



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

To: Commissioners  
From: Erin Gordon, Candidate Registrar  
Date: February 16, 2023  
Re: Request by Representative Shelley Rudnicki for Investigation of Robert Sezak's  
Campaign Spending

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Robert Sezak was a 2022 candidate for House district 67. His opponent, Representative Shelley Rudnicki, has filed a complaint alleging that the funds reported by Mr. Sezak as payment to Frame media for mailers were not actually spent for that purpose.

### **LEGAL REQUIREMENTS**

Under the Maine Clean Election Act (MCEA), candidates must spend public campaign funds received from the State for campaign-related purposes. 21-A M.R.S. § 1125(6). The Commission's 2022 Expenditure Guidelines specify that a candidate may not use MCEA funds to assist any other candidate.

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

### **DISCUSSION**

In the attached complaint dated January 12, 2023, Rep. Rudnicki alleges that despite Mr. Sezak's reported expenditures to Frame Media for mailers, local friends received mailers only from third parties, not from the Sezak campaign directly. She states that "Not one piece of mail came out from Robert through Frame media."

Mr. Sezak reported four separate payments to Frame Media Strategies:

- \$526.00 on June 13, 2022, for “Payment of invoice for palm cards;”
- \$762.84 on July 29, 2022, for “Palm cards and digital video;”
- \$7,341.00 on September 9, 2022, for “Mailers to households;” and
- \$1,764.00 on October 17, 2022, for “Mailings to voters.”

During a preliminary investigation into this complaint, Commission staff sent the attached letters to Mr. Sezak and David Loughran of Frame Media Strategies, asking for records of the mailings, including proof of mailing from the United States Postal Service (USPS). Mr. Loughran’s response is included in the attachments directly after the staff letters. Mr. Loughran provided four USPS postage statements, artwork proofs for the four mailings, and invoices to Mr. Sezak that are marked paid. The amounts in the invoices correspond to the expenditure amounts reported by Mr. Sezak. To preserve the privacy of district residents that received the mailings, the Commission staff has redacted the recipient names and addresses that were shown in the artwork proofs.

The Commission’s executive director conducted a short interview of Mr. Loughran to better understand the postage statements. The mailings were printed by Journeyman Press of Newburyport, Massachusetts. According to Mr. Loughran, Journeyman conducted a sorting procedure at its facility to obtain the best mail rate possible and entered the details of the mail job into a “business customer gateway” software application of the USPS. Journeyman then delivered the mailings in trays to the postal sorting center in Portland, Maine. The USPS employee who received the mailings entered their initials and the date and time when the mailings were received. Those details are shown in the shaded region in the upper right corner of each postage statement (*e.g.*, “Processed By: TSS on 09/30/2022 05:26:53 PM”). The four “Mailing Dates” listed on the postage statements are 09/30/22, 10/20/22, 10/27/22, and 10/31/22.

Mr. Sezak submitted a letter stating that every mail piece he purchased was sent to voters in his district, and the complaint is without basis. He included one-sided images of four mailers that were received by voters in the district. The staff is providing Mr. Sezak’s complete response in the Commissioners’ packets for the February 28<sup>th</sup> meeting, but the recipients names and

addresses are redacted from the materials that are posted on the Commission website.

### **STAFF RECOMMENDATION**

Rep. Rudnicki alleges in her complaint that Frame sent no mailings into the House district and suggests that the funds paid by Mr. Sezak to Frame were “pooled” to benefit candidates in other districts. After reviewing the materials submitted by Frame Media Strategies and Mr. Sezak, staff does not find evidence that Mr. Sezak’s funds were improperly spent. Nor do we find any indication that one MCEA candidate’s funds were diverted by Frame Media to support another candidate. Given the evidence from the candidate and the mail vendor that the mailings were delivered to the U.S. Post Office in Portland and received, the Commission staff does not believe the complaint has shown sufficient grounds for further investigation. We do not recommend that any violation of MCEA Expenditure Guidelines or statute be found in this matter.

Martha,

As per our conversation I would like to file a complaint against Robert Sezak of Fairfield, Maine. Robert was my opponent in the last election.

According to Roberts ethics filings he sent \$7341 to Frame media for Lit in his Sept. filing and on Oct. 17 he sent an additional \$1764. Not one piece of mail came out from Robert through Frame media. In a subsequent report Robert has postcards through a local vendor that did get sent.

I had friends send me anything they received. I have 3 mailers that were sent by 3rd parties, not his own campaign. One from Citizens Who Support Maine's Public Schools PAC and 2 from The Maine Democratic Party.

Taxpayer money AKA Clean Election monies is not supposed to be pooled and is supposed to be used in the district of the candidate. That is not the case here and I believe it has happened across the state.

Thank You  
Shelley Rudnicki

*Shelley Rudnicki 1/12/23*





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

January 13, 2023

*By Email and Regular Mail*

Mr. David Loughran  
Frame Strategies  
188 State Street, Suite 202  
Portland, Maine 04102

Dear Mr. Loughran,

The Maine Ethics Commission received a complaint asserting that a 2022 candidate for the Maine House of Representatives, Robert Sezak, paid money to Frame Strategies for literature but no mailings were delivered in his district. The Commission staff is gathering preliminary information to assist the members of the Commission in determining whether any further investigation is necessary. We ask that Frame Strategies provide records indicating:

- the number of mailings that Frame Strategies prepared in 2022 for Mr. Sezak,
- an image for each mailing,
- the cost of each mailing,
- payments received from Mr. Sezak,
- for each mailing, the number of pieces sent by U.S. Mail, and
- for each mailing, a record that the mailings were deposited in the U.S. Postal System or a record that Frame Strategies or a subcontractor was charged for postage.

Our office would appreciate it if Frame Strategies could provide these records within two weeks, if possible. Thank you very much for your cooperation.

Sincerely

A handwritten signature in black ink that reads 'Jonathan Wayne'.

Jonathan Wayne  
Executive Director

cc: Robert Sezak (by email)



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

**Sent by Email and USPS**

January 25, 2023

Mr. Robert Sezak  
18 Bunker Avenue  
Fairfield, ME 04937

Re: Complaint against House campaign of Robert Sezak

Dear Mr. Sezak:

The Maine Ethics Commission received the enclosed request for investigation from Representative Shelley Rudnicki, which alleges that the monies paid to Frame Media Strategies by your campaign did not result in any mailers. She contends that Frame pooled money received from you and used it for other purposes. The purpose of this letter is to invite you to respond and to provide any information that you believe is relevant.

**Commission's Decision Whether to Investigate**

The Commission will consider this matter at a public meeting on February 28, 2023. The Commission staff recommends that you participate in the meeting to respond to the request for investigation and to answer any questions from the Commissioners. The meeting will begin at 9:00 a.m.

**Relevant Law**

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

Requirement to Spend MCEA Funds for Campaign-Related Purposes. Under the Maine Clean Election Act (MCEA), candidates must spend public campaign funds received from the State for campaign-related purposes. 21-A M.R.S. § 1125(6). The Commission's 2022 Expenditure Guidelines specify that a candidate may not use MCEA funds to assist any other candidate.

Robert Sezak  
Page 2  
January 25, 2023

### **Request for Response**

Please submit a written response to the request for investigation by Wednesday, February 10, 2023. You are welcome to submit any information you believe is relevant to the Commission's decision whether to investigate. In addition, the Commission staff recommends addressing the following points:

- What details do you have of the mailers and other literature produced by Frame for your campaign?
- Please submit whatever evidence that is feasible demonstrating that residents of your House district actually received mailings. It would be helpful if you could bring any physical copies to the meeting.

Thank you for your cooperation with this request. The Commission looks forward to receiving your response on or before February 10, 2023. Please let me know if you have any questions.

Sincerely,



Erin Gordon  
Candidate Registrar

cc: Hon. Shelley Rudnicki (by email and regular mail)

Martha,

As per our conversation I would like to file a complaint against Robert Sezak of Fairfield, Maine. Robert was my opponent in the last election.

According to Roberts ethics filings he sent \$7341 to Frame media for Lit in his Sept. filing and on Oct. 17 he sent an additional \$1764. Not one piece of mail came out from Robert through Frame media. In a subsequent report Robert has postcards through a local vendor that did get sent.

I had friends send me anything they received. I have 3 mailers that were sent by 3rd parties, not his own campaign. One from Citizens Who Support Maine's Public Schools PAC and 2 from The Maine Democratic Party.

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Thank You  
Shelley Rudnicki

*Shelley Rudnicki 1/12/23*

# Postage Statement—USPS Marketing Mail

Transaction Number: 202227316365373 M1	CAPS / EPS Transaction Number: 225701776	Postage Statement Number: 505102587
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Mailing Group	Mailing Group ID <b>376446065</b>	Mailing Job Number <b>9506ZZZ1</b>	Open Date <b>09-22-2022</b>
	Preparer <b>THE JOURNEYMAN PRESS</b>	Origin <b>Mail.dat</b>	Close Date
	Job Description <b>119506ZZZ1</b>		

Mailer	Permit Holder's Name and Address and Email Address, if Any  <b>JOURNEYMAN PRESS 11 MALCOLM HOYT DR PO BOX 914 NEWBURYPORT, MA 01950-4017 Contact Name: JOHN PETRUZZIELLO (978)463-6702 JOHNP@JPRESS.COM</b>	Name and Address of Mailing Agent (If other than permit holder)  <b>THE JOURNEYMAN PRESS 11 MALCOLM HOYT DR NEWBURYPORT, MA 01950-4017</b>  CRID: 3937726	Name and Address of Individual or Organization for Which Mailing is Prepared (If other than permit holder)  <b>ROBERT SEZAK 18 BUNKER AVE FAIRFIELD, ME 04937-1501</b>  CRID: 6473028
	CAPS Customer Ref. No: 119506ZZZ1  CRID: 3937726		

Mailing	Post Office of Mailing <b>BANGOR ME 04401 9998</b>	Processing Category <b>Letters</b>	Mailer's Mailing Date <b>09/30/22</b>	Federal Agency Cost Code	Statement Seq. No.	No. & Type of Containers  Sacks: 0 1 ft. Letter Trays: 2 2 ft. Letter Trays: 0 EMM Letter Trays: 2 Flat Trays: 0 Pallets: 0 Other: 0
	Type of Postage <b>Permit Imprint</b>		SSF Transaction ID #		Total # of Pieces in Mailing <b>2,250</b>	
			Weight of a Single Piece <b>0.0188 lbs.</b>	Combined Mailing	Total Weight <b>42.3000 lbs.</b>	
	Permit # <b>439</b>	For Mail Enclosed Within Another Class <input type="checkbox"/> Bound Printed Matter <input type="checkbox"/> Library Mail <input type="checkbox"/> Periodicals <input type="checkbox"/> Media Mail		[ ] Mailpiece is a product sample. _____ % Samples		
	For Automation Rate Pieces, Enter Date of Address Matching and Coding ____/____/____	For Carrier Route Pieces, Enter Date of Address Matching and Coding ____/____/____	For Carrier Route Pieces, Enter Date of Carrier Route Sequencing ____/____/____	For Pieces Bearing a Simplified Address Enter Date of Delivery Statistics File or Alternative Method ____/____/____		
Move Update Method: <b>Alternative Address Format</b>						
This is a Political Campaign Mailing Yes			This is Official Election Mail No		[ ] Letter-size or flat mailpiece contains DVD/CD or other disc.	

Postage	Parts Completed <b>A, B</b>		
	<b>Subtotal Postage (Add parts totals)</b>	<b>\$595.17</b>	
	Complete if the mailing includes pieces bearing metered/PC Postage or precanceled stamps. Rate at Which Postage Affixed (Check one) <input type="checkbox"/> Correct <input type="checkbox"/> Lowest <input type="checkbox"/> Neither	_____ pcs. x \$ _____ = <b>Postage Affixed</b>	<b>\$0.000</b>
	Incentive/Discount Flat Dollar Amount	_____	<b>\$-6.69</b>
	Fee	_____	<b>\$0.00</b>
	<b>Net Postage Due</b>		<b>\$595.17</b>
	<b>For USPS Use Only: Additional Postage Payment (State reason)</b>		
<b>Total USPS Adjusted Postage</b>		<b>\$595.17</b>	

**Certification**

Incentive/Discount Claimed: N/A      Type of Fee: N/A

The mailer certifies acceptance of liability for and agreement to pay any revenue deficiencies assessed on this mailing, subject to appeal. If an agent certifies that he or she is authorized on behalf of the mailer then that mailer is bound by the certification and agrees to pay any deficiencies. In addition, agents may be liable for any deficiencies resulting from matters within their responsibility, knowledge, or control. The mailer hereby certifies that all information furnished on this form is accurate, truthful, and complete; that the mail and the supporting documentation comply with all postal standards and that the mailing qualifies for the prices and fees claimed; and that the mailing does not contain any matter prohibited by law or postal regulation. I understand that anyone who furnishes false or misleading information on this form or who omits information requested on this form may be subject to criminal and/or civil penalties, including fines and imprisonment.

Privacy Notice: For information regarding our Privacy Policy visit [www.usps.com](http://www.usps.com)

# Part A

## Automation Letters

### Letters 3.5 oz (0.2188 lbs) or less

Entry	Price	Price	No. of Pieces	Subtotal Postage	Discount Total*	Fee Total	Total Postage	
Category								
A7	DSCF	5-Digit	\$0.266	2,152	\$572.4320	\$-6.4560	\$0.0000	\$565.9760
A8	DSCF	AADC	\$0.298	78	\$23.2440	\$-0.2340	\$0.0000	\$23.0100

A9	<b>Part A Total (Add lines A1-A8)</b>						\$588.9860
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## Full Service Intelligent Mail Option

A10	DISPLAY ONLY Letters - Number of Pieces that Comply 2230.0 x 0.003 =						\$6.6900
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\* May contain both Full Service Intelligent Mail and other discounts

# Part B

## Nonautomation Letters

### Machinable Letters 3.5 oz (0.2188 lbs) or less

Entry	Price	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage	
Category								
B5	DSCF	AADC	\$0.309	20	\$6.1800	\$0.0000	\$0.0000	\$6.1800

B28	<b>Part B Total (Add lines B1 - B27)</b>						\$6.1800
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This postage statement was verified and accepted under the PostalOne! program. No postal signature or round stamp is required.

# Postage Statement—USPS Marketing Mail

Transaction Number: 202229315420349 M1	CAPS / EPS Transaction Number: 232763482	Postage Statement Number: 508283755
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<b>Mailing Group</b>	Mailing Group ID <b>379225328</b>	Mailing Job Number <b>9506ZZZ3</b>	Open Date <b>10-12-2022</b>
	Preparer <b>THE JOURNEYMAN PRESS</b>	Origin <b>Mail.dat</b>	Close Date
	Job Description <b>119506ZZZ3</b>		

<b>Mailer</b>	Permit Holder's Name and Address and Email Address, if Any  <b>JOURNEYMAN PRESS 11 MALCOLM HOYT DR PO BOX 914 NEWBURYPORT, MA 01950-4017 Contact Name: JOHN PETRUZZIELLO (978)463-6702 JOHNP@JPRESS.COM</b>	Name and Address of Mailing Agent <i>(If other than permit holder)</i>  <b>THE JOURNEYMAN PRESS 11 MALCOLM HOYT DR NEWBURYPORT, MA 01950-4017</b>  CRID: 3937726	Name and Address of Individual or Organization for Which Mailing is Prepared <i>(If other than permit holder)</i>  <b>ROBERT SEZAK 18 BUNKER AVE FAIRFIELD, ME 04937-1501</b>  CRID: 6473028
	CAPS Customer Ref. No: 119506ZZZ3  CRID: 3937726		

<b>Mailing</b>	Post Office of Mailing <b>BANGOR ME 04401 9998</b>	Processing Category <b>Letters</b>	Mailer's Mailing Date <b>10/20/22</b>	Federal Agency Cost Code	Statement Seq. No.	No. & Type of Containers  Sacks: 0 1 ft. Letter Trays: 2 2 ft. Letter Trays: 0 EMM Letter Trays: 2 Flat Trays: 0 Pallets: 0 Other: 0	
	Type of Postage <b>Permit Imprint</b>		SSF Transaction ID #		Total # of Pieces in Mailing <b>2,250</b>		
			Weight of a Single Piece <b>0.0188 lbs.</b>	Combined Mailing	Total Weight <b>42.3000 lbs.</b>		
	Permit # <b>439</b>	For Mail Enclosed Within Another Class <input type="checkbox"/> Bound Printed Matter <input type="checkbox"/> Library Mail <input type="checkbox"/> Periodicals <input type="checkbox"/> Media Mail		[ ] Mailpiece is a product sample. _____ % Samples			
	For Automation Rate Pieces, Enter Date of Address Matching and Coding <b>10/06/22</b>	For Carrier Route Pieces, Enter Date of Address Matching and Coding <b>10/06/22</b>	For Carrier Route Pieces, Enter Date of Carrier Route Sequencing ___/___/___	For Pieces Bearing a Simplified Address Enter Date of Delivery Statistics File or Alternative Method ___/___/___			
	Move Update Method: <b>Alternative Address Format</b>						
This is a Political Campaign Mailing Yes		This is Official Election Mail No		[ ] Letter-size or flat mailpiece contains DVD/CD or other disc.			

<b>Postage</b>	Parts Completed <b>A, B</b>		
	<b>Subtotal Postage (Add parts totals)</b>	<b>\$594.88</b>	
	Complete if the mailing includes pieces bearing metered/PC Postage or precanceled stamps. Rate at Which Postage Affixed (Check one) <input type="checkbox"/> Correct <input type="checkbox"/> Lowest <input type="checkbox"/> Neither	_____ pcs. x \$ _____ = <b>Postage Affixed</b>	<b>\$0.000</b>
	Incentive/Discount Flat Dollar Amount		<b>\$-6.69</b>
	Fee		<b>\$0.00</b>
	<b>Net Postage Due</b>		<b>\$594.88</b>
	<b>For USPS Use Only: Additional Postage Payment (State reason)</b>		
<b>Total USPS Adjusted Postage</b>		<b>\$594.88</b>	

**Certification**

Incentive/Discount Claimed: N/A      Type of Fee: N/A

The mailer certifies acceptance of liability for and agreement to pay any revenue deficiencies assessed on this mailing, subject to appeal. If an agent certifies that he or she is authorized on behalf of the mailer then that mailer is bound by the certification and agrees to pay any deficiencies. In addition, agents may be liable for any deficiencies resulting from matters within their responsibility, knowledge, or control. The mailer hereby certifies that all information furnished on this form is accurate, truthful, and complete; that the mail and the supporting documentation comply with all postal standards and that the mailing qualifies for the prices and fees claimed; and that the mailing does not contain any matter prohibited by law or postal regulation. I understand that anyone who furnishes false or misleading information on this form or who omits information requested on this form may be subject to criminal and/or civil penalties, including fines and imprisonment.

Privacy Notice: For information regarding our Privacy Policy visit [www.usps.com](http://www.usps.com)

# Part A

Automation Letters

Letters 3.5 oz (0.2188 lbs) or less

Entry	Price	Price	No. of Pieces	Subtotal Postage	Discount Total*	Fee Total	Total Postage	
Category								
A7	DSCF	5-Digit	\$0.266	2,161	\$574.8260	\$-6.4830	\$0.0000	\$568.3430
A8	DSCF	AADC	\$0.298	69	\$20.5620	\$-0.2070	\$0.0000	\$20.3550

A9	<b>Part A Total (Add lines A1-A8)</b>						\$588.6980
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Full Service Intelligent Mail Option

A10	DISPLAY ONLY Letters - Number of Pieces that Comply 2230.0 x 0.003 =						\$6.6900
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\* May contain both Full Service Intelligent Mail and other discounts

# Part B

Nonautomation Letters

Machinable Letters 3.5 oz (0.2188 lbs) or less

Entry	Price	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage	
Category								
B5	DSCF	AADC	\$0.309	20	\$6.1800	\$0.0000	\$0.0000	\$6.1800

B28	<b>Part B Total (Add lines B1 - B27)</b>						\$6.1800
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This postage statement was verified and accepted under the PostalOne! program. No postal signature or round stamp is required.



# Postage Statement—USPS Marketing Mail

Transaction Number: 202230014584213 M1	CAPS / EPS Transaction Number: 235260562	Postage Statement Number: 509428576
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Mailing Group	Mailing Group ID <b>380165987</b>	Mailing Job Number <b>9506ZZZ4</b>	Open Date <b>10-19-2022</b>
	Preparer <b>THE JOURNEYMAN PRESS</b>	Origin <b>Mail.dat</b>	Close Date
	Job Description <b>119506ZZZ4</b>		

Mailer	Permit Holder's Name and Address and Email Address, if Any  <b>JOURNEYMAN PRESS 11 MALCOLM HOYT DR PO BOX 914 NEWBURYPORT, MA 01950-4017 Contact Name: JOHN PETRUZZIELLO (978)463-6702 JOHNP@JPRESS.COM</b>	Name and Address of Mailing Agent (If other than permit holder)  <b>THE JOURNEYMAN PRESS 11 MALCOLM HOYT DR NEWBURYPORT, MA 01950-4017</b>  CRID: 3937726	Name and Address of Individual or Organization for Which Mailing is Prepared (If other than permit holder)  <b>ROBERT SEZAK 18 BUNKER AVE FAIRFIELD, ME 04937-1501</b>  CRID: 6473028
	CAPS Customer Ref. No: 119506ZZZ4  CRID: 3937726		

Mailing	Post Office of Mailing <b>BANGOR ME 04401 9998</b>	Processing Category <b>Letters</b>	Mailer's Mailing Date <b>10/27/22</b>	Federal Agency Cost Code	Statement Seq. No.	No. & Type of Containers  Sacks: 0 1 ft. Letter Trays: 2 2 ft. Letter Trays: 0 EMM Letter Trays: 2 Flat Trays: 0 Pallets: 0 Other: 0	
	Type of Postage <b>Permit Imprint</b>		SSF Transaction ID #		Total # of Pieces in Mailing <b>2,250</b>		
			Weight of a Single Piece <b>0.0188 lbs.</b>	Combined Mailing	Total Weight <b>42.3000 lbs.</b>		
	Permit # <b>439</b>	For Mail Enclosed Within Another Class <input type="checkbox"/> Bound Printed Matter <input type="checkbox"/> Library Mail <input type="checkbox"/> Periodicals <input type="checkbox"/> Media Mail		[ ] Mailpiece is a product sample. _____ % Samples			
	For Automation Rate Pieces, Enter Date of Address Matching and Coding <b>10/19/22</b>	For Carrier Route Pieces, Enter Date of Address Matching and Coding <b>10/19/22</b>	For Carrier Route Pieces, Enter Date of Carrier Route Sequencing ___/___/___	For Pieces Bearing a Simplified Address Enter Date of Delivery Statistics File or Alternative Method ___/___/___			
	Move Update Method: <b>Alternative Address Format</b>						
This is a Political Campaign Mailing Yes		This is Official Election Mail No		[ ] Letter-size or flat mailpiece contains DVD/CD or other disc.			

Postage	Parts Completed <b>A, B</b>		
	<b>Subtotal Postage (Add parts totals)</b>	<b>\$595.20</b>	
	Complete if the mailing includes pieces bearing metered/PC Postage or precanceled stamps. Rate at Which Postage Affixed (Check one) <input type="checkbox"/> Correct <input type="checkbox"/> Lowest <input type="checkbox"/> Neither	_____ pcs. x \$ _____ = <b>Postage Affixed</b>	<b>\$0.000</b>
	Incentive/Discount Flat Dollar Amount		<b>\$-6.69</b>
	Fee		<b>\$0.00</b>
	<b>Net Postage Due</b>		<b>\$595.20</b>
	<b>For USPS Use Only: Additional Postage Payment (State reason)</b>		
<b>Total USPS Adjusted Postage</b>		<b>\$595.20</b>	

**Certification** Incentive/Discount Claimed: N/A Type of Fee: N/A  
The mailer certifies acceptance of liability for and agreement to pay any revenue deficiencies assessed on this mailing, subject to appeal. If an agent certifies that he or she is authorized on behalf of the mailer then that mailer is bound by the certification and agrees to pay any deficiencies. In addition, agents may be liable for any deficiencies resulting from matters within their responsibility, knowledge, or control. The mailer hereby certifies that all information furnished on this form is accurate, truthful, and complete; that the mail and the supporting documentation comply with all postal standards and that the mailing qualifies for the prices and fees claimed; and that the mailing does not contain any matter prohibited by law or postal regulation. I understand that anyone who furnishes false or misleading information on this form or who omits information requested on this form may be subject to criminal and/or civil penalties, including fines and imprisonment.  
Privacy Notice: For information regarding our Privacy Policy visit [www.usps.com](http://www.usps.com)

# Part A

## Automation Letters

### Letters 3.5 oz (0.2188 lbs) or less

Entry	Price	Price	No. of Pieces	Subtotal Postage	Discount Total*	Fee Total	Total Postage	
Category								
A7	DSCF	5-Digit	\$0.266	2,151	\$572.1660	\$-6.4530	\$0.0000	\$565.7130
A8	DSCF	AADC	\$0.298	79	\$23.5420	\$-0.2370	\$0.0000	\$23.3050

A9	<b>Part A Total (Add lines A1-A8)</b>							\$589.0180
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### Full Service Intelligent Mail Option

A10	DISPLAY ONLY Letters - Number of Pieces that Comply 2230.0 x 0.003 =							\$6.6900
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\* May contain both Full Service Intelligent Mail and other discounts

# Part B

## Nonautomation Letters

### Machinable Letters 3.5 oz (0.2188 lbs) or less

Entry	Price	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage	
Category								
B5	DSCF	AADC	\$0.309	20	\$6.1800	\$0.0000	\$0.0000	\$6.1800

B28	<b>Part B Total (Add lines B1 - B27)</b>							\$6.1800
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This postage statement was verified and accepted under the PostalOne! program. No postal signature or round stamp is required.

# Postage Statement—USPS Marketing Mail

Transaction Number: 202230411565367 M1	CAPS / EPS Transaction Number: 236431137	Postage Statement Number: 510522187
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<b>Mailing Group</b>	Mailing Group ID <b>381144255</b>	Mailing Job Number <b>9506ZZZ5</b>	Open Date <b>10-26-2022</b>
	Preparer <b>THE JOURNEYMAN PRESS</b>	Origin <b>Mail.dat</b>	Close Date
	Job Description <b>119506ZZZ5</b>		

<b>Mailer</b>	Permit Holder's Name and Address and Email Address, if Any  <b>JOURNEYMAN PRESS 11 MALCOLM HOYT DR PO BOX 914 NEWBURYPORT, MA 01950-4017 Contact Name: JOHN PETRUZZIELLO (978)463-6702 JOHNP@JPRESS.COM</b>	Name and Address of Mailing Agent <i>(If other than permit holder)</i>  <b>THE JOURNEYMAN PRESS 11 MALCOLM HOYT DR NEWBURYPORT, MA 01950-4017</b>  CRID: 3937726	Name and Address of Individual or Organization for Which Mailing is Prepared <i>(If other than permit holder)</i>  <b>ROBERT SEZAK 18 BUNKER AVE FAIRFIELD, ME 04937-1501</b>  CRID: 6473028
	CAPS Customer Ref. No: 119506ZZZ5  CRID: 3937726		

<b>Mailing</b>	Post Office of Mailing <b>PORTLAND ME 04101-9651</b>	Processing Category <b>Letters</b>	Mailer's Mailing Date <b>10/31/22</b>	Federal Agency Cost Code	Statement Seq. No.	No. & Type of Containers  Sacks: 0 1 ft. Letter Trays: 2 2 ft. Letter Trays: 0 EMM Letter Trays: 2 Flat Trays: 0 Pallets: 0 Other: 0	
	Type of Postage <b>Permit Imprint</b>		SSF Transaction ID #		Total # of Pieces in Mailing <b>2,250</b>		
			Weight of a Single Piece <b>0.0188 lbs.</b>	Combined Mailing	Total Weight <b>42.3000 lbs.</b>		
	Permit # <b>439</b>	For Mail Enclosed Within Another Class <input type="checkbox"/> Bound Printed Matter <input type="checkbox"/> Library Mail <input type="checkbox"/> Periodicals <input type="checkbox"/> Media Mail		[ ] Mailpiece is a product sample. _____ % Samples			
	For Automation Rate Pieces, Enter Date of Address Matching and Coding <b>10/26/22</b>	For Carrier Route Pieces, Enter Date of Address Matching and Coding <b>10/26/22</b>	For Carrier Route Pieces, Enter Date of Carrier Route Sequencing ___/___/___	For Pieces Bearing a Simplified Address Enter Date of Delivery Statistics File or Alternative Method ___/___/___			
	Move Update Method: <b>Alternative Address Format</b>						
This is a Political Campaign Mailing Yes		This is Official Election Mail No		[ ] Letter-size or flat mailpiece contains DVD/CD or other disc.			

<b>Postage</b>	Parts Completed <b>A, B</b>		
	<b>Subtotal Postage (Add parts totals)</b>	\$664.68	
	Complete if the mailing includes pieces bearing metered/PC Postage or precanceled stamps. Rate at Which Postage Affixed (Check one) <input type="checkbox"/> Correct <input type="checkbox"/> Lowest <input type="checkbox"/> Neither	_____ pcs. x \$ _____ = <b>Postage Affixed</b>	\$0.000
	Incentive/Discount Flat Dollar Amount	\$-6.69	
	Fee _____	\$0.00	
	<b>Net Postage Due</b>	\$664.68	
	<b>For USPS Use Only: Additional Postage Payment (State reason)</b>		
<b>Total USPS Adjusted Postage</b>	\$664.68		

<b>Certification</b>	Incentive/Discount Claimed: N/A	Type of Fee: N/A
	The mailer certifies acceptance of liability for and agreement to pay any revenue deficiencies assessed on this mailing, subject to appeal. If an agent certifies that he or she is authorized on behalf of the mailer then that mailer is bound by the certification and agrees to pay any deficiencies. In addition, agents may be liable for any deficiencies resulting from matters within their responsibility, knowledge, or control. The mailer hereby certifies that all information furnished on this form is accurate, truthful, and complete; that the mail and the supporting documentation comply with all postal standards and that the mailing qualifies for the prices and fees claimed; and that the mailing does not contain any matter prohibited by law or postal regulation. I understand that anyone who furnishes false or misleading information on this form or who omits information requested on this form may be subject to criminal and/or civil penalties, including fines and imprisonment. Privacy Notice: For information regarding our Privacy Policy visit <a href="http://www.usps.com">www.usps.com</a>	

This postage statement was verified and accepted under the PostalOne! program. No postal signature or round stamp is required.

# Part A

## Automation Letters

### Letters 3.5 oz (0.2188 lbs) or less

Entry	Price	Price	No. of Pieces	Subtotal Postage	Discount Total*	Fee Total	Total Postage	
Category								
A1	None	5-Digit	\$0.296	2,151	\$636.6960	\$-6.4530	\$0.0000	\$630.2430
A3	None	Mixed AADC	\$0.349	79	\$27.5710	\$-0.2370	\$0.0000	\$27.3340

A9	<b>Part A Total (Add lines A1-A8)</b>						\$657.5770
----	---------------------------------------	--	--	--	--	--	------------

## Full Service Intelligent Mail Option

A10	DISPLAY ONLY Letters - Number of Pieces that Comply 2230.0 x 0.003 =						\$6.6900
-----	--	--	--	--	--	--	----------

\* May contain both Full Service Intelligent Mail and other discounts

# Part B

## Nonautomation Letters

### Machinable Letters 3.5 oz (0.2188 lbs) or less

Entry	Price	Price	No. of Pieces	Subtotal Postage	Discount Total	Fee Total	Total Postage	
Category								
B2	None	Mixed AADC	\$0.355	20	\$7.1000	\$0.0000	\$0.0000	\$7.1000

B28	<b>Part B Total (Add lines B1 - B27)</b>						\$7.1000
-----	--	--	--	--	--	--	----------

This postage statement was verified and accepted under the PostalOne! program. No postal signature or round stamp is required.

# ROBERT SEZAK

---

- Saved taxpayers money on the Town Council
  - Supported job creation as a Somerset County Commissioner
  - Brought people together to get it done
- 





# Robert Sezak will build bridges to lower costs and create jobs.

Politicians in Augusta spend so much time fighting each other, they rarely have time to get things done. Robert Sezak will bring a different approach. On the Fairfield Town Council and as a Somerset County Commissioner, he helped streamline government services, lower costs, and create jobs—and he worked with leaders in both parties to do it.

## The right priorities for Benton and Fairfield

- Find efficiencies to provide Mainers with relief from rising heating and electricity bills
- Carefully manage taxpayer dollars and eliminate wasteful spending
- Invest in vocational and job training programs that prepare students for available jobs

# Robert Sezak for State Representative

VOTE BY NOVEMBER 8<sup>TH</sup>  robertsezak@gmail.com



Paid for and authorized by the candidate.

18 Bunker Ave.  
Fairfield, ME 04937  
ZZZ1



PRSR STD  
U.S. Postage  
PAID  
Portland, ME  
Permit No. 439



2 \*\*\*\*\*AUTO\*\*5-DIGIT 04901



A rural farm scene featuring a large red barn with a white roof and two cupolas, situated behind a white fence. The foreground is a lush green field with a white fence. In the background, a dense line of trees, including evergreens and deciduous trees, stretches across the horizon under a sky filled with soft, white clouds.

**Robert Sezak will stand up for  
local farms, hunters and families.**

**Forever chemicals  
threaten our way of life.**

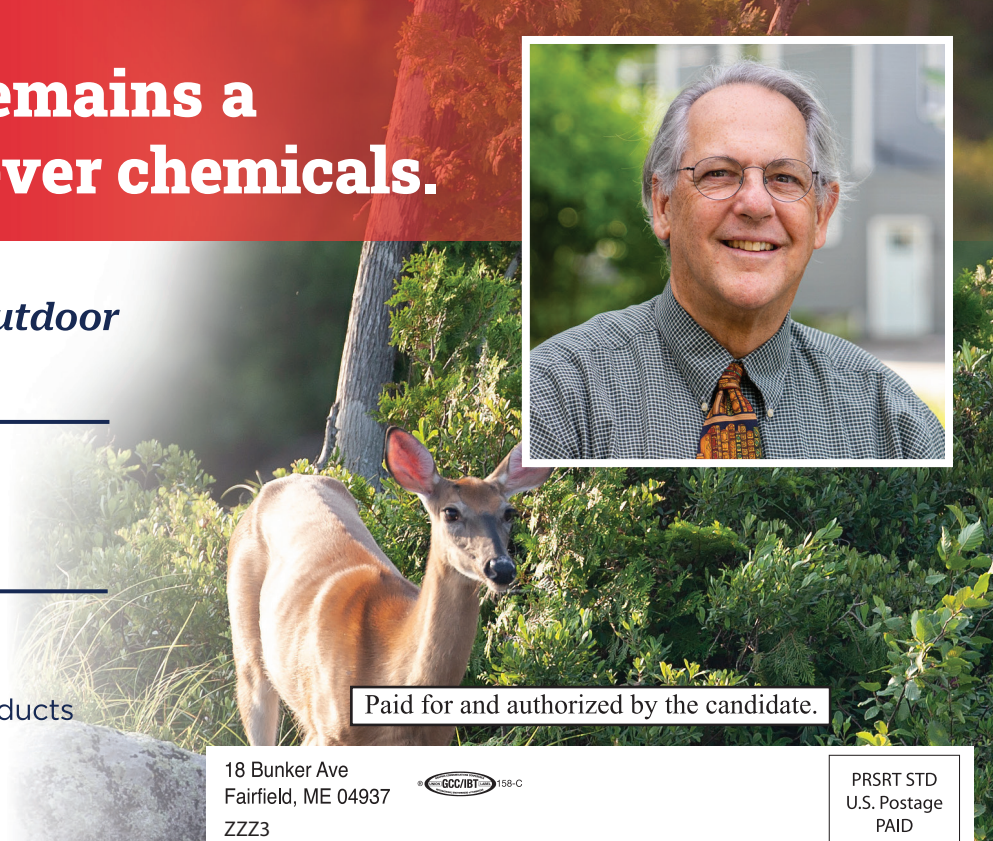


# Robert Sezak will ensure Maine remains a national leader in cleaning up forever chemicals.

*Forever chemicals, or “PFAS,” are a threat to Maine’s outdoor economy, our drinking water, and our local farms.*

**In the State House, Robert Sezak will be a leader on this important issue:**

- Continue to invest funds for cleanup and remediation efforts
- Regulate the presence of PFAS in drinking water and other consumer products
- Collect more data so we can understand where PFAS are most prevalent



Paid for and authorized by the candidate.

## Robert Sezak for State Representative

*For our farms, fishermen, hunters, and families.*

 robertsezak@gmail.com

18 Bunker Ave  
Fairfield, ME 04937  
ZZZ3



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U.S. Postage  
PAID  
Portland, ME  
Permit No. 439



3 \*\*\*\*\*AUTO\*\*5-DIGIT 04901



**Robert Sezak knows you  
get results with handshakes,  
not headlines.**



# Robert Sezak for State Representative

## While partisan fights make the headlines, Robert Sezak will make a difference.

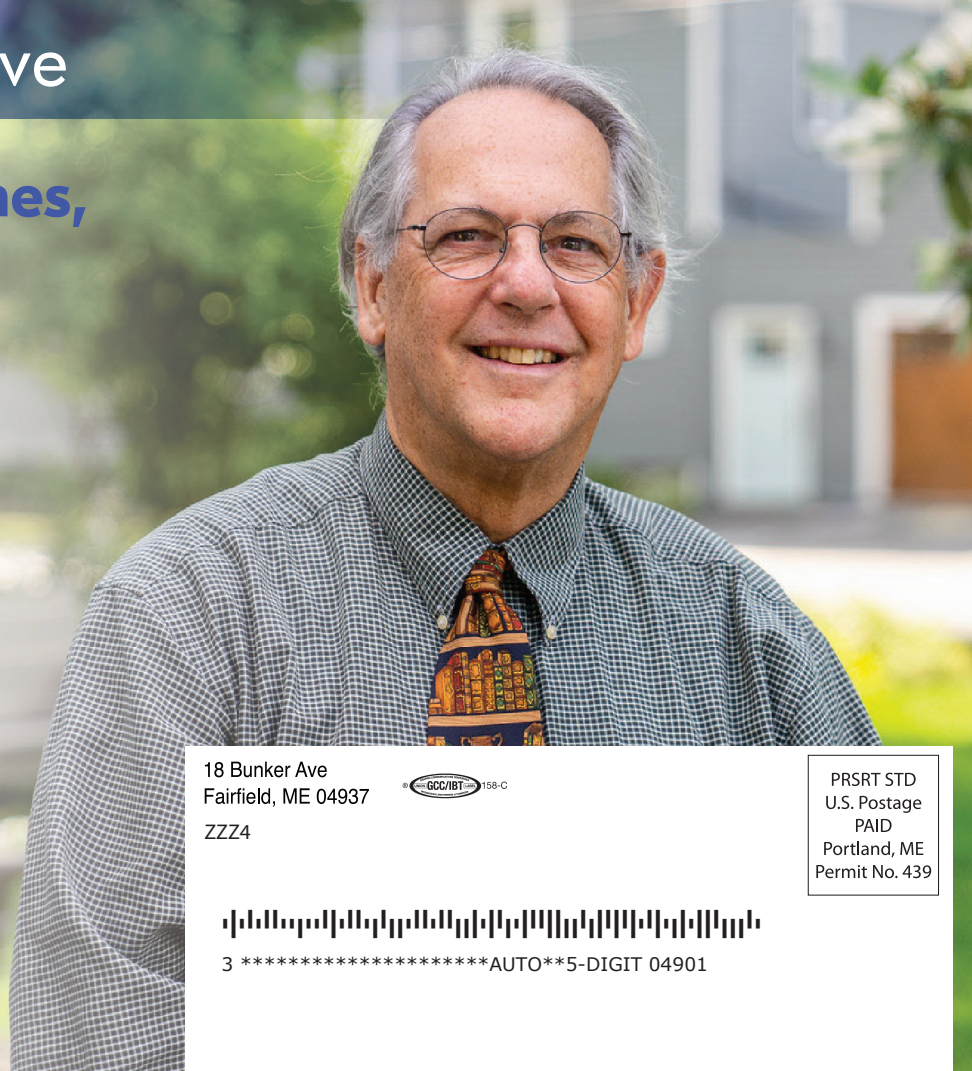
As our State Representative, Robert Sezak will put aside partisanship and work with both parties to get results for middle-class people.

- Reduce the property tax burden for homeowners
- Ensure the state continues to fully fund its share of local education
- Provide families and small businesses relief from high electric bills
- Expand the home heating assistance program
- Make housing more affordable
- Bring high-speed internet to every home by 2025

## Vote Robert Sezak by November 8<sup>th</sup>

✉ [robertsezak@gmail.com](mailto:robertsezak@gmail.com)

Paid for and authorized by the candidate.



18 Bunker Ave  
Fairfield, ME 04937  
ZZZ4



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3 \*\*\*\*\*AUTO\*\*5-DIGIT 04901



A photograph of Robert Sezak, an older man with glasses, wearing a patterned shirt and a tie with a book design. He is shaking hands with a man in a blue polo shirt and a woman in a green shirt. They are outdoors, with a blue railing and greenery in the background.

**Tired of partisan politics?  
So is Robert Sezak.**

**Robert Sezak**

*for State Representative*

# Robert Sezak is focused on bipartisan solutions, not petty partisan fights.

“I don't normally vote Democrat, but Robert Sezak has the honest values and fresh ideas that I want to see in Augusta.”

- Eric Lunt, Republican, Fairfield

“We are proud to endorse Robert Sezak who has served our communities for more than seventeen years by listening to the concerns of all of his constituents.”

- Franklin and Maria Bouchard, Democrats, Fairfield

“Robert Sezak has always worked for and with the people, regardless of political affiliation. We are confident he will continue to do so, bringing knowledge and common sense to Augusta.”

- Jo (Independent) and Rick (Republican) Perry, Fairfield



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18 Bunker Ave.  
Fairfield, ME 04937  
ZZZ5



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PAID  
Portland, ME  
Permit No. 439



3 \*\*\*\*\*AUTO\*\*5-DIGIT 04901

**Robert Sezak**  
*for State Representative*

**Vote Robert Sezak  
by November 8<sup>th</sup>**

📧 robertsezak@gmail.com





# FRAME Media Strategies LLC

c/o Milliken Perkins & Brunelle  
452 Roosevelt Trail  
Windham, ME 04062

# Invoice

Date	Invoice #
6/7/2022	RSH-2022-01

Bill To
Sezak for House Robert Sezak 18 Bunker Ave Fairfield, ME 04937

**PAID**  
06/13/2022

Due Date	Terms	Project
6/7/2022		

Description	Quantity	Rate	Amount
Palm Card - 3,000 folded		526.00	526.00

Report all amounts as paid to FRAME Media Strategies, 188 State St, Suite 202, Portland, ME 04102, unless otherwise instructed.

**Wire To: Gorham Savings Bank**  
**Routing: 211274573 Account: 6110059034**  
**FRAME Media Strategies LLC - Kevin Brunelle**

<b>Total</b>	\$526.00
<b>Payments/Credits</b>	-\$526.00
<b>Balance Due</b>	\$0.00



**FRAME Media Strategies LLC**

c/o Milliken Perkins & Brunelle  
 452 Roosevelt Trail  
 Windham, ME 04062

**Invoice**

Date	Invoice #
7/27/2022	RSH-2022-02

Bill To
Sezak for House Robert Sezak 18 Bunker Ave Fairfield, ME 04937

**PAID**  
 07/29/2022

Due Date	Terms	Project
7/27/2022		

Description	Quantity	Rate	Amount
UPS (report this amount as paid to UPS, 55 Glenlake Parkway, NE, Atlanta, GA 30328) Shipping for Palm Cards		62.84	62.84
Digital video - filming and editing		700.00	700.00

Report all amounts as paid to FRAME Media Strategies, 188 State St, Suite 202, Portland, ME 04102, unless otherwise instructed.

**Wire To: Gorham Savings Bank**  
**Routing: 211274573 Account: 6110059034**  
**FRAME Media Strategies LLC - Kevin Brunelle**

<b>Total</b>	\$762.84
<b>Payments/Credits</b>	-\$762.84
<b>Balance Due</b>	\$0.00



**FRAME Media Strategies LLC**

c/o Milliken Perkins & Brunelle  
 452 Roosevelt Trail  
 Windham, ME 04062

**Invoice**

Date	Invoice #
8/22/2022	RSH-2022-03

Bill To
Sezak for House Robert Sezak 18 Bunker Ave Fairfield, ME 04937

**PAID**  
 09/09/2022

Due Date	Terms	Project
8/22/2022		

Description	Quantity	Rate	Amount
Facebook (report this amount as paid to Facebook, 1 Hacker Way, Menlo Park, CA 94025)		1,700.00	1,700.00
House Digital: 4 weeks media buy			
House Digital Design: 1 round creative		50.00	50.00
House Digital: 4 weeks media commission		300.00	300.00
House Mail: 3 Pieces @ 6x11		5,291.00	5,291.00

Report all amounts as paid to FRAME Media Strategies, 188 State St, Suite 202, Portland, ME 04102, unless otherwise instructed.

**Wire To: Gorham Savings Bank**  
**Routing: 211274573 Account: 6110059034**  
**FRAME Media Strategies LLC - Kevin Brunelle**

<b>Total</b>	\$7,341.00
<b>Payments/Credits</b>	-\$7,341.00
<b>Balance Due</b>	\$0.00



# FRAME Media Strategies LLC

c/o Milliken Perkins & Brunelle  
452 Roosevelt Trail  
Windham, ME 04062

# Invoice

Date	Invoice #
10/16/2022	RSH-2022-04

Bill To
Sezak for House Robert Sezak 18 Bunker Ave Fairfield, ME 04937

**PAID**  
10/17/2022

Due Date	Terms	Project
10/16/2022		

Description	Quantity	Rate	Amount
House Mail: 1 Pieces @ 6x11		1,764.00	1,764.00

Report all amounts as paid to FRAME Media Strategies, 188 State St, Suite 202, Portland, ME 04102, unless otherwise instructed.

**Wire To: Gorham Savings Bank**  
**Routing: 211274573 Account: 6110059034**  
**FRAME Media Strategies LLC - Kevin Brunelle**

<b>Total</b>	\$1,764.00
<b>Payments/Credits</b>	-\$1,764.00
<b>Balance Due</b>	\$0.00



FRAME Media Strategies LLC

c/o Milliken Perkins & Brunelle  
452 Roosevelt Trail  
Windham, ME 04062

# Credit Memo

Date	Credit No.
12/19/2022	CR-202231

Customer
Sezak for House Robert Sezak 18 Bunker Ave Fairfield, ME 04937

**REFUNDED**

P.O. No.	Project

Description	Qty	Rate	Amount
Facebook (report this amount as paid to Facebook, 1 Hacker Way, Menlo Park, CA 94025)		5.47	-5.47

	<b>Total</b>	-5.47
	<b>Invoices</b>	\$5.47
	<b>Balance Credit</b>	\$0.00

Robert Sezak  
18 Bunker Avenue  
Fairfield, ME 04937

Jonathan Wayne, Executive Director  
Maine Commission on Governmental and Election Practices  
45 Memorial Circle  
Augusta, ME 04330

Dear Mr. Wayne, Ms. Gordon, and Ethics Commission Members:

My name is Robert Sezak, of Fairfield. I was a candidate for House District 67 in 2022. Although I lost a close race to Rep. Shelley Rudnicki, I was very proud of the campaign I ran. The campaign was positive, engaging and energetic. I called Rep. Rudnicki later that month to congratulate her on her victory.

I would like to thank you and the staff at the Ethics Commission for always being helpful and professional throughout the campaign. Navigating finance and ethics rules and laws is not always easy for inexperienced/part-time candidates, but your staff was a tremendous help, for which I am very grateful.

I am writing at the request of Mr. Wayne and Ms. Gordon in response to Rep. Rudnicki's letter to the Ethics Commission dated January 12, 2023, in which she filed an official complaint against me. In this brief letter, Rep. Rudnicki makes several allegations, including an allegation that mail pieces that were purchased by my campaign from Frame Media, and subsequently reported on finance reports, were never sent.

Let me clearly and emphatically state that this allegation is completely false. Every mail piece I purchased was sent to voters in my district. Further, this allegation and complaint seem to be based on no evidence whatsoever, other than Rep. Rudnicki's claim that since she and her friends did not receive any mail pieces, then they must not have existed. At your request and my urging, Dave Loughran of Frame Media provided Mr. Wayne with complete and overwhelming evidence that every single one of the mail pieces I purchased were sent to voters in my district. Contained in the evidence that Mr. Loughran sent Mr. Wayne were exact mail quantities, drop dates, and postage prices, and the forms filed when the mail was deposited at the USPS sorting facility. Also included were copies of the four mail pieces, including post-marked samples sent to voters in the district. I am also attaching further evidence that the mailings went out to the voters of my district.

I hope that this overwhelming evidence completely and satisfactorily answers any questions you may have had. The evidence clearly and thoroughly refutes Rep. Rudnicki's baseless claims against me.

Although Ms. Gordon requested my presence at the Commission meeting on February 28, I am asking for your permission to not be present. Rep. Rudnicki's claims against me are totally baseless and were provided without evidence, and they have caused enough people, including yourselves, much wasted time. I have provided complete and substantial evidence disproving her allegations, going well beyond the legally mandated disclosures required by state law. For these reasons, I am requesting not to have to be required to attend this meeting.

Thank you for your attention and fairness, and please let me know if I can provide the staff or commission any other information.

Sincerely,  
Robert Sezak

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"I don't normally vote Democrat, but Robert Sezak has the honest values and fresh ideas that I want to see in Augusta."

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- Jo (Independent) and Rick (Republican) Perry, Fairfield



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Portland, ME  
Permit No. 439

992\*\*\*\*\*AUTO\*\*5-DIGIT 04901

Or Current Resident

Fairfield, ME 04937-1501

**Robert Sezak**  
for State Representative

**Vote Robert Sezak  
by November 8<sup>th</sup>**

robertsezak@gmail.com

# Robert Sezak will build bridges to lower costs and create jobs.

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## The right priorities for Benton and Fairfield

- Find efficiencies to provide Mainers with relief from rising heating and electricity bills
- Carefully manage taxpayer dollars and eliminate wasteful spending
- Invest in vocational and job training programs that prepare students for available jobs



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Or Current Resident

Fairfield ME 04937-1501

**Robert Sezak for State Representative**

VOTE BY NOVEMBER 8<sup>TH</sup> robertsezak@gmail.com



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- JD [unreadable] and [unreadable] Derry, Fairfield



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Fairfield, ME 04937  
ZZZ5



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Permit No. 439

1889\*\*\*\*\*AUTO\*\*S-DIGIT 04901

Or Current Resident  
Fairfield, ME 04937-3009

**Robert Sezak**  
for State Representative

**Vote Robert Sezak  
by November 8<sup>th</sup>**

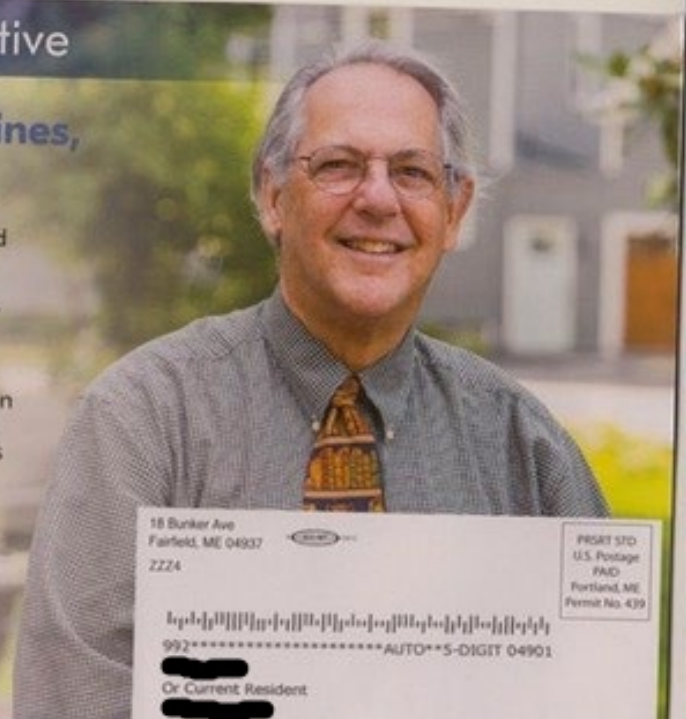
robertsezak@gmail.com

# Robert Sezak for State Representative

## While partisan fights make the headlines, Robert Sezak will make a difference.

As our State Representative, Robert Sezak will put aside partisanship and work with both parties to get results for middle-class people.

- Reduce the property tax burden for homeowners
- Ensure the state continues to fully fund its share of local education
- Provide families and small businesses relief from high electric bills
- Expand the home heating assistance program
- Make housing more affordable
- Bring high-speed internet to every home by 2025



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Permit No. 439

9932\*\*\*\*\*AUTO\*\*S-DIGIT 04901

Or Current Resident  
Fairfield ME 04937-1501

**Vote Robert Sezak by November 8<sup>th</sup>**

robertsezak@gmail.com

Paid for and authorized by the candidate.

attendance by complainants, witnesses, the press and other members of the public. Notwithstanding Title 1, chapter 13, telephone meetings of the commission are permitted:

**A.** During the 28 days prior to an election when the commission is required to meet within 2 business days of the filing of any complaint with the commission; or

**B.** To address procedural or logistical issues before a monthly meeting, such as the scheduling of meetings, deadlines for parties' submission of written materials, setting of meeting agenda, requests to postpone or reschedule agenda items, issuing subpoenas for documents or witnesses and recusal of commission members.

**3. Other meetings.** The commission shall meet at other times on the call of the Secretary of State, the President of the Senate, the Speaker of the House or the chair or a majority of the members of the commission, as long as all members are notified of the time, place and purpose of the meeting at least 24 hours in advance.

**4. Office hours before election.** The commission office must be open with adequate staff resources available to respond to inquiries and receive complaints from 8 a.m. until at least 5:30 p.m. on the Saturday, Sunday and Monday immediately preceding an election.

## § 1003. Investigations by commission

---

**1. Investigations.** The commission may undertake audits and investigations to determine whether a person has violated this chapter, chapter 14 or the rules of the commission. For this purpose, the commission may subpoena witnesses and records whether located within or without the State and take evidence under oath. A person or entity that fails to obey the lawful subpoena of the commission or to testify before it under oath must be punished by the Superior Court for contempt upon application by the Attorney General on behalf of the commission. The Attorney General may apply on behalf of the commission to the Superior Court or to a court of another state to enforce compliance with a subpoena issued to a nonresident person. Service of any subpoena issued by the commission may be accomplished by:

**A.** Delivering a duly executed copy of the notice to the person to be served or to a partner or to any officer or agent authorized by appointment or by law to receive service of process on behalf of that person;

**B.** Delivering a duly executed copy of the notice to the principal place of business in this State of the person to be served; or

**C.** Mailing by registered or certified mail a duly executed copy of the notice, addressed to the person to be served, to the person's principal place of business.

→ **2. Investigations requested.** A person may apply in writing to the commission requesting an investigation as described in subsection 1. The commission shall review the application and shall make the investigation if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred.

**2-A.** [Repealed]

**3. State Auditor.** The State Auditor shall assist the commission in making investigations and in other phases of the commission's duties under this chapter, as requested by the commission, and has all necessary powers to carry out these responsibilities.

**3-A. Confidential records.** Investigative working papers of the commission are confidential, except that the commission may disclose them to the subject of the audit or investigation, other entities as necessary for the conduct of an audit or investigation and law enforcement and other agencies for purposes of reporting, investigating or prosecuting a criminal or civil violation. For purposes of this subsection, "investigative working papers" means documents, records and other printed or electronic information in the following limited categories that are acquired, prepared or maintained by the commission during the conduct of an audit, investigation or other enforcement matter:

**A.** Financial information not normally available to the public;

**B.** Information that, if disclosed, would reveal sensitive political or campaign information belonging to a party committee, political action committee, ballot question committee, candidate or candidate's political committee, or other person who is the subject of an audit, investigation or other enforcement matter, even if the information is in the possession of a vendor or 3rd party;

**C.** Information or records subject to a privilege against discovery or use as evidence; and

**D.** Intra-agency or interagency communications related to an audit or investigation, including any record of an interview, meeting or examination.

The commission may disclose investigative working papers or discuss them at a public meeting, except for the information or records subject to a privilege against discovery or use as evidence, if the information or record is materially relevant to a memorandum or interim or final report by the commission staff or a decision by the commission concerning an audit, investigation or other enforcement matter. A memorandum or report on the audit or investigation prepared by staff for the commission may be disclosed at the time it is submitted to the commission, as long as the subject of the audit or investigation has an opportunity to review it first to identify material that the subject of the audit or investigation considers privileged or confidential under some other provision of law.

- F. Knowingly accepted any contributions, including any in-kind contributions, or used funds other than fund revenues distributed under this chapter to make campaign-related expenditures without the permission of the commission;
- G. Knowingly made a false statement or material misrepresentation in any report or other document required to be filed under this chapter or chapter 13;
- H. Otherwise substantially violated the provisions of this chapter or chapter 13; or
- I. As a gubernatorial candidate, failed to properly report seed money contributions as required by this section.

The determination to revoke the certification of a candidate must be made by a vote of the members of the commission after an opportunity for a hearing. A candidate whose certification is revoked shall return all unspent funds to the commission within 3 days of the commission's decision and may be required to return all funds distributed to the candidate. In addition to the requirement to return funds, the candidate may be subject to a civil penalty under section 1127. The candidate may appeal the commission's decision to revoke certification in the same manner provided in subsection 14, paragraph C.

**5-B. Restrictions on serving as treasurer.** A participating or certified candidate may not serve as a treasurer or deputy treasurer for that candidate's campaign, except that the candidate may serve as treasurer or deputy treasurer for up to 14 days after declaring an intention to qualify for campaign financing under this chapter until the candidate identifies another person to serve as treasurer.

**6. Restrictions on contributions and expenditures for certified candidates.** After certification, a candidate must limit the candidate's campaign expenditures and obligations, including outstanding obligations, to the revenues distributed to the candidate from the fund and may not accept any contributions unless specifically authorized by the commission. Candidates may also accept and spend interest earned on fund revenues in campaign bank accounts. All revenues distributed to a certified candidate from the fund must be used for campaign-related purposes. The candidate, the treasurer, the candidate's committee authorized pursuant to section 1013-A, subsection 1 or any agent of the candidate and committee may not use these revenues for any but campaign-related purposes. The candidate, the treasurer, the candidate's committee authorized pursuant to section 1013-A, subsection 1 or any agent of the candidate and committee may not use these revenues for post-election parties. This section does not prohibit a candidate from using personal funds for post-election parties as governed by rules of the commission. The commission shall publish guidelines outlining permissible campaign-related expenditures.

**6-A. Assisting a person to become an opponent.** A candidate or a person who later becomes a candidate and who is seeking certification under subsection 5, or an agent of that candidate, may not assist another person in qualifying as a candidate for the



# 2022 EXPENDITURE GUIDELINES

*Candidates must spend Maine Clean Election Act (MCEA) funds for campaign-related purposes and not for other purposes such as the candidate's personal benefit, party-building, or to promote another candidate's campaign. Candidates are required to comply with these guidelines for all expenditures of MCEA funds.*

## PERMISSIBLE EXPENDITURES

Expenditures for "campaign-related purposes" are those which are traditionally accepted as necessary to promote the election of a candidate to political office. Candidates using MCEA funds must also take into account the public nature of the funds, the underlying objectives of the MCEA, and the reasonableness of the expenditures under the circumstances. In Maine, traditional campaign expenses have included:

- Political advertising expenses
- Campaign communications such as signs, bumper stickers, T-shirts, or caps with campaign slogans, etc.
- Campaign events (e.g., invitations, food, tent or hall rental, etc.)
- Printing and mailing costs
- Office supplies
- Campaign staff expenses
- An entry fee for an event organized by a party committee, charity, or community organization or an ad in an event publication, as long as the expenditure benefits the candidate's campaign
- Campaign travel expenses, such as fuel and tolls.

## **Ballot Questions**

Candidates may state their position with respect to a ballot question in a communication financed with MCEA funds. Candidates may not use MCEA funds for a paid communication that primarily supports or opposes a referendum or citizen initiative.

## **Campaign Training**

Candidates may use MCEA funds for tuition or registration costs for campaign or policy issues training.

**If you have questions about these Guidelines or a specific expenditure, contact your Candidate Registrar at 287-4179.**

## PROHIBITED EXPENDITURES

**Candidates may not use MCEA funds for personal expenses.** This means candidates may not borrow from or use MCEA funds for personal or other non-campaign expenses, even if temporarily and with the intention of repaying the funds. Personal expenses are for goods and services that the candidate would otherwise purchase independently of the campaign, such as:

- Day-to-day household expenses and supplies
- Mortgage, rent, or utility payments for the candidate's personal residence, even if part of the residence is being used by the campaign
- Vehicle repair and maintenance
- Non-campaign transportation expenses
- Clothing, including attire for political functions such as business suits or shoes

### **MCEA funds may not be spent to:**

- pay a consultant, vendor, or campaign staff for anything other than campaign goods or services
- compensate the candidate or their spouse or domestic partner for services provided
- make independent expenditures supporting or opposing any candidate, ballot question, or political committee
- assist in any way the campaign of any candidate other than the candidate for whom the funds were originally designated ←
- contribute to another candidate, a political committee, or a party committee other than in exchange for goods and services
- make a donation to a charity or a community organization, other than in exchange for campaign goods or services
- promote political or social positions or causes other than the candidate's campaign
- make a thank-you gift (including a gift card) to a volunteer or supporter, or hold an election night or post-election party
- pay civil penalties, fines, or forfeitures to the Commission, or defend the candidate in enforcement proceedings brought by the Commission
- assist the candidate in an election recount.



## Car Travel

MCEA campaigns may reimburse the candidate or campaign workers for their car travel, as long as the person reimbursed has kept a *contemporaneous* travel log. The campaign may make a travel reimbursement up to the number of miles traveled as reported in the log multiplied by \$0.45. Campaigns must keep the travel logs for three years, and provide them to the Commission if requested. Candidates and their spouses/domestic partners may spend any amount of their personal funds for campaign travel without seeking reimbursement. Other individuals may spend up to \$350 of their personal funds to pay for travel without making a contribution to the campaign. Any mileage incurred during the pre-certification Seed Money period must be reimbursed with Seed Money if reimbursed.

## Food

Candidates may spend a reasonable amount of MCEA funds on food for campaign events or to feed volunteers while they are working, but must take into account the public nature of MCEA funding. Legislative candidates may not use MCEA funds to purchase food that is consumed *only* by the candidate and/or members of the candidate's immediate family. Generally, reasonable amounts for food should not exceed \$5 per person for breakfast, \$10 per person for lunch, and \$20 per person for dinner. If candidates wish to spend greater amounts per person for food, the Commission recommends that the candidate contact the Commission staff for guidance.

## Lodging

Candidates may use MCEA funds to pay for lodging if necessary for campaign purposes, but must keep lodging expenses reasonable and may not exceed the lodging rates approved by the Office of State Controller for state employees conducting travel for state business. MCEA candidates may use personal funds for lodging, provided that they are not reimbursed by others.

## Office Supplies

Candidates may spend MCEA funds for office supplies that they reasonably anticipate will be used for campaign purposes only. MCEA funds may not be spent for office supplies to be used for constituent communications or for other expenses associated with service as a public official. The Commission may require candidates to repay their campaign for any office supplies with a value of \$50 or more that were not used for campaign purposes or were used minimally for campaign purposes.

## Post-Election Notes & Parties

Candidates may spend up to the following maximum amounts of MCEA funds on post-election thank you notes or advertising to thank supporters or voters: \$250 for State Representative candidates and \$750 for State Senate candidates. Candidates may also use personal funds for these purposes. Candidates may not spend any amount of MCEA funds on post-election events or parties.

## Promotional Items

Candidates may spend MCEA funds on inexpensive items to promote their candidacies or to gain visibility at public events. Purchases of apparel generally should not cost more than \$10 per item. Candidates may purchase other types of promotional items, but the cost should not exceed \$5 per item. Candidates may purchase up to two pieces of outerwear (e.g., fleeces or sweatshirts) to promote their election. Professional clothing is not considered a promotional item.

## Property & Equipment

Goods purchased with MCEA funds for \$50 or more that could be converted to personal use after the campaign (e.g., computers, fax machines, and cell phones) must be sold at fair market value and the proceeds returned to the Maine Clean Election Fund no later than 42 days after the final report for the campaign. If the campaign sells the property or equipment to the candidate or a member of the candidate's immediate family or campaign staff, the campaign must receive at least 75% of the original purchase price paid by the campaign. Candidates are welcome to lease electronic and other equipment.

## Salary & Compensation

Candidates may use MCEA funds to pay for campaign-related services by staff or consultants, provided that compensation is made at or below fair market value and sufficient records are maintained to show what services were received. Documentation must include a description of the labor performed by the staff member or consultant, and an itemization of any goods or services purchased from other vendors including date, vendor, and amount.

## Unnecessary Goods

Legislative candidates may not spend MCEA funds for goods not typically necessary for a House or Senate campaign, such as office furniture, a brief case, or large storage items. If you are unsure whether an item you wish to purchase is within this category, please call the Ethics Commission for guidance.

**If you are unsure if an expenditure is allowable under the MCEA Guidelines, contact your Candidate Registrar by email or call 287-4179 .**