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

To: Commission

From: Jonathan Wayne

Date: June 8, 2026

Re: June 6, 2026 Text Messages by VoteRise

In Maine, text messages sent with the assistance of mass distribution technology that expressly advocate for the election or defeat of a candidate must clearly state the name of the person who made or financed the expenditure for the text messages. On Saturday, June 6, 2026, some Maine voters received text messages urging support for a "slate" of candidates that included Hannah Pingree, Shenna Bellows, and Troy Jackson. The Nirav Shah for Governor campaign asserted that the text messages did not clearly and conspicuously state the name of the person who made or financed the expenditure for the texts.

The Shah campaign also questioned whether the people responsible for the texts should have registered and filed campaign finance reports as a PAC or filed independent expenditure reports with the Commission. The threshold for qualifying as a PAC is receiving contributions or making expenditures greater than $2,500 in a year to influence state candidate elections in Maine. The threshold for filing an independent expenditure report is spending more than $1,000 per candidate on a communication to voters advocating for or against candidates.

Prior to the meeting, Mr. Wayne connected with the treasurer and counsel for VoteRise, a PAC registered with the Federal Election Commission (FEC). They confirmed VoteRise was responsible for the June 6th text messages. The texts did not explicitly say they were paid for by VoteRise, but the texts included www.vote-rise.com in a URL within the text and concluded "– VR."

LEGAL REQUIREMENTS

Required Identification of Spender in Express Advocacy Text Messages

Title 21-A, section 1014 requires certain communications to voters advocating for or against candidates to identify who paid for them. Subsection 1014(5-A) applies to text messages:

> Text messages sent with the assistance of mass distribution technology that is paid for by a person must clearly and conspicuously state the name of the person who made or financed the expenditure if:
>
> A. The text message expressly advocates the election or defeat of a candidate; or
>
> B. The text message contains a link to a website that expressly advocates the election or defeat of a candidate.

21-A M.R.S. § 1014(5-A). A violation of § 1014 may result in a civil penalty of up to the amount of the expenditure in violation. § 1014(4).

Definition of Political Action Committee

A PAC includes, in part: "Any person, including any corporation or association, other than an individual, that receives contributions or makes expenditures aggregating more than $2,500 in a calendar year for the purpose of influencing the nomination or election of any candidate to political office." 21-A M.R.S. § 1052(5)(A)(1).

Requirement to Register and Exceptions for Out-of-State Committees

Maine Election Law contains a separate subsection applicable to organizations registered as a political committee in other jurisdictions. A PAC that is registered with the FEC shall register and file reports with the Commission upon receiving contributions or making expenditures to influence a campaign in Maine in excess of the $2,500 threshold. 21-A M.R.S. § 1053-B.

Definition of Expenditure

The term "expenditure" includes "a purchase, payment, distribution, loan, advance, deposit or gift of money anything of value made for the purpose of initiating or influencing a campaign," and "a contract, promise, or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure for the purposes set forth in this paragraph." 21-A M.R.S. §§ 1052(4)(A)(1)&(2).

Definition of Contribution

The term "contribution" includes, in part: "A gift, subscription, loan, advance or deposit of money or anything of value made to or received by a committee for the purpose of initiating or influencing a campaign." 21-A M.R.S. § 1052(3)(A).

Definition of In-Kind Contribution

Maine's campaign finance statutes do not define "in-kind contribution" but the Commission's rules contain two provisions defining what is an in-kind contribution:

> "In-kind contribution" means any gift, subscription, loan, advance or deposit of anything of value other than money made for the purpose of influencing the nomination or election of any person to political office or for the initiation, support or defeat of a ballot question.

94-270 Code of Maine Rules ch. 1, § 1(12).

> Unless specifically exempted under 21-A M.R.S. §§ 1012 & 1052 or this section, the provision of any goods or services without charge or at a charge that is less than the usual and customary charge for such goods or services is an in-kind contribution. Examples of such goods and services include, but are not limited to: equipment, facilities, supplies, personnel, advertising, and campaign literature. If goods or services are provided at less than the usual and customary charge, the amount of the in-kind contribution is the difference between the usual and customary charge and the amount charged the candidate or political committee.
>
> > A. A commercial vendor that has provided a discount to a candidate or political committee because of a defect in performance or other business reason has not made a contribution if the vendor grants substantially similar discounts to other customers in the ordinary course of the vendor's business.
> >
> > B. If a candidate is a public official who is provided a vehicle for transportation by a public entity for the purpose of conducting official duties,

> the use of such vehicle for campaign purposes is considered to be an in-kind contribution to the candidate from the public entity unless the candidate reimburses the public entity for the use of the vehicle.

94-270 Code of Maine Rules ch. 1, § 6(4).

Independent Expenditure Reporting

An independent expenditure is an expenditure to design, produce or disseminate a public communication to voters that expressly advocates the election or defeat of a clearly identified candidate, when the expenditure is not made in cooperation, consultation or concert with, or at the request or suggestion of, a candidate, a candidate's authorized political committee or their agents. 21-A M.R.S. § 1019-B(1)(A). When a person makes an independent expenditure in excess of $1,000 per candidate, it is required to file an independent expenditure report with the Commission in accordance with a schedule in the Commission's rules. 21-A M.R.S. § 1019-B(4). Under the Commission's rules, during the last 13 days before a primary election, an independent expenditure report must be filed within one calendar day of making the expenditure for the communication. 94-270 Code of Maine Rules ch. 1, § (10)(3)(B)(3).

FACTUAL BACKGROUND

The complaint filed by the Shah campaign contains an image of the June 6th text messages. The messages include a graphic that looks like a news headline from a Portland TV station and a photo of the three candidates. A caption within the graphic reads: "The slate have been champions on issues such as marriage equality, labor issues and other progressive causes." Below that graphic is language containing the following call to action and hyperlink:

> Stand with the slate for a better Maine. Troy Jackson, Hannah Pingree and Shenna Bellows have cross-endorsed each other in next week's Dem primary for Governor. Have a favorite? Rank them #1. Then rank the other two #2 and #3. That's how all three asked Mainers to vote, and it's how you make your ballot count next Tuesday, June 9th.
>
> Full story here: https://vote-rise.com/meBN1?id=TRQU - VR, stop to end

According to the Shah campaign, after a user clicks on the link, the user's browser opens briefly to a webpage within the domain www.vote-rise.com and is then redirected to a news article on the Maine Public website about Troy Jackson, Hannah Pingree, and Shenna Bellows announcing support for each other through ranked-choice voting.

Commission's June 9, 2025 meeting. After the Commission received the Shah campaign's June 6th complaint, the Commission met on Tuesday, June 9th. Newell Augur, counsel for the Shah campaign said, in summary:

> The Shah campaign echoes the concerns expressed by Commission Counsel and staff concerning the disclosure of VoteRise's name in the June 6th texts. The disclosure of the name is hidden or at least unclear. Independent expenditure communications costing more than $1,000 per candidate require reporting within 24 hours of when a PAC commits to making the expenditure, not when the communication is sent. Many people associated with the Shah campaign received the June 6th texts, which leads the Shah campaign to estimate conservatively that 30,000 - 50,000 people received the June 6th texts. Many fundraising firms charge 10 - 12 cents per text. Even if VoteRise was charged only six cents per text, that would put VoteRise over the $1,000 independent expenditure reporting threshold. A campaign of text messages could entail costs for other services such as preparing the copy for the texts, determining the audience of voters, *etc.* The Shah campaign argues that if the Commission determines VoteRise was required to file an independent expenditure report, it should file the report now.

Mr. Dayne Lee, counsel for VoteRise responded, in summary:

> VoteRise apologizes that the Commission needed to meet on an expedited basis. With regard to the disclosure in the text messages, VoteRise is a federal committee. Different standards apply in different states, which isn't an excuse for not meeting Maine's standards. VoteRise believed, as is the practice in other states, that having its full name within the text and the initials VR was sufficient. After talking to Mr. Wayne, the disclosure in the second round of texts sent on Monday, June 8 was "Paid for by VoteRise." If the disclosure in the June 6th texts was insufficient, VoteRise apologizes. The costs charged by VoteRise's vendor are quite low and different than Mr. Augur described. VoteRise spent $702 for the July 6 texts. It sent a second round of texts with the correct disclosure on Monday, July 8, but has not received the bill for that round. VoteRise expects to send a third round of texts on

July 9th. The total cost will be around under $2,000. VoteRise is meeting its obligations under Maine law. Its expenditures will be reported in its next quarterly report filed with the FEC.

Commission staff's request for information. Later in the day on June 9th, the Commission staff emailed a letter to Dayne Lee requesting: (1) a list of expenditures made to support or oppose candidates in the June 9, 2026 primary election; (2) bank documentation for those payments; and (3) confirmation of whether VoteRise coordinated with the candidates or their campaigns. The deadline for submission of the information was June 19, 2026.

STAFF COMMENTS ON OPTIONS FOR THE JUNE 24, 2026 MEETING

Potential disclosure statement violation. The Commission staff expects that at the June 24, 2026 meeting, the Commission will have received sufficient information to determine whether VoteRise violated 21-A M.R.S. § 1014(5-A) by not clearly and conspicuously stating in the June 6th text messages the name of the person that made or financed the expenditure for the texts. If a violation is found, a penalty may be assessed of up the amount of the expenditure for the texts. § 1014(4).

Registering as a PAC; filing independent expenditure reports. At the June 9th meeting, counsel for the Shah campaign offered an estimate of how many texts were sent and suggested that the economic value of these texts far exceeded the $1,000-per-candidate and $2,500 thresholds for independent expenditure reporting and PAC registration. Counsel for VoteRise said its costs were quite a bit less. The goal of the Commission staff's June 9th letter was to obtain a limited amount of information in time for the Commission's June 24th meeting in line with what was contemplated by the comments of the Commissioners (a list of expenditures; bank documentation; confirmation of independence of spending). The request will not necessarily elicit all the information necessary to determine if VoteRise qualifies as a PAC. For example, the request did not ask about monetary contributions received for purposes of influencing candidate elections in Maine and did not ask for detailed explanations of services received by the PAC for purposes of influencing Maine candidate elections, which could shed light on the conflicting assertions made by attorneys for the Shah campaign and VoteRise. If the Commission wishes to further consider the PAC registration or independent expenditure reporting issue, additional requests may be necessary.

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Admitted in: ME

June 6, 2026

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

BY ELECTRONIC MAIL

Dear Jonathan,

On behalf of the Shah for Maine Campaign and pursuant to MRSA 21-A Section 1003 Subsection 2, we respectfully request that the Commission immediately investigate a text message disseminated today by a group loosely identified as 'Vote Rise.' The text message, which expressly advocates for the election of a candidate, does not comply with the disclaimer requirements established by 21-A M.R.S. § 1014(5-A).

BACKGROUND

Earlier today, members of the Shah campaign received a political text message from telephone number (541) 937-9804 concerning the Democratic primary election for Governor. The message urged recipients to support a coordinated ranking strategy involving candidates Shenna Bellows, Troy Jackson and Hannah Pingree. Specifically, the communication included a graphic displaying the branding of WMTW-TV. That message resembles a screenshot from WMTW-TV social media and states: Bellows, Jackson and Pingree Cross-Endorse for Governor.

The message also contained a hyperlink associated with the domain vote-rise.com. Upon clicking the link, the browser briefly displayed the vote-rise.com domain before automatically redirecting to a Maine Public news article from May 22, 2026 entitled "Shenna Bellows, Troy Jackson and Hannah Pingree form ranked-choice alliance in gubernatorial primary."

To our knowledge and based on our research, Vote Rise is not a registered independent expenditure entity or political action committee in Maine. Additionally, the actual voterise.info website does not contain information about who funds the website and its political activities. Copies of the text message, redirect sequence, and destination webpage are attached.

TRANSPARENCY CONSIDERATIONS OF 21-A M.R.S. § 1014(5-A)

The text message disseminated by Vote Rise instructs recipients how to rank candidates in the upcoming gubernatorial primary and encourages support for a coordinated slate of candidates. This expressly advocates for the election of a candidate as defined in Chapter 1, § 10(2)(B) of the Commission's Rules. Notably, the text message does not clearly and conspicuously identify the person, organization, political action committee, or other entity that financed or authorized the communication. This is in direct violation of 21-A MRSA § 1014 (5-A), requiring text messages to clearly and conspicuously state the name of the person who made or financed the expenditure.[1]

ADDITIONAL CONCERNS

The Commission should also determine the identity and legal status of the entity operating through the vote-rise.com domain. Based upon a review of publicly available information, we cannot determine the legal entity responsible for the communication; whether that entity is registered with the Commission in any capacity; or whether any reporting obligations were triggered by expenditures associated with the communication. Per Maine election law and the Commission's most recent guidance on independent expenditures, an entity making an independent expenditure in excess of $1,000 is required to file a report within one calendar day of making the expenditure. As of 3:00 pm of the

[1] Further, the redirect website or destination article does not identify the sponsor responsible for the communication.

date of this letter, there is no registration by Vote Rise on the Commission's website. We believe that for a group previously unengaged in the Maine gubernatorial campaign to disseminate a text message would have required more than 24 hours to establish a vendor relationship, secure a texting platform, prepare the text copy and determine the voters to be targeted.

REQUEST FOR INVESTIGATION

The campaign respectfully requests that the Commission determine whether the text messages disseminated by Vote Rise expressly advocating for a candidate violate 21-A MRSA § 1014 (5-A). Further, we ask that the Commission investigate whether any registration or reporting obligations apply to the entity responsible for these test messages. We urge the Commission to take immediate and appropriate action under Maine law.

Sincerely,

Newell A. Augur

Attachments

11:28 5G 19

4

+1 (541) 937-9804

Text Message • SMS
Today 11:14 AM

WMTW-TV
@WMTV

Bellows, Jackson and Pingree Cross-Endorse for Governor

Candidates Hannah Pingree, Shenna Bellows and Troy Jackson want you to vote for all three of them this upcoming Tuesday. Ranked Choice Voting allows you to rank candidates by preference.

Stand with the slate for a better Maine. Troy Jackson, Hannah Pingree and Shenna Bellows have cross-endorsed each other in next week's Dem primary for Governor. Have a favorite? Rank them #1. Then rank the other two #2 and #3. That's how all three asked Mainers to vote, and it's how you make your ballot count next Tuesday, June 9th. Full story here: https://vote-rise.com/meBN1?id=TRQU
- VR, stop to end

Text Message • SMS

Report Spam

12:57

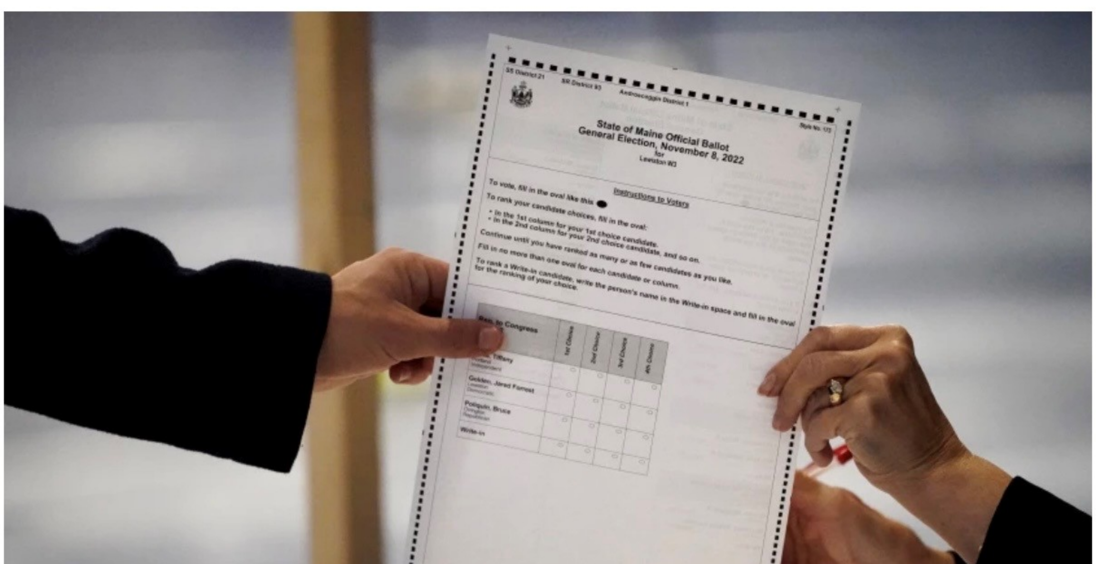
vote-rise.com

3

Shenna Bellows, Troy Jackson and Hannah Pingree form ranked-choice alliance in gubernatorial primary

Maine Public | By Kevin Miller

Published May 22, 2026 at 4:42 PM EDT



VOTE RISE

EVERY CITIZEN NEEDS TO EXERCISE THEIR RIGHT TO VOTE

At VoteRise, we work to ensure that everyone has access to the tools and knowledge needed to participate in the electoral process.

LEARN MORE ↓

YOUR VOICE MATTERS.
AND YOUR VOTE IS POWERFUL.

WHY VOTE?

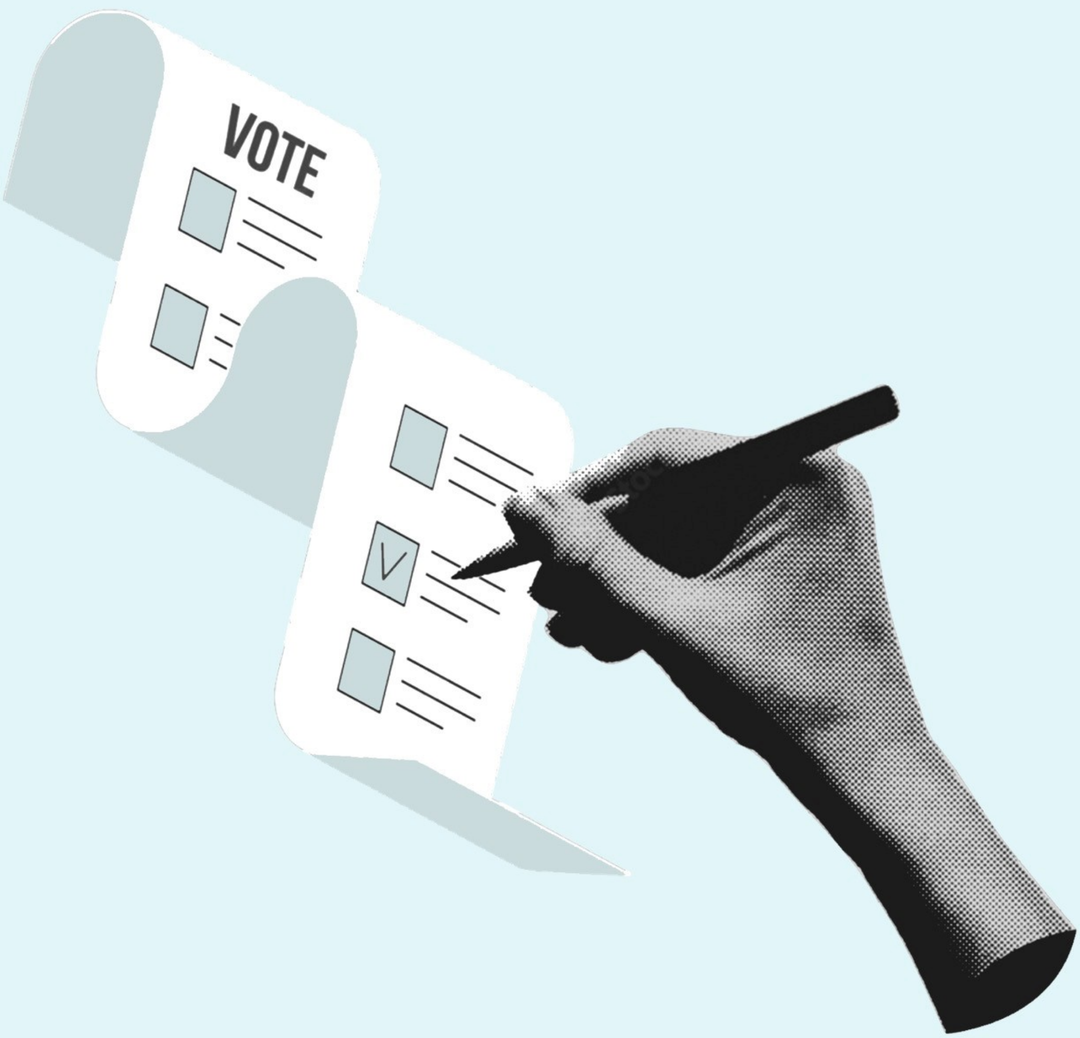
Voting is one of the most important ways to shape the future of your community and country. We promote non-partisan civic engagement by helping

voterise.info

WHY VOTE?

Voting is one of the most important ways to shape the future of your community and country. We promote non-partisan civic engagement by helping citizens understand the impact of their vote. When more people participate, our democracy becomes stronger, more inclusive, and more reflective of the people it serves.

LEARN MORE ↓



READY TO MAKE A DIFFERENCE?

We offer resources for voter registration, important election dates, and information on local, state, and national elections. Together, we can ensure that every eligible voter has the opportunity to participate in shaping our future.

LEARN MORE ↓

CONTACT US AND GET INVOLVED

Name

CONTACT US
AND GET INVOLVED

Name

Johnny Appleseed

Email Address

myname@mydomain.com

Inquiry Type

General Question

Your Message

Type your message

I'm not a robot

reCAPTCHA

SUBMIT

Paid for by Voterise. voterise.info Not authorized by any candidate or candidate's committee.

WHOIS search results

Domain Information

Name	voterise.info
Registry Domain ID	-
Registered On	2024-10-04T19:52:15.517Z
Expires On	2026-10-04T19:52:15.517Z
Updated On	2025-09-09T04:27:46.128Z
Domain Status	client transfer prohibited
Name Servers	chloe.ns.cloudflare.com julio.ns.cloudflare.com

Registrant Contact

Name	DATA REDACTED
Organization	DATA REDACTED

Registrant Contact

Name	DATA REDACTED
Organization	DATA REDACTED
Phone	DATA REDACTED;ext=DATA REDACTED
Fax	DATA REDACTED;ext=DATA REDACTED
Email	https://domaincontact.registrar.cloudflare.com/voterise.info
Mailing Address	DATA REDACTED, DATA REDACTED, DATA REDACTED, IL, DATA REDACTED

Technical Contact

Name	DATA REDACTED
Organization	DATA REDACTED

Registrar Information

Name	Cloudflare, Inc.
IANA ID	1910
Abuse Contact Email	registrar-abuse@cloudflare.com
Abuse Contact Phone	+1.4153197517

DNSSEC Information

Delegation Signed	Unsigned

Notice and Remarks

Terms of Service
Access to RDAP information is provided to assist persons in determining the contents of a domain name registration record in the registry database. The data in this record is provided by Identity Digital or, if the record pertains to a TLD not operated by Identity Digital, then the corresponding primary Registry Operator for informational purposes only, and neither Identity Digital nor the Registry Operator

21-A M.R.S. § 1014. Publication or distribution of political public communications

1. Authorized by candidate. Whenever a person makes an expenditure to finance a public communication expressly advocating the election or defeat of a clearly identified candidate, the public communication, if authorized by a candidate, a candidate's authorized political committee or a candidate's or a candidate's authorized political committee's agents, must clearly and conspicuously state that the public communication has been so authorized and must clearly state the name and address of the person who made or financed the expenditure for the public communication. A public communication financed by a candidate or the candidate's committee is not required to state the address of the candidate or committee that financed the public communication. If a public communication that is financed by someone other than the candidate or the candidate's authorized committee is broadcast by radio, only the city and state of the address of the person who financed the public communication must be stated.

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

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

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

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

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

A broadcast, cable or satellite television communication or Internet video communication must include both an audible and a written statement. For a broadcast, cable or satellite television communication or Internet video communication 60 seconds or less in duration, the audible statement may be omitted.

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

A. For purposes of this subsection, "funder" includes:

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

(2) Any entity that has given a gift, subscription, loan, advance or deposit of money or anything of value, except for transactions in which a fair value is given in return, since the day following the most recent general election day.

B. If funders have given equal amounts, creating a tie in the ranking of the top 3 funders, the tie must be broken by naming the tying funders in chronological order of the receipt of funding until 3 funders are included in the statement. If the chronological order cannot be discerned, the entity making the independent expenditure may choose which of the tying funders to include in the statement. A public communication may not be required to include the names of more than 3 funders.

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

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

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

F. The statement required under this subsection is not required in any public communication consisting of an audio broadcast of 60 seconds or less or a print communication of 20 square inches or less.

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

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

3. Broadcasting prohibited without disclosure. Except as provided in subsection 5-C, paragraph C, a person operating a broadcast, cable or satellite system within this State may not broadcast any public communication, as described in subsections 1 to 2-A, without an oral or written visual announcement of each disclosure required by this section.

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

3-B. Newspapers. Except as provided in subsection 5-C, paragraph C, a newspaper may not publish a public communication described in subsections 1 to 2-A without including each disclosure required by this section. For purposes of this subsection, “newspaper” includes any printed material intended for general circulation or to be read by the general public, including a version of the newspaper displayed on a website owned or operated by the newspaper. When necessary, a newspaper may seek the advice of the commission regarding whether or not a communication requires the disclosure.

4. Enforcement. A violation of this section may result in a civil penalty of no more than 100% of the amount of the expenditure in violation, except that a violation of subsection

5-C may result in a civil penalty of no more than 500% of the amount of the expenditure in violation and except that an expenditure for yard signs lacking the required information may result in a maximum civil penalty of $200. In assessing a civil penalty, the commission shall consider, among other things, how widely the public communication was disseminated, whether the violation was intentional, whether the violation occurred as the result of an error by a printer or other paid vendor and whether the public communication conceals or misrepresents the identity of the person who financed it. If the person who financed the public communication or who committed the violation corrects the violation within 10 days after receiving notification of the violation from the commission by adding the missing information to the public communication, the commission may, except for a violation of subsection 5-C, decide to assess no civil penalty.

5. Telephone calls. [2025, ch. 224, § 7 (RP).]

5-A. Text messages. Text messages sent with the assistance of mass distribution technology that is paid for by a person must clearly and conspicuously state the name of the person who made or financed the expenditure if:

A. The text message expressly advocates the election or defeat of a candidate; or

B. The text message contains a link to a website that expressly advocates the election or defeat of a candidate.

5-B. Websites of candidate or political committee. A website or other Internet application available to the general public that is established by a party committee or a person that is required to register with the commission as a candidate or political action committee and that expressly advocates for the election or defeat of a candidate or that names a clearly identified candidate during the 28 days, including election day, before a primary election, during the 35 days, including election day, before a special election or during the period of time from Labor Day to the election day for a general election must state the name and address of the person who made or financed the expenditure for the website or other Internet application and state that the website or other Internet application was or was not authorized by the candidate.

5-C. Use of synthetic media. Whenever a public communication that requires a disclosure under subsections 1, 2, 2-A or 2-B contains synthetic media, the public communication must include, in addition to any other required disclosure, the words "THIS COMMUNICATION CONTAINS AUDIO, VIDEO AND/OR IMAGES THAT HAVE BEEN MANIPULATED OR ALTERED." The commission shall adopt rules regarding the manner, size and placement of the disclosure required under this subsection. Rules adopted pursuant to this subsection are routine technical rules as defined in Title 5, chapter 375, subchapter 2-A.

A. For purposes of this subsection, "synthetic media" means an image, an audio recording or a video recording depicting a candidate's appearance, speech or conduct that:

(1) In a manner that is likely to deceive a reasonable person, depicts the candidate saying or doing something that the candidate did not say or do; or

(2) Has been manipulated or altered in a manner that is likely to provide a reasonable person with a materially different understanding or impression of the candidate's appearance, action or speech than a reasonable person would have from an unaltered, original version of the image, audio recording or video recording.

B. For purposes of this subsection, "synthetic media" does not include:

(1) An image, an audio recording or a video recording depicting a candidate's appearance, speech or conduct that has been modified to improve audio, video or image clarity, to add captions or to highlight a specific section of the image, audio recording or video recording as long as the modification does not create a materially different understanding or impression of the candidate's appearance, action or speech than a reasonable person would have from an unaltered, original version of the image, audio recording or video recording; or

(2) Satire or parody.

C. A person operating a broadcast, cable or satellite system within the State that broadcasts a public communication does not violate this subsection and a newspaper that publishes a public communication does not violate this subsection unless the broadcaster broadcasts or newspaper publishes a paid public communication with actual knowledge that the public communication contains synthetic media. The broadcaster's or newspaper's receipt of an allegation made by a 3rd party that a public communication contains synthetic media does not, by itself, constitute actual knowledge by the broadcaster or newspaper that the public communication contains synthetic media. For purposes of this paragraph, "newspaper" has the same meaning as in subsection 3-B.

D. The commission shall notify the Office of the Attorney General if a person who is in violation of this subsection does not cease violating this subsection after being notified of the violation by the commission or if the commission is unable for any reason to notify a person that the person is in violation of this subsection. The Attorney General may bring a civil action in the Superior Court of Kennebec County for injunctive or other appropriate equitable relief requiring the person to comply with this subsection. An action under this paragraph may be combined with an action under section 1004-B for the purposes of the enforcement of penalties assessed by the commission. If the Attorney General prevails in an action under this paragraph, the court may award to the Attorney General the costs of the action together with reasonable attorney's fees as determined by the court.

E. This subsection may not be construed to prohibit or limit any other cause of action that a person may have against a person who violates this subsection.

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

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

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

C. Internet and e-mail activities costing less than $100, as excluded by rule of the commission, paid for by one or more individuals who are not required to register or file campaign finance reports with the commission and who are acting independently of and without authorization by a candidate, candidate's authorized campaign committee, party committee, political action committee or ballot question committee or an agent of a candidate, candidate's authorized campaign committee, party committee, political action committee or ballot question committee;

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

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

F. Prerecorded automated telephone calls paid for by the candidate that use the candidate's voice in the telephone call and that are made in support of that candidate; and

G. Telephone surveys that meet generally accepted standards for polling research and that are not conducted for the purpose of influencing the voting position of call recipients.

21-A M.R.S. § 1019-B. Reports of independent expenditures

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

> **A.** Is made to design, produce or disseminate any public communication that expressly advocates the election or defeat of a clearly identified candidate; or
>
> **B.** Unless the person, party committee or political action committee making the expenditure demonstrates under subsection 2 that the expenditure did not have a purpose or effect of influencing the nomination, election or defeat of the candidate, is made to design, produce or disseminate a public communication that names or depicts a clearly identified candidate and is disseminated during the 28 days, including election day, before a primary election; during the 35 days, including election day, before a special election; or from Labor Day to a general election day.

2. Commission determination. A person, party committee or political action committee may request a determination that an expenditure that otherwise meets the definition of an independent expenditure under subsection 1, paragraph B is not an independent expenditure by filing a signed written statement with the commission within 7 days of disseminating the communication stating that the cost was not incurred with a purpose of influencing the nomination, election or defeat of a candidate, supported by any additional evidence the person, party committee or political action committee chooses to submit. The commission may gather any additional evidence it determines relevant and material. The commission shall determine by a preponderance of the evidence whether the cost was incurred with a purpose of, or had the effect of, influencing the nomination, election or defeat of a candidate. In order to make this determination, the commission shall consider whether the language and other elements of the communication would lead a reasonable person to conclude that the communication had a purpose of, or had the effect of, influencing an election. The commission may consider other factors, including, but not limited to, the timing of the communication, the recipients of the communication or, if the communication is a digital communication, any links to publicly accessible websites related to the nomination, election or defeat of a candidate. The commission's executive director shall make an initial determination on the request, which must be posted on the commission's publicly accessible website. Any person may appeal the initial determination, which must be considered by the commission at the next public meeting that is feasible.

3. Report required; content; rules. [2009, ch. 524, § 6 (RPR); MRSA T. 21-A § 1019-B, sub-§3 (RP).]

4. Report required; content; rules. A person, party committee or political action committee that makes any independent expenditure in excess of $1,000 during any one candidate's election shall file a report with the commission. In the case of a municipal election, the report must be filed with the municipal clerk.

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

B. A report required by this subsection must contain an itemized account of the total contributions from each contributor, each expenditure in excess of $1,000 in any one candidate's election, the date and purpose of each expenditure and the name of each payee or creditor. The report must state whether the expenditure is in support of or in opposition to the candidate and must include, under penalty of unsworn falsification, as provided in Title 17-A, section 453, a statement whether the expenditure is made in cooperation, consultation or concert with, or at the request or suggestion of, the candidate or an authorized committee or agent of the candidate.

C. A report required by this subsection must be on a form prescribed and prepared by the commission. A person filing this report may use additional pages if necessary, but the pages must be the same size as the pages of the form. The commission may adopt procedures requiring the electronic filing of an independent expenditure report, as long as the commission adopts an exception for persons who lack access to the required technology or the technological ability to file reports electronically.

5. Exclusions. An independent expenditure does not include:

A. [2021, ch. 132, § 9 (RP).]

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

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

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

6. Segregated contributions required. A political action committee may use only funds received in compliance with section 1015, subsection 2-C or 2-D when making independent expenditures. A political action committee that makes independent expenditures shall keep an account of any contributions received for the purpose of making those expenditures.

21-A M.R.S. § 1052. Definitions

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

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

A. A people's veto referendum under the Constitution of Maine, Article IV, Part Third, Section 17;

B. A direct initiative of legislation under the Constitution of Maine, Article IV, Part Third, Section 18;

C. An amendment to the Constitution of Maine under Article X, Section 4;

D. A referendum vote on a measure enacted by the Legislature and expressly conditioned upon ratification by a referendum vote under the Constitution of Maine, Article IV, Part Third, Section 19;

E. The ratification of the issue of bonds by the State or any agency thereof; and

F. Any county or municipal referendum.

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

2-A. Ballot question committee. "Ballot question committee" means a person that receives contributions or makes expenditures aggregating in excess of $5,000 for the purpose of initiating or influencing a campaign, other than a campaign for the nomination or election of a candidate. The term "ballot question committee" does not include a party committee, an exempt donor or a political action committee not required to register as a ballot question committee under section 1052-A, subsection 1-A, paragraph A.

3. Contribution. "Contribution" includes:

A. A gift, subscription, loan, advance or deposit of money or anything of value made to or received by a committee for the purpose of initiating or influencing a campaign, including but not limited to:

(1) Funds that the contributor specified were given, in whole or in part, in connection with a campaign;

(2) Funds provided in response to a solicitation that would lead the contributor to believe that the funds would be used specifically, in whole or in part, for the purpose of initiating or influencing a campaign; and

(3) Funds that can reasonably be determined to have been provided by the contributor for the purpose of initiating or influencing a campaign when viewed in the context of the contribution and the recipient committee's activities regarding a campaign;

A-1. Any funds deposited or transferred into the campaign account described in section 1054;

B. [2025, ch. 224, § 17 (RP).]

C. Any funds received by a committee that are to be transferred to any candidate, committee, campaign or organization for the purpose of initiating or influencing a campaign; or

D. The payment, by any person or organization, of compensation for the personal services of other persons provided to a committee that is used by the committee to initiate or influence a campaign.

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

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

A. Contributions of money to candidates, party committees, political action committees or ballot question committees registered with the commission or a municipality; or

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

4. Expenditure. The term "expenditure":

A. Includes:

(1) A purchase, payment, distribution, loan, advance, deposit or gift of money or anything of value, made for the purpose of initiating or influencing a campaign;

(1-A) Any purchase, payment, distribution, loan, advance, deposit or gift of money made from the campaign account described in section 1054;

(2) A contract, promise or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure for the purposes set forth in this paragraph; and

(3) The transfer of funds by a political action committee to another candidate or political committee; and

B. Does not include:

(1) Any news story, commentary or editorial distributed through the facilities of any broadcasting station, cable television system, newspaper, magazine or other periodical publication, unless these facilities are owned or controlled by any political party, political committee, candidate or the spouse or domestic partner of a candidate;

(2) Activity designed to encourage individuals to register to vote or to vote, if that activity or communication does not mention a clearly identified candidate;

(3) Any communication by any membership organization or corporation to its members or stockholders, if that membership organization or corporation is not organized primarily for the purpose of influencing the nomination or election of any person to state or county office;

(4) The use of real or personal property and the cost of invitations, food and beverages, voluntarily provided by a political action committee in rendering voluntary personal services for candidate-related activities, if the cumulative value of these activities by the political action committee on behalf of any candidate does not exceed $250 with respect to any election;

(5) Any unreimbursed travel expenses incurred and paid for by a political action committee that volunteers personal services to a candidate, if the cumulative amount of these expenses does not exceed $100 with respect to any election;

(6) Any communication by a committee that is not made for the purpose of influencing the nomination or election of any person to state or county office; and

(7) Any payments to initiate a people's veto referendum or the direct initiative of legislation made prior to the submission of an application to the Department of the Secretary of State as provided in section 901.

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

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

4-C. Leadership political action committee. [2023, ch. 244, § 11 (RP).]

5. Political action committee. The term "political action committee":

A. Includes:

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

(5) Any person, including any corporation or association, other than an individual, that receives contributions or makes expenditures aggregating more than $2,500 in a calendar year for the purpose of influencing the nomination or election of any candidate to political office; and

B. Does not include:

(1) A candidate or a candidate's treasurer under section 1013-A, subsection 1;

(2) A candidate's authorized political committee under section 1013-A, subsection 1, paragraph B;

(3) A party committee under section 1013-A, subsection 3; or

(4) An exempt donor.

6. Separate segregated fund committee. [2023, ch. 244, § 12 (RP).]

21-A M.R.S. § 1053-B. Out-of-state committees

An organization that is registered as a political action committee, ballot question committee or political committee with the Federal Election Commission or a jurisdiction outside of this State shall register and file reports with the commission in accordance with this subchapter upon receiving contributions or making expenditures to initiate or influence a campaign in the State in excess of the amounts that would require registration under section 1052-A. The committee is not required to register and file reports if the committee's only financial activity within the State is to make contributions to candidates, party committees, political action committees or ballot question committees registered with the commission or a municipality and the committee has not raised and accepted any contributions during the calendar year to influence a campaign in this State.

From: Howie Stanger <howie@pocketbookstrategies.com>
Sent: Monday, June 8, 2026 3:13 PM
To: Wayne, Jonathan <Jonathan.Wayne@maine.gov>; Dayne Lee <dayne@movementlabs.com>
Subject: Follow Up from VoteRise

Dear Maine Ethics Commission,

I am the treasurer of Vote Rise, a hybrid committee registered with the FEC (C00890400). We are an independent expenditure-only committee.

On Saturday June 6th, we sent voters a text message that were apart of Candidate Sha's compliant. Our understanding is that we complied with Maine Ethics rules by including the full name of the committee in the URL that was sent. After speaking with Commission staff, we will include the phrase "Paid for by VoteRise" in any further communications that are sent to Maine voters.

These are express advocacy messages. At this time VoteRise does not anticipate spending more than $1,000 per candidate or $2,500 overall, such that it is required to register under Maine campaign finance regulations.

We appreciate the Maine Ethics Commission for speaking with us and being responsive.

thanks,

Howie Stanger

Treasurer, Voterise

--

Howie Stanger (he/they)

Founder & Director

310-929-0276