



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

To: Commissioners  
From: Martha Currier, Assistant Director  
Date: September 14, 2022  
Re: Candidates Who Have Not Filed Financial Disclosure Statements

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Candidates for the 2022 elections, who are not incumbents, were required to file a Statement of Sources of Income (SOSOI) by August 15, 2022. The SOSOI discloses certain elements of their personal finances and those of their immediate family members for 2021. Incumbents running filed their SOSOIs in February 2022. Despite clear and frequent communications by staff, candidates Timothy S. Keenen, Daniel L. Merrill, and Nancy G. Piche have not filed their statements and are subject to a finding of a civil violation for which a fine of not more than \$100 may be adjudged.

### **LEGAL REQUIREMENTS**

1 M.R.S. § 1016-G outlines the information required to be provided to the Commission on the SOSOI report. 1 M.R.S. § 1016-C specifically requires all candidates, except for those currently in the Legislature to file a report no later than 5:00 p.m. on August 15 before the general election unless they withdraw from the election by that date.

The report requires the reporting of sources of income received, positions held, and reportable liabilities incurred during the previous calendar year by the candidate or members of their immediate family. The Commission has an e-filing website to accept this information. Staff estimate it takes less than 10 minutes to complete the disclosure.

1 M.R.S. § 1016-G(3)(A) provides a grace period for the late SOSOI filer that allows them to avoid a finding of civil violation and penalty. “Failing to file a statement within 15 days of having been notified by the Commission is a civil violation for which a fine of not more than \$100 may be adjudged...” In this case, that letter was sent by email and regular mail on September 1.

## **STAFF ANALYSIS**

Commission staff sent Mr. Keenan, Mr. Merrill, and Ms. Piche four email notices of their statutory requirement to file the SOSOI (July 13, August 1, August 15, and August 16). All notices outlined the critical need to file a timely report, information about how to contact staff for assistance, the SOSOI website, and a link to an instructional PDF. The last two emails included the possible penalty for failing to file on time. Unfortunately, as of this writing none of the candidates have filed their SOSOI. Notably, Mr. Merrill withdrew from the general election on August 30 but is still required to file the report because he failed to withdraw prior to August 15. None of the candidates have contacted this office since receiving the finding of violation notice dated September 1.

The Legislature made clear by enacting the penalty provision in 1 M.R.S. § 1016-C that a financial disclosure is an important consideration to voters before the general election. As such, it is important for the Commission to consider whether filers be strictly held to the law. In March 2022, the Commission considered the late filing of SOSOI reports by three legislators and referred the matter to the Office of the Attorney General (OAG), who at his discretion declined to take further action. In this case, none of the filers have filed the SOSOI.

As of this writing, none of the three candidates have submitted comments to the Commission responding to the proposed violation or penalty as suggested in the September 1 letter advising them this matter would be on the agenda for the September 28 meeting.

## **STAFF RECOMMENDATION**

The candidates violated 1 M.R.S. § 1016-C by not filing the financial disclosure statement by the August 15 deadline. You therefore have the discretion to make a finding that they violated the statute. Additionally, you may refer them to the OAG for collection of a penalty of up to \$100 because they did not file a statement within 15 days of receiving the final notice from staff. These actions are not required, however. Unlike the penalty statutes that apply when a candidate, PAC, or party committee files a campaign finance report late (21-A M.R.S. §§ 1020-A (6) and 1062-A), the law does not establish a presumptive penalty when a candidate does not file an

SOSOI (or files it late). The Legislature has created different late-filing procedures for the two types of disclosures.

The Commission staff recommends one or both of the following actions:

- 1) Find that they violated 1 M.R.S. § 1016-C, and/or
- 2) Refer the candidates to the OAG for collection of a penalty up to \$100 through a civil action.

Thank you for your consideration of this matter as your action in this case will become a baseline for how we handle candidates' failure to file SOSOI disclosures in future election cycles.

**Currier, Martha**

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**From:** Aube, Julie on behalf of Currier, Martha  
**Sent:** Thursday, September 1, 2022 11:31 AM  
**To:** tskeenan@gmail.com  
**Cc:** Aube, Julie  
**Subject:** Violation Notice – Commission Action Pending  
**Attachments:** Timothy Keenan Notice of Pending Commission Action.pdf

**Importance:** High

Mr. Keenan,

Please see attached violation notice that will be on the agenda of the Maine Ethics Commission September 30<sup>th</sup> meeting.

Sincerely,



Martha Currier  
Assistant Director

September 1, 2022

*By Email and U.S. Mail*

Mr. Timothy S. Keenan  
257 Alfred Street  
Biddeford, ME 04005

Re: Violation Notice – Commission Action Pending  
2021 Statement of Sources of Income

Dear Mr. Keenan:

Your 2021 Statement of Sources of Income (SOSOI) covering 1/1/2021 – 12/31/2021 as a candidate for legislative office that was due on August 15<sup>th</sup> has not been filed pursuant to 1 M.R.S. § 1016-C. The law states that since you failed to file this statement within 15 days of having been notified by this office on August 16, 2022, you are in violation of 1 M.R.S. § 1016-G(3)(A).

This matter will now be forwarded to the Commission members for consideration of a finding of civil violation for which a fine up to \$100 may be assessed at its public meeting on September 28<sup>th</sup>. You may respond to the proposed finding of violation and penalty by participating in the meeting or submitting written comments no later than September 14<sup>th</sup> containing a full explanation of the reasons you failed to file this statement. Upon receiving your request, the staff will include your letter with our recommendation to the Commission for the September meeting.

Sincerely,



Martha Currier  
Assistant Director

**Currier, Martha**

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**From:** Currier, Martha  
**Sent:** Thursday, September 15, 2022 4:15 PM  
**To:** Studio19@gmail.com  
**Subject:** Violation Notice – Commission Action Pending  
**Attachments:** Merrill, Dan 09152022.pdf

**Importance:** High

Mr. Merrill,

Please see the attached violation notice that will be on the agenda of the Maine Ethics Commission meeting on September 28.

I understand that you withdrew as a candidate from the November election on August 30, however, the law still requires this filing because you did not withdraw by August 15.

Sincerely,



Martha Currier  
Assistant Director  
Maine Ethics Commission  
135 S.H.S.  
Augusta, ME 04333-0135  
Direct (207) 287-3024  
Main (207) 287-4179



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

September 15, 2022

*By Email and U.S. Mail*

Mr. Dan Merrill  
19 Loring Avenue  
Portland, ME 04103

Re: Violation Notice – Commission Action Pending  
2021 Statement of Sources of Income

Dear Mr. Merrill,

Your 20201 Statement of Sources of Income (SOSOI) covering 1/1/2021 – 12/31/2021 as a candidate for legislative office that was due on August 15, 2022, has not been filed pursuant to 1 M.R.S. § 1016-C. The law states that since you failed to file this statement within 15 days of having been notified by this office on August 16 you are in violation of 1 M.R.S. § 1016-G(3)(A).

This matter will now be forwarded to the Commission members for consideration of a finding of civil violation for which a fine of up to \$100 may be assessed at its public meeting on September 28. You may respond to the proposed finding of violation and penalty by participating in the meeting or submitting written comments no later than September 26 containing a full explanation of the reasons you failed to file this statement. Upon receiving your request, the staff will include your letter with our recommendation to the Commission for the September meeting.

Sincerely,

A handwritten signature in black ink that reads "Martha Currier".

Martha Currier  
Assistant Director

## Currier, Martha

---

**From:** Aube, Julie on behalf of Currier, Martha  
**Sent:** Thursday, September 1, 2022 11:29 AM  
**To:** bfd52@icloud.com  
**Cc:** Aube, Julie  
**Subject:** Violation Notice - Commission Action Pending  
**Attachments:** Nancy Germaine Piche Notice of Pending Commission Action.pdf

Mrs. Piche,

Please see attached violation notice that will be on the agenda of the Maine Ethics Commission September 30<sup>th</sup> meeting.

Sincerely,

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

Martha Currier  
Assistant Director



September 1, 2022

*By Email and U.S. Mail*

Mrs. Nancy Germaine Piche  
19 Evergreen Drive  
Waterboro, ME 04061

Re: Violation Notice – Commission Action Pending  
2021 Statement of Sources of Income

Dear Mrs. Piche:

Your 2021 Statement of Sources of Income (SOSOI) covering 1/1/2021 – 12/31/2021 as a candidate for legislative office that was due on August 15<sup>th</sup> has not been filed pursuant to 1 M.R.S. § 1016-C. The law states that since you failed to file this statement within 15 days of having been notified by this office on August 16, 2022, you are in violation of 1 M.R.S. § 1016-G(3)(A).

This matter will now be forwarded to the Commission members for consideration of a finding of civil violation for which a fine up to \$100 may be assessed at its public meeting on September 28<sup>th</sup>. You may respond to the proposed finding of violation and penalty by participating in the meeting or submitting written comments no later than September 14<sup>th</sup> containing a full explanation of the reasons you failed to file this statement. Upon receiving your request, the staff will include your letter with our recommendation to the Commission for the September meeting.

Sincerely,



Martha Currier  
Assistant Director

## Currier, Martha

---

**From:** Currier, Martha  
**Sent:** Monday, August 1, 2022 9:28 AM  
**To:** tskeenan@gmail.com  
**Subject:** ACTION NEEDED - 2nd NOTICE - Ethics SOSOI - Due 8/15/2022

To: Mr. Timothy Keenan  
From: Martha Currier, Assistant Director  
Maine Commission on Governmental Ethics and Election Practices  
Date: August 1, 2022  
Re: **SECOND NOTICE** - Legislative Candidate Statement of Sources of Income

This is a reminder that your Statement of Sources of Income (SOSOI) for 2021 has not been filed yet and is due in two weeks on **August 15, 2022 by 5:00 p.m.** pursuant to 1 M.R.S. § 1016-C. This disclosure is required for all legislative candidates; currently elected officials filed SOSOIs earlier this year.

From start to finish, it will take approximately 10 minutes to file the SOSOI and there are [filing instructions](#) to assist you. The e-filing system for the SOSOI, uses different login credentials than your campaign finance reports but has a similar look and feel. You'll know that you've logged into the SOSOI site when you see a purple banner with "Ethics Disclosure" at the top of the screen.

Your SOSOI username is **TKeenan04**. If you do not know your password, you can request a reminder from the login page to be sent to the same email address as this notice. The password will come from [ethics@maine.gov](mailto:ethics@maine.gov), and is sometimes re-rerouted to spam or junk folders, so please check those if you do not see an email within 10 minutes.

You do not need to report amounts, but must disclose the sources of your household income, including your employer, self-employment, any business you own, retirement income, stock dividends, etc. The law also requires the same information for all members in your household including significant others and children. Additionally, you must disclose any positions held in for-profit or non-profit organizations and political committees.

Please file your SOSOI as soon as possible. If you have any questions, please call Commission Assistant Julie Aube at 287-4179 or email [ethics@maine.gov](mailto:ethics@maine.gov).

## Currier, Martha

---

**From:** Currier, Martha  
**Sent:** Monday, August 15, 2022 9:15 AM  
**To:** tskeenan@gmail.com  
**Subject:** ETHICS DEADLINE TODAY BY 5:00 p.m. - Ethics SOSOI

To: Mr. Timothy Keenan  
From: Martha Currier, Assistant Director  
Maine Commission on Governmental Ethics and Election Practices  
Date: August 15, 2022  
Re: **DEADLINE TODAY - Legislative Candidate Income Statement due by 5:00 p.m.**

You are receiving this notice because you have not yet filed your 2021 Statement of Sources of Income (SOSOI), which is due **today by 5:00 p.m.** pursuant to 1 M.R.S. § 1016-C. This disclosure is required for all legislative candidates; currently elected officials filed SOSOIs earlier this year.

Your SOSOI username is **TKeenan04**. If you do not know your password, you can request a reminder from the [login page](#) to be sent to the same email address as this notice. The password will come from [ethics@maine.gov](mailto:ethics@maine.gov), and is sometimes re-rerouted to spam or junk folders, so please check those if you do not see an email within 10 minutes.

Please use the [filing instructions](#) to assist you. The e-filing system for the SOSOI, uses different login credentials than your campaign finance reports but has a similar look and feel. You'll know that you've logged into the SOSOI site when you see a purple banner with "Ethics Disclosure" at the top of the screen.

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If you have any questions, please call Commission Assistant Julie Aube at 287-4179 or email [ethics@maine.gov](mailto:ethics@maine.gov).

**The penalty for failing to file an SOSOI can be subject to a civil violation and assessed a fine up to \$100. (1 M.R.S. § 1016-G)**

## Currier, Martha

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**From:** Currier, Martha  
**Sent:** Tuesday, August 16, 2022 1:18 PM  
**To:** tskeenan@gmail.com  
**Subject:** PAST DUE - Ethics SOSOI  
**Attachments:** Keenan, Timothy SOSOI Initial.pdf

**Importance:** High

Mr. Keenan,

Please find attached a notice from the Ethics Commission regarding your past due Statement of Sources of Income.

Sincerely,  
Martha Currier  
Assistant Director  
Maine Ethics Commission  
135 S.H.S.  
Augusta, ME 04333-0135  
Direct (207) 287-3024  
Main (207) 287-4179



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

August 16, 2022

Mr. Timothy Keenan  
257 Alfred Street  
Biddeford, ME 04005

Re: Violation Notice – 2021 Statement of Sources of Income

Dear Mr. Keenan:

Your 2021 Statement of Sources of Income (SOSOI) covering 1/1/2021 – 12/31/2021 is past due pursuant to 1 M.R.S. § 1016-C.

Failing to file a statement within 15 days of having been notified by the Commission is a civil violation for which a fine up to \$100 may be assessed. 1 M.R.S. § 1016-G(3)(A).

To avoid a penalty, please file this report no later than Wednesday, August 31, 2022. If the statement is not filed by that date, the Commission will consider whether to find you in violation of the statute and assess a penalty at a future meeting.

If you require assistance using our electronic filing system to file your final SOSOI please contact Commission Assistant Julie Aube at 287-4179.

Sincerely,

A handwritten signature in black ink that reads "Martha Currier".

Martha Currier  
Assistant Director

## Currier, Martha

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**From:** Currier, Martha  
**Sent:** Wednesday, July 13, 2022 10:36 AM  
**To:** studio19@gmail.com  
**Subject:** ACTION NEEDED - Ethics SOSOI - Due August 15

To: Mr. Daniel Merrill  
From: Martha Currier, Assistant Director  
Maine Commission on Governmental Ethics and Election Practices  
Date: July 13, 2022  
Re: Legislative Candidate Statement of Sources of Income

Maine law requires candidates not currently serving in the Legislature to file a Statement of Sources of Income (SOSOI) covering income received during 2021. 1 M.R.S. § 1016-C. This includes your employer, self-employment, any business you own, retirement income, stock dividends, etc. You only need to disclose the sources, not the amounts received from them. The law also requires the same information for all members in your household including significant others and children. In addition to income sources, you must disclose any positions held in for-profit or non-profit organizations and political committees.

The statement for 2021 is due **Monday, August 15, 2022 by 5:00 p.m.** and is filed electronically. This email has been sent to the address we have on file for your disclosure statement, and by the end of this week you will receive your login credentials from [ethics@maine.gov](mailto:ethics@maine.gov). Sometimes these emails are filtered into spam or junk folders, so please check those folders if you do not see them by Saturday morning.

From start to finish, we estimate it will take you 10 minutes to file the SOSOI and we've created [filing instructions](#) to assist you. The e-filing system for the SOSOI, uses different login credentials than your campaign finance reports but has a similar look and feel. You'll know that you've logged into the SOSOI site when you see a purple banner with "Ethics Disclosure" at the top of the screen.

If you have any questions, please call Commission Assistant Julie Aube at 287-4179 or email [ethics@maine.gov](mailto:ethics@maine.gov).

## Currier, Martha

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**From:** Currier, Martha  
**Sent:** Monday, August 1, 2022 9:28 AM  
**To:** studio19@gmail.com  
**Subject:** ACTION NEEDED - 2nd NOTICE - Ethics SOSOI - Due 8/15/2022

To: Mr. Daniel Merrill  
From: Martha Currier, Assistant Director  
Maine Commission on Governmental Ethics and Election Practices  
Date: August 1, 2022  
Re: **SECOND NOTICE** - Legislative Candidate Statement of Sources of Income

This is a reminder that your Statement of Sources of Income (SOSOI) for 2021 has not been filed yet and is due in two weeks on **August 15, 2022 by 5:00 p.m.** pursuant to 1 M.R.S. § 1016-C. This disclosure is required for all legislative candidates; currently elected officials filed SOSOIs earlier this year.

From start to finish, it will take approximately 10 minutes to file the SOSOI and there are [filing instructions](#) to assist you. The e-filing system for the SOSOI, uses different login credentials than your campaign finance reports but has a similar look and feel. You'll know that you've logged into the SOSOI site when you see a purple banner with "Ethics Disclosure" at the top of the screen.

Your SOSOI username is **DMerrill02**. If you do not know your password, you can request a reminder from the login page to be sent to the same email address as this notice. The password will come from [ethics@maine.gov](mailto:ethics@maine.gov), and is sometimes re-routed to spam or junk folders, so please check those if you do not see an email within 10 minutes.

You do not need to report amounts, but must disclose the sources of your household income, including your employer, self-employment, any business you own, retirement income, stock dividends, etc. The law also requires the same information for all members in your household including significant others and children. Additionally, you must disclose any positions held in for-profit or non-profit organizations and political committees.

Please file your SOSOI as soon as possible. If you have any questions, please call Commission Assistant Julie Aube at 287-4179 or email [ethics@maine.gov](mailto:ethics@maine.gov).

## Currier, Martha

---

**From:** Currier, Martha  
**Sent:** Monday, August 15, 2022 9:15 AM  
**To:** studio19@gmail.com  
**Subject:** ETHICS DEADLINE TODAY BY 5:00 p.m. - Ethics SOSOI

To: Mr. Daniel Merrill  
From: Martha Currier, Assistant Director  
Maine Commission on Governmental Ethics and Election Practices  
Date: August 15, 2022  
Re: **DEADLINE TODAY - Legislative Candidate Income Statement due by 5:00 p.m.**

You are receiving this notice because you have not yet filed your 2021 Statement of Sources of Income (SOSOI), which is due **today by 5:00 p.m.** pursuant to 1 M.R.S. § 1016-C. This disclosure is required for all legislative candidates; currently elected officials filed SOSOIs earlier this year.

Your SOSOI username is **DMerrill02**. If you do not know your password, you can request a reminder from the [login page](#) to be sent to the same email address as this notice. The password will come from [ethics@maine.gov](mailto:ethics@maine.gov), and is sometimes re-routed to spam or junk folders, so please check those if you do not see an email within 10 minutes.

Please use the [filing instructions](#) to assist you. The e-filing system for the SOSOI, uses different login credentials than your campaign finance reports but has a similar look and feel. You'll know that you've logged into the SOSOI site when you see a purple banner with "Ethics Disclosure" at the top of the screen.

You do not need to report amounts, but must disclose the sources of your household income, including your employer, self-employment, any business you own, retirement income, stock dividends, etc. The law also requires the same information for all members in your household including significant others and children. Additionally, you must disclose any positions held in for-profit or non-profit organizations and political committees.

If you have any questions, please call Commission Assistant Julie Aube at 287-4179 or email [ethics@maine.gov](mailto:ethics@maine.gov).

**The penalty for failing to file an SOSOI can be subject to a civil violation and assessed a fine up to \$100. (1 M.R.S. § 1016-G)**



## Currier, Martha

---

**From:** Currier, Martha  
**Sent:** Monday, August 15, 2022 12:01 PM  
**To:** studio19@gmail.com  
**Cc:** Commission, Ethics  
**Subject:** RE: Dan Merrill

Mrs. Merrill,

I am sorry to hear that your husband is unwell. I hope that he has a quick recovery and can rest at home soon.

The fact that he is not accepting donations is not germane with this filing. This filing is to identify the sources of income your household received (employment, Social Security, property rentals, etc.) during 2021. The filing is required by law for all candidates and legislators.

If you are unable to file this document for him by 5:00 p.m. today there will be a notice of late filing sent to him, which he can appeal to the Commission who can decide on this matter at either their September or October meeting. Any appeal does not exclude him from filing the form, but may determine whether the Commission would want to move forward with a finding of civil violation.

If you want to file this form on his behalf today and need assistance, it may be easiest to call us at 287-4179.

Sincerely,

Martha Currier  
Assistant Director  
Maine Ethics Commission  
135 S.H.S.  
Augusta, ME 04333-0135  
Direct (207) 287-3024  
Main (207) 287-4179

-----Original Message-----

From: Dan Merrill <studio19@gmail.com>  
Sent: Monday, August 15, 2022 11:49 AM  
To: Commission, Ethics <Ethics.Commission@maine.gov>  
Subject: Dan Merrill

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

This is Dan Merrill's wife, Belinda Dan is hospitalized and will not be able to provide the information you are looking for. However, regardless he most likely wouldn't anyway. So we don't know what this means. He is not accepting donations and he signed and provided a notarized document earlier.

Thank you.

Sent from my iPhone

## Currier, Martha

---

**From:** Currier, Martha  
**Sent:** Tuesday, August 16, 2022 1:18 PM  
**To:** studio19@gmail.com  
**Subject:** PAST DUE - Ethics SOSOI  
**Attachments:** Merrill, Daniel SOSOI Initial.pdf

**Importance:** High

Mr. Merrill,

Please find attached a notice from the Ethics Commission regarding your past due Statement of Sources of Income.

Sincerely,  
Martha Currier  
Assistant Director  
Maine Ethics Commission  
135 S.H.S.  
Augusta, ME 04333-0135  
Direct (207) 287-3024  
Main (207) 287-4179



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

August 16, 2022

Mr. Daniel Merrill  
19 Loring Avenue  
Portland, ME 04103

Re: Violation Notice – 2021 Statement of Sources of Income

Dear Mr. Merrill:

Your 2021 Statement of Sources of Income (SOSOI) covering 1/1/2021 – 12/31/2021 is past due pursuant to 1 M.R.S. § 1016-C.

Failing to file a statement within 15 days of having been notified by the Commission is a civil violation for which a fine up to \$100 may be assessed. 1 M.R.S. § 1016-G(3)(A).

To avoid a penalty, please file this report no later than Wednesday, August 31, 2022. If the statement is not filed by that date, the Commission will consider whether to find you in violation of the statute and assess a penalty at a future meeting.

If you require assistance using our electronic filing system to file your final SOSOI please contact Commission Assistant Julie Aube at 287-4179.

Sincerely,

A handwritten signature in black ink that reads "Martha Currier".

Martha Currier  
Assistant Director

## Currier, Martha

---

**From:** Currier, Martha  
**Sent:** Wednesday, July 13, 2022 10:37 AM  
**To:** bfd52@icloud.com  
**Subject:** ACTION NEEDED - Ethics SOSOI - Due August 15

To: Mrs. Nancy Piche  
From: Martha Currier, Assistant Director  
Maine Commission on Governmental Ethics and Election Practices  
Date: July 13, 2022  
Re: Legislative Candidate Statement of Sources of Income

Maine law requires candidates not currently serving in the Legislature to file a Statement of Sources of Income (SOSOI) covering income received during 2021. 1 M.R.S. § 1016-C. This includes your employer, self-employment, any business you own, retirement income, stock dividends, etc. You only need to disclose the sources, not the amounts received from them. The law also requires the same information for all members in your household including significant others and children. In addition to income sources, you must disclose any positions held in for-profit or non-profit organizations and political committees.

The statement for 2021 is due **Monday, August 15, 2022 by 5:00 p.m.** and is filed electronically. This email has been sent to the address we have on file for your disclosure statement, and by the end of this week you will receive your login credentials from [ethics@maine.gov](mailto:ethics@maine.gov). Sometimes these emails are filtered into spam or junk folders, so please check those folders if you do not see them by Saturday morning.

From start to finish, we estimate it will take you 10 minutes to file the SOSOI and we've created [filing instructions](#) to assist you. The e-filing system for the SOSOI, uses different login credentials than your campaign finance reports but has a similar look and feel. You'll know that you've logged into the SOSOI site when you see a purple banner with "Ethics Disclosure" at the top of the screen.

If you have any questions, please call Commission Assistant Julie Aube at 287-4179 or email [ethics@maine.gov](mailto:ethics@maine.gov).

## Currier, Martha

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**From:** Currier, Martha  
**Sent:** Monday, August 1, 2022 9:29 AM  
**To:** bfd52@icloud.com  
**Subject:** ACTION NEEDED - 2nd NOTICE - Ethics SOSOI - Due 8/15/2022

To: Mrs. Nancy Piche  
From: Martha Currier, Assistant Director  
Maine Commission on Governmental Ethics and Election Practices  
Date: August 1, 2022  
Re: **SECOND NOTICE** - Legislative Candidate Statement of Sources of Income

This is a reminder that your Statement of Sources of Income (SOSOI) for 2021 has not been filed yet and is due in two weeks on **August 15, 2022 by 5:00 p.m.** pursuant to 1 M.R.S. § 1016-C. This disclosure is required for all legislative candidates; currently elected officials filed SOSOIs earlier this year.

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Your SOSOI username is **NPiche02**. If you do not know your password, you can request a reminder from the login page to be sent to the same email address as this notice. The password will come from [ethics@maine.gov](mailto:ethics@maine.gov), and is sometimes re-routed to spam or junk folders, so please check those if you do not see an email within 10 minutes.

You do not need to report amounts, but must disclose the sources of your household income, including your employer, self-employment, any business you own, retirement income, stock dividends, etc. The law also requires the same information for all members in your household including significant others and children. Additionally, you must disclose any positions held in for-profit or non-profit organizations and political committees.

Please file your SOSOI as soon as possible. If you have any questions, please call Commission Assistant Julie Aube at 287-4179 or email [ethics@maine.gov](mailto:ethics@maine.gov).

## Currier, Martha

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**Sent:** Monday, August 15, 2022 9:15 AM  
**To:** bfd52@icloud.com  
**Subject:** ETHICS DEADLINE TODAY BY 5:00 p.m. - Ethics SOSOI

To: Mrs. Nancy Piche  
From: Martha Currier, Assistant Director  
Maine Commission on Governmental Ethics and Election Practices  
Date: August 15, 2022  
Re: **DEADLINE TODAY - Legislative Candidate Income Statement due by 5:00 p.m.**

You are receiving this notice because you have not yet filed your 2021 Statement of Sources of Income (SOSOI), which is due **today by 5:00 p.m.** pursuant to 1 M.R.S. § 1016-C. This disclosure is required for all legislative candidates; currently elected officials filed SOSOIs earlier this year.

Your SOSOI username is **NPiche02**. If you do not know your password, you can request a reminder from the [login page](#) to be sent to the same email address as this notice. The password will come from [ethics@maine.gov](mailto:ethics@maine.gov), and is sometimes re-routed to spam or junk folders, so please check those if you do not see an email within 10 minutes.

Please use the [filing instructions](#) to assist you. The e-filing system for the SOSOI, uses different login credentials than your campaign finance reports but has a similar look and feel. You'll know that you've logged into the SOSOI site when you see a purple banner with "Ethics Disclosure" at the top of the screen.

You do not need to report amounts, but must disclose the sources of your household income, including your employer, self-employment, any business you own, retirement income, stock dividends, etc. The law also requires the same information for all members in your household including significant others and children. Additionally, you must disclose any positions held in for-profit or non-profit organizations and political committees.

If you have any questions, please call Commission Assistant Julie Aube at 287-4179 or email [ethics@maine.gov](mailto:ethics@maine.gov).

**The penalty for failing to file an SOSOI can be subject to a civil violation and assessed a fine up to \$100. (1 M.R.S. § 1016-G)**

## Currier, Martha

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**From:** Currier, Martha  
**Sent:** Tuesday, August 16, 2022 1:20 PM  
**To:** bfd52@icloud.com  
**Subject:** PAST DUE - Ethics SOSOI  
**Attachments:** Piche, Nancy SOSOI Initial.pdf

**Importance:** High

Ms. Piche,

Please find attached a notice from the Ethics Commission regarding your past due Statement of Sources of Income.

Sincerely,  
Martha Currier  
Assistant Director  
Maine Ethics Commission  
135 S.H.S.  
Augusta, ME 04333-0135  
Direct (207) 287-3024  
Main (207) 287-4179





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

August 16, 2022

Mrs. Nancy Germaine Piche  
19 Evergreen Drive  
North Waterboro, ME 04061

Re: Violation Notice – 2021 Statement of Sources of Income

Dear Mrs. Piche:

Your 2021 Statement of Sources of Income (SOSOI) covering 1/1/2021 – 12/31/2021 is past due pursuant to 1 M.R.S. § 1016-C.

Failing to file a statement within 15 days of having been notified by the Commission is a civil violation for which a fine up to \$100 may be assessed. 1 M.R.S. § 1016-G(3)(A).

To avoid a penalty, please file this report no later than Wednesday, August 31, 2022. If the statement is not filed by that date, the Commission will consider whether to find you in violation of the statute and assess a penalty at a future meeting.

If you require assistance using our electronic filing system to file your final SOSOI please contact Commission Assistant Julie Aube at 287-4179.

Sincerely,

A handwritten signature in black ink that reads "Martha Currier".

Martha Currier  
Assistant Director

**§1016-C. Reports by legislative candidates**

A candidate, as defined in Title 21-A, section 1, subsection 5, for the Legislature who is not required to file a report under section 1016-G shall file a report containing the same information required of Legislators under section 1016-G no later than 5 p.m. on August 15th preceding the general election unless the candidate withdraws from the election in accordance with Title 21-A, section 374-A by that date. [PL 2021, c. 132, §1 (AMD).]

**SECTION HISTORY**

PL 1991, c. 880, §2 (NEW). PL 2011, c. 471, §4 (AMD). PL 2011, c. 634, §8 (AMD). PL 2021, c. 132, §1 (AMD).

**§1016-G. Disclosure of specific sources of income, interests and reportable liabilities**

Each Legislator shall annually file with the commission a statement identifying the sources of income received, positions held and reportable liabilities incurred during the preceding calendar year by the Legislator or members of the Legislator's immediate family. A Legislator who has completed service in the Legislature shall file the statement within 45 days of the Legislator's last day of service to disclose the sources of income in the Legislator's final calendar year of service. [PL 2011, c. 634, §11 (NEW).]

**1. Content of statement.** The name and, where applicable, the job title of the individual earning or receiving the income must be disclosed, unless otherwise noted. Each source of income must be identified by name, address and principal type of economic or business activity. If disclosure of this type is prohibited by statute, rule or an established code of professional ethics, it is sufficient for the Legislator to specify the principal type of economic or business activity from which the income is derived.

The statement must identify:

- A. If the Legislator is an employee of another person, firm, corporation, association or organization that has provided the Legislator with compensation of \$2,000 or more, the name and address of the employer. The Legislator shall identify the title and position held by the Legislator; [PL 2011, c. 634, §11 (NEW).]
- B. If the Legislator is self-employed, the name and address of the Legislator's business and each source of income derived from self-employment that represents more than 10% of the Legislator's gross income from self-employment or \$2,000, whichever is greater; [PL 2011, c. 634, §11 (NEW).]
- C. The name, address and principal economic or business activity of any corporation, partnership, limited liability company or other business in which the Legislator or members of the Legislator's immediate family own or control, directly or indirectly, more than 5% of the outstanding equity, whether individually or in the aggregate, that has received revenue of \$2,000 or more; [PL 2013, c. 401, §1 (AMD).]
- D. Each source of income of \$2,000 or more the Legislator derived from providing services as an attorney, the major areas of law practiced by the Legislator and, if associated with a law firm, the major areas of practice of the firm; [PL 2011, c. 634, §11 (NEW).]
- E. Each source of income of \$2,000 or more received by the Legislator and a description of the nature of the income, such as rental income, dividend income and capital gains; [PL 2013, c. 401, §1 (AMD).]
- F. The specific source of each gift received by the Legislator; [PL 2011, c. 634, §11 (NEW).]

G. Each source of income of \$2,000 or more received by any member of the immediate family of the Legislator, except that the Legislator is not required to identify the names of dependent children. If the member of the Legislator's immediate family received income of \$2,000 or more in compensation, the Legislator shall identify the source of the compensation, the type of the economic activity and the title of the position held by the immediate family member; [PL 2011, c. 634, §11 (NEW).]

H. Each source of honoraria of \$2,000 or more that the Legislator accepted; [PL 2011, c. 634, §11 (NEW).]

I. Each executive branch agency before which the Legislator or any immediate family member has represented or assisted others for compensation; [PL 2011, c. 634, §11 (NEW).]

J. Each state governmental agency, board or commission to which the Legislator, a member of the Legislator's immediate family or an associated organization has sold, rented or leased goods or services with a value of \$10,000 or more during the preceding calendar year and a description of the goods or services sold, rented or leased; [PL 2011, c. 634, §11 (NEW).]

K. Each party as defined in Title 21-A, section 1, subsection 28, including a party committee, and each organization that is required under Title 21-A, chapter 13 to register with the commission as a political action committee or ballot question committee for which the Legislator or a member of the Legislator's immediate family is a treasurer, principal officer or principal fund-raiser or decision maker; [PL 2013, c. 401, §1 (AMD).]

L. Any offices, trusteeships, directorships or positions of any nature, whether compensated or uncompensated, held by the Legislator or a member of the Legislator's immediate family with any for-profit or nonprofit firm, corporation, association, limited liability company, partnership or business. For the purposes of this paragraph, service as a clerk of a corporation or as a registered agent authorized to receive service of any process, notice or other demand for a business entity is not considered a position with the corporation or business entity; and [PL 2011, c. 634, §11 (NEW).]

M. All reportable liabilities incurred by the Legislator or a member of the Legislator's immediate family during the reporting period. [PL 2011, c. 634, §11 (NEW).]  
[PL 2013, c. 401, §1 (AMD).]

**2. Time for filing.** The following provisions govern the time for filing statements.

A. Each Legislator shall file with the commission by 5:00 p.m. on February 15th of each year on the form provided by the commission a statement of the sources of income, interests and reportable liabilities for the preceding calendar year required by subsection 1. Prior to the end of the first week in January of each year, the commission shall deliver a form to each Senator and member of the House of Representatives. [PL 2011, c. 634, §11 (NEW).]

B. A Legislator shall file an updated statement concerning the current calendar year if the income, reportable liabilities or positions of the Legislator or an immediate family member, except for dependent children, substantially change from those disclosed in the Legislator's most recent statement. Substantial changes include, but are not limited to, a new employer that has paid the Legislator or a member of the Legislator's immediate family \$2,000 or more during the current year, another source that has provided the Legislator or a member of the Legislator's immediate family, excluding dependent children, with income that totals \$2,000 or more during the current year or the acceptance of a new position with a for-profit or nonprofit firm that is reportable under subsection 1, paragraph L. The Legislator shall file the updated statement within 30 days of the substantial change in income, reportable liabilities or positions. [PL 2011, c. 634, §11 (NEW).]  
[PL 2011, c. 634, §11 (NEW).]

**3. Penalties.** Penalties for violations of this section are as follows.

A. Failing to file a statement within 15 days of having been notified by the commission is a civil violation for which a fine of not more than \$100 may be adjudged. A statement is not considered filed unless it substantially conforms to the requirements of this subchapter and is properly signed. The commission shall determine whether a statement substantially conforms to the requirements of this subchapter. [PL 2011, c. 634, §11 (NEW).]

B. The intentional filing of a false statement is a Class E crime. If the commission concludes that it appears that a Legislator has willfully filed a false statement, it shall refer its findings of fact to the Attorney General. If the commission determines that a Legislator has willfully failed to file a statement required by this subchapter or has willfully filed a false statement, the Legislator is presumed to have a conflict of interest on every question. [PL 2019, c. 534, §5 (AMD).]  
[PL 2019, c. 534, §5 (AMD).]

**4. Rules, procedures and forms.** The commission may adopt or amend rules to specify the reportable categories or types and the procedures and forms for reporting and to administer this section. Rules adopted pursuant to this subsection are routine technical rules as defined in Title 5, chapter 375, subchapter 2-A.  
[PL 2011, c. 634, §11 (NEW).]

**5. Public record.** Statements filed under this section are public records. The commission shall provide a means for Legislators to file statements in an electronic format that must immediately place the statements on a publicly accessible website. Legislators shall file statements required by this section using the electronic format prescribed by the commission. If a Legislator can attest to an inability to access or use the electronic filing format, the commission may provide assistance to the Legislator to ensure proper and timely placement of the required statements on the publicly accessible website.  
[PL 2013, c. 401, §2 (AMD).]

**SECTION HISTORY**

PL 2011, c. 634, §11 (NEW). PL 2013, c. 401, §§1, 2 (AMD). PL 2019, c. 534, §5 (AMD).