



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

To: Commission  
From: Jonathan Wayne, Executive Director  
Date: June 16, 2020  
Re: Request by Dr. Demi Kouzounas to Investigate 2018 Facebook Ads

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Dr. Demi Kouzounas requests that the Maine Ethics Commission investigate at least six advertisements distributed on Facebook in 2018 which featured messages by the Speaker of the Maine House of Representatives, Sara Gideon. Specifically, she urges the Commission to examine why the Gideon Leadership PAC did not report roughly \$3,300 in expenditures for the ads, and whether the ads amounted to a contribution by the PAC to her 2018 re-election campaign that exceeded the \$400 contribution limit.

Sara Gideon responds that the ads were not intended to influence her re-election to House District #48 in Freeport and Pownal, but were distributed statewide to support her work as Speaker through communicating official statements, press releases, updates on legislation, and other content prepared by legislative staff. The ads themselves, and the website and Facebook page that were linked to in the ads, do not mention elections or voting and do not refer to Speaker Gideon as a candidate. She argues these communications do not constitute contributions to her re-election campaign. The ads were paid for and reported by the PAC belonging to the House Democratic caucus. The Commission staff recommends no further action on this item.

## **LEGAL REQUIREMENTS**

### Standard for Opening a Requested Investigation

The Election Law authorizes the Commission to receive requests for investigation and to conduct an investigation “if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred”:

A person may apply in writing to the commission requesting an investigation as described in subsection 1. The commission shall review the application and shall

make the investigation if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred.

21-A M.R.S. § 1003(2).

#### Definition of Expenditure and Exception for Non-Electoral Communications

The term “expenditure” is defined to mean a “purchase, payment, distribution, loan, advance, deposit or gift of money or anything of value made for the purpose of influencing the nomination or election of any person to state, county or municipal office ....” 21-A M.R.S. § 1012(3)(A). Payments not made for the purpose of influencing a nomination or election do not qualify as expenditures under this provision. The definition contains a number of exceptions, including “any communication by any person that is not made for the purpose of influencing the nomination for election, or election, of any person to state, county or municipal office ....” 21-A M.R.S. § 1012(3)(B)(6). (ETH-103).

#### Definition of Contribution

The term “contribution” is defined to mean a “gift, subscription, loan, advance or deposit of money or anything of value made for the purpose of influencing the nomination or election of any person to state, county or municipal office or for the purpose of liquidating any campaign deficit of a candidate ....” 21-A M.R.S. § 1012(2)(A). (ETH-102).

#### Definition of Influence

The term “influence” means to promote, support, oppose or defeat. 21-A M.R.S. § 1012(4-A). (ETH-103)

#### Limit on Contributions to a Candidate

Organizations, such as a PAC or other political committee, may not make contributions to a legislative candidate aggregating more than \$400 per election.<sup>1</sup> 21-A M.R.S. § 1015(2). (ETH-104).

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<sup>1</sup> The contribution limits are adjusted every two years based on the Consumer Price Index as reported by the U.S. Dept. of Labor.

### Expenditures Made in Coordination with a Candidate

Under a provision in the contribution limits statute, if a candidate suggests that someone else spend money to promote the candidate's election or cooperates with that spending, the "coordinated expenditure" constitutes a contribution to the candidate:

Any expenditure made by any person in cooperation, consultation or concert with, or at the request or suggestion of, a candidate, a candidate's political committee or their agents is considered to be a contribution to that candidate.

This is considered to be a contribution to the candidate – even if the candidate did not receive money or anything of value directly from the source. 21-A M.R.S. § 1015(5). (ETH-104).

### Paid for Requirement for Electioneering Communications

When a person makes an expenditure to finance a communication expressly advocating the election or defeat of a clearly identified candidate, the communication must state the name and address of the person who paid for the communication and whether the candidate authorized the communication. 21-A M.R.S. § 1014(1). (ETH-103). If a person finances a communication that names or depicts a candidate and that is disseminated from Labor Day through the general election, the communication must contain the same disclosure. 21-A MRS § 1014(2-A). (ETH-103).

### Duty of PACs to Report Expenditures

PACs are required to report each expenditure made to initiate or influence any campaign, and all other expenditures. 21-A M.R.S. §§ 1060(4) & (7). (ETH-104).

## **REQUEST TO INVESTIGATE BY DR. DEMI KOUZOUNAS**

In a January 28, 2020 letter to the Commission, Dr. Demi Kouzounas urged the Commission to investigate at least six Facebook ads from 2018 featuring messages from Speaker Sara Gideon. Profiles of each ad (Facebook's "ad details") are contained in Exhibit C to her letter.<sup>2</sup> (ETH – 1-49). Some of the ads link to [www.speakersaragideon.com](http://www.speakersaragideon.com), which includes press releases and other content prepared by the communications staff of the Speaker's Office or the House

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<sup>2</sup> To review the advertisements which are pertinent to Dr. Kouzounas's complaint, the Commission staff suggests examining Exhibit C rather than Exhibit A which contains images of ads that are unrelated.

Democratic caucus. One of the ads linked to Speaker Gideon’s Facebook page. We recommend viewing each ad through the Facebook ad library for [that account](#) and clicking on the links to review [www.speakersaragideon.com](http://www.speakersaragideon.com) and the Speaker’s Facebook page. (The Commission staff has prepared a chart summarizing the ads, attached as ETH – 88.)

*Allegation that Gideon Leadership PAC did not disclose expenditures.* Each Facebook ad contains a notation by Facebook that the message was “Sponsored” and “Paid for by Gideon Leadership PAC”:



The Facebook ad library states that the total spent by Speaker Gideon’s webpage from May 2018 to the present is \$3,373. (ETH –14). This amount happens to be roughly \$100 more than a \$3,272.80 expenditure entry which the Commission staff administratively entered in the PAC’s final campaign finance report on June 20, 2019, in order to bring the PAC’s cash balance to zero so that the PAC could terminate its financial reporting.<sup>3</sup> (ETH –49). Based on this evidence, Dr. Kouzounas concludes that the Gideon Leadership PAC spent \$3,373 to Facebook that it never reported and requests the Commission to investigate whether the PAC violated 21-A M.R.S. § 1060 by failing to report all of its expenditures. (ETH –1).

*Allegation of over-the-limit contribution to Sara Gideon.* Dr. Kouzounas asserts that “the content of [the] PAC’s advertisements promoted Sara Gideon’s personal qualifications and record largely in the run up to her reelection to the Legislature in 2018 ...” (ETH – 2). She concludes that the ads were designed to promote her re-election to House District #48 and represents a contribution to her campaign. (ETH – 2). Because Sara Gideon is a principal officer of Gideon Leadership PAC, Dr. Kouzounas argues, the PAC’s spending was coordinated with the Speaker and represents a coordinated expenditure, which is a contribution under 21-A M.R.S. § 1015(5). (ETH – 3).

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<sup>3</sup> The rationale for the entry is discussed in the final section of this memo.

## **RESPONSE BY SPEAKER SARA GIDEON**

Sara Gideon responds through a March 23, 2020 letter<sup>4</sup> by attorney Benjamin K. Grant and Washington counsel at Perkins Coie LLP. (ETH – 54-87). In 2012, Sara Gideon was first elected to the Maine House of Representatives, District #48, which includes part of Freeport and Pownal. (ETH – 55). She was elected to Speaker of the Maine House of Representatives in 2016. In 2018, she was running for re-election to her fourth term in House District #48. She won 72% of the general election vote, and her nearest competitor won 26%.

In 2018, she was the Principal Officer of two political action committees registered with the Commission: the Gideon Leadership PAC and the House Democratic Campaign Committee. According to Sara Gideon’s response, one type of official expense paid for by both PACs were low-cost Facebook ads created by her official staff, which she describes as follows:

One type of official expense paid for by both the Leadership PAC and HDCC were low-dollar Facebook advertisements produced by the Speaker’s official staff and posted through the Facebook account “Speaker Sara Gideon,” which was used to promote the Maine State Legislature, the Speaker’s Office, and Speaker Gideon in her capacity as Speaker. The “Speaker Sara Gideon” Facebook account and the advertisements run through it were also used to raise awareness about goings-on in Augusta, advertise legislator townhalls across the state, and recruit Mainers to “Stay current on Maine’s topics” by signing up for the official email list of the Speaker’s Office through Speaker Gideon’s official website, [www.speakergideon.com](http://www.speakergideon.com). This official website, which many of the ads linked to, was used to aggregate Speaker Gideon’s and other officials’ press releases and official statements and compile information on important policy topics such as the budget, the economy, education, health care, seniors, and women’s issues.

(ETH – 55-56).

Speaker Gideon explains that the Facebook advertisements were initially purchased with a credit card belonging to the Gideon Leadership PAC (Card A). (ETH – 56). As Exhibit A to her response, she provided five monthly invoices from Facebook (for Feb. - June 2018) paid with this credit card.<sup>5</sup> (ETH – 66-71). Speaker Gideon explains that:

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<sup>4</sup> Note: for reasons of privacy the last four digits of the credit card of the Gideon Leadership PAC have been replaced with “Card A.”

<sup>5</sup> Mary-Erin Casale, who is listed in the header of the Facebook invoices, is the legislative communications director in the Speaker’s Office.

- At some point in July 2018, the Leadership PAC’s credit card appears to have stopped working on Facebook’s payment processing system. (ETH – 56). On July 31, 2018, the system tried to charge \$218.19 to the Gideon Leadership PAC credit card (Card A), but the payment failed (the last invoice in Exh. A). (ETH – 71). At that point, it appears that Facebook’s system tried to charge other credit cards already loaded into the account. Facebook landed on the credit card<sup>6</sup> belonging to the House Democratic Campaign Committee (Card B), which processed the charge. (ETH – 56). Beginning with that charge for \$218.19 at the end of July, Facebook regularly charged the credit card of the House Democratic Campaign Committee for advertising by the Speaker Sara Gideon account. These invoices are included in Exh. B to Sara Gideon’s response. (ETH – 73-87).
- Even though Facebook began charging the credit card of the House Democratic Campaign Committee, Facebook continued to apply the same default disclaimer (“Paid for by Gideon Leadership PAC”) to the advertisements. (ETH – 56). Neither Facebook nor Speaker Gideon’s staff updated the disclaimer to reflect that the ads were actually paid for by the House Democratic Campaign Committee. (ETH – 56). The Commission staff does not know enough about Facebook’s account set-up to assess how easily this could have been controlled by the Speaker’s staff (presuming that the staff was aware of the discrepancy).

Speaker Gideon argues the payments for Facebook ads cannot be considered “expenditures” (as that term is defined in Maine campaign finance law) because the payments were not “made for the purpose of influencing the nomination or election of any person to state, county or municipal office.” 21-A M.R.S. § 1012(3)(A). (ETH – 60). Rather, she argues, the payments were intended to support her work as the Speaker of the Maine House of Representatives. As such, the payments were covered by the exception for “communications not made for the purpose of influencing the election of any person to state office.” (ETH – 60).

Speaker Gideon cites a number of factual circumstances to rebut the inference that the advertising’s purpose was to re-elect her to House District #48:

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<sup>6</sup> Note: the last four digits of the credit card attributed to the House Democratic Campaign Committee have been replaced with “Card B.”

- The ads exclusively refer to Sara Gideon as Speaker of the House and not as a candidate facing re-election. (ETH – 60).
- The ads were created and distributed by the staff in the Speaker’s office and the House Democratic caucus. The messaging of the advertisements relate to the official work of Speaker Gideon and the Maine Legislature. (ETH – 60-61).
- The ads were run statewide and were not targeted toward Speaker Gideon’s House district in Freeport and Pownal. (ETH – 60).
- No mention of the 2018 general election was made in any of the ads that ran before the day of the election, November 6, 2018. (ETH – 60).
- Some of the ads ran after the November 6, 2018 general election, and therefore could not have been intended to influence the vote in the election. (ETH – 61).

Sara Gideon asserts that it was not necessary for her turn to her leadership PAC and the House Democratic Campaign Committee to pay for advertising to promote her re-election. Her campaign committee had collected sufficient campaign funds to meet her communication needs, and in October 2018 her campaign contributed \$1,600 to the House Democratic Campaign Committee. (ETH – 62). In the general election, she won with 72% of the vote.

## **DISCUSSION AND STAFF RECOMMENDATION**

After considering the financial information and legal argument submitted by Sara Gideon’s counsel, the Commission staff recommends taking no further action on Dr. Kouzounas’s complaint.

*Financial reporting.* In Exhibit B of her response, Sara Gideon has provided fourteen Facebook invoices in connection with the advertisements in Dr. Kouzounas’s complaint, all marked paid with the credit card of the House Democratic Campaign Committee (Card B). (ETH – 73-87). The House Democratic Campaign Committee disclosed making all of these payments as expenditures in campaign finance reports submitted to the Commission (*see* pages from the

PAC's campaign finance reports attached as ETH – 89-101).<sup>7</sup> Because the payments were reported on time by the House Democratic Campaign Committee, we see no need to investigate whether there was any reporting violation of 21-A M.R.S. § 1060. (ETH – 104).

*Allegation of over-the-limit in-kind contribution.* The staff of the Ethics Commission staff does not recommend any further investigation of whether the Facebook advertisements represented an in-kind contribution to Speaker Gideon's re-election campaign to House District #48. Elected officials and the legislative caucuses have a legitimate interest in communicating their political agendas and accomplishments to their constituents – apart from their members' campaigns for re-election. The evidence cited by Speaker Gideon concerning the content of the ads and their timing and geographic distribution support her argument that these communications were intended to support her work as Speaker of the Maine House of Representatives rather than promoting her re-election to voters in Freeport and Pownal. (ETH – 60-62). We agree with her argument that the ad purchases were not "expenditures" under 21-A M.R.S. § 1012(3)(A) because they lacked the requisite electoral purpose. (ETH – 60-62, 102). Accordingly, her participation in this financial activity did not result in a contribution under 21-A M.R.S. § 1015(5). (ETH – 104).

We note that all four party caucuses in the Maine Legislature have created websites that include elements such as Legislator profiles, press releases, official statements, legislative news, or policy statements. The caucuses have presumably viewed these as constituent communications (not subject to campaign finance regulation), as long as the website content is focused on legislative topics and contains no electioneering. It would upset widespread expectations if the Commission were to view these paid communications as contributions to the officials' re-election campaigns.

#### *Compliance with Disclaimer Requirements for Paid Electioneering Communications*

Some of the Facebook ads included an erroneous statement by Facebook that the ads were paid for by the Gideon Leadership PAC, even though they were financed by the House Democratic Campaign Committee. While this is regrettable, the staff believes this does not amount to a legal violation. Title 21-A, section § 1014 requires certain paid communications referring to a

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<sup>7</sup> Please note that the first two invoices in Exh. B (\$218.19 and \$2.33) were satisfied with a single payment of \$220.52. (ETH – 74-75, 89).



candidate to identify the person who financed the communication and a statement whether or not the candidate authorized the expenditures for the communication.<sup>8</sup> (ETH – 103).

The Facebook ads raised by Dr. Kouzounas are not covered by the requirements in 21-A M.R.S. §§ 1014(1) & (2) because the advertisements do not expressly advocate the election or defeat of Sara Gideon or any other candidate. (ETH – 103). Subsection 2-A of 21-A M.R.S. § 1014 requires the same disclosure statement for paid communications naming or depicting a clearly identified candidate that are disseminated between Labor Day and the day of the general election, even if the communications do not contain express advocacy. (ETH – 103). This provision, however, contains an exception: “The disclosure is not required if the communication was not made for the purpose of influencing the candidate’s nomination for election or election.” (ETH – 103).

It appears that four of the Facebook ads may have been disseminated between Labor Day and the general election during 2018. (ETH – 88). The Commission staff accepts, however, that these communications were not made for the purpose of influencing Sara Gideon’s re-election to House District #48, so we believe that the “paid for” requirement does not apply to the Facebook ads. Nevertheless, whether legally required or not, “paid for” disclosure statements do help the public understand who is funding political communications. We hope this episode will serve as a reminder that some attention needs to be paid to the automated Facebook disclosure statement to make sure the account name applied by Facebook conforms to the actual source that has funded the ads.

#### *Staff Practice of Adjustments to Financial Reporting by PACs*

For your information, shortly before June 20, 2019, the Commission staff was approached by the treasurer of the Gideon Leadership PAC. The PAC wished to terminate, but there was a \$3,270 discrepancy between the balance displayed in the financial activity summary on the cover page of the PAC’s campaign finance reports and the PAC’s actual bank balance. (In order to terminate, the cash balance in the summary must be zero.) The treasurer explained that the PAC

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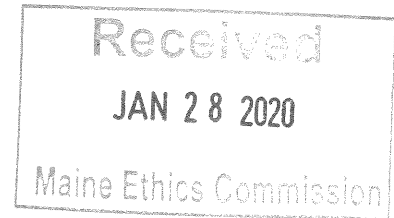
<sup>8</sup> Dr. Kouzounas has not alleged a violation of 21-A M.R.S. § 1015, but the staff is addressing the issue in this memo in case it comes up at your June 24 meeting.

had been financially active for six years, including prior to his appointment as treasurer and his ready access to bank records. He was unable to find the source of the \$3,270 discrepancy.

The Commission staff conducted an overview of the PAC's financial reporting. During its six-year history, the PAC had reported receiving 455 contributions totaling \$272,289 and making 286 expenditures totaling roughly that same amount. The Commission staff determined it was impractical to require the current treasurer to audit more than 740 contributions and expenditures totaling \$540,000 to identify a \$3,270 discrepancy, which represented less than 1% of the financial activity the treasurer would need to review. Consequently, we administratively entered an expenditure of \$3,272.80 dated June 20, 2019, to allow the PAC to dissolve. (ETH – 49).

In the past five years, the Commission staff has entered nine staff adjustments greater than \$250 for PACs that, after diligently searching, could not find the source of a discrepancy between the cash balance in its financial activity summary and actual bank balance. At the June 24, 2020 meeting, we will be happy to answer any questions that you have concerning this practice.

Thank you for your attention to this agenda item.



January 28, 2020

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

Re: Request for Investigation Into Apparent Additional Campaign Finance Violations by Sara Gideon's 2018 Campaign Committee and Gideon Leadership PAC

Dear Mr. Wayne:

Based on publicly available records, Gideon Leadership PAC apparently failed to disclose expenditures for at least six Facebook ad campaigns—many of which were published statewide in the weeks immediately prior to the 2018 election—that totaled thousands of dollars. In addition, the undisclosed expenditures appear to have funded ads that promoted Sara Gideon and therefore amount to in-kind contributions to Gideon's 2018 legislative campaign committee, which well exceed the \$400 per election contribution limit established by Me. Rev. Stat. tit. 21-A, § 1015(2). Therefore, we request that the Commission undertake an immediate investigation of this activity in accordance with Me. Rev. Stat. tit. 21-A, §§ 1003(1) and (2) and 94-270 C.M.R. ch. 1 § 4(2)(C).

### FACTS

In 2018, news reports and Facebook ad records indicate that Gideon Leadership PAC sponsored multiple Facebook advertisements promoting Sara Gideon that carried the disclaimer "Paid for by Gideon Leadership PAC." *See* Exhibit A. Yet, Gideon's state campaign committee did not report the receipt of any in-kind contribution from Gideon Leadership PAC during this time period; nor did the campaign make any disbursements to Facebook directly for any such advertising.<sup>1</sup> According to Facebook's ad library, Gideon Leadership PAC spent \$3,373 on Facebook advertising from May 2018 through July 25, 2019. During that same time period, Gideon Leadership PAC reports just \$461.55 in disbursements to Facebook. *See* Exhibit B. Indeed, Gideon Leadership PAC reports no disbursements to Facebook after July 2, 2018, yet Facebook's ad library indicates that Gideon Leadership PAC paid for six ads that ran after July 2, 2018. *See* Exhibit C. Furthermore, when Gideon Leadership PAC terminated earlier this year and zeroed out its balance, the committee's July 2019 quarterly report reflects an expenditure labeled "Commission Staff adjustment" in the amount of \$3272.80. *See* Exhibit D. Presumably the Gideon Leadership PAC had failed to report some prior expenditure of funds and therefore had to include an adjusting entry on its July 2019 termination report in order to bring its balance to \$0. This adjustment, combined with the records available on Facebook's ad library, strongly suggest that the PAC failed to report approximately \$3,300 in expenditures for Facebook advertising to promote Sara Gideon's reelection in violation of Me. Rev. Stat. tit. 21-A, §1060.

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<sup>1</sup> The filings of Gideon Leadership PAC and Sara Gideon 2018 Legislative Candidate Committee are available at: <https://mainecampaignfinance.com/#/exploreCommitteeDetail/4851> and <https://mainecampaignfinance.com/#/exploreDetails/5886/11/83/32/2018>.

Furthermore, there is reason to believe that the ads, which promoted Sara Gideon largely in the months prior to her 2018 reelection campaign, constituted excessive in-kind contributions to Sara Gideon's 2018 legislative candidate committee in violation of Me. Rev. Stat. tit. 21-A, §1015.

As detailed in Exhibits C and D, Facebook's Ad Library indicates that Gideon Leadership PAC disseminated six advertisements bearing the disclaimer "Paid for Gideon Leadership PAC" between July 2, 2018 and December 31, 2018. *See* Exhibits C and D. These archives also indicate that the PAC spent approximately \$3,373 on Facebook advertising from May 2018 through July 25, 2019. *Id.* Nevertheless, Gideon Leadership PAC does not report any corresponding disbursements to Facebook during the time period in which Facebook's archives indicate that the ads ran. *See* Exhibits C and D. Thus, the Commission needs to investigate whether the PAC violated Me. Rev. Stat. tit. 21-A, § 1060(4), which requires political action committees to itemize and report "each expenditure made to initiate or influence any campaign." In this review, the Commission needs to consider the fact that the PAC's July 2019 quarterly report in which it zeroed out its balance and terminated its activities, acknowledges that there was some unreported expenditure(s) totaling \$3272.80 therefore requiring the Commission staff to create an expenditure entry labeled "Commission Staff adjustment" in order to balance the PAC's books. *See* Exhibit D. Given that this adjustment is within approximately \$100 of the total amount that Facebook reports the PAC paid for digital advertisements but cannot be found on the PAC's disclosure reports, it is likely that this adjustment represents the amount that the PAC spent on Facebook but failed to disclose on its finance reports. In sum, it appears that Gideon Leadership PAC failed to fully disclose its activities in compliance with state law and that the public record is therefore incomplete. Given that Gideon Leadership PAC disclosed Facebook advertising purchased on behalf of state candidates *other* than Sara Gideon<sup>2</sup>, the Commission also needs to investigate whether this was an intentional omission in order to avoid reporting an impermissible in-kind contribution to Sara Gideon as described in greater detail below.

Indeed, the Facebook advertising records, which include the full text and video of the PAC's ads, provide reason to believe that the PAC may have made excessive contributions to Sara Gideon's 2018 legislative candidate committee in violation of Me. Rev. Stat. tit. 21-A, § 1015, which limits contributions from a PAC to candidate committee to \$400 per election. Based on a review of the advertisements on the Facebook archive at Exhibit A, the content of PAC's advertisements promoted Sara Gideon's personal qualifications and record largely in the run up to her reelection to the Legislature in 2018 and were made for the purpose of influencing the 2018 election. Under Maine law, a "contribution" is "anything of value made for the purpose of influencing the nomination or election of any person to state, county or municipal office." Me. Rev. Stat. tit. 21-A, § 1012(2)(A). Furthermore, "influence" means "to promote, support, oppose or defeat." Me. Rev. Stat. tit. 21-A, § 1012(4A). There can be no question that the advertising, which touted Gideon's biography and record in the Legislature, were designed to promote her reelection and therefore represent a contribution within the meaning of that term under Maine law. Nor can the PAC's expenditures cannot be considered an "independent

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<sup>2</sup> *See* disclosures of Gideon Leadership PAC reporting expenditures for digital advertising on behalf of Jeffrey Evangelos, Walter N. Riseman, Anne B. Gass, William D. Pluecker, available at: <https://mainecampaignfinance.com/ReportOutputFiles/02/2018/e12c4628-1708-43b5-a27c-ae43bcecb630.pdf>.

expenditure” as defined by Maine law because they were authorized by Sara Gideon, at once the PAC’s principal officer and decision-maker and a candidate for reelection to the Legislature in 2018. Maine law makes clear that “any expenditure made by any person in cooperation, consultation or concert with, or at the request or suggestion of, a candidate, a candidate’s political committee or their agents is considered to be a contribution to that candidate” and is not an independent expenditure. Me. Rev. Stat. tit. 21-A, § 1015(5). As the principal officer of Gideon Leadership PAC, Sara Gideon participated in the PAC’s spending decisions at the same time she was a candidate for office. As such, there can be no doubt that the PAC’s spending on social media advertising, as authorized by Gideon, was clearly made in “cooperation with the candidate [Gideon]” and constitutes a contribution to Sara Gideon’s 2018 campaign.

Although the exact amount that Sara Gideon authorized her PAC to spend on digital advertising to promote her own candidacy for the legislature is in dispute in light of the discrepancies between Facebook’s records and the PAC’s disclosures, based on either accounting, the PAC’s expenditures for these ads were well in excess of \$400 and therefore in violation of the state’s \$400 per election contribution limit for contributions from a PAC to a candidate committee. *See* Me. Rev. Stat. tit. 21-A, § 1015. In light of these facts, the Commission needs to investigate whether the reports filed by Gideon Leadership PAC were complete and accurate and whether the advertisements that the PAC failed to disclose actually constitute contributions to Sara Gideon’s 2018 Legislative Candidate Committee in violation of the \$400 per election contribution limits.

Should the Commission determine that Gideon Leadership PAC and Sara Gideon’s 2018 candidate campaign committee violated the law, it should impose the appropriate sanctions and penalties as required by law. Thank you for your prompt review of this matter.

Sincerely,



Dr. Demi Kouzounas

# EXHIBIT A



gideon leadership ✕ 🔍


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Search results display ads with text that matched your keyword search term. Only ads about social issues, elections or politics are included.

**Filter By:** United States ▼ Active and Inactive ▼ All Pages ▼

**Launched December 2018**

Inactive  
Dec 19, 2018 - Dec 29, 2018

 About social issues, elections or politics

 **Speaker Sara Gideon**  
Sponsored • Paid for by Gideon Leadership PAC

One year ago, the US Senate passed a disastrous bill that that has had negative impacts across the board and Maine's senator cast the lynchpin vote. I couldn't let this day go by without reminding Mainers of...




Mainers deserve a senator who will...  
In reality, Collins' vote on the tax bill was a...  
BANGORDAILYNEWS.COM [Learn More](#)

[See Ad Details](#)



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Inactive  
Nov 7, 2018 - Nov 14, 2018

 About social issues, elections or politics



**Speaker Sara Gideon**  
Sponsored • Paid for by Gideon Leadership PAC


Last night's results mean we can truly get to work improving the lives of Maine people. Democrats not only strengthened the House majority, we increased it by 16 seats. I'm al... [increase-majority/](#)



Speaker Sara Gideon [Sign Up](#)

[See Ad Details](#)

Inactive  
Nov 6, 2018 - Nov 7, 2018

 About social issues, elections or politics



**Speaker Sara Gideon**  
Sponsored • Paid for by Gideon Leadership PAC


Both this morning and at the end of today, here's what I'm thinking and what I'll continue to carry forward in my heart. I believe in the goodness of people. I believe in our resilience, our ability to learn...



Speaker Sara Gideon [Sign Up](#)

[See Ad Details](#)

Inactive  
Nov 5, 2018 - Nov 7, 2018

 About social issues, elections or politics




**Paula Sutton for Maine State Representative**  
Sponsored • Paid for by Committee to Elect Paula...

An advertisement paid for by my political action committee on the topic of female genital mutilation/cutting (FGM/C) has evoked strong reactions from the local community. Like many Mainers, I was...

[See Ad Details](#)

## Launched October 2018

Inactive  
Oct 27, 2018 - Nov 6, 2018


 About social issues, elections or politics



**Maine Votes**  
Sponsored • Paid for by the Gideon Leadership PAC, 37...

Bill Pluecker will fight for our kids in Augusta. Vote to protect Maine schools on Nov. 6!

Inactive  
Oct 27, 2018 - Nov 6, 2018


 About social issues, elections or politics



**Maine Votes**  
Sponsored • Paid for by the Gideon Leadership PAC, 37...

Jeff Evangelos will fight for our kids in Augusta. Vote to protect Maine schools on Nov. 6!

Inactive  
Oct 18, 2018 - Oct 27, 2018

 About social issues, elections or politics



**Speaker Sara Gideon**  
Sponsored • Paid for by Gideon Leadership PAC

Serving as the Speaker of the House is both the most rewarding and the most challenging job I've ever held. Every single day I'm inspired by and so proud serve alongside my colleagues, the [Maine Hou...](#)





Learn more here:  
Paid for by the Gideon  
Leadership PAC, 37...  
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Oct 27, 2018 - Nov 6, 2018



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**Maine Votes**

Sponsored • Paid for by the  
Gideon Leadership PAC, 37...

Bill Pluecker will fight for our  
kids in Augusta. Vote to protect  
Maine schools on Nov. 6!



Learn more here:  
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Oct 27, 2018 - Nov 6, 2018



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**Maine Votes**

Sponsored • Paid for by the  
Gideon Leadership PAC, 37...

Walter Riseman will fight for our  
kids in Augusta. Vote to protect  
Maine schools on Nov. 6!



Speaker Sara  
Gideon  
Government Official  
5,178 people like this

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● Inactive

Oct 27, 2018 - Nov 6, 2018



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**Maine Votes**

Sponsored • Paid for by the  
Gideon Leadership PAC, 37...

Jeff Evangelos will fight for our  
kids in Augusta. Vote to protect  
Maine schools on Nov. 6!



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● Inactive

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**Maine Votes**

Sponsored • Paid for by the  
Gideon Leadership PAC, 37...

Anne Gass will fight for our kids  
in Augusta. Vote to protect



Learn more here:  
Walter Riseman for  
State Representative:...  
MAINEVOTERS2018.COM

[Learn More](#)

[See Ad Details](#)

● Inactive

Oct 27, 2018 - Oct 28, 2018



About social issues,  
elections or politics



**Message**

Sponsored • Paid for by Tim  
D'Annunzio

The LORD said unto Gideon,  
The people that are with you are



Learn more here:  
Jeff Evangelos for  
State Representative:...  
MAINEVOTERS2018.COM

[Learn More](#)

[See Ad Details](#)

● Inactive

Oct 25, 2018 - Oct 26, 2018



About social issues,  
elections or politics



**Message**

Sponsored • Paid for by Tim  
D'Annunzio

Then will I make their waters  
deep, and cause their ~~ETHERS~~ to

Maine schools on Nov. 6!



Learn more here:  
Anne Gass for State  
Representative...  
MAINEVOTERS2018.COM

[Learn More](#)

[See Ad Details](#)

too many for Me to give the  
Midianites into their hands, lest  
Israel vaunt themselves against  
Me, saying, Mine own hand has  
saved me



[See Ad Details](#)

run like oil, says the LORD God.

The above is Ezekiel 32:14  
speaking of same as is written in  
Isaiah 40:27 which says "And



[See Ad Details](#)

## Launched September 2018

● Inactive

Sep 7, 2018 - Sep 14, 2018



About social issues,  
elections or politics



**Speaker Sara Gideon**

Sponsored • Paid for by  
Gideon Leadership PAC

Want to stay updated on the  
latest news from the Speaker's  
Office? Sign up for our list by  
visiting  
[www.speakergideon.com](http://www.speakergideon.com)



Speaker Sara Gideon

[Sign Up](#)

[See Ad Details](#)



## Launched August 2018

● Inactive

Aug 7, 2018 - Aug 14, 2018



About social issues, elections or politics



**Speaker Sara Gideon**

Sponsored • Paid for by Gideon Leadership PAC

Want to learn more about what I've been working on? Sign up for our email list at [www.speargideon.com](http://www.speargideon.com)



[See Ad Details](#)

## Launched July 2018

● Inactive

Started running on Jul 16, 2018



About social issues, elections or politics



**Speaker Sara Gideon**

Sponsored • Paid for by Gideon Leadership PAC

Learn more about Maine's Speaker of the House and the current news from our Capitol.



Speaker Sara Gideon  
Government Official  
5,178 people like this



[See Ad Details](#)

● Inactive

Jul 6, 2018 - Jul 9, 2018



About social issues, elections or politics



**Run Aaron Run**

Sponsored • Paid for by and authorized by Run Aaron Ru...

[Sheldon Hanington](#) is a veteran who agrees that #GideonMustGo - and is offended that Failed @Speaker Sara Gideon called him & Paul LePage, Maine's Governor terrorists. ... [RunAaronRun.com](http://RunAaronRun.com)



● Inactive

Jul 1, 2018 - Jul 8, 2018



About social issues, elections or politics



**Run Aaron Run**

Sponsored • Paid for by and authorized by Run Aaron Ru...

[Sheldon Hanington](#) is a veteran who agrees that #GideonMustGo - and is offended that Failed @Speaker Sara Gideon called him & Paul LePage, Maine's Governor terrorists. ... [RunAaronRun.com](http://RunAaronRun.com)




Why #FailedSpeaker  
Sara #Gideon Must Go ...  
HTTPS://WWW.CHANGE.ORG/F  
GIDON-NO-CONFIDENCE-IN...  
Sign Up

Why #FailedSpeaker  
Sara #Gideon Must Go ...  
HTTPS://WWW.CHANGE.ORG/F  
GIDON-NO-CONFIDENCE-IN...  
Sign Up

[See Ad Details](#)

[See Ad Details](#)

● Inactive  
Jul 30, 2018 - Aug 13, 2018

 About social issues,  
elections or politics

 **Speaker Sara Gideon**  
Sponsored • Paid for by  
Gideon Leadership PAC

Serving as the Speaker of the House is both the most rewarding and the most challenging job I've ever held. Every single day I'm inspired by and so proud serve alongside my colleagues, the [Maine Hou...](#)




Speaker Gideon and Maine's House Democrats

[See Ad Details](#)

### Launched June 2018


● Inactive  
Started running on Jun 27, 2018

 About social issues,  
elections or politics

 **Speaker Sara Gideon**  
Sponsored • Paid for by  
Gideon Leadership PAC

Speaker Sara Gideon believes that Maine people are our best resource, that our students


● Inactive  
Jun 17, 2018 - Jun 20, 2018

 About social issues,  
elections or politics

 **Aaron From Maine**  
Sponsored • Paid for by and  
authorized by Run Aaron Ru...

Maine is suffering. We don't need partisanship, we need leadership.

● Inactive  
Jun 26, 2018 - Jul 3, 2018

 About social issues,  
elections or politics

 **Run Aaron Run**  
Sponsored • Paid for by and  
authorized by Run Aaron Ru...

Momentum is building. Please encourage your Representatives in the House of Reps to hold a



deserve our investment and that fostering innovation and entrepreneurship will lead to successful businesses...



Speaker Sara Gideon  
SPEAKERGIDEON.COM

Sign Up

[See Ad Details](#)



NO CONFIDENCE: Gideon Must Go!  
We need a new Speaker of the House - immediately!!!...

[See Ad Details](#)

vote of NO CONFIDENCE in the failed leadership of Speaker Sara Gideon.  
<https://legislature.maine.gov/hou>



Can you spare a minute to help Aaro...  
STEP DOWN SARA!!!  
No confidence in the...  
CHANGE.ORG

[Learn More](#)

[See Ad Details](#)

Inactive

Jun 22, 2018 - Jun 25, 2018



About social issues, elections or politics



Run Aaron Run

Sponsored • Paid for by and authorized by Run Aaron Ru...

Momentum is building. Please encourage your Representatives in the House of Reps to hold a vote of NO CONFIDENCE in the failed leadership of Speaker Sara Gideon.  
<https://legislature.maine.gov/hou>

Inactive

Jun 19, 2018 - Jun 20, 2018



About social issues, elections or politics



Run Aaron Run

Sponsored • Paid for by and authorized by Run Aaron Ru...

PLEASE SHARE - "OWEN for SPEAKER" - Today the Maine Legislature has an opportunity to reject the FAILED LEADERSHIP of Speaker Sara Gideon. Owen Casas is a patriot (IRAQ veteran) who has worke...

Inactive

Jun 17, 2018 - Jun 20, 2018



About social issues, elections or politics



Run Aaron Run

Sponsored • Paid for by and authorized by Run Aaron Ru...

SIGN THE PETITION: NO CONFIDENCE IN Sara Gideon - When the Legislature returns this week, we can have NO CONFIDENCE that they will get anything done, that they will even start on time, or that they...



Can you spare a minute to help Aaro...  
STEP DOWN SARA!!!  
No confidence in the...  
CHANGE.ORG

[Learn More](#)

[See Ad Details](#)



Run Aaron Run

[Sign Up](#)

[See Ad Details](#)



Sign the Petition  
Sara Gidon: No confidence in the fail...  
CHANGE.ORG

[Learn More](#)

[See Ad Details](#)



## EXHIBIT B

All Ads

Speaker Sara Gideon



Speaker Sara Gideon

@speakergideon

Government Official · 5,384 likes

Page transparency

See More

Page created Sep 26, 2014

Page name changed 1 time

Primary country location for people who manage this Page includes: United States (5)

Total spent by Page on ads about social issues, elections or politics

May 2018 - Dec 5, 2019  
United States

\$3,373

See spend details

Recently spent by Page on ads about social issues, elections or politics

7 days • Nov 29 - Dec 5, 2019  
United States

\$0

Filter By:

United States

Active and Inactive

All Impressions

All Platforms

View:

All Ads

Issue, Electoral or Political



Gideon Leadership PAC April 2018 Quarterly Report –  
<https://mainecampaignfinance.com/ReportOutputFiles/02/FS131482.pdf>

1/2/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA 94025	FACEBOOK	WEB	\$36.04
2/1/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA 94025	FACEBOOK	WEB	\$163.97
3/1/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA 94025	FACEBOOK	WEB	\$56.11

Gideon Leadership PAC 11-Day Pre-Primary Report –  
<https://mainecampaignfinance.com/ReportOutputFiles/02/FS132487.pdf>

4/2/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA 94025	FACEBOOK	WEB	\$61.91
5/1/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA 94025	FACEBOOK	WEB	\$59.93

Gideon Leadership PAC 42-Day Post-Primary Report:  
<https://mainecampaignfinance.com/ReportOutputFiles/02/9cdb9310-c375-40c1-a662-00ea0e035eb1.pdf>

6/1/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$62.07
7/2/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$21.52

## EXHIBIT C

Ad Details



**Speaker Sara Gideon**

Sponsored • Paid for by Gideon Leadership PAC

Learn more about Maine's Speaker of the House and the current news from our Capitol.



**Speaker Sara Gideon**

Government Official

5,195 people like this

Like Page

About the disclaimer

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. [Learn more](#)

Information from the advertiser

About the Page



**Speaker Sara Gideon**

[View more ads from this Page](#)

Total spent by Page on ads about social issues, elections or politics

May 2018 - Aug 4, 2019  
United States

**\$3,373**

[See spend details](#)

Data About This Ad

Inactive

Started running on Jul 16, 2018

50K - 100K

Impressions

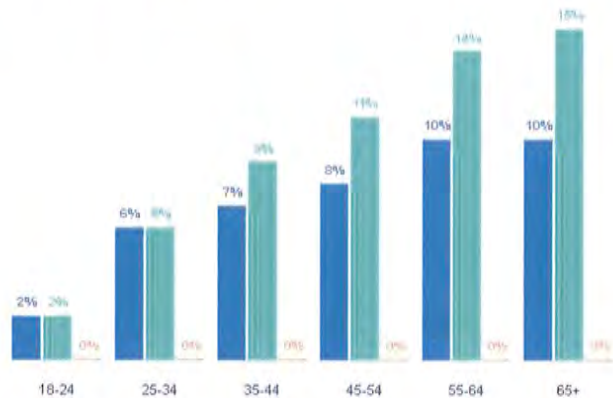
\$1K - \$5K

Money spent (USD)

Who Was Shown This Ad

Age and Gender

Men Women Unknown



Where This Ad Was Shown



Ad Details



**Speaker Sara Gideon**

Sponsored • Paid for by Gideon Leadership PAC

Want to learn more about what I've been working on? Sign up for our email list at [www.speakergideon.com](http://www.speakergideon.com)



**About the disclaimer**

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. [Learn more](#)

**Information from the advertiser**

Disclaimer  
Gideon Leadership PAC

**About the Page**



**Speaker Sara Gideon**

[View more ads from this Page](#)

**Total spent by Page on ads about social issues, elections or politics**

May 2018 - Aug 4, 2019  
United States

**\$3,373**  
[See spend details](#)

**Recently spent by Page on ads about social issues, elections or politics**

7 days • Jul 29 - Aug 4, 2019

**Data About This Ad**

● Inactive  
Aug 7, 2018 - Aug 14, 2018

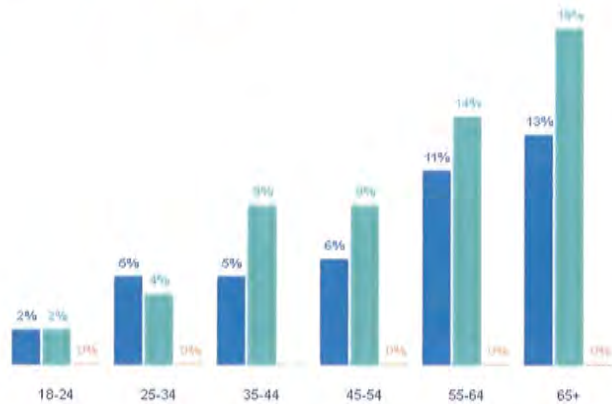
1K - 5K  
Impressions

<\$100  
Money spent (USD)

**Who Was Shown This Ad**

**Age and Gender**

Men Women Unknown



**Where This Ad Was Shown**



### Ad Details



**Speaker Sara Gideon**

Sponsored • Paid for by Gideon Leadership PAC

Want to stay updated on the latest news from the Speaker's Office? Sign up for our list by visiting [www.speakergideon.com](http://www.speakergideon.com)



Speaker Sara Gideon

Sign Up

#### About the disclaimer

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. [Learn more](#)

#### Information from the advertiser

Disclaimer  
Gideon Leadership PAC

#### About the Page



**Speaker Sara Gideon**

#### Data About This Ad

Inactive  
Sep 7, 2018 - Sep 14, 2018

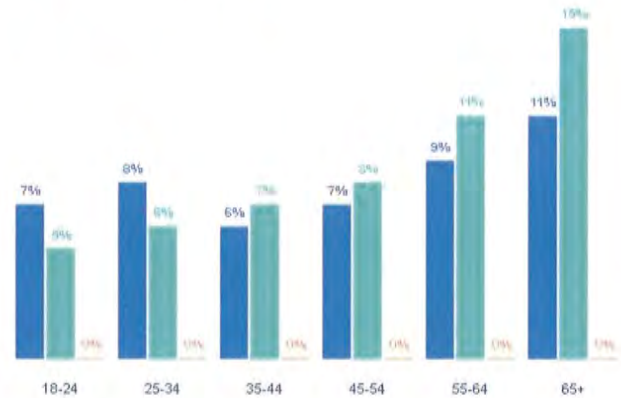
1K - 5K  
Impressions

<\$100  
Money spent (USD)

#### Who Was Shown This Ad

Age and Gender

Men Women Unknown



#### Where This Ad Was Shown





### Ad Details



**Speaker Sara Gideon**

Sponsored • Paid for by Gideon Leadership PAC

Serving as the Speaker of the House is both the most rewarding and the most challenging job I've ever held. Every single day I'm inspired by and so proud serve alongside my colleagues, the [Maine House Democrats](#). Watch and share this video to see why:

#### Data About This Ad

**Inactive**  
Oct 18, 2018 - Oct 27, 2018

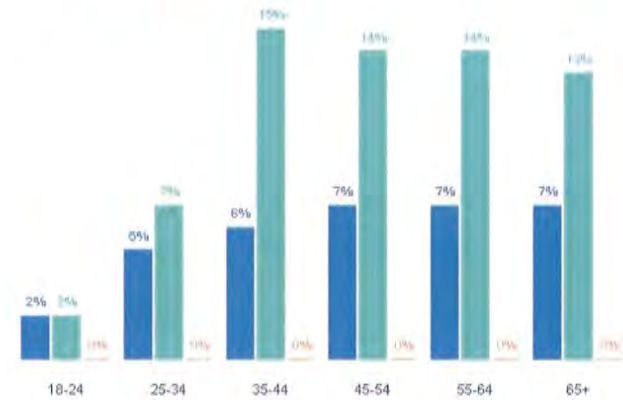
**10K - 50K**  
Impressions

**\$100 - \$499**  
Money spent (USD)

#### Who Was Shown This Ad

##### Age and Gender

**Men** **Women** **Unknown**



#### Speaker Sara Gideon

Government Official

5,195 people like this

Like Page

#### About the disclaimer

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. [Learn more](#)

#### Information from the advertiser

Disclaimer  
Gideon Leadership PAC

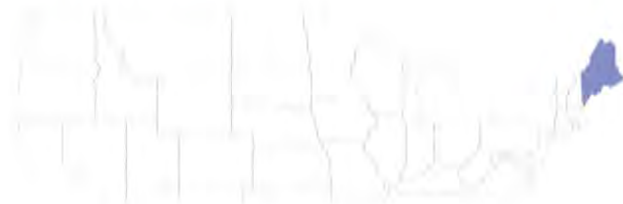
#### About the Page



**Speaker Sara Gideon**

[View more ads from this Page](#)

#### Where This Ad Was Shown



Ad Details



**Speaker Sara Gideon**

Sponsored • Paid for by Gideon Leadership PAC

Both this morning and at the end of today, here's what I'm thinking and what I'll continue to carry forward in my heart. I believe in the goodness of people. I believe in our resilience, our ability to learn and adapt and to keep moving forward, even after we've sometimes taken steps back first. I believe that no matter how we vote or what letter we put after our name, that we do it with conviction and a desire to make ourselves and our world better each day. I believe in us and I'm never giving that belief up. ...



Speaker Sara Gideon

Sign Up

About the disclaimer

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. [Learn more](#)

Information from the advertiser

Disclaimer  
Gideon Leadership PAC

About the Page

Data About This Ad

Inactive  
Nov 6, 2018 - Nov 7, 2018

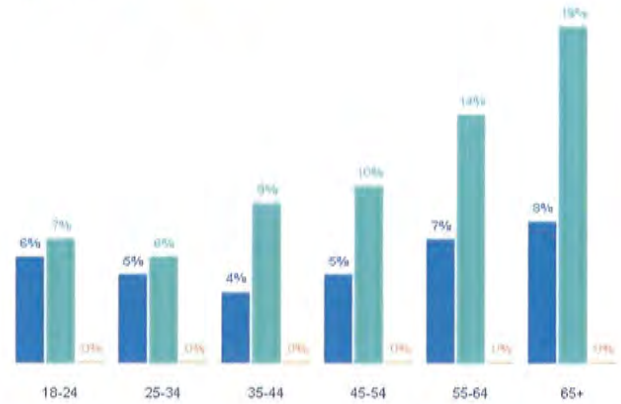
1K - 5K  
Impressions

<\$100  
Money spent (USD)

Who Was Shown This Ad

Age and Gender

Men Women Unknown



Where This Ad Was Shown



### Ad Details



**Speaker Sara Gideon**

Sponsored • Paid for by Gideon Leadership PAC

One year ago, the US Senate passed a disastrous bill that that has had negative impacts across the board and Maine's senator cast the lynchpin vote. I couldn't let this day go by without reminding Mainers of what has happened since then. Read more in the [The Bangor Daily News](#):



**Mainers deserve a senator who will stand up for them**

In reality, Collins' vote on the tax bill was a "very serious breach" of a promise — to us.

[Learn More](#)

BANGORDAILYNEWS.COM

#### About the disclaimer

When an advertiser categorizes their ad as being about social issues, elections or politics, they are required to disclose who paid for the ad. [Learn more](#)

#### Information from the advertiser

#### About the Page



**Speaker Sara Gideon**

#### Data About This Ad

● Inactive

Dec 19, 2018 - Dec 29, 2018

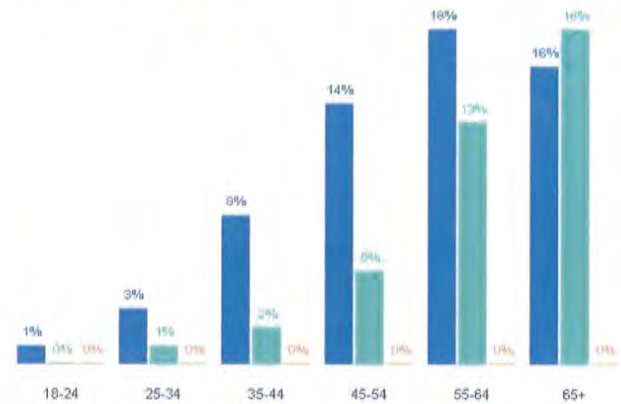
10K - 50K  
Impressions

\$100 - \$499  
Money spent (USD)

#### Who Was Shown This Ad

##### Age and Gender

Men Women Unknown



#### Where This Ad Was Shown







Commission on Governmental Ethics and Election Practices  
 Mail: 135 State House Station, Augusta, Maine 04333  
Office: 45 Memorial Circle, Augusta, Maine  
 Website: [www.maine.gov/ethics](http://www.maine.gov/ethics)  
 Phone: 207-287-4179  
 Fax: 207-287-6775

## 2018 CAMPAIGN FINANCE REPORT

### FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 South Freeport Road Freeport, ME, 04032 PHONE:(207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		SEAN SMITH 18 KELLOGG ST, APT 1 PORTLAND, ME, 04101 PHONE:(207) 590-0759 EMAIL: SEANCHRISTOPHERSMITH@GMAIL.COM	
REPORT	DUE DATE	REPORTING PERIOD	
42-DAY POST-PRIMARY REPORT	07/24/2018	05/30/2018 - 07/17/2018	

#### FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$150.00	\$20,000.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$150.00	\$20,000.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$5,656.58	\$9,919.94
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$5,656.58	\$9,919.94
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$76,347.95	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$150.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$5,656.58	
12. CASH BALANCE AT END OF PERIOD	\$70,841.37	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

I, GIDEON LEADERSHIP PAC, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: GIDEON LEADERSHIP PAC  
 REPORT FILED ON: 7/24/2018 7:30:55 PM  
 LAST MODIFIED:  
 COMMITTEE ID: 4851

**SCHEDULE A  
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

1 = Individual

2 = Candidate/ Spouse/ Domestic Partner

3 = Commercial Source

4 = Nonprofit Organization

5 = Political Action Committee

6 = Political Party Committee

7 = Ballot Question Committee

8 = Other Candidate/ Candidate Committee

9 = Candidate / Candidate Committee

10 = General Treasury Transfer

11 = Transfer from Previous Campaign

12 = Contributors giving \$50 or less

13 = Contributors giving \$100 or less

14 = Contributors giving \$200 or less

15 = MCEA Payment

16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
6/17/2018	ROBERT SANTOMENNA 8 HARRASEEKET ROAD SOUTH FREEPORT, ME, 04078	NA Retired Contribution	1	\$150.00
<b>TOTAL CASH CONTRIBUTIONS</b>				\$150.00

**SCHEDULE B-1  
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
6/1/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$62.07
6/2/2018	MAINE HOSTING SOLUTIONS 122 FRONT STREET BATH, ME, 04530	Web Hosting	WEB	\$2.95
6/7/2018	AMERICAN AIRLINES 4333 AMON CARTER BLVD FORT WORTH, TX, 76155	Travel	TRV	\$495.16
6/11/2018	Ann E. Peoples 22 Garfield St Westbrook, ME, 04092	Contribution	CON	\$400.00
6/11/2018	Charlotte M. Warren 19 OAKWOOD DR HALLOWELL, ME, 04347	Contribution	CON	\$400.00
6/11/2018	John M Nutting 334 Campbell Rd Leeds, ME, 04263	Contribution	CON	\$800.00
6/11/2018	Genevieve McDonald 129 N Main St Stonington, ME, 04681	Contribution	CON	\$400.00
6/11/2018	Heidi Eileen Brooks 1 Pleasant Street, Apt. #2 Lewiston, ME, 04240	Contribution	CON	\$400.00
6/11/2018	Margaret M. O'Neil 21 Sheila Circle Saco, ME, 04072	Contribution	CON	\$400.00
6/11/2018	Stanley Byron Short, Jr. PO BOX 103 PITTSFIELD, ME, 04967	Contribution	CON	\$400.00
6/17/2018	ACT BLUE PO BOX 441146 SOMERVILLE, MA, 02144	Bank Fees	OTH	\$5.94
6/21/2018	CUSHNOC BREWING COMPANY 243 WATER STREET AUGUSTA, ME, 04330	Food	FOD	\$187.12



6/22/2018	PANERA 37 XAVIER LOOP AUGUSTA, ME, 04330	Food	FOD	\$29.87
6/26/2018	SARA GIDEON 37 SOUTH FREEPORT ROAD FREEPORT, ME, 04032	Travel Reimbursement	TRV	\$1,000.00
7/2/2018	VERIZON 2 Somerset Street Portland, ME, 04101	Cell Phone	EQP	\$163.18
7/2/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$21.52
7/5/2018	AUGUSTA-WATERVILLE FLORIST 118 Mount Vernon Avenue Augusta, ME, 04330	Flowers	OTH	\$94.90
7/5/2018	MAINE HOSTING SOLUTIONS 122 FRONT STREET BATH, ME, 04530	Web Hosting	WEB	\$1.40
7/11/2018	AUGUSTA-WATERVILLE FLORIST 118 Mount Vernon Avenue Augusta, ME, 04330	Flowers	OTH	\$100.17
7/11/2018	Pizza and Burger 4441 Collins Avenue Miami Beach, FL, 33140	Food	FOD	\$48.26
7/12/2018	Miami Taxi Cab <a href="http://www.mysurerride.com/">http://www.mysurerride.com/</a> Miami, FL, 33101	Travel	TRV	\$42.00
7/13/2018	Logan Airport 1 HARBORSIDE DRIVE BOSTON, MA, 02128	Travel	TRV	\$105.00
7/13/2018	Fontainebleau Miami Beach 441 Collins Avenue Miami Beach, FL, 33140	Travel	TRV	\$72.28
7/16/2018	AMERICAN AIRLINES 4333 AMON CARTER BLVD FORT WORTH, TX, 76155	Travel	TRV	\$24.76
<b>TOTAL OPERATING EXPENDITURES</b>				<b>\$5,656.58</b>



Commission on Governmental Ethics and Election Practices  
 Mail: 135 State House Station, Augusta, Maine 04333  
Office: 45 Memorial Circle, Augusta, Maine  
 Website: [www.maine.gov/ethics](http://www.maine.gov/ethics)  
 Phone: 207-287-4179  
 Fax: 207-287-6775

**2018 CAMPAIGN FINANCE REPORT**  
**FOR POLITICAL ACTION COMMITTEES**

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 South Freeport Road Freeport, ME, 04032 PHONE:(207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		SEAN SMITH 18 KELLOGG ST, APT 1 PORTLAND, ME, 04101 PHONE:(207) 590-0759 EMAIL: SEANCHRISTOPHERSMITH@GMAIL.COM	
REPORT	DUE DATE	REPORTING PERIOD	
OCTOBER QUARTERLY REPORT	10/05/2018	07/18/2018 - 09/30/2018	

**FINANCIAL ACTIVITY SUMMARY**

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$21,984.00	\$41,984.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$21,984.00	\$41,984.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$52,676.38	\$62,596.32
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$52,676.38	\$62,596.32
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$70,841.37	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$21,984.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$52,676.38	
12. CASH BALANCE AT END OF PERIOD	\$40,148.99	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

I, GIDEON LEADERSHIP PAC, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: GIDEON LEADERSHIP PAC  
 REPORT FILED ON: 10/5/2018 6:13:00 PM  
 LAST MODIFIED:  
 COMMITTEE ID: 4851



**SCHEDULE A  
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- |  |  |
|--|--|
| 1 = Individual                           | 9 = Candidate / Candidate Committee    |
| 2 = Candidate/ Spouse/ Domestic Partner  | 10 = General Treasury Transfer         |
| 3 = Commercial Source                    | 11 = Transfer from Previous Campaign   |
| 4 = Nonprofit Organization               | 12 = Contributors giving \$50 or less  |
| 5 = Political Action Committee           | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee            | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee            | 15 = MCEA Payment                      |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution             |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
9/21/2018	AMERICAN INSURANCE ASSOCIATION 2101 L STREET, NW SUITE 400 WASHINGTON, DC, 20037		3	\$250.00
9/21/2018	CHURCHILL DOWNS 600 NORTH HURSTBOURNE PARKWAY, STE. 400 LOUISVILLE, KY, 40222		3	\$3,000.00
9/21/2018	EXPRESS SCRIPTS, INC. One Express Way St. Louis, MO, 63121		3	\$500.00
9/21/2018	MILLERCOORS PO BOX 482 MILWAUKEE, WI, 53201-0482		3	\$500.00
9/21/2018	NORTHEAST PATIENTS GROUP 685 Congress Street Portland, ME, 04102		3	\$1,000.00
9/21/2018	Patrick Hunt P.O. Box 130 Island Falls, ME, 04747	Self Attorney/Legal Contribution	1	\$334.00
9/21/2018	ROBERT SANTOMENNA 8 HARRASEEKET ROAD SOUTH FREEPORT, ME, 04078	NA Retired	1	\$50.00
9/21/2018	SYNGENTA SYNGENTA CROP PROTECTION LLC GREENSBORO, NC, 27409		3	\$500.00
9/28/2018	AMERICAN CHEMISTRY COUNCIL 700 SECOND STREET NE WASHINGTON, DC, 20002		3	\$200.00
9/28/2018	CHARTER COMMUNICATIONS 12405 POWERSCOURT DR ST LOUIS, MO, 63131-3674		3	\$2,000.00

9/28/2018	CLEAN POWER PAC PO Box 743 Augusta, ME, 04332-0743		5	\$1,000.00
9/28/2018	COALITION TO LOWER MAINE TAXES 125 Community Drive, Suite 101 Augusta, ME, 04330		5	\$250.00
9/28/2018	Collings Leadership Fund PO Box 1213 Portland, ME, 04104		5	\$250.00
9/28/2018	H.A. MAPES INC 152 PLEASANT ST SPRINGVALE, ME, 04083		3	\$250.00
9/28/2018	MAINE AFFORDABLE HOUSING COALITION 307 Cumberland Ave Portland, ME, 04101		3	\$200.00
9/28/2018	MAINE BANKERS ASSOCIATION PAC 489 Congress ST Portland, ME, 04101		5	\$2,500.00
9/28/2018	MAINE CONSERVATION VOTERS ACTION FUND 295 Water Street, Suite 9 Augusta, ME, 04330		5	\$250.00
9/28/2018	MAINE CREDIT UNION LEAGUE P.O. Box 1236 Portland, ME, 04104		3	\$2,500.00
9/28/2018	MAINE DENTAL PAC P.O. Box 215 Manchester, ME, 04351		5	\$750.00
9/28/2018	MAINE HEALTH CARE ASSOCIATION 317 State Street Augusta, ME, 04330		5	\$500.00
9/28/2018	MAINE REAL ESTATE & DEVELOPMENT ASSOCIATION 2 MARKET STREET SUITE 5B PORTLAND, ME, 04101		3	\$500.00
9/28/2018	OCEAN PROPERTIES 1000 Market Street, PORTSMOUTH, NH, 03801		3	\$250.00
9/28/2018	PIERCE ATWOOD 77 Winthrop St Augusta, ME, 04330		3	\$1,000.00
9/28/2018	SUMMIT NATURAL GAS OF MAINE, INC. 7810 SHAFFER PKWY., SUITE 120 P.O. BOX 270868 LITTLETON, CO, 80127-0868		3	\$1,000.00
9/28/2018	Wilby Public Affairs 89 Spring Street Brunswick, ME, 04401		3	\$250.00
9/30/2018	ABBOTT LABORATORIES 100 Abbott Park Rd Abbott Park, IL, 60064-6001		3	\$1,000.00

9/30/2018	EATON PEABODY 80 EXCHANGE STREET PO BOX 1210 BANGOR, ME, 04402-1210		3	\$200.00
9/30/2018	JOHNSON AND JOHNSON PAC 1350 I Street NW, Suite 1210 WASHINGTON, DC, 20005		5	\$500.00
9/30/2018	ME TRUCK PAC PO BOX 857 AUGUSTA, ME, 04330		5	\$500.00
<b>TOTAL CASH CONTRIBUTIONS</b>				<b>\$21,984.00</b>



**SCHEDULE B-1  
OPERATING EXPENDITURES**

<b>EXPENDITURE TYPES</b>	
<p>CNS Campaign consultants</p> <p>EQP Equipment (office machines, furniture, cell phones, etc.)</p> <p>FOD Food for campaign events, volunteers</p> <p>MHS Mail house (all services purchased)</p> <p>OTH Other (bank fees, entrance fees, small tools, wood, etc.)</p> <p>POL Polling and survey research</p> <p>PRO Other professional services</p> <p>RAD Radio ads, production costs</p> <p>TRV Travel (fuel, mileage, lodging, etc.)</p> <p>WEB Online advertising, website design, maintenance, hosting, etc.</p>	<p>CON Contribution to other candidate, party, committee</p> <p>FND Fundraising events</p> <p>LIT Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)</p> <p>OFF Office supplies, phone and internet services, rent and utilities</p> <p>PHO Phone banks, automated telephone calls</p> <p>POS Postage for U.S. Mail and mail box fees</p> <p>PRT Print media ads only (newspapers, magazines, etc.)</p> <p>SAL Campaign workers' salaries and personnel costs</p> <p>TVN TV or cable ads, production costs</p>

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
7/18/2018	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. Box 2021 Augusta, ME, 04338	Contribution	CON	\$50,000.00
7/23/2018	STAPLES 240 ROUTE 1 FALMOUTH, ME, 04105	Office Supplies	OFF	\$1.86
7/30/2018	VERIZON 2 Somerset Street Portland, ME, 04101	Phone	OFF	\$263.74
8/6/2018	Days Crabmeat and Lobster 1269 U.S. Route 1 Yarmouth, ME, 04096	Fundraiser	FND	\$195.14
8/6/2018	Petrillo's 15 Depot Street Freeport, ME, 04032	Fundraiser	FND	\$65.78
8/7/2018	L.L. Bean 95 Main Street Freeport, ME, 04032	Fundraiser	FND	\$99.01
8/16/2018	VERIZON 2 Somerset Street Portland, ME, 04101	Phone	OFF	\$163.18
8/27/2018	AUGUSTA-WATERVILLE FLORIST 118 Mount Vernon Avenue Augusta, ME, 04330	Flowers	OTH	\$84.35
8/31/2018	Red Barn 455 RIVERSIDE DRIVE AUGUSTA, ME, 04330	Food	FOD	\$79.23
9/5/2018	AUGUSTA-WATERVILLE FLORIST 118 Mount Vernon Avenue Augusta, ME, 04330	Flowers	OTH	\$84.35
9/18/2018	STAPLES 14 CROSSING WAY AUGUSTA, ME, 04330	Office Supplies	OFF	\$59.07
9/18/2018	Tiffany Danielle Roberts-Lovell 35 Buttonwood Rd South Berwick, ME, 03908	Contribution	CON	\$400.00
9/20/2018	VERIZON 2 Somerset Street Portland, ME, 04101	Phone	OFF	\$371.30
9/21/2018	ACT BLUE PO BOX 441146 SOMERVILLE, MA, 02144	Bank Fee	OTH	\$1.98
9/24/2018	Apple 364 MAINE MALL ROAD SOUTH PORTLAND, ME, 04106	Office Supplies	OFF	\$527.39
9/28/2018	Maine Women's Lobby 295 WATER STREET AUGUSTA, ME, 04330	Contribution	CON	\$280.00
<b>TOTAL OPERATING EXPENDITURES</b>				\$52,676.38



Commission on Governmental Ethics and Election Practices  
 Mail: 135 State House Station, Augusta, Maine 04333  
Office: 45 Memorial Circle, Augusta, Maine  
 Website: [www.maine.gov/ethics](http://www.maine.gov/ethics)  
 Phone: 207-287-4179  
 Fax: 207-287-6775

**2018 CAMPAIGN FINANCE REPORT**  
**FOR POLITICAL ACTION COMMITTEES**

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 South Freeport Road Freeport, ME, 04032 PHONE:(207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		SEAN SMITH 18 KELLOGG ST, APT 1 PORTLAND, ME, 04101 PHONE:(207) 590-0759 EMAIL: SEANCHRISTOPHERSMITH@GMAIL.COM	
REPORT	DUE DATE	REPORTING PERIOD	
11-DAY PRE-GENERAL REPORT	10/26/2018	10/01/2018 - 10/23/2018	

**FINANCIAL ACTIVITY SUMMARY**

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$16,360.00	\$58,344.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$16,360.00	\$58,344.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$13,720.38	\$13,720.38
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$2,074.24	\$64,670.56
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$15,794.62	\$78,390.94
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$40,148.99	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$16,360.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$15,794.62	
12. CASH BALANCE AT END OF PERIOD	\$40,714.37	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

I, SEAN SMITH, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: SEAN SMITH  
 REPORT FILED ON: 10/26/2018 6:15:45 PM  
 LAST MODIFIED:  
 COMMITTEE ID: 4851



**SCHEDULE A  
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- |  |  |
|--|--|
| 1 = Individual                           | 9 = Candidate / Candidate Committee    |
| 2 = Candidate/ Spouse/ Domestic Partner  | 10 = General Treasury Transfer         |
| 3 = Commercial Source                    | 11 = Transfer from Previous Campaign   |
| 4 = Nonprofit Organization               | 12 = Contributors giving \$50 or less  |
| 5 = Political Action Committee           | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee            | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee            | 15 = MCEA Payment                      |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution             |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
10/16/2018	AMERICAN WIND ENERGY ASSOCIATION 1501 M STREET 10TH FLOOR WASHINGTON, DC, 20005		3	\$1,000.00
10/16/2018	BERNSTEIN SHUR 100 Middle Street Portland , ME, 04104		3	\$1,000.00
10/16/2018	CGI TECHNOLOGIES AND SOLUTIONS PAC 11325 RANDOM HILLS RD FAIRFAX, VA, 22030		5	\$500.00
10/16/2018	CIANBRO 101 CIANBRO SQUARE P.O. BOX 1000 PITTSFIELD, ME, 04967-1000		3	\$500.00
10/16/2018	CIGNA CIGNA, PNC BANK N.A. PHILIDELPHIA, PA, 33111		3	\$500.00
10/16/2018	Contributors giving \$50 or less		12	\$60.00
10/16/2018	David Howes 287 CHURCH ROAD BRUNSWICK, ME, 04011	EMPLOYMENT INFO REQUESTEDContribution	1	\$250.00
10/16/2018	DRUMMOND WOODSUM 84 MARGINAL WAY SUITE 600 PORTLAND, ME, 04101-2480		3	\$2,000.00
10/16/2018	Friends of Maine Hospitals 33 Fuller Road Augusta, ME, 04330		3	\$1,000.00
10/16/2018	Hollywood Casino 500 MAIN STREET BANGOR, ME, 04401		3	\$500.00

10/16/2018	Industrial Energy Consumer Group P.O. 5117 Augusta, ME, 04330		3	\$500.00
10/16/2018	LogistiCare Solutions 1275 Peachtree Street, NE Atlanta, GA, 30309		3	\$250.00
10/16/2018	MAINE ASSOCIATION OF REALTORS PAC  19 COMMUNITY DRIVE AUGUSTA, ME, 04330		5	\$3,000.00
10/16/2018	MALORY SHAUGHNESSY 295 WATER STREET SUITE 307 AUGUSTA, ME, 04330	ALLIANCE FOR ADDICTION AND MENTAL HEALTH SERVICES EXECUTIVE DIRECTOR Contribution	1	\$300.00
10/16/2018	National Association of Insurance Advisors 85 CHURCH STREET BELFAST, ME, 04915		3	\$200.00
10/16/2018	PHRMA 950 F STREET NW SUITE 300 WASHINGTON, DC, 20004		3	\$2,000.00
10/16/2018	RETAIL LUMBER DEALERS ASSOCIATION OF MAINE PAC 585 North Greenbush Road Rensselaer, NY, 12144		5	\$750.00
10/16/2018	STEVEN CHARLES LEVY 16 COLUMBIA AVENUE BRUNSWICK, ME, 04011	MAINE PHILANTHROPY CENTER Consultant Contribution	1	\$100.00
10/16/2018	Thomas Abello 121 DODGE ROAD EDGECOMB, ME, 04556	EMPLOYMENT INFO REQUESTED Contribution	1	\$100.00
10/16/2018	Timothy Shannon 47 WEST ELM STREET YARMOUTH, ME, 04096	Verrill Dana Attorney/Legal Contribution	1	\$250.00
10/16/2018	VERRILL DANA LLP ONE PORTLAND SQUARE PORTLAND, ME, 04112		3	\$1,000.00
10/23/2018	MAINE EYE PAC 30 Association Drive Manchester, ME, 04351		5	\$100.00
10/23/2018	VISA PO BOX 203730 AUSTIN, TX, 78720		3	\$500.00
<b>TOTAL CASH CONTRIBUTIONS</b>				<b>\$16,360.00</b>

**SCHEDULE B  
EXPENDITURES TO SUPPORT OR OPPOSE**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/14/2018	Convergence Targeted Communications 1221 Connecticut Avenue, NW Washington, DC, 20036	Mail  PAYMENT OF \$3,426.10 TO SUPPORT: Anne B Gass Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.  PAYMENT OF \$3,428.34 TO SUPPORT: Walter N Riseman Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.  PAYMENT OF \$3,429.98 TO SUPPORT: William D. Pluecker Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.  PAYMENT OF \$3,435.96 TO SUPPORT: Jeffrey Evangelos Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.	MHS	\$13,720.38
<b>TOTAL EXPENDITURES TO SUPPORT OR OPPOSE:</b>				<b>\$13,720.38</b>



**SCHEDULE B-1  
OPERATING EXPENDITURES**

<b>EXPENDITURE TYPES</b>				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
<b>DATE OF EXPENDITURE</b>	<b>PAYEE</b>	<b>REMARK</b>	<b>TYPE</b>	<b>AMOUNT</b>
10/1/2018	Chellie Pingree P.O. Box 17613 Portland, ME, 04112	Contribution	CON	\$1,000.00
10/1/2018	Roland Daniel Martin 424 Shore Rd. P.O. Box 97 Sinclair, ME, 04779	Contribution	CON	\$400.00
10/7/2018	Frederick Austin 11 Grove St Newport, ME, 04953	Contribution	CON	\$400.00
10/11/2018	VERIZON 2 Somerset Street Portland, ME, 04101	Cell Phone	EQP	\$193.05
10/12/2018	Sunoco 253 U.S. route 1 Yarmouth, ME, 04096	Travel	TRV	\$53.12
10/16/2018	ACT BLUE PO BOX 441146 SOMERVILLE, MA, 02144	Bank Fee	OTH	\$28.07
<b>TOTAL OPERATING EXPENDITURES</b>				<b>\$2,074.24</b>



Commission on Governmental Ethics and Election Practices  
 Mail: 135 State House Station, Augusta, Maine 04333  
Office: 45 Memorial Circle, Augusta, Maine  
 Website: [www.maine.gov/ethics](http://www.maine.gov/ethics)  
 Phone: 207-287-4179  
 Fax: 207-287-6775

**2018 CAMPAIGN FINANCE REPORT**  
**FOR POLITICAL ACTION COMMITTEES**

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 South Freeport Road Freeport, ME, 04032 PHONE:(207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		SEAN SMITH 18 KELLOGG ST, APT 1 PORTLAND, ME, 04101 PHONE:(207) 590-0759 EMAIL: SEANCHRISTOPHERSMITH@GMAIL.COM	
REPORT	DUE DATE	REPORTING PERIOD	
42-Day Post-General Report	12/18/2018	10/24/2018 - 12/11/2018	

**FINANCIAL ACTIVITY SUMMARY**

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$19,199.04	\$77,543.04
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$19,199.04	\$77,543.04
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$9,032.19	\$22,752.57
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$11,528.21	\$76,198.77
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$20,560.40	\$98,951.34
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$40,714.37	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$19,199.04	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$20,560.40	
12. CASH BALANCE AT END OF PERIOD	\$39,353.01	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

I, SEAN SMITH, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: SEAN SMITH  
 REPORT FILED ON: 12/18/2018 3:14:21 PM  
 LAST MODIFIED:  
 COMMITTEE ID: 4851



**SCHEDULE A  
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

- |  |  |
|--|--|
| 1 = Individual                           | 9 = Candidate / Candidate Committee    |
| 2 = Candidate/ Spouse/ Domestic Partner  | 10 = General Treasury Transfer         |
| 3 = Commercial Source                    | 11 = Transfer from Previous Campaign   |
| 4 = Nonprofit Organization               | 12 = Contributors giving \$50 or less  |
| 5 = Political Action Committee           | 13 = Contributors giving \$100 or less |
| 6 = Political Party Committee            | 14 = Contributors giving \$200 or less |
| 7 = Ballot Question Committee            | 15 = MCEA Payment                      |
| 8 = Other Candidate/ Candidate Committee | 16 = Financial Institution             |

DATE RECEIVED	CONTRIBUTOR	EMPLOYER AND OCCUPATION	TYPE	AMOUNT
10/25/2018	Ann Mitchell 21 PROSPECT ST WATERVILLE, ME, 04901	EMPLOYMENT INFO REQUESTED Contribution	1	\$250.00
10/25/2018	COMCAST FINANCIAL AGENCY CORPORATION 1701 JFK Boulevard Philadelphia, PA, 19103-2838		3	\$500.00
10/25/2018	PROPERTY CASUALTY INSURERS ASSOCIATION OF AMERICA 8700 WEST BRYN MAWR AVE SUITE 1200S CHICAGO, IL, 60631-3512		3	\$250.00
10/25/2018	Sazerac Company, Inc. 3850 N. Causeway Blvd Suite 1695 Metairie, LA, 70002		3	\$3,000.00
10/30/2018	ELI LILLY AND COMPANY PAC MAIL DROP CODE 1852 INDIANAPOLIS, IN, 46285		3	\$250.00
10/30/2018	EMERA PO Box 932 Bangor, ME, 04402		3	\$500.00
10/30/2018	Jacob Mitchell PO BOX 146 KENTS HILL, ME, 04349	Mitchell Tardy Jackson Lobbyist Contribution	1	\$150.00
10/30/2018	MAINE BREWERS' GUILD PO Box 2817 S. PORTLAND, ME, 04116		5	\$500.00
10/30/2018	MERCK SHARP & DOHME CORP. ONE MERCK DRIVE WHITEHOUSE STATION, NJ, 08889-3400		3	\$1,000.00
10/30/2018	Term Limits America PAC 9900 Main Street Suite 303 Fairfax, VA, 22031		5	\$500.00

10/30/2018	Thomas Bull 27 South St Freeport, ME, 04032	EMPLOYMENT INFO REQUESTEDContribution	1	\$100.00
10/30/2018	VERIZON PO BOX 21075 TULSA, OK, 74121		3	\$750.00
11/1/2018	Enbridge, Inc. 1100 Louisiana St, Suite 3300 Houston, TX, 77002		3	\$1,000.00
11/1/2018	Everytown for Gun Safety PO BOX 4184 NEW YORK, NY, 10163		5	\$1,000.00
11/1/2018	Professional Logging Contractors of Maine PO BOX 1036 AUGUSTA, ME, 04332		3	\$687.50
11/1/2018	SPECTRUM MEDICAL GROUP 324 GANNETT DRIVE SUITE 200 SO. PORTLAND, ME, 04106		3	\$1,000.00
11/5/2018	ANTHEM BLUE CROSS BLUE SHIELD PO BOX 68086 CINCINNATI, OH, 45206		3	\$1,000.00
11/5/2018	AT&T JPMORGAN CHASE BANK, N.A. SYRACUSE, NY, 12303		3	\$750.00
12/3/2018	American Express 200 VESEY STREET NEW YORK, NY, 10285		3	\$1,000.00
12/3/2018	AT&T JPMORGAN CHASE BANK, N.A. SYRACUSE, NY, 12303		3	\$350.00
12/3/2018	MAINE ENERGY MARKETERS ASSOCIATION 25 GREENWOOD ROAD PO BOX 249 FREEPORT, ME, 04011		3	\$500.00
12/3/2018	Pavement Coatings Technology Council 2901 Ohio Blvd Terre Haute, IN, 47803		3	\$1,000.00
12/4/2018	Convergence Targeted Communications 1221 Connecticut Ave NW Washington, DC, 20036		3	\$2,911.54
12/4/2018	James Chisholm 19 Charles Street Charlestown, MA, 02129	EMPLOYMENT INFO REQUESTEDContribution	1	\$250.00
<b>TOTAL CASH CONTRIBUTIONS</b>				<b>\$19,199.04</b>

**SCHEDULE B  
EXPENDITURES TO SUPPORT OR OPPOSE**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/26/2018	Convergence Targeted Communications 1221 Connecticut Avenue, NW Washington, DC, 20036	Facebook  PAYMENT OF \$1,000.00 TO SUPPORT: Jeffrey Evangelos Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.  PAYMENT OF \$1,000.00 TO SUPPORT: Walter N Riseman Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.  PAYMENT OF \$500.00 TO SUPPORT: Anne B Gass Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.  PAYMENT OF \$500.00 TO SUPPORT: William D. Pluecker Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.	WEB	\$3,000.00



10/28/2018	Convergence Targeted Communications 1221 Connecticut Avenue, NW Washington, DC, 20036	Mail  PAYMENT OF \$1,506.05 TO SUPPORT: Anne B Gass Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.  PAYMENT OF \$1,507.17 TO SUPPORT: Walter N Riseman Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.  PAYMENT OF \$1,507.99 TO SUPPORT: William D. Pluecker Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.  PAYMENT OF \$1,510.98 TO SUPPORT: Jeffrey Evangelos Jurisdiction: State. Party: UNENROLLED. Office: REPRESENTATIVE. ELECTION YEAR: 2018.	MHS	\$6,032.19
<b>TOTAL EXPENDITURES TO SUPPORT OR OPPOSE:</b>				<b>\$9,032.19</b>

**SCHEDULE B-1  
OPERATING EXPENDITURES**

<b>EXPENDITURE TYPES</b>			
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs
WEB	Online advertising, website design, maintenance, hosting, etc.		

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/24/2018	AMERICAN AIRLINES 4333 AMON CARTER BLVD FORT WORTH, TX, 76155	Travel	TRV	\$264.76
10/29/2018	Democratic Legislative Campaign Committee 1225 Eye Street NW Suite 1250 Washington, DC, 20005	Contribution	CON	\$10,000.00
11/2/2018	KENNEBEC SAVINGS BANK 150 STATE STREET AUGUSTA, ME, 04330	Bank Fee	OTH	\$22.00
11/5/2018	AUGUSTA-WATERVILLE FLORIST 118 Mount Vernon Avenue Augusta, ME, 04330	Flowers	OTH	\$69.58
11/7/2018	AUGUSTA-WATERVILLE FLORIST 118 Mount Vernon Avenue Augusta, ME, 04330	Flowers	OTH	\$100.17
11/8/2018	Domino's Pizza 28 WESTERN AVENUE AUGUSTA, ME, 04330	Food	FOD	\$204.23
11/13/2018	JetBlue 1001 WESTBROOK STREET PORTLAND, ME, 04102	Travel	TRV	\$272.75
11/14/2018	VERIZON 2 Somerset Street Portland, ME, 04101	Cell Phone	OFF	\$153.30
11/21/2018	SWEET CHILLI THAI RESTAURANT 75 AIRPORT ROAD AUGUSTA, ME, 04330	Food	FOD	\$114.97
11/29/2018	AUGUSTA-WATERVILLE FLORIST 118 Mount Vernon Avenue Augusta, ME, 04330	Flowers	OTH	\$171.75
11/30/2018	Applebee's 136 Western Avenue Augusta, ME, 04330	Food	FOD	\$28.50
11/30/2018	ACT BLUE PO BOX 441146 SOMERVILLE, MA, 02144	Bank Fee	OTH	\$3.95
12/3/2018	AMERICAN AIRLINES 4333 AMON CARTER BLVD FORT WORTH, TX, 76155	Travel	TRV	\$122.25
<b>TOTAL OPERATING EXPENDITURES</b>				<b>\$11,528.21</b>



Commission on Governmental Ethics and Election Practices  
 Mail: 135 State House Station, Augusta, Maine 04333  
Office: 45 Memorial Circle, Augusta, Maine  
 Website: www.maine.gov/ethics  
 Phone: 207-287-4179  
 Fax: 207-287-6775

**2019 CAMPAIGN FINANCE REPORT**  
**FOR POLITICAL ACTION COMMITTEES**

COMMITTEE		TREASURER	
GIDEON LEADERSHIP PAC 37 South Freeport Road Freeport, ME, 04032 PHONE:(207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		SEAN SMITH 18 KELLOGG ST, APT 1 PORTLAND, ME, 04101 PHONE:(207) 590-0759 EMAIL: SEANCHRISTOPHERSMITH@GMAIL.COM	
REPORT	DUE DATE	REPORTING PERIOD	
JANUARY QUARTERLY REPORT	01/15/2019	12/12/2018 - 12/31/2018	

**FINANCIAL ACTIVITY SUMMARY**

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$0.00	\$77,543.04
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$0.00	\$77,543.04
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$22,752.57
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$833.70	\$77,032.47
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$833.70	\$99,785.04
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$39,353.01	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$0.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$833.70	
12. CASH BALANCE AT END OF PERIOD	\$38,519.31	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

I, SEAN SMITH, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: SEAN SMITH  
 REPORT FILED ON: 1/15/2019 5:29:06 PM  
 LAST MODIFIED:  
 COMMITTEE ID: 4851



**SCHEDULE B-1  
OPERATING EXPENDITURES**

<b>EXPENDITURE TYPES</b>				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
<b>DATE OF EXPENDITURE</b>	<b>PAYEE</b>	<b>REMARK</b>	<b>TYPE</b>	<b>AMOUNT</b>
12/12/2018	VERIZON 2 Somerset Street Portland, ME, 04101	Cell Phone	OFF	\$153.30
12/14/2018	Figgy's Catering 722 Congress Street Portland, ME, 04102	Food	FOD	\$680.40
<b>TOTAL OPERATING EXPENDITURES</b>				<b>\$833.70</b>

## EXHIBIT D



Commission on Governmental Ethics and Election Practices  
 Mail: 135 State House Station, Augusta, Maine 04333  
Office: 45 Memorial Circle, Augusta, Maine  
 Website: www.maine.gov/ethics  
 Phone: 207-287-4179  
 Fax: 207-287-6775

**2019 CAMPAIGN FINANCE REPORT**  
**FOR POLITICAL ACTION COMMITTEES**

COMMITTEE		TREASURER
GIDEON LEADERSHIP PAC 37 South Freeport Road Freeport, ME, 04032 PHONE:(207) 865-9593 EMAIL: SARAIGIDEON@GMAIL.COM		SEAN SMITH P.O. Box 53 Bangor, ME, 04402 PHONE:(207) 590-0759 EMAIL: SEANCHRISTOPHERSMITH@GMAIL.COM
REPORT	DUE DATE	REPORTING PERIOD
July Quarterly Report	07/15/2019	04/01/2019 - 06/30/2019

**FINANCIAL ACTIVITY SUMMARY**

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$0.00	\$9,260.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$0.00	\$9,260.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$42,344.59	\$47,779.31
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$42,344.59	\$47,779.31
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$42,344.59	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$0.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$42,344.59	
12. CASH BALANCE AT END OF PERIOD	\$0.00	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

I, SEAN SMITH, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: PAUL LAVIN on behalf of SEAN SMITH  
 REPORT FILED ON: 6/20/2019 4:19:56 PM  
 LAST MODIFIED: 6/20/2019 4:42:22 PM  
 COMMITTEE ID: 4851

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
4/2/2019	AUGUSTA-WATERVILLE FLORIST 118 Mount Vernon Avenue Augusta, ME, 04330	Flowers	OTH	\$229.83
4/3/2019	AUGUSTA-WATERVILLE FLORIST 118 Mount Vernon Avenue Augusta, ME, 04330	Flowers	OTH	\$64.30
4/11/2019	VERIZON 2 Somerset Street Portland, ME, 04101	Cell Phone	OFF	\$153.31
4/19/2019	AUGUSTA-WATERVILLE FLORIST 118 Mount Vernon Avenue Augusta, ME, 04330	Flowers	OTH	\$79.07
4/22/2019	HANNAFORD 295 Forest Avenue Portland, ME, 04101	Food	FOD	\$11.03
5/13/2019	VERIZON 2 Somerset Street Portland, ME, 04101	Cell Phone	OFF	\$322.05
6/3/2019	Riverfront Barbeque & Grille 300 WATER STREET AUGUSTA, ME, 04330	Food	FOD	\$46.64
6/3/2019	Red Curry 179 Mt. Vernon Ave. Augusta, ME, 04330	Food	FOD	\$228.17
6/4/2019	THE QUARRY TAP ROOM 122 WATER STREET HALLOWELL, ME, 04347	Food	FOD	\$87.94
6/10/2019	SWEET CHILLI THAI RESTAURANT 75 AIRPORT ROAD AUGUSTA, ME, 04330	Food	FOD	\$116.28
6/12/2019	VERIZON 2 Somerset Street Portland, ME, 04101	Cell Phone	OTH	\$153.28
6/14/2019	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. Box 2021 Augusta, ME, 04338	Contribution	CON	\$37,329.89
6/14/2019	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE P.O. Box 2021 Augusta, ME, 04338	Contribution	CON	\$250.00
6/20/2019	. . ., ME, 00000	Commission Staff adjustment	OTH	\$3,272.80
<b>TOTAL OPERATING EXPENDITURES</b>				<b>\$42,344.59</b>





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

January 31, 2020

Sean Smith, Treasurer  
Gideon Leadership PAC  
P.O. Box 53  
Bangor, ME 04402

Sent via USPS and Email

Re: Request to Investigate the Gideon Leadership PAC and Sara Gideon's 2018 Campaign Committee

Dear Mr. Smith:

As you are aware, the Maine Commission on Governmental Ethics and Election Practices (the "Commission") received the enclosed request for investigation from Dr. Demi Kouzounas. She alleges that:

- The Gideon Leadership PAC (the "Committee" or "PAC") did not include in its 2018 campaign finance reports expenditures by the PAC for Facebook advertising which totaled thousands of dollars; and
- That because these ads promoted Speaker Sara Gideon, the PAC's expenditures constitute contributions to her 2018 re-election campaign.

This letter is to provide the PAC and Speaker Gideon with an opportunity to respond to the request for investigation and to provide any factual information or legal argument that you believe is relevant to whether the Commission should conduct an investigation into this matter.

### **Commission's Decision Whether to Investigate**

The Commission will consider whether to conduct an investigation or any further action on this matter at its next public meeting. The meeting will take place on Tuesday, March 10, 2020, at the Commission's office, 45 Memorial Circle, in Augusta. The meeting will begin at 9:00 a.m. The Commission staff recommends that you attend the meeting to respond to the request for investigation and to answer any questions from the Commissioners.

## **Relevant Law**

*Standard for Initiating an Investigation.* The Commission is required to review every request to investigate an alleged violation of campaign finance law and to conduct an “investigation if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred.” (21-A M.R.S. § 1003(2)).

*Definitions of Contribution and Expenditure.* The term contribution includes “[a] gift, subscription, loan, advance or deposit of money or anything of value made for the purpose of influencing the nomination or election of any person to state, county or municipal office ...” (21-A M.R.S. § 1012(2)(A)(1)). Influence means “to promote, support, oppose or defeat.” (21-A M.R.S. § 1012(4-A)).

An expenditure made in cooperation or consultation with a candidate, or at the request or suggestion of a candidate, is considered to be a contribution to that candidate. (21-A M.R.S. § 1015(5)). An expenditure is defined as a payment made for the purpose of initiating or influencing a campaign. (21-A M.R.S. § 1012(3)(A)(1)).

*Content of Reports – Itemized expenditures.* PACs are required to disclose all of their expenditures in regularly scheduled campaign finance reports. (21-A M.R.S. §§ 1060(4), (7)).

*Limits on Contributions to Candidates.* A political committee, political action committee, other committee, firm, partnership, corporation, association or organization may not make contributions to a candidate in support of the candidacy of one person aggregating more than \$400 per election for a legislative candidate. (21-A M.R.S. § 1014(2)).

## **Request for Response**

Please submit a written response to the request for investigation by Friday, February 14, 2020. You are welcome to submit any factual information or legal argument you believe would be relevant to the Commission’s decision whether to investigate. The Commission staff suggests that your response address the following points:

- Please provide the details of the payments to Facebook referenced in the request to investigate, including date, payor, and amount for each payment.

Sean Smith, Treasurer

Page 3

January 31, 2020

- Did the PAC pay for production costs for any of the six Facebook ads referenced? If so, how much was paid, to whom, and when were the payments made?
- If the Committee did not pay for the production and/or distribution of these ads how were these costs paid for?
- What was the purpose of these ads? Did they promote Speaker Gideon's re-election?
- Should these ads be considered as contributions to Speaker Gideon's 2018 legislative campaign? If these ads were to be considered as contribution, what is the Committee's position as to whether these ads exceeded the contribution limits of \$400?

Thank you for your cooperation with this request. The Commission staff looks forward to receiving your response on or before February 14, 2020. Please let me know if you have any questions.

Sincerely,



Michael J. Dunn, Esq.

Political Committee and Lobbyist Registrar

Enclosures

Cc: Speaker Sara Gideon (w/encl.)  
Dr. Demi Kouzounas (wo/encl.)



February 20, 2020

Sent via USPS and Email

Benjamin Grant, Esq.  
McTeague Higbee  
4 Union Park P.O. Box 5000  
Topsham, ME 04086

Demi Kouzounos  
361 Seaside Avenue  
Saco, ME 04072

Re: Request to Investigate the Gideon Leadership PAC and Sara Gideon's 2018 Campaign Committee

Dear Parties:

This letter serves to inform you that the Commission will hear the above captioned matter on April 29, 2020, at 10:00 A.M. The meeting will be held at 45 Memorial Circle, second floor, Augusta, ME 04333.

This letter also serves to invite Mr. Grant to respond to the pending Request for Investigation. Please provide written submissions no later than March 20, 2020.

Please let me know if either of you have any questions or concerns.

Sincerely,

*Michael J. Dunn*

Michael J. Dunn, Esq.  
Political Committee and Lobbyist Registrar





# McTEAGUE HIGBEE

LAWYERS. ALLIES. ADVOCATES.

Benjamin K. Grant, Esq.

March 23, 2020

## BY FIRST CLASS MAIL AND EMAIL

Michael J. Dunn Esq.  
Political Committee and Lobbyist Registrar  
Maine Commission on Governmental Ethics & Election Practices  
135 State House Station  
Augusta, ME 04333-0135

**Re: Amended Response to Kouzounas Request for Investigation**

Dear Mr. Dunn:

We write as counsel to Speaker Sara Gideon, Speaker Gideon's 2018 state legislative campaign committee (the "Campaign"), and Gideon Leadership PAC (the "Leadership PAC") (collectively, "Respondents"), in response to the complaint and request for investigation filed by Dr. Demi Kouzounas, chair of the Maine Republican Party, on January 28, 2020 (the "Complaint").

Dr. Kouzounas alleges in her complaint that the Leadership PAC failed to disclose expenditures for certain Facebook advertisements in its 2018 Maine Commission on Governmental Ethics & Election Practices (the "Commission") campaign finance reports. She further alleges that such expenditures constituted excessive in-kind contributions to Speaker Gideon's 2018 campaign for re-election to the Maine House of Representatives. Both allegations are baseless.

First, the payments for the advertisements at issue in the Complaint were reported in the campaign finance reports of the entity that made them, the House Democratic Campaign Committee ("HDCC"). Second, these advertisements were not contributions to Speaker Gideon's campaign because they were created and posted by the Speaker's Office in connection with Speaker Gideon's official duties as Speaker of the Maine House of Representatives and were not "made for the purpose of influencing the nomination or election of any person to state, county or municipal office."<sup>1</sup>

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<sup>1</sup> Me. Rev. Stat. tit. 21-A, § 1012(3)(A)(1).



Because the evidence presented in this response demonstrates that no violation of Maine law has occurred, the Commission should deny Dr. Kouzounas's request for an investigation and dismiss her complaint.

## FACTUAL BACKGROUND

Sara Gideon was first elected to the Maine House of Representatives in 2012.<sup>2</sup> In 2016, she was elected to serve as the Speaker of the House.<sup>3</sup> In 2018, Speaker Gideon ran for re-election in State House District 48. Speaker Gideon earned 72 percent of the vote in the general election, easily securing her re-election.<sup>4</sup>

During the 2018 election cycle, Speaker Gideon also served as the principal officer for the Leadership PAC and HDCC.<sup>5</sup> Because Maine political action committee funds may be used for "expenses incurred in the proper performance of the duties of the Legislator,"<sup>6</sup> funds from both committees were used to pay for certain expenses related to Speaker Gideon's official duties, as well as those of Speaker Gideon's House colleagues.

One type of official expense paid for by both the Leadership PAC and HDCC were low-dollar Facebook advertisements produced by the Speaker's official staff and posted through the Facebook account "Speaker Sara Gideon," which was used to promote the Maine State Legislature, the Speaker's Office, and Speaker Gideon in her capacity as Speaker. The "Speaker Sara Gideon" Facebook account and the advertisements run through it were also used to raise awareness about goings-on in Augusta, advertise legislator townhalls across the state, and recruit Mainers to "Stay current on Maine's topics" by signing up for the official email list of the Speaker's Office through Speaker Gideon's official website, [www.speakergideon.com](http://www.speakergideon.com).<sup>7</sup> This official website, which many of the ads linked to, was used to aggregate Speaker Gideon's and other officials' press releases and official statements and compile information on important

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<sup>2</sup> See Me. Dep't. Sec'y of State, Tabulation for Elections held in 2012, General Election - November 6, 2012, Representative to the Legislature, <https://www.maine.gov/sos/cec/elec/results/2012-13/results12-13.html>.

<sup>3</sup> See Me. State Legislature, Speakers of the Maine House of Representatives (Dec. 8, 2016), <https://legislature.maine.gov/lawlibrary/speakers-of-the-maine-house-of-representatives-1820/9256/>.

<sup>4</sup> See Me. Dep't. Sec'y of State, Tabulation for Elections held in 2018, November 6, 2018 - General Election - Non-ranked-choice offices, State Representative, <https://www.maine.gov/sos/cec/elec/results/results18.html#nonrcv>.

<sup>5</sup> Gideon Leadership PAC, 2018 Registration: Political Action Committee (amended May 22, 2018); House Democratic Campaign Committee, 2018 Registration: Political Action Committee (amended May 23, 2018).

<sup>6</sup> See Me. Rev. Stat. tit. 21-A, §1054-B (2017) (emphasis added) ("If a Legislator is a principal officer or treasurer of a political action committee or is one of the individuals primarily responsible for raising contributions or making decisions for the political action committee, the committee . . . may reimburse the Legislator for expenses incurred in the proper performance of the duties of the Legislator, for purchases made on behalf of the committee and for travel expenses associated with volunteering for the committee."); see also Office of Att'y Gen. Janet Mills, Legislative Ethics: 129th Legislature at 6-7 (Dec. 4, 2018) (issued pursuant to Me. Rev. Stat. tit. 1, § 1008(3) (Ethics Seminar)), <https://legislature.maine.gov/doc/2591> ("The PAC may reimburse you for expenses you incur in the proper performance of your duties as a legislator, travel expenses related to volunteering for the PAC, and purchases made on behalf of the PAC. However, reimbursements for expenses determined by the Commission to be for the purpose of personal financial enrichment are not allowable.").

<sup>7</sup> Way Back Machine, [speakergideon.com](https://web.archive.org/web/20180805081540/https://speakergideon.com/) (Aug. 5, 2018), <https://web.archive.org/web/20180805081540/https://speakergideon.com/>.

policy topics such as the budget, the economy, education, health care, seniors, and women's issues.

As demonstrated by the Facebook invoices submitted as Exhibit A to this response, initially the Facebook advertisements placed through the Speaker Sara Gideon Facebook account were purchased by an employee of the Speaker's Office using the Leadership PAC's credit card.<sup>8</sup> Although these advertisements were not placed for the purpose of influencing any elections in Maine, and therefore did not include Maine's required political advertising disclaimer, they automatically included the default disclaimer associated with the Facebook account, "Paid for by Gideon Leadership PAC."

At some point in July 2018, the Leadership PAC's credit card appears to have stopped working for Facebook's payment processing system.<sup>9</sup> At that point it appears that because the Facebook system was unable to charge the Leadership PAC's credit card for the Speaker Sara Gideon Facebook account's monthly advertising expenses, the Facebook system then tried to charge other credit cards already loaded into the account. Facebook landed on HDCC's Mastercard, which processed the charge. Thereafter, Facebook charged HDCC's credit card each month for ads run through the Speaker Sara Gideon Facebook account. The account's default disclaimer was not updated when the account switched to charging HDCC's Mastercard for these advertisements.

HDCC paid for and reported disbursements for eight ads that included the Leadership PAC's default Facebook disclaimer. These ads are described below in further detail.

#### Advertisement #1<sup>10</sup>

This ad contained the following copy: "Speaker Sara Gideon believes that Maine people are our best resource, that our students deserve our investment and that fostering innovation and entrepreneurship will lead to successful businesses statewide. Join us to learn more about her work in Augusta and across Maine." It contained a simple graphic that reads "Sara Gideon" and it linked to the [www.speakingideon.com](http://www.speakingideon.com) website.

This ad began running statewide in Maine on June 27, 2018 and ran until April 2019.<sup>11</sup> HDCC timely reported its payment for these advertisements in its 2018 October Quarterly Report, 2018

<sup>8</sup> See generally Exhibit A (Leadership PAC Facebook invoices).

<sup>9</sup> Exhibit A, Facebook Invoices, MasterCard\***A**: Ref. No. BAE38GJGW2 (July 31, 2018) (indicating failed charge).

<sup>10</sup> Referred to as "Website Promotion 2" in invoices. Facebook ID: 1303325743136730, <https://www.facebook.com/ads/library/?id=1303325743136730>.

<sup>11</sup> Exhibit A, Facebook Invoices, MasterCard\***A**: Ref. No. HK2XYFSGW2 (June 30, 2018) (\$8.19). Exhibit B (HDCC Facebook Invoices), Facebook Invoices, MasterCard\***B**: Ref. No. 7ZGFUGAHW2 (July 31, 2018) (\$157.84); Ref. No. JYGFUGAHW2 (July 31, 2018) (\$2.33) (Instagram) (not available in Facebook Ad Library); Ref. No. JVMCVGSGW2 (Aug. 31, 2018) (\$23.13); Ref. No. 8D5A4H6HW2 (Aug. 25, 2018) (\$126.89); Ref. No. WXVWSH2HW2 (Sept. 30, 2018) (\$154.96); Ref. No. 72VHAKNGW2 (Oct. 31, 2018) (\$150.03); Ref. No. T9UKKJ2HW2 (Nov. 30, 2018) (\$154.96); Ref. No. 6XQ8BJWGW2 (Dec. 31, 2018) (\$150.01); Ref. No. 5EQNFLNGW2 (Jan. 31, 2019) (\$155.01); Ref. No. BYXY8K6GW2 (Feb. 28, 2019) (\$144.87); Ref. No. JXGDQK6HW2 (Mar. 31, 2019) (\$150.02); Ref. No. 6L3YKSGW2 (Apr. 30, 2019) (\$56.36).

11 Day Pre-General Report, 2018 42 Day Post-General Report, 2019 April Quarterly Report, and 2019 July Quarterly Report.<sup>12</sup> The Leadership PAC timely reported its payment for the ad's first several days, before its credit card stopped working, in its 2018 42 Day Post-Primary Report.<sup>13</sup>

#### Advertisement # 2<sup>14</sup>

This ad contained the following copy: "Learn more about Maine's Speaker of the House and the current news from our Capitol." It contained a photograph of the Maine House Democratic caucus and linked to the Speaker Sara Gideon Facebook page.

The ad began running statewide in Maine in July 2018 and ran until June 2019.<sup>15</sup> HDCC timely reported its payments for this advertisement in its 2018 October Quarterly Report, 2018 11 Day Pre-General Report, 2018 42 Day Post-General Report, 2019 April Quarterly Report, 2019 July Quarterly Report, and 2019 October Quarterly Report.<sup>16</sup>

#### Advertisement #3<sup>17</sup>

This ad contained the following copy: "Serving as the Speaker of the House is both the most rewarding and the most challenging job I've ever held. Every single day I'm inspired by and so proud serve alongside my colleagues, the Maine House Democrats. Watch and share this video to see why[.]" It contained an embedded video and did not link to any other webpage.

The embedded video featured Speaker Gideon and other members of the Maine House Democratic caucus discussing their pride in being members of the legislature and representing their communities. The video discusses the benefits of Maine's citizen legislature and the importance of fighting for the people it serves. The video features footage and photographs of dozens of Democratic legislators and is partially narrated by Speaker Gideon.

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<sup>12</sup> HDCC, 2018 October Quarterly Report at 19, 20, 21; HDCC, 2018 11 Day Pre-General Report at 14; HDCC, 2018 42 Day Post-General at 19, 22; HDCC, 2019 April Quarterly Report at 4, 5, 6; HDCC, 2019 July Quarterly Report at 3, 4.

<sup>13</sup> Gideon Leadership PAC, 2018 42 Day Post-Primary Report at 4.

<sup>14</sup> Referred to as "[07/16/2018] Promoting Speaker Sara Gideon" in invoices. Facebook ID: 291402161613783, <https://www.facebook.com/ads/library/?id=291402161613783>.

<sup>15</sup> Exhibit B, Facebook Invoices, MasterCard\*B Ref. No. 7ZGFUGAHW2 (July 31, 2018) (\$43.56); Ref. No. JVMCVGSGW2 (Aug. 31, 2018) (\$13.90); Ref. No. 8D5A4H6HW2 (Aug. 25, 2018) (\$75.99); Ref. No. WXVWSH2HW2 (Sept. 30, 2018) (\$93.00); Ref. No. 72VHAKNGW2 (Oct. 31, 2018) (\$90.16); Ref. No. T9UKKJ2HW2 (Nov. 30, 2018) (\$92.96); Ref. No. 6XQ8BJWGW2 (Dec. 31, 2018) (\$89.88); Ref. No. 5EQNFLNGW2 (Jan. 31, 2019) (\$93.19); Ref. No. BYXY8K6GW2 (Feb. 28, 2019) (\$86.92); Ref. No. JXGDQK6HW2 (Mar. 31, 2019) (\$89.97); Ref. No. 6L3YKSGW2 (Apr. 30, 2019) (\$89.83); Ref. No. 5YTXQLAHW2 (May 31, 2019) (\$96.11); Ref. No. VBNNJNNGW2 (June 30, 2019) (\$58.33).

<sup>16</sup> HDCC, 2018 October Quarterly Report at 19, 20, 21; HDCC, 2018 11 Day Pre-General Report at 14; HDCC, 2018 42 Day Post-General at 19, 22; HDCC, 2019 April Quarterly Report at 4, 5, 6; HDCC, 2019 July Quarterly Report at 3, 4, 5; HDCC, 2019 October Quarterly Report at 8.

<sup>17</sup> Referred to as "Post: 'Serving as the Speaker of the House is both the...'" / "HDO Video Second Run" in invoices. Facebook ID: 225797631410691, <https://www.facebook.com/ads/library/?id=225797631410691>; Facebook ID: 2174407065966714, <https://www.facebook.com/ads/library/?id=2174407065966714>.

HDCC paid Portland film producer Alex Coppola \$5,500 to produce this video, which was made for an internal party event, the Maine Democratic Party's 2018 summer convention.<sup>18</sup> While this video was made to be shown at the convention, rather than to be used for advertising disseminated to the general public, Speaker's Office staff chose to recycle it for use as a statewide official-side ad on two occasions: between July 30, 2018 and August 13, 2018, and between October 18, 2018 and October 27, 2018.<sup>19</sup> HDCC reported its payment for these advertisements in its 2018 October Quarterly Report and 2018 42 Day Post-General Report.<sup>20</sup>

#### Advertisement # 4<sup>21</sup>

This ad contained the following copy: "Want to learn more about what I've been working on? Sign up for our email list at [www.speakerideon.com](http://www.speakerideon.com)." It contained a simple graphic that read: "Sara Gideon, Speaker of the Maine House of Representatives, [www.speakerideon.com](http://www.speakerideon.com)."

This ad ran statewide in Maine from August 7 to August 14, 2018.<sup>22</sup> HDCC timely reported its payment for these advertisements in its 2018 October Quarterly Report.<sup>23</sup>

#### Advertisement #5<sup>24</sup>

This ad contained the following copy: "Want to stay updated on the latest news from the Speaker's Office? Sign up for our list by visiting [www.speakerideon.com](http://www.speakerideon.com)." It linked to the [www.speakerideon.com](http://www.speakerideon.com) website and contained a simple graphic that read: "Sara Gideon, Speaker of the Maine House of Representatives, [www.speakerideon.com](http://www.speakerideon.com)."

This ad ran statewide in Maine from September 7 to September 14, 2018.<sup>25</sup> HDCC timely reported its payment for these advertisements in its 11 Day Pre-General Report.<sup>26</sup>

#### Advertisement #6<sup>27</sup>

This ad contained the following copy: "Both this morning and at the end of today, here's what I'm thinking and what I'll continue to carry forward in my heart. I believe in the goodness of people. I believe in our resilience, our ability to learn and adapt and to keep moving forward, even after we've sometimes taken steps back first. I believe that no matter how we vote or what

<sup>18</sup> See HDCC, 2018 October Quarterly Report at 23.

<sup>19</sup> Exhibit B, Facebook Invoices, MasterCard [REDACTED]: Ref No. 7ZGFUGAHW2 (July 31, 2018) (\$16.79); Ref. No. 8D5A4H6HW2 (Aug. 25, 2018) (\$283.21); Ref. No. 72VHAKNGW2 (Oct. 31, 2018) (\$200.00).

<sup>20</sup> HDCC, 2018 October Quarterly Report at 19, 20; HDCC, 2018 42 Day Post-General at 19.

<sup>21</sup> Referred to as "Post: 'Want to learn more about what I've been working...'" in invoices. Facebook ID: 199708970898006, <https://www.facebook.com/ads/library/?id=199708970898006>.

<sup>22</sup> Exhibit B, Facebook Invoices, MasterCard [REDACTED]: Ref. No. 8D5A4H6HW2 (Aug. 25, 2018) (\$13.91).

<sup>23</sup> HDCC, 2018 October Quarterly Report at 20.

<sup>24</sup> Referred to as "Post: 'Want to stay updated on the latest news from the...'" in invoices. Facebook ID: 1968371636518316, <https://www.facebook.com/ads/library/?id=1968371636518316>.

<sup>25</sup> Exhibit B, Facebook Invoices, MasterCard [REDACTED]: Ref. No. WXVWSH2HW2 (Sept. 30, 2018) (\$50.00).

<sup>26</sup> HDCC, 2018 11 Day Pre-General Report at 14.

<sup>27</sup> Referred to as "Post: 'Both this morning and at the end of today, here's...'" in invoices. Facebook ID: 305215070312685, <https://www.facebook.com/ads/library/?id=305215070312685>.



letter we put after our name, that we do it with conviction and a desire to make ourselves and our world better each day. I believe in us and I'm never giving that belief up. So go ahead - exercise your right and privilege in our beautiful democracy today and then make a conscious decision to keep your heart open to those around you. Our future depends on it. Our kids demand it." The ad contained a photograph of Speaker Gideon's three children and linked to the [www.speakergideon.com](http://www.speakergideon.com) website.

This ad ran statewide in Maine on November 6 and November 7, 2018.<sup>28</sup> HDCC timely reported its payment for these advertisements in its 42 Day Post-General Report.<sup>29</sup>

**Advertisement #7<sup>30</sup>**

This ad contained the following copy: "Last night's results mean we can truly get to work improving the lives of Maine people. Democrats not only strengthened the House majority, we increased it by 16 seats. I'm also incredibly proud to announce we've elected 48 democratic women – 54% of of [sic] the new Democratic caucus – to fill these seats. Our candidates worked incredibly hard to run positive and dynamic grassroots campaigns to connect with Maine voters. These extraordinary women and men are ready to work and I'm eager to serve alongside with them. Read the latest on Maine House results here:

<https://speakergideon.com/2018/11/07/democrats-strengthen-control-of-state-house-of-representatives-increase-majority/>." It contained a photograph of the Maine House Democratic caucus and linked to the [www.speakergideon.com](http://www.speakergideon.com) website.

The ad ran statewide in Maine from November 7 to November 14, 2018.<sup>31</sup> HDCC timely reported its payment for these advertisements in its 42 Day Post-General Report.<sup>32</sup>

**Advertisement #8<sup>33</sup>**

This ad contained the following copy: "One year ago, the US Senate passed a disastrous bill that that has had negative impacts across the board and Maine's senator cast the lynchpin vote. I couldn't let this day go by without reminding Mainers of what has happened since then. Read more in [ ] The Bangor Daily News[.]" It contained a photograph of U.S. Senator Susan Collins and linked to an article Speaker Gideon had written for The Bangor Daily News.

The ad ran statewide in Maine from December 19 to December 29, 2018.<sup>34</sup> HDCC timely reported its payment for these advertisements in its 2019 April Quarterly Report.<sup>35</sup>

<sup>28</sup> Exhibit B, Facebook Invoices, MasterCard<sup>B</sup> Ref. No. T9UKKJ2HW2 (Nov. 30, 2018) (\$50.00).

<sup>29</sup> HDCC, 2018 42 Day Post-General at 22.

<sup>30</sup> Referred to as "Post: 'Last night's results mean we can truly get to...'" in invoices. Facebook ID: 264966790762890, <https://www.facebook.com/ads/library/?id=264966790762890>.

<sup>31</sup> Exhibit B, Facebook Invoices, MasterCard<sup>B</sup>; Ref. No. T9UKKJ2HW2 (Nov. 30, 2018) (\$50.00).

<sup>32</sup> HDCC, 2018 42 Day Post-General at 22.

<sup>33</sup> Referred to as "Post: 'One year ago, the US Senate passed a disastrous...'" in invoices. Facebook ID: 327029554550009, <https://www.facebook.com/ads/library/?id=327029554550009>.

<sup>34</sup> Exhibit B, Facebook Invoices, MasterCard<sup>B</sup>; Ref. No. 6XQ8BJWGW2 (Dec. 31, 2018) (\$200.00).

<sup>35</sup> HDCC, 2019 April Quarterly Report at 4.

## LEGAL ARGUMENT

### 1. The Facebook payments were not contributions to Speaker Gideon's campaign

As clearly demonstrated by their content and timing, each Facebook ad listed above was placed to support Speaker Gideon's official work in the Maine House of Representatives and was not made for the purpose of influencing an election or campaign. As such, none of the payments for the ads were contributions to Speaker Gideon's campaign.

Maine law provides that "[a]ny *expenditure* made by any person in cooperation, consultation or concert with, or at the request or suggestion of, a candidate, a candidate's political committee or their agents is considered to be a contribution to that candidate."<sup>36</sup> "Expenditure" is defined to include "[a] purchase, payment, distribution, loan, advance, deposit or gift of money or anything of value *made for the purpose of influencing the nomination or election of any person to state, county or municipal office.*"<sup>37</sup> An "expenditure" explicitly does not include "[a]ny communication by any person that is not made for the purpose of influencing the nomination for election, or election, of any person to state, county or municipal office."<sup>38</sup> "Influence" means "promote, support, oppose or defeat."<sup>39</sup>

None of the ads fall within the definition of an expenditure because none of the ads were made for the purpose of influencing an election. These ads were all official in nature and did not contain any indicia of a political advertisement. The messaging of each ad related to the official work of Speaker Gideon and the Maine legislature. The ads exclusively referred to Speaker Gideon as Speaker of the House and never as a candidate facing re-election. No ad contained a link to a campaign webpage and the only sign-up ask in any of the ads prompted the viewer to sign up for Speaker Gideon's official email list, not a campaign list. Finally, the ads were not targeted toward Speaker Gideon's district, and any ad placed before the November 2018 election did not mention an election or campaign.

The official nature of these advertisements is apparent from their content. For example, ad #1 simply lists three beliefs of Speaker Gideon's and then asks the reader to "join us to learn more about her work in Augusta and across Maine" by viewing her official website. The reference to Speaker Gideon's work in Augusta, the location of the Maine House of Representatives, and the link to her official website clearly demonstrate the officially-related purpose of the ad. Ads #4 and #5 also simply invite viewers to learn more about what Speaker Gideon has been working on and what is going on in the Speaker's Office by viewing her official website. Ad #2 similarly invites viewers to learn more about Speaker Gideon and get updates from the Capitol by

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<sup>36</sup> Me. Rev. Stat. tit. 21-A, § 1015(5) (emphasis added).

<sup>37</sup> *Id.* § 1012(3)(A)(1) (emphasis added); *see also id.* § 1052(4)(A)(1) (defining a political action committee expenditure as "[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").

<sup>38</sup> *Id.* § 1012(3)(B)(6) (emphasis added); *see also id.* § 1052(4)(B)(6) (excluding from the definition of a political action committee expenditure "[a]ny communication by any political action committee member that is not made for the purpose of influencing the nomination or election of any person to state or county office").

<sup>39</sup> *Id.* § 1012(4-A).

following her official Facebook page. None of these advertisements reference voting or an election, but instead invite Mainers to stay up-to-date on the workings of their government.

Ad #6 does reference voting and elections, but it is clear from its content and timing that it was not distributed for the purpose of influencing an election. Instead, the ad contains a general and explicitly non-partisan statement on the importance of voting and respecting differences in political opinions. Distributed both on election day and the day after, the ad did not advocate for a particular election outcome or support one political party over the other, but rather explicitly urged that “no matter how we vote or what letter we put after our name, that we do it with conviction and a desire to make ourselves and our world better each day.” Because this ad preached tolerance no matter what political party or candidate the viewer supported in the 2018 election and continued to run the day after the election, it could not have been made for the purpose of influencing the election.

The content of ad #3 also clearly indicates that it was not made for the purpose of influencing Speaker Gideon’s election, but rather to promote the official work of the caucus. The ad’s four-minute video component never mentions the upcoming 2018 elections or voting. Instead, the video contains some photographs and video of Speaker Gideon, as well as voice-over narration, and then mainly features other lawmakers and their commitment and approach to serving their constituents as legislators. Only 15 seconds of the four-minute video, approximately six percent of the advertisement, refers to Speaker Gideon’s experience in the Maine legislature individually. Additionally, the majority of segments of the video during which Speaker Gideon provides narration features photographs of other lawmakers, and a full minute-and-a-half of the video features interviews with lawmakers that Speaker Gideon does not narrate and in which the lawmakers do not mention Speaker Gideon. The clear purpose of the video is to promote the entire caucus in its official capacity, as opposed to Speaker Gideon in her capacity as a candidate.

In addition to the officially-related content contained in each of these ads, the timing of many of these ads clearly indicates that they were not made for the purpose of influencing an election. For example, ads #1 and #2, which were by far the most expensive of the ads at issue, ran continuously from late June or July 2018—i.e. after Speaker Gideon’s 2018 primary election—until the spring of 2019, many months after the 2018 general election had passed. If these ads were made for the purpose of influencing an election, rather than simply promoting Speaker Gideon’s official website and Facebook page, they would have been taken down in November 2018. Similarly, ads #7 and #8 began running after the 2018 election. As such, they could not possibly have been made to influence the outcome of the 2018 election.

Finally, other details surrounding these ads indicate that they were not run to assist Speaker Gideon with her re-election campaign. For example, these ads were created and distributed by staff in the Speaker’s Office and the House Democratic Office, individuals responsible for issuing official-side communications and maintaining Speaker Gideon’s official website. Further, as explained in more detail below, none of these ads contained Maine’s required disclaimer for political advertising made for the purpose of influencing an election, indicating

that the individuals who created and posted the ads did not consider them to be ads distributed for the purpose of influencing an election.<sup>40</sup>

These ads were all run statewide and were not targeted at Speaker Gideon’s electoral district (House District 48), which means that these ads were purposefully distributed to voters who could not vote for Speaker Gideon. Additionally, at the time these ads were run, Speaker Gideon already had a track record of wide electoral margins, and therefore did not need in-kind Facebook ads in order to earn re-election. For example, in the 2016 election, in which Speaker Gideon faced the same Republican opponent as she did in 2018, she had won by 36 percentage points, and in 2018, she ultimately won by 46. Indeed, Speaker Gideon’s 2018 campaign was in so little need of financial assistance and was so capable of paying its own way that on October 25, 2018, the Campaign contributed \$1,600 to HDCC.<sup>41</sup> Simply put, there was no reason that Speaker Gideon’s re-election campaign would have needed or wanted an in-kind contribution from HDCC.

**2. The Facebook payments were all properly reported by the payor**

Payments for every one of the advertisements highlighted in Dr. Kouzounas’s complaint were timely and accurately reported to the Commission in HDCC’s campaign finance reports. Each expenditure was reported as follows:

Date of Expenditure	Where reported	Payee/Remark/Type	Amount	Corresponding Invoice
8/1/18	Oct. 2018 Report, p. 19	Facebook/Web	\$220.52	Ref. No. 7ZGFUGAHW2 (July 31, 2018); Ref. No. JYGFUGAHW2 (July 31, 2018) (Instagram Invoice)
8/27/18	Oct. 2018 Report, p. 20	Facebook/Web	\$500	Ref. No. 8D5A4H6HW2 (Aug. 25, 2018)
9/4/18	Oct. 2018 Report, p. 21	Facebook/Web	\$37.03	Ref. No. JVMCVGS2GW2 (Aug. 31, 2018)
10/1/18	11 Day Pre-General Report, p. 14	Facebook/Web	\$297.96	Ref. No. WXVWSH2HW2 (Sept. 30, 2018)
11/1/18	42 Day Post-General Report, p. 19	Facebook/Web	\$440.19	Ref. No. 72VHAKNGW2 (Oct. 31, 2018)
12/3/18	42 Day Post-General Report, p. 22	Facebook/Web	\$347.91	Ref. No. T9UKKJ2HW2 (Nov. 30, 2018)
1/2/19	Apr. 2019 Report, p. 4	Facebook/Web	\$439.89	Ref. No. 6XQ8BJWGW2 (Dec. 31, 2018)

<sup>40</sup> Had the ads been made to influence an election, they would have needed a “paid for by” disclaimer that included the name and address of the payor and an indication of whether the advertisement was authorized by a candidate or candidate’s authorized committee. *Id.* § 1014(1), (2), (2-A). The lack of this additional information is further proof that the intent at the time each ad was run was not to influence an election.

<sup>41</sup> HDCC, 2018 42-Day Post General Report at 3.

2/1/19	Apr. 2019 Report, p. 5	Facebook/Web	\$248.20	Ref. No. 5EQNFLNGW2 (Jan. 31, 2019)
3/1/19	Apr. 2019 Report, p. 6	Facebook/Web	\$231.79	Ref. No. BYXY8K6GW2 (Feb. 28, 2019)
4/1/19	July 2019 Report, p. 3	Facebook/Web	\$239.99	Ref. No. JXGDQK6HW2 (Mar. 31, 2019)
5/1/19	July 2019 Report, p. 4	Facebook/Web	\$146.19	Ref. No. G6L3YKSGW2 (Apr. 30, 2019)
6/3/19	July 2019 Report, p. 5	Facebook/Web	\$96.11	Ref. No. 5YTXQLAHW2 (May 31, 2019)
7/1/19	Oct. 2019 Report, p. 8	Facebook/Web	\$58.33	Ref. No. VBNNJNNGW2 (June 30, 2019)
			\$3,304.11	Total

Because each payment for these officially-connected expenses was timely and accurately reported by HDCC, neither HDCC nor the Leadership PAC violated Me. Rev. Stat. tit. 21-A, § 1060(7), which governs the reporting of operational expenses, such as officially-connected advertisements like these.<sup>42</sup>

### 3. These ads did not violate Maine’s disclaimer requirements

Maine law only requires communications made for the purpose of influencing an election to include a disclaimer. When a disclaimer is required, the disclaimer must include the name and address of the payor and a statement indicating whether a candidate or candidate’s committee has authorized the advertisement.<sup>43</sup>

For example, Maine requires a disclaimer in any paid digital advertisement that expressly advocates for the election or defeat of a candidate or that depicts a clearly identified candidate in the months leading up to their election—e.g. after Labor Day in an election year.<sup>44</sup> However, the law explicitly exempts from its disclaimer requirements any “communication [that] was not made for the purpose of influencing the candidate’s nomination for election or election.”<sup>45</sup>

Each ad highlighted in Dr. Kouzounas’s complaint did name or depict a clearly identified candidate, Speaker Gideon, either in the ad itself or through the account name. However, as explained above, none of these ads were made for the purpose of influencing an election. As such, they did not require any disclaimer under Maine law and therefore, the fact that they did not contain a disclaimer listing HDCC’s name and address and indicating whether they had been authorized by a candidate or candidate’s committee did not violate Maine law.

<sup>42</sup> Additionally, because these payments were timely and accurately reported, and because these payments were for officially-connected expenses, neither the Leadership PAC nor HDCC violated Me. Rev. Stat. tit. 21-A, § 1060(4), which governs the reporting of expenditures made to “initiate or influence any campaign.”

<sup>43</sup> *Id.* § 1014(1), (2), (2-A).

<sup>44</sup> *Id.* §§ 1014, 1055.

<sup>45</sup> *Id.* § 1014(2-A).



**CONCLUSION**

As demonstrated above, Respondents and HDCC did not violate any Maine laws by running the Facebook ads highlighted in Dr. Kouzounas's complaint. The payment for each advertisement was timely and properly reported by HDCC and none of these ads were contributions to Speaker Gideon's campaign. While the mislabeling of the payor of these official-side ads was an oversight, it did not amount to a violation of Maine law in any respect. As such, the Commission should deny Dr. Kouzounas's request for an investigation and dismiss this complaint.

Very truly yours,



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# EXHIBIT A

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Feb 28, 2018, 6:21 AM**

Payment Method  
**MasterCard**   
Reference Number: PUJH8FAHW2

Transaction ID  
**1576792615771347-3219849**

Product Type  
**Facebook**

Paid

**\$56.11 USD**

Remaining ad costs at the end of the month.

## Campaigns


<b>Ongoing Website Promotion</b> <a href="http://speakergideon.us15.list-manage.com/subscribe/post?u=8d51a823c9ba4a4add21fff1c...">http://speakergideon.us15.list-manage.com/subscribe/post?u=8d51a823c9ba4a4add21fff1c...</a>	<b>\$56.11</b>
From Jan 31, 2018, 12:00 AM to Feb 27, 2018, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Mar 31, 2018, 7:27 AM**

Payment Method  
**MasterCard**   
Reference Number: 37UB5FWGW2

Transaction ID  
**1565683323548940-3300268**

Product Type  
**Facebook**

Paid

**\$61.91 USD**

Remaining ad costs at the end of the month.

## Campaigns

Ongoing Website Promotion <a href="http://speakergideon.us15.list-manage.com/subscribe/post?u=8d51a823c9ba4a4add21fff1c...">http://speakergideon.us15.list-manage.com/subscribe/post?u=8d51a823c9ba4a4add21fff1c...</a>	<b>\$61.91</b>
From Feb 27, 2018, 12:00 AM to Mar 30, 2018, 11:59 PM	




# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Apr 30, 2018, 7:01 AM**

Payment Method  
**MasterCard**   
Reference Number: 9ZFGSFAHW2

Paid

**\$59.93 USD**

Remaining ad costs at the end of the month.

Transaction ID  
**1639588189491789-3376004**

Product Type  
**Facebook**

## Campaigns


<b>Ongoing Website Promotion</b> <a href="http://speakergideon.us15.list-manage.com/subscribe/post?u=8d51a823c9ba4a4add21fff1c...">http://speakergideon.us15.list-manage.com/subscribe/post?u=8d51a823c9ba4a4add21fff1c...</a>	<b>\$59.93</b>
From Mar 30, 2018, 12:00 AM to Apr 29, 2018, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**May 31, 2018, 7:57 AM**

Payment Method  
**MasterCard\***   
Reference Number: XE9XMFGW2

Paid

**\$62.07 USD**

Transaction ID  
**1623727891077815-3454809**

Remaining ad costs at the end of the month.

Product Type  
**Facebook**

## Campaigns


<b>Ongoing Website Promotion</b> <a href="http://speakergideon.us15.list-manage.com/subscribe/post?u=8d51a823c9ba4a4add21fff1c...">http://speakergideon.us15.list-manage.com/subscribe/post?u=8d51a823c9ba4a4add21fff1c...</a>	<b>\$62.07</b>
From Apr 29, 2018, 12:00 AM to May 30, 2018, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Jun 30, 2018, 6:48 AM**

Payment Method  
**MasterCard**   
Reference Number: HK2XYFSGW2

Paid

**\$21.52 USD**

Transaction ID  
**1662152267235377-3534769**

Remaining ad costs at the end of the month.

Product Type  
**Facebook**

## Campaigns


<b>Ongoing Website Promotion</b> <a href="http://speakergideon.us15.list-manage.com/subscribe/post?u=8d51a823c9ba4a4add21fff1c...">http://speakergideon.us15.list-manage.com/subscribe/post?u=8d51a823c9ba4a4add21fff1c...</a>	<b>\$13.33</b>
From May 31, 2018, 12:00 AM to Jun 28, 2018, 11:59 PM	
<b>Website Promotion 2</b>	<b>\$8.19</b>
From May 31, 2018, 12:00 AM to Jun 28, 2018, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Jul 31, 2018, 6:16 AM**

Payment Method  
**MasterCard**   
Reference Number: BAE38GJGW2

**Failed**

## \$218.19 USD

Transaction ID  
**1687095924741009-3619706**

Remaining ad costs at the end of the month.

Product Type  
**Facebook**

### Campaigns

<b>Website Promotion 2</b>	<b>\$157.84</b>
From Jun 29, 2018, 12:00 AM to Jul 30, 2018, 11:59 PM	
<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$43.56</b>
From Jun 29, 2018, 12:00 AM to Jul 30, 2018, 11:59 PM	
<b>Post: "Serving as the Speaker of the House is both the..."</b>	<b>\$16.79</b>
From Jun 29, 2018, 12:00 AM to Jul 30, 2018, 11:59 PM	



# EXHIBIT B

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Jul 31, 2018, 6:53 AM**

Payment Method  
**MasterCard** B  
Reference Number: EYGFUGAHW2

**Failed**

## \$218.19 USD

You made this manual payment.

Transaction ID  
**1758320887618518-3620476**

Product Type  
**Facebook**

### Campaigns

<b>Website Promotion 2</b>	<b>\$157.84</b>
From Jun 29, 2018, 12:00 AM to Jul 30, 2018, 11:59 PM	
<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$43.56</b>
From Jun 29, 2018, 12:00 AM to Jul 30, 2018, 11:59 PM	
<b>Post: "Serving as the Speaker of the House is both the..."</b>	<b>\$16.79</b>
From Jun 29, 2018, 12:00 AM to Jul 30, 2018, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Jul 31, 2018, 6:54 AM**

Payment Method  
**MasterCard** B  
Reference Number: 7ZGFUGAHW2

Paid

## \$218.19 USD

Transaction ID  
**1758320970951843-3620490**

You made this manual payment.

Product Type  
**Facebook**

### Campaigns


<b>Website Promotion 2</b>	<b>\$157.84</b>
From Jun 29, 2018, 12:00 AM to Jul 30, 2018, 11:59 PM	
<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$43.56</b>
From Jun 29, 2018, 12:00 AM to Jul 30, 2018, 11:59 PM	
<b>Post: "Serving as the Speaker of the House is both the..."</b>	<b>\$16.79</b>
From Jun 29, 2018, 12:00 AM to Jul 30, 2018, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Jul 31, 2018, 6:53 AM**

Payment Method  
**MasterCard**   
Reference Number: JYGFUGAHW2

Transaction ID  
**1758320900951850-3620479**

Product Type  
**Instagram**

Paid

**\$2.33 USD**

You made this manual payment.

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## Campaigns

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### Website Promotion 2

From Jun 27, 2018, 12:00 AM to Jul 30, 2018, 11:59 PM

**\$2.33**



# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Aug 31, 2018, 4:50 AM**

Payment Method  
**MasterCard** **B**  
Reference Number: JVMCVGSGW2

Paid

**\$37.03 USD**

Transaction ID  
**1761505220633414-3696899**

Remaining ad costs at the end of the month.

Product Type  
**Facebook**

## Campaigns


<b>Website Promotion 2</b>	<b>\$23.13</b>
From Aug 24, 2018, 12:00 AM to Aug 29, 2018, 11:59 PM	
<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$13.90</b>
From Aug 24, 2018, 12:00 AM to Aug 29, 2018, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Aug 25, 2018, 10:10 AM**

Payment Method  
**MasterCard**   
Reference Number: 8D5A4H6HW2

Paid

## \$500.00 USD

Transaction ID  
**1785697184880887-3682947**

You're being billed because you reached your \$500.00 billing threshold.

Product Type  
**Facebook**

### Campaigns

<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$75.99</b>
From Jul 31, 2018, 12:00 AM to Aug 25, 2018, 10:00 AM	
<b>Website Promotion 2</b>	<b>\$126.89</b>
From Jul 31, 2018, 12:00 AM to Aug 25, 2018, 10:00 AM	
<b>Post: "Serving as the Speaker of the House is both the..."</b>	<b>\$283.21</b>
From Jul 31, 2018, 12:00 AM to Aug 25, 2018, 10:00 AM	
<b>Post: "Want to learn more about what I've been working..."</b>	<b>\$13.91</b>
From Jul 31, 2018, 12:00 AM to Aug 25, 2018, 10:00 AM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Sep 30, 2018, 6:01 AM**

Payment Method  
**MasterCard\*** B  
Reference Number: WXVWSH2HW2

Paid

## \$297.96 USD

Transaction ID  
**1864861196964484-3768444**

Remaining ad costs at the end of the month.

Product Type  
**Facebook**

### Campaigns


<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$93.00</b>
From Aug 29, 2018, 12:00 AM to Sep 29, 2018, 11:59 PM	
<b>Website Promotion 2</b>	<b>\$154.96</b>
From Aug 29, 2018, 12:00 AM to Sep 29, 2018, 11:59 PM	
<b>Post: "Want to stay updated on the latest news from the..."</b>	<b>\$50.00</b>
From Aug 29, 2018, 12:00 AM to Sep 29, 2018, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Oct 31, 2018, 4:43 AM**

Payment Method  
**MasterCard**   
Reference Number: 72VHAKNGW2

Paid

## \$440.19 USD

Transaction ID  
**2031210223662910-3841802**

Remaining ad costs at the end of the month.

Product Type  
**Facebook**

### Campaigns

<b>Website Promotion 2</b>	<b>\$150.03</b>
From Sep 30, 2018, 12:00 AM to Oct 29, 2018, 11:59 PM	
<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$90.16</b>
From Sep 30, 2018, 12:00 AM to Oct 29, 2018, 11:59 PM	
<b>HDO Video Second Run</b>	<b>\$200.00</b>
From Sep 30, 2018, 12:00 AM to Oct 29, 2018, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Nov 30, 2018, 6:39 AM**

Payment Method  
**MasterCard** B  
Reference Number: T9UKKJ2HW2

Paid

## \$347.92 USD

Transaction ID  
**1951035258347077-3920899**

Remaining ad costs at the end of the month.

Product Type  
**Facebook**

### Campaigns

<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$92.96</b>
From Oct 29, 2018, 12:00 AM to Nov 29, 2018, 11:59 PM	
<b>Website Promotion 2</b>	<b>\$154.96</b>
From Oct 29, 2018, 12:00 AM to Nov 29, 2018, 11:59 PM	
<b>Post: "Both this morning and at the end of today, here's..."</b>	<b>\$50.00</b>
From Oct 29, 2018, 12:00 AM to Nov 29, 2018, 11:59 PM	
<b>Post: "Last night's results mean we can truly get to..."</b>	<b>\$50.00</b>
From Oct 29, 2018, 12:00 AM to Nov 29, 2018, 11:59 PM	




# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Dec 31, 2018, 2:58 AM**

Payment Method  
**MasterCard**   
Reference Number: 6XQ8BJWGW2

Paid

**\$439.89 USD**

Transaction ID  
**1921860364597899-3998730**

Remaining ad costs at the end of the month.

Product Type  
**Facebook**

## Campaigns

<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$89.88</b>
From Nov 30, 2018, 12:00 AM to Dec 29, 2018, 11:59 PM	
<b>Website Promotion 2</b>	<b>\$150.01</b>
From Nov 30, 2018, 12:00 AM to Dec 29, 2018, 11:59 PM	
<b>Post: "One year ago, the US Senate passed a disastrous..."</b>	<b>\$200.00</b>
From Nov 30, 2018, 12:00 AM to Dec 29, 2018, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Jan 31, 2019, 5:31 AM**

Payment Method  
**MasterCard** B  
Reference Number: 5EQNFLNGW2

Transaction ID  
**2161064924010772-4078627**

Product Type  
**Facebook**

Paid

## \$248.20 USD

Remaining ad costs at the end of the month.

### Campaigns

<b>Website Promotion 2</b>	<b>\$155.01</b>
From Dec 30, 2018, 12:00 AM to Jan 29, 2019, 11:59 PM	
<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$93.19</b>
From Dec 30, 2018, 12:00 AM to Jan 29, 2019, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Feb 28, 2019, 9:34 AM**

Payment Method  
**MasterCard\*** B  
Reference Number: BYXY8K6GW2

Paid

## \$231.79 USD

Transaction ID  
**2025868157530446-4158833**

Remaining ad costs at the end of the month.

Product Type  
**Facebook**

### Campaigns


<b>Website Promotion 2</b>	<b>\$144.87</b>
From Jan 30, 2019, 12:00 AM to Feb 27, 2019, 11:59 PM	
<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$86.92</b>
From Jan 30, 2019, 12:00 AM to Feb 27, 2019, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Mar 31, 2019, 3:25 AM**

Payment Method  
**MasterCard**   
Reference Number: JXGDQK6HW2

Transaction ID  
**2079665615484041-4246401**

Product Type  
**Facebook**

Paid

**\$239.99 USD**

Remaining ad costs at the end of the month.

## Campaigns

<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$89.97</b>
From Feb 27, 2019, 12:00 AM to Mar 29, 2019, 11:59 PM	
<b>Website Promotion 2</b>	<b>\$150.02</b>
From Feb 27, 2019, 12:00 AM to Mar 29, 2019, 11:59 PM	

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Apr 30, 2019, 4:16 AM**

Payment Method  
**MasterCard\*** B  
Reference Number: G6L3YKSGW2

Paid

## \$146.19 USD

Transaction ID  
**2106546352795964-4335447**

Remaining ad costs at the end of the month.

Product Type  
**Facebook**

### Campaigns

<b>Website Promotion 2</b>	<b>\$56.36</b>
From Mar 30, 2019, 12:00 AM to Apr 28, 2019, 11:59 PM	
<b>[07/16/2018] Promoting Speaker Sara Gideon</b>	<b>\$89.83</b>
From Mar 30, 2019, 12:00 AM to Apr 28, 2019, 11:59 PM	



# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**May 31, 2019, 7:12 AM**

Payment Method  
**MasterCard<sup>®</sup>** B  
Reference Number: 5YTXQLAHW2

Transaction ID  
**2193517400765529-4432146**

Product Type  
**Facebook**

Paid

**\$96.11 USD**

Remaining ad costs at the end of the month.

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## Campaigns

**[07/16/2018] Promoting Speaker Sara Gideon**

From Apr 29, 2019, 12:00 AM to May 30, 2019, 11:59 PM

**\$96.11**

# Receipt for Mary-Erin Casale

Account ID: 20701528



Invoice/Payment Date  
**Jun 30, 2019, 5:01 AM**

Payment Method  
**MasterCard<sup>®</sup>** B  
Reference Number: VBNNJNNGW2

Transaction ID  
**2395239807259948-4525918**

Product Type  
**Facebook**

Paid

**\$58.33 USD**

Remaining ad costs at the end of the month.

## Campaigns

**[07/16/2018] Promoting Speaker Sara Gideon**

From May 31, 2019, 12:00 AM to Jun 19, 2019, 11:59 PM

**\$58.33**

**Facebook Invoices Paid by House Democratic Campaign Committee  
(drawn from Facebook Ad Library and Facebook invoices in Exh. B to Gideon Response)**

Sequence in Kouzounas Complaint, Exh. C	Number of Ad in Gideon Response, pages 3-8	Beginning Sentence in Ad	Links to	Referenced in Facebook Invoices	Start date	End date (based on Facebook ad library or Gideon response)	Total cost (complied by Commission staff based on invoices)
First	2	Learn more about Maine's Speaker of the House and the current news from our Capitol.	Facebook page for Speaker Sara Gideon	Promoting Speaker Sara Gideon	7/16/2018	June 2019	\$1,013.80
Second	4	Want to learn more about what I've been working on?	www.speakersaragideon.com	Post: "Want to learn more about what I've been working ..."	8/7/2018	8/14/2018	\$13.91
Third	5	Want to stay updated on the latest news from the Speaker's Office?	www.speakersaragideon.com	Post: "Want to stay updated on the latest news from the ..."	9/7/2018	9/14/2018	\$50.00
Fourth	3	Serving as the Speaker of the House is both the most rewarding and most challenging job I've ever held.	No link - four minute video about House Democratic caucus is embedded	Post: "Serving as the Speaker of the House is both the ..." and HDO Video Second Run	7/30/2018	10/27/2018	\$500.00
Fifth	6	Both this morning and at the end of today, here's what I'm thinking and what I'll continue to carry forward in my heart.	www.speakersaragideon.com	Post: "Both this morning and at the end of today, here's ..."	11/6/2018	11/7/2018	\$50.00
Sixth	8	One year ago, the US Senate passed a disastrous bill that that has had negative impacts across the board and Maine's senator cast the lynchpin vote.	Op-Ed on www.bangordailynews.com criticizing Susan Collins	Post: "One year ago, the US Senate passed a disastrous ..."	12/19/2018	12/29/2018	\$200.00
---	1	Speaker Sara Gideon believes that Maine people are our best resource, that our students deserve our investment ....*	www.speakersaragideon.com	Website Promotion 2	6/27/2018	April 2019	\$1,426.41
---	7	Last night's results mean we can truly get to work improving the lives of Maine people.	www.speakersaragideon.com	Post: "Last night's results mean we can truly get to ..."	11/7/2018	11/14/2018	\$50.00
						<b>Total</b>	<b>\$3,304.12</b>

Note: To reconcile this total with the \$3,373 total in the Facebook ad library for the Speaker Sara Gideon account, please note that the costs listed above do not include a \$8.19 payment charged to the Gideon Leadership PAC (Exh. A to Gideon response, fifth invoice) and payment(s) for roughly \$61, also apparently charged to the Gideon Leadership PAC for website production (Exh. A to Gideon Response).



7/31/2018	Androscoggin County Democratic Committee PO Box 1114 Lewiston, ME, 04243-1114	Contribution	CON	\$200.00
7/31/2018	MAINE AFL-CIO 21 GABRIEL DRIVE AUGUSTA, ME, 04330	Contribution	CON	\$1,800.00
8/1/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$220.52
8/1/2018	Maine Bay Canvas 53 Industrial Way Portland, ME, 04103	Fundraiser	FND	\$650.00
8/1/2018	MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME, 04332	Contribution	CON	\$30,000.00
8/6/2018	Moonlighting Production Services 470 RIVERSIDE STREET PORTLAND, ME, 04103	Fundraiser	FND	\$668.50
8/6/2018	HANNAFORD 295 Forest Avenue Portland, ME, 04101	Fundraiser	FND	\$668.94
8/6/2018	Rising Tide Brewing Company 103 Fox Street Portland, ME, 04101	Fundraiser	FND	\$267.45
8/6/2018	Maine Beer Company 525 U.S. Route 1 Freeport, ME, 04032	Fundraiser	FND	\$127.80
8/6/2018	Maine Hardware 274 ST. JOHN STREET PORTLAND, ME, 04102	Fundraiser	FND	\$100.70
8/6/2018	Bow Street Beverage 495 Forest Avenue Portland, ME, 04101	Fundraiser	FND	\$59.64
8/6/2018	7-ELEVEN 27 WASHINGTON AVE PORTLAND, ME, 04101	Fundraiser	FND	\$35.48
8/6/2018	Staples 244 Route 1 Falmouth, ME, 04105	Office Supplies	OFF	\$42.83
8/6/2018	Independent Restaurant Supply 736 Riverside Street Portland, ME, 04103	Fundraiser	FND	\$30.60
8/8/2018	Slack 436 Lafayette Street New York, NY, 10003	Hosting	WEB	\$96.00
8/8/2018	Bread and Butter 73 Main Street South Portland, ME, 04102	Fundraising	FND	\$1,890.00
8/10/2018	River Front Barbeque & Grille 300 WATER STREET AUGUSTA, ME, 04330	Food	FOD	\$136.39

8/14/2018	Staples 244 Route 1 Falmouth, ME, 04105	Office Supplies	OFF	\$34.79
8/15/2018	Kennebec Savings 150 State Street, PO Box 50 Augusta, ME, 04332	Bank Fee	OTH	\$5.00
8/15/2018	MOLLY BOGART ONE CENTER STREET BRUNSWICK, ME, 04011	Travel Reimbursement	TRV	\$629.87
8/15/2018	MARC MALON 567 POOL STREET BIDDEFORD, ME, 04005	Travel Reimbursement	TVN	\$460.23
8/15/2018	BENJAMIN FRECH 962 SHORE ROAD CAPE ELIZABETH, ME, 04107	Travel Reimbursement	CON	\$349.66
8/15/2018	APRIL THIBODEAU 25 NORTH NEWCASTLE ROAD NEWCASTLE, ME, 04553	Travel Reimbursement	TRV	\$123.12
8/15/2018	Olivia Watson 806 Foreside Road Topsham, ME, 04086	Travel Reimbursement	TRV	\$150.07
8/15/2018	Brian Colleran 850 River Road Richmond, ME, 04357	Travel Reimbursement	CON	\$1,406.14
8/15/2018	Sabrina Gattine 529 Stroudwater Street Westbrook, ME, 04092	Travel Reimbursement	TRV	\$449.72
8/15/2018	Spencer Toth 129 Forest Avenue Bangor, ME, 04401	Travel Reimbursement	TRV	\$91.80
8/15/2018	Julianne McLaughlin 139 Cony Street Augusta, ME, 04330	231.17	TRV	\$310.06
8/15/2018	Jacob Lewin 203 Old Stage Road Norway, ME, 04268	Travel Reimbursement	TRV	\$651.41
8/20/2018	MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME, 04332	Contribution	CON	\$27,000.00
8/21/2018	Dunkin' Donuts 67 Sewall Avenue Augusta, ME, 04330	Food	FOD	\$5.29
8/22/2018	QUILL BOOKS AND BEVERAGE 1 WESTBROOK COMMON WESTBROOK, ME, 04092	Fundraiser	FND	\$664.63
8/23/2018	OLSON CONSULTING 5 THE LEDGES HALLOWELL, ME, 04347	Consulting	CNS	\$6,000.00
8/27/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$500.00





8/27/2018	Sean Smith 18 Kellogg St. Apt 1 Portland, ME, 04101	Travel Reimbursement	TRV	\$1,814.10
8/31/2018	Kennebec Savings 150 State Street, PO Box 50 Augusta, ME, 04332	Bank Fee	OTH	\$13.60
8/31/2018	SWEET CHILI THAI 75 AIRPORT ROAD AUGUSTA, ME, 04330	Food	FOD	\$78.52
8/31/2018	MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME, 04332	Contribution	CON	\$32,000.00
9/4/2018	Maine Hosting 122 FRONT STREET BATH, ME, 04530	Hosting	WEB	\$22.34
9/4/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Hosting	WEB	\$37.03
9/4/2018	Precision New Media 456 South Front Street Columbus, OH, 43215	Consulting	CNS	\$2,000.00
9/6/2018	Maine Hosting 122 FRONT STREET BATH, ME, 04530	Hosting	WEB	\$7.04
9/6/2018	Blazes Burgers 652 Main Street Westbrook, ME, 04092	Food	FOD	\$12.21
9/6/2018	HANNAFORD 295 Forest Avenue Portland, ME, 04101	Office Supplies	OFF	\$23.37
9/7/2018	East Shore Studio and Print 48 Free Street Portland, ME, 04101	Consulting	CNS	\$474.75
9/10/2018	Slack 436 Lafayette Street New York, NY, 10003	Hosting	WEB	\$94.70
9/10/2018	Act Blue 14 Arrow Street Suit 11 Cambridge, MA, 02138	Bank Fee	OTH	\$497.22
9/12/2018	FEDEX OFFICE 50 MONUMENT WAY PORTLAND, ME, 04101	Office Supplies	OFF	\$7.54
9/12/2018	Maine District Court 205 Newbury Street Portland, ME, 04101	Copies	OTH	\$67.00
9/12/2018	Kennebec Savings 150 State Street, PO Box 50 Augusta, ME, 04332	Bank Fee	OTH	\$5.00
9/13/2018	Fajita Grill 857 Main Street Westbrook, ME, 04092	Food	FOD	\$61.70



**SCHEDULE B-1  
OPERATING EXPENDITURES**

EXPENDITURE TYPES	
CNS Campaign consultants	CON Contribution to other candidate, party, committee
EQP Equipment (office machines, furniture, cell phones, etc.)	FND Fundraising events
FOD Food for campaign events, volunteers	LIT Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)
MHS Mail house (all services purchased)	OFF Office supplies, phone and internet services, rent and utilities
OTH Other (bank fees, entrance fees, small tools, wood, etc.)	PHO Phone banks, automated telephone calls
POL Polling and survey research	POS Postage for U.S. Mail and mail box fees
PRO Other professional services	PRT Print media ads only (newspapers, magazines, etc.)
RAD Radio ads, production costs	SAL Campaign workers' salaries and personnel costs
TRV Travel (fuel, mileage, lodging, etc.)	TVN TV or cable ads, production costs
WEB Online advertising, website design, maintenance, hosting, etc.	



DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/1/2018	HANNAFORD 295 Forest Avenue Portland, ME, 04101	Fundraising	FND	\$493.01
10/1/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$297.96
10/1/2018	McTeague Higbee 4 UNION PARK TOPSHAM, ME, 04086	Legal Services	PRO	\$750.00
10/1/2018	Jacob Lewin 203 Old Stage Road Norway, ME, 04268	Travel Reimbursement	TRV	\$397.28
10/2/2018	FEDEX OFFICE 50 MONUMENT WAY PORTLAND, ME, 04101	Office Supplies	OFF	\$12.34
10/2/2018	HANNAFORD 295 Forest Avenue Portland, ME, 04101	Fundraising	FND	\$230.95
10/2/2018	MEGUNTICOOK MARKET 2 GOULD STREET CAMDEN, ME, 04843	Fundraising	FND	\$333.07
10/2/2018	NGP Software Inc. 1225 Eye St NW STE 1225 Washington, DC, 20005	Fundraising	WEB	\$750.00
10/2/2018	Julianne McLaughlin 139 Cony Street Augusta, ME, 04330	Travel Reimbursement	TRV	\$108.81
10/3/2018	Drouthy Bear 50 Elm Street Camden, ME, 04843	Food	FOD	\$149.85
10/3/2018	Bread and Butter 73 Main Street South Portland, ME, 04102	Fundaising	FND	\$486.00
10/4/2018	Harmon's and Barton's 584 CONGRESS STREET PORTLAND, ME, 04101	Fundraising	FND	\$79.13

10/30/2018	BENJAMIN FRECH 962 SHORE ROAD CAPE ELIZABETH, ME, 04107	Travel Reimbursement	TRV	\$357.32
10/30/2018	Act Blue 14 Arrow Street Suit 11 Cambridge, MA, 02138	Bank Fee	OTH	\$412.80
10/30/2018	Olivia Watson 806 Foreside Road Topsham, ME, 04086	Travel Reimbursement	TRV	\$310.81
10/30/2018	Brian Colleran 850 River Road Richmond, ME, 04357	Travel Reimbursement	TRV	\$960.77
10/30/2018	Spencer Toth 129 Forest Avenue Bangor, ME, 04401	Travel Reimbursement	TRV	\$276.26
10/30/2018	Sabrina Gattine 529 Stroudwater Street Westbrook, ME, 04092	Travel Reimbursement	TRV	\$593.93
10/30/2018	Alyssa Frost 61 Washburn Avenue Portland, ME, 04102	Travel Reimbursement	TRV	\$325.94
10/31/2018	Kennebec Savings Bank 150 State St Augusta, ME, 04330	Bank Fee	OTH	\$24.24
10/31/2018	HANNAFORD 295 Forest Avenue Portland, ME, 04101	Office Supplies	OFF	\$28.31
10/31/2018	Pizza Joint 448 Forest Avenue Portland, ME, 04101	Food	FOD	\$158.33
11/1/2018	Portland Harbor Hotel 468 Fore Street Portland, ME, 04101	Fundraising	FND	\$3,296.24
11/1/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$440.19
11/1/2018	Kennebec Savings Bank 150 State St Augusta, ME, 04330	Bank Fee	OTH	\$5.00
11/1/2018	Act Blue 14 Arrow Street Suit 11 Cambridge, MA, 02138	Bank Fee	OTH	\$417.77
11/1/2018	Mike Labriola 150 NEAL STREET PORTLAND, ME, 04102	Consulting	CNS	\$1,500.00
11/2/2018	Staples Falmouth 244 U.S. Rt. 1 Falmouth, ME, 04105	Office Supplies	OFF	\$64.12
11/2/2018	MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME, 04332	Contribution	CON	\$250,000.00





12/3/2018	Little Tap House 106 HIGH STREET PORTLAND, ME, 04101	Food	FOD	\$54.28
12/3/2018	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	FaceBook	WEB	\$347.91
12/3/2018	Act Blue 14 Arrow Street Suit 11 Cambridge, MA, 02138	Bank Fee	OTH	\$28.28
12/4/2018	Act Blue 14 Arrow Street Suit 11 Cambridge, MA, 02138	Bank Fee	OTH	\$92.45
12/7/2018	OLSON CONSULTING 5 THE LEDGES HALLOWELL, ME, 04347	Consulting	CNS	\$10,000.00
12/11/2018	MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME, 04332	Contribution	CON	\$25,000.00
<b>TOTAL OPERATING EXPENDITURES</b>				\$326,578.25

**SCHEDULE B-1  
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
1/2/2019	NGP VAN Inc. 1101 15th Street, NW Suite 500 Washington, DC, 20005	Fundraising	FND	\$750.00
1/2/2019	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$439.89
1/2/2019	FEDEX OFFICE 50 MONUMENT WAY PORTLAND, ME, 04101	Office Supplies	OFF	\$0.14
1/3/2019	Act Blue 14 Arrow Street Suit 11 Cambridge, MA, 02138	Bank Fee	OTH	\$98.75
1/3/2019	MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME, 04332	Contribution	CON	\$75,000.00
1/7/2019	Rivalries 10 COTTON STREET PORTLAND, ME, 04101	Food	FOD	\$76.02
1/9/2019	MARC MALON 567 POOL STREET BIDDEFORD, ME, 04005	Travel Reimbursement	TRV	\$316.87
1/9/2019	JONATHAN HILLIER 7 OLD LEWISTON ROAD MONMOUTH, ME, 04249	Compensation	SAL	\$3,000.00
1/10/2019	River Front Barbeque & Grille 300 WATER STREET AUGUSTA, ME, 04330	Food	FOD	\$102.68
1/17/2019	Timber Kitchen & Bar 22 Bass Park Blvd. Bangor, ME, 04401	Travel	TRV	\$57.55
1/18/2019	Residence Inn 22 Bass Park Blvd. Bangor, ME, 04401	Travel	TRV	\$178.98





1/24/2019	Blue Spoon 89 Congress Street Portland, ME, 04101	Food	FOD	\$52.12
1/25/2019	CUSHNOC BREWING CO. 243 WATER STREET AUGUSTA, ME, 04330	Food	FOD	\$87.36
1/25/2019	East Shore Studio and Print 48 Free Street Portland, ME, 04101	Graphic Design	PRO	\$1,500.00
1/28/2019	FORAGE MARKET 180 LISBON STREET LEWISTON, ME, 04240	Food	FOD	\$55.61
1/31/2019	Kennebec Savings Bank 150 STATE ST. AUGUSTA, ME, 04330	Bank Fee	OTH	\$6.16
2/1/2019	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$248.20
2/1/2019	Staples 244 Route 1 Falmouth, ME, 04105	Office Supplies	OFF	\$6.03
2/4/2019	AMERICAN AIRLINES 4333 AMON CARTER BLVD FORT WORTH, TX, 76155	Travel	TRV	\$776.09
2/4/2019	AMAZON P.O. BOX 81226 SEATTLE, WA, 98108	Office Supplies	OFF	\$31.15
2/5/2019	The Darcy 1515 Rhode Island Avenue, NW Washington, DC, 20005	Travel	TRV	\$388.97
2/6/2019	USPS 73 Hammond Street Bangor, ME, 04402	Postage	POS	\$51.00
2/11/2019	MARGARITAS 390 WESTERN AVE. AUGUSTA, ME, 04330	Food	FOD	\$24.44
2/15/2019	Fat Cats Cafe 256 State Street Augusta, ME, 04330	Food	FOD	\$177.12
2/19/2019	DROPBOX.COM 185 BERRY STREET SAN FRANCISCO, CA, 94107	Online Hosting	WEB	\$9.99
2/19/2019	Staples 14 CROSSING WAY AUGUSTA, ME, 04330	Office Supplies	OFF	\$6.32
2/20/2019	Staples 1131 UNION STREET BANGOR, ME, 04401	Office Supplies	OFF	\$12.88
2/20/2019	Staples 14 CROSSING WAY AUGUSTA, ME, 04330	Office Supplies	OFF	\$0.23
2/20/2019	Cafe Creme 56 FRONT STREET BATH, ME, 04530	Food	FOD	\$5.72



2/21/2019	JONATHAN HILLIER 7 OLD LEWISTON ROAD MONMOUTH, ME, 04249	Travel Reimbursement	TRV	\$22.00
2/22/2019	Staples 1131 UNION STREET BANGOR, ME, 04401	Office Supplies	OFF	\$58.14
2/22/2019	MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME, 04332	Contribution	CON	\$30,000.00
2/25/2019	USPS 73 Hammond Street Bangor, ME, 04402	Postage	POS	\$25.50
2/28/2019	Kennebec Savings Bank 150 State St Augusta, ME, 04330	Bank Fee	OTH	\$6.26
3/1/2019	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$231.79
3/6/2019	Shaw's 150 WESTERN AVENUE AUGUSTA, ME, 04330	Office Supplies	OFF	\$116.55
3/7/2019	Staples 1131 UNION STREET BANGOR, ME, 04401	Office Supplies	OFF	\$18.98
3/7/2019	College Carry Out 126 Mount Vernon Avenue Augusta, ME, 04330	Food	FOD	\$116.90
3/8/2019	Staples 1131 UNION STREET BANGOR, ME, 04401	Office Supplies	OFF	\$107.86
3/11/2019	Staples 14 CROSSING WAY AUGUSTA, ME, 04330	Office Supplies	OFF	\$37.26
3/11/2019	AT&T P.O. Box 536216 Atlanta, GA, 30353	Cell Phones	EQP	\$547.62
3/12/2019	College Carry Out 126 Mount Vernon Avenue Augusta, ME, 04330	Food	FOD	\$85.86
3/13/2019	Nocturnem 56 MAIN STREET BANGOR, ME, 04401	Food	FOD	\$60.76
3/13/2019	GOOGLE 5 CAMBRIDGE CENTER CAMBRIDGE, MA, 02142	Online Hosting	WEB	\$132.09
3/14/2019	Maple Hill Farm 11 Inn Road Hallowell, ME, 04347	Food	FOD	\$52.00
3/15/2019	THE QUARRY TAP ROOM 122 WATER STREET HALLOWELL, ME, 04347	Food	FOD	\$28.52



**SCHEDULE B-1  
OPERATING EXPENDITURES**

EXPENDITURE TYPES				
CNS	Campaign consultants	CON	Contribution to other candidate, party, committee	
EQP	Equipment (office machines, furniture, cell phones, etc.)	FND	Fundraising events	
FOD	Food for campaign events, volunteers	LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	
MHS	Mail house (all services purchased)	OFF	Office supplies, phone and internet services, rent and utilities	
OTH	Other (bank fees, entrance fees, small tools, wood, etc.)	PHO	Phone banks, automated telephone calls	
POL	Polling and survey research	POS	Postage for U.S. Mail and mail box fees	
PRO	Other professional services	PRT	Print media ads only (newspapers, magazines, etc.)	
RAD	Radio ads, production costs	SAL	Campaign workers' salaries and personnel costs	
TRV	Travel (fuel, mileage, lodging, etc.)	TVN	TV or cable ads, production costs	
WEB	Online advertising, website design, maintenance, hosting, etc.			
DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
4/1/2019	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$239.99
4/1/2019	Shaw's 150 WESTERN AVENUE AUGUSTA, ME, 04330	Office Supplies	OFF	\$47.64
4/2/2019	NGP VAN Inc. 1101 15th Street, NW Suite 500 Washington, DC, 20005	Fundraising	WEB	\$750.00
4/2/2019	College Carry Out 126 Mount Vernon Avenue Augusta, ME, 04330	Food	FOD	\$72.76
4/3/2019	COMFORT INN 281 Civic Center Drive Augusta, ME, 04330	Travel	TRV	\$54.50
4/3/2019	GOOGLE 5 CAMBRIDGE CENTER CAMBRIDGE, MA, 02142	Google Suite	WEB	\$41.93
4/8/2019	Quality Copy & Digital Print 4 NORTH STREET HALLOWELL, ME, 04347	Office Supplies	OFF	\$104.00
4/9/2019	McTeague Higbee 4 UNION PARK TOPSHAM, ME, 04086	Legal Services	PRO	\$1,150.00
4/9/2019	Legislative Memorial Scholarship Auction PO Box 949 Augusta, ME, 04332	Contribution	CON	\$500.00
4/11/2019	Augusta Country Club P.O. Box 239 Manchester, NH, 04351	Food	FOD	\$55.86
4/15/2019	DROP BOX 185 BERRY STREET SAN FRANCISCO, CA, 94107	Online Hosting	WEB	\$9.99
4/16/2019	HANNAFORD 118 Cony Street Augusta, Me, 04330	Food	FOD	\$78.01



4/17/2019	Serendib 2 State Street Ellsworth, ME, 04605	Food	FOD	\$47.52
4/17/2019	Sean Smith PO BOX 53 BANGOR, ME, 04402	Travel Reimbursement	TRV	\$711.03
4/18/2019	USPS WATER STREET AUGUSTA, ME, 04330	Mail Box Fee	POS	\$144.00
4/19/2019	Starbucks 145 Commercial Street Portland, ME, 04101	Food	FOD	\$17.82
4/25/2019	Brian Colleran 850 River Road Richmond, ME, 04357	Insurance Reimbursement	SAL	\$2,284.55
4/29/2019	Staples Falmouth 244 U.S. Rt. 1 Falmouth, ME, 04105	Office Supplies	OFF	\$157.59
4/30/2019	Kennebec Savings Bank 150 State St Augusta, ME, 04330	Bank Fee	OTH	\$6.80
4/30/2019	Maine Hosting 122 FRONT STREET BATH, ME, 04530	Web Hosting	WEB	\$59.95
5/1/2019	AT&T 211 MARGINAL WAY PORTLAND, ME, 04101	Cell Phone	OFF	\$319.97
5/1/2019	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$146.19
5/2/2019	GOOGLE 5 CAMBRIDGE CENTER CAMBRIDGE, MA, 02142	Google Suite	WEB	\$77.56
5/10/2019	Staples 185 Bangor Mall Boulevard Bangor, ME, 04011	Office Supplies	OFF	\$4.30
5/13/2019	Broad Arrow Tavern 162 MAIN STREET FREEPORT, ME, 04032	Food	FOD	\$43.10
5/13/2019	Staples 1131 UNION STREET BANGOR, ME, 04401	Office Supplies	OFF	\$1.31
5/14/2019	Shaw's 150 WESTERN AVENUE AUGUSTA, ME, 04330	Food	FOD	\$126.72
5/14/2019	Staples 244 Route 1 Falmouth, ME, 04105	Office Supplies	OFF	\$14.07
5/15/2019	APPLE 364 MAINE MALL ROAD SOUTH PORTLAND, ME, 04106	Equipment	EQP	\$50.65
5/15/2019	DROPBOX.COM 185 BERRY STREET SAN FRANCISCO, CA, 94107	Online Hosting	WEB	\$9.99



5/24/2019	Maine Hosting 122 FRONT STREET BATH, ME, 04530	Online Hosting	WEB	\$109.45
5/28/2019	Staples 14 CROSSING WAY AUGUSTA, ME, 04330	Office Supplies	OFF	\$0.38
5/30/2019	Orono Brewing Company 26 State Street Bangor, ME, 04401	Food	FOD	\$37.50
5/30/2019	Circle K 183 CAPITOL STREET AUGUSTA, ME, 04330	Travel	TRV	\$29.07
5/31/2019	Kennebec Savings 150 State Street, PO Box 50 Augusta, ME, 04332	Bank Fee	OTH	\$6.08
5/31/2019	Sean Smith PO BOX 53 BANGOR, ME, 04402	Travel Reimbursement	TRV	\$1,311.28
5/31/2019	MAINE DEMOCRATIC STATE COMMITTEE 320 Water St, 3rd Flr P.O. Box 5258 Augusta, ME, 04332	Contribution	CON	\$20,000.00
6/3/2019	GOOGLE 5 CAMBRIDGE CENTER CAMBRIDGE, MA, 02142	Google Suite	WEB	\$78.00
6/3/2019	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$96.11
6/4/2019	OLSON CONSULTING 5 THE LEDGES HALLOWELL, ME, 04347	Consulting	CNS	\$6,148.00
6/5/2019	MARGARITAS 390 WESTERN AVE. AUGUSTA, ME, 04330	Food	FOD	\$609.89
6/5/2019	CUSHNOC BREWING CO. 243 WATER STREET AUGUSTA, ME, 04330	Food	FOD	\$35.16
6/6/2019	Staples 14 CROSSING WAY AUGUSTA, ME, 04330	Office Supplies	OFF	\$0.25
6/6/2019	Maple Hill Farm 11 Inn Road Hallowell, ME, 04347	Food	FOD	\$39.00
6/6/2019	Verizon Wireless 3 SOMERSET STREET PORTLAND, ME, 04101	Cell Phone	OFF	\$217.06
6/7/2019	COMFORT INN 281 Civic Center Drive Augusta, ME, 04330	Travel	TRV	\$109.00
6/12/2019	Unified Parking 496 CONGRESS STREET PORTLAND, ME, 04101	Travel	TRV	\$3.00



**SCHEDULE B-1  
OPERATING EXPENDITURES**

EXPENDITURE TYPES	
CNS Campaign consultants	CON Contribution to other candidate, party, committee
EQP Equipment (office machines, furniture, cell phones, etc.)	FND Fundraising events
FOD Food for campaign events, volunteers	LIT Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)
MHS Mail house (all services purchased)	OFF Office supplies, phone and internet services, rent and utilities
OTH Other (bank fees, entrance fees, small tools, wood, etc.)	PHO Phone banks, automated telephone calls
POL Polling and survey research	POS Postage for U.S. Mail and mail box fees
PRO Other professional services	PRT Print media ads only (newspapers, magazines, etc.)
RAD Radio ads, production costs	SAL Campaign workers' salaries and personnel costs
TRV Travel (fuel, mileage, lodging, etc.)	TVN TV or cable ads, production costs
WEB Online advertising, website design, maintenance, hosting, etc.	



DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
7/1/2019	FACEBOOK 1 HACKER WAY MENLO PARK, CA, 94025	Facebook	WEB	\$58.33
7/2/2019	NGP VAN Inc. 1101 15th Street, NW Suite 500 Washington, DC, 20005	Fundraising	FND	\$750.00
7/2/2019	GOOGLE 5 CAMBRIDGE CENTER CAMBRIDGE, MA, 02142	Online Hosting	WEB	\$78.00
7/2/2019	Staples 1131 UNION STREET BANGOR, ME, 04401	Office Supplies	OFF	\$7.39
7/3/2019	Payroll Management, Inc. 550 CENTER STREET AUBURN, ME, 04210	Salary and Personnel Costs	SAL	\$11,169.36
7/9/2019	Amato's 34 Western Avenue Augusta, ME, 04430	Food	FOD	\$27.36
7/12/2019	Cross Cafe State House Cross Building Augusta, ME, 04330	Food	FOD	\$281.34
7/12/2019	Rosemont 580 Brighton Avenue Portland, ME, 04102	Food	FOD	\$27.61
7/15/2019	Verizon Wireless 3 SOMERSET STREET PORTLAND, ME, 04101	Cell Phone	OFF	\$73.54
7/15/2019	Staples 244 Route 1 Falmouth, ME, 04105	Office Supplies	OFF	\$25.32
7/15/2019	DROPBOX.COM 185 BERRY STREET SAN FRANCISCO, CA, 94107	Online Hosting	WEB	\$11.99
7/16/2019	Cyber Copy 1006 FOREST AVENUE PORTLAND, ME, 04103	Office Supplies	OFF	\$7.39

## 21-A M.R.S. § 1012

Current with the First Regular Session, the First Special Session, Chapters 533-678 of the Second Regular Session of the 129th Maine Legislature.

### § 1012. Definitions

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

...

#### 2. **Contribution.** The term “contribution:”

##### A. Includes:

- (1) A gift, subscription, loan, advance or deposit of money or anything of value made for the purpose of influencing the nomination or election of any person to state, county or municipal office or for the purpose of liquidating any campaign deficit of a candidate, except that a loan of money to a candidate by a financial institution in this State made in accordance with applicable banking laws and regulations and in the ordinary course of business is not included;
- (2) A contract, promise or agreement, express or implied, whether or not legally enforceable, to make a contribution for such purposes;
- (3) Funds received by a candidate or a political committee that are transferred to the candidate or committee from another political committee or other source; and
- (4) The payment, by any person other than a candidate or a political committee, of compensation for the personal services of other persons that are provided to the candidate or political committee without charge for any such purpose; and

...

#### 3. **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 influencing the nomination or election of any person to state, county or municipal office, except that a loan of money to a candidate by a financial institution in this State made in accordance with applicable banking laws and regulations and in the ordinary course of business is not included;
- (2) A contract, promise or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure;
- (3) The transfer of funds by a candidate or a political committee to another candidate or political committee; and

(4) A payment or promise of payment to a person contracted with for the purpose of influencing any campaign as defined in section 1052, subsection 1; and

**B.** Does not include:

...

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

...

**4-A. Influence.** “Influence” means to promote, support, oppose or defeat.

...

## **§ 1014. Publication or distribution of political communications**

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**1. Authorized by candidate.** Whenever a person makes an expenditure to finance a communication expressly advocating the election or defeat of a clearly identified candidate through broadcasting stations, cable television systems, newspapers, magazines, campaign signs or other outdoor advertising facilities, publicly accessible sites on the Internet, direct mails or other similar types of general public political advertising or through flyers, handbills, bumper stickers and other nonperiodical publications, the communication, if authorized by a candidate, a candidate’s authorized political committee or their agents, must clearly and conspicuously state that the communication has been so authorized and must clearly state the name and address of the person who made or financed the expenditure for the communication. A 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 communication. If a 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 communication must be stated.

...

**2-A. Other communications.** Whenever a person makes an expenditure to finance a 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 through the media described in subsection 1, the communication must state the name and address of the person who made or financed the communication and a statement that the communication was or was not authorized by the candidate, except that a communication broadcast by radio is only required to state the city and state of the address of the person that financed the communication. The disclosure is not required if the communication was not made for the purpose of influencing the candidate’s nomination for election or election.

...



## § 1015. Limitations on contributions and expenditures

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...

**2. Committees; corporations; associations.** A political committee, political action committee, other committee, firm, partnership, corporation, association or organization may not make contributions to a candidate in support of the candidacy of one person aggregating more than \$1,500 in any election for a gubernatorial candidate, more than \$350 for a legislative candidate, more than \$500 for a candidate for municipal office and beginning January 1, 2012 more than \$750 in any election for any other candidate. Beginning December 1, 2010, contribution limits in accordance with this subsection are adjusted every 2 years based on the Consumer Price Index as reported by the United States Department of Labor, Bureau of Labor Statistics and rounded to the nearest amount divisible by \$25. The commission shall post the current contribution limit and the amount of the next adjustment and the date that it will become effective on its publicly accessible website and include this information with any publication to be used as a guide for candidates.

...

**5. Other contributions and expenditures.** Any expenditure made by any person in cooperation, consultation or concert with, or at the request or suggestion of, a candidate, a candidate's political committee or their agents is considered to be a contribution to that candidate.

The financing by any person of the dissemination, distribution or republication, in whole or in part, of any broadcast or any written or other campaign materials prepared by the candidate, the candidate's political committee or committees or their authorized agents is considered to be a contribution to that candidate.

...

## § 1060. Content of reports

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...

**4. Itemized expenditures.** An itemization of each expenditure made to initiate or influence any campaign, including the date, payee and purpose of the expenditure; the name of each candidate, campaign, political committee, political action committee or party committee supported or opposed; and each referendum or initiated petition supported or opposed by the expenditure. If expenditures were made to a person described in section 1012, subsection 3, paragraph A, subparagraph (4), the report must contain the name of the person; the amount spent by that person on behalf of the candidate, campaign, political committee, political action committee, party committee, referendum or initiated petition, including, but not limited to, expenditures made during the signature gathering phase; the reason for the expenditure; and the date of the expenditure. The commission may specify the categories of expenditures that are to be reported to enable the commission to closely monitor the activities of political action committees;

...