

May 26, 2026

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

Dear Mr. Wayne and Members of the Commission,

Thank you for the opportunity to review the response submitted by Counsel Anna Mackin, dated May 22, 2026, on behalf of the Robert Charles campaign regarding the midgeleyexposed.com website that was at issue in our original complaint.

The materials provided by the Charles campaign are wholly inadequate and fail to demonstrate a lack of involvement in the midgeleyexposed.com website. While the Charles campaign attempts to narrow the inquiry to a single \$50 GoDaddy reimbursement, their response notably fails to actually disprove involvement in the website at issue. It also noticeably fails to provide any original source documentation to prove their assertion.

In addition to this, the website is not working again, and on May 13th, the Charles campaign purchased therealbenmidgley.com with the same exact messaging against Ben Midgley.

It is important to note that the Charles campaign has not provided:

- Any GoDaddy account records that are on his finance reports showing all domain purchases made during the relevant period;
- Any invoices, receipts, or payment logs submitted to the Charles campaign for reimbursement, excluding the possibility that another campaign vendor, employee, contractor, or associated entity purchased the domain;
- Any sworn testimony from campaign staff beyond Harris Media who surely knew about the website's existence, and shared screenshots of its content with close supporters online;

Instead, the campaign relies entirely on an affidavit from Vincent Harris saying Harris Media did not purchase the domain through its GoDaddy account, despite failing to show any records from the Harris Media GoDaddy account to prove this.

The website at issue directly mirrors and amplifies messages publicly used by Robert Charles and his allies. In fact, no other campaign to my knowledge is engaged in this line of attack against Ben Midgley. In fact, on August 4, 2025, Robert Charles used this line of attack against Ben Midgley in a press release the day before Ben Midgley launched his campaign. (Appendix A). That same content was used months in advance of this website, and the similarities are too close to ignore. I cannot underscore the point enough: the website content closely tracked rhetoric used directly by Robert Charles on social media, and his closest allies and supporters prior to anyone knowing about the website.

Additionally, the timing and surrounding circumstances remain highly concerning:

- The domain midgeleyexposed.com was registered on March 26, 2026 through GoDaddy.
- On that same date, the Charles campaign reported a \$50 reimbursement to Harris Media explicitly labeled "WEB - Website costs/Reimburse Harris Media for GoDaddy."

- The Charles Campaign states this was for another website domain purchased on February 10, 2026 but they have not provided documentation to prove this fact.
- The website was then abruptly removed after public scrutiny tied it to the Charles campaign.
- Another website domain was purchased on May 13, 2026 which remains active called therealbenmidgley.com which used almost identical messaging.
- Vincent Harris failed to deny involvement in the website in media reports outlined in or previous complaint.
- The disclaimer on the midgeleyexposed.com website was updated to reflect mention of the BDN report in which Vincent Harris was quoted.

The campaign's response does not adequately explain these overlapping facts. Instead, it asks the Commission to accept a limited denial regarding one transaction, while failing to provide any documentation to prove their argument.

If the Charles campaign truly had no involvement, it would presumably be capable of providing substantially more comprehensive documentation to eliminate any reasonable concern regarding coordination or authorization. It would provide the Ethics Commission access to their GoDaddy account. The refusal to do so, and the absence of such evidence is notable.

This matter is not resolved merely because the campaign identified an alternative domain purchase. The question before the Commission is whether the website constituted a coordinated political communication that failed to properly disclose its true sponsor under 21-A M.R.S. §1014. On that issue, the Charles campaign has not carried its burden of rebutting the substantial circumstantial evidence already presented.

Due to the lack of documentation from the Charles campaign, we respectfully request the Commission continue its investigation and seek additional records sufficient to determine that the Charles campaign had no role in this website. It is our position that the documentation provided fails to meet this test. The Commission has the authority to request who created the website from GoDaddy.com, and we respectfully request that that action be taken.

As previously held, the Maine Ethics Commission has the authority to determine who made the expenditure under Maine law.

Thank you for your continued attention to this matter and your commitment to ensure transparency and integrity in Maine elections.

Sincerely,

Lauren LePage
Campaign Manager
Midgley for Governor