FAX: (207) 287-6775



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

To: Commission

From: Jonathan Wayne, Executive Director

Date: September 15, 2021

Re: Working Families PAC – Investigation Report

This cover memo is to update you on Michael Dunn's investigation concerning the Working Families PAC and to share two observations. Mr. Dunn found that during 2013-2017 the Working Families PAC did not disclose in campaign finance reports a large amount of the PAC's financial activities, including \$16,047 in expenditures.

The only reason the staff is not recommending penalties for insufficient financial reporting is the lack of available evidence at this time concerning the PAC's major purpose and the current language of the applicable statute governing PACs' reporting of expenditures, 21-A M.R.S. § 1060. Fortunately, earlier this year the Maine Legislature amended § 1060, so that beginning Oct. 18, 2021 PACs will be required to disclose *all* transactions from its bank account, regardless of the PAC's major purpose.

I also would like to emphasize that the Commission staff knows of no similar case involving a leadership PAC in Maine. Mr. Dunn's recent enhanced compliance review of fifteen 2020 leadership PACs demonstrates that most Legislators show a sense of personal responsibility in their use of PAC funds and in meeting their financial reporting responsibilities. We would not want you or the public to conclude that the behavior of the Working Families PAC is common for leadership PACs in Maine. ¹

Ms. Russell did not respond to our August 27, 2021 letter notifying her of a proposed \$285 penalty for accepting an over-the-limit contribution and inviting her to designate any information she deemed confidential. Thank you.

WEBSITE: WWW.MAINE.GOV/ETHICS PHONE: (207) 287-4179

¹ During the past decade, we have been made aware of a few situations in which PACs were used in a much more limited way for expenses that some might view as personal but these are outliers (e.g., bridge loans to a family business, vehicle maintenance, or two months of cell phone expenses).



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

August 27, 2021

Hon. Diane Russell Working Families PAC 72 Auburn Street Portland, ME 04103

NOTICE OF PROPOSED PENALTY, INVESTIGATIVE REPORT AND OPPORTUNITY TO RESPOND

Dear Ms. Russell:

At its May 26, 2021 meeting, the Ethics Commission directed its staff to investigate the financial activities of the Working Families PAC for the period of 2013-2017 to determine the cause for a reporting discrepancy of roughly \$13,700 in the PAC's reported cash balance. The investigation was conducted by Political Committee and Lobbyist Registrar Michael Dunn based on records of the PAC's financial institution.

Mr. Dunn found that the PAC received \$4,321 in contributions and made \$16,048 in expenditures that the PAC did not disclose in campaign finance reports. This included \$660 in payments by the PAC to your 2016 campaign for State Senate that your Senate campaign did not report. If these payments were to promote your nomination for State Senate, they exceeded the \$375 per-election contribution limit applicable to 2016 Senate candidates by \$285.

Contents of this Packet

The staff intends to report back to the Commission at its meeting on September 29, 2021. This packet of information is to provide you with the written materials that the Commission staff intends to present publicly at the meeting and to invite you to respond.

Investigative Report. I have attached an investigative report by Mr. Dunn summarizing his findings and listing the unreported PAC expenditures. For reasons explained in the report, the Commission staff will not recommend findings of violation and penalties at the September 29 meeting for the unreported expenditures, although the Commission may wish to pursue further investigation that could lead to additional enforcement actions at a later time.

Memo on contribution limit violations. I have also attached a memo by Candidate Registrar Emma Burke discussing the \$660 in payments by the Working Families PAC to your 2016 campaign for the State Senate. At the present time, the Commission staff is preliminarily viewing these payments as a contribution to your 2016 primary election campaign, although we would be pleased to consider any responsive information you would like to provide.

PHONE: (207) 287-4179 FAX: (207) 287-6775

Ms. Diane Russell Page 2 August 27, 2021

Enforcement Actions Recommended by Commission Staff

The Commission staff will recommend that the Commission find that the Working Families PAC violated 21-A M.R.S. § 1015(2) by making contributions to promote your 2016 campaign for State Senate that exceeded the \$375 limit by \$285. The staff will recommend the assessment of a penalty of \$285 against you for accepting contributions that exceeded the limit. 21-A M.R.S. § 1004(2-A).

Your Opportunity to Respond

The Commission will be considering this matter at its meeting on September 29, 2021. The meeting will begin at 10:00 a.m. and will be conducted in person at the Commission's office at 45 Memorial Circle in Augusta. You are invited to respond to the proposed finding of violation and penalty by submitting any written information or argument you would like by September 13, 2021. You are also invited to attend the meeting personally to respond to the proposed finding of violation and penalty. The Commission would welcome any other response you would like to make to the results of the Commission staff's investigation.

Disclosure of Financial Information

Currently, the Commission staff intends to present Mr. Dunn's investigative report to the Commission at its September 29, 2021 meeting, including by making the report available to the public. Under the Commission's investigations statute (21-A M.R.S. § 1003(3-A)), the Commission is generally permitted to disclose confidential financial information obtained in the course of an investigation, if the information is materially relevant to a memorandum or interim or final report by the Commission staff.

If you believe that the report contains any information that is privileged or that the Commission is required to keep confidential under any provision of law, *please specify that information in writing no later than September 13, 2021.* Otherwise the investigative report will be made public and posted on the Commission's website in connection with the September 29 meeting, in accordance with our usual meeting procedures.

If you have any questions about this matter, please contact Mr. Dunn at Michael.Dunn@maine.gov or (207) 287-4709.

Sincerely,

Jonathan Wayne Executive Director

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

To: Commissioners

From: Emma Burke, Candidate Registrar

Date: August 23, 2021

Re: Over the Limit Contributions from Working Families PAC to 2016 State Senate

Campaign of Diane Russell

In 2015 and 2016, Diane Russell was the Principal Officer for Working Families PAC, as well as a traditionally financed candidate in the Democratic primary for State Senate District 27 in Portland. Ms. Russell was unsuccessful in the primary election. A recent investigation into Working Families PAC revealed the PAC had made multiple unreported donations to Ms. Russell's State Senate campaign, resulting in the contribution limit being violated.

LEGAL REQUIREMENTS

Beginning December 1, 2010, candidates for the legislature may not accept contributions aggregating more than \$350 from a PAC, with the contribution limit being adjusted for inflation based upon the Consumer Price Index every two years (21-A M.R.S. § 1015(2)). For the 2016 election, the legislative contribution limit for donations from PACs was \$375 per election. If a candidate accepts contributions in excess of the limitation, the amount of the penalty shall be no greater than the amount by which the limitation was exceeded (21-A M.R.S. § 1004-A(2)).

DISCUSSION

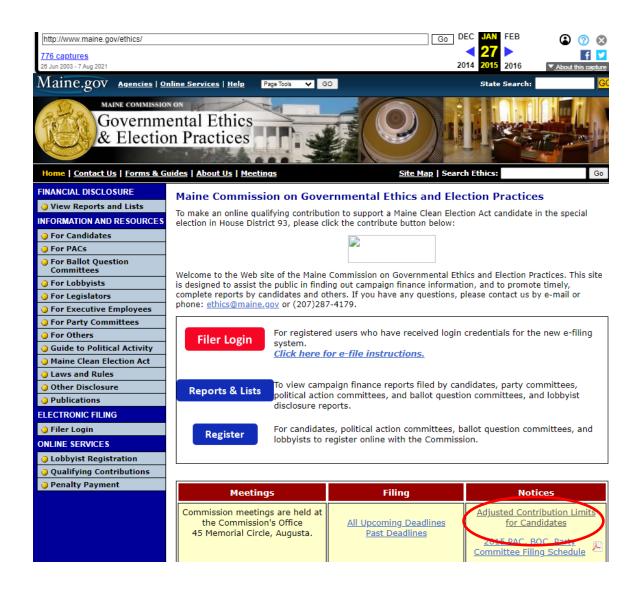
Contribution Limit Guidance

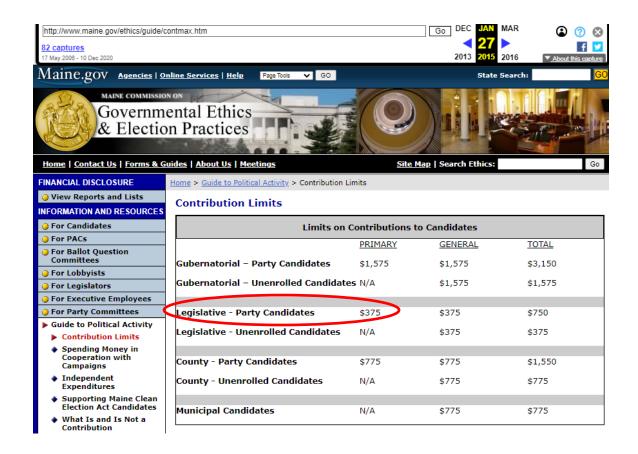
Ms. Russell registered to run for State Senator in District 27 on October 13, 2015. At this time, the contribution limits for 2015 and 2016 were posted on the Commission's State of

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Maine agency website. After registration, Ms. Russell would have received the 2016 Candidate Guidebook for Traditionally Financed Legislative & County Candidates ("Guidebook") and the 2016 Candidate Quick Guide for Traditionally Financed Legislative Candidates ("Quick Guide").

<u>Agency Website</u>. Candidate Registrar Emma Burke confirmed the Ethics Commission's State of Maine agency website had the 2015 and 2016 contribution limits posted at the time Ms. Russell registered as a candidate by using the Wayback Machine Internet Archive. The contribution limits had been posted no later than January 27, 2015.





<u>Guidebook.</u> Soon after registering, Ms. Russell would have been sent the Guidebook. The Guidebook contains no fewer than seven specific mentions of the \$375 contribution limit, on pages 5, 6, 8, 32, and 35. Below are two images from pages 5 and 6 of the Guidebook detailing the contribution limit.

CONTRIBUTION LIMITATIONS

CONTRIBUTION LIMITS PER CONTRIBUTOR FOR 2016 ELECTIONS: PARTY AND UNENROLLED CANDIDATES								
	PRIMARY GENERAL TOTAL							
Legislative Party	\$375	\$375	\$750					
Legislative Unenrolled	N/A	\$375	\$375					
County Party	\$775	\$775	\$1,550					
County Unenrolled	N/A	\$775	\$775					

Legislative Candidate Limit. For the 2016 elections, a contributor may donate to a legislative candidate no more than \$375 per election in the aggregate.

ATTRIBUTING A CONTRIBUTION TOWARDS THE PRIMARY OR GENERAL ELECTION

Party Candidates. For candidates enrolled in a political party (Democratic, Green-Independent, or Republican), the primary and general elections are considered separate elections. Legislative candidates who are on the ballot for both elections may accept \$375 for the primary election and \$375 for the general election from the same contributor for a total of \$750. County candidates who are on the ballot for both elections may accept \$775 from the same contributor for each election for a total of \$1,550.

<u>Quick Guide</u>. Also, shortly after registering, Ms. Russell would have been sent the Quick Guide. The Quick Guide discussed the contribution limit at length, with a whole page dedicated to its explanation. The Frequently Asked Questions page made specific mention of the \$375 limit as well. Below are two images from the Quick Guide.



2016 CONTRIBUTION LIMITS | LOANS | IN-KIND CONTRIBUTIONS

Contribution Limits

For 2016, the contribution limit for legislative candidates is \$375 per election. The primary and general elections are considered separate elections. Therefore, if a candidate is in both a primary and general election, they are allowed to accept \$750 from a single source. Contribution limits do not apply to a candidate or the candidate's spouse/domestic partner. They are allowed to donate unlimited funds to the campaign.

Candidates who are not enrolled in one of the three political parties in Maine - the Maine Democratic Party, the Maine Republican Party, or the Maine Green-Independent Party - are only running in the general election. Unenrolled candidates may only accept up to \$375 from a single contributor.

All types of contributions count towards the contribution limit of \$375. For instance, a candidate cannot accept a \$300 cash contribution as well as an in-kind contribution with a value of \$100 from the same contributor for the same election.

Q: What is the contribution limit for 2016?

A: In 2016, the contribution limit for legislative candidates is \$375 per election. The primary and general elections are separate elections. For the 2016 election cycle, a candidate who is in both elections can accept \$750 from a single contributor. Candidates who are not enrolled in a political party may only accept up to \$375 per contributor.

Reported Activity

Ms. Russell's own reported activity demonstrates understanding of the \$375 contribution limit, as she did not report a single contribution from any entity, other than herself, who donated more than \$375 throughout the primary election. According to her reports, Ms. Russell began accepting compliant donations on 10/24/2015, and reported more than \$2,000 in contributions on her first report, with less than \$400 in expenditures.

Working Families PAC Contributions

Committee Registrar Michael Dunn has been investigating Working Families PAC for unrelated reasons. During his investigation, Mr. Dunn attained access to bank records for Working Families PAC for 2015 and 2016. Upon review, Mr. Dunn ascertained Working Families PAC had contributed to Ms. Russell's State Senate campaign four times throughout November and December of 2015. These contributions added up to \$660, which is \$285 over the \$375 contribution limit. Below are the images from Working Families PAC's bank account, showing transfers from the PAC account to Ms. Russell's campaign account.

11/27	Withdrawal CyberBranch - Mobile Banking	Transfer	То	Share	72	-160.00	1091.59
11/27	Withdrawal CyberBranch - Mobile Banking	Transfer	То	Share	72	-200.00	891.59
11/30	Withdrawal CyberBranch - Mobile Banking	Transfer	То	Share	72	-200.00	691.59
12/23	Withdrawal CyberBranch - Mobile Banking	Transfer	То	Share	72	-100.00	173.97

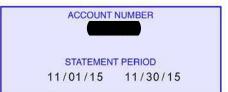
Ms. Russell did not report these contributions in her 2016 January Semiannual Report, and the contents of her report do not indicate a reason for this influx of cash, as her report claims she made few expenditures and had over \$2,000 in cash. The bank records do not reflect these over-the-limit contributions ever being returned to Working Families PAC.

STAFF RECOMMENDATION

As noted in the cover letter by Executive Director Jonathan Wayne, the Commission staff is recommending a maximum penalty of \$285 - the amount by which Ms. Russell accepted over-the-limit contributions from her Working Families PAC. Ms. Russell had access to an abundance of information on the \$375 contribution limit, and her own reported activity demonstrates an understanding of that limit. Overall, the Commission Staff see no mitigating factors when it comes to the recommended penalty for Ms. Russell.

Thank you for your consideration of this memo.

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Page 7



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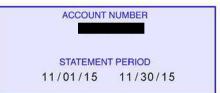
DIANE M RUSSELL 128 R NORTH ST. PORTLAND ME 04101 The Holiday SKIP A PAY Season is back! Skip your eligible Dec or Jan loan pmt, or skip your Five County VISA payment. *Some exclusions may apply. Call Us. OPEN A CHRISTMAS CLUB TODAY! Or increase your current club amount & make your next Holiday Season a whole lot jollier! -NEED CASH? USE YOUR HOME! Learn about our HELOC promo @ MaineLendingExpert.com -Ask us about our Holiday Loan promotion

Posting Date	ID # / Eff. Date	Transaction Description	Payment Credits or Debits	FINANCE	Fees or Charges	Transaction Amount	Balance
11/30		thdrawal Debit Card	COUTU DODTI AN	we		-9.16	129.02
11/30	Wi	/28		F 20:50000		-15.00	114.02
11/30	Wi	/29 093331 5931 GOODWILL thdrawal Debit Card			иг	-59.34	54.68
11/30	Wi	/29			540000000	-6.21	48.47
11/30	Dep	/30 030674 5812 TST*AMATO posit CyberBranch Transfe			ME	200.00	248.47
11/30		Mobile Banking w Balance earto Date 0.00					248.47
		0.00					
			Total F This Per	or To	otal Yea to-Date		
	:						

	Total For This Period	Total Year- to-Date
Total Returned Item Fees	0.00	0.00
Total Overdraft Fees	0.00	60.00

11/01 ID	73 RUSSELL WORKING FAMILIES PAC Previous Balance		3503.24
11/03	Withdrawal POS #277263 POS CIRCLE K 07020 545 MAIN ST US BANGOR ME	-43.11	3460.13
11/03	Withdrawal Debit Card 11/02 063266 5542 FALMOUTH IRVING FALMOUTH ME	-28.42	3431.71
11/03	Withdrawal POS #297636 POS DYSART'S TRAVEL STOP BANGOR ME	-11.88	3419.83
11/05	Withdrawal Debit Card 11/03 006486 5542 DYSARTS TRUCK STOP BANGOR ME	-25.00	3394.83
11/06	Withdrawal POS #067278 POS SHELL Service Station AUGUSTA ME	-24.52	3370.31
11/09	Withdrawal CyberBranch Transfer To RUSSELL,DIANE M XXXXXXXXXX Share 71	-700.00	2670.31
11/11	Withdrawal CyberBranch Transfer To Share 71 Reimbursement for LV Hotel	-223.00	2447.31
11/12	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-250.00	2197.31
11/12	Withdrawal Debiť Card 11/11 062582 5814 ARABICA COFFEE - COMM PORTLAND ME	-19.46	2177.85
11/12	Withdrawal Debit Card 11/11 050770 7523 ONE CITY CENTER ASSOC PORTLAND ME	-6.00	2171.85
11/13	Withdrawal Debit Card 11/12 034114 4722 TRAVELOCITY.COM WWW.TVLY.COM WA	-155.26	2016.59
11/13	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-200.00	1816.59
11/14	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-100.00	1716.59
11/14	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-100.00	1616.59
11/17	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-100.00	1516.59
11/17	Withdrawal CyberBranch Transfer To Share 71	-200.00	1316.59

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Posting Date	ID # / Eff. Date	Transaction Description	Pay	yment Credit or Debits	S FINANCE CHARGE	Fees or Charges	Transaction Amount	Balance
90 / 125 V (2 / 12 / 12 / 12 / 12 / 12 / 12 / 12 /		Mobile Banking		D7 YDD	22701		marana wanan	TOTAL TERROLOGICAL
11/17	Wi	thdrawal CyberBranch Tr Mobile Banking	ransfer 1	To Share	71		-100.00	1216.59
11/18	Wi	thdrawal CyberBranch Tr Mobile Banking	ransfer 1	To Share	71		-50.00	1166.59
11/18	Wi	thdrawal CyberBranch Tr	ransfer 1	To Share	71		-50.00	1116.59
11/19		thdrawal Debit Card /18 079242 8651 EMERGE	AMERICA	415-3440	323 CA		-25.00	1091.59
11/27	De	posit CyberBranch Trans Mobile Banking	sfer From	n Share 7	1		160.00	1251.59
11/27	Wi	thdrawal CyberBranch Tr Mobile Banking					-160.00	1091.59
11/27	Wi	thdrawal CyberBranch Tr	ransfer 1	To Share	72		-200.00	891.59 <u>c</u>
11/30	<u> </u>	Mobile Banking thdrawal CyberBranch Tr Mobile Banking	ransfer 1	To Share	72		-200.00	691.59 <u>G</u>
11/30	Wi	thdrawal Checking Fee					-5.00	686.59
11/30 Divider	Ne nds Earned Y	w Balance Year to Date 0.00						686.59
				Total F		tal Year		
2727270				This Per	100	to-Date		
Tota	1 Return	ed Item Fees		C	.00	0.0	00	

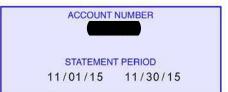
Total Returned Item Fees	0.00	0.00
Total Overdraft Fees	0.00	30.00

Total Dividends Earned Year to Date

0.00

Acc	count Balan	ce Summarv	
Total Shares PRIME SHARE CLASSIC CHECKING CAMPAIGN TO ELECT DIANE RUSSEL RUSSELL WORKING FAMILIES PAC	Balance 25.00 4.27 248.47 686.59	Total Lóans	Balance
9-0-040-04	964.33		

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Page 7



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11/30		thdrawal Debit Card	COUTU DODTI AN	we		-9.16	129.02
11/30	Wi	/28		F 20:50000		-15.00	114.02
11/30	Wi	/29 093331 5931 GOODWILL thdrawal Debit Card			иг	-59.34	54.68
11/30	Wi	/29			540000000	-6.21	48.47
11/30	Dep	/30 030674 5812 TST*AMATO posit CyberBranch Transfe			ME	200.00	248.47
11/30		Mobile Banking w Balance earto Date 0.00					248.47
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	Total For This Period	Total Year- to-Date
Total Returned Item Fees	0.00	0.00
Total Overdraft Fees	0.00	60.00

11/01 ID	73 RUSSELL WORKING FAMILIES PAC Previous Balance		3503.24
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11/14	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-100.00	1716.59
11/14	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-100.00	1616.59
11/17	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-100.00	1516.59
11/17	Withdrawal CyberBranch Transfer To Share 71	-200.00	1316.59

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STATEMENT PERIOD 11/01/15 11/30/15

Page 8



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Total Overdraft Fees

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Posting Date	ID # / Eff. Date	Transaction Description	P	ayment Credit or Debits	S FINANCE CHARGE		Transaction Amount	Balance
11/17		Mobile Banking thdrawal CyberBranch Tra	ansfer	To Share	71		-100.00	1216.59
	-	Mobile Banking					100.00	0.770.000.000.000
11/18	Wi -	thdrawal CyberBranch Tra Mobile Banking	ansfer	To Share	71		-50.00	1166.59
11/18	Wi	thdrawal CyberBranch Tra	ansfer	To Share	71		-50.00	1116.59
11/19		thdrawal Debit Card /18 079242 8651 EMERGE A	MEDIC	A 415 244	1222 CA		-25.00	1091.59
11/27	De	posit CyberBranch Transf	fer Fr	om Share	71		160.00	1251.59
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11/27	WI	thdrawal CyberBranch Tra Mobile Banking	anster	To Share	12		-160.00	1091.59 Can
11/27	Wi	thdrawal CyberBranch Tra	ansfer	To Share	72		-200.00	891.59 Cane
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11/30	. W 1	thdrawal CyberBranch Tra Mobile Banking	anster	to Share	12		-200.00	691.59 Cano
11/30		thdrawal Checking Fee					-5.00	686.59
11/30	Ne	w Balance						686.59
Dividen	ds Earned Y	ear to Date 0.00						
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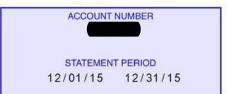
Total Dividends Earned Year to Date

0.00

30.00

Acc	count Balance Summary	
Total Shares PRIME SHARE CLASSIC CHECKING CAMPAIGN TO ELECT DIANE RUSSEL RUSSELL WORKING FAMILIES PAC	Balance 25.00 4.27 248.47 686.59	Balance
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Page 7



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DIANE M RUSSELL 128 R NORTH ST. PORTLAND ME 04101 ATTENTION MEMBERS WITH IRA ACCOUNTS:
Your year-end IRA statement balance is being furnished to the Internal Revenue Service as your IRA fair market value.

Join Us For Our 59th Annual Meeting - Wednesday, February 17th at 5PM - Bath Office located at 765 Washington Street.

'TIS THE SEASON TO SKIP-A-PAY. Call FMI. ~Have a Healthy & Happy New Year~

		Sh Sh	
Posting ID # / Date Eff. Date Transaction Description	Payment Credits FINANCE or Debits CHARGE	Fees or Charges Transaction Amount	Balance
I	Total For T	otal Year-	
	This Period	to-Date	
Total Returned Item Fees	0.00	0.00	
Total Overdraft Fees	0.00	60.00	
			686.59
12/01 ID 73 RUSSELL WORKING FAMILIES PAC 12/06 Withdrawal CyberBranch Transf - Mobile Banking	er To Share 71	-100.00	586.59
12/08 Withdrawal CyberBranch Transf - Mobile Banking	er To Share 71	-100.00	486.59
12/08 Deposit by Check	**** ** ******************************	87.38	573.97
12/12 Withdrawal CyberBranch Transf - Mobile Banking		-100.00	473.97
12/12 Withdrawal CyberBranch Transf - Mobile Banking	er To Share 71	-100.00	373.97
12/13 Withdrawal CyberBranch Transf - Mobile Banking	er To Share 71	-100.00	273.97
12/23 Withdrawal CyberBranch Transf - Mobile Banking	er To Share 72	-100.00	173.97 Candid
12/26 Withdrawal CyberBranch Transf - Mobile Banking	er To Share 71	-100.00	73.97
12/31 Withdrawal Checking Fee 12/31 New Balance Dividends Earned Year to Date 0.00		-5.00	68.97 68.97
Dividends Earned Tear to Date 0.00			
	Total For This Period	otal Year- to-Date	
Total Returned Item Fees	0.00	0.00	
Total Overdraft Fees	0.00	30.00	

Total Dividends Earned Year to Date

0.00

Account Balance Summary				
Total Shares PRIME SHARE CLASSIC CHECKING CAMPAIGN TO ELECT DIANE RUSSEL RUSSELL WORKING FAMILIES PAC	Balance 25.00 645.88 0.01 68.97	Total Lóans	Balance	
	739.86			

Title 21-A Maine Revised Statutes (2015 Version)

§ 1004-A. Penalties

The commission may assess the following penalties in addition to the other monetary sanctions authorized in this chapter.

- **1. Late campaign finance report.** A person that files a late campaign finance report containing no contributions or expenditures may be assessed a penalty of no more than \$ 100.
- 2. Contribution in excess of limitations. A person that accepts or makes a contribution that exceeds the limitations set out in section 1015, subsections 1 and 2 may be assessed a penalty of no more than the amount by which the contribution exceeded the limitation.
- **3. Contribution in name of another person.** A person that makes a contribution in the name of another person, or that knowingly accepts a contribution made by one person in the name of another person, may be assessed a penalty not to exceed \$ 5.000.
- **4. Substantial misreporting.** A person that files a campaign finance report that substantially misreports contributions, expenditures or other campaign activity may be assessed a penalty not to exceed \$ 5,000.
- 5. Material false statements.

A person that makes a material false statement or that makes a statement that includes a material misrepresentation in a document that is required to be submitted to the commission, or that is submitted in response to a request by the commission, may be assessed a penalty not to exceed \$ 5,000.

When the commission has reason to believe that a violation has occurred, the commission shall provide written notice to the candidate, party committee, political action committee, committee treasurer or other respondent and shall afford them an opportunity to appear before the commission before assessing any penalty. In determining any penalty under subsections 3, 4 and 5, the commission shall consider, among other things, the level of intent to mislead, the penalty necessary to deter similar misconduct in the future and the harm suffered by the public from the incorrect disclosure. A final determination by the commission may be appealed to the Superior Court in accordance with Title 5, chapter 375, subchapter 7 and the Maine Rules of Civil Procedure Rule 80C.

Penalties assessed pursuant to this section that have not been paid in full within 30 days after issuance of a notice of the final determination may be enforced in accordance with section 1004-B.

- 1. Individuals. An individual may not make contributions to a candidate in support of the candidacy of one person aggregating more than \$ 1,500 in any election for a gubernatorial candidate, more than \$ 350 for a legislative candidate, more than \$ 350 for a candidate for municipal office and beginning January 1, 2012 more than \$ 750 for a candidate for municipal office or more than \$ 750 in any election for any other candidate. This limitation does not apply to contributions in support of a candidate by that candidate or that candidate's spouse or domestic partner. Beginning December 1, 2010, contribution limits in accordance with this subsection are adjusted every 2 years based on the Consumer Price Index as reported by the United States Department of Labor, Bureau of Labor Statistics and rounded to the nearest amount divisible by \$ 25. The commission shall post the current contribution limit and the amount of the next adjustment and the date that it will become effective on its publicly accessible website and include this information with any publication to be used as a guide for candidates.
- 2. Committees; corporations; associations. A political committee, political action committee, other committee, firm, partnership, corporation, association or organization may not make contributions to a candidate in support of the candidacy of one person aggregating more than \$ 1,500 in any election for a gubernatorial candidate, more than \$ 350 for a legislative candidate, more than \$ 350 for a candidate for municipal office and beginning January 1, 2012 more than \$ 750 for a candidate for municipal office or more than \$ 750 in any election for any other candidate. Beginning December 1, 2010, contribution limits in accordance with this subsection are adjusted every 2 years based on the Consumer Price Index as reported by the United States Department of Labor, Bureau of Labor Statistics and rounded to the nearest amount divisible by \$ 25. The commission shall post the current contribution limit and the amount of the next adjustment and the date that it will become effective on its publicly accessible website and include this information with any publication to be used as a guide for candidates.
- **3. Aggregate contributions.** No individual may make contributions to candidates aggregating more than \$ 25,000 in any calendar year. This limitation does not apply to contributions in support of a candidate by that candidate or that candidate's spouse or domestic partner.
- 4. Political committees; intermediaries. For the purpose of the limitations imposed by this section, contributions made to any political committee authorized by a candidate to accept contributions on the candidate's behalf are considered to be contributions made to that candidate. If the campaign activities of a political action committee within a calendar year primarily promote or support the nomination or election of a single candidate, contributions to the committee that were solicited by the candidate are considered to be contributions made to the candidate for purposes of the limitations in this section. For purposes of this subsection, solicitation of contributions includes but is not limited to the candidate's appearing at a fundraising event organized by or on behalf of the political action committee or suggesting that a donor make a contribution to that committee.

For the purposes of the limitations imposed by this section, all contributions made by a person, either directly or indirectly, on behalf of a particular candidate, that are in any way

earmarked or otherwise directed through an intermediary or conduit to the candidate are considered to be contributions from that person to the candidate. The intermediary or conduit shall report the original source and the intended recipient of the contribution to the commission and to the intended recipient.

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

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

- **6. Prohibited expenditures.** A candidate, a treasurer, a political committee, a party or party committee, a person required to file a report under this subchapter or their authorized agents may not make any expenditures for liquor to be distributed to or consumed by voters while the polls are open on election day.
- 7. Voluntary limitations on political expenditures. A candidate may voluntarily agree to limit the total expenditures made on behalf of that candidate's campaign as specified in section 1013-A, subsection 1, paragraph C and subsections 8 and 9.
- **8. Political expenditure limitation amounts.** Total expenditures in any election for legislative office by a candidate who voluntarily agrees to limit campaign expenditures as provided in subsection 7 are as follows:
 - A. For State Senator, \$25,000; and
 - **B.** For State Representative, \$5,000.
 - **C.** [2007, c. 443, Pt. A, § 14 (RP).]

Expenditure limits are per election and may not be carried forward from one election to another. For calculation and reporting purposes, the reporting periods established in section 1017 apply.

9. Publication of list. The commission shall publish a list of the candidates for State Representative and State Senator who have agreed to voluntarily limit total expenditures for their campaigns as provided in section 1013-A, subsection 1, paragraph C.

For the purposes of subsections 7 and 8 and this subsection, "total expenditures" means the sum of all expenditures made to influence a single election that are made by a candidate or made on the candidate's behalf by the candidate's political committee or committees, the candidate's party or the candidate's immediate family.



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

To: Commission

From: Michael Dunn, Political Committee Registrar

Date: August 25, 2021

Re: Working Families PAC – Investigation Report

On December 18, 2020, the Commission ordered an investigation into the Working Families PAC to determine whether the PAC failed to report transactions that resulted in a discrepancy between its reported balance and bank account balance. Specifically, during the summer of 2020, the financial summary on the first page of the PAC's reports indicated the PAC had a balance of \$13,715.71, but the PAC's former treasurer told Commission staff that she didn't believe the balance was that high. The Commission staff requested bank records from January 1, 2018 to present to review the account for potential discrepancies. The financial institution provided those records, and the Commission staff determined that the account was terminated by the financial institution in October 2018 for carrying a negative balance.

On May 26, 2021, the Commission staff reported back on its findings. The Commission imposed a \$5,000 penalty against the Working Families PAC and Ms. Diane Russell for the failure to file five campaign finance reports for the PAC and one campaign finance report for her 2018 gubernatorial campaign, and failure to amend the registration as required for the Working Families PAC. The Commission also administratively dissolved the Working Family PAC.

The Commission was concerned that staff could not account for the \$13,715.71 discrepancy and directed staff to continue its investigation in an attempt to resolve that discrepancy. The Commission staff served a second subpoena on the financial institution, this time for records from 2013 through present. Due to the age of these records the financial institution had destroyed some of the supporting documents; but the account statements were able to be obtained. The Commission staff is reporting back on its findings and requesting additional guidance from the Commission.

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As discussed below, we found that the PAC made \$16,047.64 in expenditures during 2013-2017, which it did <u>not</u> disclose in campaign finance reports. At the present time, we are not recommending findings of violation and civil penalties for this unreported financial activity because of the language in current campaign finance law and a lack of clarity concerning the PAC's major purpose.

LEGAL REQUIREMENTS

Reporting Obligations. A PAC whose major purpose is to influence elections must report all expenditures, including those that are not for the purpose of influencing a campaign. 21-A M.R.S. §§ 1060(4) & (7). A PAC whose major purpose is not to influence an election must only report the expenditures made for the purpose of influencing an election.¹ Id.

<u>Leadership PACs</u>. Prior to this year (2021), the Commission has not had a statutory definition of Leadership PAC. The Commission staff's internal interpretation has been that a Leadership PAC is a PAC that is established, maintained, or controlled by a member of the Legislature. (This interpretation has been codified in P.L. 2021, Ch. 217, § 3.)

<u>Substantially Non-Conforming Reports.</u> A substantially non-conforming report is considered unfiled. 21-A M.R.S. § 1062-A(2). Unfiled reports are subject to a preliminary penalty that is calculated using a statutory formula. <u>Id.</u> at (3). This formula considers the amount of the financial activity, number of days late, and a statutory percentage. <u>Id.</u> The maximum penalty against a PAC for the late filing of a campaign finance report is \$10,000. <u>Id.</u> at (4).

LEGAL ANALYSIS

After review, the Commission staff has been able to reconcile all but about \$1,500 between the accounts. To reconcile the accounts, Commission staff first added \$4,321.50 in unreported contributions and adjustments for ActBlue fees from 2013 to 2017. The

¹ Due to a 2021 law change proposed by the Commission, beginning on October 18, 2021 PACs will be required to report <u>all</u> expenditures made from the PAC's bank account – regardless of the PAC's major purpose. P.L. 2021, Ch. 217, § 11.

Commission staff then subtracted \$16,047.64 in unreported expenditures during the same time period. Commission staff also located \$460 in what appeared to be duplicated transactions. After making these adjustments, Commission staff reduced the discrepancy to \$1,529.57. Commission staff suspects that this remaining discrepancy is due to multiple minor errors over the course of the life of the PAC.

A detailed list of all unreported transactions is attached. Many of these payments seem to be for food or personal purposes such as travel, and do not coincide with any candidate election. It is unclear how these expenditures relate to any candidate or ballot question election. The majority of the unreported \$16,047.64 in expenditures occurred during the following time periods:

Report	Time Period	Total Unreported	Reported
Report	Time Terrod	Transactions	Transactions
2014 January Quarterly	10/01/2013 - 12/31/2013	\$9,777.26	\$2,447.00
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2015 April	01/01/2015 - 03/31/2015	\$1,791.96	\$9.91
Quarterly	01/01/2013 - 03/31/2013	Ψ1,771.70	Ψ7.71
2018 January	10/01/2017 – 12/31/2017	\$2,606.00	\$15.60
Quarterly	10/01/2017 - 12/31/2017	φ ∠, 000.00	φ1 <i>3</i> .00

If the PAC's major purpose were to influence elections and the PAC was required to report <u>all</u> expenditures, the above three referenced reports would not have substantially conformed to the requirements for PACs to report their expenditures under 21-A M.R.S. §§ 1060(4) & (7). A report that is substantially non-conforming is treated as if it were unfiled. 21-A M.R.S. § 1062-A(2). The maximum penalties for each report are \$10,000. <u>Id.</u> at 4. Prior to 2018, when the Commission's preliminary penalty calculations doubled in response to a 2016 citizen initiative, the Commission generally imposed penalties of \$500 for late filed reports.

At the present time, the Commission staff is not prepared to recommend the position that these three reports failed to substantially conform to disclosure requirements. If the major purpose of Working Families PAC was not influencing Maine state elections, the PAC would have been required to report only those transactions made for purposes of influencing a campaign. 21-A M.R.S. § 1060(7). We believe the evidence presently available is insufficient to support a conclusion that the PAC's major purpose was to

influence elections.² In order for the Commission staff to recommend additional penalties, the Commission staff would need to gather more information, likely by conducting an investigative deposition of Ms. Russell by the Commission staff or by receiving testimony at a public hearing. The Commission staff suspects that this process would be time consuming because Ms. Russell has not made herself available to the Commission staff during this investigation and all of the information was obtained through third parties.

Currently, the Commission has already imposed \$5,000 in penalties against Ms. Russell, and the Commission staff is also recommending further penalties for making unreported contributions to Ms. Russell's 2016 State Senate campaign that were over the contribution limit. If the Commission staff determines that the major purpose of the Working Families PAC was to influence an election, then the Commission staff would recommend an additional \$1,500 penalty against Ms. Russell.

The Commission staff will pursue any direction you would like, but we question the value of investing further staff time in this investigation, due to the factual obstacles to concluding that the major purpose of the PAC was to influence elections (please see footnote 2), the age of the unreported transactions (most are 5-8 years old), and other demands on the time of the Commission staff this fall. As of October 18, 2021, the new reporting obligations for PACs and BQCs go into effect. The Commission staff is coordinating with the Commission's E-Filing vendor to make the appropriate changes, updating paper forms, preparing written guidance, and preparing a CLE course, all of which should be completed prior to the new requirements take effect. These tasks are in addition to working on other investigations and routine tasks.

Given the foregoing considerations, the Commission staff is requesting further guidance from the Commission. The Commission could:

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² The PAC's financial records disclose that the PAC made \$1,750 in contributions to support candidates, but its expenditures were over \$55,000. (Only 3% of the PAC's lifetime expenditures went to influence an election.) An additional \$2,000 was donated (although unreported) to Ms. Russell's candidate accounts. The majority of other transactions (reported or otherwise), went to meals, travel, and transfers to her personal accounts.

- Subpoena Ms. Russell to appear at a meeting of the Commission. The Commissioners could engage in fact-finding and determine the major purpose of the Working Families PAC.
- The Commission staff could subpoena Ms. Russell for an investigative deposition by Commission staff. Due to the Commission staff's other obligations, the Commission staff would look to conduct that deposition sometime in November or December.
- The Commission could conclude the investigation into the Working Families
 PAC and take no further action concerning the PAC's unreported expenditures.

We regret being unable to recommend penalties at this time, but we believe it is prudent to apply 21-A M.R.S. §§ 1060(4) & (7) conservatively in this case. The Commission has already assessed penalties totaling \$5,000 against the PAC and Ms. Russell for more recent reporting failures, which will need to be collected by the Office of the Attorney General. The Commission has improved its laws and procedures to minimize the risk of this type of under-reporting by a leadership PAC again:

- the Legislature accepted a Commission proposal that PACs need to report <u>all</u>
 expenditures from the PAC bank account regardless of the major purpose of the
 PAC. This new law takes effect October 18, 2021;
- after each filing deadline, the Commission staff advises PAC officers of the PAC's reported cash balance and request that the officers contact us if the reported balance is incorrect; and
- the staff now conducts its compliance reviews of PAC campaign finance reports
 more systematically and has started conducting enhanced reviews of selected
 PACs by examining bank records.

Thank you for your attention in this matter.

Working Families PAC Unreported Transactions

Date	Amount	Description
May 2013	\$99.65	Deposited more than was reported
7/1/2013	\$41.27	The Village Kitchen
7/4/2013	\$142.18	Withdrawal to Walmart
7/4/2013	\$60.00	Transfer to Personal Account
7/5/2013	\$13.64	Fed Ex
7/23/2013	\$9.50	Washington Metrorail
7/29/2013	\$86.89	Transfer to personal account to satisfy negative balance
8/9/2013	\$15.00	Payment to Katie Made Portland
8/15/2013	\$3.75	Payment to Katie Made Portland
8/27/2013	\$6.31	Hilltop Coffee Portland
9/10/2013	\$25.00	Binga's Stadium Smoke Portland
9/17/2013	\$8.56	Hilltop Coffee Portland
9/20/213	\$42.71	7-Eleven
9/23/2013	\$3.83	Twitter Advertising
9/24/2013	\$7.34	FedEx
9/25/2013	\$0.22	Transfer to personal account to
	Φ12.00	satisfy negative balance
10/02/13	\$12.00	Uber Technologies
10/02/13	\$28.00	Uber Technologies
10/02/13	\$17.00	The Liaison
10/02/13	\$55.05	TGI Fridays
10/02/13	\$36.00	Portland Airport Park
10/02/13	\$3.89	Twitter Advertising
10/04/13	\$7.06	Hilltop Coffee
10/05/13	\$98.19	Ribollita
10/05/13	\$6.37	Robinson Pittsfield
10/05/13	\$7.11	Tim Hortons
10/05/13	\$33.27	7-Eleven

Date	Amount	Description
10/06/13	\$18.20	Giacomo's
10/06/13	\$42.64	Michaels Stores
10/06/13	\$29.13	Uno Chicago Grill
10/06/13	\$76.85	Books a Million
10/06/13	\$41.17	Falmouth Irving
10/07/13	\$13.03	Hobby Lobby
10/07/13	\$25.00	Sea Dog Brewing
10/07/13	\$21.28	Nocturnem Draft Haus
10/07/13	\$23.24	Artemisia Café
10/07/13	\$35.76	Circle K
10/07/13	\$7.29	Matsumoto Joe
10/07/13	\$4.53	McDonalds
10/07/13	\$4.55	Coffee Express, Inc.
10/07/13	\$6.63	Opera House Internet
10/08/13	\$300.00	Havana
10/08/13	\$361.60	Delta Air
10/09/13	\$30.00	Drug Policya
10/10/13	\$23.80	Leonardos Pizza
10/10/13	\$27.00	The Front Room
10/10/13	\$4.59	Hilltop Coffee
10/10/13	\$4.83	Twitter Advertising
10/11/13	\$300.00	Transfer to Personal Account
10/12/13	\$152.58	Staples
10/12/13	\$19.80	Pai Men Miyake
10/14/13	\$6.33	Michaels Stores
10/15/13	\$50.00	Maine League of Y
10/16/13	\$46.00	USPS
10/16/13	\$300.00	Transfer to Personal Account

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Date	Amount	Description
10/17/13	\$150.00	ActBlue Donate to Dems
10/17/13	\$41.56	Pai Men Miyake
10/17/13	\$2.16	Hilltop Coffee
10/17/13	\$100.00	Draft 704
10/18/13	\$2.37	Twitter Advertising
10/18/13	\$4.32	Hilltop Coffee
10/19/13	\$33.00	Otto Pizza
10/19/13	\$46.21	Michaels Stores
10/20/13	\$82.74	Fedex
10/21/13	\$6.47	Hilltop Coffee
10/21/13	\$43.79	7-Eleven
10/21/13	\$4.21	Hilltop Coffee
10/22/13	\$1.00	City of Portland
10/23/13	\$300.00	Transfer to Personal Account
10/23/13	\$2.16	Hilltop Coffee
10/24/13	\$85.00	Boda
10/25/13	\$111.83	Staples
10/26/13	\$25.00	Delta Air
10/28/13	\$31.73	Park and Company
10/28/13	\$35.88	Appaloosa Grill
10/28/13	\$4.89	Coffee by Design Indi
10/28/13	\$8.07	Einsteins Bagels
10/28/13	\$25.00	Delta Air
10/28/13	\$14.53	DNC Travel
10/29/13	\$29.84	Saeng Thai House

Date	Amount	Description
10/29/13	\$71.76	Sheraton
10/29/13	\$53.73	SW Garden Plaus
10/29/13	\$31.64	Rite Aid
10/29/13	\$25.68	Otto Pizza
10/29/13	\$1,249.00	3DNA-Nationbuilder
10/29/13	\$100.00	NFWL Capital Eventbrite
10/29/13	\$4.21	Hilltop Coffee
10/30/13	\$27.01	Trader Joe's
10/30/13	\$3.69	Hilltop Coffee
10/31/13	\$9.56	Katie Made Bakery, LLC
10/31/13	\$12.33	Joe's Smoke Shop
10/31/13	\$14.83	Panera Bread
10/31/13	\$33.58	Falmouth Irving
10/31/13	\$5.00	Checking Fee
11/01/13	\$13.01	Katie Made Bakery, LLC
11/01/13	\$1.00	Travelocity.com
11/01/13	\$265.80	JetBlue
11/01/13	\$127.42	Staples
11/01/13	\$500.00	Draft 705
11/02/13	\$2.00	City of Portland
11/04/13	\$28.00	The Snug, LLC
11/04/13	\$17.00	East End Cupcakes
11/04/13	\$45.00	Concord Coach Line
11/04/13	\$9.16	Transfer to Personal Account
11/05/13	\$38.30	Harry's
	10/29/13 10/29/13 10/29/13 10/29/13 10/29/13 10/29/13 10/29/13 10/30/13 10/30/13 10/31/13 10/31/13 10/31/13 11/01/13 11/01/13 11/01/13 11/01/13 11/01/13 11/04/13 11/04/13	10/29/13 \$71.76 10/29/13 \$53.73 10/29/13 \$31.64 10/29/13 \$25.68 10/29/13 \$1,249.00 10/29/13 \$100.00 10/29/13 \$4.21 10/30/13 \$27.01 10/30/13 \$3.69 10/31/13 \$12.33 10/31/13 \$14.83 10/31/13 \$14.83 10/31/13 \$5.00 11/01/13 \$13.01 11/01/13 \$1.00 11/01/13 \$127.42 11/01/13 \$265.80 11/01/13 \$200.00 11/02/13 \$2.00 11/04/13 \$17.00 11/04/13 \$45.00 11/04/13 \$9.16

Date	Amount	Description
11/05/13	\$154.58	Hotel Harrington
11/05/13	\$12.35	Starbucks
11/05/13	\$12.25	Sarbjeet Singh
11/05/13	\$120.65	Asia Nine Bar & Lounge
11/05/13	\$4.32	Hilltop Coffee
11/05/13	\$9.80	DC Taxi
11/06/13	\$8.82	Taxi Charge
11/06/13	\$6.00	Amtrak
11/06/13	\$8.00	Concord Coach Line
11/06/13	\$13.23	Nature's Kitchen
11/07/13	\$6.00	Amtrak
11/09/13	\$29.84	Saeng Thai House
11/10/13	\$44.00	Actionsprout.com
11/11/13	\$4.32	Hilltop Coffee
11/11/13	\$313.11	Briteverify
11/11/13	\$2.16	Hilltop Coffee
11/11/13	\$4.21	Hilltop Coffee
11/12/13	\$4.21	Hilltop Coffee
11/12/13	\$45.00	7-Eleven
11/13/13	\$23.00	Otto Pizza
11/13/13	\$5.72	Hilltop Coffee
11/14/13	\$4.32	Hilltop Coffee
11/14/13	\$4.32	Hilltop Coffee
11/15/13	\$13.34	Po-Boys & Pickles
11/15/13	\$4.21	Hilltop Coffee

Date	Amount	Description
11/16/13	\$12.00	Katie Made Bakery, LLC
11/16/13	\$4.89	Coffee by Design Indi
11/18/13	\$6.37	Hilltop Coffee
11/18/13	\$5.83	Hilltop Coffee
11/18/13	\$74.79	Staples
11/18/13	\$80.00	Draft 708
11/20/13	\$12.50	Katie Made Bakery, LLC
11/20/13	\$5.82	Hilltop Coffee
11/20/13	\$46.30	7-Eleven
11/21/13	\$6.83	Coffee by Design Wash
11/22/13	\$1.62	Hilltop Coffee
11/25/13	\$10.06	ExxonMobile
11/25/13	\$220.00	Draft 711
11/26/13	\$15.00	Coffee by Design Indi
11/28/13	\$1,249.00	3DNA-Nationbuilder
11/28/13	\$25.01	7-Eleven
11/30/13	\$5.00	Checking Fee
12/01/13	\$34.60	Mallard Mart
12/10/13	\$44.00	Actionsprout.com
12/12/13	\$15.81	The Neat Company
12/13/13	\$50.00	Draft 706
12/16/13	\$100.00	Draft 710
12/16/13	\$29.23	Transfer to Personal Account
12/17/13	\$39.17	Transfer to Personal Account
12/17/13	\$600.00	Transfer to Personal Account

Date	Amount	Description
12/17/13	\$50.00	Draft 709
12/26/13	\$14.93	Transfer to Personal Account
12/31/13	\$5.00	Checking Fee
1/6/2014	\$15.81	The Neat Company Unreported
1/18/2014	\$200.00	Transfer to Personal Account
1/21/2014	\$100.00	Transfer to Personal Account
1/31/2014	\$100.00	Check Withdrawal
2/12/2014	\$1.26	Transfer to Personal Account
2/14/2014	\$24.91	Transfer to Personal Account
2/18/2021	\$175.00	Transfer to Personal Account
3/13/2014	\$600.00	Transfer to Personal Account
5/2/2014	\$30.00	Cash Withdrawal
5/14/2014	\$250.00	Transfer to Personal Account
6/25/2014	\$4.32	Hilltop Coffee, unreported
6/10/2014	\$85.00	Cash withdrawal and \$5 ATM Fee
7/7/2014	\$59.01	Virgin Mobile
7/10/2014	\$55.84	Virgin Mobile
7/11/2014	\$7.76	Crema Coffee
7/23/2014	\$41.37	Transfer to Personal Account
7/23/2014	\$3.94	Hilltop Coffee
7/24/2014	\$5.09	Breau's Too Bryant Pond
7/25/2014	\$19.60	USPS
7/25/2014	\$36.16	MS's Wine Bar
7/31/2014	\$5.82	Hilltop Coffee
7/31/2014	\$400.00	Transfer to Personal Account
8/3/2014	\$44.23	Circle K

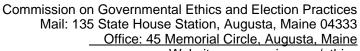
Date	Amount	Description
8/4/2014	\$6.75	Hilltop Coffee Portland
8/8/2014	\$7.54	Super Joe's Variety
8/13/2014	\$45.02	Sunoco
8/18/2014	\$17.20	NY Times Sales
8/23/2014	\$102.00	ATM withdrawal and \$2 fee
8/25/2014	\$4.21	Hilltop Coffee
8/31/2014	\$5.00	Bank Fee
9/11/2014	\$2.80	Coffee by design
9/11/2014	\$25.80	Blue Spoon Portland ME
9/21/2014	\$100.00	Transfer to Personal Account
9/23/2014	\$100.00	Transfer to Personal Account
10/8/2014	\$1.00	WPY Action Network
10/16/14	\$400.00	Transfer to Personal Account
10/20/14	\$25.00	Banadir Taxi Portland Maine
10/23/14	\$30.00	Hot Suppa Portland
11/7/2014	\$1.00	WPY Action Network
11/18/14	\$23.00	ATM Withdrawal and fee
11/19/14	\$115.00	ATM Withdrawal and fee
Dec. 2014	\$960.13	Aggregate Unreported Transactions
01/01/15	\$4.21	Hilltop Coffee
01/04/15	\$14.69	Oxford Irving
01/05/15	\$36.29	NY Times Natl Sales
01/15/15	\$1,300.00	Transfer to Personal Account
01/06/15	\$20.00	7-Eleven
01/12/15	\$61.15	SW Garden Plaus
01/13/15	\$19.96	7-Eleven

Date	Amount	Description
01/14/15	\$20.00	ATM Five County
01/15/15	\$15.26	Falmouth Irving
01/18/15	\$5.00	Uber Technologies
01/20/15	\$26.23	7-Eleven
01/21/15	\$3.15	Cross Café
01/22/15	\$6.54	Oreilly Auto Parts
01/22/15	\$4.21	Hilltop Coffee
01/23/15	\$6.78	Uber Technologies
01/26/15	\$13.07	Uber Technologies
01/27/15	\$9.64	Uber Technologies
01/27/15	\$12.64	Uber Technologies
01/27/15	\$30.00	Overdrawn at ATM
01/31/15	\$5.00	Checking Fee
02/28/15	\$5.00	Bank Fee
03/07/15	\$14.74	Microsoft Office
03/07/15	\$32.53	7-Eleven
03/09/15	\$5.82	Hilltop Coffee
03/27/15	\$30.38	Orchid Thai Restaurant
03/27/15	\$2.16	Hilltop Coffee
03/28/15	\$95.40	Shaw's
03/28/15	\$7.37	Microsoft Office
03/31/15	\$5.00	Checking Fee
04/02/15	\$2.16	Hilltop Coffee
04/29/15	\$2.43	Hilltop Coffee
10/22/15	\$32.02	Seven Eleven

Date	Amount	Description
11/03/15	\$43.11	Circle K
11/03/15	\$28.42	Falmouth Irving
11/03/15	\$11.88	Dysart's Travel Stop
11/05/15	\$25.00	Dysart's Truck Stop
11/06/15	\$24.52	Shell Serve Station
11/09/15	\$700.00	Transfer to Personal Account
11/11/15	\$223.00	Transfer to Personal Account
11/12/15	\$250.00	Transfer to Personal Account
11/12/15	\$19.46	Arabica Coffee
11/12/15	\$6.00	One City Center Assoc.
11/13/15	\$155.26	Travelocity.com
11/13/15	\$200.00	Transfer to Personal Account
11/14/15	\$100.00	Transfer to Personal Account
11/14/15	\$100.00	Transfer to Personal Account
11/17/15	\$100.00	Transfer to Personal Account
11/17/15	\$200.00	Transfer to Personal Account
11/17/15	\$100.00	Transfer to Personal Account
11/18/15	\$50.00	Transfer to Personal Account
11/18/15	\$50.00	Transfer to Personal Account
11/19/15	\$25.00	Emerge America
11/27/15	\$160.00	Transfer to Russell Candidate
11/2//13	\$100.00	Account
11/27/15	\$200.00	Transfer to Russell Candidate
		Account Transfer to Russell Candidate
11/30/15	\$200.00	Account

Date	Amount	Description
11/30/15	\$5.00	Checking Fee
12/06/15	\$100.00	Transfer to Personal Account
12/08/15	\$100.00	Transfer to Personal Account
12/12/15	\$100.00	Transfer to Personal Account
12/12/15	\$100.00	Transfer to Personal Account
12/13/15	\$100.00	Transfer to Personal Account
12/23/15	\$100.00	Transfer to Russell Candidate
12/23/15	Ψ100.00	Account
12/26/15	\$100.00	Transfer to Personal Account
12/31/15	\$5.00	Checking Fee
12/23/15	\$100.00	Transfer to Russell Candidate
12/23/13	Ψ100.00	Account
01/23/16	\$1,000.00	ME Comm Gov't Ethics
01/31/16	\$5.00	Checking Fee
02/11/16	\$20.29	Gulf Oil
02/18/16	\$59.03	Virgin Mobile USA
02/23/16	\$60.00	Transfer to Personal Account
02/25/16	\$18.98	Staples
02/26/16	\$21.23	Circle K

Date	Amount	Description
02/29/16	\$5.00	Checking Fee
Mar. 2016	\$151.74	Aggregate Unreported Transactions
05/16/16	\$100.00	Transfer to Personal Account
06/30/16	\$5.00	Bank Fee
07/05/16	\$7.93	Goodwill
Oct. 2017	\$2,000.00	Transfer to Personal Account
Oct. 2017	\$600.00	Transfer to Candidate Account
10/01/17	\$100.00	Transfer to Candidate Account
10/07/17	\$100.00	Transfer to Candidate Account
10/10/17	\$100.00	Transfer to Candidate Account
10/14/17	\$200.00	Transfer to Candidate Account
10/25/17	\$2,000.00	Transfer to Personal Account
10/28/17	\$100.00	Transfer to Candidate Account
11/02/17	\$100.00	Transfer to Candidate Account
11/03/17	\$200.00	Transfer to Candidate Account
11/03/17	\$250.00	Transfer to Candidate Account
11/18/17	\$150.00	Transfer to Candidate Account
12/07/17	\$6.00	Transfer to Candidate Account



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

Phone: 207-287-4179 Fax: 207-287-6775



FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER		
WORKING FAMILIES PAC		EIRANNE HART CHI	RISTY	
128R NORTH ST		468 WEBBS MILL RI		
PORTLAND, ME 04101		RAYMOND, ME 04071		
PHONE: (207) 272-9182		PHONE: (207) 478-1268		
EMAIL: DIANERUSSELL207@GMAIL.COM		EMAIL: EIRANNE.HART@YAHOO.COM		
REPORT DUE		DATE REPORTING PERIOD		
JANUARY QUARTERLY	01/15	5/2014 10/01/2013 - 12/31/2013		

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$9,106.90	\$26,456.80
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$21.10	\$21.10
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$9,128.00	\$26,477.90
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$2,447.00	\$17,911.24
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$2,447.00	\$17,911.24
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$2,815.33	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$9,128.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$2,447.00	
12. CASH BALANCE AT END OF PERIOD	\$9,496.33	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$8,447.00	

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

REPORT FILED BY: EIRANNE HART CHRISTY REPORT FILED ON: 01/15/2014 LAST MODIFIED: 10/20/2015 PRINTED: 06/30/2018 COMMITTEE ID: 6537

SCHEDULE A CASH CONTRIBUTIONS

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

Contributor Types

1 = Individual 9 = Candidate / Candidate Committee

2 = Candidate/ Spouse/ Domestic Partner 10 = General Treasury Transfer

3 = Commercial Source11 = Transfer from Previous Campaign4 = Nonprofit Organization12 = Contributors giving \$50 or less5 = Political Action Committee13 = Contributors giving \$100 or less6 = Political Party Committee14 = Contributors giving \$200 or less

7 = Ballot Question Committee 15 = MCEA Payment 8 = Other Candidate/ Candidate Committee 16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	TYPE	AMOUNT
5/9/2011	CONTRIBUTORS GIVING \$50 OR LESS		12	\$25.00
10/8/2013	PATRICIA CROCKETT 295 FALLOW RUN SW HUNT, TX 78024	RETIRED DESCRIPTION: Teacher/Education	1	\$100.00
10/8/2013	LANCE DIXON 1504 MAPLECREST DR CHAMPAIGN, IL 61821	DIXON GRAPHICS DESCRIPTION: PRINTER	1	\$100.00
10/8/2013	REBECCA ERICKSON PO BOX 496 ASHLAND, MO 65010	NOT EMPLOYED DESCRIPTION: Not Currently Employed	1	\$100.00
10/8/2013	SANDRA JOLLY 2490 SE MARSEILLE ST PORT SAINT LUCIA, FL 34952	NONE DESCRIPTION: HOMEMAKER	1	\$100.00
10/8/2013	EDWARD OLSON 3100 SYCKELMOORE ST TRENTON, MI 48183	NOT EMPLOYED DESCRIPTION: Not Currently Employed	1	\$100.00
10/8/2013	PATRICIA TUNTLAND 2816 N WILSON AVE TUSCON, AZ 85719	RETIRED DESCRIPTION: Retired	1	\$100.00
10/9/2013	DAVID REICHERT 5431 S. COMPASS RD. TEMPE, AZ 85283	RETIRED DESCRIPTION: Retired	1	\$25.00
10/18/2013	SUSAN HOLLINGSWORTH 15700 SOUTH PARK BLVD SHAKER HEIGHTS, OH 44120	TRI-C DESCRIPTION: Teacher/Education	1	\$250.00
10/30/2013	LYNNE BARNES 180 PEACE PIPE DRIVE BOZEMAN, MT 59715	NOT EMPLOYED DESCRIPTION: Not Currently Employed	1	\$25.00

11/1/2013	REBECCA ERICKSON PO BOX 496	NOT EMPLOYED	1	\$10.00
	ASHLAND, MO 65010	DESCRIPTION: Not Currently Employed		
11/9/2013	DAVID REICHERT 5431 S. COMPASS RD. TEMPE, AZ 85283	RETIRED DESCRIPTION: Retired	1	\$25.00
11/13/2013	PAUL IMRIE 522 S WOOD AVE FAYETTEVILLE, AR 72701	SELF DESCRIPTION: WOODWORKER	1	\$100.00
11/30/2013	LYNNE BARNES 180 PEACE PIPE DRIVE BOZEMAN, MT 59715	NOT EMPLOYED DESCRIPTION: Not Currently Employed	1	\$25.00
12/3/2013	BENJAMIN BAXT 340 CLINTON STREET BROOKLYN, NY 11231	BAXT INGUI ARCHITECT DESCRIPTION: Other	1	\$250.00
12/3/2013	DOUG LEDFORD UNIT 86 MORRISVILLE, NC 27560	RED HAT, INC. DESCRIPTION: Science/Technology	1	\$100.00
12/4/2013	LOCKE MCCORKLE 1011 FULTON ST. PALO ALTO, CA 94301	SELF DESCRIPTION: BUSINESSMAN	1	\$75.00
12/9/2013	DAVID REICHERT 5431 S. COMPASS RD. TEMPE, AZ 85283	RETIRED DESCRIPTION: Retired	1	\$25.00
12/30/2013	CONTRIBUTORS GIVING \$50 OR LESS		12	\$7,546.90
12/30/2013	LYNNE BARNES 180 PEACE PIPE DRIVE BOZEMAN, MT 59715	NOT EMPLOYED DESCRIPTION: Not Currently Employed	1	\$25.00
		TOTAL CASH CONTRIBU	JTIONS	\$9,106.90

SCHEDULE B-1 OPERATING EXPENDITURES

	EXPENDITURES TYPES						
CNS	Campaig	n consultants		POL	Polling and survey re	search	
CON	Contribut	ion to other candidate, party, committee	:	POS	Postage for U.S. Mail	and mail bo	ox fees
EQP	Equipme	nt (office machines, furniture, cell phone	es, etc.)	PRO	Other professional se	ervices	
FND	Fundraisi	ing events		PRT	Print media ads only	(newspaper	s, magazines, etc.)
FOD	Food for	campaign events, volunteers		RAD	Radio ads, production	n costs	
LIT	Print and	graphics (flyers, signs, palmcards, t-shi	rts, etc.)	SAL	Campaign workers' salaries and personnel costs		
MHS	Mail hous	se (all services purchased)		TRV	Travel (fuel, mileage, lodging, etc.)		
OFF	Office rer	nt, utilities, phone and internet services,	supplies	TVN	TV or cable ads, production costs		
ОТН	Other			WEB	Website design, regis	stration, hos	ting, maintenance, etc.
PHO	Phone ba	anks, automated telephone calls					
	E OF IDITURE	PAYEE		REM	ARK	TYPE	AMOUNT
10/30	10/30/2013 Starting Point Ops PO Box 717 Lewiston, ME 04243						\$2,447.00
	TOTAL OPERATING EXPENDITURES					\$2,447.00	

SCHEDULE D UNPAID DEBTS AND OBLIGATIONS

- A debt or obligation is incurred if a committee places an order for a good or service without making a payment; makes a promise or agreement to pay for a good or service; signs a contract for a good or service; or receives delivery of a good or service for which the committee has not paid.
- This schedule is a list of all debts and obligations of the committee as of the end of this reporting period.

DATE OF OBLIGATION	CREDITOR	DESCRIPTION	AMOUNT
7/15/2013	PowerThru LLC 1740 Hinesburg Road Richmond, ME 05477	FUNDRAISING	\$6,000.00
7/25/2013	Starting Point Ops PO Box 717 Lewiston, ME 04243	PHONE FUNDRAISING	\$2,447.00
		TOTAL UNPAID DEBTS AND OBLIGATIONS	\$8,447.00

Posting ID#/

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Page 4



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DIANE M RUSSELL

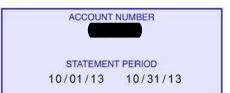
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Payment Credits FINANCE Fees or Transaction

	Date Transaction Description	or Debits CHARGE Charges Amount	Balance
]		Total For Total Year- This Period to-Date	
Total H	Returned Item Fees	60.00	
	Overdraft Fees	0 00 60 00	
		15 17 242 27	Amount
		Amount Number	Amount
10/01 ID 10/31	72 CAMPAIGN TO ELECT DIANE New Balance	RUSSEL Previous Balance	0.00
Dividends E	Earned Year to Date 0.0	00	(M. C.S.S.)
10/01 ID 10/02	73 RUSSELL WORKING FAMILIE Recurring Withdrawal De	ebit Card -12.00	981.26 969.26
10/02	Recurring Withdrawal De	Uber Technologies 866-5761039 CA ebit Card -28.00 Uber Technologies 866-5761039 CA	941.26
10/02	Withdrawal Debit Card	LIAISON CAPITOL H WASHINGTON DC	924.26
10/02	Withdrawal Debit Card	FRIDAYS #0792 WASHINGTON DC -55.05	869.21
10/02	Withdrawal Debit Card 10/02 071050 7523 PORTL	-36.00 LAND AIRPORT PARK PORTLAND ME	833.21
10/02	Withdrawal Debit Card 10/01 000801 7311 TWITT	-3.89 TER ADVERTISING 415-4264400 CA	829.32
10/04	Withdrawal Debit Card 10/03 040118 5812 HILLT	TOP COFFEE PORTLAND ME	822.26
10/05	Withdrawal Debit Card 10/03 056231 5812 RIBOL	LLITA PORTLAND ME	724.07
10/05 10/05	Withdrawal Debit Card 10/04 016674 5541 ROBIN Withdrawal Debit Card	NSON PITTSFIELD I PITTSFIELD ME -6.37 -7.11	717.70 710.59
10/05	10/05 072918 5814 TIM H Withdrawal Debit Card	HORTONS #910744 AUGUSTA ME -33.27	677.32
10/06	10/04 074365 5542 7-ELE Withdrawal Debit Card	EVEN 32532 PORTLAND ME -18.20	659.12
10/06	10/05 051865 5812 GIACO Withdrawal Debit Card	OMO'S BANGOR ME	616.48
10/06	10/05 054562 5970 MICHA Withdrawal Debit Card	AELS STORES 9557 AUGUSTA ME -29.13 HICAGOGRILL#831 BANGOR ME	587.35
10/06	Withdrawal Debit Card	-76.85	510.50
	10/05 057730 5942 BOOKS	S A MILLI00000163 BANGOR ME	

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Posting	ID#/	E	Payment Credits FINANCE	Fees or	Transaction	20.0
Date	Eff. Date	Transaction Description	or Debits CHARGE	Charges	Amount	Balance
10/06	Wit	chdrawal Debit Card 705 072477 5542 FALMOUTH 1	RVING FALMOUTH ME		-41.17	469.33
10/07	Wit	hdrawal Debit Card 05 092266 5945 HOBBY-LOBE			-13.03	456.30
10/07	Wit	chdrawal Debit Card			-25.00	431.30
10/07	Wit	04 070036 5812 SEA DOG BF chdrawal Debit Card			-21.28	410.02
10/07	Wit	04 095208 5812 NOCTURNEM			-23.24	386.78
10/07	Wit	05 059868 5812 ARTEMISIA			-35.76	351.02
10/07	Wit	'06 056432 5542 CIRCLE K O chdrawal Debit Card			-7.29	343.73
10/07	Wit	06 000002 5812 MATSUMOTO			-4.53	339.20
10/07	10/	06 018759 5814 MCDONALD'S posit by Check	F1930 ELLSWORTH ME		1478.91	1818.11
10/07	Wit	chdrawal Debit Card 706 084024 5812 COFFEE EXF	PRESS INC FLISWORTH ME		-4.55	1813.56
10/07	Wit	chdrawal Debit Card 706 038691 5812 OPERA HOUS			-6.63	1806.93
10/08	Wit	thdrawal Debit Card 707 039730 5812 HAVANA - E			-300.00	1506.93
10/08	Wit	chdrawal Debit Card 707 029300 3058 DELTA AIR			-361.60	1145.33
10/09	Wit	chdrawal Debit Card		1.7	-30.00	1115.33
10/10	Wit	07 063004 8398 DRUGPOLICY			-23.80	1091.53
10/10	Wit	09 041091 5814 LEONARDOS			-27.00	1064.53
10/10	Wit	09 096280 5812 THE FRONT			-4.59	1059.94
10/10	Wit	09 040185 5812 HILLTOP CO		25020	-4.83	1055.11
10/11	Der	09 081675 7311 TWITTER AD		CA	334.15	1389.26
10/11 10/12	Wit	chdrawal CyberBranch Trans chdrawal Debit Card			-300.00 -152.58	1089.26 936.68
10/12	Wit	11 062744 5943 STAPLES 00 chdrawal Debit Card			-19.80	916.88
10/14	10/ Wit	/11 043936 5812 PAI MEN MI chdrawal Debit Card			-6.33	910.55
10/15	10/	13 019848 5970 MICHAELS S chdrawal Debit Card	STORES 2045 SCARBOROUG	H ME	-50.00	860.55
10/16	10/	115 068823 8651 SQ *MAINE	LEAGUE OF Y Portland	ME	-46.00	814.55
10/16	10/	715 008765 9402 USPS 22690 chdrawal CyberBranch Trans	60103210110 PORTLAND	ME	-300.00	514.55
10/17	Wit	chdrawal Debit Card 716 097251 8651 ACTBLUE*DO		ιο ΜΛ	-150.00	364.55
10/17	Wit	chdrawal Debit Card 716 017290 5812 PAI MEN MI		UIIA	-41.56	322.99
10/17	Wit	thdrawal Debit Card 716 040194 5812 HILLTOP CO			-2.16	320.83

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					· ·	
Posting Date	ID # / Eff. Date	Transaction Description	Payment Credits FINANCE or Debits CHARGE	Fees or Charges	Transaction Amount	Balance
10/17 10/18	Wi	aft 000704 thdrawal Debit Card	DVEDTICING 445 4264400		-100.00 -2.37	220.83 218.46
10/18	Wi	/17 048019 7311 TWITTER A thdrawal Debit Card /17 040192 5812 HILLTOP C		CA	-4.32	214.14
10/19	Wi	thdrawal Debit Card		мг	-33.00	181.14
10/19	Wi	/17 056548 5814 OTTO PIZZ thdrawal Debit Card			-46.21	134.93
10/20	Wi:	/18 032682 5970 MICHAELS thdrawal Debit Card		H ME	-82.74	52.19
10/20	Dei	719 011045 7399 FEDEX OFF cosit Debit Card APLES 0011095 FALMOUTH ME te 10/19/13 082963 5943			21.10	73.29
10/21	Wi	te 10/19/13 082963 5943 thdrawal Debit Card /19 040123 5812 HILLTOP C			-6.47	66.82
10/21	Wi:	thdrawal Debit Card			-43.79	23.03
10/21	Dei	/19 087922 5542 7-ELEVEN	32332 PURILAND ME		3650.29	3673.32
10/21	10	thdrawal Debit Card /20 040188 5812 HILLTOP C	OFFEE PORTLAND ME		-4.21	3669.11
10/22	10	thdrawal Debit Card /21 053689 7523 CITY OF P	ORTLAND PORTLAND ME		-1.00	3668.11
10/23 10/23	Dei	thdrawal CyberBranch Tran posit by Check	ster to Share /1		-300.00 2000.00	3368.11 5368.11
10/23	10	thdrawai Debit Card /22 040165 5812 HILLTOP C	OFFEE PORTLAND ME		-2.16	5365.95
10/24	10	thdrawal Debit Card /23 090014 5812 BODA PORT	LAND ME		-85.00	5280.95
10/24 10/25	Wi:	posit by Check thdrawal Debit Card			778.83 -111.83	6059.78 5947.95
10/26	Wi	/24 099871 5943 STAPLES 0 thdrawal Debit Card		25	-25.00	5922.95
10/28	Wi	/25 043143 3058 DELTA AIR thdrawal Debit Card		7- 92-	-31.73	5891.22
10/28	Wi	/25 025687 5812 PARK AND thdrawal Debit Card			-35.88	5855.34
10/28	Wi	/26 090768 5812 APPALOOSA thdrawal Debit Card			-4.89	5850.45
10/28	Wi	/27 002371 5812 COFFEE BY thdrawal Debit Card		ME	-8.07	5842.38
10/28	10 Wi	/27 043141 5814 EINSTEINS thdrawal Debit Card			-25.00	5817.38
10/28	10 Wi	/27 041585 3058 DELTA AIR thdrawal Debit Card			-14.53	5802.85
10/29	10	/27 075016 5814 DNC TRAVE thdrawal Debit Card	L - DETRO DETROIT MI		-29.84	5773.01
10/29	10	/27 093987 5812 SAENG THA thdrawal Debit Card	I HOUSE REST PORTLAND	ME	-71.76	5701.25
10/29	10	/27 032134 3503 SHERATON thdrawal POS #878242	DENVER DENVER CO		-53.73	5647.52
10123	POS	S VESTA VIRGIN M 11950 SW RTLAND OR	GARDEN PLAUS		-00.70	5041.02
10/29	Wi	thdrawal Debit Card			-31.64	5615.88

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Page 7



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Posting Date	ID # / Eff. Date	Transaction Description	Payment Credits FINANCE or Debits CHARGE		Transaction Amount	Balance				
10/29	Wi	/28 049986 5912 RITE AID S thdrawal Debit Card			-25.68	5590.20				
10/29	Wi	//28 000846 5812 OTTO-108-E thdrawal Debit Card			-1249.00	4341.20				
10/29	Wi	10/29 032826 7379 3DNA-NATIONBUILDER 213-394-4623 CA Withdrawal Debit Card -100.00								
10/29	Wi	10/29 044327 7399 EB *2013 NFWL CAPITAL EVENTBRITE.CO CA Withdrawal Debit Card -4.21 10/28 040150 5812 HILLTOP COFFEE PORTLAND ME								
10/30	Wi	Withdrawal Debit Card -27.01 10/29 088700 5411 TRADER JOE'S #519 QPS PORTLAND ME Withdrawal Debit Card -3.69 10/29 040146 5812 HILLTOP COFFEE PORTLAND ME Draft 000701 -2447.00 Withdrawal Debit Card -9.56								
10/30	Wi									
10/30 10/31	Dr Wi									
10/31	10/30 080022 5814 KATIE MADE BAKERY LLC PORTLAND ME Withdrawal Debit Card -12.33 10/29 070306 5993 JOE'S SMOKE SHOP PORTLAND ME Withdrawal Debit Card -14.83									
10/31										
10/31	Wi	10/30 005649 5814 PANERA BREAD #3418 AUGUSTA ME Withdrawal Debit Card -33.58								
10/31 10/31 10/31 Dividen	De Wi Ne	0/30 019233 5542 FALMOUTH 1 eposit by Check thdrawal Checking Fee ew Balance earto Date 0.00	IRVING FALMOUTH ME		177.64 -5.00	1866.63 1861.63 1861.63				
			Total For 1 This Period	Total Yea to-Date						
Total Returned Item Fees				30.	00					
Total Returned Item Fees Total Overdraft Fees			0.00		00					

Number Amount Number Amount Number Amount

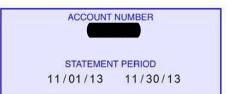
Asterisk next to number indicates skip in number sequence

Total Dividends Earned Year to Date 0.00

Account Balance Summary

Total Shares Balance | Total Loans Balance
PRIME SHARE 25.00
CLASSIC CHECKING 35.55
CAMPAIGN TO ELECT DIANE RUSSEL 0.00
RUSSELL WORKING FAMILIES PAC 1861.63

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Page 4



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DIANE M RUSSELL 184 CONGRESS ST APT #2 PORTLAND ME 04101

Posting Date	ID # / Eff. Date	Transaction Description	Payment Credi or Debits	ts FINANCE CHARGE	Fees or Charges	Transaction Amount	Balance
11/01	Wit	hdrawal Debit Card	SE BAKEBY II S	DODT! AND	ue.	-13.01	1848.62
11/01	Wit	31 090023 5814 KATIE MA hdrawal Debit Card				-1.00	1847.62
11/01	Wit	30 052472 4722 TRAVELOC hdrawal Debit Card				-265.80	1581.82
11/01	Wit	30 048359 3174 JETBLUE hdrawal Debit Card			I X	-127.42	1454.40
11/01 11/02	Dra Wit	31 062412 5943 STAPLES ft 000705 hdrawal Debit Card				-500.00 -2.00	954.40 952.40
11/04	Wit	01 047619 7523 CITY OF hdrawal Debit Card				-28.00	924.40
11/04	Wit	02 048039 5813 THE SNUG				-17.00	907.40
11/04	Wit	01 039289 5462 EAST END hdrawal Debit Card			1000 NII	-45.00	862.40
11/04	Wit	04 087175 4131 CONCORD hdrawal Transfer To Sha	re 71	603-228-3	3838 NH	-9.16	853.24
11/04 11/05	Dep Wit	SATSIFY NEGATIVE BALANC osit by Check hdrawal Debit Card 04 000072 5812 HARRY`S				72.01 -38.30	925.25 886.95
11/05	Wit	04 000072 3812 HARRY S hdrawal Debit Card 05 067860 7011 HOTEL HA		NCTON DC		-154.58	732.37
11/05	Wit	hdrawal Debit Card 04 074836 5814 STARBUCK			TON MA	-8.97	723.40
11/05	Dep STA	04 074030 3014 31ARBUCK osit Debit Card RBUCKS C PI1032150 EAST e 11/04/13 074836 5814		EAST BUST	ION HA	8.97	732.37
11/05	Wit	hdrawal Debit Card 04 074836 5814 STARBUCK	S C PT1032150	FAST BOST	ΓΩΝ ΜΔ	-12.35	720.02
11/05	Wit	hdrawal Debit Card 05 023982 7299 SQ *SARB				-12.25	707.77
11/05	Wit	hdrawal Debit Card 05 045944 5812 ASIA NIN				-120.65	587.12
11/05	Wit	hdrawal Debit Card 04 040161 5812 HILLTOP			50	-4.32	582.80
11/05	Wit	hdrawal Debit Card 04 031589 4121 DC TAXI				-9.80	573.00
11/06	Wit	hdrawal Debit Card 05 080726 7399 TAXI CHA				-8.82	564.18
11/06	Wit	hdrawal Debit Card 04 000909 4112 AMTRAK 3			MD	-6.00	558.18
11/06	Wit	hdrawal Debit Card 06 067049 7523 CONCORD				-8.00	550.18
11/06	Wit 11/	hdrawal Debit Card 05 089089 5814 NATURE'S	KITCHEN LINTH	TCUM MD	7.1	-13.23	536.95
11/07	Wit	hdrawal Debit Card 05 004411 4112 AMTRAK 3			OC.	-6.00	530.95
11/09	Wit	hdrawal Debit Card 07 093219 5812 SAENG TH				-29.84	501.11
11/10	Rec	urring Withdrawal Debit 09 080936 7392 ACTIONSP	Card			-44.00	457.11
11/11	Wit	hdrawal Debit Card		00-1100 V	wat	-4.32	452.79

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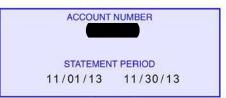


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DIANE M RUSSELL 184 CONGRESS ST APT #2 PORTLAND ME 04101

Posting Date		ees or	Transaction Amount	Balance
Date		larges	Amount	Dalance
11/11	11/09 040170 5812 HILLTOP COFFEE PORTLAND ME Recurring Withdrawal Debit Card		-313.11	139.68
11/11	11/10 036874 5045 BRITEVERIFY 980-621-1625 NC Withdrawal Debit Card		-2.16	137.52
	11/10 040120 5812 HILLTOP COFFEE PORTLAND ME			
11/11	Withdrawal Debit Card 11/10 040168 5812 HILLTOP COFFEE PORTLAND ME		-4.21	133.31
11/12 11/12	Deposit by Check Withdrawal Debit Card		364.93	498.24 494.03
11/12	11/11 040147 5812 HILLTOP COFFEE PORTLAND ME Withdrawal Debit Card		-45.00	449.03
	11/12 012549 5542 7-ELEVEN 32532 PORTLAND ME			
11/13	Withdrawal Debit Card 11/11 059668 5814 OTTO PIZZA-PORTLAND 2 PORTLAND ME		-23.00	426.03
11/13	Withdrawal Debit Card 11/12 040170 5812 HILLTOP COFFEE PORTLAND ME		-5.72	420.31
11/14	Withdrawal Debit Card		-4.32	415.99
11/14	11/13 040166 5812 HILLTOP COFFEE PORTLAND ME Withdrawal Debit Card		-4.32	411.67
11/15	11/13 040121 5812 HILLTOP COFFEE PORTLAND ME Deposit by Check		616.68	1028.35
11/15	Withdrawal Debit Card		-13.34	1015.01
11/15	11/14 020042 5812 PO-BOYS & PICKLES PORTLAND ME Withdrawal Debit Card		-4.21	1010.80
11/16	11/14 040172 5812 HILLTOP COFFEE PORTLAND ME Withdrawal Debit Card		-12.00	998.80
	11/15 010014 5814 KATIE MADE BAKERY LLC PORTLAND ME			
11/16	Withdrawal Debit Card 11/15 084172 5812 COFFEE BY DESIGN INDI PORTLAND ME		-4.89	993.91
11/18	Withdrawal Debit Card 11/16 040171 5812 HILLTOP COFFEE PORTLAND ME		-6.37	987.54
11/18	Withdrawal Debit Card 11/15 040141 5812 HILLTOP COFFEE PORTLAND ME		-5.83	981.71
11/18	Withdrawal Debit Card		-74.79	906.92
11/18	11/17 077216 5943 STAPLES 0011095 FALMOUTH ME Draft 000708		-80.00	826.92
11/20	Withdrawal Debit Card 11/19 040017 5814 KATIE MADE BAKERY LLC PORTLAND ME		-12.50	814.42
11/20	Withdrawal Debit Card		-5.82	808.60
11/20	11/19 040149 5812 HILLTOP COFFEE PORTLAND ME Withdrawal Debit Card		-46.30	762.30
11/21	11/19 064203 5542 7-ELEVEN 32532 PORTLAND ME Withdrawal Debit Card		-6.83	755.47
	11/20 057757 5812 COFFEE BY DESIGN WASH PORTLAND ME			
11/22 11/22	Deposit by Check Withdrawal Debit Card 11/21 040155 5812 HILLTOP COFFEE PORTLAND ME		789.10 -1.62	1544.57 1542.95
11/25	11/21 040155 5812 HILLTOP COFFEE PORTLAND ME		-10.06	1532.89
	Withdrawal Debit Card 11/24 020451 5542 EXXONMOBIL 9758970 PORTLAND ME		10/2010 10/01	
11/25 11/26	Draft 000711 Withdrawal Debit Card		-220.00 -15.00	1312.89 1297.89
11/28	11/25 069144 5812 COFFEE BY DESIGN INDI PORTLAND ME Withdrawal Debit Card		-1249.00	48.89
20	11/28 038435 7379 3DNA-NATIONBUILDER 213-394-4623 C	Α	.2.0.00	10.00

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Page 6

0.00

DIANE M RUSSELL

184 CONGRESS ST APT #2 PORTLAND ME 04101

The Holiday SKIP A PAY Season is back!!! Skip your Dec or Jan loan payment.

 $iPad(TM) \ \ Give away \ - \ See \ \ Contest \ Rules \ at \\ five county.com/ipad.htm \ - \ \ Use \ \ Your \ \ FCCU$ Visa Credit Card from thru 12/31/13 to be entered to WIN an iPad(TM)!!! OPEN A CHRISTMAS CLUB TODAY! Or increase your current club amount & make your next Holiday Season a whole lot jollier!

Posting ID Date Eff. I		Payment Credits FINANC or Debits CHARC		ransaction Amount	Balance
1/28	Withdrawal Debit Card	N 20520 DODTI AND ME		-25.01	23.88
1 / 30 1 / 30 Dividends Ea	11/28 066566 5542 7-ELEVE Withdrawal Checking Fee New Balance arned Year to Date 0.00	N 32332 PURILAND ME		-5.00	18.88 18.88
				_	
		Total For This Period	Total Year- to-Date		
Total R	eturned Item Fees	Total For This Period		-	

Number Amount Amount Number Amount Number Number Amount

Asterisk next to number indicates skip in number sequence

Total Dividends Earned Year to Date

Acc	count Balanc	ce Summarv	
Total Shares PRIME SHARE CLASSIC CHECKING CAMPAIGN TO ELECT DIANE RUSSEL RUSSELL WORKING FAMILIES PAC	Balance 25.00 -6.18 0.00 18.88	Total Lóans	Balance
(A.D.A.B.)	37.70	,	

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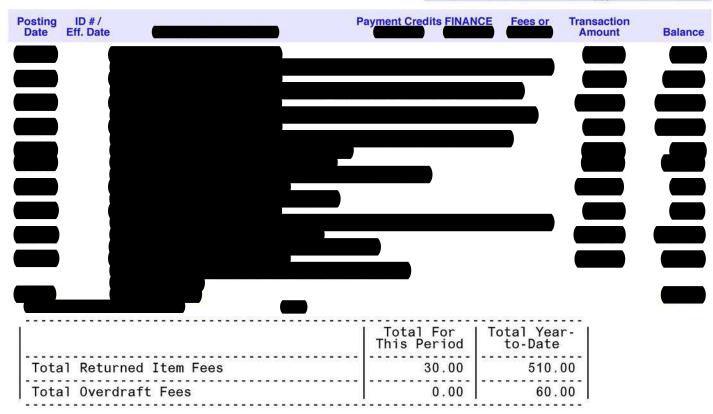






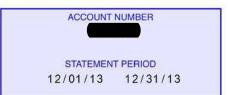
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12/01 ID 72 12/31	2 CAMPAIGN TO ELECT DIANE RUSSEL Previous Balance New Balance		0.00
	ned Year to Date 0.00		0.00
12/01 ID 73	RUSSELL WORKING FAMILIES PAC Previous Balance		18.88
12/01	Withdrawal Debit Card 11/30 014876 5542 MALLARD MART WEST PARIS ME	-34.60	-15.72
12/05	Deposit Transfer From Share 71	15.72	0.00
12/06	Deposit by Check	86.41	86.41
12/10	Recurring Withdrawal Debit Card 12/09 052785 7392 ACTIONSPROUT.COM 866-298-1739 WA	-44.00	42.41
12/12	Deposit by Check	944.63	987.04
12/12	Withdrawal Debit Card 12/11 046536 2741 THE NEAT COMPANY 866-3952135 PA	-15.81	971.23
12/13	Draft 000706	-50.00	921.23
12/16	Draft 000710	-100.00	821.23
12/16	Withdrawal Transfer To Share 71 TO SATISFY NEGATIVE BALANCE	-29.23	792.00
12/17	Withdrawal Transfer To Share 71 TO SATISFY NEGATIVE BALANCE	-39.17	752.83
12/17	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-600.00	152.83
12/17	Draft 000709	-50.00	102.83

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DIANE M RUSSELL 184 CONGRESS ST APT #2 PORTLAND ME 04101 ATTENTION MEMBERS WITH IRA ACCOUNTS: Your year-end IRA statement balance is being furnished to the Internal Revenue Service as your IRA fair market value.

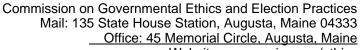
Our affordable Home Equity Line of Credit, may be just what YOU NEED! Call us at 800.750.0959 or Speak with a Credit Union Representative TODAY for more information. ~Happy New Year~

Posting ID # / Date Eff. Date	Transaction Description	on	Payment Credits or Debits	FINANCE	Fees or Charges	Transaction Amount	Balanc
	thdrawal Transfer		71			-14.93	87.9
2/31 Wi	thdrawal Checking Balance					-5.00	82.9 82.9
			Total F This Per	or T	otal Yea to-Date		
Total Return	ed Item Fees		0	.00	30.	00	
Total Overdr	aft Fees		0	.00	0.	00	

Number Amount Number Amount Number Amount Number Amount 000706 50.00 000709* 50.00 000710 100.00 * Asterisk next to number indicates skip in number sequence

Total Dividends Earned Year to Date

Acc	count Balance	ce Summary	
Total Shares PRIME SHARE CLASSIC CHECKING CAMPAIGN TO ELECT DIANE RUSSEL RUSSELL WORKING FAMILIES PAC	Balance 25.00 88.23 0.00 82.90	Total Lóans	Balance
a.nana	196.13	·	



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

Phone: 207-287-4179 Fax: 207-287-6775



2015 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER		
WORKING FAMILIES PAC		EIRANNE HART CHI	RISTY	
128R NORTH ST		468 WEBBS MILL RI		
PORTLAND, ME 04101		RAYMOND, ME 0407	71	
PHONE: (207) 272-9182		PHONE: (207) 478-1268		
EMAIL: DIANERUSSELL207@GMAIL.COM		EMAIL: EIRANNE.HART@YAHOO.COM		
REPORT	DUE	DATE	REPORTING PERIOD	
APRIL QUARTERLY REPORT	04/10	/2015	01/01/2015 - 03/31/2015	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$175.00	\$175.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$175.00	\$175.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$9.91	\$9.91
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$9.91	\$9.91
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$8,901.50	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$175.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$9.91	
12. CASH BALANCE AT END OF PERIOD	\$9,066.59	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$5,500.00	

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

REPORT FILED BY: EIRANNE HART CHRISTY REPORT FILED ON: 04/10/2015 LAST MODIFIED: 10/20/2015 PRINTED: 06/30/2018 COMMITTEE ID: 6537

SCHEDULE A CASH CONTRIBUTIONS

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

Contributor Types

1 = Individual 9 = Candidate / Candidate Committee

2 = Candidate/ Spouse/ Domestic Partner 10 = General Treasury Transfer

3 = Commercial Source11 = Transfer from Previous Campaign4 = Nonprofit Organization12 = Contributors giving \$50 or less5 = Political Action Committee13 = Contributors giving \$100 or less6 = Political Party Committee14 = Contributors giving \$200 or less

7 = Ballot Question Committee 15 = MCEA Payment 8 = Other Candidate/ Candidate Committee 16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	TYPE	AMOUNT		
1/17/2015	KATHRYN GOLDIZEN 22 BELTRAN ST MALDEN, MA 02148	TUFTS MEDICAL CENTER DESCRIPTION: RN	1	\$50.00		
2/16/2015	KATHRYN GOLDIZEN 22 BELTRAN ST MALDEN, MA 02148	TUFTS MEDICAL CENTER DESCRIPTION: RN	1	\$50.00		
3/22/2015	CONTRIBUTORS GIVING \$50 OR LESS		12	\$75.00		
	TOTAL CASH CONTRIBUTIONS					

SCHEDULE B-1 OPERATING EXPENDITURES

	EXPENDITURES TYPES						
CNS	Campaign consultants	POL	Polling and survey research				
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees				
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other 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	Print 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				
ОТН	Other	WEB	Website design, registration, hosting, maintenance, etc.				
PHO	Phone banks, automated telephone calls						

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
3/31/2015	ACT BLUE 366 SUMMER STREET SOMERVILLE, MA 02144	TRANSACTION FEE FOR THE QUARTER, BROKEN DOWN AS FOLLOWS: 3/29: .60 3/22: 2.97 2/22: 2.97 2/1:.40 1/18: 2.97	ОТН	\$9.91
	ITURES	\$9.91		

SCHEDULE D UNPAID DEBTS AND OBLIGATIONS

- A debt or obligation is incurred if a committee places an order for a good or service without making a payment; makes a promise or agreement to pay for a good or service; signs a contract for a good or service; or receives delivery of a good or service for which the committee has not paid.
- This schedule is a list of all debts and obligations of the committee as of the end of this reporting period.

DATE OF OBLIGATION	CREDITOR	DESCRIPTION	AMOUNT
7/15/2013	PowerThru LLC 1740 Hinesburg Road Richmond, ME 05477	FUNDRAISING	\$4,500.00
2/1/2014	GG DIRECT 351 RIVERSIDE INDUSTRIAL PARKWAY PORTLAND, ME 04103		\$1,000.00
		TOTAL UNPAID DEBTS AND OBLIGATIONS	\$5,500.00

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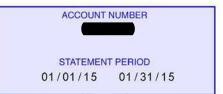


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DIANE M RUSSELL 28 SAINT LAWRENCE ST APT #2 PORTLAND ME 04101 -Join Us For Our 58th Annual Meeting February 25th, 5PM at our Bath Office.
-Invest Today for a Better Tomorrow, contribute to an IRA TODAY and Save!
-Five County's Milestones, a unique gift registry account and personalized online member event page. Visit fivecounty.com.
-Our affordable Home Equity Line of Credit, may be just what YOU NEED!
Call us at 800.750.0959 or stop by!

Posting Date	ID # / Eff. Date	Transaction Description	Payment Credits FINANCE or Debits CHARGE	Fees or Charges	Transaction Amount	Balance
Divide	da Farna	New Balance d Year to Date 0.00				
		d Year to Date 0.00 d In 2014 0.00				
01/01	ID 72	CAMPAIGN TO ELECT DIANE RU New Balance	SSEL Previous Balance			0.00
Divider		d Year to Date 0.00 d In 2014 0.00				0.00
01/01	ID 73	RUSSELL WORKING FAMILIES F	AC Previous Balance		4 04	1568.77
01/01		Withdrawal Debit Card 12/31 040134 5812 HILLTOP	COFFEE PORTLAND ME		-4.21	1564.56
01/04		Withdrawal Debit Card 01/03 041841 5542 0XFORD I	RVING OXFORD ME		-14.69	1549.87
01/05		Recurring Withdrawal Debit 01/05 099591 5968 NY TIMES	Card	7 NY	-36.29	1513.58
01/05		Withdrawal CyberBranch Tra - Mobile Banking	nsfer To Share 71		-1300.00	213.58
01/06		Withdrawal POS #923835	AVE DODELAND ME		-20.00	193.58
01/12		POS 7-ELEVEN 27 WASHINGTON Withdrawal POS #948136 POS VESTA VIRGIN M 11950 S			-61.15	132.43
01/13		PORTLAND OR Withdrawal POS #989818			-19.96	112.47
01/14		POS 7-ELEVEN 27 WASHINGTON Withdrawal at ATM #006193			-20.00	92.47
01/15		ATM FIVE COUNTY 223 US ROU Withdrawal Debit Card			-15.26	77.21
01/18		01/14 061795 5542 FALMOUTH Recurring Withdrawal Debit	IRVING FALMOUTH ME Card		-5.00	72.21
01/20		01/17 015886 4121 UBER 866 Withdrawal Debit Card	-576-1039 CA		-26.23	45.98
01/21		01/19 053541 5542 7-ELEVEN	32532 PORTLAND ME			42.83
		Withdrawal Debit Card 01/21 071411 5812 SQ *CROS	S CAFE Augusta ME		-3.15	
01/22		Withdrawal POS #732849 POS OREILLY AUTO PAR 61 WE	STERN AVE US		-6.54	36.29
01/22		AUGUSTA ME Withdrawal Debit Card			-4.21	32.08
01/23		01/21 040142 5812 HILLTOP Recurring Withdrawal Debit	COFFEE PORTLAND ME		-6.78	25.30
01/26		01/23 023528 4121 UBER TEC Recurring Withdrawal Debit	HNOLOGIES INC 866-576-1	039 CA	-13.07	12.23
01/27		01/26 095752 4121 UBER TEC Recurring Withdrawal Debit	HNOLOGIES INC 866-576-1	039 CA	-9.64	2.59
		01/27 011137 4121 UBER TEC	HNOLOGIES INC 866-576-1	039 CA		
01/27		Recurring Withdrawal Debit 01/27 064664 4121 UBER TEC	HNOLOGIES INC 866-576-1	039 CA		-10.05
01/27		Withdrawal Overdrawn at AT	М		-30.00	-40.05









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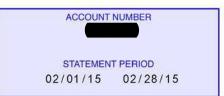
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-Our affordable Home Equity Line of Credit, may be just what YOU NEED!
Call us at 800.750.0959 or stop by!

Posting ID # / Date Eff. Date	Transaction Description	on	Payment Credi or Debits	its FINANCI CHARGI		Transaction Amount	Balanc
	eposit CyberBranch Mobile Banking		From Share	71		50.00	9.98
01 / 31 W 01 / 31 No Dividends Earned O Dividends Earned O		0.00 0.00				-5.00	4.9
			Total This Pe	For	Total Year to-Date	-	
Total Retur	ned Item Fees			0.00	0.0	00	
Total Overd	raft Fees		3	0.00	30.0	00	

Total Dividends Earned Year to Date

Acc	count Balance Summary	
Total Shares PRIME SHARE CLASSIC CHECKING CAMPAIGN TO ELECT DIANE RUSSEL RUSSELL WORKING FAMILIES PAC	Balance Total Lóans 25.00 559.44 0.00 4.95	Balance
	589.39	

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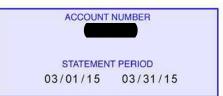
DIANE M RUSSELL 28 SAINT LAWRENCE ST APT #2 PORTLAND ME 04101

-Invest Today for a Better Tomorrow, contribute to an IRA TODAY and Save! -Our affordable Home Equity Line of Credit, may be just what YOU NEED! Call us at 800.750.0959 or stop by! -Five County's Milestones, a unique gift registry account and personalized online member event page. Visit fivecounty.com. Ask us about our FREE Visa Balance Xfr and how YOU deserve to SAVE MONEY!

Posting ID # / Date Eff. Date	Transaction Descript	ion	Payment Credit or Debits	S FINANCE CHARGE	Fees or Charges	Transaction Amount	Balanc
		1810 Pale Indian					
	1						
		3					
			I Into Per	or To	to-Date	8	
Total Returne	d Item Fees		30	0.00	30.	00	
Total Overdra	ft Fees			0.00	0.	100 CO	
lumber			Number	Amount	. Numbe	r	Amount
			_				
2/28 New	PAIGN TO ELECT D Balance		. Previous I	Balance			0.0
Dividends Earned Year Dividends Earned In 2		0.00 0.00					
2/01 ID 73 RUS	SELL WORKING FAM	ILLIES PAC F	Previous Ba	lance			4.9
12/28 New	hdrawal Checking Balance	41 - 4-00 (1994)				-5.00	-0.0 -0.0
Dividends Earned Year Dividends Earned In 2	ar to Date 2014	0.00 0.00					
			I Total F	or To	otal Yea	r-	
			This Per	^iod 	to-Date		
Total Returne	d Item Fees			0.00	0.	00	
Total Overdra	ft Fees		(0.00	30.	00	
Tot	al Dividends Ear	ned Year to	Date			0.00	
7.12 - 63	Ac	count_Balar	nce_Summary				12.12
otal Shares RIME SHARE ASSIC CHECKING MPAIGN TO ELEC		Balance 25.00 514.68 0.00	Total Loa	ans			Balanc

-0.05 539.63









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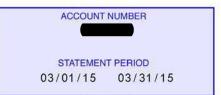
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Posting ID # / Date Eff. Date Transaction Description	Payment Credits FINANCE or Debits CHARGE		ansaction Amount	Balance
Total Returned Item Fees Total Overdraft Fees	This Period	otal Year- to-Date 30.00 60.00		
Number Amount Number Amount 001038 650.00	Number Amount	t Number		Amount
03/01 ID 72 CAMPAIGN TO ELECT DIANE RUSSEL 03/31 New Balance Dividends Earned Year to Date Dividends Earned In 2014 0.00	. Previous Balance			0.00
03/01 ID 73 RUSSELL WORKING FAMILIES PACE				-0.05
03/03 Deposit Transfer From Share 71 03/03 Deposit by Check 03/07 Recurring Withdrawal Debit Car	ď	2°	0.05 81.63 14.74	0.00 81.63 66.89
03/06 019345 4816 MSFT *OFFICE 03/07 Withdrawal Debit Card 03/07 020117 5542 7-ELEVEN 325	: 800-642-7676 WA	3	32.53	34.36
03/09 Withdrawal Debit Card			-5.82	28.54
03/07 040152 5812 HILLTOP COFF 03/25 Deposit by Check 03/27 Withdrawal Debit Card		39	110.44	138.98 108.60
03/26 050863 5812 ORCHID THAI 03/27 Withdrawal Debit Card		ME	-2.16	106.44
03/26 040143 5812 HILLTOP COFF 03/28 Withdrawal POS #931511		8	95.40	11.04
POS #07544 SHAW'S SOUTH PORTLA 03/28 Recurring Withdrawal Debit Car	d.		-7.37	3.67
03/28 000740 4816 MSFT *OFFICE 03/31 Withdrawal Checking Fee 03/31 New Balance Dividends Earned Year to Date 0.00 Dividends Earned In 2014 0.00	: 800-642-7676 WA		-5.00	-1.33 -1.33
Dividends Earned In 2014 0.00			21	
	I Total For I To	otal Year- to-Date		
Total Returned Item Fees	0.00	0.00		
Total Overdraft Fees	0 00 1	30.00		
			V	

Total Dividends Earned Year to Date

Total	Shares
PRIME	SHARE
CLASS	C CHECKING





Page 7



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Posting ID # / Date Eff. Date Tra	ansaction Description		ment Credits or Debits	FINANCE	Fees or Charges	Transaction Amount	Balance
Total Shares CAMPAIGN TO ELECT DI RUSSELL WORKING FAMI	ANE RUSSEL	ance To 0.00 1.33	otal Loa	ns			Balance
	-2	4.08					

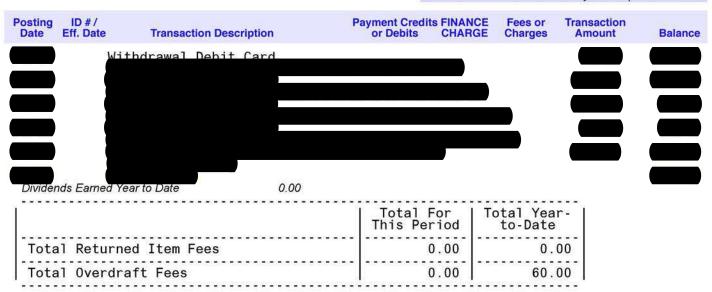


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DIANE M RUSSELL 128 R NORTH ST. PORTLAND ME 04101 The Holiday SKIP A PAY Season is back! Skip your eligible Dec or Jan loan pmt, or skip your Five County VISA payment. *Some exclusions may apply. Call Us. OPEN A CHRISTMAS CLUB TODAY! Or increase your current club amount & make your next Holiday Season a whole lot jollier! -NEED CASH? USE YOUR HOME! Learn about our HELOC promo @ MaineLendingExpert.com -Ask us about our Holiday Loan promotion



11/01 ID		20 AST 25 AST	3503.24
11/03	Withdrawal POS #277263 POS CIRCLE K 07020 545 MAIN ST US BANGOR ME	-43.11	3460.13
11/03	Withdrawal Debit Card 11/02 063266 5542 FALMOUTH IRVING FALMOUTH ME	-28.42	3431.71
11/03	Withdrawal POS #297636 POS DYSART'S TRAVEL STOP BANGOR ME	-11.88	3419.83
11/05	Withdrawal Debit Card 11/03 006486 5542 DYSARTS TRUCK STOP BANGOR ME	-25.00	3394.83
11/06	Withdrawal POS #067278 POS SHELL Service Station AUGUSTA ME	-24.52	3370.31
11/09	Withdrawal CyberBranch Transfer To RUSSELL DIANE M XXXXXXXXXX Share 71	-700.00	2670.31
11/11	Withdrawal CyberBranch Transfer To Share 71 Reimbursement for LV Hotel	-223.00	2447.31
11/12	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-250.00	2197.31
11/12	Withdrawal Debiť Card 11/11 062582 5814 ARABICA COFFEE - COMM PORTLAND ME	-19.46	2177.85
11/12	Withdrawal Debit Card 11/11 050770 7523 ONE CITY CENTER ASSOC PORTLAND ME	-6.00	2171.85
11/13	Withdrawal Debit Card 11/12 034114 4722 TRAVELOCITY.COM WWW.TVLY.COM WA	-155.26	2016.59
11/13	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-200.00	1816.59
11/14	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-100.00	1716.59
11/14	Withdrawal CyberBranch Transfer To Share /1 - Mobile Banking	-100.00	1616.59
11/17	Withdrawal CyberBranch Transfer To Share 71 - Mobile Banking	-100.00	1516.59
11/17	Withdrawal CyberBranch Transfer To Share 71	-200.00	1316.59

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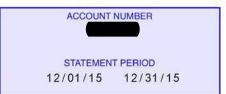
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Posting Date	ID # / Eff. Date	Transaction Description	P	ayment Credit or Debits	S FINANCE CHARGE		Transaction Amount	Balanc
44/47	-	Mobile Banking	T	T- Ch	74		400.00	4046 5
11/17		thdrawal CyberBranch Mobile Banking	Transfer	io Snare	11		-100.00	1216.5
11/18	Wi	thdrawal CyberBranch	Transfer	To Share	71		-50.00	1166.59
11/18	1.14	Mobile Banking	Transfer	To Chana	71		50.00	1116.5
11/19	Wi	thdrawal CyberBranch thdrawal Debit Card	Transfer	10 Share	11		-50.00 -25.00	1091.5
	11	/18 079242 8651 EMER						
11/27		posit CyberBranch Tra	ansfer Fro	om Share 7	71		160.00	1251.5
11/27	Wi	Mobile Banking thdrawal CyberBranch	Transfer	To Share	72		-160.00	1091.59
	=	Mobile Banƙing						
11/27	Wi	thdrawal CyberBranch Mobile Banking	Transfer	To Share	72		-200.00	891.5
11/30	Wi	thdrawal CyberBranch	Transfer	To Share	72		-200.00	691.5
		Mobile Banƙing						
11/30 11/30		thdrawal Checking Fee w Balance	9				-5.00	686.59
Dividen	ds Earned Ye	ear to Date 0.	00					000.3
				Total F	For I 7	otal Yea	 n l	
				This Per		to-Date		
lota	Return	ed Item Fees		(0.00	0.	00	
Tota	1 Overdra	aft Fees		(0.00	30.	00	

Total Dividends Earned Year to Date

Acc	count Balan	ce Summarv	
Total Shares PRIME SHARE CLASSIC CHECKING CAMPAIGN TO ELECT DIANE RUSSEL RUSSELL WORKING FAMILIES PAC	Balance 25.00 4.27 248.47 686.59	Total Lóans	Balance
	964.33		

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Page 7



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DIANE M RUSSELL 128 R NORTH ST. PORTLAND ME 04101 ATTENTION MEMBERS WITH IRA ACCOUNTS:
Your year-end IRA statement balance is being furnished to the Internal Revenue Service as your IRA fair market value.

Join Us For Our 59th Annual Meeting - Wednesday, February 17th at 5PM - Bath Office located at 765 Washington Street.

'TIS THE SEASON TO SKIP-A-PAY. Call FMI. -Have a Healthy & Happy New Year-

osting ID	#/			19	Payment Cre	dits FINANC	E Fees or	Trans	saction	
Date Eff.	Date	Transaction Desc	ription		or Debits	CHARG	E Charges	Am	ount	Balan
					2-7-3	:				
					Total	For	Total Yea	ar-		
T-4-1 D		J 74 F								
Total R	eturne	ed Item Fees				0.00		. 00		
Total 0	verdra	ift Fees				0.00	60	00		
0/04 TD	72 DU	SELL MODERNO	- AMTITI	EC DAC D.	-	-1				606 4
2/01 10	Wit	SELL WORKING P hdrawal Cyber						- 100	0.00	686 . 5
2/08	Wit	lobile Banking hdrawal Cyber	Branch	Transfer	To Shar	e 71		- 100	0.00	486.5
2/08	- M	lobile Banking oosit by Check						8	7.38	573.9
2/12	Wit	hdrawal Cyber lobile Banking	Branch	Transfer	To Shar	e 71			0.00	473.9
2/12	Wit	hdrawal Cyber	Branch	Transfer	To Shar	e 71		- 100	0.00	373.9
2/13	Wit	lobile Banƙing hdrawal Cyber	Branch	Transfer	To Shar	e 71		- 100	0.00	273.9
2/23	Wit	lobile Banking hdrawal Cyberi	Branch	Transfer	To Shar	e 72		- 100	0.00	173.9
2/26	- M	lobile Banking :hdrawal CvberE						- 100	0.00	73.9
2/31	- M	lobile Banking hdrawal Check	ina Fe	e.				-!	5.00	68.9
2/31 Dividends F	Nev	i Balance ar to Date	g . σ.	00				5500		68.9
		ar to Date								
							Total Yea	ar-		
Total R	eturne	ed Item Fees				0.00	0	00		
		ift Fees				0.00				

Total Dividends Earned Year to Date

Ac	count Balane	ce Summary	
Total Shares PRIME SHARE CLASSIC CHECKING CAMPAIGN TO ELECT DIANE RUSSEL RUSSELL WORKING FAMILIES PAC	Balance 25.00 645.88 0.01 68.97	Total Lóans	Balance
	739.86		

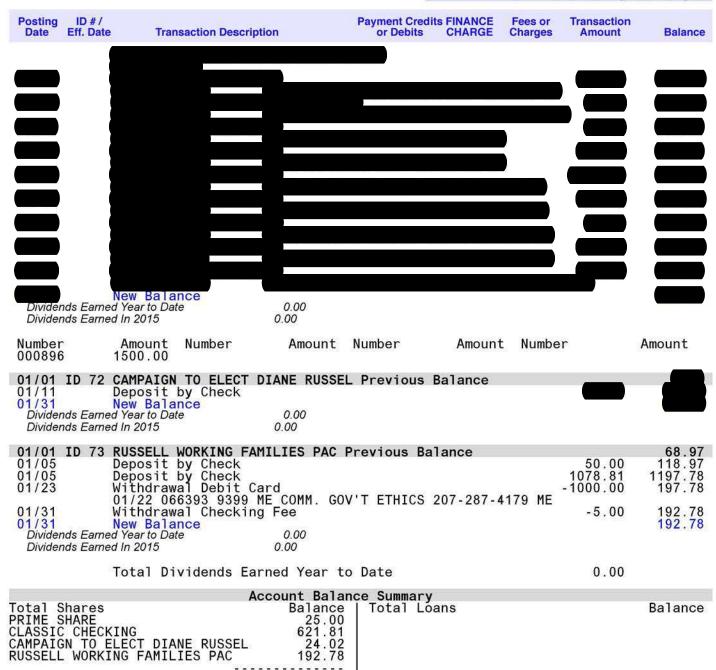
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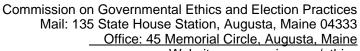
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Posting Date	ID # / Eff. Date	Transactio	n Description	Payment Credits or Debits	FINANCE	Fees or Charges	Transaction Amount	Balance
		New Balance If Year to Date If In 2015	0.00 0.00					0.05
02/01	ID 73	RUSSELL WORK	ING FAMILIES PAC	Previous Bal	ance			192.78
02/10 02/11		Deposit by C Withdrawal D 02/10 026195	ebit Card	OIL 91800986	DODTI AN	ID ME	24.00 -20.29	216.78 196.49
02/18		Withdrawal D 02/18 043293	ebit Card	IN MOBILE USA	at patronicements	inimo i initerna	-59.03	137.46
02/23 02/25		Withdrawal D			MOUTH M	-0 10 10 10 10 10 10 10 10 10 10 10 10 10	-60.00 -18.98	77.46 58.48
02/25 02/26		02/24 031757 Deposit by C Withdrawal D	heck ebit Card	LES 00110 FAL			1821.80 -21.23	1880.28 1859.05
02/29	j)	02/25 066599 Withdrawal C New Balance	hecking Fee	LE K 07084 FR	EEPORI I	1E	-5.00	1854.05 1854.05
0.1000.000.000	ids Earned ids Earned	d Year to Date d In 2015	0.00 0.00					

Ac	count Balance Summary	
Total Shares PRIME SHARE CLASSIC CHECKING CAMPAIGN TO ELECT DIANE RUSSEL RUSSELL WORKING FAMILIES PAC	Balance Total Lóans 25.00 344.64 0.05 1854.05	Balance
ST. T. ST.	2223.74	

Total Dividends Earned Year to Date



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

Fax: 207-287-4179



2017 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER		
WORKING FAMILIES PAC		MRS. EIRANNE CHRISTY		
128R NORTH ST		468 WEBBS MILL RD		
PORTLAND, ME 04101		RAYMOND, ME 04071		
PHONE: (207) 272-9182		PHONE: (207) 478-1268		
EMAIL: DIANERUSSELL207@GMAIL.CO	М	EMAIL: EIRANNE.HA	ART@YAHOO.COM	
REPORT	DUE	DATE	REPORTING PERIOD	
JANUARY QUARTERLY REPORT	01/16/2018		10/01/2017 - 12/31/2017	

FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$15.00	\$3,991.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$15.00	\$3,991.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$15.60	\$1,075.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$15.60	\$1,075.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$13,339.94	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$15.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$15.60	
12. CASH BALANCE AT END OF PERIOD	\$13,339.34	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$0.00	\$0.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$5,500.00	

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

REPORT FILED BY: MRS. EIRANNE CHRISTY REPORT FILED ON: 01/16/2018 LAST MODIFIED: 01/16/2018 PRINTED: 07/01/2018 COMMITTEE ID: 6537

SCHEDULE A CASH CONTRIBUTIONS

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

Contributor Types

6 = Political Party Committee

1 = Individual9 = Candidate / Candidate Committee2 = Candidate/ Spouse/ Domestic Partner10 = General Treasury Transfer3 = Commercial Source11 = Transfer from Previous Campaign4 = Nonprofit Organization12 = Contributors giving \$50 or less5 = Political Action Committee13 = Contributors giving \$100 or less

7 = Ballot Question Committee 15 = MCEA Payment

8 = Other Candidate/ Candidate Committee 16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	TYPE	AMOUNT
12/31/2017	CONTRIBUTORS GIVING \$50 OR LESS		12	\$15.00
	\$15.00			

14 = Contributors giving \$200 or less

SCHEDULE B-1 OPERATING EXPENDITURES

	EXPENDITURES TYPES							
CNS	Campaign consultants	POL	Polling and survey research					
CON	Contribution to other candidate, party, committee	POS	Postage for U.S. Mail and mail box fees					
EQP	Equipment (office machines, furniture, cell phones, etc.)	PRO	Other 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	Print 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					
ОТН	Other	WEB	Website design, registration, hosting, maintenance, etc.					
PHO	Phone banks, automated telephone calls							

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/29/2017	ACT BLUE 366 SUMMER STREET SOMERVILLE, MA 02144	PROCESSING FEE.	CNS	\$0.20
10/30/2017	Five County Credit Union PO Box 598 Bath, ME 04530	BANK FEE.	ОТН	\$5.00
11/26/2017	ACT BLUE 366 SUMMER STREET SOMERVILLE, MA 02144	PROCESSING FEE.	CNS	\$0.20
11/30/2017	Five County Credit Union PO Box 598 Bath, ME 04530	BANK FEE.	ОТН	\$5.00
12/24/2017	ACT BLUE 366 SUMMER STREET SOMERVILLE, MA 02144	PROCESSING FEE.	CNS	\$0.20
12/31/2017	Five County Credit Union PO Box 598 Bath, ME 04530	BANK FEE.	ОТН	\$5.00
	ITURES	\$15.60		

SCHEDULE D UNPAID DEBTS AND OBLIGATIONS

- A debt or obligation is incurred if a committee places an order for a good or service without making a payment; makes a promise or agreement to pay for a good or service; signs a contract for a good or service; or receives delivery of a good or service for which the committee has not paid.
- This schedule is a list of all debts and obligations of the committee as of the end of this reporting period.

DATE OF OBLIGATION	CREDITOR	DESCRIPTION	AMOUNT
7/15/2013	PowerThru LLC 1740 Hinesburg Road Richmond, ME 05477	FUNDRAISING	\$4,500.00
2/1/2014	GG DIRECT 351 RIVERSIDE INDUSTRIAL PARKWAY PORTLAND, ME 04103		\$1,000.00
		TOTAL UNPAID DEBTS AND OBLIGATIONS	\$5,500.00

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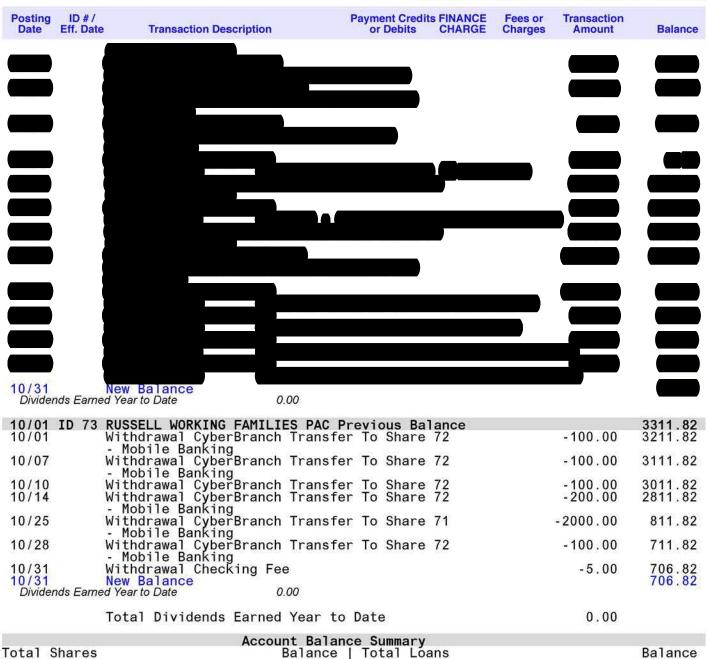






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Total Shares PRIME SHARE CLASSIC CHECKING Balance 25.00 -27.06 CAMPAIGN TO ELECT DIANE RUSSEL -2.22

Balance









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Posting Date	ID # / Eff. Date	Transaction Description	V (Payment Credi or Debits	ts FINANCE CHARGE	Fees or Charges	Transaction Amount	Balance
Total S RUSSELL	Shares WORKING	FAMILIES PAC	Balance 706.82	Total Lo	ans			Balance
			702.54					

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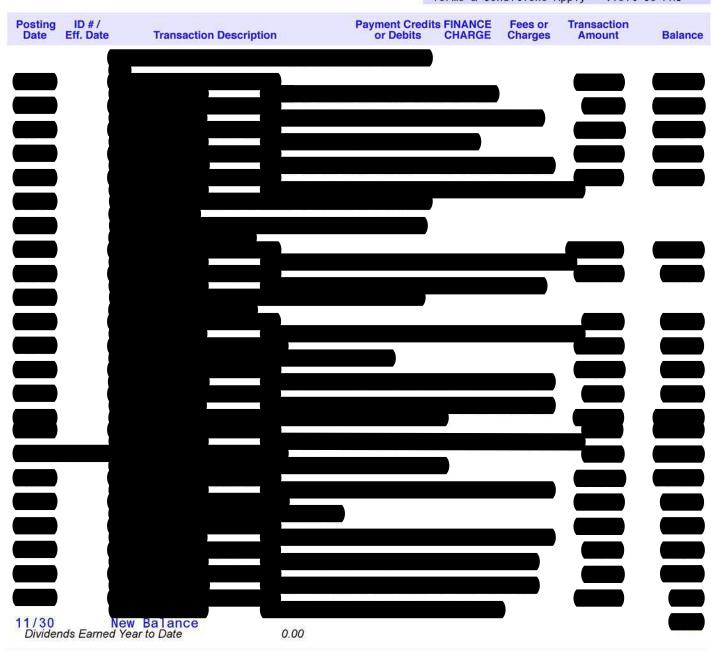






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Posting Date	ID # / Eff. Date	Transac	tion Description	ı	Payment Credit or Debits	S FINANCE CHARGE	Fees or Charges	Transaction Amount	Balance
11/03 11/03		thdrawal thdrawal	CyberBranch CyberBranch	Transfer Transfer	To Share To Share	72 72		-200.00 -250.00	411.62 161.62
11/18 11/30 11/30 Dividen	Wi	thdrawal thdrawal w Balance		Transfer e .00	To Share	72		-150.00 -5.00	11.62 6.62 6.62
	To	tal Divi	dends Earned	Year to	Date			0.00	
			Accou	nt Balanc	e Summary				
	HARE CHECKINGN TO ELE		RUSSEL	Balance 25.00 2.94 4.03 6.62	Total Loa	ans			Balance

6.62 38.59

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Your year-end IRA statement balance is being furnished to the Internal Revenue Service as your IRA fair market value.

-Invest today for a better tomorrow -

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Posting ID # / Date Eff. Date Transaction Descri	iption	Payment Credits or Debits	FINANCE	Fees or Charges	Transaction Amount	Balance
New Balance Dividends Earned Year to Date	0.00	x				
12/01 ID 73 RUSSELL WORKING FA					-6.00	6.62 0.62
12/31 Withdrawal Checking 12/31 New Balance Dividends Earned Year to Date	12/31 New Balance					
Total Dividends Ea	arned Year t	o Date			0.00	
	Account Bala	nce Summary				
Total Shares PRIME SHARE CLASSIC CHECKING CAMPAIGN TO ELECT DIANE RUSSEL RUSSELL WORKING FAMILIES PAC	Balance 25.00 2.94	Total Loa	ns			Balance
tanderstandings with the subdestilestands of 1200 GUV. C.D. Wo. 12. Allestands	25.91					

Title 21-A Maine Revised Statutes (2017 Version)

§ 1060. Content of reports

The reports must contain the following information and any additional information required by the commission to monitor the activities of political action committees:

- **1. Identification of candidates.** The names of and offices sought by all candidates whom the committee supports, intends to support or seeks to defeat;
- **2. Identification of committees; parties.** The names of all political committees or party committees supported in any way by the committee;
- **3. Identification of referendum or initiated petition.** The referenda or initiated petitions that the committee supports or opposes;
- 4. Itemized expenditures. An itemization of each expenditure made to initiate or influence any campaign, including the date, payee and purpose of the expenditure; the name of each candidate, campaign, political committee, political action committee or party committee supported or opposed; and each referendum or initiated petition supported or opposed by the expenditure. If expenditures were made to a person described in section 1012, subsection 3, paragraph A, subparagraph (4), the report must contain the name of the person; the amount spent by that person on behalf of the candidate, campaign, political committee, political action committee, party committee, referendum or initiated petition, including, but not limited to, expenditures made during the signature gathering phase; the reason for the expenditure; and the date of the expenditure. The commission may specify the categories of expenditures that are to be reported to enable the commission to closely monitor the activities of political action committees;
- **5. Aggregate expenditures.** An aggregation of expenditures and cumulative aggregation of expenditures to a candidate, campaign, political committee, political action committee, party committee, referendum or initiated petition;
- **6. Identification of contributions.** Names, occupations, places of business and mailing addresses of contributors who have given more than \$ 50 to the political action committee in the reporting period and the amount and date of each contribution, except that an organization qualifying as a political action committee under section 1052, subsection 5, paragraph A, subparagraph (5) is required to report only those contributions made to the organization for the purpose of influencing a ballot question or the nomination or election of a candidate to political office and all transfers to or funds used to support the political action committee from the general treasury of the organization; and
- 7. Other expenditures.

Operational expenses and other expenditures that are not made on behalf of a candidate, committee or campaign, except that an organization qualifying as a political action committee under section 1052, subsection 5, paragraph A, subparagraph (5) is required to report only those expenditures made for the purpose of influencing a campaign.

§ 1062-A. Failure to file on time

- 1. Registration. A political action committee required to register under section 1052-A or 1053-B or a ballot question committee required to register under section 1056-B that fails to do so or that fails to provide the information required by the commission for registration may be assessed a fine of no more than \$ 2,500. In assessing a fine, the commission shall consider, among other things, whether the violation was intentional, the amount of campaign and financial activity that occurred before the committee registered, whether the committee intended to conceal its campaign or financial activity and the level of experience of the committee's volunteers and staff.
- 2. Campaign finance reports. A campaign finance report is not timely filed unless a properly signed or electronically submitted copy of the report, substantially conforming to the disclosure requirements of this subchapter, is received by the commission by 11:59 p.m. on the date it is due. Except as provided in subsection 6, the commission shall determine whether a required report satisfies the requirements for timely filing. The commission may waive a penalty in whole or in part if it is disproportionate to the level of experience of the person filing the report or to 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 of the committee treasurer 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; or
 - **C.** 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.
- **3. 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%.

Any penalty of less than \$ 10 is waived.

Violations accumulate on reports with filing deadlines in a 2-year period that begins on January 1st of each even-numbered calendar year. Waiver of a penalty does not nullify the finding of a violation.

A report required to be filed under this subchapter that is sent by certified or registered United States mail and postmarked at least 2 days before the deadline is not subject to penalty.

A required report may be provisionally filed by transmission of a facsimile copy of the duly executed report to the commission, as long as an original of the same report is received by the commission within 5 calendar days thereafter.

- **4. Maximum penalties.** The maximum penalty under this subchapter is \$ 10,000 for reports required under section 1056-B or section 1059, except that if the financial activity reported late exceeds \$ 50,000, the maximum penalty is 100% of the amount reported late.
- 5. Request for a commission determination. If the commission staff finds that a political action committee has failed to file a report required under this subchapter, the commission staff shall mail a notice to the treasurer of the political action committee within 3 business days following the filing deadline informing the treasurer that a report was not received. If a political action committee files a report required under this subchapter late, a notice of preliminary penalty must be forwarded to the treasurer of the political action committee whose report is not received by 11:59 p.m. on the deadline date, informing the treasurer of the commission staff finding of violation and preliminary penalty calculated under subsection 3 and providing the treasurer with an opportunity to request a determination by the commission. A request for determination must be made within 14 calendar days of receipt of the commission's notice. A principal officer or treasurer requesting a determination may either appear in person or designate a representative to appear on the principal officer's or treasurer's behalf or submit a sworn statement explaining the mitigating circumstances for consideration by the commission. A final determination by the commission may be appealed to the Superior Court in accordance with Title 5, chapter 375, subchapter 7 and the Maine Rules of Civil Procedure, Rule 80C.
- **6. Final notice of penalty.** After a commission meeting, notice of the final determination of the commission and the penalty, if any, imposed pursuant to this subchapter must be sent to the principal officer and the treasurer of the political action committee.

If a determination is not requested, the preliminary penalty calculated by the commission staff is final. The commission staff shall mail final notice of the penalty to the principal officer and to the treasurer of the political action committee. A detailed summary of all notices must be provided to the commission.

7. List of late-filing committees. The commission shall prepare a list of the names of political action committees that are late in filing a report required under section 1059, subsection 2, paragraph B, subparagraph (1) or section 1059, subsection 2, paragraph C or D within 30 days of the date of the election and shall make that list available for public inspection.

- **8. Failure to file.** A person who fails to file a report as required by this subchapter within 30 days of the filing deadline is guilty of a Class E crime, except that, if a penalty pursuant to subsection 8-A is assessed and collected by the commission, the State may not prosecute a violation under this subsection.
- **8-A.** Penalties for failure to file report. The commission may assess a civil penalty for failure to file a report required by this subchapter. The maximum penalty for failure to file a report required under section 1056-B or section 1059 is \$ 10,000 or the amount of financial activity not reported, whichever is greater.
- **9. Enforcement.** A penalty assessed pursuant to this section that has not been paid in full within 30 days after issuance of a notice of the final determination may be enforced in accordance with section 1004-B.