



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

To: Commissioners  
From: Michael Dunn, Esq., Committee Registrar  
Date: November 10, 2020  
Re: Proposed Plans to Audit 2020 Leadership PACs

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This memo describes proposed procedures for auditing leadership PACs that were registered with the Commission in 2020. This idea originated with members of the Commission in 2017 after the investigation of the Respect Maine PAC and news coverage of leadership PACs. The staff did not audit leadership PACs in 2018 due to an extended budget crisis relating to Commission's authority to pay Maine Clean Election Act funds to candidates (ultimately resolved in August 2018 through litigation) and the introduction of a new electronic filing system in July 2018 that occupied far more staff time than was anticipated.

### **Genesis of Project**

On August 30, 2017, the Commission staff reported back to the Commission concerning an investigation of State Senator Andre Cushing's 2016 campaign and his leadership PAC, Respect Maine. A complaint had been filed by Sen. Cushing's sister alleging that he had used funds from Respect Maine to support a family business, and the PAC had not disclosed this activity in campaign finance reports. The allegation was verified by the staff's investigation. The Commission found that ten of the PAC's reports should be considered late because they did not substantially conform to the disclosure requirements and assessed a \$7,500 penalty for the late PAC reports. The Respect Maine investigation, along with press reports concerning two other leadership PACs that arguably were used by Legislators for self-serving purposes, prompted Commissioner William Lee to suggest an audit of financial activity by leadership PACs.

The Commissioner members discussed the procedures for the audits at their next two meetings on September 28 and November 30, 2017, including the need to provide advance notice to leadership PACs that they might be audited and the potential for negative reaction of Legislators. For your reference, the materials attached to this memo contain excerpts from the minutes for those meetings.

In 2019, the Commission staff discussed plans to audit 2020 leadership PACs with the Commissioners, and discussed a proposed letter notifying the PACs of the new audit program. The staff sent the mailing on October 9, 2020.

### **Statutory Authority to Conduct Audits**

The proposed audit of 2020 leadership PACs would be conducted pursuant to two provisions:

- Title 21-A, § 1003(1): “The commission may undertake audits and investigations to determine whether a person has violated this chapter [*i.e.*, the campaign finance reporting laws], chapter 14 [the Maine Clean Election Act], and the rules of the commission.
- Title 1, § 1008(2): “The general duties of the commission shall be: ... [t]o administer and investigate any violations of those requirements of campaign reports and campaign financing, including the provisions of the Maine Clean Election Act and the Maine Clean Election Fund ....

Currently, the Commission staff conducts compliance reviews of all campaign finance reports filed by PACs and BQCs. This review is administered by Michael Dunn, Esq. and Lorrie Brann. The staff reviews the reports to make sure that each report appears complete and accurate on its face, and that all required details appear in the report. The staff follows up as necessary. The only audits conducted by the Commission are those of Maine Clean Election Act candidates.

## **Selection of PACs to be Audited**

The term, leadership PAC, is not defined in Maine Election Law.<sup>1</sup> For purposes of this audit program, the Commission is defining leadership PAC to mean:

- a PAC registered in 2020
- The Legislator is a principal officer or treasurer of the PAC, or one of the people primarily responsible for making decisions for the PAC.

Twenty-eight PACs are within this category. They are listed in a chart among the attached materials, along with the associated Legislator.

## 2020 PACs Proposed for Exclusion

The Commission staff proposes to exclude the following PACs from the audit:

- *PACs that terminated in early 2020.* The Go Maine PAC, Hickman Cultivating Leadership PAC, and Priorities for Coastal Maine PAC, all terminated early<sup>2</sup> in 2020, and had negligible activity. For these reasons, staff recommends removing these three committees from the list.
- *Low activity PACs (\$5,000 or less in activity).* The Commission staff recommends that the review focus on committees with higher financial activity. Staff has generally viewed “high activity committees” as committees that receive or spend more than \$5,000 in a year<sup>3</sup>.
- *Three-legislator PAC.* Staff also recommends that the We the People PAC be excluded from the audited PACs because three of the officers are current legislators. We are unsure whether this PAC meets the colloquial understanding of leadership PAC and the risk of inaccurate reporting may be lower.

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<sup>1</sup> At your December 18, 2020 meeting, the Commission will propose a statutory definition for “leadership PAC” as part of a proposed agency bill.

<sup>2</sup> The Hickman Cultivating Leadership and Priorities for Coastal Maine both terminated at the time of filing the April Quarterly campaign finance report, and the Go Maine PAC terminated at the 11-Day Pre-Primary Report.

<sup>3</sup> The Commission staff is happy to adjust this threshold as the Commission sees fit.

### PACs Proposed for Audit

After those PACs are excluded, the Commission staff proposes auditing all of the remaining 15 committees. They are led by seven Democratic members of the 129<sup>th</sup> Legislature and eight Republican members.

<b>Committees (and Associated Legislators)</b>	<b>2020 Contributions</b>	<b>2020 Expenditures</b>
Aroostook PAC (John Martin)	\$6,400.00	\$2,686.00
Charlotte PAC (Charlotte Warren)	\$4,745.00	\$10,733.23
Committee for Peace and Justice (Michael Brennan)	\$8,755.00	\$4,755.19
Fecteau for Leadership (Ryan Fecteau)	\$31,876.00	\$46,557.56
Libby Leadership PAC (Nathan Libby)	\$23,750.00	\$15,283.90
Maine First PAC (Lawrence Lockman)	\$3,600.00	\$7,757.01
Maine Opportunity PAC (Andrew Gattine)	\$500.00	\$18,152.59
One Maine (Kathleen Dillingham)	\$55,428.00	\$30,468.71
PAC to the Future (Matt Moonen)	\$12,505.00	\$23,643.13
Prosperity for Maine's Future (Matthew Pouliot)	\$58,515.00	\$138,182.45
Revive Home Town Maine PAC (Joel Stetkis)	\$25,050.00	\$22,275.76
Shiretown PAC (Gregg Swallow)	\$5,789.00	\$4,932.67
Star City PAC (Trey Stewart)	\$10,450.00	\$28,589.66
Still Fed Up with Taxes (Jeffrey Timberlake)	\$92,063.20	\$136,585.77
Sunshine Hill (Stacey Guerin)	\$24,000.00	\$27,720.99

### **Proposed Audit Procedures**

Once the Commission has approved the procedures for selecting PACs to be audited, the staff will begin alerting the committees that they have been selected for review and will request documents related to financial activity during 2020. The staff would anticipate sending a document request no later than the second week of December. The request would be for bank statements and receipts/invoices for expenditures in excess of \$50.<sup>4</sup> The deadline for submission would be the end of January, in order to give the committees sufficient time to provide us bank statements through December 31, 2020.

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<sup>4</sup> PACs are required to keep these records for four years by 21-A M.R.S. § 1057.

The staff will begin comparing the actual financial activity of the PACs as reflected in their financial records to their reported transactions. We will be verifying:

- the leadership PACs have accurately and completely disclosed their financial transactions, with all detail required by Maine Election Law
- whether all required records were maintained,
- the PACs have not transgressed the limited self-enrichment prohibitions in 21-A M.R.S. § 1054-A,
- any other violations (e.g., independent expenditure reporting).

Currently, Commission management plans for most of the examination to be conducted by Michael Dunn and Lorrie Brann. The audit will be supervised by Jonathan Wayne. The Commission staff plans to seek feedback and design suggestions from the accounting firm engaged to audit 2020 Maine Clean Election Act candidates. The audits will be conducted concurrently.

The staff would produce an individualized audit reports for each PAC audited, similar to the reports the Commission has received as part of the audit program for Maine Clean Election Act candidates. Significant findings will be listed in detail in each report such as: omitted or duplicate transactions, failure to itemized contributions, prohibited payments, misuse of funds for personal enrichment in violation of § 1054-A, failure to keep records, minor errors that in the aggregate rise to a significant finding, failure to reasonably participate or respond to Commission staff's inquiries, or other similar errors.

We will seek feedback from our contract auditors concerning how to note any minor findings or exceptions in the audit report in a way that is efficient for staff and Commission members. Minor errors would include: transposed numbers, incomplete information (address, employment information), support/oppose expenditures with incorrect election years, support/oppose expenditures listed as operating expenditures, incorrect expenditure codes, vague descriptions, or other similar errors.

In addition to findings and violations, we plan to note internally other potentially self-enriching activity not in violation of § 1054-A that might inform future statutory or rule proposals.

The Commission staff believes that the audit program will be completed by mid-April 2021, but that is subject to other priorities and staffing issues. We will keep you informed about any delays.

Thank you for your consideration of this memo.

# Leadership PAC Audit Discussions

Taken from the Maine Ethics Commission Approved Minutes

## **1. August 30, 2017 Commission Meeting Minutes (Approved September 28, 2017)**

*Late-Filing Penalties – Respect Maine PAC and the Honorable Andre Cushing.* Mr. Wayne said Laura McIntyre, Senator Cushing’s sister, filed a request for investigation due to her concerns regarding certain financial transactions related to the Cushing Family Corporation and Senator Cushing’s candidate committee and political action committee. The Commission authorized the staff to investigate on October 26, 2016. He said the Commission staff had reviewed three years of financial records for Senator Cushing’s Senate campaign account and his political action committee, Respect Maine. He said the Commission staff found 10 PAC reports to be substantially non-conforming due to unreported expenditures, transfers of PAC funds to a private business, and a general lack of detail about the reported transactions as required by law. Mr. Wayne said Senator Cushing has been very cooperative throughout this process. He said the preliminary penalties are quite high and the Commission staff was recommending a reduction in the penalty to something in the range of \$11,000 - \$16,000. Mr. Lee asked about the Commission staff’s reasoning for the penalty reduction. Mr. Wayne said the overall amount reflects the seriousness of the violations. He said even the reduced penalty is a significant penalty amount for the Commission to impose. He said the majority of Sen. Cushing’s candidate campaign reports were substantially conforming.

Joshua Tardy, Esq., and Senator Cushing appeared before the Commission. In response to a question from Mr. Lee about the sources of the PAC’s contributions, Mr. Tardy said it is the nature of PAC contributions to be a mix of individual and corporate donations. Mr. Nass noted that the issue in this case was not with contributions but only with expenditures. Mr. Tardy agreed. Ms. Matheson said there were a large number of unreported transactions that were unrelated to campaign activity, which helped her understand the staff’s recommendation on a penalty. Mr. Tardy said none of the unreported activity affected any campaign and did not deprive the public of information related to an election. Mr. Tardy said Respect Maine is a very active PAC and it will be a lengthy process to correct the errors. Mr. Tardy said he appreciated the Commission staff’s recommendation and felt the staff had done a good job with its report,

but he disagreed with the proposed penalty. He suggested that a \$5,000 penalty would have sent a significant message without having as serious a personal impact on Senator Cushing and his family.

Mr. Lee asked why Senator Cushing had not amended his reports when the Commission staff pointed out the errors. Senator Cushing said that his counsel in the civil matter had advised him not to amend the reports at that time and to wait until the Commission's investigation was complete. Mr. Lee observed that \$40,080 was given to New England Forest Products (NEFP) but only \$38,600 was returned to the PAC. Mr. Lee asked why all the money given to NEFP had not been returned. Mr. Tardy said the intent was for all the money to be returned. Mr. Lee asked if the non-return of funds was because of a bookkeeping error. Senator Cushing said difficulties with his bookkeeping services had resulted in a lack of access to financial records. Mr. Lee asked if there are any loan documents related to the transfer of funds from the PAC to NEFP. Senator Cushing and Mr. Tardy said there are not. Mr. Lee asked about a check from Andre Cushing IV to Senator Cushing. Senator Cushing said that was a short-term loan from his son to NEFP. Mr. Lee asked if it had been repaid. Senator Cushing said it had. Senator Cushing said he was a 50% owner in NEFP, which was a subsidiary business of the Cushing Family Corporation.

Mr. Pattershall asked if Senator Cushing had filed all reports this year. Mr. Wayne said he has. Mr. Pattershall asked if there are any problems with the reports. Mr. Wayne said that, as far as he knows, there are not. Mr. Pattershall asked if there were more loans to NEFP. Senator Cushing said he sold NEFP in 2015. Senator Cushing said the primary focus of this investigation has been on the PAC's financial activity. He said many PACs are dormant in the off-election years, but because he is involved in a variety of national organizations, his PAC is more active.

Ms. Lowry said many of Senator Cushing's transaction descriptions were so vague they bordered on being meaningless. Ms. Matheson said the deficiencies are significant enough to consider the reports late. She said she would be comfortable with a \$13,500 penalty. Mr. Lee suggested separating the PAC penalties from the candidate penalties. Ms. Gardiner recommended that it would be better procedurally to have a separate motion for each entity. Mr. Lee made a motion to reduce the statutorily calculated penalty for the 10 violations by the Respect Maine PAC to \$750 per violation and, for the Cushing for Senate campaign, to reduce the statutorily calculated penalty of \$5,000 to \$2,500, which reduces the total statutory penalty of \$105,000 to \$10,000.



Ms. Lowry seconded the motion. Mr. Lee subsequently withdrew his motion to deal with the two reporting entities separately. Ms. Gardiner pointed out that it would be better if the Commissioners split this into two motions because there are two entities with separate reporting obligations involved in this case.

Mr. Pattershall made a motion to reduce the statutory penalty of \$100,000 for Respect Maine PAC to \$5,000, which is \$500 per report. Mr. Nass seconded the motion. Motion failed (2-3; Ms. Matheson, Mr. Lee, and Ms. Lowry opposed). Ms. Matheson made a motion, with respect to the late-filed PAC reports, to reduce the statutory penalty of \$100,000 to \$7,500, which is \$750 per report. Mr. Lee seconded the motion. Motion passed (3-2; Mr. Nass and Mr. Pattershall opposed). Mr. Lee made a motion that the statutorily calculated penalty of \$5,000 for the 2016 late-filing violation of Cushing for Senate campaign be reduced to \$1,500. Ms. Matheson seconded the motion. Motion passed (3-2; Mr. Nass and Mr. Pattershall opposed).

## **2. September 28, 2017 Commission Meeting Minutes (Approved November 30, 2020)**

*Discussion of Leadership PACs/Spending Restrictions.* Mr. Wayne explained that this agenda started with a request from Mr. Lee for the staff to research the possibility of initiating an audit program for leadership PACs. In addition to the recent matter regarding Senator André Cushing's leadership PAC, there have been other instances where Legislators used their PAC funds in ways that appeared to be self-enriching. He said the staff memo points out the lack of legal restrictions on how PAC funds may be used and how the staff currently conducts compliance reviews of PAC reports.

Mr. Lee said the matter of Senator Cushing's leadership PAC only came to light because of a complaint against Senator Cushing filed by a family member with this Commission and litigation involving a family business. He said that most people would expect that the money given to an elected official with a leadership PAC will be used for political or official purposes, and not for personal reasons. Since the Commission already has the statutory authority to conduct audits, he suggested that the Commission consider the possibility of engaging in a process of random audits of leadership PACs, like the audit program for Maine Clean Election Act candidates. Ms. Lowry agreed with Mr. Lee's suggestion to initiate a program to conduct some random audits of

leadership PACs. She said the results could be important in informing the Commission's decision making in the future. Mr. Nass also agreed with Mr. Lee's suggestion to conduct random audits of leadership PACs. However, he cautioned the Commissioners of the potential for a negative reception from Legislators.

Mr. Pattershall said the statute authorizes the Commission to investigate in order to determine whether there is a violation of campaign finance law. Since there are no restrictions on how PACs may spend their money, he questioned whether the Commission has the authority to investigate. Senator Cushing's penalty was based on reporting and accounting violations, not on the fact that he lent money to a family business. He wondered what the objective of an audit would be if, at the conclusion, there could be no violation found regardless of what the PAC funds were spent on.

Mr. Lee said that Mr. Pattershall's concern was valid. He said that the purpose of the audit would be to determine whether a PAC's report accurately stated the PAC's expenditures, not whether the funds were spent properly. In Senator Cushing's case, there were expenditures that were not reported. The audit would not be a vehicle to criticize or pass judgment on how the funds were spent.

Ms. Lowry said that she would not be disturbed if some Legislators reacted negatively to a random audit program. The Commission would be acting within its authority and performing a function consistent with the Commission's purpose. The Commissioners discussed how the selection process for the random audit would work. Mr. Wayne said that, in general, it will be very clear whether a PAC is a leadership PAC and the staff would be able to identify them. Mr. Wayne brought up two issues for the Commissioners to consider: the potential for a significant time commitment on the part of a Legislator to respond to the audit and the negative reaction and fear that could result simply by being selected for a random audit. Ms. Gardiner suggested that one option the Commission could consider is to announce in advance that the Commission will be conducting random audits in 2018. PACs would then know well in advance that they could be audited, as Maine Clean Election Act candidates know in advance that 20% of them will be audited after the election. Mr. Nass agreed with Ms. Gardiner's suggestion to provide notice of the audit program.

Mr. Pattershall said that the audit program should be extended to all PACs, not just leadership PACs. Ms. Matheson said the goal of the audit program should be to ensure that PAC reporting is transparent – that all expenditures and contributions are reported and that nothing is hidden. That is the transparency that the Commission is supposed to be fostering.

Ms. Matheson encouraged Mr. Wayne to have informal discussions with legislative leadership to sound out their concerns about a random audit program for PACs. Regarding the scope of the audit, Mr. Lee said that he thought that a review of bank statements and other records, rather than a full independent audit, would be sufficient. Mr. Lee suggested that the staff could notify interested parties that the Commission is considering conducting reviews of a random sampling of PACs in the next election cycle to ensure that the PACs are in compliance with campaign finance reporting requirements and that the staff get feedback about the audit program from legislative leadership and others. Mr. Pattershall said that the notice ought to be clear that this program would be more than the usual compliance reviews and would involve a deeper review of a PAC's reports. Mr. Wayne said that he would report back to the Commission at the November meeting regarding the feedback he receives from legislative leadership and others interested parties.

### **3. November 30, 2017 Commission Meeting Minutes (Approved December 20, 2017)**

*Compliance Reviews of Leadership PACs or other Political Committees.* Mr. Wayne said this is a proposed procedure for reviewing campaign finance reports filed by leadership PACs and, perhaps, other PACs and ballot question committees. He said that he reached out to legislative leadership but has not received any comments from legislators. Ms. Lowry said that this would be a worthwhile endeavor for the Commission to undertake and that it was within the Commission's mission. Mr. Wayne suggested that the staff could present a more detailed plan for the review procedure at the Commission's December meeting.

Mr. Lee stated that the scope of the review should be narrowly focused on leadership PACs, at this point; that the review would not entail a full independent audit at the taxpayer's expense, but would consist of a review of the PAC's bank statements and campaign finance reports to verify whether all transactions were accurately reported; and that the PACs would be randomly selected, much the same way as Maine Clean Election Act candidates are selected for audit.

Mr. Nass said that the selection process should be designed in such a way that the leadership PACs of members of both parties are selected for the review. Mr. Wayne said that he would factor that into the procedure to be presented in December. With respect to whether the review should be expanded to include other types of PACs and ballot question committees (BQCs), Mr. Lee said that he originally suggested conducting a more indepth review for leadership PACs only. The problem the Commission recently addressed involved a leadership PAC, and he believed the focus of this new procedure should remain on leadership PACs. In addition, expanding the range of the PACs and BQCs subject to the review could result in a burden on staff resources; whereas, a review of a random selection of leadership PACs would be manageable for the staff. In response to a question from Mr. Pattershall, Mr. Wayne said that this policy would not need to be adopted as a Commission rule.

**4. December 20, 2017 Commission Meeting Minutes (Presented by the Commission's Clean Election Act auditors) (Approved February 22, 2018)**

*Compliance Reviews of Leadership PACs.* Ms. Matheson asked Ms. Connors and Mr. Leonard if they had any thoughts on how to do a random selection of leadership PACs, if the Commission were to go forward with a program to audit those PACs. Mr. Leonard said that it would be important to convey the methodology that would be used in making the random selection and the objective of the program. Mr. Nass asked Mr. Wayne about the definition of a leadership PAC. He asked specifically whether a PAC established by two sitting Legislators would be considered a leadership PAC. Mr. Wayne said that PAC would be excluded from the audit program. He said the PACs with the highest risk are those with only one person involved. Ms. Matheson said the purpose of the audit program was to make sure that PACs were accurately reporting their contributions and expenditures in their campaign finance reports and the audit would be a review of some of the supporting documentation for those transactions. Ms. Lowry said she feels the discussion on this subject is complete. They have suggested some criteria in advance and expressed some of their concerns. There has been a good discussion about how to make a random selection of PACs to be audited and there will be a determination at a later date about ensuring the objectivity of the audit program. The Commission resumed the meeting order on the agenda.

## **5. September 25, 2019 Commission Meeting Minutes (Approved 10/30/2019)**

*Compliance Reviews of 2020 PAC Led by Legislators.* Mr. Lee said this matter was on the agenda to provide the Commission with an update on the plans to conduct compliance reviews of financial activity in 2020 by political action committees which are directed or controlled by a Legislator. Ms. Lowry and Mr. Pattershall recommended some wording changes to the letter. Mr. Nass recommended that the letter be sent to the principal officer of the PAC as well as the treasurer. Ms. Lowry agreed. Mr. Wayne said the staff would make that change. Mr. Lee asked why the staff stated in the letter that the staff would not be publishing separate reports for each PAC. Mr. Wayne said he could take that bullet point out and preserve the opportunity to provide individual reports on the PACs to the Commission. Mr. Lee said he would like to see an individual report if the staff discovered substantial discrepancies which may lead to further Commission action. Mr. Nass said he would like the letter to clearly state that this review applies to leadership PACs. He also said the term “usual procedures” in the sixth bullet point is unclear. The letter should be clearer about what will happen if the staff finds potential violations. Mr. Wayne said he would make those clarifications. The Commission did not have to take any action regarding this agenda item. Mr. Lee moved to adjourn. Ms. Lowry seconded. The motion passed (4-0).

**List of Leadership PACs Registered in 2020**

<b>Committee</b>	<b>Legislator</b>	<b>Party</b>
AROOSTOOK PAC	JOHN MARTIN	Democrat
Building The Maine House	RICHARD CAMPBELL	Republican
CHARLOTTE PAC	CHARLOTTE WARREN	Democrat
Collings Leadership Fund	Benjamin Collings	Democrat
Committee for Peace and Justice	Michael Brennan	Democrat
Conservative Voices of Maine	Michael Perkins	Republican
DON'T TREAD ON MAINE PAC	John Andrews	Republican
Fecteau for Leadership	RYAN FECTEAU	Democrat
GO MAINE PAC	ANDREW MCLEAN	Democrat
Heather PAC	Heather Sanborn	Democrat
HICKMAN CULTIVATING LEADERSHIP PAC	CRAIG HICKMAN	Democrat
LIBBY LEADERSHIP PAC	NATHAN LIBBY	Democrat
Maine First PAC	Lawrence Lockman	Republican
Maine Opportunity PAC	Andrew Gattine	Democrat
Maine Values PAC	Dustin White	Republican
Manufactured Housing Association of Maine PAC	Richard Bradstreet	Republican
Modernize Maine	Scott Strom	Republican
One Maine	Kathleen Dillingham	Republican
PAC to the Future	Matt Moonen	Democrat
Priorities for Coastal Maine PAC	Robert Foley	Republican
PROSPERITY FOR MAINE'S FUTURE	MATTHEW POULIOT	Republican
Revive Home Town Maine PAC	Joel Stetkis	Republican
Shiretown PAC	Gregg Swallow	Republican
Star City PAC	Harold Stewart	Republican
STILL FED UP WITH TAXES	JEFFERY TIMBERLAKE	Republican
Sunshine Hill	Stacey Guerin	Republican
We the People PAC	William Faulkingham	Republican
WESTERN MAINE STRONG PAC	NATHAN WADSWORTH	Republican

# Leadership PAC Historical Contributions

From 2018 and 2019

	2018	2019
Total Contribution Received	\$532,759.77	\$343,522.12
Total No. of Transactions	929	498
Total Transactions Over \$800 from single source	\$351,345.68	\$232,285.29
Total No. of Transactions over \$800 from a single source	168	120
Amount prevented if contribution limit set at \$800	\$256,845.68	\$140,285.29
Total transactions over \$1,500 from a single source	253,770.68	\$146,760
Total No. of Transactions over \$1,500 from a single source	61	42
Amount prevented if contribution limit set at \$1,500	\$186,770.68	\$87,240

Committee Name	2018	2019
Building The Maine House	\$14,250	\$250
CHARLOTTE PAC	\$2,550.44	\$16,650
Collings Leadership Fund	\$7,690	\$923.75
Don't Tread on Maine PAC	N/A	\$2,788
Fecteau for Leadership	\$8,180	\$30,714
GIDEON LEADERSHIP PAC	\$77,543.04	\$9,260
Go Maine PAC	N/A	\$1,000
Heather PAC	\$19,525.93	N/A
HICKMAN CULTIVATING LEADERSHIP PAC	\$14,775	\$100
LANGLEY LEADERSHIP PAC	\$376.98	\$1,071.41
LIBBY LEADERSHIP PAC	\$26,375	\$22,900
Maine First PAC	\$15,060	\$1,000
Maine Opportunity PAC	\$11,330	\$8,940
Momentum Maine	\$43,100.23	N/A
One Maine	\$5,215	\$12,934.36
PAC to the Future	\$15,805	\$21,880
Priorities for Coastal Maine PAC	\$1,350	N/A
PROSPERITY FOR MAINE'S FUTURE	\$61,450	\$108,027.72
RESPECT MAINE	\$13,692.44	\$1,550
SENATE REPUBLICAN PRESIDENTS FUND	\$24,282.5	N/A
Star City PAC	\$35,559	\$47,600
STILL FED UP WITH TAXES	\$108,823.21	\$45,200
Sunshine Hill	\$11,001	\$10,132.88
WESTERN MAINE STRONG PAC	\$15,325	\$600