



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

To: Commission
From: Commission Staff
Date: October 25, 2022
Re: American Leadership Committee-Maine PAC

The Commission received a complaint from Ms. Mary Small concerning mailings sent by the American Leadership Committee-Maine PAC (the “PAC”) to oppose Republican legislative candidates. Ms. Small states that the mailings do not identify the top three funders of the PAC, which is required for most independent expenditure (IE) communications in Maine. The sample mailing she provided (opposing House candidate Linda Baker) contains the message: “No top donors.” The cost of the Baker mailing was included in an IE report filed by the PAC on October 14, 2022, which included the costs of mailings opposing ten legislative candidates totaling \$18,146. Yesterday, the Commission received a second complaint about the top 3 funder issue from Kim Pettengill (attached) and we received informal concerns from two others by email.

The PAC responded to the complaint yesterday through a letter from its counsel, the Elias Law Group. The letter is attached for your consideration, but the staff has truncated exhibit A from 280 pages to five pages. In summary, the PAC responds as follows. It is fully funded by the Democratic Leadership Campaign Committee (“DLCC”), which is a national organization dedicated to electing Democratic candidates to state office. The DLCC typically makes contributions or expenditures in more than 20 states each election cycle. To comply with the donor disclosure laws in the different states, it has set up a protocol for tracking or attributing funds it has received to specific expenditures in each jurisdiction. For purposes of disclosing donors who have funded IEs in Maine this election, the DLCC has attributed this spending to donors whose contributions to the DLCC since the November 4, 2020 election were less than \$1,000. Because these individuals gave less than \$1,000 to the DLCC in that period, the PAC is not required to name them in the mailing.

Commission staff requested additional information relevant to whether the PAC had reported the correct expenditure date in the October 14, 2022 IE report.

Relevant Laws and Rule

Commission initiation of investigation

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

Preliminary investigation by staff. In addition, the Commission staff “may conduct such preliminary investigation as is deemed prudent and desirable” in the case of any inquiry or complaint filed with the Commission or if “any potential violation [] comes to the attention of Commission staff through an audit or review of reports.” 94-270 C.M.R. Ch. 1, § 5(1).

Top 3 Funder Disclosure Requirement

For decades, communications to voters in Maine advocating for or against candidates (mailings, ads, signs, *etc.*) have been required to include the name of the organization that paid for the communication. 21-A M.R.S. §§ 1014(1)&(2). In 2015, Maine joined other states in requiring that IE communications must state the “top 3 funders” of the organization that paid for the communication. 21-A M.R.S. § 1014(2-B). IEs are the costs of express advocacy communications to voters that were prepared without consultation or cooperation with the candidates in the affected races. 21-A M.R.S. § 1019-B.

The top 3 funder disclosure requirement was adopted as part of a 2015 citizen initiative promoted by election reform advocates to bolster campaign finance laws. 21-A M.R.S. § 1014(2-B). The purpose of the law is to provide members of the public with immediate information concerning the source(s) of funding for communications they have received.

Under this requirement, PACs, party committees and others engaging in IEs are required to include in the communications “the funders providing the highest dollar amount of funding to the entity making the independent expenditure since the day following the most recent general election day.” 21-A M.R.S. § 1014(2-B). Since general elections occur every two years,

practically speaking, this translates into a duty for an organization making an IE to disclose the three sources that provided the organization with the highest amounts of its funding during the previous 21-24 months.

The law specifies the language required for the disclosure statement: “The top 3 funders of (name of entity that made the IE) are (names of top 3 funders). 21-A M.R.S. § 1014(2-B). Funding sources that have given less than \$1,000 since the last general election do not need to be disclosed § 1014(2-B). The law also exempts from disclosure two categories of funds:

When compiling the list of top funders, an entity making an independent expenditure may disregard any funds that the entity can show were used for purposes unrelated to the candidate mentioned in the communication on the basis that funds were either spent in the order received or were strictly segregated in other accounts.

§ 1014(2-B)(E). This provision is discussed below in the staff analysis section of this memo.

Commission’s Rules - Top 3 Funder Requirement

In November 2015, the Commission began a rulemaking to interpret and implement the top 3 funding disclosure requirement that Maine voters adopted. One of the election reform groups responsible for the initiative urged the Commission to specifically address IEs by PACs in situations where application of the top 3 funder law might be ambiguous. In January 2016, the Commission adopted § 7(12) of the Commission’s Chapter 1 rules (attached), which included this paragraph:

D. If the communication is funded by a political action committee that is fully funded or controlled by another political action committee or legal entity, the top three funders to be listed are the top three funders of that entity that fully funds or controls the political action committee.

To illustrate the intent of this paragraph through a hypothetical, if the “Maine Justice PAC” is controlled and funded by a separate nonprofit entity “Americans for Justice,” the top 3 disclosure requirement should not be “The top funder of the Maine Justice PAC is Americans for Justice.” Rather, the paragraph was intended to require the disclosure of the top three funders of Americans for Justice that were ultimately responsible for funding the IE.

Definition of Expenditure

The term “expenditure” includes “a purchase, payment, distribution, loan, advance, deposit or gift of money anything of value made for the purpose of initiating or influencing a campaign,” and “a contract, promise, or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure for the purposes set forth in this paragraph.” 21-A M.R.S. §§ 1052(4)(A)(1)&(2). The Commission has adopted a rule (Chapter 1, § 7(3) confirming that placing an order for a good or service constitutes reportable expenditure, even if the order has not been paid for:

3. Reporting Debts and Unpaid Obligations

- A. The following events constitute expenditures, even if the payment for a good or service has not been made at the time of the event:
 - (1) The placement of an order for a good or service;
 - (2) The signing of a contract for a good or service;
 - (3) The acceptance of the delivery of a good or the performance of a service by a vendor; or
 - (4) A promise or an agreement (including an implied one) that a payment will be made in exchange for a good or service.
- B. For reporting purposes, the expenditures listed in paragraph A are designated as debts or obligations prior to payment for the goods or services being made.
- C. If a person required to file a campaign finance report has a debt or obligation which remains unpaid at the end of the report period, the person shall report the date, amount, vendor, and purpose of the debt or obligation. If the exact amount is not known, the person filing the report shall report an estimate of the amount (preferably obtained in a written statement from the vendor).
- D. If a debt or obligation occurs in the same report period as a payment for that debt or obligation, the person filing the report will report only the payment, not the debt or obligation.
- E. A candidate or committee is not required to report a payment for a good or service in a 24-Hour Report, if the candidate or committee reported a debt for that good or service in the last regularly scheduled campaign finance report.

94-270 C.M.R. ch. 1 § 7(3). In accordance with this rule, the Commission’s eFiling system is designed so that an independent spender may indicate that it is reporting an unpaid debt or obligation, rather than a payment.

Staff Analysis

The DLCC is a national organization, incorporated in Washington D.C., that is dedicated to electing Democratic candidates to state office. In the PAC’s October 24, 2022 response to the complaint, its counsel indicated that the DLCC typically promotes Democratic candidates in more than 20 states each election cycle. The Commission staff has had a brief opportunity to review the DLCC’s Form 8872 quarterly statements on file with the U.S. Internal Revenue Service (IRS). We calculate that the DLCC received \$21,463,515 in contributions during the first nine months of 2022. Judging by the third quarterly statement, most contributions received by the DLCC are from individuals in amounts of less than \$1,000 although the statement includes some donations from individuals in higher amounts and some contributions from organizations. It is clear from the statement that the DLCC has a capable bookkeeping operation.

The American Leadership Committee is also nonprofit corporation registered in Washington, D.C. In its last quarterly statement with the IRS, it reported receiving a total of \$1,443,715 from the DLCC this year (through September 30, 2022).

The American Leadership Committee registered its Maine PAC with the Commission on August 22, 2022. The PAC is fully funded by the DLCC. Its principal officer and treasurer are the chief operating officer and finance/compliance director of the DLCC, respectively. Since registering, the PAC has filed five IE reports disclosing a little less than \$350,000 on communications to oppose Republican candidates or support Democratic candidates in Maine:

Date	Amount	Expenditure Type
10/5/2022	\$149,000	Social media and online advertising
10/14/2022	\$18,146	Direct mail
10/19/2022	\$38,497	Direct mail
10/22/2022	\$125,000	Social media and online advertising
10/23/2022	\$17,885	Direct Mail

To the best of our knowledge, all the communications contain the same “No top donors” disclosure statement.

PAC's Response on Top Funder Issue

In its October 24, 2022 response, the PAC's counsel explains that the American Leadership Committee and the DLCC must comply with financial reporting and donor attribution requirements in states across the country. These state laws differ and are sometimes in conflict. The PAC argues that it attempted in good faith to comply with Maine's top 3 funder disclosure law and believes it has done so. The PAC asserts it is prepared to correct any reports or communications to comply with guidance from the Commission.

The PAC describes its procedures for complying with contribution disclosure requirements as follows:

To comply with reporting rules across multiple jurisdictions, the DLCC has adopted a protocol for tracking which donors' funds are used in each jurisdiction. Prior to, or within a reasonable time after, funds are spent in a state, the DLCC identifies the donors whose funds were used to make the applicable contribution or expenditure. Once marked as spent in a particular state, that donor's contribution is no longer eligible to be spent in any other state.

The PAC states that in advance of the 2022 elections, the DLCC decided to fund IE communications from a separate bank account for "small-dollar" contributions it has received from individuals (up to \$4,999.99), referred to as the Low Individual Account. The PAC further explains:

Moreover, the DLCC determined that it would attribute its contributions to ALC-ME only to donors whose contributions since November 4, 2022 were less than \$1,000 in the aggregate, provided that sufficient funds of that type remained in the Low Individual Account at the time of each contribution.

The PAC has submitted a declaration from its chief operating officer stating that, in order to finance independent expenditures in Maine, the DLCC made five transfers during October 3-21, 2022 from its Low Individual Account to the separate bank account established for the PAC.

In explaining its rationale for the "No top donors" disclosure statement, the PAC relies on § 1014(2-B)(D):

D. When compiling the list of top funders, an entity making an independent expenditure may disregard any funds that the entity can show were used for purposes unrelated to the candidate mentioned in the communication on the basis

that funds were either spent in the order received or were strictly segregated in other accounts.

The PAC argues that, for purposes of complying with the top 3 funder requirement, this rule permits the PAC to use a reasonable accounting method to attribute its IEs in Maine to specific donors that have contributed to the DLCC since the November 2020 general election.

The Commission staff questions whether this is a correct reading of the statute, both in terms of the law's intent and language. The top 3 funder disclosure requirement, enacted by Maine voters in 2015, was intended to require PACs, party committees and others to disclose their three *highest* funding sources since the last general election. In contrast, the PAC is proposing to attribute its roughly \$350,000 in IEs in Maine to some of its *smaller* donors who gave less than \$1,000 with the effect that no donors would be disclosed to the Maine public. This seems contrary to public disclosure goal that the 2015 initiative envisioned.

Subsection 1014(2-B)(D) is intended to allow PACs and others to exclude funding sources in two categories:

- (1) a funder whose donation was *deposited into a separate account* that was used for some purpose other than independent expenditures (*e.g.*, lobbying or education).
- (2) *based on the order in which it was received*, a funder's donation that can be shown to have been spent on other purposes. For example, for purposes of an IE made in October 2022, a PAC may be entitled to exclude a contribution received 1½ years earlier in January 2021 if it believes it can demonstrate that particular donation was spent in early 2021 on some other purpose.

The statute does not include language suggesting that these categories were examples and that other accounting methods would be permissible to exclude additional funders from public disclosure. We are concerned that allowing a PAC or party committee to use its own discretion to "attribute" an expenditure to this or that donor (no matter how large or small) could lead to circumvention of the intent of the law, which is the disclosure of the three highest funding sources since the last general election.

The Commission staff respects that complying with multiple states' campaign finance laws can be a challenge, but that is a burden that the DLCC has chosen to accept by advocating for candidates in more than 20 states. The duty for the DLCC is to comply with each state's distinctive disclosure requirements, regardless how it has attributed its contributions in other

states' reporting systems. In the DLCC's third quarter IRS statement (July 1 – September 30, 2022), it reported received money from multiple individuals who gave the DLCC a total of \$1,000, \$2,000, \$3,500, or \$4,000 during 2022. These donations were presumably deposited in the DLCC's Low Individual Account that was used to finance IEs in Maine. In the opinion of the Commission staff, the PAC has not presented a good reason why these donors should have been excluded from the top 3 funder disclosure requirement. We recognize that factual information and legal argument are being presented to you in a compressed time period, but we currently tend toward the view that the "No Top Donors" disclosure statement in the PAC's IE communications does not meet the requirements of 21-A M.R.S. § 1014(2-B).

Expenditure Date of Independent Expenditure Report

In the IE report that is the subject of Ms. Small's complaint, the PAC reported the date of October 12, 2022 for its expenditure of \$18,146 to Moxie Media of Seattle. The postage language on the mailings suggests that they were printed by a company physically located about 50 miles south of Boston. The PAC explains that:

- templates were sent to the printer on Wednesday, October 5, 2022,
- postage was invoiced on Saturday, October 8, 2022, and
- the mailings were deposited at the U.S. Postal Service facilities in Hampden or Portland on Thursday, October 13, 2022.

The PAC contends, however, that the correct expenditure date is Wednesday, October 12. According to the PAC, that is the date that it paid the postal invoice and made a promise to move forward with the mailing as printed.

The Commission staff recommends viewing this explanation critically. Through its counsel and accompanying declarations, the PAC explains that American Leadership Committee sometimes orders the design of literature that is not subsequently printed for reasons of budget, timing, or revenue fluctuations. The PAC and its vendor, however, have not cited a single supporting example in which the American Leadership Committee or the DLCC declined to send literature that had been previously *printed*. In the first nine months of 2022, the American Leadership Committee received substantial revenue from the DLCC (a little more than \$1.4 million) which hopefully would provide some financial stability in funding IEs. Since the PAC ordered literature to be printed on October 5 (or shortly afterward) and was given an invoice for

a specific postage amount on October 8, these actions may be sufficient to conclude that the PAC had entered into an express or implied agreement during October 5-8 to pay for mailings, which would have required the PAC to file an IE report sometime in the range of October 7-10.

The Commission staff recognizes this timing issue was not part of Mary Small's original complaint. It is within the Commission's discretion whether to invest further resources on this timeliness issue. Thank you for your consideration of this memo.

October 24, 2022

Maine Commission on Governmental Ethics and Election Practices
135 State House Station
Augusta, Maine 04333-0135

RE: American Leadership Committee – Maine

Dear Commissioners:

We represent American Leadership Committee – Maine (“*ALC-ME*”). We write in response to a complaint filed regarding a mailer that ALC-ME reported with an expenditure date of October 12, 2022 (the “Mailer”). Complainants object that the Mailer’s disclaimer listed “No top donors,” and the Commission queries whether the October 12, 2022 date is the date that the expenditure was “made” under Maine law.¹

ALC-ME’s parent organization, American Leadership Committee – along with ALC-ME’s sole funder, the Democratic Legislative Campaign Committee – must comply with reporting and donor attribution requirements in jurisdictions across the country. These state laws differ and often conflict with one another. ALC-ME has made a good faith effort to comply with Maine’s complex (and relatively new) reporting and disclaimer rules and believes it has done so, for the reasons set forth below. Should the Commission use this proceeding to issue clarifying guidance on these laws, however, ALC-ME is prepared to correct any reports and/or communications to comply with this guidance.

I. Background on ALC-ME, American Leadership Committee, and the Democratic Legislative Campaign Committee

The American Leadership Committee (“*ALC*”) is a section 527 political organization incorporated in the District of Columbia. Unlike so-called “dark money” organizations, ALC discloses its donors (and expenditures) on publicly available reports filed with the Internal Revenue Service (“*IRS*”).² Simply put, there is no mystery about who funds ALC; the information is available to the public.

ALC makes independent expenditures. It is funded primarily by the Democratic Legislative Campaign Committee (“*DLCC*”), a section 527 political organization dedicated to electing state Democrats. ALC is separately incorporated from the DLCC, maintains its own bank accounts, and reports its own spending. Like ALC, the DLCC discloses its donors (and expenditures) on

¹ *Complaint against American Leadership Committee-Maine PAC*, (Oct. 17, 2022), <https://www.maine.gov/ethics/sites/maine.gov.ethics/files/inline-files/3%20-%20American%20Leadership%20Committee-Maine%20PAC.pdf>.

² *American Leadership Committee*, IRS: Political Organization Disclosures, <https://forms.irs.gov/app/pod/basicSearch/search?execution=e1s3&pacid=63162&format=> (last visited Oct. 21, 2022).

publicly available reports filed with the IRS.³ Again, there is no mystery about who funds the DLCC; the information is available to the public.

Where required by state law, ALC establishes state PACs through which it makes its independent expenditures. ALC-ME is ALC's state PAC in Maine through which it makes Maine independent expenditures.⁴

II. Top Donor Disclosure Under Maine Law

A. Legal Discussion

Maine law requires an independent expenditure communication of more than \$250 to include the following statement: "The top 3 funders of (name of entity that made the independent expenditure) are (names of top 3 funders)."⁵

As of 2019, the Maine Ethics Commission's regulations provide that "if the communication is funded by a political action committee *that is fully funded or controlled by another political action committee or legal entity*, the top three funders to be listed are the top three funders of that entity that fully funds or controls the political action committee."⁶ A Maine committee like ALC-ME that has only one funder is covered by this regulation because it is "fully funded ... by another ... legal entity." Per the regulation, such a fully-funded committee may *not* include the direct source of its funding in its "top funder" disclosure on independent expenditure communications. Instead, such a committee is required by law to assess the top three funders *to its funder*.

In making that assessment, an IE spender must follow Maine's laws for identifying top funders. When identifying the top three funders, Maine law instructs as follows:

- (1) "When compiling the list of top funders, an entity making an independent expenditure may disregard any funds that the entity can show were used for purposes unrelated to the candidate mentioned in the communication on the basis that funds were either spent in the order received or were strictly segregated in other accounts;"⁷ and
- (2) The top-funder disclosure statement "is not required to include the name of any funder who has provided less than \$1,000 to the entity making the independent expenditure since the day following the most recent general election day."⁸

ALC-ME understands the first requirement to be a "reasonable accounting method" rule, whereby an entity must use a consistent method to identify the sources of its funding. Maine law

³ *Id.*, Democratic Legislative Campaign Committee, IRS: Political Organization Disclosures, <https://forms.irs.gov/app/pod/basicSearch/search?execution=e1s5&pacid=4103&format=> (last visited Oct. 21, 2022).

⁴ *American Leadership Committee – Maine*, Committees: Maine Ethics Comm'n, <https://mainecampaignfinance.com/#/exploreCommitteeDetail/454265> (last visited Oct. 21, 2022).

⁵ Me. Rev. Stat. tit. 21-A, § 1014(2-B).

⁶ Code Me. R. tit. 94-270 Ch. 1, § 7(12)(D) (emphasis added).

⁷ Me. Rev. Stat. tit. 21-A, § 1014(2-B)(E).

⁸ *Id.* at § 1014(2-B)(C).

suggests some potential methods, but there may be others as well. Other states employ such rules too. Michigan law, for example, provides that “[i]temized fund transfers received by an affiliate PAC from a parent committee may be disclosed under the Campaign Finance Act through the ‘Last-In-First-Out’ (LIFO) accounting method or any other reasonable accounting method.”⁹ Likewise, federal law requires that a political committee “must demonstrate through a reasonable accounting method that, whenever such an organization makes a contribution or expenditure, or payment, the organization has received sufficient funds subject to the limitations and prohibitions of the Act to make such contribution, expenditure, or payment.”¹⁰

B. DLCC Methodology for Reporting Small Dollar Donors

The DLCC typically makes contributions and/or expenditures in more than twenty states each election cycle. Each state has different campaign finance laws. To comply with reporting rules across multiple jurisdictions, the DLCC has adopted a protocol for tracking which donors’ funds are used in each jurisdiction. Prior to, or within a reasonable time after, funds are spent in a state, the DLCC identifies the donors whose funds were used to make the applicable contribution or expenditure. Once marked as spent in a particular state, that donor’s contribution is no longer eligible to be spent in any other state.

Due to the change in Maine law in 2019, ALC-ME could not list DLCC as its top donor. Accordingly, DLCC changed its funding strategy in advance of the 2022 election and determined that it would only fund independent expenditure communications with funds from its Low Individual Account, a separate bank account into which only small-dollar contributions (up to \$4,999.99 per calendar year) from individuals are eligible to be deposited. Moreover, the DLCC determined that it would attribute its contributions to ALC-ME only to donors whose contributions since November 4, 2020 were less than \$1,000 in the aggregate, provided that sufficient funds of that type remained in the Low Individual Account at the time of each contribution.

On October 3, 2022, October 12, 2022, October 17, 2022, October 20, 2022, and October 21, 2022, DLCC made contributions to ALC-ME to support its Maine independent expenditure communications.¹¹ Those contributions consisted of funds entirely from donors who contributed less than \$1,000 to DLCC since the day following the last general election, using the DLCC’s accepted protocol for attributing donors to state-level contributions or expenditures. A list of these donors’ names, the amount and date of their contribution to DLCC, and their aggregate total contributions to DLCC since November 4, 2020 is attached as Exhibit A. These contributions were made to DLCC for the general support of DLCC’s mission to elect state Democrats and were not earmarked for Maine spending. None of these contributions had been previously identified or marked as funding a contribution or expenditure in another state; now that these contributions are being used to finance DLCC’s contributions to ALC-ME, they will

⁹ Mich. Bureau of Elections, *PAC Manual, Appendix K: Out of State Groups*, (Jan. 2, 2019), <https://mertsplus.com/mertsuserguide/index.php?n=MANUALS.AppendixK>

¹⁰ 11 CFR 102.5(b)(1).

¹¹ These contributions will be reported on ALC-ME’s pre-election report. A separate contribution from DLCC on September 20, 2022 was spent entirely on polling and not on the Mailer at issue in this complaint or any other independent expenditure communication. *See* American Leadership Committee – Maine, October Quarterly Report (Oct. 5, 2022).

not be identified or marked as funding a contribution or expenditure in another state in the future. Because ALC-ME is fully funded by the DLCC, the top three donors to be listed on its independent expenditures are those of the DLCC.¹² Maine law instructs that DLCC should exclude funds that they can show were used for purposes unrelated to the candidates mentioned in the communication. And because all contributions that are attributable to the Maine communications are from under-\$1,000 donors, ALC-ME was correct to include “no top donors” on the disclaimer.¹³

Given the complexity of their operations, ALC-ME and DLCC believes the “No top donors” statement under its reasonable accounting method represents a good faith effort to comply with the law. If the Commission disagrees, ALC-ME is willing to work with the Commission and Commission staff to modify the disclaimer on digital ads currently running and future mailers as provided under Me. Rev. Stat. tit. 21-A, § 1014(4).

III. The Earliest Date that ALC-ME Made an Expenditure for the Mailer Was October 12, 2022.

A. Maine Law Requires Disclosing an Independent Expenditure Made Between 60 and 14 Days Before An Election Within 48 Hours of When the Expenditure is Made

Maine requires committees making independent expenditures in excess of \$250 from the 60th day through the 14th day before an election to file a report “within two calendar days of the expenditure.”¹⁴ An “expenditure” is defined to include a “contract, promise or agreement, expressed or implied, whether or not legally enforceable, to make any expenditure.”¹⁵ Maine’s Political Action Committee Guidebook says that an expenditure is “considered made at the earliest of the following events:

- the placement of an order for a good or service;
- the signing of a contract for a good or service;
- the delivery of a good or service;
- a promise or an agreement to pay; or
- the payment for a good or service.”¹⁶

B. ALC’s Independent Expenditure Process Generally

As an organization with a national mission to elect state Democrats, ALC’s independent expenditure program moves with speed and flexibility. For example, for a mail program, ALC will hire a mail vendor to develop mail concepts for multiple candidates and across multiples states, but not all of these concepts will make it to print. For those that do make it to print, ALC may take advantage of bulk printing discounts to print mailers for a group of candidates, but

¹² See Code Me. R. tit. 94-270 Ch. 1, § 7(12)(D).

¹³ Me. Rev. Stat. tit. 21-A, § 1014(2-B)(C).

¹⁴ Code Me. R. tit. 94-270 Ch. 1, § 10(3)(B)(2).

¹⁵ Me. Rev. Stat. tit. 21-A, § 1012(3).

¹⁶ Me. Ethics Comm’n, *Political Action Committee Guidebook* at 20 (December 2021), <https://www.maine.gov/ethics/sites/maine.gov.ethics/files/inline-files/PAC%20Guidebook.pdf>.

ultimately send mailers to just some of the candidates depending on the available budget for postage.

It is a common practice in the campaign industry at this time of year to cut program even after investment costs have been sunk for revenue reasons. In fact, ALC's revenue has come in under projections, leaving ALC to make difficult choices on a compressed timeline about what projects to keep funding.

ALC pays its printer 60 days in arrears and pre-pays for postage. That provides a 60-day cushion to cover sunk printing costs should a mailer not make it to the public after it has been printed.

C. Under Its Independent Expenditure Process, October 12 Was the Earliest Date the Expenditure Was Made

For the Mailer at issue in this complaint, ALC-ME reported the date that the first payment for the Mailer was made, an October 12, 2022 pre-payment for postage. That postage was invoiced originally on October 8, and the templates were sent to the printer on October 5; the Mailer was deposited with the United States Postal Service on October 13.

Because of the need to maintain flexibility in its program, ALC-ME did not commit to disseminating the Mailer until it paid the invoice on October 12, and that is the earliest date that the expenditure was finally made. There was no "promise to make an expenditure" when the templates were sent to the printer or invoiced, because the decision to make the expenditure for the purpose of influencing a state election—i.e., the decision to *disseminate* the Mailer to voters via the United States Postal Service—had not yet been made. A mailer that is printed *but never sent to voters* is not an "expenditure" under Maine law. ALC-ME's 48-hour report included the true costs of the postage that was pre-paid (\$5,448.44) as well as estimated costs for the production (\$12,698), which was reported as a debt owed and will be paid according to the 60-day schedule agreed to with that vendor.

Thus, ALC-ME timely filed its 48-hour report within two calendar days of making the expenditure at issue here.

We are happy to answer any questions during the Commission's October 26, 2022 hearing.

Yours truly,



Jonathan Berkon
Emily Hogin
Counsel to American Leadership Committee – Maine

EXHIBIT A

October 3, 2022 Transfer

Donor Name	Date Received	Amount	Employer	Occupation	Home City	Home State/Province	Home Street Address	Home Zip/Postal
Matthews, Pam	9/25/2022	6	Kaiser Foundation Hospitals And Health Plan	Ethics and Compliance Rn	Molalla	OR	44002 S Elk Prairie Rd	97038
Tannenwald, Robert	9/25/2022	25	Brandeis University	Economist	Swampscott	MA	441 Essex St Unit 202	1907
Blick, Clayton	9/25/2022	50	Not Employed	Not Employed	Litchfield	CT	102 Naser Rd	6759
Jahan, Youngmin	6/26/2022	50	Not Employed	Not Employed	Philadelphia	PA	1426 S 9th St	19147
Beauboeuf, Gladys	9/25/2022	25	Not Employed	Not Employed	Pembroke Pines	FL	250 S Hollybrook Ter Apt 206	33025
Collins, Judy	6/26/2022	5	Self-Employed	Entertainer	New York	NY	845 W End Ave Apt 10E	10025
Collins, Judy	9/25/2022	5	Self-Employed	Entertainer	New York	NY	845 W End Ave Apt 10E	10025
Romo, Ralph	6/26/2022	10	Not Employed	Not Employed	Lodi	CA	101 Tree Ct	95240
Wallace, Susan	6/26/2022	7	Not Employed	Not Employed	Houston	TX	13707 Apple Knoll Ct	77059
Hantman, Stuart	6/26/2022	3	Not Employed	Not Employed	Pittsford	NY	28 Founders Grn	14534
Tacker, Sarah	6/26/2022	10	SAS	Programmer	Raleigh	NC	4009 Huckleberry Dr	27612
Tacker, Sarah	6/26/2022	7	SAS	Programmer	Raleigh	NC	4009 Huckleberry Dr	27612
Tacker, Sarah	9/25/2022	10	SAS	Programmer	Raleigh	NC	4009 Huckleberry Dr	27612
Tacker, Sarah	9/25/2022	4	SAS	Programmer	Raleigh	NC	4009 Huckleberry Dr	27612
Osborn, William	9/25/2022	7	Not Employed	Not Employed	Dunnellon	FL	9925 SW 189th Cir	34432
Magrini, Brian	6/26/2022	100	INTEGRIS Health	Analyst	Oklahoma City	OK	2825 Manchester Dr	73120
Taft, Bonnie	6/26/2022	25	UCSF	Nurse Practitioner	San Francisco	CA	633 6th Ave	94118
Taft, Bonnie	9/25/2022	25	UCSF	Nurse Practitioner	San Francisco	CA	633 6th Ave	94118
Olson, John	6/26/2022	100	Elekta	Sales	San Diego	CA	702 Broadway Unit 3405	92101
Olson, John	9/25/2022	100	Elekta	Sales	San Diego	CA	702 Broadway Unit 3405	92101
O'Malley, William	6/26/2022	100	Retired	Retired	Sahuarita	AZ	251 W Calle Media Luz	85629
Murphy, Diane	6/26/2022	100	Syracuse University	Academic	Syracuse	NY	123 Concord Pl	13210
Penzell, Gary	9/25/2022	25	Not Employed	Not Employed	Houston	TX	5110 San Felipe St Unit 323W	77056
Berklich, Shari	6/26/2022	10	Not Employed	Not Employed	Oxford	MI	75 W Burdick St	48371
Nakasono, Alan	6/26/2022	10	Hawaii DOE	Sub Teacher P and T	Honolulu	HI	PO Box 3262	96801
Shaffer, Marsha	6/26/2022	10	Not Employed	Not Employed	Atlanta	GA	3376 Peachtree Rd NE	30326
Shaffer, Marsha	9/25/2022	10	Not Employed	Not Employed	Atlanta	GA	3376 Peachtree Rd NE	30326
Labarre, Jackie	6/26/2022	10	Self-Employed	Life Coach	Arlington	VA	4868 28th St S	22206
Labarre, Jackie	9/25/2022	10	Self-Employed	Life Coach	Arlington	VA	4868 28th St S	22206
England, Douglas	6/26/2022	10	Not Employed	Not Employed	Delray Beach	FL	6124 La Palma Ln	33484
Ackerman, Kay	6/26/2022	25	Retired	Retired	Glenville	NY	150 Dutch Meadows Ln Apt 334	12302
Fair, Dale	6/26/2022	100	Not Employed	Not Employed	York	PA	2169 Salisbury St	17408
Schelbly, Sherleen	6/26/2022	5	Not Employed	Not Employed	Champaign	IL	1620 Congressional Way	61822
Johnson, Georgia	6/26/2022	10	Not Employed	Not Employed	Slidell	LA	312 E Silver Maple Dr	70458
Johnson, Georgia	9/25/2022	10	Not Employed	Not Employed	Slidell	LA	312 E Silver Maple Dr	70458
Lettre, Michel	9/25/2022	25	Not Employed	Not Employed	Owings Mills	MD	3810 Thoroughbred Ln	21117
Zilber, Karen	6/26/2022	15	Not Employed	Not Employed	Kings Park	NY	24 Indian Trce	11754
Zilber, Karen	9/25/2022	15	Not Employed	Not Employed	Kings Park	NY	24 Indian Trce	11754
Williams, David	9/25/2022	25	Not Employed	Not Employed	Alhambra	CA	2529 Montezuma Ave	91803
Johnson, Carol A.	6/26/2022	10	Not Employed	Not Employed	Blaine	MN	732 Oak Ridge Trl NE	55434
Christian, Robbie	6/26/2022	25	Not Employed	Not Employed	Rio Rancho	NM	880 Western Hills Dr SE	87124
Christian, Robbie	6/26/2022	25	Not Employed	Not Employed	Rio Rancho	NM	880 Western Hills Dr SE	87124
Christian, Robbie	9/25/2022	25	Not Employed	Not Employed	Rio Rancho	NM	880 Western Hills Dr SE	87124
Christian, Robbie	9/25/2022	25	Not Employed	Not Employed	Rio Rancho	NM	880 Western Hills Dr SE	87124
Semp, Jim	6/26/2022	10	Self-Employed	Manager	Ithaca	NY	302 King Rd E	14850
Lovett, Glenna	6/26/2022	6	Not Employed	Not Employed	Laguna Beach	CA	396 Myrtle St	92651
Lovett, Glenna	6/26/2022	5	Not Employed	Not Employed	Laguna Beach	CA	396 Myrtle St	92651
Lovett, Glenna	9/25/2022	6	Not Employed	Not Employed	Laguna Beach	CA	396 Myrtle St	92651
Lovett, Glenna	9/25/2022	5	Not Employed	Not Employed	Laguna Beach	CA	396 Myrtle St	92651
Cabot, Thomas	6/26/2022	25	Retired	Retired	Sun City	AZ	9326 W Cedar Hill Cir N	85351
Vawter, Janet	6/26/2022	25	VHA	Registered Nurse	Lakeland	TN	3773 Piper Bay Ln	38002
Vawter, Janet	9/25/2022	25	VHA	Registered Nurse	Lakeland	TN	3773 Piper Bay Ln	38002
Bachenberg, Steven	6/26/2022	25	Not Employed	Not Employed	Lawrence	KS	1216 N 1066 Rd	66047
Susskind, Andrew	9/25/2022	25	Drexel University	Professor	Narberth	PA	309 Hampden Ave	19072
Church, Clyde	6/26/2022	25	Not Employed	Not Employed	Durango	CO	400 Oakcrest Dr	81301
Church, Clyde	6/26/2022	25	Not Employed	Not Employed	Durango	CO	400 Oakcrest Dr	81301
Carney, Bill	6/26/2022	6	Ashland University	Educator	Columbia	MO	2600 Ridgefield Rd	65203
Grannis, Tekla	6/26/2022	25	Not Employed	Not Employed	Monrovia	CA	435 N Canyon Blvd	91016
Sekar, Betsy	6/26/2022	38	Not Employed	Not Employed	Fort Wayne	IN	4520 Old Mill Rd	46807
Holder, Terry	6/26/2022	50	Not Employed	Not Employed	Dixon	CA	385 Anchor Ct	95620
Hopkins, Jane	6/26/2022	25	Not Employed	Not Employed	Saratoga	CA	20650 Lomita Ave	95070
Torrest, Michael	9/25/2022	5	Not Employed	Not Employed	San Francisco	CA	1840 Washington St	94109
Torrest, Michael	9/25/2022	5	Not Employed	Not Employed	San Francisco	CA	1840 Washington St	94109
Kirkwood, Mary Anne	9/25/2022	5	Not Employed	Not Employed	San Francisco	CA	1031 Greenwich St	94133
Zuckerman, Helen	6/26/2022	7	Not Employed	Not Employed	Union Pier	MI	10361 Randall Rd	49129
Frazier, Elisabeth	6/26/2022	5	Woodycrest Center	Fiscal Officer	Poughkeepsie	NY	111 Violet Ave	12601
Frazier, Elisabeth	9/25/2022	5	Woodycrest Center	Fiscal Officer	Poughkeepsie	NY	111 Violet Ave	12601
Bruno, Sharon	6/26/2022	5	Towe of Greenwich BDE	Admin. Assistant	Suffield	CT	129 Halladay Ave E	6078
Morales, Joseph	6/26/2022	10	Not Employed	Not Employed	Aibonito	PR	52 Calle Laurel Blanco	705
Ronquillo, Annie	6/26/2022	5	Not Employed	Not Employed	Pueblo West	CO	898 S Cellini Plz	81007
Ronquillo, Annie	9/25/2022	5	Not Employed	Not Employed	Pueblo West	CO	898 S Cellini Plz	81007
Pritchard, Mary	6/26/2022	25	Not Employed	Not Employed	Jasper	GA	251 Rebecca St	30143
McLaughlin, Margaret	6/26/2022	10	Not Employed	Not Employed	Philadelphia	PA	8900 Norwood Ave	19118
Kirst, William	6/26/2022	7	Related	Sales	Miami	FL	601 NE 36th St Apt 1003	33137
Miller, Mary	6/26/2022	25	Not Employed	Not Employed	Platte City	MO	13325 Running Horse Rd	64079
Hewitt, Deborah	6/26/2022	25	Self-Employed	Physician	Ruidoso Downs	NM	PO Box 2871	88346
Nakashima, Jane	6/26/2022	7	Not Employed	Not Employed	Gig Harbor	WA	2107 14th Ave NW	98335
Castens, Marcia	9/25/2022	5	Blue Coast Cardiology	Cardiovascular Tech	Carlsbad	CA	2381 Jefferson St Apt A	92008
Crane, Scott	6/26/2022	4	Not Employed	Not Employed	Oxford	GA	1189 Mount Zion Rd	30054
Oniell, Jane	6/26/2022	7	Not Employed	Not Employed	New York	NY	435 E 86th St	10028
Minocha, Anil	9/25/2022	10	Banner Health	Physician	Phoenix	AZ	5725 W Bajada Rd	85083

Anderson, Nancy	9/25/2022	25	Not Employed	Not Employed	Los Angeles	CA	2300 Westridge Rd	90049
Kratzman, Steve	9/25/2022	100	Not Employed	Not Employed	Ossining	NY	29 Birch Ct	10562
Hays, Connie	9/25/2022	25	Not Employed	Not Employed	Hereford	AZ	7914 S Broken Arrow Rd	85615
Bertapelle, Carol	6/26/2022	10	SkillsPay	Accounting	Spokane	WA	239 W Main Ave Apt 6	99201
Bertapelle, Carol	6/26/2022	10	SkillsPay	Accounting	Spokane	WA	239 W Main Ave Apt 6	99201
Bertapelle, Carol	9/25/2022	25	SkillsPay	Accounting	Spokane	WA	239 W Main Ave Apt 6	99201
Steiner, Lois	6/26/2022	10	Retired	Retired	Battle Ground	WA	20216 NE 190th Ave	98604
Kramer, Ellen	6/26/2022	5	Not Employed	Not Employed	Green Bay	WI	1820 Harold St	54302
Dwyer, Timothy	6/26/2022	50	Self-Employed	Family Therapist	Evanston	IL	608 Hinman Ave Apt 45	60202
Davies, Stevenson	6/26/2022	50	Not Employed	Not Employed	Merrimac	MA	8 Greenleaf Dr Apt K	1860
Maves, Ryan	6/26/2022	38	Government	Physician	Winston Salem	NC	2750 Old Town Club Rd	27106
Maves, Ryan	9/25/2022	38	Government	Physician	Winston Salem	NC	2750 Old Town Club Rd	27106
Lytton, Lynn	9/25/2022	25	MAPS for Recovery	Physician	Austin	TX	12308 Split Rail Pkwy	78750
Wollesen, Janice	6/26/2022	10	Not Employed	Not Employed	Minneapolis	MN	7150 Cahill Rd Apt 301	55439
Wollesen, Janice	9/25/2022	10	Not Employed	Not Employed	Minneapolis	MN	7150 Cahill Rd Apt 301	55439
Tenny, Nancy Robin	6/26/2022	10	Not Employed	Not Employed	Exeter	NH	7 Riverwoods Dr Apt C115	3833
Mstlack, Linda	6/26/2022	25	Not Employed	Not Employed	Wilton Manors	FL	1517 NE 26th St	33305
Hergert-Knox, Kathe	6/26/2022	7	Not Employed	Not Employed	Lake Oswego	OR	4340 Chapman Way	97035
Ferguson, Earl	6/26/2022	7	Ferguson Malone Architects	Architect	Irvington	NY	14 S Ferris St	10533
Matthews, John	6/26/2022	3	The DC Bar	Facilities Asst	Washington	DC	1737 Johnson Ave NW	20009
Henebry, Kath	6/26/2022	7	University of Nebraska at Omaha	Professor	Omaha	NE	5912 N 108th Avenue Cir	68164
White Owl, Randy Sr	6/26/2022	10	TAT Gaming Commission	Surveillance Director	New Town	ND	PO Box 876	58763
McAden, Patricia	9/25/2022	7	Not Employed	Not Employed	Springfield Gardens	NY	12137 197th St	11413
Hartinger, James	9/25/2022	25	Kaiser Permanent	Director IT Support	Walnut Creek	CA	1310 Alma Ave Apt 210	94596
Scherer, Peter	6/26/2022	25	Not Employed	Not Employed	Mclean	VA	7314 Hooking Rd	22101
Neira, Linda	6/26/2022	10	Not Employed	Not Employed	Somers	NY	582 Heritage Hls Unit B	10589
Ridgeway, Donna	6/26/2022	10	Not Employed	Not Employed	Missoula	MT	202 W Beckwith St W	59801
Matranga, Johnnie	6/26/2022	10	Not Employed	Not Employed	Sacramento	CA	2026 Forrest St	95815
Duras, Connie	9/25/2022	50	Boulder Co	Animal Care	Firestone	CO	104 Jackson Dr	80520
Thorson, John	9/25/2022	25	Boston Science	Data Analst	Mazepa	MN	41997 585th St	55956
White, Mary Jolynne	6/26/2022	25	Wyzant	Tutor	Pineville	NC	PO Box 676	28134
Lober, George	6/26/2022	25	Not Employed	Not Employed	Bear	DE	419 Nilsen Rd	19701
Cathaway, Linda	9/25/2022	20	Not Employed	Not Employed	Oak View	CA	235 Alto Dr	93022
Erickson, Pamela	9/25/2022	20	Not Employed	Not Employed	Milwaukee	WI	2459 N 69th St	53213
McCabe, Charles	6/26/2022	10	Not Employed	Not Employed	Santa Fe	NM	3101 Old Pecos Trl Unit 241	87505
Nash, Stephanie	6/26/2022	25	Not Employed	Not Employed	Eagan	MN	1829 Trailway Dr Apt 3	55122
Cramer, Kathleen	6/26/2022	25	Not Employed	Not Employed	Highland	CA	28670 Glenheather Dr	92346
Cramer, Kathleen	6/26/2022	25	Not Employed	Not Employed	Highland	CA	28670 Glenheather Dr	92346
Spivey, Anthony	6/26/2022	10	King County	Corrections Officer	Covington	WA	26009 189th Ave SE	98042
Paulen, Robert	6/26/2022	10	Not Employed	Not Employed	Dewey Beach	DE	22 Read Ave	19971
Bowman, William J.	9/25/2022	100	Not Employed	Not Employed	Chadds Ford	PA	1805 Masters Way	19317
Hart, Donald	6/26/2022	25	Not Employed	Not Employed	Herrndon	VA	13400 Amy Way	20171
Williams, Alma	9/25/2022	10	Not Employed	Not Employed	Crest Hill	IL	1360 Pioneer Rd Apt 101	60403
Lance, Janice	6/26/2022	10	Not Employed	Not Employed	Las Vegas	NV	8250 N Grand Canyon Dr Unit 2154	89166
Weiner, Wynne	6/26/2022	25	Access Luxury Group LLC	Designer	Salisbury	CT	4 Ravine Ridge Rd	6068
Delanty, Thomas	6/26/2022	50	Not Employed	Not Employed	Urbana	IL	1901 A E Amber Ln	61802
Schor, Laurence	6/26/2022	50	Asmar Schor and McKenna	Attorney	Bethesda	MD	7021 Mountain Gate Dr	20817
Gaskill, George	6/26/2022	10	Not Employed	Not Employed	Murfreesboro	TN	5034 Saint Ives Dr	37128
Gaskill, George	9/25/2022	5	Not Employed	Not Employed	Murfreesboro	TN	5034 Saint Ives Dr	37128
Triplet, Nancy	6/26/2022	10	Not Employed	Not Employed	Boulder	CO	7378 Buckingham Ct	80301
Triplet, Nancy	9/25/2022	10	Not Employed	Not Employed	Boulder	CO	7378 Buckingham Ct	80301
Bianco, Patricia	9/25/2022	10	Not Employed	Not Employed	Sunrise	FL	11310 NW 31st St	33323
Bianco, Patricia	9/25/2022	10	Not Employed	Not Employed	Sunrise	FL	11310 NW 31st St	33323
Ballentine, John	6/26/2022	50	Not Employed	Not Employed	San Francisco	CA	109 Diamond Cove Ter	94134
Anderson, Stanton	6/26/2022	25	Munitech Inc.	Meter Technician	Howard Lake	MN	8372 15th St SW	55349
Phurrough, Paula	6/26/2022	38	Not Employed	Not Employed	Columbia	MD	8872 Shining Oceans Way	21045
Horan Sholl, Debra	6/26/2022	25	Not Employed	Not Employed	Davidsonville	MD	1086 Galway Rd	21035
Horan Sholl, Debra	6/26/2022	25	Not Employed	Not Employed	Davidsonville	MD	1086 Galway Rd	21035
Miller, Ron	6/26/2022	50	Not Employed	Not Employed	Nevis	MN	19400 Edelweiss Dr Apt 103	56467
Sue Shropshire, Linda	6/26/2022	50	Not Employed	Not Employed	Miller Place	NY	8 Parkside Ave	11764
Adloff-Holschneider, Christine	6/26/2022	50	LAC-DHS	Physician	Los Angeles	CA	931 Chantilly Rd	90077
Laskowski, Carol J.	6/26/2022	50	Not Employed	Not Employed	Libertyville	IL	300 E Church St Unit 201	60048
Corrie-McIntyre, Diane	6/26/2022	3	Self-Employed	Accountant and Bookkeeper	Palo Alto	CA	357 Bryant Ct	94301
Bridges, Norma J.	6/26/2022	7	Not Employed	Not Employed	Herrndon	VA	3224 Kinross Cir	20171
Coomes, Harlan	9/25/2022	5	Not Employed	Not Employed	Carmichael	CA	6948 Grant Ave	95608
Jue, Elaine	6/26/2022	7	Not Employed	Not Employed	San Francisco	CA	1683 38th Ave	94122
Hasselquist, Charlene	9/25/2022	20	Not Employed	Not Employed	Land O Lakes	FL	3621 Gerrads Cross Ct	34638
Kodama, Nancy	9/25/2022	10	Not Employed	Not Employed	Walnut	CA	21815 E Chestnut Ct # T	91789
Kodama, Nancy	9/25/2022	7	Not Employed	Not Employed	Walnut	CA	21815 E Chestnut Ct # T	91789
Kodama, Nancy	9/25/2022	7	Not Employed	Not Employed	Walnut	CA	21815 E Chestnut Ct # T	91789
Clough, Barb	6/26/2022	25	Not Employed	Not Employed	West Chesterfield	NH	115 Hutchins Rd	3466
Burga, Rafael Martin	6/26/2022	10	Freelance	Video Editing	New York	NY	870 Saint Nicholas Ave Apt F2	10032
Burga, Rafael Martin	6/26/2022	10	Freelance	Video Editing	New York	NY	870 Saint Nicholas Ave Apt F2	10032
Burga, Rafael Martin	6/26/2022	10	Freelance	Video Editing	New York	NY	870 Saint Nicholas Ave Apt F2	10032
Burga, Rafael Martin	9/25/2022	18	Freelance	Video Editing	New York	NY	870 Saint Nicholas Ave Apt F2	10032
Biernacki, Lynne	6/26/2022	6	Not Employed	Not Employed	Grand Haven	MI	14400 178th Ave	49417
Biernacki, Lynne	9/25/2022	6	Not Employed	Not Employed	Grand Haven	MI	14400 178th Ave	49417
Demain, Pamela	6/26/2022	5	Not Employed	Not Employed	Madison	NJ	43 Woodland Rd	7940
Christenson, Susan	9/25/2022	10	Not Employed	Not Employed	Portland	OR	3174 SE Deswell St	97267
Draper, Steve	6/26/2022	10	Not Employed	Not Employed	Surprise	AZ	16807 W Sabino Canyon Ln	85387
Ulbert, Thomas	9/25/2022	5	Not Employed	Not Employed	Grayslake	IL	15 Cambridge Dr	60030
Schilling, John	6/26/2022	10	Not Employed	Not Employed	White Bear Lake	MN	1275 Halper Pl	55110
Alter, Harvey	6/26/2022	50	NIH	Physician	Chevy Chase	MD	4709 Cumberland Ave	20815

Obembe, Ireti	6/26/2022	10	Not Employed	Not Employed	Brooklyn	NY	1411 Linden Blvd	11212
Obembe, Ireti	9/25/2022	5	Not Employed	Not Employed	Brooklyn	NY	1411 Linden Blvd	11212
Meade, Kathie	9/25/2022	5	Not Employed	Not Employed	Leland	NC	1017 Maplechase Dr SE	28451
Garrett, Bridget	6/26/2022	10	Not Employed	Not Employed	Makawao	HI	3584 Kekolu Pl	96768
Schmidt, Louis	6/26/2022	7	Not Employed	Not Employed	Commack	NY	31 Comanche Ln	11725
Gardiner, Margaret	6/26/2022	25	Self-Employed	Massage Therapist	Cornville	AZ	270 S Merritt Ranch Rd	86325
Army, James	9/25/2022	5	Not Employed	Not Employed	Pacifica	CA	1540 Terra Nova Blvd	94044
McDonald, David	9/25/2022	7	Not Employed	Not Employed	Rehoboth Beach	DE	35571 Dry Brook Dr	19971
Hodge, Janie	6/26/2022	5	Not Employed	Not Employed	Rome	GA	63 Atkins Dr SE	30161
Miksche, Michael	6/26/2022	25	General Atomics	Contracts Manager	Huntsville	AL	5 Leyland Dr SW	35824
McCormick, Shari	6/26/2022	10	Not Employed	Not Employed	Saint Louis	MO	5933 Sherry Ave	63136
Ghent, Donald	6/26/2022	10	Gensler	Architect	Adelphi	MD	2706 Falling Brook Ter	20783
Ghent, Donald	9/25/2022	25	Gensler	Architect	Adelphi	MD	2706 Falling Brook Ter	20783
Rath, Carol	6/26/2022	10	Not Employed	Not Employed	Mankato	MN	10 Bela Vista Ct	56001
Mathai, Stephen	9/25/2022	25	Retired	Retired	Centerville	OH	1780 Valleybrook Pl	45459
Allison, Janet	9/25/2022	10	Not Employed	Not Employed	Garden Valley	CA	4201 Windhaven Ln	95633
Schindler, Margaret	6/26/2022	10	Not Employed	Not Employed	Athens	GA	115 Orchard Creek Dr	30606
Palekar, Sharad	9/25/2022	25	Not Employed	Not Employed	Apex	NC	1201 Magnolia Row Trl	27502
Balas, Philip	6/26/2022	10	Self-Employed	Attorney	Palm Beach Gardens	FL	8 Marlwood Ln	33418
Smyrl, Norman	6/26/2022	7	CNS	Development Chemist	Knoxville	TN	11319 Berry Hill Dr	37931
Long, Richard	6/26/2022	20	Not Employed	Not Employed	Henderson	NV	248 Jameson Cir	89074
Geller, Maureen	6/26/2022	25	Not Employed	Not Employed	Brooklyn	NY	548 46th St	11220
Jackson, Gary	6/26/2022	100	Not Employed	Not Employed	Bella Vista	AR	5 Dunsford Dr	72715
Holdredge, David	6/26/2022	50	Not Employed	Not Employed	Bryan	TX	2845 Persimmon Ridge Ct	77807
Schafer, Sandra	6/26/2022	10	Not Employed	Not Employed	Pentwater	MI	530 6th St	49449
Black, Susan	6/26/2022	25	Not Employed	Not Employed	Sequim	WA	122 Jesslyn Ln	98382
Matthews, Eugene	9/25/2022	25	Not Employed	Not Employed	New Castle	DE	77 Commonwealth Blvd	19720
Matthews, Eugene	9/25/2022	25	Not Employed	Not Employed	New Castle	DE	77 Commonwealth Blvd	19720
Gelbert, Susan	6/26/2022	25	Not Employed	Not Employed	Richmond	VA	1600 Westbrook Ave Apt 627	23227
Dubose-Frasier, Annie	6/26/2022	5	Not Employed	Not Employed	New Haven	CT	82 Diamond St	6515
Donica, Christine	6/26/2022	10	Not Employed	Not Employed	Canton	MI	43121 Arlington Rd	48187
Donica, Christine	9/25/2022	10	Not Employed	Not Employed	Canton	MI	43121 Arlington Rd	48187
Keller, Alan	6/26/2022	75	Not Employed	Not Employed	Canton	GA	400 Eaglewood Way	30115
Helsell, Frank	6/26/2022	25	Not Employed	Not Employed	Gilbert	AZ	6551 S Classic Way	85298
Langhorne, Webster L.	6/26/2022	7	Not Employed	Not Employed	College Park	GA	4590 Jaillette Trce	30349
McKenna, Katherine	6/26/2022	5	Not Employed	Not Employed	Sayville	NY	369 Wyandanch Rd	11782
McKenna, Katherine	9/25/2022	5	Not Employed	Not Employed	Sayville	NY	369 Wyandanch Rd	11782
Levine, Ellen	6/26/2022	25	Not Employed	Not Employed	Great Neck	NY	15 Canterbury Rd	11021
Roberts, Jeannie	9/25/2022	18	Self-Employed	Psychiatrist	Louisville	KY	1621 Al Mara Cir	40205
Murphy, Robert	9/25/2022	20	Retired	Retired	Ashland	MO	4891 Democracy Dr	65010
Murphy, Robert	9/25/2022	7	Retired	Retired	Ashland	MO	4891 Democracy Dr	65010
Allensworth, Robert	9/25/2022	10	Self-Employed	Artist and Appraiser	New Rochelle	NY	40 Park Pl	10801
Jubb, Margaret	6/26/2022	7	Not Employed	Not Employed	Bristol	CT	264 Maple Ave	6010
Walsh, Michel	6/26/2022	4	Not Employed	Not Employed	Mansfield	MA	68 Campbell St	2048
Mahoney, Leah	6/26/2022	10	Maine Medical	NP	North Yarmouth	ME	321 New Gloucester Rd	4097
Wilson, Angelica	6/26/2022	25	Not Employed	Not Employed	Philadelphia	PA	136 N Redfield St	19139
Mullins, C. Allen	6/26/2022	10	Self-Employed	Architect	Wilkes Barre	PA	602 THISTLE Ln	18701
Perricelli, Kathleen	6/26/2022	10	Not Employed	Not Employed	Rochester	NY	380 Susquehanna Rd	14618
Lemaire, Colleen	6/26/2022	10	Not Employed	Not Employed	Dallas	OR	481 E Ellendale Ave	97338
Brown, Deette	6/26/2022	10	Not Employed	Not Employed	Haverford	PA	9 Llanalew Rd	19041
Schmidt, Jill	6/26/2022	10	Edina	Realtor	Winona	MN	77 Rivers Ln	55987
Ohara, Kieran	6/26/2022	10	Not Employed	Not Employed	Lexington	KY	700 Mount Vernon Dr # L	40502
Hillyer, Gayle	9/25/2022	23	Not Employed	Not Employed	Rockford	IL	1111 Esmond Dr	61108
Hayes, Gary	6/26/2022	15	Self-Employed	Consultant	North Myrtle Beach	SC	6244 Catalina Dr Unit 1513	29582
Kallor, Susan	6/26/2022	25	Not Employed	Not Employed	West Hartford	CT	107 Lyman Rd	6117
Benford, Alan	9/25/2022	103	Mark Twain House	Historic Interpreter	Manchester	CT	186 New State Rd Apt 40	6042
Darbishon, Marianne	9/25/2022	7	Not Employed	Not Employed	San Francisco	CA	473 Leland Ave	94134
Kalick, Sheila	6/26/2022	3	Not Employed	Not Employed	New York	NY	422 E 72nd St	10021
Rosenthal, Michele	6/26/2022	25	Not Employed	Not Employed	Manhasset	NY	44 Bluebird Hill Ct	11030
Strong, Mindi	6/26/2022	7	Icon Health and Fitness	Administrative Assistant	Hyrum	UT	276 W 20 N	84319
Foster, Brynda	6/26/2022	7	Not Employed	Not Employed	Novato	CA	5 Fallen Leaf Way	94949
Straley, Mary Ann	9/25/2022	25	Not Employed	Not Employed	Cathedral City	CA	27134 Shadowcrest Ln	92234
Perina, Frank	6/26/2022	7	Not Employed	Not Employed	Chester Springs	PA	1908 Art School Rd	19425
Lehmkuhl, Margie	6/26/2022	20	Not Employed	Not Employed	Lake Tapawingo	MO	187 Anchor Cir	64015
Quarles, Laurie	9/25/2022	10	Not Employed	Not Employed	Arlington	VA	1017 N Potomac St	22205
Grindley, William	6/26/2022	50	Not Employed	Not Employed	Los Altos	CA	46 S Gordon Way	94022
Dragan, Linda	6/26/2022	25	Not Employed	Not Employed	East Berlin	CT	PO Box 159	6023
Nguyen, Thao	6/26/2022	4	Not Employed	Not Employed	Santa Clara	CA	2901 Via Roma Pl	95051
Wagner, C.M.	6/26/2022	25	Not Employed	Not Employed	Bloomington	IN	2260 S Olde Mill Dr	47401
Coulter, Linda	6/26/2022	25	Not Employed	Not Employed	Scarsdale	NY	147 Webster Rd	10583
Heiler, Diane	6/26/2022	2	Not Employed	Not Employed	Buchanan	MI	2951 White Oaks Rdg	49107
Dempsey, Suzanne	6/26/2022	10	Architect Of The Capitol	Your Guide	Lovettsville	VA	PO Box 241	20180
Bullin, Mary Jo Jo	9/25/2022	10	Self-Employed	Figure Skating Coach	Julian	NC	3440 Alamance Church Rd	27283
Bullin, Mary Jo Jo	9/25/2022	10	Self-Employed	Figure Skating Coach	Julian	NC	3440 Alamance Church Rd	27283
Acerra, Mike	6/26/2022	10	Not Employed	Not Employed	Califon	NJ	10 Summer Ln	7830
Male, Jonathan	6/26/2022	50	RRx	Marketing	Doylestown	PA	7 Bedford Dr	18902
Ehinger, Julie	6/26/2022	1	Not Employed	Not Employed	Fort Wayne	IN	7927 Oklahoma Trl	46815
Nelson-Neswig, Carleen	6/26/2022	25	Bee Tree Consulting Ltd.	President	Dexter	MI	433 Bee Tree Ln	48130
Miers, James	6/26/2022	25	Not Employed	Not Employed	Avila Beach	CA	6480 Cormorant Way Apt 2478	93424
Blouin, John	6/26/2022	50	Not Employed	Not Employed	Orland Park	IL	10801 Jillian Rd	60467
Beymer, Robert	6/26/2022	25	Not Employed	Not Employed	Ashburn	VA	44735 Audubon Sq Apt 427	20147
Beymer, Robert	6/26/2022	6	Not Employed	Not Employed	Ashburn	VA	44735 Audubon Sq Apt 427	20147
Beymer, Robert	9/25/2022	25	Not Employed	Not Employed	Ashburn	VA	44735 Audubon Sq Apt 427	20147

Beymer, Robert	9/25/2022	6	Not Employed	Not Employed	Ashburn	VA	44735 Audubon Sq Apt 427	20147
Brown, Rick	9/25/2022	25	Self-Employed	Physician	Turner	ME	273 Lower St	4282
Gruber, Judy	6/26/2022	5	Not Employed	Not Employed	Lexington	SC	209 Camden Ct	29072
Schneider, Carol	6/26/2022	25	Retired	Retired	Hampton	VA	11 Melissa Ct	23669
Weeks, K. Brant	6/26/2022	50	Retired	Retired	Benton	AR	420 Lee Ann Ln	72019
Rashidi, Wendy	6/26/2022	25	Wwmg	Medical	Upland	CA	1408 Forest St	91784
Quismondo, John	9/25/2022	25	Bd	Product Owner	National City	CA	2408 J Ave	91950
Jones, Liz	6/26/2022	25	The Ziegler Companies LLC	Administrative Assistant	Ashburn	VA	43148 Wintergrove Dr	20147
Shelton, Jennifer	6/26/2022	10	Not Employed	Not Employed	Detroit	MI	5551 W Outer Dr	48235
Shelton, Jennifer	6/26/2022	10	Not Employed	Not Employed	Detroit	MI	5551 W Outer Dr	48235
DeLong, Suzanne	6/26/2022	25	Not Employed	Not Employed	Batavia	IL	968 Breton Ct	60510
Phillips, Kate	9/25/2022	10	Self-Employed	Massage Therapist	Parks	AZ	PO Box 50245	86018
Kruger, Joy	6/26/2022	10	Not Employed	Not Employed	Old Greenwich	CT	51 Forest Ave	6870
Georgiades, Austin	6/26/2022	7	Not Employed	Not Employed	Marlborough	CT	5 Denler Dr	6447
Fortier, Elizabeth	6/26/2022	7	Polk Co School Board	Teacher	Plant City	FL	4914 N Wilder Rd	33565
Robinson, Vivian	6/26/2022	10	Not Employed	Not Employed	San Antonio	TX	3103 Crosby Cv	78253
Long, Keith	9/25/2022	10	Not Employed	Not Employed	Denver	CO	9085 E Mississippi Ave Apt N107	80247
Gross, Sylvia	9/25/2022	3	Not Employed	Not Employed	Boca Raton	FL	3038 Lincoln B	33434
Shonert, Jeffrey H.	9/25/2022	2.5	Not Employed	Not Employed	New York	NY	30 Park Ter E Apt 2A	10034
Vostal, Judith	6/26/2022	10	Not Employed	Not Employed	Tinley Park	IL	7912 Trinity Cir Unit 25E	60487
Wingard, Steve	9/25/2022	25	Not Employed	Not Employed	Irwin	PA	117 Tanglewood Ct	15642
Lundgren, Judy	6/26/2022	25	Not Employed	Not Employed	Fort Worth	TX	1700 Sunset Ter Apt 18	76102
Wischan-Rosen, Patricia	9/25/2022	10	Not Employed	Not Employed	New York	NY	301 E 69th St # 16-E	10021
Vance, Jasmine	6/26/2022	10	Not Employed	Not Employed	Tucker	GA	2037 Weems Rd Apt 9201	30084
Giulini, Anthony	6/26/2022	15	Lu#164 Ibew	Union Electrician	Closter	NJ	28 Haring St	7624
Lesser, Cynthia	9/25/2022	10	Not Employed	Not Employed	Washington	DC	1100 6th St SW Apt 313	20024
Lesser, Cynthia	9/25/2022	10	Not Employed	Not Employed	Washington	DC	1100 6th St SW Apt 313	20024
Flores, Judith	6/26/2022	25	Self-Employed	Physician	Brooklyn	NY	257 Westminister Rd	11218
Adamiak, Kathryn	6/26/2022	25	Not Employed	Not Employed	Stuart	FL	6988 SE Harbor Cir	34996
Knauf, Rhonda	6/26/2022	25	Self-Employed	Designer	South Glastonbury	CT	651 Main St	6073
Knauf, Rhonda	6/26/2022	25	Self-Employed	Designer	South Glastonbury	CT	651 Main St	6073
Allen, David	6/26/2022	50	Not Employed	Not Employed	Alachua	FL	27030 NW County Road 239	32615
Patten Tiffany, Patty	6/26/2022	50	Not Employed	Not Employed	Key West	FL	PO Box 5448	33045
Parker, Tony	9/25/2022	4	Not Employed	Not Employed	Sacramento	CA	4141 Palm Ave Apt 506	95842
Price, Richard	6/26/2022	10	Not Employed	Not Employed	San Francisco	CA	755 Duncan St	94131
Hannah, Hanna	6/26/2022	7	Not Employed	Not Employed	Santa Cruz	CA	505 Swift St	95060
Yetter, Joyce	6/26/2022	7	Not Employed	Not Employed	Burnsville	MN	330 E Burnsville Pkwy Apt 211	55337
Ridge, Matthew	6/26/2022	8	Meadowbrook Insurance	Claims Processing Specialist	Marysville	OH	738 Keystone Way	43040
Woffington, Helen	6/26/2022	7	Not Employed	Not Employed	Rancho Cucamonga	CA	7720 Center Ave	91730
Cruser, Harlan	6/26/2022	7	Not Employed	Not Employed	Kelso	WA	104 Ponderosa Dr	98626
Brooks, Emily	9/25/2022	25	Anaplan	Principal Software Test Engineer	San Leandro	CA	479 Superior Ave	94577
Christie, Shana	6/26/2022	25	Geographic Expeditions	Adventure Travel	San Francisco	CA	490 Eureka St	94114
Paetro, Anthony	9/25/2022	5	Not Employed	Not Employed	Clearwater	FL	1559 Barry Rd	33756
Ritchie, Delene	9/25/2022	50	Not Employed	Not Employed	Bothell	WA	17516 Clover Rd	98012
Mansfield, Seymour	6/26/2022	12.5	Self-Employed	Attorney	Minneapolis	MN	2837 Sunset Blvd	55416
McDonald, Henry	6/26/2022	15	Not Employed	Not Employed	Lachine	MI	12223 Hibner Rd	49753
Fisher, Stephen	6/26/2022	10	Not Employed	Not Employed	Berkeley	CA	55 San Mateo Rd	94707
Wood, James	9/25/2022	38	Bureau Veritas	Administrator	Raleigh	NC	2000 University Woods Rd	27603
Chavez, Rosanna	9/25/2022	10	Self-Employed	Therapist	New York	NY	64 W 84th St Apt 18	10024
Leland, Valarie	6/26/2022	100	Thomson Reuters	Analyst	Carrollton	TX	2827 N Surrey Dr	75006
Hagen, Bradley	6/26/2022	25	Providence	Nurse Practitioner	Ashland	OR	289 Liberty St	97520
Abella, Armeen	6/26/2022	12	Not Employed	Not Employed	La Crescenta	CA	5010 Zoe Anne Way	91214
Yankie, Karen	6/26/2022	25	Not Employed	Not Employed	Albion	MI	104 Irwin Ave	49224
Davis, Christine	9/25/2022	12	Not Employed	Not Employed	Brighton	MI	7783 Brighton Rd	48116
Dehn, Janice	9/25/2022	50	Zifg Davis	Ecew Producer	Bradley Beach	NJ	611 Brinley Ave	7720
Patterson, Kay	6/26/2022	7	Not Employed	Not Employed	Goshen	IN	1504 Kingston Ct	46528
Keithley, Robin	6/26/2022	10	Not Employed	Not Employed	Omaha	NE	13712 Hickory Cir	68144
Keithley, Robin	6/26/2022	10	Not Employed	Not Employed	Omaha	NE	13712 Hickory Cir	68144
Cunningham, Judy	6/26/2022	50	Not Employed	Not Employed	Placerville	CA	3188 Highgrade St	95667
Cunningham, Judy	6/26/2022	50	Not Employed	Not Employed	Placerville	CA	3188 Highgrade St	95667
Strang, Arthur	6/26/2022	10	Not Employed	Not Employed	Cambridge	MA	60 Fresh Pond Pkwy	2138
Strang, Arthur	9/25/2022	10	Not Employed	Not Employed	Cambridge	MA	60 Fresh Pond Pkwy	2138
Myers, Paul	6/26/2022	50	Not Employed	Not Employed	Great Falls	VA	12004 Holly Crest Ct	22066
Ciancy, Mary	9/25/2022	5	St John's Health Center	Registered Nurse	Santa Monica	CA	1802 18th St Apt A	90404
McKee, Robbie	6/26/2022	10	Wichita State University	Professor	Lake Ozark	MO	220 Osage Hills Rd	65049
Marszalek, Marcia	6/26/2022	25	Not Employed	Not Employed	Tacoma	WA	6119 Madrona Dr NE	98422
Katz, Lawrence	6/26/2022	25	Not Employed	Not Employed	Ocean	NJ	14 Oak Tree Ln	7712
Conlan, Clara	6/26/2022	25	Not Employed	Not Employed	Grayland	WA	PO Box 602	98547
Clark-Elliott, Carol	6/26/2022	25	Not Employed	Not Employed	West Lafayette	IN	2508 W 600 N	47906
Kirkland, Frank M.	9/25/2022	100	CUNY--Hunter College	Professor	Briarwood	NY	8020 138th St Apt 2A	11435
Heaberg, Gall	6/26/2022	20	Not Employed	Not Employed	Bonaire	GA	102 Brittlend Dr	31005
Neal, Marvin	9/25/2022	125	Not Employed	Not Employed	Wauconda	IL	1224 Baldwin Ln	60084
Butler, Michael	6/26/2022	25	Self-Employed	It Consultant	Stellacoom	WA	702 2nd St	98388
Butler, Michael	9/25/2022	25	Self-Employed	It Consultant	Stellacoom	WA	702 2nd St	98388
Nevins, Vicki	6/26/2022	10	Self-Employed	Psychologist	Solana Beach	CA	325 S Sierra Ave	92075
Ramsey, Bernice	6/26/2022	3	Not Employed	Not Employed	Chelsea	MI	524 W Middle St	48118
Ramsey, Bernice	9/25/2022	3	Not Employed	Not Employed	Chelsea	MI	524 W Middle St	48118
Severin, Linda	6/26/2022	25	Whistleblower Law Collaborative LLC	Attorney	Newton Highlands	MA	PO Box 610196	2461
Severin, Linda	6/26/2022	25	Whistleblower Law Collaborative LLC	Attorney	Newton Highlands	MA	PO Box 610196	2461
Severin, Linda	9/25/2022	25	Whistleblower Law Collaborative LLC	Attorney	Newton Highlands	MA	PO Box 610196	2461
Severin, Linda	9/25/2022	25	Whistleblower Law Collaborative LLC	Attorney	Newton Highlands	MA	PO Box 610196	2461
Mercier, Richard	6/26/2022	25	Not Employed	Not Employed	Leesburg	VA	5 Stationmaster St SE Apt 302	20175
Mercier, Richard	6/26/2022	25	Not Employed	Not Employed	Leesburg	VA	5 Stationmaster St SE Apt 302	20175

McDaniel, Jayna	6/26/2022	25	Delaware City Schools	Board of Education Member	Delaware	OH	189 Hawthorn Blvd	43015
Barnes, Dennis	6/26/2022	100	Not Employed	Not Employed	Chicago	IL	9157 S Blackstone Ave	60619
Hudson, Lisa	6/26/2022	10	Not Employed	Not Employed	Snellville	GA	1722 Pharrs Rd	30078
Rowlett, John	6/26/2022	75	Field Guides Incorporated	Bird Tour Guide; Editor	Charlottesville	VA	1270 River Chase Ln	22901
York, Marvin	9/25/2022	25	Self-Employed	Truck Driver	Portland	OR	10350 N Vancouver Way # 100	97217
Bradford, James	6/26/2022	50	Not Employed	Not Employed	Royal Oak	MI	127 Maxwell Ave	48067
Maloney, Barbara	6/26/2022	50	Not Employed	Not Employed	La Mesa	CA	3910 Denver Dr	91941
Rawls, Richard	6/26/2022	10	Not Employed	Not Employed	Viroqua	WI	E2932 Newton Rd	54665
Flete, Robert	9/25/2022	25	Not Employed	Not Employed	Wadsworth	OH	697 Silvercrest Dr	44281
Gildin, Marsha	6/26/2022	100	Girl Be Heard	Teaching Artist	New York	NY	66 Overlook Ter Apt 5N	10040
Dunfrund, Sharon	9/25/2022	25	Not Employed	Not Employed	Alexandria	VA	6481 Unleigh Way	22315
Lyne, David	6/26/2022	10	Not Employed	Not Employed	Stanwood	WA	825 300th St NE	98292
Smith, Susan	6/26/2022	25	Not Employed	Not Employed	Denver	CO	5886 Alton St	80238
Bains, Yashpal	6/26/2022	100	Altran Bordentowntown NJ	Engineer	Bensalem	PA	1036 Essex Dr	19020
Campbell, Barbara	9/25/2022	5	Not Employed	Not Employed	Aurora	CO	1923 Biscay St	80011
Towne, Courtney	6/26/2022	25	Triple P America	Implementation Consultant	Vancouver	WA	10015 NW 17th Ave	98685
Quattrone, Louise	6/26/2022	12	Not Employed	Not Employed	Philadelphia	PA	1901 John F Kennedy Blvd Apt 1801	19103
Mangravitte, Theresa	6/26/2022	25	Not Employed	Not Employed	Morris Plains	NJ	35 Janeway Pl	7950
Wainscott, James	6/26/2022	10	Not Employed	Not Employed	Placerville	CA	3439 Fort Jim Rd	95667
Shea, Joanne	6/26/2022	10	Not Employed	Not Employed	Linwood	PA	1419 Brookside Ave	19061
Durkee, David	6/26/2022	10	USPS	Deliver Driver	Wells River	VT	74 Main St N	5081
Dole, Donna	6/26/2022	12	Not Employed	Not Employed	Caldwell	ID	PO Box 901	83606
Bensusen, K.	9/25/2022	10	Not Employed	Not Employed	El Prado	NM	11 Reyna Rd	87529
Cardinale, Daniel	9/25/2022	10	Umassmedical Center	Registered Nurse	Shrewsbury	MA	1 Gates Rd	1545
Durst, Daniel O.	6/26/2022	4	Retired	Retired	Farmington Hills	MI	30070 W 12 Mile Rd Unit 121	48334
Durst, Daniel O.	6/26/2022	4	Retired	Retired	Farmington Hills	MI	30070 W 12 Mile Rd Unit 121	48334
Fahey, Joyce	6/26/2022	10	Retired	Retired	Moorestville	NC	136 Claire Ln Apt 103	28117
Knight, Frank	6/26/2022	7	Not Employed	Not Employed	Pleasantville	NY	72 Columbus Ave	10570
Richard, Huey	9/25/2022	10	Not Employed	Not Employed	Thibodaux	LA	282 Crossing North St	70301
Haglund, Sherron	9/25/2022	10	Not Employed	Not Employed	San Antonio	TX	5704 Gomer Pyle	78240
Wilkins, James	9/25/2022	2	Not Employed	Not Employed	Converse	TX	9815 Meadow Way	78109
Shay, Kathryn	6/26/2022	10	Not Employed	Not Employed	Vancouver	WA	10306 NE 88th St	98662
Shay, Kathryn	6/26/2022	5	Not Employed	Not Employed	Vancouver	WA	10306 NE 88th St	98662
Swanson, Marleen	6/26/2022	5	Not Employed	Not Employed	Denver	CO	5062 Perth St	80249
Fedyna, Francesca	6/26/2022	7	Not Employed	Not Employed	Flemington	NJ	33 Sullivan Rd	8822
Demby, Stephen	9/25/2022	5	Pequothealthcare	IT	Norwich	CT	182 Sheraton Ln	6360
Brett-Smith, Helena	6/26/2022	10	Trevi Therapeutics	Research Physician	New Haven	CT	8 Reservoir St	6511
Ritger, Mary Beth	9/25/2022	2.5	Self-Employed	Attorney	New York	NY	61 W 62nd St Apt 20L	10023
Bennett, Sarah	6/26/2022	10	Not Employed	Not Employed	Crestone	CO	PO Box 607	81131
Maloney, Elizabeth	6/26/2022	10	Not Employed	Not Employed	Des Plaines	IL	1365 Ashland Ave	60016
Pauly, Marcia	9/25/2022	5	Not Employed	Not Employed	Stone Mountain	GA	4035 Flintridge Dr	30083
Pauly, Marcia	9/25/2022	4	Not Employed	Not Employed	Stone Mountain	GA	4035 Flintridge Dr	30083
Alcorn, James	9/25/2022	25	Self-Employed	Architect	La Jolla	CA	9736 Claiborne Sq	92037
Biernere, Rebecca	6/26/2022	25	Not Employed	Not Employed	Ballwin	MO	301 Clovis Dr	63011
Smith, Steve	6/26/2022	7	Self-Employed	Teacher	Shoreline	WA	29252 WALLINGFORD Ave N	98133
Haynes, Patrick	9/25/2022	7	Not Employed	Not Employed	Dallas	TX	4041 Mendenhall Dr	75244
Hernandez, Gilbert	6/26/2022	5	Not Employed	Not Employed	San Antonio	TX	6427 Wurzbach Rd Apt 13	78240
Ross, Loren	6/26/2022	25	Not Employed	Not Employed	New York	NY	333 E 30th St Apt 20M	10016
Ames, Lynn	9/25/2022	4	Not Employed	Not Employed	Milwaukee	WI	1220 S 52nd St	53214
Crawl, Bettie	9/25/2022	4	Not Employed	Not Employed	Bowie	MD	4905 Forest Creek Ct	20720
McHale, Jt	9/25/2022	7	Not Employed	Not Employed	Melbourne	FL	2260 Front St Apt 103	32901
Harris, Karen	6/26/2022	25	Swedish Medical Center -Seattle	Registered Nurse	Mukilteo	WA	12924 50th Pl W	98275
Harris, Karen	9/25/2022	25	Swedish Medical Center -Seattle	Registered Nurse	Mukilteo	WA	12924 50th Pl W	98275
Horak, Robert	6/26/2022	10	Self-Employed	Attorney	Johnston	IA	6042 Sheffield Cir	50131
Horak, Robert	6/26/2022	10	Self-Employed	Attorney	Johnston	IA	6042 Sheffield Cir	50131
Levy, Lorell	6/26/2022	10	West Windsor-Plainsboro School District	Educator	Trenton	NJ	5 Belmont Cir	8618
Gillens, Lucy	6/26/2022	10	Not Employed	Not Employed	Chesapeake	VA	208 Dunwich Rd # B	23325
Thompson, Paul	9/25/2022	7	CDE	Education Programs Consultant	Sacramento	CA	6761 Freehaven Dr	95831
Thompson, Paul	9/25/2022	7	CDE	Education Programs Consultant	Sacramento	CA	6761 Freehaven Dr	95831
Acord, Danell	6/26/2022	10	Not Employed	Not Employed	Roseburg	OR	982 Doerner Rd	97471
Murphy, Mark	6/26/2022	10	USG	Analyst	Jamestown	NC	306 Jordan Ridge Way	27282
Murphy, Mark	9/25/2022	10	USG	Analyst	Jamestown	NC	306 Jordan Ridge Way	27282
Guenther, Marilyn	6/26/2022	10	Not Employed	Not Employed	Rochester	NY	406 Upper Valley Rd	14624
Guenther, Marilyn	9/25/2022	10	Not Employed	Not Employed	Rochester	NY	406 Upper Valley Rd	14624
Wilson, Martha	9/25/2022	25	NASW	Comms	Washington	DC	1916 17th St NW Apt 305	20009
Okimoto, Jennifer	6/26/2022	10	Hawaii	Desktop Specialist	Hilo	HI	708 Kaulele Pl	96720
Zeman, Frank	9/25/2022	10	Not Employed	Not Employed	Naples	FL	364 Tern Dr Apt 3	34112
Walker, Martha	6/26/2022	10	Personal Care	Cna	Mcdonough	GA	100 Ashley Oaks Dr	30253
Walker, Martha	9/25/2022	10	Personal Care	Cna	Mcdonough	GA	100 Ashley Oaks Dr	30253
Gray, Sandra	6/26/2022	7	Self-Employed	Property Manager	Debarry	FL	263 Bayou Cir	32713
Bodnar, Michael	6/26/2022	10	Portauthorityof Allegheny County	Building Maintainer	Carnegie	PA	348 Reamer Ave	15106
Petersen, Lynn	6/26/2022	50	Not Employed	Not Employed	Tustin	CA	2252 Caper Tree Dr	92780
Ostranderrand, Karin	6/26/2022	25	Self-Employed	Therapist	Burlington	MA	31 Sandy Brook Rd	1803
Harmon, Ellen	6/26/2022	7	Not Employed	Not Employed	Oklahoma City	OK	1209 NW 36th St	73118
Gregory, Janey	6/26/2022	2	Not Employed	Not Employed	Sparta	TN	172 Petty Rd	38583
Wilkins, Margaret	6/26/2022	2.5	Self-Employed	Tutor	Seattle	WA	2687 SW Sylvan Heights Dr	98106
Wilkins, Margaret	9/25/2022	2.5	Self-Employed	Tutor	Seattle	WA	2687 SW Sylvan Heights Dr	98106
Dillard, Christi	6/26/2022	5	Not Employed	Not Employed	Fort Davis	TX	101 N Front St	79734
Dillard, Christi	6/26/2022	5	Not Employed	Not Employed	Fort Davis	TX	101 N Front St	79734
Dillard, Christi	9/25/2022	5	Not Employed	Not Employed	Fort Davis	TX	101 N Front St	79734
Dillard, Christi	9/25/2022	5	Not Employed	Not Employed	Fort Davis	TX	101 N Front St	79734
Whitis, Jondalyn	6/26/2022	7	Self-Employed	Trainer	Brooklyn	NY	341 10th St	11215
Garcia, Ruth K.	9/25/2022	5	Retired	Retired	Kent	WA	25805 34th Ave S	98032

EXHIBIT B
DECLARATIONS

**STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES**

RE: American Leadership Committee – Maine

DECLARATION OF HEATHER KASHNER

1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein.
2. I am the Chief Operating Officer of the Democratic Legislative Campaign Committee (“DLCC”). In that capacity, I oversee the DLCC’s campaign finance compliance operation.
3. The DLCC has made four contributions to ALC-ME to finance ALC-ME’s independent expenditure contributions:
 - a. \$125,000 on October 3, 2022
 - b. \$5,448.44 on October 12, 2022
 - c. \$9,513.47 on October 17, 2022
 - d. \$125,000 on October 20, 2022.
 - e. \$3,835.36 on October 21, 2022.
4. These contributions were transferred from the DLCC’s Low Individual Account, a separate bank account into which small-dollar contributions from individuals are deposited. Donors who contribute up to \$4,999.99 in a calendar year are eligible to have their funds deposited in the Low Individual Account.
5. Because DLCC contributes to reporting entities in multiple jurisdictions from the Low Individual Account, DLCC tracks in which state a donor’s contributions are spent. Once marked

as spent in a particular state, that donor's contribution is no longer eligible to be spent in any other state.

6. For example, a \$1,000 contribution from Deborah J. Simon on September 15, 2022, a \$500 contribution from Jerry Rosenstock on September 15, 2022, and a \$500 contribution from Chris Sasso on October 18, 2022 have all been designated as spent in New Hampshire and were not eligible to be part of any of the transfers identified in Paragraph 3.

7. Exhibit A is a list of donors whose contributions were in the Low Individual Account at the time of the transfers identified in Paragraph 3 and had not been designated as spent in any state. They each gave less than \$1,000 to the DLCC since November 4, 2020. They have since been marked as spent in Maine and are not eligible for use in any other state.

I declare under penalty of perjury under the laws of the State of Maine that the foregoing is true and correct.

Executed on: 10/24/2022
Date

Heather Kashner
Heather Kashner

STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES

RE: American Leadership Committee – Maine


DECLARATION OF CORY WARFIELD

1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein.
2. I am the Independent Expenditure Director for the Democratic Legislative Campaign Committee (“DLCC”).
3. In my capacity as Independent Expenditure Director, I oversee the expenditures of American Leadership Committee (“ALC”), the independent expenditure arm of the DLCC.
4. As Independent Expenditure Director, I am aware of ALC’s independent expenditure process and mail programming decisions.
5. Many factors impact ALC’s mail programming decisions, including available budget for postage, timing in the election cycle, polling data, and revenue fluctuations.
6. Sometimes, for any of the above reasons, ALC will hire a vendor to develop mail concepts but will elect not to print those concepts.
7. Additionally, for the same reasons, ALC may take advantage of bulk printing discounts to print mailers for a group of candidates but may choose to send mailers for a select few from that group.
8. This is not an extraordinary occurrence. For example, in late August of this year, ALC had designed with Moxie Media four mail pieces regarding elections in a state other than Maine. Two were sent to the printer and mailed, and ALC canceled or delayed the last two pieces.

Now, in October, ALC is using the delayed design from that mail program, which will be mailed in that state in late October. The portion of that August design fee will be included in ALC's October invoice from Moxie Media.

I declare under penalty of perjury under the laws of the State of Maine that the foregoing is true and correct.

Executed on: 10/24/2022
Date


Cory Warfield

STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES

RE: American Leadership Committee – Maine

DECLARATION OF BRIAN ZUZENAK

1. I am over eighteen years of age. I have personal knowledge of the facts set forth herein.
2. I am a Partner with Moxie Media. Moxie Media produces political direct mail and supervises the printing and postage of such mail through sub-vendors.
3. In my capacity as Partner, I observe the mail programming decisions of our clients.
4. Sometimes, a client will engage our services at Moxie Media to design political mailers but will choose not to print those mailers.
5. Sometimes, a client will engage our services at Moxie Media to develop and print political mailers but will choose not to pay for postage for those mailers.
6. While this happens rarely, it is also not an extraordinary occurrence. Clients cutting mail programs is more likely to occur later in the election cycle, in late August through October, and may be the result of revenues falling short of projections or political strategy changing.

I declare under penalty of perjury under the laws of the State of Maine that the foregoing is true and correct.

Executed on: 10/24/2022
Date

Brian Zuzenak
Brian Zuzenak

Kim E. Pettengill
171 Northern Avenue
Farmingdale, Maine 04344
207.907.8205 kimepettengill@gmail.com

October 24, 2022

Jonathan Wayne, Executive Director
Maine Ethics Commission
135 State House Station
Augusta, Maine 04333-0135

Dear Jonathan -

I am filing a complaint against American Leadership Committee - Maine, 1125 I St., Suite 1250, Washington, DC regarding mailings sent in opposition regarding the following Republican candidates:

Jon Connor (District 9) - 2 mailings
Jennifer Marie Morin (District 20) - 1 mailing
Reagan LeeAnn Paul (District 37) - 1 mailing
Crystal Lynn Robinson (District 44) - 1 mailing
Tricia Warren (District 48) - 1 mailing
Kelly James (District 49) - 1 mailing
Linda L. Baker (District 51) - 2 mailings
Charles J. Bussell (District 54) - 2 mailings
Philip Ryan Wiseman (District 55) - 1 mailing
Corey Wilson (District 57) - 1 mailing
James E. Orr (District 59) - 2 mailings
William L. Clardy (District 60) - 1 mailing
Tiffany Estabrook (District 75) - 2 mailings
Gregory E. Foster (District 86) - 1 mailing
James William Sorcek (District 88) - 2 mailings
John Victor Chambers (District 96) - 2 mailings
David Lawrence Reed (District 105) - 1 mailing
Barbara Bagshaw (District 106) - 1 mailing
Michael Hall (District 107) - 1 mailing
Pamela Diane Buck (District 142) - 2 mailings
AnnMarie Fredericks (District 143) - 2 mailings
Timothy M. Roche (District 145) - 1 mailing
Mark Andrew Rouillard (District 149) - 2 mailings

They have sent opposition mailings regarding the Republican House candidates listed above stating that they do not have a top donor. Records on your website show that

Jonathan Wayne, Executive Director
October 24, 2022
Page 2

they have recorded expenditures on 10/12/2022 and 10/19/2022 in the total amount of \$56,661.91.

According to their finance report covering 8/23 through 9/30/2022, the largest donor to this organization is the Democratic Legislative Campaign Committee, 1125 I St., Suite 1250, Washington, DC, which has donated \$56,400.00 to the American Leadership Committee - Maine.

This is a clear violation of the state's top 3 funders rule, which requires a PAC to list the top 3 funders of their organization of at least \$1,000.

The lack of disclosure of the Democratic Legislative Campaign Committee's full involvement and support in these mailers denies voters the knowledge of the partisan intent of the message.

I respectfully request that this complaint be reviewed and acted upon as quickly as possible. Organizations such as the American Leadership Committee - Maine must be held accountable so that the citizens of Maine are informed as to who is actually funding these false statements against those who are willing to run for public office.

Sincerely,



Kim E. Pettengill

**"Abortion rights in
Maine could be at risk
if Republicans reclaim
the state government"**

10 D 1 5/16/22



**"MAINE REPUBLICAN
PARTY ADOPTS PLATFORM
AGAINST ABORTION"**

WABI 5 4/30/22

**"LePage has long
history of opposing
abortion rights"**

BEACON 5/29/22



**MAINE REPUBLICANS
WOULD TAKE AWAY
OUR RIGHTS**

WE CAN'T TRUST REPUBLICAN CHARLES BUSSELL



Now more than ever, we need a Representative who will defend our rights. But **Charles Bussell** is backed by dangerous extremists who want to limit access to abortion, even here in Maine and could become the deciding vote to ban abortion in our state. ¹

No matter how we feel about abortion personally, politicians should not be able to control people's private medical decisions.

Keep Charles Bussell OUT
of our State Legislature.

VOTE BY NOVEMBER 8

Part of by American Leadership Committee - Maine, 125 US NW Ste 1250, Washington, DC 20005. NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE. No top donors.

**"Abortion rights in
Maine could be at risk
if Republicans reclaim
the state government"**

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**"MAINE REPUBLICAN
PARTY ADOPTS PLATFORM
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BEACON 5/29/22



**MAINE REPUBLICANS
WOULD TAKE AWAY
OUR RIGHTS**

WE CAN'T TRUST REPUBLICAN LINDA BAKER



PAID FOR BY AMERICAN
LEADERSHIP COMMITTEE -
MAINE, 1225 I ST NW
STE 1250, WASHINGTON, DC
20005. NOT PAID FOR
OR AUTHORIZED BY
ANY CANDIDATE.
No top donors.

Now more than ever, we need a Representative who will defend our rights. But **Linda Baker** is backed by dangerous extremists who want to limit access to abortion, even here in Maine and could become the deciding vote to ban abortion in our state.¹




No matter how we feel about abortion personally, politicians should not be able to control people's private medical decisions.

Keep Linda Baker OUT
of our State Legislature.

VOTE BY NOVEMBER 8

1. CURE THE FACTS: Maine Republican Party Platform, accessed 11/20/22



POLITICIANS WOULD BAN ABORTION WITH NO EXCEPTIONS IN MAINE

**“Abortion rights in
Maine could be at risk
if Republicans reclaim
the state government”**

npr 5/16/22

**“MAINE REPUBLICAN
PARTY ADOPTS PLATFORM
AGAINST ABORTION”**

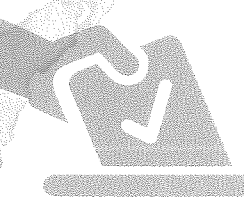
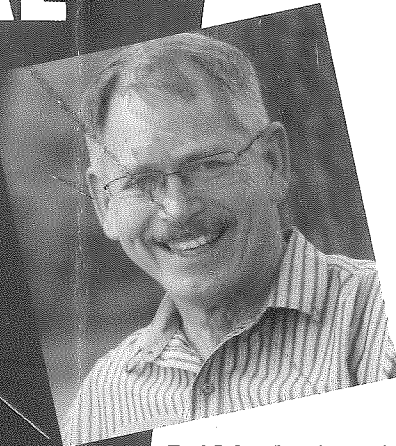
WABI 5 4/30/22

**“LePage has long
history of opposing
abortion rights”**

BEACON 6/29/22

DON'T LET REPUBLICANS LIKE WILLIAM CLARDY INTERFERE IN PRIVATE MEDICAL DECISIONS

Maine women and families have a right to make personal, private medical decisions, but **William Clardy** is backed by dangerous extremists who want to limit access to abortion, even here in Maine and could become the deciding vote to ban abortion in our state.



VOTE
BY NOVEMBER 8
TO PROTECT
ABORTION FROM
POLITICIANS
LIKE WILLIAM
CLARDY.

Paid for by American Leadership Committee - Maine,
1225 I St NW Ste 1250, Washington, DC 20005.
NOT PAID FOR OR AUTHORIZED BY ANY
CANDIDATE.
No top donors.

 6618

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STANDARD MODERN
COMPANY