



# RESPONSE TO PUBLIC COMMENTS ON RULES FOR EARNED PAID LEAVE

Maine Department of Labor,  
Bureau of Labor Standards

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## Introduction

On March 25<sup>th</sup>, 2020, proposed Rules were published and required notice was posted announcing that the comment period would remain open until April 27<sup>th</sup> and that a public hearing would be held on the 15<sup>th</sup> of that month. Subsequently, in part due to the COVID pandemic and resulting public health crisis, further announcements were published stating that the hearing would be held by remote technology on the scheduled date and the comment period was extended to May 27<sup>th</sup>.

Within the comment period the Department received a total of 164 comments from 158 individuals. Twenty -one of the comments were delivered verbally during the hearing and the remainder were submitted in writing via mail. Most of those comments addressed about a dozen categories of subjects, and a large number of similar comments were received on a handful of those subjects. Below is a summary of comments grouped into those various common categories.

## Comments and Responses, by subject area

### Implementation Date

Sixty-eight of the commenters referenced the effective date of the new EPL law, in most cases advocating that it be implemented earlier than statutorily required on January 1, 2021.

- Sixty-one of the commenters (Sources 001, 002, 009, 011, 012, 014, 016, 038, 045, 046, 047, 048 and 049-097) suggested an earlier start date. Many called for implementation of the statute to begin immediately after the close of the rulemaking comment period.
- Six of the commenters (Sources 015, 017, 018, 041, 042, 043) expressed a preference starting as originally planned and certainly no earlier, most including concerns around budgeting and having time to plan and put in place tracking mechanisms.
- One commenter (Source 003) suggested implementation be delayed because of hardship with accommodating the added pandemic issues.

**Response:** The statute clearly defines the starting date and it is beyond the purview of the rulemaking process to change that.

### Section I: Application

Source 43 stated, "These rules apply to employers that employ more than 10 employees... The rules should specify full or part time employees or full-time equivalent."

**Response:** Section II.E. specifies that a covered employee includes an employee who works fulltime, part time or per diem.

### Section II: Definitions

There were numerous calls for adding or changing various definitions:

Undue Hardship

Commenters with diverse views (Sources 037, 042, 043, 047) requested further definition of "undue hardship."

**Response:** The Department believes that undue hardship is defined adequately in proposed Rule section V.C. and that that definition is consistent with other statutes in Chapter 7 such as § 850. No change.

### Seasonal Employee

Some confusion was expressed (Sources 003, 032, 034) regarding the definition of “seasonal” employees.

**Response:** Seasonal employment is defined for purposes of this statute within 26 MRS §637 by reference to §1251 of the same Title. No change.

### Sudden Necessity

Further clarity regarding “emergency” (Sources 046 and 047), “sudden necessity” (Sources 046 and 047), etc.

**Response:** The Department believes that emergency and sudden necessity are defined adequately in proposed Rule section II.G. No change.

### Family

Two commenters suggested that the term “family” should be defined. (Sources 023, 046 and 047).

**Response:** “Family” is not in the law and so is not defined in the rules.

### II.B: Base Rate of Pay

Four comments addressed this section, two on each side of the issue.

- Two (Sources 031 and 033) objected to the inclusion of bonuses and commissions, with one of them (031) adding some employees might time their leave in order to manipulate their pay rate.
- On the other side, both commenters (Sources 046 and 047) expressed concerns that base rates for certain occupations (such as tipped workers or those exempted from overtime protections) and salaried employees would be lower or unclear. One of these commenters (Source 046) worried about manipulation by employers and further stated that the regulations should make clear that no worker should receive less than the full minimum wage. Both also recommended applying language like that used to calculate unemployment or Workers’ Compensation benefits.

**Response:** The statute states “An employee while taking earned leave must be paid at least the same base rate of pay that the employee received immediately prior to taking earned leave and must receive the same benefits as those provided under established policies of the employer pertaining to other types of paid leave.”

The Department recognizes the concerns reflected in comments received from various perspectives. However, the language in the statute regarding the rate paid an employee while taking earned leave is clear and unambiguous. The proposed language in Rule section II.B is consistent with language in other statutes within Chapter 7 establishing rates of pay. The section will remain as proposed.

### II.E: Covered Employee

Source 025 stated, “I implore the Department of Labor to consider making certain government, municipal and school entities exempt from these rules when Negotiated Agreements are in effect that already address the paid time off issue.” Source 27 also questioned the coverage of school personnel, especially per diem, substitutes, adjuncts, adult ed instructors, etc.

**Response:** The Earned Paid Leave Law specifies that employment for purposes of unpaid leave has the same meaning as employment in the Employment Security Act, 26 M.R.S. § 1043(11). The Department of Labor does not have legal authority to exempt groups of workers or employers who are covered by the law. Only the legislature may make changes as to the coverage of the law.

Source 46 stated, “...it seems non-citizens may not be covered...”

**Response:** The Earned Paid Leave Law specifies that employment for purposes of unpaid leave has the

same meaning as employment in the Employment Security Act, 26 M.R.S. § 1043(11). The Employment Security Act does not exclude non-citizens from coverage. Non-citizens who are legally authorized to work in the United States are covered by the Employment Security Act, and therefore, are also covered by the Earned Paid Leave Law. See 26 M.R.S. § 1192(11).

Source 46 stated, "...the rules should specify that agricultural workers are included and spell out any limitations."

**Response:** The Earned Paid Leave Law specifies that individuals covered by the Employment Security Act are eligible for earned paid leave. Specifically, 26 M.R.S. § 1043(11)(A-2) sets forth the circumstances in which employers of agricultural labors must pay unemployment taxes, including when the employer pays wages of more than \$20,000 for agricultural labor or when 10 or more individuals are employed in agricultural labor during 20 calendar weeks. The same coverage extends to agricultural workers under the Earned Paid Leave law. Please note that "agricultural labor," is defined by 26 M.R.S. § 1043(1).

Source 46 stated, "It appears domestic workers are covered. For domestic workers in private homes a certain small amount must have been paid in the past year by the employer. The general coverage rule and exception for these workers should also be specified."

**Response:** The Earned Paid Leave Law specifies that individuals covered by the Employment Security Act are eligible for earned paid leave. Specifically, 26 M.R.S. § 1043(11)(A-3) specifies that domestic service in a private home, local college club or local chapter of a college fraternity or sorority performed for a person who paid wages of more than \$1,000 in a calendar year is employed covered by the Employment Security Act. Such domestic service is therefore also covered by the Earned Paid Leave Law.

## II. K: Hours Worked—40-hour Presumption for Salaried Workers

Three commenters (Sources 010, 018, 036) objected to the provision in Rule for a presumption regarding hours worked by salaried employees in the absence of other records.

### **Response:**

After a thorough review of the comments submitted, the department has decided there will be no change to this section in the rules. Employers are not required to keep daily time records on salaried exempt employees because these employees are paid a fixed amount regardless of the hours worked. Therefore, in the absence of any other record, it is presumed that a salary exempt employee works 40 hours per week. Employers can elect to track the hours of salary exempt employees and we would encourage that. If an employer is tracking the hours worked then the employee will accrue one hour of earned paid leave for every 40 hours actually worked, up to 40 hours in one year of employment.

## III. Accrual

### III.B. Waiting Period

In addition to those calling for immediate implementation of the statute, there were 4 additional comments (Sources 038, 039, 045 and 047) and one question (Source 028) about the 120-day waiting period allowed before the use of the earned paid leave is required to be permitted by the employer. The comments included specific concerns about the 120-day waiting period for an individual worker's access to leave benefits which is contained in statute as well as the proposed Rule. Source 038 simply asked that the waiting period be reduced or eliminated. Source 039 expressed concern that new and seasonal employees subject to probationary periods under company policies might be denied earned paid leave otherwise required by the statute.

Two commenters (Sources 038 and 047) asserted that the waiting period was intended to only apply to employees hired after the effective date of January 1, 2021, rather than to all "newly-eligible" employees

and suggested that the apparent interpretation of the statute in the Rule was incorrect. One (Source 047) further offered specific language to amend the proposed Rule to conform with this interpretation of statute.

**Response:** The language of the law is clear with respect to the accrual of leave and cannot be changed. We agree with the interpretation that the 120 days of employment named in the statute section 3 may be considered to have occurred during a one-year period beginning before the statute goes into effect on January 1, 2021, for employees already employed on that date. We believe that this interpretation is contained within current language of the statute and therefore does not require further clarification in Rule.

### III.D: Carry-Over

There were 5 comments on this provision enabling employees to retain accrued leave from one year of employment to the next. Three commenters (Sources 018, 036 and 044) questioned the statutory basis of the provision in its entirety. Another (Source 046) supported the provision and further asserted that such carry-over should not be limited as it is in the Rule to forty hours, also stating that such limitations are not in the statute. Source 031 had questions on the concept that will be illustrated in the FAQs.

**Response:**

The Department reviewed the language in section III.D. of the proposed Rule in the light of the comments received and determined that the language clearly and accurately reflects the apparent intent of the statute, and that it provides necessary and adequate guidance to employers, employees and department staff seeking to implement the statute. In addition, the Department responded to a concern expressed in listening sessions and elsewhere that in order to avoid losing their accrued leave employees might be motivated to use most or all of it at the end of each one-year period. This would make it unavailable if needed subsequently while creating a potential scheduling problem for employers, neither of which results the Department believes was intended by the statute.

The section will remain as proposed.

### III.E: Payout of Unused Leave

Six commenters addressed the Rule section on the payment of earned leave upon separation. Three (Sources 018, 036 and 042) against, two (Sources 020 and 024) questioning aspects of it and one (Source 046) in favor of it. One (Source 042) requested that the complete language be placed in the EPL Rule rather than a reference to another statute; another (Source 020) wondered whether leave would be required to be paid out upon termination for cause (for example if employee is terminated because of theft). Still another commenter (Source 046) stated that it "should be required that unused sick pay of up to 80 accrued hours is paid out when an employee leaves work."

**Response:**

After a thorough review of the comments submitted, the department has decided there will be no change to this section in the rules. Since the law doesn't directly address what happens to any unused balance of earned paid leave at the time of separation, the department rules will require an employer to honor their own written policy or established practice in this area, including any regarding payment upon termination for cause. This is consistent with the interpretation used when enforcing Maine's Cessation of Employment law (title 26, §626) as it specifically relates to unused vacation time.

Since Maine's Earned Paid Leave law does not specifically address sick pay and the accrual of time up to 80 hours, these rules cannot require an employer to pay an employee up to 80 hours of sick pay at the time of separation.

### III.F: Return to Work

One commenter (Source 018) objected to the provision that an employee leaving and returning to work within a year is entitled to restoration of their unused balance of earned paid leave, stating emphatically that the statute includes no authority for such a Rule.

**Response:**

The Department believes that the statute is clear in its intent that an employee will remain eligible to accrue the benefit during a one-year period and to use the benefit if employed for 120 days during any one-year period regardless of the continuity or discontinuity of active employment with an employer during that period. For purposes of clarifying exactly that interpretation as opposed to any others, the rule section will remain as proposed.

### III.G: Multi-Employer Agreements

Sixty-four commenters (Sources 007, 046, 048, 098-158) expressed appreciation for defining employers to include multi-employer bargaining units in the construction industry. There were no objections in any of the comments.

**Response:**

The Department appreciates the favorable comments and notes that there are no objections. This section will remain as proposed.

## IV: Greater Benefits and Exception

### Greater Benefits and Existing PTO Policies

Several comments addressed the interaction of the new law with existing or prospective paid leave policies providing benefits equal to or greater than those required by the statute. In some cases, the concern was whether employers' current sick leave, vacation leave and other paid time off policies will satisfy the requirements of the Rule.

Sixty-one commenters (Sources 098-158) said "please make it clear that union members can collectively bargain for a greater benefit of leave than this law allows." Source 046 sought clarification regarding "the ongoing obligation of the employer to negotiate" with a union over employee benefits and was troubled by the language in section 6 of the statute itself apparently allowing an employer acting alone to provide a greater benefit in excess of the minimum required by the Act without reference to collective bargaining. Three of the commenters (Sources 005, 023, 037) were businesses expressing concerns with compatibility of their existing leave with that required in the new law. One employer (Source 037) wrote: "...the rules fail to address how the law impacts employers with existing PTO or other paid leave policies which are more generous than the leave provided under the law. Specifically, how does the law impact leave policies that lump together sick and vacation time?"

**Response:**

After reviewing comments regarding subsection 6 of the statute, the Department will refrain from adding language clarifying that employers may provide benefits greater than those required by 26 MRS §637 in the belief that the language of the statute is adequately clear on that matter. However, recognizing that under circumstances involving collectively bargained benefits such leave policies may not be solely determined by the employer, the Department has amended and retitled Rule section IV to clarify its position regarding those circumstances as follows:



#### Section IV: Greater Benefits and Exception

- A. Nothing in this chapter may be construed to affect an employer's obligation to comply with any collective bargaining agreement or employee benefit plan that provides greater earned paid leave rights to employees than the rights provided by 26 MRS §637.
- B. 26 MRS §637 does not apply to an employee covered by a collective bargaining agreement during the period between January 1, 2021 and the expiration of the agreement.

## V: Notice and Use of Leave

### V.A: Reasonable Notice—Four Weeks' Notice Limit (Written notice, documentation)

There were 120 comments on the rule allowing employers to require four weeks' notice for non-emergency leave. A total of 117 commenters (S013, S016, S039, S045-158) expressed that the limit was excessive and onerous. One recommended reducing the allowed number of weeks required for notice to two and another to one week. Only one comment (Source 044) conveyed the opposite opinion that four weeks' notice might be inadequate; two others (Sources 018, 036) called for an employer to be explicitly allowed to require written notice.

S042 asked Whether an employer may request documentation to substantiate an employee's need for leave.

S037 stated that "the rules fail to address whether pool employees can use sick days on days they proactively pick up."

#### **Response:**

After a thorough review of the comments submitted, the department has decided there will be no change to this section in the rules.

The law provides for reasonable notice and specifically states that the use of leave must be scheduled to prevent undue hardship on the employer as reasonably determined by the employer. In this case, it is not unreasonable for an employer to require an employee to provide up to 4 weeks advance notice if the employee is going to use their earned paid leave for any reason other than an emergency, illness, or sudden necessity. This represents the maximum amount of time that can be required for discretionary time off. The rules do not prohibit an employer from requiring a shorter notice if they so choose. In most cases reasonable notice could be required in writing, which would include but not be limited to electronic format such as email or text. If an employee is going to use earned paid leave for an emergency, illness, or sudden necessity, then the reasonable notice would be as soon as practicable based on the facts of that specific circumstance.

The employer can't require documentation to substantiate the employee's need for leave as doing so would restrict the discretion of the workers to use paid leave time off as needed within the parameters of the law.

If emergency, illness or other sudden necessity arises, the right of "pool employees" to use earned paid leave is the same as for any other eligible employee.

### V.D: One-hour Increment

Six commenters provided input on the one-hour increment rule establishing one hour as the minimum allowable increment for leave. Two Sources (042 and 043) simply indicated it may be a problem for some employers. Source 043 further suggested two hours might be preferable. Another (005) questioned its

use for per diem full day substitute employees. Of three somewhat more negative comments (Sources 018, 036 and 044) from employers and their representatives regarding the section, one (036) objected to the inclusion of this or any minimum, while another (044) stated that “a minimum entitlement of ‘at least one hour’ is too little and will lead to disruptions as well as to undue complications in tracking leave.”

**Response:**

After a thorough review of the comments submitted, the department has decided there will be no change to this section in the rules. The intent of the legislation was to provide workers with time they could use for emergency purposes and not lose pay. Requiring the worker to take more time off than necessary would hinder employee’s ability to use the leave. Throughout the process, workers and employers asked the Department to define an increment of the earned paid leave in order to be transparent and allow for a level of planning. The Department’s choice gives flexibility to workers to take the time necessary without sacrificing additional hours they do not want to use.

## Other Issues Raised

### Retaliation Concern

A large number of comments expressed concern regarding the absence of protections for employees against various forms of discipline including discharge for requesting or exercising their rights to earned paid leave. There were 125 such commenters (Sources 001, 002, 006, 008, 011, 012, 013, 016, 038, 039, 040, 045-158) varying from the recognition that the statute included no such protection and encouraging the Department to insert one into the Rule regardless, to a recounting of legislative discussion on the subject (Source 047). One commenter (048) noted that “This law needs teeth and sharp ones at that” to prevent retaliation.

**Response:**

MDOL will enforce against violations of the law. Consistent with its enforcement of other wage and hour laws, MDOL will investigate complaints by workers who allege that an employer has not allowed them to accrue earned paid leave and/or to take earned paid leave in accordance with the parameters of the law. MDOL will make determinations on a case-by-case basis as to whether the particular situation is a violation of the Earned Paid Leave Act and will take appropriate enforcement action.

The Earned Paid Leave Act does not contain an explicit prohibition against retaliation; thus, the Rule may not add a substantive component that does not exist in the Act. Depending upon the specific situation, workers who believe they have been retaliated against for reporting violations of the Earned Paid Leave Act to their employers may have protections under the Whistleblowers’ Protection Act (WPA), 26 M.R.S. §§ 831-840. In those cases, workers may file a complaint with the Maine Human Rights Commission for such alleged retaliation.

### Notices/Posters (26 MRS section 42-B)

Forty-nine commenters (Sources 049-097) suggested that employers should be required to:

- a) “give workers notice of their rights to paid leave” under the statute, and
- b) “inform their workers of their policies of how to request paid leave.”

Another commenter (008) said during the hearing that “employers should be required to prominently post their employees’ rights to paid leave under this law” as well as to provide information about where workers can get their questions about it answered. We note that while the proposed rules do not include such requirements, the statute itself does require notice of employees’ rights via a poster requirement.

**Response:**

The requirements already exist in statute (§ 42-B.1.G) that the Bureau “shall produce and furnish to employers posters or notices in electronic or printed form outlining state labor laws applicable to those employers and regulating...earned paid leave” and that “An employer subject to the laws outlined in the poster or notice issued by the bureau ... shall post and keep posted in a place accessible to the employer's employees a copy of the poster or notice furnished by the bureau and so is unnecessary in Rule. A requirement that employers provide to their employees further information about the statute does not exist in the statute and so cannot be included in the Rule. The Rule will remain as proposed with respect to notice to be posted by an employer.

## Appendix A: Commenter Key

| <b>Source</b> | <b>Person/City</b>                        | <b>Representing</b>                                  |
|---------------|---|--|
| S001          | Roxanne Petrovich / Woodstock             |  |
| S002          | Alexander Petrovich / Woodstock           |  |
| S003          | Katy Kelley / Wells                       | Lafayette Properties                                 |
| S004          | Todd Ricker / Portland                    | Maine State Nurses Association                       |
| S005          | Janet Kelly / Bangor                      | Husson University                                    |
| S006          | Patrick Carleton / Chesterville           | United Steel Workers Local Unions                    |
| S007          | Jason Shedlock / South Portland           | Maine State Building and Construction Trades Council |
| S008          | Steve Tumer / Mechanic Falls              |  |
| S009          | Leighton Gillis / Westbrook               |  |
| S010          | Kim Yesis / Belfast                       |  |
| S011          | Maria Woodbury / Westbrook                | Southern Maine Workers' Center                       |
| S012          | Paige Nygaard / Portland                  |  |
| S013          | Bobby Burr / Scarborough                  | Local 4, Operating Engineers                         |
| S014          | Arlo Hennessey / Portland                 | Southern Maine Workers' Center                       |
| S015          | Roger Hooper / Lyman                      | York County Fire & Rescue                            |
| S016          | Kathy Kilrain del Rio / Portland          | Maine Equal Justice                                  |
| S017          | Greg Dugal / Lincolnville                 | Hospitality Maine                                    |
| S018          | Peter Gore / Harpswell                    | Maine State Chamber of Commerce                      |
| S019          | Lisa M Motto / Bucksport                  |  |
| S020          | James Damon / Augusta                     |  |
| S021          | Barbara Mahoney / Brunswick               |  |
| S022          | J Withee / Hampden                        |  |
| S023          | Cheryl Patterson / Holden Maine           | Husson College                                       |
| S024          | Belinda Lawrence                          | Business   |
| S025          | Sherry Moody, Business Manager / Rockland | Mid-Coast School of Technology                       |
| S026          | Michael Cavaretta / York                  | Business Owner                                       |

| <b>Source</b> | <b>Person/City</b>   | <b>Representing</b>                                   |
|---------------|--|---|
| S027          | Doris A. Vermette, (2 submissions)<br>Payroll Clerk/Bookkeeper   | M.S.A.D. #13/RSU 83 Bingham                           |
| S028          | Dean Homstead  | Bud's Shop 'n Save Pittsfield                         |
| S029          | Kim Robitaille   | Rose's Commercial Cleaning                            |
| S030          | C.J. Betit, Director of<br>Collective Bargaining and<br>Research | Maine Education Association                           |
| S031          | Dawn Hasler, SPHR<br>Vice President of Human<br>Resources        | Elmet Technologies LLC                                |
| S032          | France Beaulieu<br>Human Resource Manager                        | Town of Old Orchard Beach                             |
| S033          | Carrie Meo, CEO  | Anthony John's Day Spa, Salon & Boutique              |
| S034          | Maryellen Bourbon, Payroll<br>Manager                            | MSAD #60 N. Berwick                                   |
| S035          | Steven Bailey, Executive<br>Director                             | Maine School Management Association                   |
| S036          | Patrick Strauch, Executive<br>Director                           | Maine Forest Products Council                         |
| S037          | Megan Randlett, Esq.<br>Corporate Counsel<br>Legal Department    | Northern Light Health<br>Brewer                       |
| S038          | James Myall, Policy Analyst                                      | Maine Center for Economic Policy<br>Augusta           |
| S039          | Mike Higgins   | United Steelworkers Dist. 4<br>Augusta                |
| S040          | Anne Macri & Jeff McCabe   | Maine State Employees' Association                    |
| S041          | Rick Holden,<br>President  | Maine Staffing Association                            |
| S042          | Curtis Picard, CAE,<br>President & CEO                           | Retail Association of Maine<br>Augusta                |
| S043          | Christine Cummings,<br>Executive Director                        | Maine Grocers & Food Producers Association<br>Augusta |
| S044          | David R. Clough,<br>State Director in Maine                      | National Federation of Independent Business           |
| S045          | Elizabeth Trice / Portland                                       |   |
| S046          | Adam Goode,<br>Legislative and Political<br>Director / Augusta   | Maine AFL-CIO<br>Augusta                              |

| <b>Source</b> | <b>Person/City</b>                   | <b>Representing</b>  |
|---------------|--------------------------------------|--|
| S047          | Jeffrey Neil Young, Esq.             | Johnson, Webbert & Young, LLP, executive Board member of the National Employment Lawyers Association, and vice-president of the Maine Employment Lawyers Association Augusta |
| S048          | Grant Provost, Business Agent        | Ironworkers Local 7  |
| S049          | Catherine Newell / Yarmouth          |  |
| S050          | Matthew Bear-Fowler /<br>Hallowell   |  |
| S051          | William Norelus / Lewiston           |  |
| S052          | Peter Robbins / Portland             |  |
| S053          | Jean Thompson / Kennebunk            |  |
| S054          | Carol Boyd / Kennebunk               |  |
| S055          | David Thibodeau / Portland           |  |
| S056          | Elizabeth Hill / Brooksville         |  |
| S057          | Joan Yates / Westbrook               |  |
| S058          | Brendan Mcquade / Portland           |  |
| S059          | Elizabeth Phipps / Standish          |  |
| S060          | Deborah Nicklas / Falmouth           |  |
| S061          | Jamie Corbett / Machias              |  |
| S062          | Terri Jean Wilkinson /<br>Waterville |  |
| S063          | Lisa Mishou / Belfast                |  |
| S064          | Mark Peterson / Belfast              |  |
| S065          | Sandrea Kornblum / Portland          |  |
| S066          | Icisle / Belfast                     |  |
| S067          | Caro Barschow / Cambridge<br>MA      |  |
| S068          | Lucy Mallar / Dover-Foxcroft         |  |
| S069          | Tori Lambert / Portland              |  |
| S070          | Megan Hartman / Brunswick            |  |

| <b>Source</b> | <b>Person/City</b>                  | <b>Representing</b> |
|---------------|-------------------------------------|---------------------|
| S071          | David Strohl / Bowerbank            |                     |
| S072          | Wanda Webber / Brunswick            |                     |
| S073          | Carol Lane / Auburn                 |                     |
| S074          | David Merrill / Portland            |                     |
| S075          | Jarrett Cloud / Morris Plains<br>NJ |                     |
| S076          | Devon Grayson-Wallace /<br>Portland |                     |
| S077          | Glenn Sutton / Freeport             |                     |
| S078          | Nancy Earle / Bangor                |                     |
| S079          | Joan M. Russo / Scarborough         |                     |
| S080          | Thomas E. Clouse /<br>Scarborough   |                     |
| S081          | Ann Schaer / Waldoboro              |                     |
| S082          | Tom Yaroschuk / Stonington          |                     |
| S083          | Shirley Chace / Brunswick           |                     |
| S084          | John Bernard / South Portland       |                     |
| S085          | Elizabeth Davidson / Portland       |                     |
| S086          | P Pierce / Saco                     |                     |
| S087          | Bob Sipe / Auburn                   |                     |
| S088          | Priscilla Skerry / Portland         |                     |
| S089          | Doug Wescott / Winslow              |                     |
| S090          | Linda Tisdale / Surry               |                     |
| S091          | Ron Harrity / Portland              |                     |
| S092          | Ellen Rice / Brunswick              |                     |
| S093          | Timothy Waring / Orono              |                     |
| S094          | George Muller / South<br>Berwick    |                     |
| S095          | Sarah Harriman / Bath               |                     |
| S096          | Jean Hardy / Belfast                |                     |

| <b>Source</b> | <b>Person/City</b>                | <b>Representing</b> |
|---------------|-----------------------------------|---------------------|
| S097          | Susan Drucker / Bowdoinham        |                     |
| S098          | Matthew Frye / Madison            |                     |
| S099          | Myles Gonzalez / Glenburn         |                     |
| S100          | Scott Cuddy / Winterport          |                     |
| S101          | Robert Everest / Westbrook        |                     |
| S102          | Craig Jordan / Chesterville       |                     |
| S103          | Anthony Sirois / Monmouth         |                     |
| S104          | Jennifer Mckenna / Augusta        |                     |
| S105          | Kyle Johnson / Gardiner           |                     |
| S106          | Mary Cates / Skowhegan            |                     |
| S107          | Derek Proctor / Troy              |                     |
| S108          | Thomas Harvey / Pembroke          |                     |
| S109          | Sandra Durrell / Lewiston         |                     |
| S110          | Tyler Faulkner / Newport          |                     |
| S111          | Greg Liring / South Portland      |                     |
| S112          | Pasquale Napolitano /<br>Portland |                     |
| S113          | Shianne Valenzuela / Augusta      |                     |
| S114          | Lee Whitaker / Windsor            |                     |
| S115          | Russell Long / Bath               |                     |
| S116          | Yvonne Burris / Anson             |                     |
| S117          | Eric Fish / Bangor                |                     |
| S118          | Clarence Gould / Cornville        |                     |
| S119          | Jason Chabot / Oakland            |                     |
| S120          | Joshua Dutch / Gardiner           |                     |
| S121          | Michael Washburn / Madison        |                     |
| S122          | Andrew Lugdon / Corinth           |                     |



| <b>Source</b> | <b>Person/City</b>                     | <b>Representing</b> |
|---------------|--|---------------------|
| S123          | Daniel Giguere / Augusta               |                     |
| S124          | Rodger Bartlett / Anson                |                     |
| S125          | Paul Hilenski / New Portland           |                     |
| S126          | Kristina Sabin / Sumner                |                     |
| S127          | Mike Larrabee / Windham                |                     |
| S128          | Tim Beckey / Greene                    |                     |
| S129          | Marc Cravinho / Lee,NH                 |                     |
| S130          | Gary Morin / Lewiston                  |                     |
| S131          | Tony Pierson / Steep Falls             |                     |
| S132          | Andrew Violette / Oakland              |                     |
| S133          | Matthew Butler / Columbia              |                     |
| S134          | William Zahn / Sanford                 |                     |
| S135          | Cary Wright / Leeds                    |                     |
| S136          | Denis Lehouillier / Scarborough        |                     |
| S137          | bruce fletcher / ellenton, FL          |                     |
| S138          | Michele Burch / New sharon             |                     |
| S139          | Cory Mains / Casco                     |                     |
| S140          | Robert Pettengill / Lyman              |                     |
| S141          | Alan Kenney / Northport                |                     |
| S142          | John Rastrom / Street (?)              |                     |
| S143          | Emile Woodruff / Fairfield             |                     |
| S144          | Joe Mulkern / Portland                 |                     |
| S145          | Jonathan Potter / Cranberry Twnshp, PA |                     |
| S146          | John Connors / Portland                |                     |
| S147          | Chasellor Burris / Anson               |                     |

| <b>Source</b> | <b>Person/City</b>               | <b>Representing</b> |
|---------------|----------------------------------|---------------------|
| S148          | Alexander Lee / Owls Head        |                     |
| S149          | Marc Shorette / Bradley          |                     |
| S150          | Benjamin Lemieux / Winslow       |                     |
| S151          | Charles Fraser / Fairfield       |                     |
| S152          | Robert Murphy / Mount<br>Desert  |                     |
| S153          | Travis Wood / Skowhegan          |                     |
| S154          | Nick Paquet / Benton             |                     |
| S155          | Robert Burr / Scarborough        |                     |
| S156          | John Reynolds / Oakland          |                     |
| S157          | John Napolitano / N.<br>Yarmouth |                     |
| S158          | Whitney Parrish / Hallowell      |                     |