert Charles Meyer  
6 Old Stage Lane  
Searsport, ME 04974

Subject: 2024 Campaign Compliance Report

Dear Mr. Meyer:

Enclosed please find the final report concerning the review of your 2024 Senate campaign contributions and expenditures. You will note that the report identifies no exceptions in your reporting procedures.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
RUNYON KERSTEEN OUELLETTE



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

**Maine Clean Election Act Compliance Report  
Candidate: Robert Meyer**

**April 15, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for Senate candidate Robert Meyer for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Robert Meyer for the Senate for which MCEA funds were used. No exceptions or reporting deficiencies were noted in our review.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were thirty transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of canceled checks for those payments made by check and were able to verify through review of bank statements any electronic payments made for selected disbursements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the two vendor disbursements selected for testing, both were supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. No seed money contributions were reported. In addition, there were no additional contributions received after the candidate's certification.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated November 26, 2024 in the amount of \$441.35 brought the balance in the campaign bank account to zero. The disbursement occurred within the forty-two day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

Commissioners  
Page 3

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in cursive script that reads "Jennifer Connors". The ink is dark and the signature is written in a fluid, connected style.

April 15, 2025  
South Portland, Maine

September 9, 2025

Hon. Timothy E. Nangle  
20 Tanglewood Lane  
Windham, ME 04062

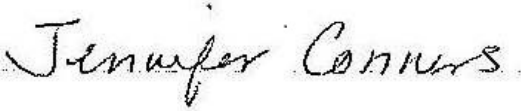
Subject: 2024 Campaign Compliance Report

Dear Sen. Nangle:

Enclosed please find the final of our report concerning the review of your 2024 Senate campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exception. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
Runyon Kersteen Ouellette  
Email: [jconnors@rko-cpas.com](mailto:jconnors@rko-cpas.com)

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

**Maine Clean Election Act Compliance Report  
Candidate: Timothy E. Nangle**

**August 2, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for Senate candidate Timothy Nangle for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of candidate Timothy Nangle for the Senate for which MCEA funds were used. There was one exception and no findings, which is enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were forty-seven transactions on the candidate's bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date, except as follows:

**Exception:** On the 11-Day Pre-General report, the candidate reported an expenditure to JVA Campaigns for \$12,527.50, dated September 27, 2024. However, per review of the invoice, the date of the invoice was September 5, 2024, and the payment cleared the bank on September 9, 2024. Therefore, the expenditure should have been reported on the 42-Day Pre-General report, which has a reporting period of July 17, 2024, through September 17, 2024.

The candidate's response to the exception has been included with this report as an attachment.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained receipts for reimbursements and checks for selected disbursements; the rest of the disbursements, which were made by debit card or electronic payment, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

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**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the eleven disbursements selected for testing, all were supported by third party documentation. We reviewed all reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the MCEA.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. All seed money contributions were within the allowable threshold and were from individuals. In addition, there were no additional contributions received after the candidate's certification.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated November 21, 2024, in the amount of \$3.25 brought the balance in the campaign bank account to zero. The disbursement occurred within the forty-two-day threshold.



We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remy Kristen Ouellette". The signature is written in a cursive, flowing style.

August 2, 2025  
South Portland, Maine

# Timothy Nangle

September 8<sup>th</sup>, 2025

Jennifer Conners, CPA  
Runyon Kersteen Ouellette  
20 Long Creek Drive  
South Portland, ME 04106

Dear Ms. Conners,

In regard to the error on my entry of the expenditure of \$12,527.50 to JVA Campaigns on 9/27/2024.

After the reporting period ended my campaign assistant and I were doing an audit of my bank account, invoices and campaign finance documents it was discovered that I had not entered the expenditure on the date of the final decision to move forward with that expenditure.

I entered the expenditure on the date that it was discovered and unfortunately – I did not enter it in the appropriate reporting period. I was unsure on how to enter it for a previous date on the campaign finance website. Looking back now, I should have called to request assistance of the ethics staff at that time.

I sincerely apologize for the oversight and will ensure future reporting is done within the appropriate filing reports. I am unable to log into my campaign finance account but as soon as I am able, I would be happy to revise the report.

Thank you

/s/ Timothy Nangle

Timothy Nangle

[Nangleformaine@gmail.com](mailto:Nangleformaine@gmail.com)

September 9, 2025

Hon. Jeffrey K. Pierce  
PO Box 51  
Dresen, ME 04342

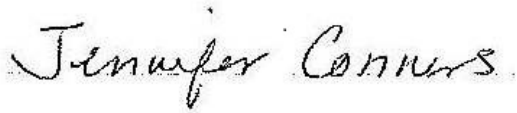
Subject: 2024 Campaign Compliance Report

Dear Rep. Pierce:

Enclosed please find the final review of our report concerning the review of your 2024 Senate campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exception. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.

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

Jennifer Conners, CPA  
Runyon Kersteen Ouellette  
Email: [jconners@rko-cpas.com](mailto:jconners@rko-cpas.com)

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

**Maine Clean Election Act Compliance Report  
Candidate: Jeffrey Pierce**

**August 4, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for Senate candidate Jeffrey Pierce for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Jeffrey Pierce for the Senate for which MCEA funds were used. There were three exceptions and no findings, which are enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were fifty-one transactions on the candidate's bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date, except as follows:

**Exception:** The candidate reported an expenditure on the 42-Day Pre-General report of \$20.56 dated September 12, 2024, to Spectrum Marketing. However, the September 2024 campaign bank statement reported the expenditure was paid to Staples. Therefore, the transaction was reported by the incorrect vendor name.

**Exception:** The candidate reported an expenditure on the 11-Day Pre-General Report of \$1,224.49 dated September 25, 2024, to Spectrum Marketing for envelopes, packaging and shipping. The invoice for this purchase was dated August 22, 2024. This transaction should have been reported as an unpaid obligation on the 42 Day Pre-General report, which has a reporting period of July 17, 2024, to September 17, 2024.

**Exception:** The candidate reported an expenditure on the 11 Day Pre-General report of \$21.09 dated September 20, 2024, to Spectrum Marketing. However, the September 2024 campaign bank statement reported the expenditure was paid to Staples. Therefore, the transaction was reported by the incorrect vendor name.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of cancelled checks for those payments made by check; the rest of the disbursements, which were made by debit card, were substantiated through payment receipts and review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the nine disbursements selected for testing, all were supported by third party documentation. We reviewed all reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the MCEA.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. All seed money contributions were within the allowable threshold and were from individuals. In addition, there were no additional contributions received after the candidate's certification.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated November 23, 2024, in the amount of \$307.68 brought the balance in the campaign bank account to zero. The disbursement occurred within the forty-two-day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the specific elements, accounts, or items. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended to be and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remy Kristen Ouellette". The signature is written in a cursive, flowing style.

August 4, 2025  
South Portland, Maine

April 15, 2025

Hon. Edward Joseph Polewarczyk  
67 Young's Point Road  
Wiscasset, ME 04578

Subject: 2024 Campaign Compliance Report

Dear Rep. Polewarczyk:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures. You will note that the report identifies no exceptions in your reporting procedures.

Thank you for your cooperation during the review process.



Jennifer Conners, CPA  
RUNYON KERSTEEN OUELLETTE



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

**Maine Clean Election Act Compliance Report  
Candidate: Edward Polewarczyk**

**April 13, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Edward Polewarczyk for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Edward Polewarczyk for the House of Representatives for which MCEA funds were used. No exceptions or reporting deficiencies were noted in our review.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were twenty-one transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of checks and the rest of the disbursements, which were made by debit card or electronic payment, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the five vendor disbursements selected for testing, all were supported by third party documentation. We reviewed all of the reported transactions and determined there were four reimbursements for mileage, all of which were supported by mileage logs. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. All seed money contributions were within the allowable threshold and were from individuals. In addition, there were no additional contributions received after the candidate's certification.


**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated November 19, 2024 in the amount of \$5,700.34 brought the balance in the campaign bank account to zero. The disbursement occurred within the forty-two day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in cursive script that reads "Jennifer Connors". The ink is dark and the signature is written in a fluid, connected style.

April 13, 2025  
South Portland, Maine

June 16, 2025

Ms. Samantha Phyllis Paradis  
896 Main Street  
Caribou, ME 04736

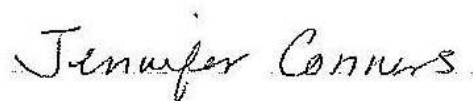
Subject: 2024 Campaign Compliance Report

Dear Ms. Paradis:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exception. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
Runyon Kersteen Ouellette  
Email: [jconnors@rko-cpas.com](mailto:jconnors@rko-cpas.com)

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

**Maine Clean Election Act Compliance Report  
Candidate: Samantha Phyllis Paradis**

**May 5, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Samantha Paradis for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of candidate Samantha Paradis for the House of Representatives for which MCEA funds were used. There was one exception and no findings, which is enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were thirteen transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date, except as follows:

**Exception:** On the 11-Day Pre-General report, the candidate reported an expenditure to Frame Media Strategies for \$3,830.96, dated September 23, 2024, which is the date the payment cleared the bank. However, per review, we noted the date of the invoice was September 12, 2024. Therefore, the expenditure should have been reported on the 42-Day Pre-General report, which has a reporting period of July 17, 2024 through September 17, 2024.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

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**Result:** We obtained receipts for reimbursements and checks for selected disbursements; the rest of the disbursements, which were made by debit card or electronic payment, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the three disbursements selected for testing, all were supported by third party documentation. We reviewed all reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** There were no deposits identified on the campaign bank statements that were not MCEA funds. There were no seed money contributions.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** All MCEA funds were spent by the campaign and therefore, there were no funds remaining to be returned to the Commission.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.



Commissioners  
Page 3

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remya Kristen Ouellette". The signature is written in a cursive, flowing style.

May 5, 2025  
South Portland, Maine

April 17, 2025

Hon. Daniel R. Sayre  
75 Summer Street  
Kennebunk, ME 04043

Subject: 2024 Campaign Compliance Report

Dear Rep. Sayre:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures. You will note that the report identifies no exceptions in your reporting procedures.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
RUNYON KERSTEEN OUELLETTE

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

**Maine Clean Election Act Compliance Report  
Candidate: Daniel Sayre**

**April 15, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Daniel Sayre for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Daniel Sayre for the House of Representatives for which MCEA funds were used. No exceptions or reporting deficiencies were noted in our review.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were twenty-five transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of canceled checks for those payments made by check and the rest of the disbursements, which were made by debit card or electronic payment, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the two vendor disbursements selected for testing, both were supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements were MCEA funds. There were no seed money contributions.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated December 17, 2024 in the amount of \$234.56 brought the balance in the campaign bank account to zero. The disbursement occurred within the forty-two day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in cursive script that reads "Jennifer Connors". The ink is dark and the signature is written in a fluid, connected style.

April 15, 2025  
South Portland, Maine

June 16, 2025

Mr. Scott Douglas Williams  
1261 Brunswick Avenue  
Gardiner, ME 04345

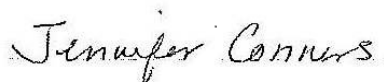
Subject: 2024 Campaign Compliance Report

Dear Mr. Williams:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exceptions. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
Runyon Kersteen Ouellette  
Email: [jconnors@rko-cpas.com](mailto:jconnors@rko-cpas.com)

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

**Maine Clean Election Act Compliance Report  
Candidate: Scott Williams**

**May 7, 2025**



**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Scott Williams for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Scott Williams for the House of Representatives for which MCEA funds were used. There were three exceptions and no findings, which are enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were ten transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date, except as follows:

**Exception:** The candidate reported an expenditure on the 11 Day Pre-General Report of \$535 dated September 19, 2024 to Spectrum. However, the invoice for the expenditure was dated August 19, 2024. The transaction should have been reported as an unpaid debt on the 42 Day Pre-General Report, which has a reporting period of July 17, 2024 through September 17, 2024.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** All disbursements were made by debit card or electronic payment and were substantiated through review of the bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** The three disbursements selected for testing were supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements were MCEA funds. There were no seed money contributions.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Exceptions:** Two withdrawals dated October 31, 2024 and January 2, 2025 in the amounts of \$15.60 and \$201, respectively, brought the balance in the campaign bank account to zero. Although the \$15.60 was withdrawn on October 31<sup>st</sup>, that amount was not returned until after the 42-day threshold with a check dated January 17, 2025. In addition, the return of the \$201 was dated January 2, 2025 and was also after the 42-day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remya Kristen Ouellette". The signature is written in a cursive, flowing style.

May 7, 2025  
South Portland, Maine

May 16, 2025

Hon. Holly Beth Stover  
71 Dover Road  
Boothbay, ME 04537

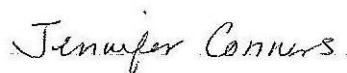
Subject: 2024 Campaign Compliance Report

Dear Rep. Stover:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exception. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.



Jennifer Conners, CPA  
Runyon Kersteen Ouellette  
Email: [jconners@rko-cpas.com](mailto:jconners@rko-cpas.com)

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

**Maine Clean Election Act Compliance Report  
Candidate: Holly Stover**

**May 15, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Holly Stover for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Holly Stover for the House of Representatives for which MCEA funds were used. There was one exception and no findings, which is enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were fifteen transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date, except as follows:

**Exception:** The candidate reported the following expenditures on the 42 Day Pre-General Report for advertising, dated September 12, 2024, for a total of \$8,393:

- Frame Media Strategies of \$1,250,
- Frame Media Strategies of \$5,643,
- Stack Adapt for \$1,500.

In addition, the candidate reported an expenditure of \$1,000 on the Seed Money Report, dated April 21, 2024, which was a deposit for the related services.

The candidate paid for these advertising services by two checks: one dated April 21, 2024 for \$1,000, and another for \$7,393 dated October 24, 2024. Therefore, the total amounts paid to Frame Media Strategies and the total invoiced by the vendor was \$8,393. However, the candidate reported a total of advertising expenditures for these services of \$9,393. Therefore, the expenditures to Frame Media Strategies were over reported by \$1,000.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of checks for selected disbursements; the rest of the disbursements, which were made by debit card, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting, third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** The one disbursement selected for testing was supported by third party documentation. We reviewed all of the reported transactions and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the Maine Clean Election Act.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. In addition, there were no additional contributions received after the candidate's certification. All seed money contributions were within the allowable threshold and were from individuals.

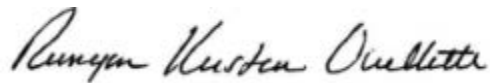
**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated December 17, 2024 in the amount of \$6,247.29 brought the balance in the campaign bank account to zero, with the exception of a balance used to maintain the account. This disbursement occurred within the forty-two day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in dark ink, reading "Amin Kustan Ouellette". The signature is written in a cursive, flowing style.

May 15, 2025  
South Portland, Maine



September 12, 2025

Ms. Colleen D. Strickler  
226 Town Farm Rd  
New Gloucester, ME 04260

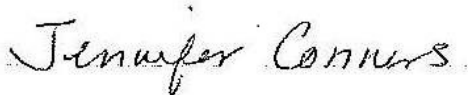
Subject: 2024 Campaign Compliance Report

Dear Ms. Strickler:

Enclosed please find the final report concerning the review of your 2024 House of Representatives campaign contributions and expenditures.

We anticipate presenting the report to the Commission in Augusta. You will be invited to appear before the Commission to discuss the exception. Jonathan Wayne, the Commission's Executive Director, will contact you beforehand to schedule your appearance.

Thank you for your cooperation during the review process.



Jennifer Connors, CPA  
RUNYON KERSTEEN OUELLETTE

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

**Maine Clean Election Act Compliance Report  
Candidate: Colleen Strickler**

**August 1, 2025**

**INDEPENDENT ACCOUNTANT'S REPORT ON  
APPLYING AGREED-UPON PROCEDURES**

Commissioners

Maine Commission on Governmental Ethics and Election Practices:

We have performed the procedures enumerated below for House of Representatives candidate Colleen Strickler for the 2024 election cycle. The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) is responsible for the review of the 2024 clean election campaigns.

The Maine Commission on Governmental Ethics and Election Practices (Maine Ethics Commission) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of ensuring that the selected candidates complied with the requirements of the Maine Clean Election Act (MCEA) for the 2024 election cycle. This report may not be suitable for any other purpose. The procedures performed may not address all items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

We reviewed the transactions for the 2024 campaign of Colleen Strickler for the House of Representatives for which MCEA funds were used. There was one exception and no findings, which is enumerated below.

Specific procedures and results are described below:

**Procedure:** Reviewed all campaign bank statements for the 2024 election cycle and ensured that the campaign finance reports submitted during the 2024 election cycle included all transactions and that all transactions were reported correctly (e.g., correct payment amount, obligation date).

**Result:** There were sixty-five transactions on the candidate's campaign bank statements. We verified that all of the transactions were included, agreed in dollar amount, and reported on the correct report based on the transaction date.

**Procedure:** Reviewed all selected disbursements and ensured there was proof of payment.

**Result:** We obtained copies of checks for selected disbursements; the rest of the disbursements, which were made by debit card or electronic payment, were substantiated through review of bank statements. Therefore, there was proof of payment for all selected disbursements.

**Procedure:** Judgmentally selected disbursements from those reported in the campaign finance reports, which in the aggregate represented at least fifty percent of the candidate's disbursements. Reviewed the selected disbursement transactions and ensured that they were substantiated by supporting third party documentation and were for allowable expenditures under the MCEA. In addition, ensured that mileage logs supported selected reimbursements for mileage and that the total mileage and dollar amount on the mileage logs recalculated based on the individual trips and the applicable reimbursement rate.

**Result:** Of the three disbursements selected for testing, all were supported by third party documentation. We reviewed all of the disbursements and determined there were no reimbursements for mileage. In addition, all selected transactions appeared to be for allowable expenditures under the MCEA, except as follows:

**Exception:** The candidate reported an expenditure on the 42-Day Pre-General Report of \$79.39 dated September 13, 2024 to USPS for postage. However, per the receipt, \$75 of the expenditure was for a money order and \$4.39 was for the money order fee and envelope. We determined through inquiry of the candidate that the \$75 was for qualified contributions. Therefore, the purpose of the expenditure was not reported correctly. Per inquiry of the candidate and the Commission, we determined that the candidate returned \$336 in qualified contributions to the Commission at the end of the campaign that were not used for supplemental payments.

The candidate's response to the exception has been included with this report as an attachment.

**Procedure:** Reviewed purchases reported on the campaign finance reports to identify any equipment purchased with MCEA funds and ensure that the equipment was sold at fair market value and that sales proceeds were returned to the Maine Ethics Commission in a timely manner.

**Result:** No purchases of equipment were reported on the campaign finance reports.

**Procedure:** Reviewed all of the campaign bank statements from the 2024 election cycle and identified all deposits that were not for MCEA funds. Ensured that the amounts were reported as seed money contributions. Reviewed supporting documentation and ensured that seed money contributions were from individuals and did not exceed the threshold of \$100 per donor. In addition, ensured that no additional contributions were received after the candidate's certification.

**Result:** All deposits identified on the campaign bank statements that were not MCEA funds were properly identified and reported as seed money contributions. In addition, there were no additional contributions received after the candidate's certification. All seed money contributions were within the allowable threshold and were from individuals.

**Procedure:** Reviewed supporting documentation to determine that the balance of MCEA funds not spent were returned to the Maine Ethics Commission and were returned promptly (within forty-two days of the election).

**Result:** A disbursement dated December 12, 2024, in the amount of \$186.66 brought the balance in the campaign bank account to zero, with the exception of a balance used to maintain the account. This disbursement occurred within the forty-two-day threshold.

We were engaged by the Maine Ethics Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the clean election campaigns. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Maine Ethics Commission and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Maine Ethics Commission and is not intended and should not be used by anyone other than these specified parties.

A handwritten signature in black ink, reading "Remy Kuster Ouellette". The signature is written in a cursive, flowing style.

August 1, 2025  
South Portland, Maine

The best I can figure is that I was sending QC's in.  
\$74 in donations  
\$2.35 for the money order  
\$2.04 for postage

I hope this clears things up...

**Colleen Strickler**