

December 17, 2019

Sent via email to: jonathan.wayne@maine.gov

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

RE: Strimling for Mayor Campaign Opposition to Request for Waiver of Late – Filing Penalty by Unite Portland

Dear Mr. Wayne:

The Ethan Strimling for Mayor Campaign writes this letter in response to the December 11, 2019 Memo from Michael Dunn, Esq. of the Ethics Commission re Request for Waiver of Late-Filing Penalty by United Portland and the December 13, 2019 Letter from James T. Kilbreth, Esq. to the Ethics Commission re Portland Mayoral Complaint.

The Unite Portland PAC was created for one purpose – to raise and spend nearly \$50,000 to expressly advocate for the defeat of Ethan Strimling in the 2019 Portland mayoral election.¹ UP was created to make independent expenditures and that is all. For UP to now claim that until late October, their principal officers did not understand they had to file independent expenditure reports does not pass the straight face test.

More money is spent on the Portland municipal election than on any other municipal election in Maine and nearly all races for the State House. It is crucial that the Ethics Commission levy a serious penalty in this case to set an example for future campaigns in our biggest city that it is not okay to run an express advocacy campaign directly against a candidate and fail to disclose what they are spending money on and who they are paying to do it.

Unite Portland’s Fine Should be Increased Based on Ethics Commission Statute and Regulations

A. Calculation of the Penalty

¹ The PAC Registration states: “If the committee is formed to influence the election of a single candidate, the name of the candidate must be listed.” Dory Waxman listed one candidate – “STRIMLING FOR MAYOR” – and checked the “oppose” box. EXHIBIT A.

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We believe that the Ethics Commission Staff recommendation of only a \$2,000 penalty in total against Unite Portland, does not reflect the gravity of the violation and the experience of the involved parties. As a result, we calculate the Unite Portland's penalty to be at least \$28,992², and thus, we believe that Unite Portland's penalty should be dramatically enhanced.

Section 1020-A, sub-section 4-A uses the following formula to calculate late campaign finance penalties:

4-A. Basis for penalties. The penalty for late filing of a report required under this subchapter is a percentage of the total contributions or expenditures for the filing period, whichever is greater, multiplied by the number of calendar days late, as follows:

- A. For the first violation, 2%;
- B. For the 2nd violation, 4%; and
- C. For the 3rd and subsequent violations, 6%.

We agree that the base calculation for the September 1st Independent Expenditure should be the \$5,000 maximum and calculated using the multiplier (2%) for a "first violation."³ However, the base calculation for the September 26th IE should be increased to \$4,664, as this clearly was the second violation, which requires the multiplier (4%) for the "2nd violation."⁴ The Ethics Commission staff, in its December 11th letter maintains that the two violations should be treated the same, "as both violations arise from the same nexus of information." However, we argue that these two violations were separate and distinct, as the two expenditures reported were made nearly a month apart (September 1st compared with September 26th), and thus the Commission should use the 4% multiplier for the second violation.

Additionally, although section 1020-A limits the maximum penalty per expenditure to be \$5,000, section 1004-C of Title 21-A allows the Commission to significantly increase the penalty when violations occur so close to an Election. Specifically,

§1004-C. Enhanced penalties for violations with aggravating circumstances

Notwithstanding any maximum penalty otherwise set forth in this chapter, when assessing a penalty or monetary sanction, the commission may double the authorized penalty or monetary sanction for a violation occurring less than 28 days prior to an election day and may triple the authorized penalty or monetary sanction for a violation occurring less than 14 days prior to an election day.

² The Strimling Campaign argued that another \$4,000 September 1st IE should have been reported on September 6th. The Campaign also argued that the September 26th IE was 26 days late (using the amended October 24th report), rather than 22 days late in the Ethics Commission calculation (using the October 21st original IE report in the Ethics Commission calculation). However, this IE was actually filed with the Portland City Clerk on October 23rd, so we will use this date, which would make this IE 25 days late. EXHIBIT B.

³ Pursuant to §1020-A, a penalty for a late filed expenditure would be: $\$5,979.84 \times 2\%$ (first violation) $\times 48$ (number of days late) = \$5,740.64. EXHIBIT C (October 24th IE filing by UP).

⁴ $\$4,664 \times 4\%$ (second violation) $\times 25$ (number of days late) = \$4,664.

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As the September 26th IE was originally reported to the City of Portland on October 23rd (within 14 days of the election) then that penalty of \$4,664 should be *tripled* to \$13,992. As the September 1st IE was not reported until October 24th (also within 14 days of the election), then that base penalty of \$5,000 should be *tripled* to \$15,000. Thus, the total penalty should be $\$13,992 + \$15,000 = \$28,992$.

B. Aggravating Circumstances Exist to Support these Penalties and No “Mitigating Circumstances” exist to Lower these Penalties.

There has been a clear pattern demonstrated by UP to deliberately conceal their activities and participants from the public. As a result, the activities of this PAC remained in the dark for the public for extensive periods of time immediately before an election, which satisfies the basis of “aggravating circumstances.” The parties involved in the PAC had extensive experience in campaigns, and thus there are no sufficient circumstances to “mitigate” any penalty.

i. UP failed to disclose its IE activities for over a month.

UP makes several ineffective arguments in its November 18th and December 13th letters to the Ethics Commission that its penalty should be mitigated. First, UP argues that there that was no “failure to disclose” as “all the information that would have been contained in such [IE] filing was in fact disclosed in UnitePortland’s October 7 quarterly report.” Taking this to be true, then there still would have been a failure to disclose the information of the IE for over a month after this information was due. Additionally, UP was required to amend this quarterly report because it failed to include the sufficient detail required in these reports.

ii. UP failed to respond “promptly.”

Second, UP argues that “once UnitePortland became aware of the need to file IE reports, it promptly filed them and worked closely with Commission staff to be sure they were correct.” The Strimling campaign filed its first complaint with the City of Portland on October 8th regarding the failure of UP to file IE reports (among other violations) (See EXHIBIT D– October 8th Complaint to City Clerk); however, UP did not file its first IE report until October 23rd (EXHIBIT B), over 2 weeks later, which then needed to be amended on October 24th to include sufficient detail. See EXHIBIT. As a PAC formed for the sole purpose of making independent expenditures against Ethan Strimling, UP did not file an IE report until within 2 weeks of the Election, despite making nearly \$50,000 worth of expenditures during the course of the campaign.

iii. UP participants have tremendous political campaign experience.

Third, UP’s Principal Officer, Treasurer, Consultant, and Contributors possessed sufficient experience to comply with the most basic of requirements in a candidate campaign – the filing of Independent Expenditure reports.

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Sub-section 2 of Section 1020-A of Title 21-A states in part:

The commission may waive a penalty in whole or in part if the commission determines that the penalty is disproportionate to the size of the candidate's campaign, the level of experience of the candidate, treasurer or campaign staff or the harm suffered by the public from the late disclosure. The commission may waive the penalty in whole or in part if the commission determines the failure to file a timely report was due to mitigating circumstances. For purposes of this section, "mitigating circumstances" means:

A. A valid emergency determined by the commission, in the interest of the sound administration of justice, to warrant the waiver of the penalty in whole or in part;

B. An error by the commission staff;

C. Failure to receive notice of the filing deadline; or

D. Other circumstances determined by the commission that warrant mitigation of the penalty, based upon relevant evidence presented that a bona fide effort was made to file the report in accordance with the statutory requirements, including, but not limited to, unexplained delays in postal service or interruptions in Internet service.

(Emphasis added).

UP argues that a full and proper calculation of the penalty for these extremely late filed Independent Expenditure should be mitigated as this penalty is disproportionate to “the level of experience of the...treasurer or campaign staff.” UP argues that despite its PAC officials, consultant, and contributors having many years of experience leading, managing, staffing, and consulting for Maine campaigns (both State and municipal, both ballot question and candidate) and including involvement as the candidate, that they still possessed insufficient experience to understand one of the most basic features of a candidate campaign – Independent Expenditure reports.

UP admits in its December 13th letter that its Principal Officer “has been involved over the years in numerous political campaigns in a variety of capacities” and especially in “campaigns of candidates (including several campaigns of Ethan Strimling).” Specifically, Dory Ann Waxman has the following campaign experience:

2017	Better Schools Better Deal PAC	Treasurer
2016	Pious Ali for City Council	Treasurer
2015	Ethan Strimling for Mayor	Treasurer
2012	Nicholas Mavadones for City Council	Treasurer
2008	Dory Waxman for City Council*	Candidate
2008-11	Portland City Council	

*note there was an IE in this race against Waxman’s opponent Ed Suslovic

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UP admits that its Treasurer was also a Treasurer recently on a ballot committee. Specifically, Elliot Vrana was the Treasurer of the “Say No to Rent Control” PAC in 2017 and his accounting firm provided accounting services to that campaign. Having been the Treasurer on a citywide ballot question campaign, Vrana should have understood basic campaign disclosure requirements.

UP also hired a very experienced campaign consultant, Lance Dutson, to provide campaign consulting services. The following is from Dutson’s company webpage:

Lance Dutson has served as an advisor and strategist for a wide array of elected officials and candidates, and has managed public affairs efforts at both the state and local level.

In 2017, Lance managed the referendum campaign to defeat a rent control initiative in the city of Portland, Maine, winning by nearly 30 points and capturing all five wards of the city. He served as Communications Director for the campaign of U.S. Senator Susan Collins in 2014, and managed the 2012 U.S. Senate campaign of GOP candidate Charlie Summers. Dutson worked on the campaign communications team of U.S. Senator Kelly Ayotte of New Hampshire, as well as the Maine Republican Party, in 2010. He has experience in both state and federal government, as one of the first New Media Directors on Capitol Hill for Senator Collins, and as Special Assistant for Communications to the Maine Speaker of the House.

Dutson’s work focuses heavily on the use of social media and digital tools to augment traditional campaign communications efforts. He has served as a spokesperson for numerous candidates and policy initiatives, has been a featured guest on national and local news and public affairs programs, and writes a weekly column for the Bangor Daily News.

Lance was named one of the ‘25 Most Influential’ figures in Maine politics in 2012, and has won numerous awards for commercial and political web development projects.

<http://www.redhillstrategies.com/about-us/>. EXHIBIT F. UP conveniently fails to mention the candidate campaign experience of Dutson in any of their responses to the Ethics Commission.

However, UP argues that because Ms. Waxman never served as the treasurer of a PAC or a party committee that this somehow exculpates her from understanding what an independent expenditure is and the importance of filing IE reports in a candidate election. This is nonsensical. Even if we accept the argument that the principal officers for UP had insufficient campaign experience, this scenario would allow experienced campaigners to run a campaign, not make the required disclosures, and then blame the lack of filings on the inexperience of the principal officers to mitigate its penalties.

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There are a lot of other campaign finance requirements that UP was able to decipher, including filing a quarterly PAC report and 24-hour reports. Most experienced people on campaigns in Maine use the Ethics Commission as a reference when managing campaigns. The Ethics Commission has many resources providing guidance on IEs: <http://www.maine.gov/ethics/political-activity/clean-election-contributions/independent-expenditures>. Additionally, in the Ethics Commission published “Guidebook for Political Action Committees and Ballot Question Committees,” pages 21-26 provide detailed guidance on IEs. The following details Chapter 4 from the Table of Contents:

CHAPTER 4. SUPPORTING CANDIDATES & CAUSES 20

- Making Contributions 20
 - Contribution Limits 20
 - Prohibited Contributions from Lobbyists 20
 - In-Kind Contributions 21
- Independent Expenditures 21
 - What is an Independent Expenditure? 21
 - What Does Cooperation, Consultation, or in Concert with Mean? 22
 - Communications that Contain Express Advocacy 24
 - Rebutting the Presumption 24
 - Independent Expenditure Exclusions 24
 - When to File an Independent Expenditure Report 25
 - Filing Independent Expenditure Reports 25
 - Independent Expenditures in Municipal Elections 25
 - Late Independent Expenditures 26
- Membership Communications 26

Clearly, an experienced person on campaigns should have been able to decipher the Ethics Commission website and the PAC guidebook.

iv. Coordination?

Importantly, one of the most crucial reasons for filing timely Independent Expenditure reports in candidate campaigns is so the public may understand that these expenditures are not being made in coordination with a particular candidate campaign. Because the UP leadership is now arguing that they did not understand that their expenditures were Independent Expenditures at the time and did not understand that they had a responsibility to report these expenditure in a timely manner, it would be logical from their argument that they do not understand that the definition of an independent expenditure means an expenditure that is not coordinated with a campaign and that expressly advocates for a candidate. Because UP’s principal officer arguably did not understand the definition of what is an independent expenditure, she would not have timely signed the required attestation that the expenditure was made independently and not coordinated.

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v. Failure to report the IEs was part of a sophisticated pattern of nondisclosure.

UP is not taking seriously its failure to report its Independent Expenditures in an accelerated manner following its September expenditures. For over a month, the Public did not know who was expressly campaigning against Ethan Strimling in a series of Facebook videos – other than a new PAC named “Unite Portland.”

When UP finally filed its quarterly report on October 7th, it hid its specific expenditures behind two blanket payments to the TCV Group, LLC (TCV). EXHIBIT G. Such blanket payments to consultants are not allowed by the Ethics Commission, and thus UP was forced to amend its quarterly report over a week later on October 15th to provide more detail. However, TCV was the only payee listed on all of UP’s campaign finance reports and acted as a shell corporation used by UP to shield all other sub-vendors, consultants, and additional payees from the public.

UP hid the identity of this consultant. The public only learned later through the work of the Portland Press Herald that Lance Dutson was providing his consulting services through TCV. <https://www.pressherald.com/2019/10/17/strimlings-campaign-and-opponents-trade-ethics-complaints-in-mayoral-race/>. EXHIBIT H.

On August 5, 2019, the domain, “unitedportland.org,” was purchased for 1-year. EXHIBIT I. The domain registrant is “Domains by Proxy, LLC,” which is a service used to conceal the purchaser of a domain from the public. That company is based in Nevada. On UP’s initial quarterly finance report, UP failed to report any expenses associated with registering UnitePortland.org. Additionally, on their initial quarterly finance report, UP failed to report in-kind contributions for their P.O. Box, which they used to solicit contributions and as their address on their PAC registration. See EXHIBIT G.

UP started running Facebook ads on August 29th expressly opposing Strimling’s mayoral campaign but no Facebook expenditures were reported by UP until October 15th when UP amended its October Quarterly report. See EXHIBIT J. The October 15th filing reported that these Facebook expenditures occurred on September 26th, but it is the practice of Facebook to only accept upfront payment. From August 29th until October 14th, when they finally disclosed the Facebook expenditures, UP ran 17 Facebook ads. See EXHIBIT K.

It was only after the first complaint was filed by the Strimling Campaign with the City of Portland and the Press started to pay attention, that UP finally reported these expenditures. Even after the initial Strimling complaint on October 8th, UP did not file Independent Expenditures reports and the accompanying attestations that the expenditures were not coordinated with any candidates until October 23rd and 24th, over 2 weeks later.

The sophistication of the hiding of the participants in and the expenditures of the campaign consulting company demonstrate that the principals in UP had great experience in running political campaigns. Therefore, not only are there no mitigating circumstances upon which to

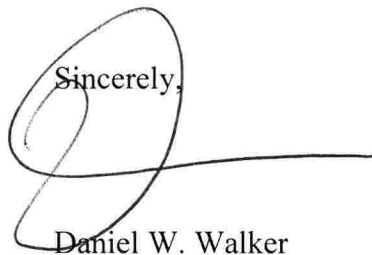
PRETI FLAHERTY

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lessen the penalties, there are aggravating circumstances that justify doubling and tripling of the maximum penalties.

Thank you for your attention to this matter.

Sincerely,

Daniel W. Walker

DWW:ecr
Enclosure(s)

Exh. A



COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES

Mail: 135 State House Station, Augusta, Maine 04333

Office: 45 Memorial Circle, 2nd floor, Augusta, Maine

Website: www.maine.gov/ethics

Phone: 207-287-4179

Fax: 207-287-6775

ACKNOWLEDGMENT OF RESPONSIBILITIES — PRINCIPAL OFFICER

I, Dorcy-Ann Richards Waxman, acknowledge that I am the principal officer
(Printed Name)
of Unite Portland, a political action committee registered with
(Name of Committee)

the Commission on Governmental Ethics and Election Practices (the "Commission"). I acknowledge that, as the principal officer of the committee:

(1) I am jointly responsible with the treasurer for ensuring that the committee complies with the requirements of Maine Election Law (21-A M.R.S.A., chapter 13) applicable to the committee. These requirements include but are not limited to:

- filing complete and accurate reports as required by the Commission;
- ensuring that the treasurer of the committee keeps all required records of contributions, expenditures and bank statements for the committee's campaign account; and
- updating the committee's registration information within 10 days of any change, including the resignation or removal of the treasurer or a decision-maker and filing an updated registration with the Commission by March 1st of every year in which there is a general election.

(2) I am jointly and severally liable with the treasurer and the committee for any penalties assessed against the committee for violations of Maine Election Law (21-A M.R.S.A., chapters 13 and 14).

(3) I am deemed to have participated in any spending decisions of the committee until the Commission has received notice of my resignation or involuntary removal from the committee.

(4) I am responsible for notifying the Commission and the committee's treasurer in writing if I resign from the position of principal officer and that my resignation will not be effective until the Commission receives such notice.

(5) The committee is responsible for notifying the Commission if the treasurer or a decision-maker is involuntarily removed from the committee.

I have read this acknowledgment and understand my responsibilities and liabilities as principal officer.

Signature: Dorcy-Ann Richards Waxman

Date: August 19, 2019

Failure to submit the Acknowledgement of Responsibilities may result in a fine of \$100.



ACKNOWLEDGMENT OF RESPONSIBILITIES — TREASURER

I, (print name) Elliot Thomas Vrana, acknowledge that I am the treasurer of Unite Portland a political action committee registered with the Commission on Governmental Ethics and Election Practices (the "Commission"). I acknowledge that, as the treasurer of the committee:

(1) I am jointly responsible with the principal officer for ensuring that the committee complies with the requirements of Maine Election Law (21-A M.R.S., chapter 13) applicable to the committee. These requirements include but are not limited to:

- filing complete and accurate reports as required by the Commission;
- keeping all required records of contributions, expenditures and bank statements for the committee's campaign account; and
- updating the committee's registration information within 10 days of any change, including the resignation or removal of the principal officer or a decision-maker and filing an updated registration with the Commission by March 1st of every year in which there is a general election.

(2) I am jointly and severally liable with the principal officer and the committee for any penalties assessed against the committee for violations of Maine Election Law (21-A M.R.S., chapters 13 and 14).

(3) I am deemed to have participated in any spending decisions of the committee until the Commission has received notice of my resignation or involuntary removal from the committee.

(4) I am responsible for notifying the Commission and the committee's principal officer in writing if I resign from the position of treasurer and that my resignation will not be effective until the Commission receives such notice.

(5) The committee is responsible for notifying the Commission if the principal officer or a decision-maker is involuntarily removed from the committee.

I have read this acknowledgment and understand my responsibilities and liabilities as treasurer.

Signature

08/15/2019

Date

DESIGNATED FILING AGENT(S) (OPTIONAL)

NAME MIDDLE NAME LAST NAME

EMAIL PHONE

PRIMARY FUNDRAISERS & DECISION-MAKERS

Identify the primary fundraisers and decision-makers for the committee and whether they are also a Legislator or candidate. (Use additional sheets as necessary.)

FIRST NAME MIDDLE NAME LAST NAME

EMAIL

ROLE (check all that apply) Fundraiser Decision-Maker Legislator Candidate

FIRST NAME MIDDLE NAME LAST NAME

EMAIL

ROLE (check all that apply) Fundraiser Decision-Maker Legislator Candidate

FORM OF ORGANIZATION

Name the form or structure of organization (i.e., cooperative, corporation, voluntary association, partnership, etc.)

FORM OF ORGANIZATION DATE OF ORIGIN OR INCORPORATION

PAC

FOUNDING ORGANIZATIONS

Was this committee formed by one or more for-profit or non-profit corporations or organizations? (Use additional sheets as necessary.)

If YES, NAME OF CORPORATION OR ORGANIZATION

Yes

ADDRESS

No

CITY, STATE, ZIP CODE

PHONE

COMMITTEE ACCOUNT INFORMATION

NAME ON ACCOUNT

Unite Portland

NAME OF FINANCIAL INSTITUTION

Bangor Savings Bank

MAILING ADDRESS (STREET, CITY, STATE, ZIP CODE)

20 Marginal Way, Portland, ME 04101

STATEMENT OF SUPPORT OR OPPOSITION

Indicate the specific candidate(s) or category of candidate(s), ballot question(s), referenda, initiated petition(s), people's vetoes, or other campaign(s) the committee supports or opposes. If the committee is formed to influence the election of a single candidate, the name of the candidate must be listed. (Use additional sheets as necessary.)

Strimling for Mayor

Support

Oppose

Support

Oppose

SIGNATURE OF PRINCIPAL OFFICER OR TREASURER

The Principal Officer, Treasurer and any Decision-Maker(s) must submit a signed Acknowledgement of Responsibilities.

NAME OF SIGNER

Dory - Ann Richards Waxman

TITLE

Principal Officer

SIGNATURE

Dory - Ann Richards Waxman

DATE

August 19, 2019

IMPORTANT NOTICE:

An initial campaign finance report must be filed with the Commission at the time of registration.

Exh. B

INDEPENDENT EXPENDITURE REPORT – NOVEMBER 5, 2019 MUNICIPAL ELECTION

Name of Person/Committee Making Expenditure(s): UNITE PORTLAND

Mailing Address: PO BOX 5200

City, State, Zip Code: PORTLAND MAINE 04101 Telephone: _____

Please check the appropriate box for the report you are filing and complete the notarized affidavit and attached schedules. Reports must be filed on Saturday or Sunday. If that is when they are due, please contact the municipal clerk's officer for the procedure for filing by fax or e-mail. The municipal clerk must receive the signed original report within 5 days after the preliminary report was filed.

Check here if this report is an amendment to a previously filed report. Date of original report: _____

Independent Expenditures of more than \$250 per candidate must reported according to the schedule below.

Report	Expenditure Made	Report Due Date
<input type="checkbox"/> 60-Day Pre-Election Report	On or before September 5, 2019	September 6, 2019
<input checked="" type="checkbox"/> 2-Day Report	Between September 6 - October 22, 2019	Within 2 calendar days of making the expenditure
<input type="checkbox"/> 1-Day Report	Between October 23 - November 5, 2019	Within 1 calendar day of making the expenditure



I CERTIFY THAT THE INFORMATION IN THIS REPORT IS TRUE, CORRECT AND COMPLETE.

Dory-Ann Richards Waxman
 Signature of PAC or Party Treasurer, or
 Other Authorized Person Making Expenditure(s)

Oct 22, 2019
 Date

Dory-Ann Richards Waxman

INDEPENDENT EXPENDITURE REPORT – 2019 MUNICIPAL ELECTION

AFFIDAVIT

STATE OF Maine

COUNTY OF Cumberland

I, Dory-Ann Richards Waxman, being duly sworn, attest that I made each of the expenditures listed in the attached report independently, and not in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate, authorized committee or agent of a candidate in a race affected by any expenditure listed in this report.

Dory-Ann Richards Waxman
Signature of Affiant

Sworn to before me, this 22nd day of October 2019

[Signature]
(Notary Public/Attorney at Law)

My commission expires: August 1st 2021



**Schedule B-IE-1
CANDIDATE(S) SUPPORTED/OPPOSED**

- Please list all candidates that were the subjects of independent expenditures.
- If more than one candidate was the subject of the expenditure, allocate the expenditure among the candidates.

Office sought by candidate (including district # or county)	Candidate's Name	Indicate whether expenditure was made in support of or in opposition to the candidate	Amount expended this reporting period for each candidate
MAYOR	ETHAN STRIMLING	OPPOSITION	\$4664.00
Total expenditures for all candidates this reporting period. <i>This amount should equal the total independent expenditures listed on Schedule B-IE-2, Line C. ⇒</i>			\$4664.00

**Schedule B-IE-2
PAYMENTS AND OBLIGATIONS**

- Please indicate the date, payee, expenditure type, and amount of each expenditure.
- If you are reporting an agreement or obligation to make a future payment, please check (✓) the box next to the expenditure type.

Expenditure Types				
LIT MHS PHO POL POS	Printing and graphics (flyers, signs, palmcards, etc.) Mail house (all services purchased) Phone banks, automated telephone calls Polling and research survey Postage for U.S. Mail and mail box fees	PRT RAD TVN WEB OTH	Print media ads only (newspapers, magazines) Radio ads, production costs TV or cable ads, production costs Website design, registration, hosting, maintenance, etc. Other (include description)	
Date of Expenditure	Payee, Address, Zip Code	Expenditure Type	✓	Amount
9/26/19	TCV GROUP LLC 201 US Route 1 #131 Scarborough ME 04074	OTH Facebook ads		\$4664.00
A. Expenditures for this page ⇒				\$4664.00
B. Total for all other Schedule B-IE-2 pages (if any) ⇒				
C. Total independent expenditures for this reporting period (A+B). This amount should equal the total amount for all candidates listed on Schedule B-IE-1. ⇒				\$4664.00

Exh. C



INDEPENDENT EXPENDITURE REPORT – NOVEMBER 5, 2019 MUNICIPAL ELECTION

Name of Person/Committee Making Expenditure(s): UNITE PORTLAND

Mailing Address: PO BOX 5200

City, State, Zip Code: PORTLAND MAINE 04101 Telephone: (207) 332-4634

Please check the appropriate box for the report you are filing and complete the notarized affidavit and attached schedules. Reports must be filed on Saturday or Sunday. If that is when they are due, please contact the municipal clerk's officer for the procedure for filing by fax or e-mail. The municipal clerk must receive the signed original report within 5 days after the preliminary report was filed.

Check here if this report is an amendment to a previously filed report. Date of original report: _____

Independent Expenditures of more than \$250 per candidate must reported according to the schedule below.

Report	Expenditure Made	Report Due Date
<input checked="" type="checkbox"/> 60-Day Pre-Election Report	On or before September 5, 2019	September 6, 2019
<input type="checkbox"/> 2-Day Report	Between September 6 - October 22, 2019	Within 2 calendar days of making the expenditure
<input type="checkbox"/> 1-Day Report	Between October 23 - November 5, 2019	Within 1 calendar day of making the expenditure

I CERTIFY THAT THE INFORMATION IN THIS REPORT IS TRUE, CORRECT AND COMPLETE.

Dorothy Ann Richards Waxman
Signature of PAC or Party Treasurer, or
Other Authorized Person Making Expenditure(s)

Oct 24 2019
Date

INDEPENDENT EXPENDITURE REPORT – 2019 MUNICIPAL ELECTION

AFFIDAVIT

STATE OF Maine

COUNTY OF Cumberland

I, Dory - Ann Richards Waxman being duly sworn, attest that I made each of the expenditures listed in the attached report independently, and not in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate, authorized committee or agent of a candidate in a race affected by any expenditure listed in this report.

Dory - Ann Richards Waxman
Signature of Affiant

Sworn to before me, this 24th day of October 2019

[Signature]
(Notary Public/Attorney at Law)



My commission expires: August 1st 2021

**Schedule B-IE-2
PAYMENTS AND OBLIGATIONS**

- Please indicate the date, payee, expenditure type, and amount of each expenditure.
- If you are reporting an agreement or obligation to make a future payment, please check (✓) the box next to the expenditure type.

Expenditure Types				
LIT MHS PHO POL POS	Printing and graphics (flyers, signs, palmcards, etc.) Mail house (all services purchased) Phone banks, automated telephone calls Polling and research survey Postage for U.S. Mail and mail box fees	PRT RAD TVN WEB OTH	Print media ads only (newspapers, magazines) Radio ads, production costs TV or cable ads, production costs Website design, registration, hosting, maintenance, etc. Other (include description)	
Date of Expenditure	Payee, Address, Zip Code	Expenditure Type	✓	Amount
9/1/19	TCV GROUP LLC 201 US Route 1 #131 Scarborough ME 04074	WEB		\$2979.84
9/1/19	TCV GROUP LLC 201 US Route 1 #131 Scarborough ME 04074	OTH Video production		\$3000.00
A. Expenditures for this page ⇒				\$5979.84
B. Total for all other Schedule B-IE-2 pages (if any) ⇒				
C. Total independent expenditures for this reporting period (A+B). This amount should equal the total amount for all candidates listed on Schedule B-IE-1. ⇒				\$5979.84

**Schedule B-IE-1
CANDIDATE(S) SUPPORTED/OPPOSED**

- Please list all candidates that were the subjects of independent expenditures.
- If more than one candidate was the subject of the expenditure, allocate the expenditure among the candidates.

Office sought by candidate (including district # or county)	Candidate's Name	Indicate whether expenditure was made in support of or in opposition to the candidate	Amount expended this reporting period for each candidate
MAYOR	ETHAN STRIMLING	OPPOSITION	\$5979.84
Total expenditures for all candidates this reporting period. <i>This amount should equal the total independent expenditures listed on Schedule B-IE-2, Line C. ⇒</i>			\$5979.84

Exh. D

Memo

To: Stephanie Clifford
From: Benjamin Gagnon
Cc: Mayor Ethan Strimling
Date: October 8, 2019
Re: Unite Portland October Quarterly Finance Report

Unite Portland (“UP”) registered as a PAC with the City of Portland Clerk on 8/19/2019. They are registered solely to oppose Strimling for Mayor. Dory-Ann Richards Waxman is listed as the Principal Officer and Elliot Thomas Vrana is listed as the treasurer. No other decision-makers or primary fundraisers are listed.

ERRORS IN THE FINANCE REPORT:

1. Contributor “Tom Watson and Co” is an LLC registered with the Maine Secretary of State, however the \$5,000 contribution is coded as coming from an individual.
2. Six contributions are listed as coming from two individuals. A single contribution cannot come from two people.
3. UP fails to disclose an occupation or employer for contributor “Rachel Alford.” “N/A” is not a valid response.
4. UP has incorrectly reported the media production and digital advertising expenses. These should be reported as TVN and WEB, respectively.
5. Purchases made by a consultant or firm are required to be reported as though the campaign made them directly. UP must list any sub-vendor that receives a payment of more than \$50 from a consultant (see attached example from the Maine Ethics Handbook).
6. UP has failed to report any expenses associated with their website UnitePortland.org. We know that the domain is registered by Domain By Proxy LLC (“DBP”) in Arizona. DPB is a company that is hired to keep the owner of a domain private in the WHOIS directory. The expenditures for DPB and the purchase of the domain itself should be reported.
7. We know from public Facebook disclosure that UP has spent \$3,200 on Facebook ads during the filing period. However, UP lumps all “digital advertising” (\$4,664) into one payment to The TCV Group, LLC. The public has no way of knowing where the other

almost \$1,400 was spent. The PAC must list Facebook and any other vendors it has paid for advertising.

8. The PAC lists its address as “PO Box 5200, Portland” on both the registration and finance report. However, there is no expenditure to the United States Postal Service for a PO Box Fee or an In-Kind contribution for the use of another entity’s PO Box.
9. We do not know if there are any other missing expenditures from the report. Only an audit of the PAC’s records by the Maine Ethics Commission could determine this.

ERRORS IN THE REGISTRATION

The PAC registered on 8/19/19 and has not filed any amendments. According to 21-A MRSA § 1052-A(1) “a committee shall amend the registration within 10 days of a change in the information.” No amendment to the original registration has been filed. The registration discloses no additional decision-makers or fundraisers other than the principal officer, Dory Waxman. In the signed acknowledgement of responsibilities Waxman agrees to participate in “any spending decisions of the committee” until she resigns or is removed from the committee. In a 10/02/2019 Portland Press Herald article, Waxman told a reporter that she was not aware an ad had been removed from Facebook. Additionally she said she would need to “speak with the campaign's social media coordinator to figure out why.”

There are two issues here:

1. Waxman has acknowledged she is not involved in all spending decisions of the PAC as is required by 21-A MRSA § 1052-A.
2. State election law and Commission rules require UP’s registration to contain any “individuals who are primarily responsible for making decisions” for the PAC. Waxman has admitted publicly that there is at least one undisclosed decision-maker. Since this social media coordinator is the one deciding when to spend and stop spending ad money, this individual's name and address must be disclosed on the registration.

Additionally, UP has not disclosed any fundraisers on their registration. 21-A MRSA § 1052-A also requires the committee to disclose the individuals who are “primarily responsible for raising contributions for the committee. The PAC has raised \$18,950 and must disclose any individual who solicited any of those contributions on behalf of the PAC.

THE TCV GROUP, LLC

The only payee on Unite Portland’s Finance Report is The TCV Group, LLC (TCV). TCV is being used to shield all sub-vendors and additional payees of the PAC. Commission Rules and State Statute require UP to report expenditures made on behalf of the PAC by a consultant as though the campaign made them directly (see attached example from the Maine Ethics Handbook).

What we know about TCV:

1. TCV is an LLC that filed a certificate of formation (attached) with the Maine Secretary of State Division of Corporations on 7/15/2019.
2. The only disclosed registered agent or authorized person is Gregory P Dorr.
 - a. Dorr is an attorney with the Bangor Law Firm Farrell, Rosenblatt, & Russell. Dorr lives in Bangor and is a registered Republican.
3. TCV's address is a UPS Box in Scarborough.

TCV does not have to file an annual report which lists the LLC's officers until 6/01/2020.

DONORS TO UNITE PORTLAND

There are 12 contributors to the PAC. A total of \$18,950 was raised through 9/30/2019.

The following are the top four funders of the PAC:

1. Tom Watson and Co, LLC; \$5,000 on 8/20/2019
2. James Brady; \$5,000 on 8/20/2019
3. Rachel Alford; \$5,000 on 9/26/2019
4. Cyrus Hagge; \$2,500 on 9/6/2019

These four contributors have given a combined \$17,500 (92.3% of total raised) to the PAC. These same four contributors along with the corporation and/or LLCs they control have contributed a combined \$5,000 to Spencer Thibodeau's campaign for mayor.

EXAMPLE: REPORTING PAYMENTS MADE TO A VENDOR WHO USED A SUB-VENDOR

SCHEDULE B - EXPENDITURES

DATE	NAME OF PAYEE	EXPENDITURE TYPE (use code)	REMARK	AMOUNT
8/10/2019	MEDIA ASSOCIATES	CNS	CONSULTING SERVICES FOR TV AD ; TOTAL PAID TO MEDIA ASSOC. \$32,600	\$1,600
8/10/2019	WMTW TV	TV	PAID BY MEDIA ASSOC ON BEHALF OF THE CAMPAIGN	\$20,000
8/10/2019	WABI TV	TV	PAID BY MEDIA ASSOC ON BEHALF OF THE CAMPAIGN	\$11,000

Exh. E



INDEPENDENT EXPENDITURE REPORT – NOVEMBER 5, 2019 MUNICIPAL ELECTION

Name of Person/Committee Making Expenditure(s): UNITE PORTLAND

Mailing Address: PO BOX 5200

City, State, Zip Code: PORTLAND MAINE 04101 Telephone: (207) 332-4634

Please check the appropriate box for the report you are filing and complete the notarized affidavit and attached schedules. Reports must be filed on Saturday or Sunday. If that is when they are due, please contact the municipal clerk's officer for the procedure for filing by fax or e-mail. The municipal clerk must receive the signed original report within 5 days after the preliminary report was filed.

Check here if this report is an amendment to a previously filed report. Date of original report: 10/21/19

Independent Expenditures of more than \$250 per candidate must reported according to the schedule below.

Report	Expenditure Made	Report Due Date
<input type="checkbox"/> 60-Day Pre-Election Report	On or before September 5, 2019	September 6, 2019
<input checked="" type="checkbox"/> 2-Day Report	Between September 6 - October 22, 2019	Within 2 calendar days of making the expenditure
<input type="checkbox"/> 1-Day Report	Between October 23 - November 5, 2019	Within 1 calendar day of making the expenditure

I CERTIFY THAT THE INFORMATION IN THIS REPORT IS TRUE, CORRECT AND COMPLETE.

Dany - Ann Richard Waxman
Signature of PAC or Party Treasurer, or
Other Authorized Person Making Expenditure(s)

Oct 24 2019
Date

INDEPENDENT EXPENDITURE REPORT – 2019 MUNICIPAL ELECTION

AFFIDAVIT

STATE OF Maine

COUNTY OF Cumberland

I, Dorcy - Ann Richards Waxman being duly sworn, attest that I made each of the expenditures listed in the attached report independently, and not in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate, authorized committee or agent of a candidate in a race affected by any expenditure listed in this report.

Dorcy - Ann Richards Waxman
Signature of Affiant

Sworn to before me, this 24th day of October 2019

Ciperin
(Notary Public/Attorney at Law)

My commission expires: August 1st 2021



**Schedule B-IE-2
PAYMENTS AND OBLIGATIONS**

- Please indicate the date, payee, expenditure type, and amount of each expenditure.
- If you are reporting an agreement or obligation to make a future payment, please check (✓) the box next to the expenditure type.

Expenditure Types					
LIT	Printing and graphics (flyers, signs, palmcards, etc.)	PRT	Print media ads only (newspapers, magazines)		
MHS	Mail house (all services purchased)	RAD	Radio ads, production costs		
PHO	Phone banks, automated telephone calls	TVN	TV or cable ads, production costs		
POL	Polling and research survey	WEB	Website design, registration, hosting, maintenance, etc.		
POS	Postage for U.S. Mail and mail box fees	OTH	Other (include description)		
Date of Expenditure	Payee, Address, Zip Code		Expenditure Type	✓	Amount
9/26/19	Facebook 1 Hacker Way Menlo Park, CA 94025	<u>VIA</u> TCV GROUP LLC 201 US Route 1 #131 Scarborough ME 04074	OTH Facebook ads		\$4664.00
A. Expenditures for this page ⇒					\$4664.00
B. Total for all other Schedule B-IE-2 pages (if any) ⇒					
C. Total independent expenditures for this reporting period (A+B). This amount should equal the total amount for all candidates listed on Schedule B-IE-1. ⇒					\$4664.00

Schedule B-IE-1

CANDIDATE(S) SUPPORTED/OPPOSED

- Please list all candidates that were the subjects of independent expenditures.
- If more than one candidate was the subject of the expenditure, allocate the expenditure among the candidates.

Office sought by candidate (including district # or county)	Candidate's Name	Indicate whether expenditure was made in support of or in opposition to the candidate	Amount expended this reporting period for each candidate
MAYOR	ETHAN STRIMLING	OPPOSITION	\$4664.00
<p style="text-align: right;">Total expenditures for all candidates this reporting period.</p> <p><i>This amount should equal the total independent expenditures listed on Schedule B-IE-2, Line C. ⇒</i></p>			\$4664.00

Exh. F



About Us

Red Hill Strategies was founded by Mike Leavitt and Lance Dutson.

Lance Dutson - Mike Leavitt

Lance Dutson has served as an advisor and strategist for a wide array of elected officials and candidates, and has managed public affairs efforts at both the state and local level.

In 2017, Lance managed the referendum campaign to defeat a rent control initiative in the city of Portland, Maine, winning by nearly 30 points and capturing all five wards of the city. He served as Communications Director for the campaign of U.S. Senator Susan Collins in 2014, and managed the 2012 U.S. Senate campaign of GOP candidate Charlie Summers. Dutson worked on the campaign communications team of U.S. Senator Kelly Ayotte of New Hampshire, as well as the Maine Republican Party, in 2010. He has experience in both state and federal government, as one of the first New Media Directors on Capitol Hill for Senator Collins, and as Special Assistant for Communications to the Maine Speaker of the House.



Dutson's work focuses heavily on the use of social media and digital tools to augment traditional campaign communications efforts. He has served as a spokesperson for numerous candidates and policy initiatives, has been a featured guest on national and local news and public affairs programs, and writes a weekly column for the Bangor Daily News.

Lance was named one of the '25 Most Influential' figures in Maine politics in 2012, and has won numerous awards for commercial and political web development projects.

Dutson has extensive experience in a wide array of public policy areas, including energy, health care, government transparency, and budget issues. He served as the Chief Executive Officer of The Maine Heritage Policy Center, a 501c3 organization focusing on state policy issues, and has been active in the public policy discussion in Maine for more than a decade.

Dutson has been an active figure in the emergence of new media as a force in political journalism. He ran one of Maine's first political blogs, Maine Web Report, that received national acclaim for its investigative work in Maine state government. He was one of the first online journalists to be credentialed to cover federal court cases during the 2007 trial of Bush administration advisor Lewis "Scooter" Libby. As CEO of The Maine Heritage Policy Center, he founded The Maine Wire, an online news project that has been instrumental in the public policy discussion in Maine since its launch in 2011. He has been a featured guest and lecturer on the topic of new media and journalism at the U.S. Naval Academy, University of Massachusetts, and Harvard Law. His work in the online journalism space has been recognized by a wide array of news outlets, including the Boston Globe, Washington Post, Columbia Journalism Review, PBS, and many others.

Lance has a background in web development and search engine marketing, and has extensive experience in all areas of political media, including polling, television and radio production, and web video production.

Red Hill Strategies

35 Alba Street
Portland, Maine 04103

Lance@RedHillStrategies.com
207-322-3843

Mike@RedHillStrategies.com
443-871-5490

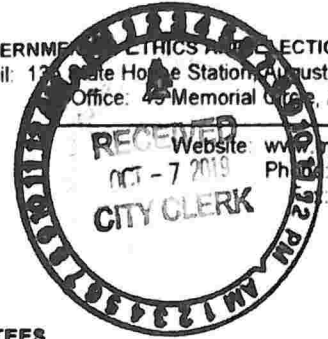
Harold Pachios interview with Lance Dutson



Exh. G



COMMISSION ON GOVERNMENT ETHICS AND ELECTION PRACTICES
 Mail: 13 State House Station, Augusta, Maine 04333
 Office: 49 Memorial Drive, Augusta, Maine



Website: www.maine.gov/ethics
 Phone: 207-287-4179
 Fax: 207-287-6775

2019 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES AND BALLOT QUESTION COMMITTEES

Please complete ALL entries.

NAME OF COMMITTEE	UNITE PORTLAND			<input type="checkbox"/> CHECK IF CHANGED FROM PREVIOUS REPORT
STREET	PO BOX 5200			
CITY AND ZIP CODE	PORTLAND 04101	TELEPHONE NUMBER	(207) 332-4634	
E-MAIL	N/A			
NAME OF TREASURER	ELLIOT VRANA			<input type="checkbox"/> CHECK IF CHANGED FROM PREVIOUS REPORT
MAILING ADDRESS STREET	PO BOX 8778			
CITY AND ZIP CODE	PORTLAND 04104	TELEPHONE NUMBER	(207) 441-1433	
E-MAIL	elliott.vrana@gmail.com			

Type of Report	Due Date	Dates of Report Period
<input type="checkbox"/> Initial	Date of Registration	January 1, 2019 — date of registration
<input type="checkbox"/> April Quarterly	April 10, 2019	January 1, 2019 — March 31, 2019
<input type="checkbox"/> July Quarterly	July 15, 2019	April 1, 2019 — June 30, 2019
<input checked="" type="checkbox"/> October Quarterly	October 7, 2018	July 1, 2019 — September 30, 2019
<input type="checkbox"/> January Quarterly	January 15, 2020	October 1, 2019 — December 31, 2019
<input type="checkbox"/> Amendment to: _____		
<input type="checkbox"/> No Activity Report: Use only if the committee had no contributions and no expenditures and did not incur any unpaid debts or obligations during the reporting period. Check the appropriate report above as well.		
<input type="checkbox"/> Termination Report: If the committee will have no further activity. Check the appropriate report above as well.		

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND TO THE BEST OF MY KNOWLEDGE IT IS TRUE, CORRECT, AND COMPLETE.

152

10/07/2019

Treasurer's Signature

Date

**SCHEDULE A
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the committee must report the contributor's name, address, occupation, and employer.
- If employment information has been requested from the contributor and the contributor has not provided it, indicate "information requested" for the occupation and employer.
- For cash contributions totaling \$50 or less, please enter "unitemized contributions" as the contributor and the total amount and the appropriate key code on a line on this page. Once a contributor has given the committee more than \$50 in a report period, you must list that contributor separately.

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	OCCUPATION AND EMPLOYER	TYPE (use key code)	AMOUNT
08/20/2019	TOM WATSON AND CO 188 STATE ST STE 303 PORTLAND, ME 04101	PORT PROPERTY MANAGEMENT	1	\$5,000
08/20/2019	JAMES & JULIA BRADY PO BOX 7486 PORTLAND, ME 04112	REAL ESTATE MANAGEMENT BRADY ENTERPRISES, INC.	1	5,000
08/20/2019	JED TROUBH 35 PADDOCK WAY FALMOUTH, ME 04105	SELF EMPLOYED REAL ESTATE DEVELOPMENT	1	250
08/20/2019	MICHAEL PIZZO & MARIA TRIVELLIN 88 CHRISTY RD PORTLAND, ME 04103	RETIRED	1	250
08/20/2019	HAROLD PACHIOS 882 SHORE RD CAPE ELIZABETH, ME 04107	LAWYER PRETI FLAHERTY	1	100
09/06/2019	DANIEL & CONNIE HALEY 140 EASTERN PROMENADE PORTLAND, ME 04101	RETIRED	1	250
Total cash contributions (this page only) => (combined totals from all Schedule A pages must be listed on Schedule F)				\$10,850

Key Codes:

- | | |
|--------------------------------|---------------------------------------|
| 1 = Individuals | 7 = Ballot Question Committee |
| 3 = Commercial Source | 9 = Candidate/Candidate Committees |
| 4 = Non Profit Organization | 10 = General Treasury Transfer |
| 5 = Political Action Committee | 12 = Contributors giving \$50 or Less |
| 6 = Political Party Committee | 16 = Financial Institution |

**SCHEDULE A (continued)
CASH CONTRIBUTIONS**

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	OCCUPATION AND EMPLOYER	TYPE (use key code)	AMOUNT
09/06/2019	CYRUS HAGGE 225 COMMERCIAL ST STE 502 PORTLAND, ME 04101	SELF REAL ESTATE	1	\$2,500
09/26/2019	MARY COSTIGAN 86 CHENERY ST PORTLAND, ME 04103	LAWYER BERNSTEIN SHUR	1	250
09/26/2019	ISA & JAMES RATHBAND PO BOX 17851 PORTLAND, ME 04112	REAL ESTATE BROKER KELLER WILLIAMS REALTY	1	150
09/26/2019	JOAN MORTAY & MICHAEL BRENNAN 49 WELLINGTON RD PORTLAND, ME 04103	STATE OF MAINE STATE LEGISLATOR	1	100
09/26/2019	RACHAEL ALFOND 143 VAUGHAN ST PORTLAND, ME 04102	N/A N/A	1	5000
09/26/2019	THOMAS & CATHERINE WALLACE 68 NEAL ST PORTLAND, ME 04102	SELF-EMPLOYED FREELANCE WRITER	1	100
Total cash contributions (this page only) ⇒				\$8,100
(combined totals from all Schedule A pages must be listed on Schedule F)				

Key Codes:

- | | |
|--------------------------------|---------------------------------------|
| 1 = Individuals | 7 = Ballot Question Committee |
| 3 = Commercial Source | 9 = Candidate/Candidate Committees |
| 4 = Non Profit Organization | 10 = General Treasury Transfer |
| 5 = Political Action Committee | 12 = Contributors giving \$50 or Less |
| 6 = Political Party Committee | 16 = Financial Institution |

**SCHEDULE B - 1
OPERATING EXPENSES**

List all operational expenditures made to a single payee or creditor that were made during this reporting period. Multiple expenditures for bank fees and vehicle travel may be aggregated and listed as a lump sum provided that the time period of the expenditure be identified in the remark section.

EXPENDITURE TYPES				
CON	Contribution to candidate, party or committee	POL	Polling and survey research	
CNS	Campaign consultants	POS	Postage for U.S. Mail and mail box fees	
EQP	Equipment (office machines, furniture, cell phones)	PRO	Professional services	
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)	
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs	
LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs	
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)	
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs	
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.)	
PHO	Phone banks, automated telephone calls			
I REMARKS REQUIRED FOR ALL EXPENDITURE TYPES I.				
DATE	PAYEE NAME & ADDRESS	TYPE	REMARKS (REQUIRED)	AMOUNT
09/01/2019	THE TCV GROUP, LLC 201 US ROUTE ONE #131 SCARBOROUGH, ME 04074	CNS	CAMPAIGN CONSULTING AND MEDIA PRODUCTION	\$10,000
09/26/2019	THE TCV GROUP, LLC 201 US ROUTE ONE #131 SCARBOROUGH, ME 04074	CNS	DIGITAL ADVERTISING	4,664
Total expenditures (this page only) =>				\$14,664
(combined totals from all Schedule B-1 pages must be listed on Schedule F)				

PAC/BQC Name: UNITE PORTLAND

**SCHEDULE F
SUMMARY SCHEDULE**

CASH ACTIVITY

Receipts	Total for this Period
1. Cash Contributions (Schedule A)	\$18,950
2. Other Cash Receipts (interest, etc.)	-
3. Loans (Schedule C)	-
4. Total Receipts (lines 1 + 2 + 3)	\$18,950
Expenditures	Total for this Period
5. Expenditures to Support or Oppose (Schedule B)	\$ -
6. Operating Expenditures (Schedule B-1)	14,664
7. Loan Repayment (Schedule C)	-
8. Total Payments (lines 5 + 6 + 7)	\$14,664

CASH SUMMARY

	Total for This Period
9. Cash Balance at Beginning of Period	\$ -
10. Plus Total Receipts This Period (line 4 above)	18,950
11. Minus Total Payments This Period (line 8 above)	(14,664)
12. Cash Balance at End of Period	4,286

OTHER ACTIVITY

	Total for This Period
13. In-Kind Contributions (Schedule A-1)	\$ -
14. Total Loan Balance at End of Period (Schedule C)	-
15. Total Unpaid Debts at End of Period (Schedule D)	-

Exh. H

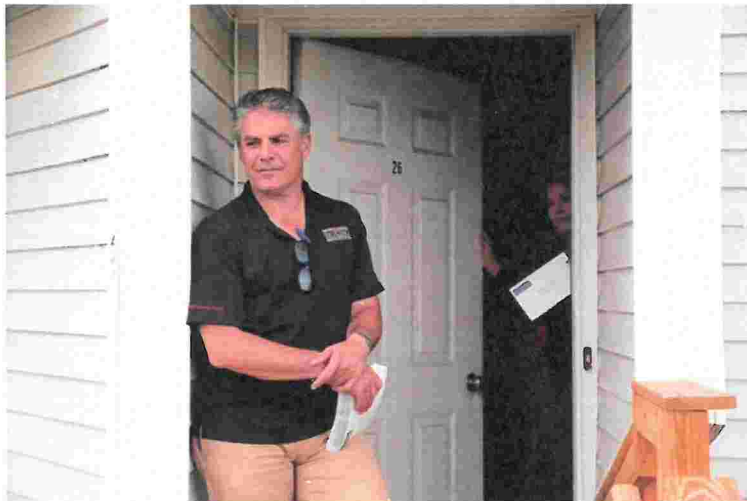
Strimling's campaign and opponents trade ethics complaints in mayoral race

[pressherald.com/2019/10/17/strimlings-campaign-and-opponents-trade-ethics-complaints-in-mayoral-race/](https://www.pressherald.com/2019/10/17/strimlings-campaign-and-opponents-trade-ethics-complaints-in-mayoral-race/)

By Randy Billings Staff Writer

October 18,
2019

Mayor Ethan Strimling's campaign has filed a formal complaint with the Maine Ethics Commission about a group opposing his re-election, saying Unite Portland failed to file disclosure reports and has continued trying to conceal the identity of its primary consultant.



Portland Mayor Ethan Strimling campaigns door-to-door last month on Munjoy Hill. *Ben McCanna/Staff Photographer*

That consultant is Lance Dutson, a well-known Republican political operative who confirmed to the Press Herald that he is doing campaign work for the group under the banner of a new limited liability company whose only address is a post office box in Scarborough.

Meanwhile, Unite Portland filed its own campaign finance complaint Thursday against Strimling's campaign, saying it failed to report in-kind contributions from Progressive Portland, a nonprofit that has endorsed the mayor and is helping him raise money and organize his field operations.

The dueling complaints announced Thursday – coupled with the mystery surrounding the PAC's political consultant – are unusual in a municipal election in Maine and reflect a rising level of political organizing and spending in Portland.

Jonathan Wayne, executive director of the Maine Ethics Commission, said the Portland City Clerk's Office could refer complaints to the ethics commission for enforcement, or seek to address them itself by requesting additional information from the parties involved.

"Our office rarely receives complaints from the city clerks for enforcement," Wayne said Thursday. "When we do, the staff schedules them for consideration by the commissioners at a public meeting. If the commissioners direct us to investigate the complaint, then we will."

Portland City Clerk Katherine Jones said in an email that her office was reviewing the complaints. She did not respond to questions about the process moving forward.

Strimling's campaign manger, Stephanie Clifford, said in a letter to city and state election officials Wednesday that Unite Portland should be fined between \$8,600 and \$17,200 for failing to file independent expenditure reports. Unite Portland filed a quarterly campaign finance report on Oct. 7 and an amended report Tuesday, but the additional reports are required when \$250 or more is spent in support of or in opposition to a candidate between Labor Day and Election Day, she said.



Clifford also accused Unite Portland of having decision-makers who are not listed on the PAC's registration and should be identified. And she accused the group of "shielding individual sub-vendors and consultants" through the use of a limited liability company.

"We are now less than three weeks away from election day - absentee ballots are out and early voting has begun," she said. "Unite Portland has flagrantly ignored multiple Maine statutes and Maine Ethics Commission rules. This matter must be referred to the Maine Ethics Commission for immediate investigation and enforcement. Portlanders deserve transparency around PACs trying to influence elections, and Unite Portland must be held accountable."

Unite Portland has reported nearly \$19,000 in funding almost exclusively from a handful of landlords and developers. It filed an amended finance report in response to issues raised by Strimling's campaign, but did not address the core issues raised by the mayor's campaign.

The amended report provided more detail about the nearly \$15,000 it has paid the TCV Group LLC for campaign work, including \$6,000 for video production and website development, \$4,000 for consulting, \$20 for web domain and \$4,665 for Facebook ads.

Former City Councilor Dory Waxman, who is listed as the decision-maker for Unite Portland, has declined to provide more information about the organization and did not return calls or emails to discuss who was behind the TCV Group. However, she issued a written statement in response to Strimling's complaint that sought to deflect criticism to Progressive Portland.

"Unite Portland has publicly and transparently reported our donors and expenditures," Waxman said. "By contrast, Progressive Portland is publicly fundraising and organizing for Ethan Strimling while failing to file any finance reports and hiding their donors. This dark money group has no place in Portland politics and Ethan Strimling should publicly disavow their involvement."

Related

[Our complete coverage of the 2019 Portland mayoral race](#)

TCV Group is a limited liability company that formed in July – about a month before Unite Portland registered with the city. The only name listed in the certificate of formation is Gregory Dorr, a Bangor attorney who did not respond to voicemails or an email Wednesday seeking additional information. It lists 210 Route 1 #131 in Scarborough as the address for TCV Group, but that is just a post office box at the UPS Store.

Dutson, a veteran Republican campaign consultant whose company, Red Hill Strategies, worked for the successful campaign to defeat a rent control measure in Portland two years ago, said the TCV Group is a new company he created to provide consulting services.

Dutson wouldn't discuss why he is providing campaign services through a new LLC rather than under the Red Hill banner, or explain the origins of the company's name or whether anyone else works there. But he said the LLC was "absolutely not" intended to hide his involvement.

"I do a lot of business with a lot of different people," Dutson said. "The arrangements I have with me and my clients are between me and my clients."

He added, "I have never seen so much concern over who is shooting videos for a campaign before."

Related

[Business group accuses Portland mayor of misleading supporters by saying he was 'heckled'](#)

City Councilor Spencer Thibodeau, a real estate attorney, former Portland School Board Chair Kate Snyder and waiter Travis Curran are challenging Strimling for the full-time position that comes with a \$73,000 salary and a four-year term, but no executive authority over city operations.

Wayne, director of the ethics commission, said Wednesday that he didn't see any obvious violations in Unite Portland's amended quarterly filing.

"On its face, the amended report seems to be mostly compliant," Wayne said. "If the PAC were reporting directly to our office, we might suggest some minor details be handled differently."

Wayne said it is unusual for a political consultant to be an LLC that can't easily be traced to a specific individual or firm because they typically want to advertise their services. He could think of only one other instance when this was an issue at the state level, but he declined to provide details about that other case. PACs typically list the individual vendors who are easily identifiable and are paid to do specific work, he said.

Shortly after Strimling's campaign announced its complaint Thursday, Unite Portland filed its own complaint against Strimling's campaign over the involvement of Progressive Portland, which they describe as an "active participant in Portland's mayoral election."

Unite Portland said Strimling's campaign should be reporting contributions from Progressive Portland and its founder and President Steven Biel because they are providing services of value.

Strimling's campaign has said it is not obligated to include Progressive Portland in its reports because the group has not spent any money on the campaign. Biel has described himself as a volunteer.

But Unite Portland notes that Biel is a professional political consultant who advertises services such as building email lists, "blockbuster online fundraising," messaging and media strategy, and organizing and user-generated petitions."

The volunteer provision of campaign finance law does not cover his services, or Progressive Portland's, they said, so the nonprofit and Strimling's campaign should be reporting those activities as in-kind donations, which are limited to \$850.

"Progressive Portland, while acting as Mr. Strimling's de facto campaign and fundraising organization, is using their nonprofit status to mask vendor and contributor information that Strimling's campaign is required by law to report," the group said.

Biel called the accusation “utterly baseless.” And an attorney representing Strimling’s campaign said the complaint by Unite Portland was a “retaliatory attempt to deflect attention from their own violations of Maine campaign laws.”

Attorney Daniel Walker of the Preti Flaherty law firm said that state law does not count volunteer time or services as contributions.

“At no time was a political contribution, of any kind, made by any individual – in kind or otherwise,” Walker said in a written statement. “Thus, Unite Portland’s allegations demonstrate a lack of understanding of Maine’s campaign laws and our long tradition of encouraging volunteer participation in our democratic process.

“This is, perhaps, not a surprise given Unite Portland’s demonstrated disregard for campaign finance laws and disclosure as outlined in the Strimling campaign’s recent ethics complaints filed against Unite Portland, as recently as yesterday.”

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Invalid username/password.

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Create a commenting profile by providing an email address, password and display name. You will receive an email to complete the registration. Please note the display name will appear on screen when you participate.

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Use the form below to reset your password. When you've submitted your account email, we will send an email with a reset code.

[« Previous](#)

[Business group accuses Portland mayor of misleading supporters by saying he was 'heckled'](#)
[Next »](#)

[Thibodeau endorsed by 11 former mayors, including 3 who supported Strimling in last election](#)

Exh. I

Domain Name Registration Data Lookup

Enter a domain name

[Frequently Asked Questions \(FAQ\) \(/faq\)](#)

uniteportland.org

Lookup

By submitting any personal data, I acknowledge and agree that the personal data submitted by me will be processed in accordance with the ICANN [Privacy Policy \(https://www.icann.org/privacy/policy\)](https://www.icann.org/privacy/policy), and agree to abide by the website [Terms of Service \(https://www.icann.org/privacy/tos\)](https://www.icann.org/privacy/tos) and the [Domain Name Registration Data Lookup Terms of Use](#).

Domain Information

Name: uniteportland.org

Registry Domain ID: D402200000011108562-LROR

Domain Status:

[clientDeleteProhibited \(https://icann.org/epp#clientDeleteProhibited\)](https://icann.org/epp#clientDeleteProhibited)

[clientRenewProhibited \(https://icann.org/epp#clientRenewProhibited\)](https://icann.org/epp#clientRenewProhibited)

[clientTransferProhibited \(https://icann.org/epp#clientTransferProhibited\)](https://icann.org/epp#clientTransferProhibited)

[clientUpdateProhibited \(https://icann.org/epp#clientUpdateProhibited\)](https://icann.org/epp#clientUpdateProhibited)

Nameservers:

ns27.domaincontrol.com

ns28.domaincontrol.com

Dates

Registry Expiration: 2020-08-05 23:17:25 UTC

Registrar Expiration: 2020-08-05 23:17:25 UTC

Updated: 2019-10-05 03:48:42 UTC

Created: 2019-08-05 23:17:25 UTC

Contact Information

Registrant:

Organization: Domains By Proxy, LLC

Mailing Address: Arizona, United States

Technical:

Organization: Domains By Proxy, LLC

Mailing Address: Arizona, United States

Administrative:

Organization: Domains By Proxy, LLC

Mailing Address: Arizona, United States

Billing:

Organization: Domains By Proxy, LLC

Mailing Address: Arizona, United States

Redacted for privacy: some of the data in this object has been removed.

Registrar Information

Name: GoDaddy.com, LLC

IANA ID: 146

Abuse Contact Email: abuse@godaddy.com

Abuse Contact Phone: tel:480-624-2505

DNSSEC Information

Delegation Signed: Unsigned

Authoritative Servers

Registry Server URL: <https://rdap.publicinterestregistry.net/rdap/org/domain/uniteportland.org> (<https://rdap.publicinterestregistry.net/rdap/org/domain/uniteportland.org>)

Last updated from Registry RDAP DB: 2019-12-17 14:19:42 UTC

Registrar Server URL: [https://rdap.godaddy.com/v1/domain/uniteportland.org_\(https://rdap.godaddy.com/v1/domain/uniteportland.org\)](https://rdap.godaddy.com/v1/domain/uniteportland.org_(https://rdap.godaddy.com/v1/domain/uniteportland.org))

Last updated from Registrar RDAP DB: 2019-12-17 14:20:42 UTC

Raw Registry RDAP Response ▼

Raw Registrar RDAP Response ▼



Youtube

(<http://www.youtube.com/icannnews>)



Twitter

(<https://www.twitter.com/icann>)



LinkedIn

(<https://www.linkedin.com/company/icann>)



Flickr

(<http://www.flickr.com/photos/icann>)



Facebook

(<http://www.facebook.com/icannorg>)



Newletters

(<https://www.icann.org/resources/pages/global-newsletter-2018>)



Community Wiki

(<https://community.icann.org/>)



ICANN Blog

(<https://www.icann.org/news/blog>)

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Policy (<https://www.icann.org/privacy/cookies>)

Exh. J

UNITE PORTLAND



October 15, 2019

Katherine Jones, City Clerk
389 Congress Street
Room 203
Portland, ME 04101

Dear Kathy,

Enclosed is our amended October Quarterly finance report. There were a few categorization errors in our original submission, and we have provided further detail on expenditures to clarify the specific online advertising medium we used:

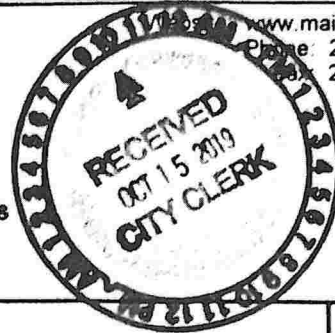
- Schedule A:
 - o Recategorized donation from Tom Watson and Company as a commercial source;
 - o Updated employer/occupation information for Rachel Alfond;
 - o Removed partner names from several donations;
- Schedule A1:
 - o Added an in-kind expenditure for use of post office box;
- Schedule B:
 - o Moved expenditures from Schedule B1 (Operating Expenses) to Schedule B;
 - o Separated vendor payments to detail purchases for website domain and online advertising;

In reference to questions about organizational decision making, our initial registration addressed this appropriately. Unite Portland has a strong base of volunteer support, and there are many Portlanders who have stepped up to provide insight and voice concerns about the future of our city and this mayoral campaign. We also retain a vendor who provides media production and ad placement services. At the end of the day, both our volunteers and our vendors serve at my direction, as the decision maker for the PAC.

Sincerely,

A handwritten signature in black ink that reads "Dory Waxman".

Dory Waxman
Unite Portland



2019 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES AND BALLOT QUESTION COMMITTEES

Please complete ALL entries.

NAME OF COMMITTEE	UNITE PORTLAND			<input type="checkbox"/> CHECK IF CHANGED FROM PREVIOUS REPORT
STREET	PO BOX 5200			
CITY AND ZIP CODE	PORTLAND 04101	TELEPHONE NUMBER	(207) 332-4634	
E-MAIL	N/A			
NAME OF TREASURER	ELLIOT VRANA			<input type="checkbox"/> CHECK IF CHANGED FROM PREVIOUS REPORT
MAILING ADDRESS STREET	PO BOX 8778			
CITY AND ZIP CODE	PORTLAND 04104	TELEPHONE NUMBER	(207) 441-1433	
E-MAIL	elliott.vrana@gmail.com			

Type of Report	Due Date	Dates of Report Period
<input type="checkbox"/> Initial	Date of Registration	January 1, 2019 — date of registration
<input type="checkbox"/> April Quarterly	April 10, 2019	January 1, 2019 — March 31, 2019
<input type="checkbox"/> July Quarterly	July 15, 2019	April 1, 2019 — June 30, 2019
<input type="checkbox"/> October Quarterly	October 7, 2018	July 1, 2019 — September 30, 2019
<input type="checkbox"/> January Quarterly	January 15, 2020	October 1, 2019 — December 31, 2019
<input checked="" type="checkbox"/> Amendment to:	<u>OCTOBER QUARTERLY</u>	
<input type="checkbox"/> No Activity Report: Use only if the committee had no contributions and no expenditures and did not incur any unpaid debts or obligations during the reporting period. Check the appropriate report above as well.		
<input type="checkbox"/> Termination Report: If the committee will have no further activity. Check the appropriate report above as well.		

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND TO THE BEST OF MY KNOWLEDGE IT IS TRUE, CORRECT, AND COMPLETE.

52

10/15/2019

Treasurer's Signature

Date

AC/BQC Name: UNITE PORTLAND

**SCHEDULE A
CASH CONTRIBUTIONS**

- For contributors who gave more than \$50, the committee must report the contributor's name, address, occupation, and employer.
- If employment information has been requested from the contributor and the contributor has not provided it, indicate "information requested" for the occupation and employer.
- For cash contributions totaling \$50 or less, please enter "unitemized contributions" as the contributor and the total amount and the appropriate key code on a line on this page. Once a contributor has given the committee more than \$50 in a report period, you must list that contributor separately.

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	OCCUPATION AND EMPLOYER	TYPE (use key code)	AMOUNT
08/20/2019	TOM WATSON AND CO 188 STATE ST STE 303 PORTLAND, ME 04101	PORT PROPERTY MANAGEMENT	3	\$5,000
08/20/2019	JAMES BRADY PO BOX 7486 PORTLAND, ME 04112	REAL ESTATE MANAGEMENT BRADY ENTERPRISES, INC.	1	5,000
08/20/2019	JED TROUBH 35 PADDOCK WAY FALMOUTH, ME 04105	SELF EMPLOYED REAL ESTATE DEVELOPMENT	1	250
08/20/2019	MICHAEL PIZZO 88 CHRISTY RD PORTLAND, ME 04103	RETIRED	1	250
08/20/2019	HAROLD PACHIOS 882 SHORE RD CAPE ELIZABETH, ME 04107	LAWYER PRETI FLAHERTY	1	100
09/06/2019	DANIEL HALEY 140 EASTERN PROMENADE PORTLAND, ME 04101	RETIRED	1	250
Total cash contributions (this page only) =>				\$10,850
(combined totals from all Schedule A pages must be listed on Schedule F)				

Key Codes:

- | | |
|--------------------------------|---------------------------------------|
| 1 = Individuals | 7 = Ballot Question Committee |
| 3 = Commercial Source | 9 = Candidate/Candidate Committees |
| 4 = Non Profit Organization | 10 = General Treasury Transfer |
| 5 = Political Action Committee | 12 = Contributors giving \$50 or Less |
| 6 = Political Party Committee | 16 = Financial Institution |

PAC/BQC Name: UNITE PORTLAND

**SCHEDULE A (continued)
CASH CONTRIBUTIONS**

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	OCCUPATION AND EMPLOYER	TYPE (use key code)	AMOUNT
09/06/2019	CYRUS HAGGE 225 COMMERCIAL ST STE 502 PORTLAND, ME 04101	SELF REAL ESTATE	1	\$2,500
09/26/2019	MARY COSTIGAN 86 CHENERY ST PORTLAND, ME 04103	LAWYER BERNSTEIN SHUR	1	250
09/26/2019	JAMES RATHBAND PO BOX 17851 PORTLAND, ME 04112	REAL ESTATE BROKER KELLER WILLIAMS REALTY	1	150
09/26/2019	MICHAEL BRENNAN 49 WELLINGTON RD PORTLAND, ME 04103	STATE OF MAINE STATE LEGISLATOR	1	100
09/26/2019	RACHAEL ALFOND 143 VAUGHAN ST PORTLAND, ME 04102	HOMEMAKER SELF	1	5000
09/26/2019	THOMAS WALLACE 68 NEAL ST PORTLAND, ME 04102	SELF-EMPLOYED FREELANCE WRITER	1	100
Total cash contributions (this page only) ⇒				\$8,100
(combined totals from all Schedule A pages must be listed on Schedule F)				

Key Codes:

- | | |
|--------------------------------|---------------------------------------|
| 1 = Individuals | 7 = Ballot Question Committee |
| 3 = Commercial Source | 9 = Candidate/Candidate Committees |
| 4 = Non Profit Organization | 10 = General Treasury Transfer |
| 5 = Political Action Committee | 12 = Contributors giving \$50 or Less |
| 6 = Political Party Committee | 16 = Financial Institution |

**SCHEDULE A-1
IN-KIND CONTRIBUTIONS**

- In-kind contributions are goods and services (including facilities) that a committee received at no cost or at a cost less than the fair market value. They include all goods and services purchased for the committee by others if the committee does not expect to reimburse the person who made the purchase.
- For contributors who gave more than \$50, the committee must report the contributor's name, address, occupation, and employer.
- If employment information has been requested from the contributor and the contributor has not provided it, indicate "information requested" for the occupation and employer.
- For contributions totaling \$50 or less, please enter "unitemized contributions" as the contributor and the total amount and the appropriate key code on a line on this page. Once a contributor has given the committee more than \$50 in a report period, you must list that contributor separately.

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	OCCUPATION AND EMPLOYER	DESCRIPTION (of goods, services, facilities, or discounts received)	TYPE (use key code)	VALUE (estimated fair market value)
09/01/2019	JUSTIN ALFOND 143 VAUGHAN ST PORTLAND, ME 04102	ENTREPRENEUR SELF	POST OFFICE BOX RENTAL FEE	1	\$61.00
Total in-kind contributions (this page only) ⇒ (combined totals from all Schedule A-1 pages must be listed on Schedule F)					\$61.00

Key Codes:

- 1 = Individuals
- 3 = Commercial Source
- 4 = Non Profit Organization
- 5 = Political Action Committee
- 6 = Political Party Committee

- 7 = Ballot Question Committee
- 9 = Candidate/Candidate Committees
- 10 = General Treasury Transfer
- 12 = Contributors giving \$50 or Less
- 16 = Financial Institution

**SCHEDULE B
EXPENDITURES TO SUPPORT OR OPPOSE**

- Enter all expenditures, including cash contributions from this committee, made to support or oppose a candidate, political action committee, ballot question committee, or party committee.
- Enter all expenditures made to support or oppose a ballot question, referendum, or citizen initiative, including expenditures made in the signature-gathering phase.
- Enter the name of the candidate, ballot question, or committee supported or opposed by the expenditure and indicate whether the expenditure was made in support or opposition.

If a single expenditure is made to support or oppose multiple candidates, committees, or ballot questions, the expenditure must be itemized by the amount spent per candidate, committee, or ballot question, not as a single expenditure, and each candidate, committee, or ballot question must be identified.

EXPENDITURE TYPES			
CON	Contribution to candidate, party or committee	POL	Polling and survey research
CNS	Campaign consultants	POS	Postage for U.S. Mail and mail box fees
EQP	Equipment (office machines, furniture, cell phones)	PRO	Professional services
FND	Fundraising events	PRT	Print media ads only (newspapers, magazines, etc.)
FOD	Food for campaign events, volunteers	RAD	Radio ads, production costs
LIT	Printing and graphics (flyers, signs, palmcards, t-shirts, etc.)	SAL	Campaign workers' salaries and personnel costs
MHS	Mail house (all services purchased)	TRV	Travel (fuel, mileage, lodging, etc.)
OFF	Office rent, utilities, phone and internet services, supplies	TVN	TV or cable ads, production costs
OTH	Other	WEB	Website design, registration, hosting, maintenance, etc.)
PHO	Phone banks, automated telephone calls		
! REMARKS REQUIRED ON ALL EXPENDITURE TYPES!			
Date: 09/01/2019	Payee Name and Address: THE TCV GROUP, LLC 201 US ROUTE ONE #131 SCARBOROUGH, ME 04074		Amount \$5,979.84
Type: WEB	Remarks (Required): VIDEO PRODUCTION, WEBSITE DEVELOPMENT		
<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Candidate Name/Ballot Question: ETHAN STRIMLING FOR MAYOR		
Date: 09/01/2019	Payee Name and Address: THE TCV GROUP, LLC 201 US ROUTE ONE #131 SCARBOROUGH, ME 04074		Amount 4,000.00
Type: CNS	Remarks (Required): CAMPAIGN CONSULTING		
<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Candidate Name/Ballot Question: ETHAN STRIMLING FOR MAYOR		
Total expenditures this page only => (combined totals from all Schedule B pages must be listed on Schedule F)			\$9,979.84

AC/BQC Name: _____

UNITE PORTLAND

**SCHEDULE B (continued)
EXPENDITURES TO SUPPORT OR OPPOSE**

Date: 09/01/2019	Payee Name and Address: THE TCV GROUP, LLC 201 US ROUTE ONE #131 SCARBOROUGH, ME 04074	Amount \$20.16
Type: WEB	Remarks (Required): DOMAIN NAME REGISTRATION - GODADDY	
<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Candidate Name/Ballot Question: ETHAN STRIMLING FOR MAYOR	
Date: 09/26/2019	Payee Name and Address: THE TCV GROUP, LLC 201 US ROUTE ONE #131 SCARBOROUGH, ME 04074	Amount 4,664.00
Type: WEB	Remarks (Required): FACEBOOK ADVERTISING	
<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	Candidate Name/Ballot Question: ETHAN STRIMLING FOR MAYOR	
Date:	Payee Name and Address:	Amount
Type:	Remarks (Required):	
<input type="checkbox"/> Support <input type="checkbox"/> Oppose	Candidate Name/Ballot Question:	
Date:	Payee Name and Address:	Amount
Type:	Remarks (Required):	
<input type="checkbox"/> Support <input type="checkbox"/> Oppose	Candidate Name/Ballot Question:	
Total expenditures this page only ⇒ (combined totals from all Schedule B pages must be listed on Schedule F)		\$4,684.16

AC/BQC Name: UNITE PORTLAND

**SCHEDULE F
SUMMARY SCHEDULE**

CASH ACTIVITY

Receipts	Total for this Period
1. Cash Contributions (Schedule A)	\$18,950
2. Other Cash Receipts (interest, etc.)	-
3. Loans (Schedule C)	-
4. Total Receipts (lines 1 + 2 + 3)	\$18,950
Expenditures	Total for this Period
5. Expenditures to Support or Oppose (Schedule B)	\$ 14,664
6. Operating Expenditures (Schedule B-1)	-
7. Loan Repayment (Schedule C)	-
8. Total Payments (lines 5 + 6 + 7)	\$14,664

CASH SUMMARY

	Total for This Period
9. Cash Balance at Beginning of Period	\$ -
10. Plus Total Receipts This Period (line 4 above)	18,950
11. Minus Total Payments This Period (line 8 above)	(14,664)
12. Cash Balance at End of Period	4,286

OTHER ACTIVITY

	Total for This Period
13. In-Kind Contributions (Schedule A-1)	\$ 61
14. Total Loan Balance at End of Period (Schedule C)	-
15. Total Unpaid Debts at End of Period (Schedule D)	-

Exh. K

Ad Library



All Ads

Unite Portland



Unite Portland
@UnitePortland
Political Organization 268 likes

Page transparency

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Page created **Aug 16, 2019**

Page name has not changed

Primary country location for people who manage this Page includes: **United States (1)**

29 results

Showing ads from Unite Portland.

View: All Ads Issue, Electoral or Political

Filter By: United States All Impressions All Platforms

Launched November 2019

- Inactive
- Nov 4, 2019 - Dec 9, 2019
- ID: 1686231884842070
-

- Inactive
- Nov 2, 2019 - Nov 5, 2019
- ID: 2748320345187158
-

- Inactive
- Nov 2, 2019 - Nov 5, 2019
- ID: 2487921621531305
-

About social issues, elections or politics

UNITE PORTLAND
Unite Portland
Sponsored • Paid for by Unite Portland

IMPORTANT: Ethan Strimling's former campaign treasurer on why she won't vote for him this time- "Ethan has ushered in an unfortunate new political era where he and his core supporters eagerly embrace...



After Two Decades of Support, Ethan Strimling has lost my vote – Unite...
After Two Decades of Support, Ethan Strimling has lost my vote By Dory...
UNITEPORTLAND.ORG

[See Ad Details](#)

● Inactive
Nov 2, 2019 - Nov 5, 2019
ID: 1006090496404046

About social issues, elections or politics

UNITE PORTLAND
Unite Portland
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"Ethan Strimling has been running a cynical, fear-based campaign where emails go out daily, backed up by social media trolls, falsely attacking individuals based on their profession or affiliations. This i...

About social issues, elections or politics

UNITE PORTLAND
Unite Portland
Sponsored • Paid for by Unite Portland

The Portland Press Herald makes it clear -- it's time for a new mayor.

[See Ad Details](#)

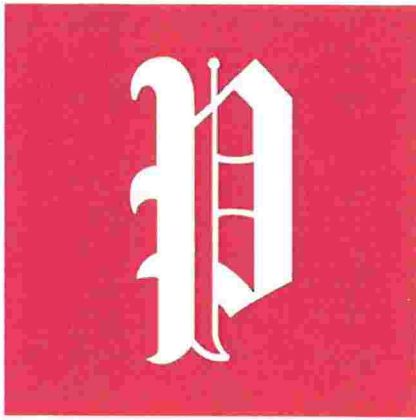
About social issues, elections or politics

UNITE PORTLAND
Unite Portland
Sponsored • Paid for by Unite Portland

When Ethan ran for mayor, he said the mayor and city council needed to get developers to the table. After being in charge for 4 years, he now says developers have too much influence. Which Ethan are we supposed to...

Which Ethan should we believe?

[See Ad Details](#)



Letter to the Editor:

Why I'm endorsing...

On Nov. 5, I will be ranking both Spencer...
PRESSHERALD.COM

[Learn More](#)

[See Ad Details](#)

Launched October 2019

● Inactive

Oct 30, 2019 - Nov 5, 2019
ID: 712128002627104



About social issues, elections or politics



Unite Portland

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"Ethan may go around touting his record on school funding or endorsements he's received, but if you're completing a four-year term as our mayor and you've only gone out of your way to meet a single public school...

● Inactive

Oct 27, 2019 - Nov 5, 2019
ID: 2755597117786381



About social issues, elections or politics



Unite Portland

Sponsored • Paid for by Unite Portland

Ethan claimed he'd "never said" we should get rid of the City Manager. But video from an event just a few weeks earlier caught him in a lie.

● Inactive

Oct 27, 2019 - Nov 5, 2019
ID: 2532013813550008



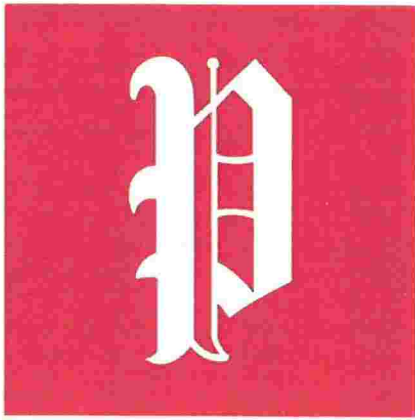
About social issues, elections or politics



Unite Portland

Sponsored • Paid for by Unite Portland

Ever since Ethan Strimling became mayor, our politics have become nasty and dysfunctional. It's time for a change.



Letter to the Editor:
Mayor doesn't kno...
At the Portland
Education Associatio...
PRESSHERALD.COM

[Learn More](#)

[See Ad Details](#)

[See Ad Details](#)

[See Ad Details](#)

● Inactive

Oct 24, 2019 - Nov 5, 2019
ID: 1352575054915883



About social issues,
elections or politics



Unite Portland

Sponsored • Paid for by Unite
Portland

It's time for a change. It's time
for a new mayor in Portland.

[See Ad Details](#)

● Inactive

Oct 24, 2019 - Nov 5, 2019
ID: 542855066531684



About social issues,
elections or politics



Unite Portland

Sponsored • Paid for by Unite
Portland

It's time for a change. It's time
for a new mayor in Portland.

[See Ad Details](#)

● Inactive

Oct 24, 2019 - Nov 5, 2019
ID: 776850766097188



About social issues,
elections or politics



Unite Portland

Sponsored • Paid for by Unite
Portland

It's time to put an end to Ethan's
drama and broken promises. It's
time for a new mayor.

[See Ad Details](#)

● Inactive
Oct 22, 2019 - Nov 5, 2019
ID: 409261813326590



About social issues,
elections or politics

UNITE
PORTLAND
Unite Portland
Sponsored • Paid for by Unite
Portland

It's time for a new mayor.

[See Ad Details](#)

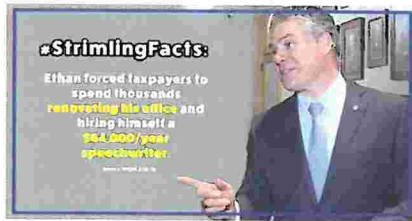
● Inactive
Oct 15, 2019 - Oct 25, 2019
ID: 536520163764489



About social issues,
elections or politics

UNITE
PORTLAND
Unite Portland
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Portland

Results that matter require
priorities that make sense. But
when Ethan took office, his
focus wasn't on Portland - it
was on remodeling his office and
hiring himself a
speechwriter. Please be sure t...



[See Ad Details](#)

● Inactive
Oct 10, 2019 - Oct 13, 2019
ID: 1378149459016086

About social issues,
elections or politics

UNITE
PORTLAND
Unite Portland
Sponsored • Paid for by Unite
Portland

As a previous supporter of
Ethan Strimling, Cheryl Leeman
understands we need to make a
change:"He has caused
disruption, he has been divisive,
and he has not kept any of his
promises. I'm urging everybod...

Cheryl Leeman

[See Ad Details](#)

2

● Inactive
Oct 7, 2019 - Oct 12, 2019
ID: 766961200409909

About social issues,
elections or politics

UNITE
PORTLAND
Unite Portland
Sponsored • Paid for by Unite
Portland

Will Bradford is a musician and
artist in Portland:"Ever since
Ethan Strimling became mayor,
our politics have become nasty
and dysfunctional. it's time for a
new mayor."

● Inactive
Oct 7, 2019 - Oct 8, 2019
ID: 2463004783826400

About social issues,
elections or politics

UNITE
PORTLAND
Unite Portland
Sponsored • Paid for by
Unite Portland

As a renter, Pearl has seen the
cost of living in Portland
continue to rise since Ethan
Strimling became mayor.
People are being pushed out
of their neighborhoods, and

Will Bradford

Pearl

[See Ad Details](#)

[See Ad Details](#)

Launched September 2019

● Inactive

Sep 30, 2019 - Oct 5, 2019
ID: 2320987691487391

About social issues, elections or politics



Unite Portland

Sponsored • Paid for by Unite Portland

"But the progressives who think that that they've seen the real Strimling should talk to the fans of the 2011 Ethan – who wanted to teach us how to say "yes please" and "thank you" to developers – or the "Kumbaya..."



● Inactive

Sep 30, 2019 - Oct 4, 2019
ID: 392455718105861

About social issues, elections or politics



Unite Portland

Sponsored • Paid for by Unite Portland

Dana Totman is an affordable housing advocate who knows Portland needs a fresh approach. It's time for a change.

[See Ad Details](#)

● Inactive

Sep 27, 2019 - Oct 4, 2019
ID: 595191434218704

About social issues, elections or politics



Unite Portland

Sponsored • Paid for by Unite Portland

"It's time for a new mayor." Joan Gildart was a teacher in Portland Public Schools for more than 40 years.

[See Ad Details](#)

The View From Here: The many faces of Ethan Strimling

Portland's mayor has an uncanny ability to shape his persona to the times.

PRESSHERALD.COM

See Ad Details

Inactive

Started running on Sep 1, 2019
ID: 2549203571793765

About social issues, elections or politics



Unite Portland

Sponsored • Paid for by Unite Portland

When Ethan Strimling ran for mayor, he said he'd be the "Uniter in Chief." That's not what he's done. It's time for a new mayor.

See Ad Details

Inactive

Started running on Sep 1, 2019
ID: 446180419323486

About social issues, elections or politics

This ad has multiple versions.



Unite Portland

Sponsored • Paid for by Unite Portland

Solving Portland's challenges requires steady, collaborative leadership. It's time for a change. It's time for a new mayor.

See Ad Details

Inactive

Started running on Sep 23, 2019 - Oct 4, 2019
ID: 940653736273478

About social issues, elections or politics



Unite Portland

Sponsored • Paid for by Unite Portland, PO Box 5200...

"It's time for a new mayor." Joan Gildart was a teacher in Portland Public Schools for more than 40 years.

See Ad Details

Inactive

Started running on Sep 1, 2019
ID: 634849580371725

About social issues, elections or politics

Inactive

Started running on Sep 16, 2019 - Sep 30, 2019
ID: 389451911743013

About social issues, elections or politics

This ad has multiple versions.

UNITE PORTLAND
Unite Portland
Sponsored • Paid for by Unite Portland, PO Box 5200...

Jon Hinck has a long record of working for progressive causes, and he's one of many Portlanders who understand it's time for a change. It's time for a new mayor.

UNITE PORTLAND
Unite Portland
Sponsored • Paid for by Unite Portland, PO Box 5200...

Jon Hinck is a former City Councilor and represented Portland in the Maine Legislature. He's got a long record of working for progressive causes, and he's one of many Portlanders who...

Jon Hinck - Unite Portland

[See Ad Details](#)

[See Ad Details](#)

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