



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

To: Commissioners  
From: Martha Currier, Assistant Director  
Date: May 20, 2024  
Re: Boothbay-Boothbay Harbor Referendum Investigation

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On April 11, 2024 Boothbay Harbor resident Denise Griffin filed a complaint with the Commission regarding lawn signs and multiple advertisements in the Boothbay Register newspaper by *Citizens for a Bright Future for the Boothbay Region* (“Bright Future”) that promoted the passage of a local referendum on April 24, 2024 regarding funding of a new school building. Her complaint asked whether the sponsors of the communications should register and file campaign finance reports with the Commission based on an October 2023 change in the law requiring municipalities with fewer than 15,000 people to file their referendum political activities with us. Another issue (raised by staff) was whether the communications included the proper disclaimer.

During its preliminary review of this complaint, Commission staff reached out to the Boothbay Register, and people in the community listed on an advertisement by *Bright Future*, which ultimately identified local part-time resident Paul Coulombe’s involvement in the referendum. He indicated to Commission staff that he was willing to “comply with all laws and regulations” as it pertains to campaign finance reporting. Mr. Coulombe was represented by Toby McGrath, a government affairs consultant with Drummond Woodsum at the April 18, 2024 meeting. The Commission authorized a staff investigation to include *Bright Future* and all other participants in the referendum. This memo will update the Commission on the findings and recommend penalties as a result of the investigation.

## REFERNDUM PARTICIPANTS

Commission staff determined three organized groups participated in the referendum: *Bright Future* who supported the measure, and *Citizens for Common Sense Solutions* (“Common Sense”) and *Taxpayers for Common Sense Schools* (“Taxpayers”) who opposed it. Commission

staff investigated spending by all three groups, including by receiving invoices, billing statements, and proof of payment.

*Common Sense* was initiated by Ms. Griffin, who filed the complaint with the Commission. She told Commission staff her group spent \$2,297.60, which is supported by the newspaper's billing statement and a separate proof of payment. She indicated that she was aware of the other group opposing the referendum but was not working with them except for gathering names for a petition for an alternative approach to the \$30 million bond.

*Taxpayers* was created by Patty Minerich, who told Commission staff her group spent \$1,991.71 for advertising in the Boothbay Register and yard signs. She provided a billing statement and a payment receipt from the newspaper, and an invoice for the signs. She said she and Ms. Griffin "were building our own separate coalitions against the school referendums" and "have a different set of friends." She said did not know Ms. Griffin prior to the recent referendum. She acknowledged she and Ms. Griffin "got to know each other and collaborated on a citizens petition for the \$10M option in early April as well as a public forum just before the April 24th vote."

*Bright Future* was an informal group created approximately five years ago to support various initiatives in the Boothbay region. For the April referendum they purchased multiple advertisements in the Boothbay Register and placed lawn signs in the area. As indicated in their letter to the Commission, they had no intent to circumvent the law and were unaware of the October 2023 law changes that required registration and reporting.

## **LEGAL REQUIREMENTS**

In October 2023 the law changed to require municipal BQCs in towns with less than 15,000 people to report to the Commission. At that time, the Commission reached out to all town clerks and provided them with our "2023 Municipal BQC Guidebook", which was also posted to our website.

### Registration

A ballot question committee (BQC) is defined as a person (either an individual or organization) that receives contributions or makes expenditures of more than \$5,000 for the purpose of initiating or influencing a ballot question campaign. 21-A M.R.S. § 1052(2-A). Once a BQC raises or spends more than \$5,000 to influence a municipal referendum in a town with less than 15,000 people, the BQC is required to register with the Commission. 21-A M.R.S. §§ 1052-A(1)(A-1) & 1053-A.

### Initial Campaign Finance and Subsequent Reports

Within seven days after registration, the BQC must file an Initial Campaign Finance Report, covering all financial activities through the day of registration. 21-A M.R.S. § 1059. Registered BQCs are also required to file regular campaign finance reports with the Commission. 21-A M.R.S. § 1059(2).

### Disclaimer on Certain Communications

When a person makes paid communications (e.g., ads or signs) costing more than \$500 expressly advocating support for a referendum, they must include the name and the address of the person(s) who paid for the communication. 21-A M.R.S. § 1055-A.

## **CITIZENS FOR A BRIGHT FUTURE FOR THE BOOTHBAY REGION**

Based on the information provided to the Commission during the investigation, *Bright Future*, is funded by TPI, LLC owned by Mr. Coulombe. Once the BQC became aware of the amendment to the law, they worked diligently with staff to file both their registration and initial campaign finance report.

The BQC has requested review of its preliminary penalties in this case through a May 14, 2024 letter from its consultant, Toby McGrath. The Commission may waive or reduce a penalty for late filing if it determines the report was late due to mitigating circumstances, which are defined as (1) a valid emergency; (2) an error made by the Commission staff; or (3) relevant evidence the committee made a bona fide effort to file report on time. Also, the Commission may waive the

penalty if it is disproportionate to the level of experience of the person filing the report or the harm suffered by the public from late disclosure. 21-A M.R.S. § 1062-A.

Late Registration Penalty

Maine law allows the Commission to consider a discretionary penalty up to \$2,500 when a BQC does not register in a timely manner. 21-A M.R.S. § 1062-A(1). Due to the recent law change, Commission staff do not recommend a late registration penalty.

Late Initial Campaign Finance Report Penalty

Since the BQC was unaware of the requirement to register, their Initial Campaign Finance Report, which must be filed within 7 calendar days of reaching the \$5,000 in contributions or expenditures was untimely filed. The report should have been filed on March 28, but was not filed until April 29.

The information provided on the Boothbay Register invoice and an another for yard signs indicates the group had \$5,000 in expenditures that triggered registration on March 21, 2024, which required them to register and file an Initial Campaign Finance Report with the Commission by March 28. This is contrary to the staff’s preliminary penalty letter that indicated a registration was due on March 21, but still incongruent with Mr. McGrath’s response that the BQC didn’t meet the threshold until March 28. For clarity, below is a chart of expenditures based on the Boothbay Register invoices, and yard sign receipt.

<b>Date of Expenditure</b>	<b>Item ID</b>	<b>Amount</b>
22-Feb	Yard Signs	\$665.71
29-Feb	Register 58781	\$423.00
29-Feb	Register 58782	\$423.00
7-Mar	Register 58822	\$600.00
7-Mar	Register 58823	\$400.00
7-Mar	Register 58824	\$200.00
7-Mar	Register 58843	\$423.00

7-Mar	Register 58844	\$423.00
14-Mar	Register 58959	\$423.00
14-Mar	Register 58960	\$423.00
21-Mar	Register 59055	\$423.00
21-Mar	Register 59056	\$423.00
	<b>TOTAL</b>	\$5,249.71

“Register” refers to the Boothbay Register invoice description.

The information provided in Mr. McGrath’s response suggests that the payment for invoices in the amount of \$2,400 on February 28 somehow offset the \$5,000 threshold to register. Commission staff disagree with that assessment, and believe the BQC should have registered by March 28, which warrants a recalculation of the preliminary penalty for the late filing of their Initial Campaign Finance report as follows:

<b>Report Name</b>	<b>Activity Amount</b>	<b>Due Date</b>	<b>Days Late</b>	<b>Penalty Rate</b>	<b>Penalty</b>
Initial Campaign Finance Report	\$5,753.71	3/28/2024	32	2%	\$3,862.24

Under the Commission’s statutes, the late filing of a report triggers an enforcement process. 21-A M.R.S. § 1062-A. The penalty is based on the amount of financial activity in the report, the number of calendar days the report is late, and the history of violations of the committee.

Lack of Proper Disclaimer Penalty

When a BQC makes expenditures exceeding \$500 expressly advocating for or against a referendum on the ballot, the communication must clearly and conspicuously state the name and address of the person who made or financed the communication. 21-A M.R.S. § 1055-A. Based on the records provided to the Commission, the BQC made one transaction for lawn signs that required the disclaimer, which contained no disclosure whatsoever.

A violation of this requirement may result in a penalty of no more than \$5,000. When assessing a penalty for lack of disclaimers the commission considers, among other things, how widely the communication was disseminated, whether the violation was intentional, whether it was due to an error by another, and whether the communication conceals or misrepresents the person who financed it.

## **TAXPAYERS FOR COMMON SENSE SCHOOLS AND CITIZENS FOR COMMON SENSE SOLUTIONS**

Although no written complaint was filed concerning these two groups that were opposed to the referendum, Commission staff investigated their spending, including by reviewing invoices, billing statements, and proof of payment. Neither group's spending approached the \$5,000 spending threshold. In an email to the Commission, Mr. McGrath asked the Commission to consider whether the two groups intentionally avoided disclosure by dividing their spending between the two groups. Both groups have stated to the Commission staff that they acted separately. Even if they had acted together, their combined spending was below the \$5,000 spending threshold to require BQC registration. We recommend no action concerning these two groups.

## **STAFF RECOMMENDATION**

When *Bright Future* became aware of their filing obligations with the Commission, they complied within 11 days. Commission staff appreciate their efforts to compile the information and disclose it to the public are required by law. Given the circumstances of this new municipal filing requirement, Commission staff suggest (1) no penalty for the late registration; (2) a penalty of \$250 for the late initial campaign finance report; and (3) a \$50 penalty for the lack of disclaimer on the lawn signs, for a total penalty of \$300. Since 2018, the Commission has reduced late-filing penalties for late reports to at least \$750. In this case, staff recommends a lower penalty because it is understandable that *Bright Future* would be unaware of the 2023 law change, it acted quickly to remedy the error after reviewing its spending, and its total spending of \$5,249 is barely over the \$5,000 threshold.

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**Formal Complaint Regarding A BQC In The Boothbay Region**

1 message

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denise griffin <dgriffin368@gmail.com>  
To: "ethics@maine.gov" <ethics@maine.gov>  
Cc: denise griffin <dgriffin368@gmail.com>

Thu, Apr 11, 2024 at 11:42 AM

Dear Sir/Madam:

The Boothbay-Boothbay Harbor Community School District is holding a referendum on April 24, 2024 for a bond in the amount of \$ 29,975,000.00. See here (and the Town of Boothbay has an identical ballot):

[https://www.boothbayharbor.org/uploads/visual\\_edit/sample-ballot-csd.pdf](https://www.boothbayharbor.org/uploads/visual_edit/sample-ballot-csd.pdf)

A group calling themselves "Citizens for a bright future for the Boothbay Region " appears to have spent more than \$ 5,000.00 in advertising to support the bond referendum noted above. I believe they have not registered as a BQC. Specifically, they have placed (paper) advertisements in the local newspaper, the Boothbay Register, as follows:

2/29/24: 2 ads estimated at \$ 800.00  
3/7/24: 2 ads estimated at \$ 800.00  
3/14/24: 2 ads estimated at \$ 800.00  
3/21/24: 2 ads estimated at \$ 800.00  
3/28/24: 1 small and 1 large ad estimated at \$ 1900.00  
4/4/24: 2 ads estimated at \$ 800.00  
4/11/24: 2 ads estimated at \$ 800.00

Furthermore, they have spent additional funds on on-line advertising (cost unknown but likely at least \$ 600.00) and on road signage (cost unknown but likely to be at least \$ 400.00).

Therefore, I am filing a formal complaint because I believe this group has violated the BQC statute which took effect on October 25, 2023. I am asking that you investigate.

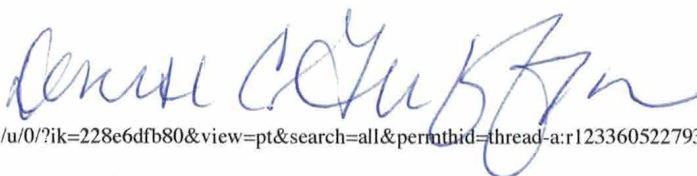
I do not know who is behind this group. I would like to know who the group's treasurer is and who the donors are.

I can only give you information about the newspaper: <https://www.boothbayregister.com/contact-us-who-we-are>

In the interest of transparency, please note that I have organized a group called Common Sense Solutions. This group has spent a total of \$ 2,297.00 to defeat the referendum.

Please feel free to contact me if you have any questions.

Sincerely,





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

May 13, 2024

Mr. John Suczynski, Treasurer  
Citizens for a Bright Future for the Boothbay Region  
50 Maple Sugar Lane  
Boothbay Harbor, ME 04537

Re: Opportunity to Respond to Findings of Violation and Penalties - **UPDATED**

Dear Mr. Suczynski:

The purpose of this letter is to invite *Citizens for a Bright Future for the Boothbay Region* (the BQC) to respond to three potential findings of violation and penalties that are scheduled for the Ethics Commission's May 29, 2024 meeting:

- (1) not registering as a ballot question committee on time (discretionary penalty of up to \$2,500),
- (2) filing an Initial Campaign Finance Report late (the BQC may ask for a waiver of the \$4,602.80 preliminary penalty), and
- (3) not including the committee's name and address in yard signs and advertising in the Boothbay Register (discretionary penalty of up to \$5,000 per communication).

Please submit a written response by May 15, 2024 by emailing it to [Martha.Currier@maine.gov](mailto:Martha.Currier@maine.gov)

### **Committee Registration**

The Commission staff has found that the BQC was late in filing its Committee Registration filed on 4/29/2024. Once a committee receives or spends more than \$5,000 on a municipal ballot measure it must register with this office within 7 days. 21-A M.R.S. § 1052-A(1)(A-1). The BQC received more than \$5,000 in in-kind contributions on 3/14/2024, which required registration with this office by 3/21/2024. When a committee fails to register in a timely manner, the Commission may assess a fine of no more than \$2,500. In assessing a fine, the Commission considers whether the violation was intentional, the amount of campaign activity involved, and whether the committee intended to conceal its campaign activity, in addition to the level of experience of its volunteers and staff. 21-A M.R.S. § 1062-A(1).

### **Campaign Finance Report**

The Commission staff has made a finding that the BQC was late in filing its Initial Campaign Finance Report. The report was due by 11:59 p.m. on 3/21/2024 but was not filed until 4/29/2024. Under the Commission's statutes, the late filing of a report triggers an enforcement process. 21-A M.R.S. § 1062-A. Based on the amount of financial activity in the report, the number of calendar days the report is late, and any history of violations from the committee, the Commission staff has determined a penalty of \$4,602.80 is owed. (Please see attached penalty matrix for the calculation.)

The Commission may waive the penalty for filing campaign finance reports late if it determines the reports were late due to mitigating circumstances, which are defined as (1) a valid emergency; (2) an error made by the Commission staff; or (3) relevant evidence the committee made a bona fide effort to file the

OFFICE LOCATED AT: 45 MEMORIAL CIRCLE, AUGUSTA, MAINE  
WEBSITE: WWW.MAINE.GOV/ETHICS

PHONE: (207) 287-4179

FAX: (207) 287-6775



report on time. Also, the Commission may waive the penalty if it is disproportionate to the level of experience of the person filing the report or the harm suffered by the public from the late disclosure.

**Political Communications to Influence a Ballot Question**

When a BQC makes expenditures exceeding \$500 expressly advocating for or against a referendum on the ballot, the communication must clearly and conspicuously state the name and address of the person who made or financed the communication. 21-A M.R.S. § 1055-A. The lawn signs purchased by the BQC contained no disclosure whatsoever. The advertisements in the Boothbay Harbor Register contained the committee's name, but not its address. A violation of this requirement may result in a penalty of no more than \$5,000. When assessing a penalty for lack of disclaimers the commission considers, among other things, how widely the communication was disseminated, whether the violation was intentional, whether it was due to an error by another, and whether the communication conceals or misrepresents the person who financed it.

Please contact me if you have any questions at (207) 287-3024.

Sincerely,



Martha Currier  
Assistant Director

Enc.

cc: Toby McGrath, by email only

**Committee Name:** Citizens for a Bright Future for the Boothbay Region

**Prior Violations:** 0

<b>Report Name</b>	<b>Activity Amount</b>	<b>Due Date</b>	<b>Days Late</b>	<b>Penalty Rate</b>	<b>Penalty</b>
Initial Campaign Finance Report	\$5,753.71	3/21/2024	40	2%	\$4,602.80

The penalty for late filing of a required report is a percentage of the total contributions or expenditures for the filing period, whichever is greater, multiplied by the number of calendar days the report is filed late, as follows:

For the first violation, 2%

For the second violation, 4%

For the third and each subsequent violation, 6%

**A penalty begins to accrue at 11:59 p.m. on the day the report is due.**

**A required report sent by certified or registered United States mail and postmarked at least 2 days before the deadline is not subject to penalty.**

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

#### MAXIMUM PENALTIES

21-A M.R.S. Section 1062-A(4)

\$10,000, except if the financial activity reported late exceeds \$50,000, the maximum penalty is 100% of the amount reported late.

Tuesday, May 14, 2024

Ethic Commission Members & Staff  
45 Memorial Circle  
Augusta, Maine 04330

Re: Citizens for a Bright Future for the Boothbay Region

Dear Commission Members & Staff:

**Background.** Citizens for a Bright Future for the Boothbay Region has been a loose collection of supporters for various initiatives in the Boothbay region for roughly five years. The group was not a formal organization until they registered as a Ballot Question Committee on April 29, 2024. This group was merely a group of supporters in the region that advocated for improvements like the bond referendum to support the children, families, teachers, and staff at middle and elementary schools. The conditions of the school have been hazardous due to deterioration in the buildings.

The funder of Citizens for a Bright Future for the Boothbay Region was TPI, LLC which is owned by Mr. Paul Coulombe. Mr. Coulombe has been publicly supportive of renovating the schools. In August of 2021, Mr. Coulombe participated in a fundraising event where he matched contributions. This event raised roughly \$2.5 million. The proceeds paid for the architectural design and consultants to recommend the best path forward for the schools in the community. These costs would have burdened the taxpayers of the region if it were not for Mr. Coulombe's willingness to support the schools and the community. In regard to this issue, it clearly displays Mr. Coulombe's willingness to be transparent about what he supports in the area. There was no nefarious reason to hide his support for the bond referendum.

There was no intent by Mr. Coulombe or supporters of Citizens for a Bright Future for the Boothbay Region to skirt Maine campaign finance laws. This was an honest mistake by Mr. Coulombe and the other supporters of the initiative. This I personally have knowledge of since I previously advised Mr. Coulombe on a local ordinance referendum in 2019.

In 2019, Maine campaign finance laws did not require municipalities to disclose donors or expenditures for municipalities with populations under 15,000 people. Maine municipal campaign finance laws changed in 2023 to include municipalities under 15,000 people. However, Citizens for a Bright Future for the Boothbay Region supporters, including Mr. Coulombe, were not aware of the change. Supporting the bond was another philanthropic gesture by Mr. Coulombe and he had no reason to hide his support since he had already been very supportive of the project publicly.

When the Ethics Commission staff contacted Citizens for a Bright Future for the Boothbay Region, I was contacted by Mr. Coulombe. I informed him and Citizens for a Bright Future for the Boothbay Region that the law had indeed changed. I contacted the Ethics Commission staff and we reported all of our expenditures and the donor immediately. They were just unaware of the change and had no legal or campaign professionals for compliance because they did not

believe they needed any due to their experience on 2019 ordinance vote. This was truly an oversight.

**Technicality Issue.** My client disagrees that they should have registered their committee on 3/21/2024. The Ethics Commission Staff letter indicates that Citizens for a Bright Future for the Boothbay Region should have filed 3/21/2024.

As indicated in the chart below, based off of the invoices provided to Ethics Commission staff, as of 3/14/2024 that Citizens for a Bright Future for the Boothbay Region in-kind contributions/expenditures were \$3,353.71, not meeting the \$5,000 threshold. We contend that the \$5,000 threshold was surpassed on 3/28/2024. Meaning Citizens for a Bright Future for the Boothbay Region should have been filed on 4/3/2024.

Date	Item	Cost		
2/2/2024	Yard Signs	\$665.71		
2/28/2024	Prepaid Reimbursement	(\$1,200.00)		
2/28/2024	Digital Ads	\$600.00		
2/28/2024	Digital Ads	\$400.00		
2/28/2024	Digital Ads	\$200.00		
2/28/2024	Digital Ads	\$600.00		
2/28/2024	Digital Ads	\$400.00		
2/28/2024	Digital Ads	\$200.00		
2/28/2024	Digital Ads	\$75.00		
2/28/2024	Digital Ads	\$75.00		
2/28/2024	Prepaid Reimbursement	(\$1,200.00)		
2/29/2024	Newspaper Ads	\$846.00		
3/7/2024	Newspaper Ads	\$423.00		
3/7/2024	Newspaper Ads	\$423.00		
3/14/2024	Newspaper Ads	\$423.00		
3/14/2024	Newspaper Ads	\$423.00	\$3,353.71	Total In-kind as of 3/24/2024
3/21/2024	Newspaper Ads	\$423.00		
3/21/2024	Newspaper Ads	\$423.00		
3/28/2024	Newspaper Ads	\$423.00		
3/28/2024	Newspaper Ads	\$1,565.55	\$6,188.26	Total In-kind as of 3/28/2024

We believe this error to have occurred in one of two ways 1) Ethics Committee staff reviewed the invoices, which were confusing, and showed two expenditures for \$1200 each on 2/28/2024 for a total of \$2400 but were reimbursements or 2) Ethics Committee staff utilized the initial BQC filing which erroneously submitted the \$2400 in reimbursements as in-kind contributions. Citizens for a Bright Future for the Boothbay Region will amend the report if that's the case but had technical difficulty amending the registration.



We do highlight this discrepancy because of the penalty rate of 2% being assessed for not filing a report once Citizens for a Bright Future for the Boothbay Region BQC reached the \$5,000 threshold. Technically the days late for the initial filing report should be 26 days not 40 days.

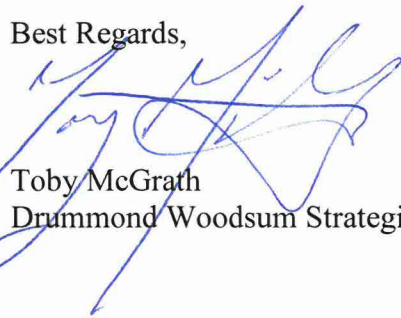
Citizens for a Bright Future for the Boothbay Region does apologize for the burden this has placed on the staff. This was not our intent. We would also highlight that the staff was a helpful, responsive and professional on this issue.

**Request for Reducing Fine.** On March 10, 2020 the Commission fined Mainers for Local Power PAC \$2,500 for not complying with a new campaign finance law which required PACs to provide written notices to two contributors that they qualified as “major contributors” and were required to file reports with the Commission. The preliminary penalties for providing the late written notices totaled \$53,431. The Commission unanimously voted to impose a penalty of \$2,500. This was a reduction of \$50,931 or %95.

Regarding this situation, we ask the Commission to impose a penalty of no more than \$230.14. \$230.14 is 5% of the staff recommendation of \$4,602.80. This would stay in line with the Commission’s previous decision on Mainers for Local Power PAC. If the Commission agrees that the filing was 26 days tardy and not 40, we ask for a penalty of \$149.60. This would be the equivalent of 5% of a 26 day tardy filing.

Thank you for your consideration. We do want to thank the Commission staff again for their professionalism and responsiveness. I look forward to seeing you all at the May 29, 2024, Ethics Commission meeting.

Best Regards,



Toby McGrath  
Drummond Woodsum Strategic Consulting



Commission on Governmental Ethics and Election Practices  
Mail: 135 State House Station, Augusta, Maine 04333  
Office: 45 Memorial Circle, Augusta, Maine  
Website: [www.maine.gov/ethics](http://www.maine.gov/ethics)  
Phone: 207-287-4179  
Fax: 207-287-6775

## 2024 REGISTRATION: POLITICAL ACTION COMMITTEE

COMMITTEE INFORMATION	
Citizens for a Bright Future for the Boothbay Region 50 Sugar Maple Lane Boothbay Harbor, ME 04537  PAC TYPE:       Municipal BQC	Phone:     (207) 633-3673 Fax:  Email:     email@email.com  Web:
TREASURER INFORMATION	
Mr. John Suczynski 50 Sugar Maple Lane Boothbay Harbor, ME 04537	Public: Fax: Email:     john_suczynski@yahoo.com
PRINCIPAL OFFICER INFORMATION	
Ms. Paul Coulombe Principal Officer 50 Sugar Maple Lane, PO Box 757 Boothbay Harbor, ME 04537	Public:     (207) 633-3673  Email:     email@email.com
DECISION MAKERS AND FUNDRAISERS	
LEGISLATORS AND CANDIDATES WITH A SIGNIFICANT ROLE IN THIS PAC	
FORM OF ORGANIZATION	
Municipal BQC	Date of origin / incorporation 02/02/2024
FOUNDING ORGANIZATIONS	
STATEMENT OF SUPPORT OR OPPOSITION	
SUPPORT	Do you favor authorizing the Board of Trustees of Boothbay-Boothbay Harbor Community School District to construct and equip renovations and a middle school addition at Boothbay Elementary School and to issue bonds or notes in the name of the District for school construction and minor capital purposes in an amount not to exceed \$29,975,000?
CERTIFICATION	
I, Mr. John Suczynski, certify that the information in this registration is true, accurate, and complete.	
SIGNATURE	Date:       February 02, 2024

Filed Date:       2/2/2024  
Amended Date:

PAC Registration



Commission on Governmental Ethics and Election Practices  
Mail: 135 State House Station, Augusta, Maine 04333  
Office: 45 Memorial Circle, Augusta, Maine  
Website: [www.maine.gov/ethics](http://www.maine.gov/ethics)  
Phone: 207-287-4179  
Fax: 207-287-6775

## 2024 CAMPAIGN FINANCE REPORT

### FOR POLITICAL ACTION COMMITTEES

COMMITTEE		TREASURER	
Citizens for a Bright Future for the Boothbay Region 50 Sugar Maple Lane Boothbay Harbor, ME 04537 PHONE:(207) 633-3673 EMAIL: email@email.com		Mr. John Suczynski 50 Sugar Maple Lane Boothbay Harbor, ME 04537 PHONE: EMAIL: john_suczynski@yahoo.com	
REPORT	DUE DATE	REPORTING PERIOD	
11-Day Pre-Election Report	04/15/2024	01/01/2024 - 04/10/2024	

#### FINANCIAL ACTIVITY SUMMARY

RECEIPTS	TOTAL FOR PERIOD	TOTAL FOR YEAR
1. CASH CONTRIBUTIONS (SCHEDULE A)	\$0.00	\$0.00
2. OTHER CASH RECEIPTS (INTEREST, ETC.)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS (LINE 1 + 2 + 3)	\$0.00	\$0.00
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B)	\$0.00	\$0.00
6. OPERATING EXPENDITURES (SCHEDULE B-1)	\$0.00	\$0.00
7. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
8. TOTAL PAYMENTS (LINE 5 + 6 + 7)	\$0.00	\$0.00
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD	\$0.00	
10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$0.00	
11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$0.00	
12. CASH BALANCE AT END OF PERIOD	\$0.00	
OTHER ACTIVITY		
13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$9,524.26	\$9,524.26
14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	

I, **John Suczynski**, CERTIFY THAT THE INFORMATION CONTAINED IN THIS REPORT IS TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE.

REPORT FILED BY: Martha Currier on behalf of John Suczynski  
REPORT FILED ON: 5/2/2024 1:01:01 PM  
LAST MODIFIED:  
COMMITTEE ID: 493794

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

- In-kind contributions are goods and services (including facilities) that a candidate received at no cost or at a cost less than the fair market value. they include all goods and services purchased for the campaign by the candidate or supporters if the campaign does not expect to reimburse the candidate or supporter. These contributions may come from the candidate, candidate's family, supporters, PACs, party committees, or other entities.
- For contributors who gave more than \$50, the names, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the candidate is waiting to receive that information.
- In-kind contributions of \$50 or less can be added together and reported as a lump sum.
- If the candidate received a discount on goods and services, the amount of the discount must be reported as an in-kind contribution.
- Total contributions (cash and in-kind) from the same source (except the candidate and candidate's spouse or domestic partner) may NOT exceed \$350 in any election for the legislative candidates, \$750 for county candidates, or \$1500 for gubernatorial candidates. For party candidates, the primary and general elections are considered separate election. For non-party candidates, there is only one election, the general election.

1 = Individual

9 = Candidate / Candidate Committee

2 = Candidate/ Spouse/ Domestic Partner

10 = General Treasury Transfer

3 = Commercial Source

11 = Transfer from Previous Campaign

4 = Nonprofit Organization

12 = Contributors giving \$50 or less

5 = Political Action Committee

13 = Contributors giving \$100 or less

6 = Political Party Committee

14 = Contributors giving \$200 or less

7 = Ballot Question Committee

15 = MCEA Payment

8 = Other Candidate/ Candidate Committee

16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	EMPLOYER AND OCCUPATION	DESCRIPTION (of goods, services, facilities, or discounts received)	TYPE	AMOUNT
2/22/2024	TPI, LLC 50 Sugar Maple Lane PO Box 757 Boothbay Harbor, ME, 04537		Signs.com Yard Signs	3	\$665.71
2/28/2024	TPI, LLC 50 Sugar Maple Lane PO Box 757 Boothbay Harbor, ME, 04537		Boothbay Register - Social Media Online Advertising	3	\$1,350.00
2/28/2024	TPI, LLC 50 Sugar Maple Lane PO Box 757 Boothbay Harbor, ME, 04537		Boothbay Register - Newspaper and print media ads	3	\$1,200.00
2/29/2024	TPI, LLC 50 Sugar Maple Lane PO Box 757 Boothbay Harbor, ME, 04537		Boothbay Register - Newspaper and print media ads	3	\$846.00
3/7/2024	TPI, LLC 50 Sugar Maple Lane PO Box 757 Boothbay Harbor, ME, 04537		Boothbay Register - Newspaper and print media ads	3	\$846.00
3/14/2024	TPI, LLC 50 Sugar Maple Lane PO Box 757 Boothbay Harbor, ME, 04537		Boothbay Register - Newspaper and print media ads	3	\$846.00



3/21/2024	TPI, LLC 50 Sugar Maple Lane PO Box 757 Boothbay Harbor, ME, 04537		Boothbay Register - Newspaper and print media ads	3	\$846.00
3/28/2024	TPI, LLC 50 Sugar Maple Lane PO Box 757 Boothbay Harbor, ME, 04537		Boothbay Register - Newspaper and print media ads	3	\$1,988.55
4/4/2024	TPI, LLC 50 Sugar Maple Lane PO Box 757 Boothbay Harbor, ME, 04537		Boothbay Register - Newspaper and print media ads	3	\$936.00
<b>TOTAL IN-KIND CONTRIBUTIONS</b>					\$9,524.26

**VOTE YES**

**On April 24**

**SUPPORT OUR SCHOOLS!**



Wiscasset Newspaper

Office Location:  
 97 Townsend Avenue · Boothbay Harbor, Maine 04538  
 Phone (207) 633-4620 · Fax (207) 633-7118

Citizens For A Brighter Future  
 Attn: Kate Thomas  
 PO Box 757  
 Falmouth, ME 04105-0757

**PAID**  
**02/27/24**

2/29/24  
**Invoice 40484**

Due Date 2/29/24

**CHANGE OF PAYMENT ADDRESS**  
 Effective Immediately:  
 Maine-OK Enterprises, Inc.  
 97 Townsend Ave  
 Boothbay Harbor, ME 04538

Account # 12261

Terms Pre-Pay

Date	Item Code	Class	DBA	Description	Qty.	Rate	Amount
	ROP	SBM ...		02/29/24 58781 Vote Yes on 1	36	11.75	423.00
	ROP	SBM ...		02/29/24 58782 Vote Yes on 1	36	11.75	423.00

*Please make checks payable to: Maine-OK Enterprises, Inc.*

BALANCES NOT PAID IN FULL BY THE DUE DATE ARE PAST DUE AND SUBJECT TO LATE CHARGES.

**WE ACCEPT MASTERCARD, VISA, DISCOVER, AMERICAN EXPRESS.**

PLEASE CONTACT OUR OFFICE IF YOU WISH TO PAY YOUR INVOICE BY CREDIT CARD.

CHARGES WILL APPEAR AS MAINE-OK ENT., BOOTHBAY REGISTER OR PENOBSCOT BAY PILOT ON YOUR STATEMENT.

Sales Tax (5.5%) \$0.00

**Total \$846.00**



Wiscasset Newspaper

Office Location:  
 97 Townsend Avenue · Boothbay Harbor, Maine 04538  
 Phone (207) 633-4620 · Fax (207) 633-7118

Citizens For A Brighter Future  
 Attn: Kate Thomas  
 PO Box 757  
 Falmouth, ME 04105-0757

**PAID**  
**03/25/24**

**3/31/24**  
**Invoice 40507**

Due Date **3/31/24**

**CHANGE OF PAYMENT ADDRESS**  
 Effective Immediately:  
 Maine-OK Enterprises, Inc.  
 97 Townsend Ave  
 Boothbay Harbor, ME 04538

Account # **12261**

Terms **Pre-Pay**

Date	Item Code	Class	DBA	Description	Qty.	Rate	Amount
	Web Display Billboard	SBM ...		BR 03/07,14,21,28 58822 Vote Yes on 1	4	150.00	600.00
	Web Display Home Top	SBM ...		BR 03/07,14,21,28 58823 Vote Yes on 1	4	100.00	400.00
	Email Display AM Catch	SBM ...		BR 03/07,14,21,28 58824 Vote Yes on 1	4	50.00	200.00
2/28/24	Prepaid Item-BRWN-Digital	SBM ...		Amex Auth 217633	-1	1,200.00	-1,200.00
3/7/24	ROP	SBM ...		03/07/24 58843	36	11.75	423.00
3/7/24	ROP	SBM ...		03/07/24 58844	36	11.75	423.00
3/14/24	ROP	SBM ...		03/14/24 58959	36	11.75	423.00
3/14/24	ROP	SBM ...		03/14/24 58960	36	11.75	423.00
3/21/24	ROP	SBM ...		03/21/24 59055	36	11.75	423.00
3/21/24	ROP	SBM ...		03/21/24 59056	36	11.75	423.00
3/28/24	ROP	SBM ...		03/28/24 59145	36	11.75	423.00
3/28/24	Demand Area	SBM ...		03/28/24 59117	147	10.65	1,565.55

*Please make checks payable to: Maine-OK Enterprises, Inc.*

BALANCES NOT PAID IN FULL BY THE DUE DATE ARE PAST DUE AND SUBJECT TO LATE CHARGES.

**WE ACCEPT MASTERCARD, VISA, DISCOVER, AMERICAN EXPRESS.**

PLEASE CONTACT OUR OFFICE IF YOU WISH TO PAY YOUR INVOICE BY CREDIT CARD.

CHARGES WILL APPEAR AS MAINE-OK ENT., BOOTHBAY REGISTER OR PENOBSCOT BAY PILOT ON YOUR STATEMENT.

Sales Tax (5.5%) \$0.00

**Total \$4,526.55**



Wiscasset Newspaper

Office Location:  
 97 Townsend Avenue · Boothbay Harbor, Maine 04538  
 Phone (207) 633-4620 · Fax (207) 633-7118

Citizens For A Brighter Future  
 Attn: Kate Thomas  
 PO Box 757  
 Falmouth, ME 04105-0757

**PAID**  
**04/15/24**

**4/30/24**  
**Invoice 40508**

Due Date **4/30/24**

**CHANGE OF PAYMENT ADDRESS**  
 Effective Immediately:  
 Maine-OK Enterprises, Inc.  
 97 Townsend Ave  
 Boothbay Harbor, ME 04538

Account # **12261**

Terms **Pre-Pay**

Date	Item Code	Class	DBA	Description	Qty.	Rate	Amount
	Web Display Billboard	SBM ...		BR 04/04,11,18,25 58822 Vote Yes on 1	4	150.00	600.00
	Web Display Home Top	SBM ...		BR 04/04,11,18,25 58823 Vote Yes on 1	4	100.00	400.00
	Email Display AM Catch	SBM ...		BR 04/04,11,18,25 58824 Vote Yes on 1	4	50.00	200.00
	Web Display Subject Sponsor	SBM ...		BR 04/04,11,18 59251	3	25.00	75.00
	Web Display Subject Sponsor	SBM ...		BR 04/04,11,18 59252	3	25.00	75.00
2/28/24	Prepaid Item-BRWN-Digital	01-B...		Amex Auth 217633		-1,200.00	-1,200.00
4/4/24	Demand Area	SBM ...		04/04/24 59244	36	13.00	468.00
4/4/24	Demand Area	SBM ...		04/04/24 59245	36	13.00	468.00
4/11/24	Demand Area	SBM ...		04/11/24 59348	36	13.00	468.00
4/11/24	Demand Area	SBM ...		04/11/24 59349	36	13.00	468.00
4/18/24	Demand Area	SBM ...		04/18/24 59248	147	10.65	1,565.55

*Please make checks payable to: Maine-OK Enterprises, Inc.*

BALANCES NOT PAID IN FULL BY THE DUE DATE ARE PAST DUE AND SUBJECT TO LATE CHARGES.

**WE ACCEPT MASTERCARD, VISA, DISCOVER, AMERICAN EXPRESS.**

PLEASE CONTACT OUR OFFICE IF YOU WISH TO PAY YOUR INVOICE BY CREDIT CARD.

CHARGES WILL APPEAR AS MAINE-OK ENT., BOOTHBAY REGISTER OR PENOBSCOT BAY PILOT ON YOUR STATEMENT.

Sales Tax (5.5%) \$0.00

**Total \$3,587.55**



## 21-A M.R.S. § 1052. Definitions

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As used in this subchapter, unless the context otherwise indicates, the following terms have the following meanings.

...

**2-A. Ballot question committee.** “Ballot question committee” means a person that receives contributions or makes expenditures aggregating in excess of \$5,000 for the purpose of initiating or influencing a campaign, other than a campaign for the nomination or election of a candidate. The term “ballot question committee” does not include a political action committee or an exempt donor.

...

## 21-A § 1052-A. Registration

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A committee shall register with the commission and amend its registration as required by this section. A registration is not timely filed unless it contains all the information required in this section.

**1. Deadlines to file and amend registrations.** A committee shall register and file amendments with the commission according to the following schedule.

**A.** A political action committee as defined under section 1052, subsection 5, paragraph A, subparagraph (1) or (5) shall register with the commission within 7 days of receiving contributions or making expenditures in the aggregate in excess of \$2,500.

**A-1.** A ballot question committee shall register with the commission within 7 days of receiving contributions or making expenditures in the aggregate in excess of \$5,000.

**A-2.** A registered committee that does not qualify for an exception to registration pursuant to subsection 1-A shall register as a political action committee or ballot question committee, as applicable, within 7 days of exceeding the \$10,000 threshold specified in subsection 1-A.

**B.** A committee shall amend the registration within 10 days of a change in the information that committees are required to disclose under this section.

**C.** A committee shall file an updated registration form between January 1st and March 1st of each year in which a general election is held. The commission may waive the updated registration requirement for a newly registered political action committee or other registered committee if the commission determines that the requirement would cause an administrative burden disproportionate to the public benefit of the updated information.

**1-A. [omitted]**

**2. Disclosure of treasurer and officers.** A committee must have a treasurer and a principal officer. The same individual may not serve in both positions, unless the committee is an individual registering as a ballot question committee. The committee’s registration must contain the names and addresses of the following individuals:

**A.** The treasurer of the committee;

**B.** A principal officer of the committee;

**C.** Any other individuals who are primarily responsible for making decisions for the committee;

**D.** The individuals who are primarily responsible for raising contributions for the committee; and

**E.** The names of any other candidates or Legislators who have a significant role in fund-raising or decision-making for the committee.

**3. Other disclosure requirements.** A committee's registration must also include the following information:

- A.** A statement indicating the specific candidates, categories of candidates or campaigns or ballot questions that the committee expects to support or oppose;
- B.** If the committee is formed to influence the election of a single candidate, the name of that candidate;
- C.** The form or structure of the organization, such as a voluntary association, membership organization, corporation or any other structure by which the committee functions, and the date of origin or incorporation of the organization;
- D.** If the committee has been formed by one or more for-profit or nonprofit corporations or other organizations for the purpose of initiating or influencing a campaign, the names and addresses of the corporations or organizations;
- E.** The name of the account that the committee will use to deposit contributions and make expenditures pursuant to section 1054, and the name and address of the financial institution at which the account is established; and
  - E-1.** [2023, ch. 244, § 14 (RP).]
- F.** Any additional information reasonably required by the commission to monitor the activities of committees in this State under this subchapter.

**4. Acknowledgment of responsibilities.** The treasurer, principal officer and any other individuals who are primarily responsible for making decisions for the committee shall submit a signed statement acknowledging their responsibilities on a form prescribed by the commission within 10 days of registering the committee. The signed acknowledgment statement serves as notification of the responsibilities of the committee to comply with the financial reporting, record-keeping and other requirements of this chapter and the potential personal liability of the treasurer and principal officer for civil penalties assessed against the committee. The commission shall notify the committee of any individual who has failed to submit the acknowledgment statement. Failure to return the acknowledgment statement is a violation of this subchapter for which a fine of \$100 may be assessed against the committee. This section also applies to individuals named in an updated or amended registration required by this subsection who have not previously submitted an acknowledgment statement for the committee with the commission.

**5. Resignation and removal.** An individual who resigns as the treasurer, principal officer or primary decision maker of a committee shall submit a written resignation statement to the commission. An individual's resignation is not effective until the commission receives the written resignation statement from the individual. If an individual is involuntarily removed from the position of treasurer, principal officer or primary decision maker by the committee, the committee shall notify the commission in writing that the individual has been removed from the position. The commission may prescribe forms for these purposes.

**6. Modified registration.** The commission may adopt simplified registration procedures and forms for an individual registering as a ballot question committee to initiate or influence a ballot question.

## 21-A M.R.S. § 1053-A. Municipal elections (highlighting added)

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If an organization qualifies as a committee under section 1052, subsection 2 and that organization receives contributions or makes expenditures to influence a municipal campaign in towns or cities with a population of 15,000 or more, that organization must register and file reports with the municipal clerk as required by Title 30-A, section 2502. **If an organization qualifies as a ballot question committee under section 1052, subsection 2-A and that organization makes expenditures exceeding \$5,000 to influence a municipal referendum campaign in a town or city with a population of less than 15,000, that organization must register and file reports with the commission using the electronic filing system pursuant to section 1059, subsection 5.** The reports must be filed in accordance with the reporting schedule in section 1059 and must contain the information listed in section 1060. A committee registered with the commission and that receives contributions or makes expenditures relating to a municipal election shall file a copy of the report containing such contributions or expenditures with the clerk in the subject municipality. The commission retains the sole authority to prescribe the content of all reporting forms. The commission does not have responsibility to oversee the filing of registrations or campaign finance reports relating to municipal campaigns in towns or cities with a population of 15,000 or more. If a municipal clerk becomes aware of a potential violation of this subchapter that the clerk considers to be substantial, the clerk may refer the matter to the commission for enforcement. The commission may conduct an investigation if the information referred by the municipal clerk shows sufficient grounds for believing that a violation may have occurred. After conducting the investigation, if the commission determines that a violation of this subchapter has occurred, the commission may assess penalties provided in this subchapter.

## 21-A M.R.S. § 1055-A. Political communications to influence a ballot question

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**1. Communications to influence ballot question elections.** Whenever a person makes an expenditure exceeding \$500 expressly advocating through broadcasting stations, cable television systems, prerecorded automated telephone calls or scripted live telephone calls, newspapers, magazines, campaign signs or other outdoor advertising facilities, publicly accessible sites on the Internet, direct mails or other similar types of general public political advertising or through flyers, handbills, bumper stickers and other nonperiodical publications, for or against an initiative or referendum that is on the ballot, the communication must clearly and conspicuously state the name and address of the person who made or financed the expenditure for the communication, except that telephone calls must clearly state only the name of the person who made or financed the expenditure for the communication. A digital communication costing more than \$500 that includes a link to a publicly accessible website expressly advocating for or against an initiative or referendum that is on the ballot must clearly and conspicuously state the name of the person who made or financed the expenditure, unless the digital communication is excluded under subsection 2. Telephone surveys that meet generally accepted standards for polling research and that are not conducted for the purpose of influencing the voting position of call recipients are not required to include the disclosure.

**2. Exceptions.** The following forms of political communication do not require the name and address of the person who made or financed the expenditure for the communication because the name or address would be so small as to be illegible or infeasible: clothing, envelopes and stationery, small promotional items, tickets to fundraisers and electronic media advertisements where compliance with this section would be impracticable due to size or character limitations and similar items determined by the commission to be too small and unnecessary for the disclosures required by this section. "Small promotional items" includes but is not limited to ashtrays, badges and badge holders, balloons, campaign buttons, coasters, combs, emery boards, erasers, glasses, key rings, letter openers, matchbooks, nail files, noisemakers, paper and plastic cups, pencils, pens, plastic tableware, 12-inch or shorter rulers and swizzle sticks.

**3. Enforcement.** A violation of this section may result in a penalty of no more than \$5,000. In assessing a penalty, the commission shall consider, among other things, how widely the communication was disseminated, whether the



violation was intentional, whether the violation occurred as the result of an error by a printer or other paid vendor and whether the communication conceals or misrepresents the identity of the person who financed it.

## **30-A M.R.S. § 2502. Campaign reports in municipal elections**

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**1. Reports by candidates.** A candidate for municipal office of a town or city with a population of 15,000 or more is governed by Title 21-A, sections 1001 to 1020-A, except that registrations and campaign finance reports must be filed with the municipal clerk instead of the Commission on Governmental Ethics and Election Practices. A town or city with a population of less than 15,000 may choose to be governed by Title 21-A, sections 1001 to 1020-A by vote of its legislative body at least 90 days before an election for office. A town or city that votes to adopt those provisions may revoke that decision, but it must do so at least 90 days before an election subject to those sections.

**A.** [2009, ch. 366, § 10 (RP).]

**2. Municipal referenda campaigns.** Municipal referenda campaign finance reporting is governed by Title 21-A, chapter 13, subchapter 4.

**3. Public access to records.** A town or city that receives registrations or reports pursuant to this section must keep them for 8 years.