



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

To: Commissioners

From: Commission Staff

Date: June 4, 2014

Re: Request for Investigation by Kevin Joyce concerning PAC Supporting Opponent

This memo provides you with background information concerning a request for investigation received yesterday. The request was submitted by Cumberland County Sheriff Kevin Joyce, who is running for re-election this year. In the past two weeks, a political action committee (PAC) spent nearly \$100,000 to oppose Sheriff Joyce and to support his primary election opponent, Michael Edes. The PAC paid for radio advertising, one mailer criticizing Sheriff Joyce, and one positive mailer describing Mike Edes' plan to "clean up" the sheriff's office.

Through a letter from his campaign manager, Sheriff Joyce requests that the Commission investigate the accuracy of the reported funding for the PAC and whether Mr. Edes cooperated with the PAC's spending. The PAC has reported receiving all of its funding from Brentwood Financial, LLC, a Florida company associated with a real estate developer, Michael Liberty.

Scheduling of Meeting

During the 28 days preceding an election, the Commission is legally required to meet within two business days of receiving a complaint. (21-A M.R.S.A. § 1002(1)) We received an electronic version of the request yesterday. Unfortunately, Sheriff Joyce and his campaign manager will be unable to attend today's meeting, which they regret.

Candidates

Sheriff Kevin Joyce was elected in 2010. He is enrolled in the Democratic Party. He is being challenged for the Democratic nomination by Michael T. Edes in the June 10, 2014 primary election. Mr. Edes is a former officer of the Maine State Police and a President of the Maine

State Troopers Association. He registered as a candidate with the Commission on January 17, 2014 and qualified for the ballot on March 10, 2014. No other candidates for Cumberland County Sheriff qualified for the primary or general election ballots.

Mr. Edes has a campaign website (<http://www.edescumberlandcountysheriff.com/>) and a Facebook page (<https://www.facebook.com/pages/Michael-Edes-for-Cumberland-County-Sheriff/579012102177142>).

Citizens for a Safe Cumberland County PAC

Citizens for a Safe Cumberland County registered as a PAC with the Commission on February 19, 2014. (see attached registration) At the time that it registered, it stated that its purpose was to support Michael Edes and oppose Kevin Joyce. Its treasurer is Christine Massengill of Scarborough, Maine. She certified that the PAC's registration was complete and accurate. She is a member of the Scarborough Board of Education, an elected position.

The PAC listed its principal officer as Brannon J. ("B.J.") Carter, apparently of Gray, Maine. His email address is with Mozido, a company based in Austin, Texas which develops software for making payments through mobile devices. Michael Liberty is described on the company website as its founder.

In the registration form, the PAC stated that the PAC had no decision-makers or fundraisers other than Ms. Massengill and Mr. Carter. Michael Liberty is not named on the registration in any capacity.

The PAC filed two campaign finance reports in February and April 2014 indicating that it had no financial activity. It filed a regular PAC report at the end of last week (attached), in which

- The PAC reported receiving a single cash contribution of \$100,000 dated May 16, 2014 from Brentwood Financial, LLC of Orlando, Florida.
- The PAC reported paying a political consulting firm \$85,282 on May 21, 2014 for radio ads and mailings supporting Michael Edes and opposing Kevin Joyce. The consulting

firm was Vital Impact Campaigns, LLC. This is an assumed name for Strategic Advocacy, LLC, managed by consultant Roy Lenardson.

- These \$85,282 in expenditures were also disclosed in an independent expenditure report filed by the PAC (attached). As part of the report, Ms. Massengill signed an affidavit stating that the expenditures were made independently and not in cooperation with any candidate.
- Also, the PAC reported paying \$7,500 in legal fees to Preti Flaherty on May 21, and roughly \$6,000 on other operating expenditures during May 16-22.

Relevant Law

\$750 limitation on contributions. In Maine, candidates for sheriff may receive up to \$750 in money, goods or services per election from a donor. (21-A M.R.S.A. §§ 1015(1) & (2))

Expenditures coordinated with the candidate. The \$750 limit applies to expenditures by others which were suggested by the candidate or with which the candidate cooperated:

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

21-A M.R.S.A. § 1015(5)

Committees authorized by the candidate. If a candidate has authorized a political committee to accept contributions on the candidate's behalf, the contributions to that committee are considered to be made to that candidate.¹

Donors to PACs. If an out-of-state entity (e.g., a for-profit company or non-profit advocacy organization) is merely contributing its own funds to a PAC, it does not need to

¹ Under 21-A M.R.S.A. § 1015(4), "[f]or the purpose of the limitations imposed by this section, contributions made to any political committee authorized by a candidate to accept contributions on the candidate's behalf are considered to be contributions made to that candidate. If the campaign activities of a political action committee within a calendar year primarily promote or support the nomination or election of a single candidate, contributions to the committee that were solicited by the candidate are considered to be contributions made to the candidate for purposes of the limitations in this section."

register as a PAC itself. (21-A M.R.S.A. § 1052(5)(B)(4)) So, if the only financial activity of Brentwood Financial, LLC to influence the Cumberland County Sheriff race was to contribute its own funds to the Citizens for a Safe Cumberland County PAC, Brentwood Financial, LLC would not qualify as a PAC and would not need to file reports. If, however, Brentwood Financial, LLC received contributions greater than \$5,000 for the purpose of influencing the sheriff's race, it would constitute a PAC and would need to file reports disclosing the sources of its funds used to influence the sheriff's race. (21-A M.R.S.A. § 1052(5)(A)(5))

Requests by the Kevin Joyce for Sheriff Campaign

Allegation that Mr. Edes consulted with the PAC on its communications. Sheriff Joyce requests that the Commission consider whether Mr. Edes or his campaign coordinated with the Citizens for a Safe Cumberland County PAC concerning its paid communications to voters. If Mr. Edes, his political committee or agents consulted with the PAC concerning its expenditures, those PAC expenditures would constitute an over-the-limit contribution to Mr. Edes.

Through a letter from campaign manager Dennis Newsom, the Joyce campaign makes the following points:

- According to the Joyce campaign, Mike Edes' Facebook page contained some language indicating that on Memorial Day (May 26), the PAC's treasurer Christine Massengill had put up campaign signs with Mike Edes. The Joyce campaign views that as evidence that Mr. Edes communicated with the PAC on its activities. Memorial Day was five days after the PAC paid Vital Impact Campaigns for the radio ads and mailers. According to Mr. Newsom, that language has since been removed from Mr. Edes' Facebook page.
- The Facebook page contains postings dated March 2 stating that Mike Edes' friend John Massengill, the husband of Christine Massengill, collected petition signatures to qualify Mr. Edes for the ballot at the Democratic caucus in South Portland. The March 2 post by Mike Edes invited his supporters to stop by the caucus and give his friend John Massengill a hand.

- The PAC's positive mailer concerning Mr. Edes contains seven photographs which are also used on Mr. Edes' campaign literature or Facebook page.
- The PAC's mailers were sent to Democratic voters in Cumberland County. Mr. Edes' campaign purchased a file of data concerning Democratic voters, but the PAC did not report purchasing any file of voter information.
- The PAC's positive mailer concerning Mr. Edes includes a photograph of a truck displaying Mr. Edes' campaign signs, which the Joyce campaign believes belongs to a supporter of Mr. Edes named James Fahey.

Request to review reported funding of PAC. The PAC reported receiving a single contribution of \$100,000 from Brentwood Financial, LLC, which is a company associated with Michael Liberty. In press accounts, Mr. Edes has described Michael Liberty as a childhood friend. In the view of the Joyce campaign, this is an unprecedented amount to be spent by an independent group in a sheriff's race and is not adequately explained by a childhood friendship between Mr. Liberty and Mr. Edes. The Joyce campaign urges the Commission to verify that Mr. Liberty or his businesses donated the funding to the PAC without any communication from Mr. Edes.

Options for the Commission

Under the Commission's rules, the next step is to decide whether to conduct any investigation in response to Sheriff Joyce's complaint. The Commission staff recommends that – at a minimum – you hear from both Mr. Edes and Ms. Massengill before deciding whether to investigate. On the issue of the flow of money, it strikes us as reasonable and necessary to ask some straightforward, preliminary questions at the meeting to verify that the PAC's decision-makers and financial activities have been accurately disclosed as required by law. We recommend inquiring into the decisions to form the PAC (Who? When? Why? Did Mr. Edes authorize the formation of the PAC?), what funds did Brentwood Financial, LLC use to make the contribution and did it receive funds from any other source to influence the campaign, and why did the PAC register in February when its first reported financial activity was May 16, 2014.

On the issue of cooperation with Mr. Edes, you should hear from both of them directly regarding when Mr. Edes first learned of the PAC, did he have any general or specific knowledge of the

PAC's activities, and did he or his political committee (including campaign manager) cooperate to any extent in the PAC's expenditures. Also, if he was aware of the PAC, did he and Ms. Massengill receive any advice from more experienced campaign professionals about staying independent of the PAC and did they execute that advice.

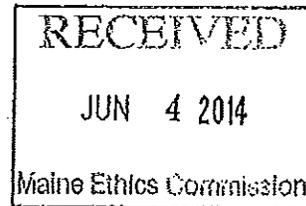
Depending on your satisfaction with the answers received, we see a few options for you:

- If you believe that the Joyce campaign has produced insufficient evidence that a violation may have occurred, you could vote to take no further action on Sheriff Joyce's request.
- To verify that the PAC has accurately reported the flow of money and that no other PAC reporting was legally required, you could request account statements of Brentwood Financial, LLC and the PAC for the period of 2/1/2014 to 5/30/2014.
- You could direct a more thorough investigation into cooperation between Mr. Edes and the PAC or the PAC's funders, including records of Vital Impact Campaigns, email communications, and other bank statements.

Thank you for your consideration of this memo.

June 3, 2014

Maine Ethics Commission
135 State House Station
Augusta, ME 04333



Attn: Jonathan Wayne

Dear Sir:

On behalf of the Joyce for Sheriff Campaign please accept this letter as a formal request for an ethics investigation into the activities of Citizens for a Safe Cumberland County PAC (CSCC/PAC).

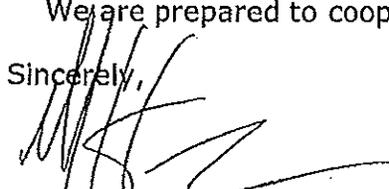
We seek to determine if the CSCC/PAC and the Campaign for Edes for Sheriff did in fact coordinate their respective campaigns. We therefore request:

1. A review of source funding for the CSCC/PAC to determine any improprieties as to candidate Michael Edes direct or indirect contributions to that entity.
2. A determination if the photographs used by the CSCC/PAC in their issue mailers are in fact the same photographs published in political literature distributed by the Campaign for Edes for Sheriff.
3. Clarification of the basis of CSCC/PAC expenditures that target the campaign for Sheriff Joyce for the years of 2014 and 2010, the latter being an election cycle when Sheriff Joyce had no challenger.
4. Clarification Democrat voter lists purchased by Edes for Sheriff Campaign were not transferred to CSCC/PAC for their expressed use in distributing mailers to Cumberland County Democratic voters.
5. Confirmation that the Treasurer for CSCC/ PAC, Christine Massengill was engaged in assisting candidate Michael Edes with campaign signs on Memorial Day.
6. Confirmation that Michael Liberty and or his corporate entities donated \$100,000.00 to CSCC/PAC without any direct or indirect communication from candidate Edes or his campaign.
7. Clarification of any coordination or direction, provided to an Edes campaign volunteer/ worker, who provided his personal vehicle for use in a photograph later incorporated in a mailer distributed by CSCC/PAC.
8. Clarification on how CSCC/PAC acquired a personal photograph of candidate Edes, depicted in his state police uniform posing in front of the US Capitol; the same photograph also published by the Edes campaign in their political advertisements.

9. Clarification as how CSCC/PAC acquired a private photograph, depicting candidate Edes posing with Congressman Michael Michaud, that was featured on candidate Edes personal Facebook account.

We are prepared to cooperate fully with your inquiry.

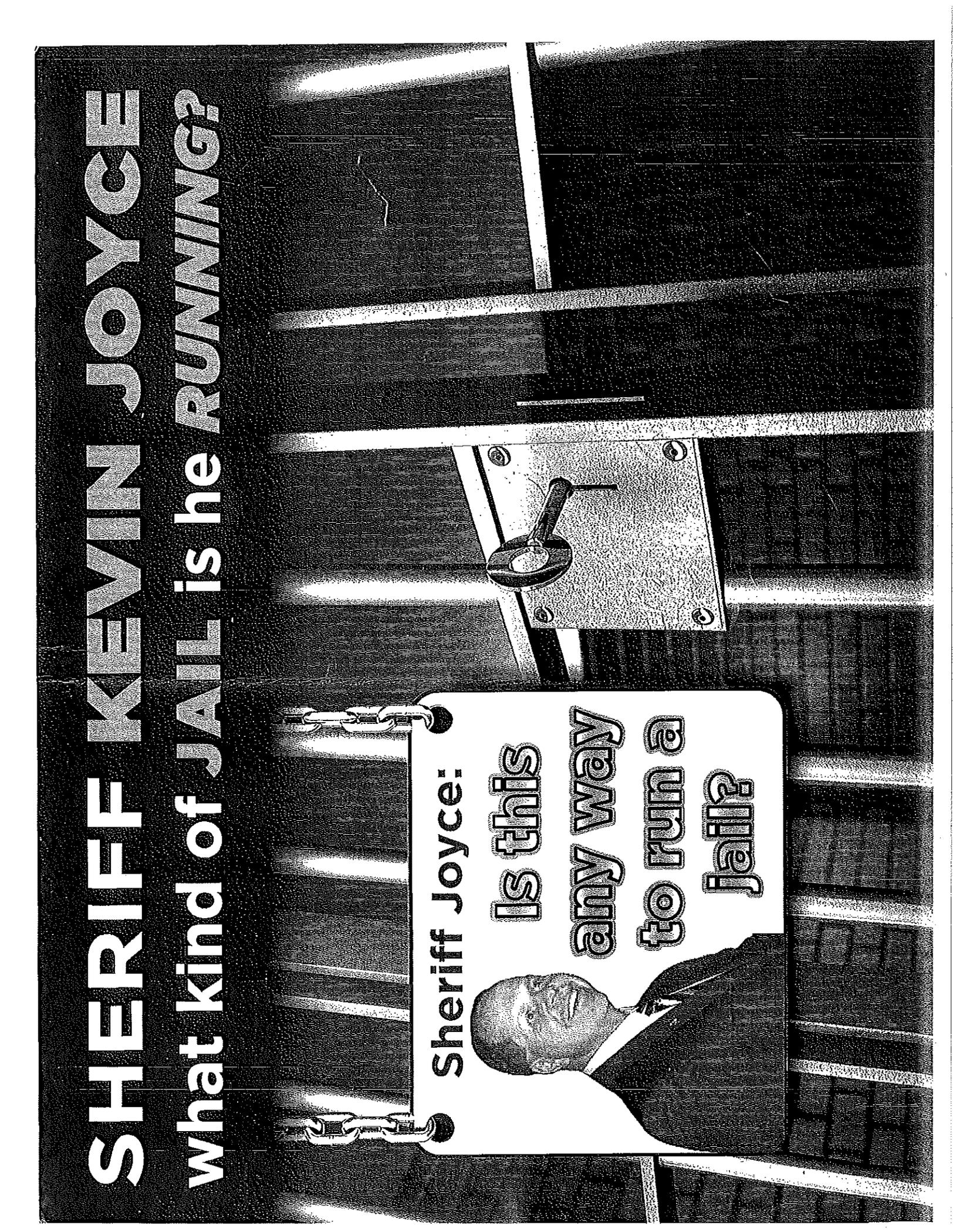
Sincerely,



Dennis Hersom
Campaign Manager Joyce for Sheriff
(207) 239-2830

SHERIFF KEVIN JOYCE

what kind of JAIL is he RUNNING?



Sheriff Joyce:

Is this
any way
to run a
jail?

What kind of justice does Sheriff Kevin Joyce deliver?

60 Mayberry Road
Gray, ME 04039

U.S. Postage
PAID
Portland, ME
Permit No. 508

*****AUTO**5-DIGIT 04092

Anne Hersom
31 Wildwood Cir
Westbrook ME 04092-3734



Inmate Tryst at Cumberland County Jail

Portland Press Herald, March 11, 2014

XXX Corrections officers failed to follow jail policy and left doors unlocked Saturday, allowing a female inmate in the maximum-security wing of the Cumberland County Jail to leave her cell and enter the cell of a male inmate to have sex with him.

XXX Saturday's incident was the second in two years in which inmates in maximum-security cells at the county jail left their cells to have sex.

XXX The two spent about 3 1/4 hours together in D'Angelo's cell and had consensual sex.

Cumberland County Jail Inmate Breaches Max Security Unit for Sex

XXX Italian then sneaked out of his cell, block and into Wilson's, where authorities believe the two had consensual sex.

XXX "Some lack of attention to detail" by the officers on duty at the time played a major role in the security breach.

Sheriff Joyce: Sheriff Joyce's idea of jail is wrong for Cumberland County.

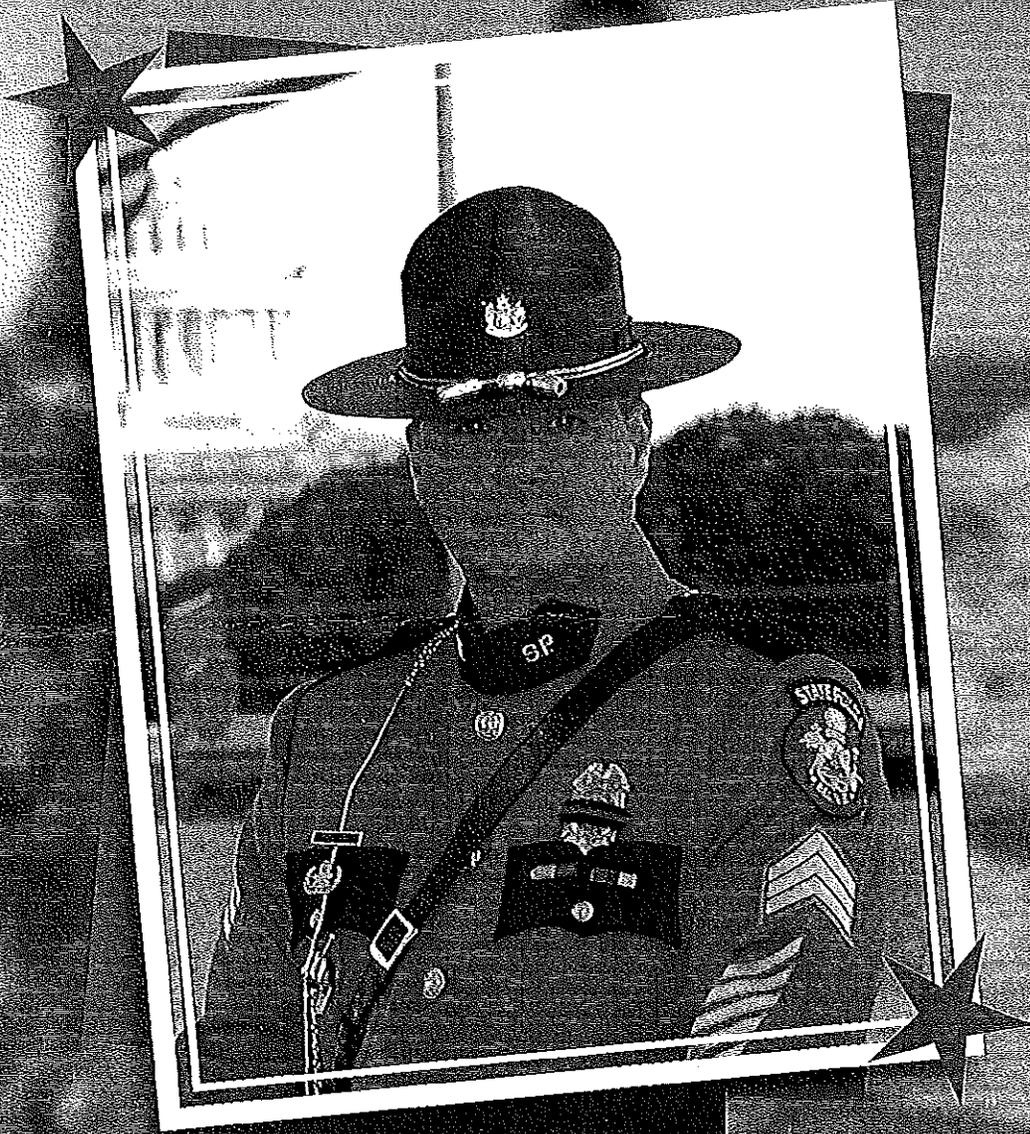


It's time to clean up the Cumberland County Sheriff's Office. Say NO to the chaos in Kevin Joyce's jail

Mike Edes



CUMBERLAND COUNTY SHERIFF



A Record of
SERVICE

A Commitment to
SAFETY

A Trusted Leader for Our
COMMUNITY



Mike Edes

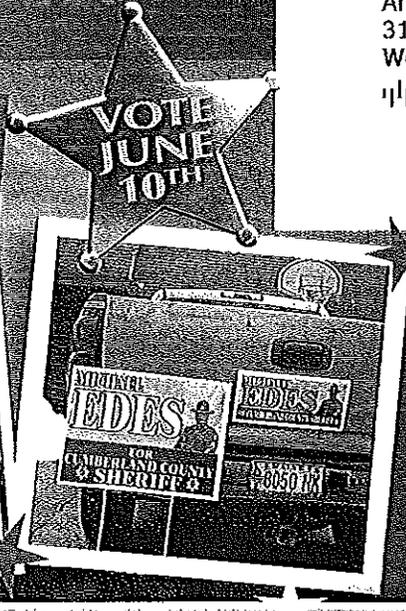
CUMBERLAND COUNTY
SHERIFF

Citizens for a Safe Cumberland County PAC
60 Mayberry Road
Gray, ME 04039

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Permit No. 603

*****AUTO**5-DIGIT 04092

Anne Hersom
31 Wildwood Cir
Westbrook ME 04092-3734



"Mike has been a tremendous leader for Maine's troopers and we know he will bring the same energy and passion to putting the Cumberland County Sheriff's Office back on track."

-Paul Gaspar,
Executive Director of the Maine
Association of Police

A Record of Service

- ★ Maine State Police (1986-2014)
- ★ Scarborough Police Department (1982-1986)
- ★ Cumberland Police Department (1979-1982)
- ★ Past Chairman - National Troopers Coalition (2009-2011)
- ★ President - Maine State Trooper Association (1998-2014)
- ★ Maine Police Emerald Society

A Commitment to Safety

- ★ Maine Criminal Justice Academy Instructor (1987-2014)
- ★ Maine State Police Bomb Team (2000-2006)
- ★ Citation of Bravery (2005)
- ★ Special Award for Commendation (1998)

A Trusted Leader for Our Community

- ★ Lifelong resident of Cumberland County
- ★ Cumberland Town Councilor (2013-present)
- ★ Falmouth/Cumberland Chamber of Commerce
- ★ Board Member - Jobs for Maine's Graduates (2006-2008)
- ★ Citation for Meritorious Service (1998)
- ★ Troop Commanders Award for Outstanding Service (1991)



NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE.

Paid for and authorized by Citizens for a Safe Cumberland County PAC, 60 Mayberry Road, Gray, ME 04039



RECEIVED
FEB. 19 2014
 COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES
Maine Ethics Commission

✓
CP

Mail: 135 State House Station, Augusta, Maine 04333
 Office: 45 Memorial Circle, 2nd floor, Augusta, Maine

Website: www.maine.gov/ethics
 Phone: 207-287-4179
 Fax: 207-287-6775

REGISTRATION: POLITICAL ACTION COMMITTEE

A political action committee must register with the Commission within 7 days of making expenditures to initiate or influence a campaign or election, including unpaid obligations, that total more than:

- \$1,500 for an organization whose major purpose is to influence candidate or ballot question elections, or
- \$5,000 for organizations which participate in candidate elections but whose major purpose is something other than influencing candidate elections.

Registration is not complete until the following additional documents have been submitted:

- Initial Campaign Finance Report. All contributions received, whether cash or in-kind, and all expenditures made from the beginning of the campaign must be reported. Be sure to include any expenditures associated with the collection of signatures, paid staff time, travel reimbursement, and fundraising.
- Acknowledgement of Responsibilities. The Treasurer, Principal Officer and any Decision-Makers must sign and return the statement within 10 days of the date of this registration.

Is this an amendment? Yes No

ALL SECTIONS OF THIS FORM MUST BE COMPLETED.

| COMMITTEE INFORMATION | |
|---|--|
| Committee name Citizens for a Safe Cumberland County PAC | Acronym |
| Mailing address 60 Mayberry Road | Phone 207-653-6115 |
| City, zip code Gray, ME 04039 | Fax |
| E-mail bj.carter@mozido.com | Website |
| ALTERNATE E-MAIL ADDRESSES | |
| To receive filing reminders and important information from the Commission. These addresses will not be posted online. | |
| 1. christine@congressassociates.com | 2. dbrooks@preti.com |
| TREASURER INFORMATION | |
| Cannot be the same as the Principal Officer. See Acknowledgement of Responsibilities for duties of Treasurer. | |
| Name Christine A. Massengill | Phone 207-510-6868 |
| Mailing address 4 Barnswallow Court | |
| City, zip code Scarborough, ME 04074 | E-mail christine@congressassociates.com |
| PRINCIPAL OFFICER INFORMATION | |
| Cannot be the same as the Treasurer. See Acknowledgement of Responsibilities for duties of Principal Officer. | |
| Name Brannon J. Carter | Phone 207-653-6115 |
| Mailing address 60 Mayberry Road | |
| City, zip code Gray, ME 04039 | E-mail bj.carter@mozido.com |

PRIMARY DECISION-MAKERS

List all persons, other than the Treasurer or Principal Officer, primarily responsible for making decisions for the PAC.

There are no Decision-Makers other than the Treasurer and Principal Officer.

| | |
|------|-------|
| Name | Phone |
|------|-------|

| |
|-----------------|
| Mailing address |
|-----------------|

| | |
|-----------------------|--------|
| City, state, zip code | E-mail |
|-----------------------|--------|

| | |
|------|-------|
| Name | Phone |
|------|-------|

| |
|-----------------|
| Mailing address |
|-----------------|

| | |
|-----------------------|--------|
| City, state, zip code | E-mail |
|-----------------------|--------|

PRIMARY FUNDRAISERS

List all persons, other than the Treasurer or Principal Officer, primarily responsible for fundraising for the PAC.

There are no Primary Fundraisers other than the Treasurer and Principal Officer.

| | |
|------|-------|
| Name | Phone |
|------|-------|

| |
|-----------------|
| Mailing address |
|-----------------|

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| City, state, zip code | E-mail |
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|------|-------|
| Name | Phone |
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|-----------------|
| Mailing address |
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| | |
|-----------------------|--------|
| City, state, zip code | E-mail |
|-----------------------|--------|

LEGISLATORS OR CANDIDATES WITH SIGNIFICANT ROLE IN PAC

List all Candidates or Legislators with a significant fundraising or decision-making role with the PAC.

No Candidates or Legislators have a significant fundraising or decision-making role with the PAC.

| | |
|-----------------------------|-------|
| Name and office sought/held | Phone |
|-----------------------------|-------|

| |
|-----------------|
| Mailing address |
|-----------------|

| | |
|-----------------------|--------|
| City, state, zip code | E-mail |
|-----------------------|--------|

| | |
|-----------------------------|-------|
| Name and office sought/held | Phone |
|-----------------------------|-------|

| |
|-----------------|
| Mailing Address |
|-----------------|

| | |
|-----------------------|--------|
| City, state, zip code | E-mail |
|-----------------------|--------|

FORM OF ORGANIZATION

Name the form or structure of organization, i.e., for-profit or non-profit corporation, voluntary association, partnership, membership organization, etc.

| | |
|--|---|
| Form of organization Voluntary Association | Date of origin/incorporation 2/6/14 |
|--|---|

SPONSOR ORGANIZATIONS

List all for-profit or non-profit corporations or other organizations that formed this committee. Use additional sheets as necessary.

This committee was not formed by a for-profit or non-profit corporation or other organization.

Name

Mailing address, city, state, zip code

Name

Mailing address, city, state, zip code

CAMPAIGN ACCOUNT INFORMATION

For the account into which contributions will be deposited and from which expenditures will be made.

Name of financial institution
TBD

Mailing address, city, state, zip code
TBD

Name of account
TBD

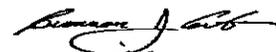
STATEMENT OF SUPPORT OR OPPOSITION

The committee must list the specific candidates or categories of candidates, referenda, initiated petitions, people's vetoes, or other campaigns that the committee supports or opposes. If the committee is formed to influence the election of a single candidate, the name of the candidate must be listed.

| | |
|---------|--|
| Support | Michael Edes / Cumberland County Sheriff Candidate |
| | |
| | |
| Oppose | Kevin Joyce / Cumberland County Sheriff Candidate |
| | |
| | |

SIGNATURE OF PRINCIPAL OFFICER OR TREASURER

The Treasurer, Principal Officer and any Decision-Makers must submit a signed Acknowledgement of Responsibilities.

| | |
|--|------------------------|
| Signature  | Title |
| Print name Brannon J Carter <i>Christine A. Massengill</i> | Date 2-12-14 |



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

2014 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

| COMMITTEE | | TREASURER |
|--|------------|--|
| CITIZENS FOR A SAFE CUMBERLAND COUNTY PAC 60 MAYBERRY RD GRAY, ME 04039 PHONE: (207) 653-6115 EMAIL: BJ.CARTER@MOZIODO.COM | | CHRISTINE A MASSENGILL 4 BARNSWALLOW COURT SCARBOROUGH, ME 04074 PHONE: (207) 510-6868 EMAIL: CHRISTINE@CONGRESSASSOCIATES.COM |
| REPORT | DUE DATE | REPORTING PERIOD |
| 11-DAY PRE-PRIMARY | 05/30/2014 | 04/01/2014 - 05/27/2014 |

FINANCIAL ACTIVITY SUMMARY

| RECEIPTS | TOTAL FOR PERIOD | TOTAL FOR YEAR |
|--|------------------|----------------|
| 1. CASH CONTRIBUTIONS (SCHEDULE A) | \$100,000.00 | \$100,000.00 |
| 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) | \$100,000.00 | \$100,000.00 |
| EXPENDITURES | | |
| 5. EXPENDITURES TO SUPPORT OR OPPOSE (SCHEDULE B) | \$85,282.50 | \$85,282.50 |
| 6. OPERATING EXPENDITURES (SCHEDULE B-1) | \$13,478.84 | \$13,478.84 |
| 7. LOAN REPAYMENTS (SCHEDULE C) | \$0.00 | \$0.00 |
| 8. TOTAL PAYMENTS (LINE 5 + 6 + 7) | \$98,761.34 | \$98,761.34 |
| CASH SUMMARY | | |
| 9. CASH BALANCE AT BEGINNING OF PERIOD | \$0.00 | |
| 10. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4) | \$100,000.00 | |
| 11. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8) | \$98,761.34 | |
| 12. CASH BALANCE AT END OF PERIOD | \$1,238.66 | |
| OTHER ACTIVITY | | |
| 13. IN-KIND CONTRIBUTIONS (SCHEDULE A-1) | \$0.00 | \$0.00 |
| 14. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C) | \$0.00 | |
| 15. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D) | \$0.00 | |

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

REPORT FILED BY: DUSTIN BROOKS
REPORT FILED ON: 05/30/2014
LAST MODIFIED: 05/30/2014
PRINTED: 06/03/2014
COMMITTEE ID: 7652

**SCHEDULE A
CASH CONTRIBUTIONS**

- 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.
- Cash contributions of \$50 or less can be added together and reported as a lump sum.
- Contributor Types

1 = Individual

9 = Candidate / Candidate Committee

2 = Candidate/ Spouse/ Domestic Partner

10 = General Treasury Transfer

3 = Commercial 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 | OCCUPATION AND EMPLOYER | TYPE | AMOUNT |
|---------------------------------|---|-------------------------|------|---------------------|
| 5/16/2014 | BRENTWOOD FINANCIAL, LLC 5036 DR. PHILLIPS BLVD. #314 ORLANDO, FL 32819 | | 3 | \$100,000.00 |
| TOTAL CASH CONTRIBUTIONS | | | | \$100,000.00 |

**SCHEDULE B
EXPENDITURES TO SUPPORT OR OPPOSE**

| EXPENDITURE TYPES | | | | |
|---------------------|---|--|--|-------------|
| CNS | Campaign consultants | POL | Polling and survey research | |
| CON | Contribution to other candidate, party, committee | POS | Postage for U.S. Mail and mail box fees | |
| EQP | Equipment (office machines, furniture, cell phones, etc.) | PRO | Other professional services | |
| FND | Fundraising events | PRT | Print media ads only (newspapers, magazines, etc.) | |
| FOD | Food for campaign events, volunteers | RAD | Radio ads, production costs | |
| LIT | Print and graphics (flyers, signs, palmcards, t-shirts, etc.) | SAL | Campaign workers' salaries and personnel costs | |
| MHS | Mail house (all services purchased) | TRV | Travel (fuel, mileage, lodging, etc.) | |
| OFF | Office rent, utilities, phone and internet services, supplies | TVN | TV or cable ads, production costs | |
| OTH | Other | WEB | Website design, registration, hosting, maintenance, etc. | |
| PHO | Phone banks, automated telephone calls | | | |
| DATE OF EXPENDITURE | PAYEE | REMARK | TYPE | AMOUNT |
| 5/21/2014 | PORTLAND RADIO GROUP 420 WESTERN AVENUE PORTLAND, ME 04106 | RADIO AIRTIME ON WMGX, WPOR & WCLZ PURCHASED VIA VITAL IMPACT CAMPAIGNS, LLC PAYMENT OF \$6,532.25 TO SUPPORT: MR. MICHAEL T EDES. PARTY: DEMOCRATIC. OFFICE: SHERIFF. ELECTION YEAR: 2014 PAYMENT OF \$6,532.25 TO OPPOSE: KEVIN J JOYCE. PARTY: DEMOCRATIC. OFFICE: SHERIFF. ELECTION YEAR: 2014 | RAD | \$13,064.50 |
| 5/21/2014 | TOWNSQUARE MEDIA PORTLAND ONE CITY CENTER PORTLAND, ME 04101 | RADIO AIRTIME ON WJBQ, WCYY & WBLM PURCHASED VIA VITAL IMPACT CAMPAIGNS, LLC PAYMENT OF \$10,448.63 TO SUPPORT: MR. MICHAEL T EDES. PARTY: DEMOCRATIC. OFFICE: SHERIFF. ELECTION YEAR: 2014 PAYMENT OF \$10,448.62 TO OPPOSE: KEVIN J JOYCE. PARTY: DEMOCRATIC. OFFICE: SHERIFF. ELECTION YEAR: 2014 | RAD | \$20,897.25 |
| 5/21/2014 | U.S. POSTMASTER 79 POSTAL SERVICE WAY SCARBOROUGH, ME 04074 | POSTAGE FOR MAILINGS PAYMENT OF \$16,479.63 TO SUPPORT: MR. MICHAEL T EDES. PARTY: DEMOCRATIC. OFFICE: SHERIFF. ELECTION YEAR: 2014 PAYMENT OF \$11,355.37 TO OPPOSE: KEVIN J JOYCE. PARTY: DEMOCRATIC. OFFICE: SHERIFF. ELECTION YEAR: 2010 | POS | \$27,835.00 |
| 5/21/2014 | VITAL IMPACT CAMPAIGNS, LLC PO BOX 9546 PORTLAND, ME 04112 | FOR MAILINGS PAYMENT OF \$10,267.57 TO SUPPORT: MR. MICHAEL T EDES. PARTY: DEMOCRATIC. OFFICE: SHERIFF. ELECTION YEAR: 2014 PAYMENT OF \$7,074.93 TO OPPOSE: KEVIN J JOYCE. PARTY: DEMOCRATIC. OFFICE: SHERIFF. ELECTION YEAR: 2010 | MHS | \$17,342.50 |

| | | | | |
|---|---|--|-----|-------------|
| 5/21/2014 | VITAL IMPACT CAMPAIGNS, LLC PO BOX 9546 PORTLAND, ME 04112 | RADIO PRODUCTION AND PROCUREMENT COSTS. PAYMENT OF \$3,071.63 TO SUPPORT: MR. MICHAEL T EDES. PARTY: DEMOCRATIC. OFFICE: SHERIFF. ELECTION YEAR: 2014 PAYMENT OF \$3,071.62 TO OPPOSE: KEVIN J JOYCE. PARTY: DEMOCRATIC. OFFICE: SHERIFF. ELECTION YEAR: 2014 | RAD | \$6,143.25 |
| TOTAL EXPENDITURES TO SUPPORT OR OPPOSE: | | | | \$85,282.50 |

**SCHEDULE B-1
OPERATING EXPENDITURES**

| EXPENDITURES TYPES | | | | |
|--------------------|---|-----|--|--|
| CNS | Campaign consultants | POL | Polling and survey research | |
| CON | Contribution to other candidate, party, committee | POS | Postage for U.S. Mail and mail box fees | |
| EQP | Equipment (office machines, furniture, cell phones, etc.) | PRO | Other professional services | |
| FND | Fundraising events | PRT | Print media ads only (newspapers, magazines, etc.) | |
| FOD | Food for campaign events, volunteers | RAD | Radio ads, production costs | |
| LIT | Print and graphics (flyers, signs, palmcards, t-shirts, etc.) | SAL | Campaign workers' salaries and personnel costs | |
| MHS | Mail house (all services purchased) | TRV | Travel (fuel, mileage, lodging, etc.) | |
| OFF | Office rent, utilities, phone and internet services, supplies | TVN | TV or cable ads, production costs | |
| OTH | Other | WEB | Website design, registration, hosting, maintenance, etc. | |
| PHO | Phone banks, automated telephone calls | | | |

| DATE OF EXPENDITURE | PAYEE | REMARK | TYPE | AMOUNT |
|-------------------------------------|--|-------------------------------|------|--------------------|
| 5/21/2014 | MAINE REVENUE SERVICE SALE, FUEL & SPECIAL TAX DEIVISION PO BOX 1060 AUGUSTA, ME 04332 | SALES TAX ON MAIL PRODUCTION. | OTH | \$953.84 |
| 5/22/2014 | BANGOR SAVINGS BANK 241 US ROUTE 1 SCARBOROUGH, ME 04074 | WIRE TRANSFER FEE. | OTH | \$25.00 |
| 5/22/2014 | PRETI FLAHERTY PO BOX 9546 PORTLAND, ME 04112 | LEGAL FEES | OTH | \$7,500.00 |
| 5/22/2014 | VITAL IMPACT CAMPAIGNS, LLC PO BOX 9546 PORTLAND, ME 04112 | CONSULTING FEES | CNS | \$5,000.00 |
| TOTAL OPERATING EXPENDITURES | | | | \$13,478.84 |



RECEIVED
MAY 23 2014
 Maine Ethics Commission

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

INDEPENDENT EXPENDITURE REPORT – 2014 PRIMARY ELECTION

Name of Person/Committee Making Expenditure(s) Citizens for a Safe Cumberland County PAC
 Mailing Address 60 Mayberry Road
 City, Zip Code Gray, ME 04039 Telephone 207-653-6115

Please check the appropriate box for the report you are filing and complete the notarized affidavit and attached schedules. Reports must be filed on Saturday or Sunday if that is when they are due by faxing the report to the Commission (287-6775). The Commission must receive the signed original report within 5 days after the fax was received.

Check here if this report is an amendment to a previously filed report? Date of original report: _____

INDEPENDENT EXPENDITURES AGGREGATING OVER \$250 MADE FROM APRIL 11 THROUGH JUNE 10, 2014

Independent expenditures made from April 11 through June 10, 2014 that total more than \$250 per candidate must be reported within 2 calendar days of making the expenditure.
 Report of Independent Expenditure over \$250 per Candidate

INDEPENDENT EXPENDITURES OVER \$100 MADE AFTER MAY 28, 2014

Independent expenditures made after May 28, 2014 that total more than \$100 per candidate must be reported within one calendar day of making the expenditure.
 Report of Independent Expenditure over \$100 per Candidate

OTHER INDEPENDENT EXPENDITURES

| | |
|---------------------|---|
| Report (select one) | <input type="checkbox"/> 11-Day Pre-Election Report |
| Due Date | May 30, 2014 by 5:00 p.m. |
| What Gets Reported | Expenditures in the aggregate totalling more than \$100 but not more than \$250 made from April 11 through May 27, 2014 |

I CERTIFY THAT THE INFORMATION IN THIS REPORT IS TRUE, CORRECT AND COMPLETE.

Christine B. Mason
 Signature of PAC or Party Treasurer, or
 Other Authorized Person Making Expenditure(s)

5/22/14
 Date

**Schedule B-IE-1
CANDIDATE(S) SUPPORTED/OPPOSED**

- Please list all candidates that were the subjects of Independent expenditures.
- If more than one candidate was the subject of the expenditure, allocate the expenditure among the candidates.

| Office sought by candidate (including district # or county) | Candidate's name | Indicate whether expenditure was made in support of or in opposition to the candidate | Amount expended this reporting period for each candidate |
|--|------------------|---|--|
| Cumberland County Sheriff | Michael Edes | Support | 46,799.70 |
| Cumberland County Sheriff | Kevin Joyce | Oppose | 38,482.80 |
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| Total expenditures for all candidates this reporting period: <i>This amount should equal the total independent expenditures listed on Schedule B-IE-2, Line C.</i> ⇒ | | | \$85,282.50 |

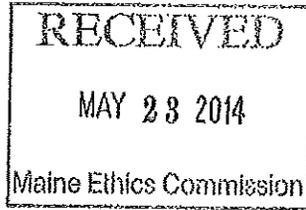
Schedule B-IE-2

PAYMENTS AND OBLIGATIONS

- Please indicate the date, payee, expenditure type, and amount of each expenditure.
- If you are reporting an agreement or obligation to make a future payment, please check (✓) the box next to the expenditure type.

| Expenditure Types | | | |
|-------------------|--|-----|--|
| LIT | Printing and graphics (flyers, signs, palmcards, etc.) | PRT | Print media ads only (newspapers, magazines) |
| MHS | Mail house (all services purchased) | RAD | Radio ads, production costs |
| PHO | Phone banks, automated telephone calls | TVN | TV or cable ads, production costs |
| POL | Polling and research survey | WEB | Website design, registration, hosting, maintenance, etc. |
| POS | Postage for U.S. Mail and mail box fees | OTH | Other (include description) |

| Date of expenditure | Payee, address, zip code | Expenditure type | <input checked="" type="checkbox"/> | Amount |
|---|---|------------------|-------------------------------------|-------------|
| 5/21 | Vital Impact Campaigns, LLC PO Box 9546 Portland, ME 04112 | RAD | X | \$40,105 |
| 5/21 | Vital Impact Campaigns, LLC PO Box 9546 Portland, ME 04112 | MHS | X | \$17,342.50 |
| 5/21 | U.S. Postmaster 79 Postal Service Way Scarborough, ME 04074 | POS | X | \$27,835 |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| A. Expenditures for this page => | | | | \$85,282.50 |
| B. Total for all other Schedule B-IE-2 pages (if any) => | | | | \$0 |
| C. Total independent expenditures for this reporting period (A+B). <i>This amount should equal the total amount for all candidates listed on Schedule B-IE-1.</i> => | | | | \$85,282.50 |



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

INDEPENDENT EXPENDITURE REPORT – PRIMARY ELECTION

AFFIDAVIT

STATE OF Maine

COUNTY OF Cumberland

I, Christine Massengill, being duly sworn, attest that I made each of the expenditures listed in the attached report independently, and not in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate, authorized committee or agent of a candidate in a race affected by any expenditure listed in this report.

Christine A. Massengill
Signature of Affiant

Sworn to before me, this 22 day of May 2014

Carol A. Kenzie

(Notary Public/Attorney at Law) CAROL A. KENNIE
Notary Public, Maine
My Commission Expires February 6, 2017

My commission expires: _____

21-A MRSA §1015. LIMITATIONS ON CONTRIBUTIONS AND EXPENDITURES

1. Individuals. An individual may not make contributions to a candidate in support of the candidacy of one person aggregating more than \$1,500 in any election for a gubernatorial candidate, more than \$350 for a legislative candidate, more than \$350 for a candidate for municipal office and beginning January 1, 2012 more than \$750 for a candidate for municipal office or more than \$750 in any election for any other candidate. This limitation does not apply to contributions in support of a candidate by that candidate or that candidate's spouse or domestic partner. Beginning December 1, 2010, contribution limits in accordance with this subsection are adjusted every 2 years based on the Consumer Price Index as reported by the United States Department of Labor, Bureau of Labor Statistics and rounded to the nearest amount divisible by \$25. The commission shall post the current contribution limit and the amount of the next adjustment and the date that it will become effective on its publicly accessible website and include this information with any publication to be used as a guide for candidates.

2. Committees; corporations; associations. A political committee, political action committee, other committee, firm, partnership, corporation, association or organization may not make contributions to a candidate in support of the candidacy of one person aggregating more than \$1,500 in any election for a gubernatorial candidate, more than \$350 for a legislative candidate, more than \$350 for a candidate for municipal office and beginning January 1, 2012 more than \$750 for a candidate for municipal office or more than \$750 in any election for any other candidate. Beginning December 1, 2010, contribution limits in accordance with this subsection are adjusted every 2 years based on the Consumer Price Index as reported by the United States Department of Labor, Bureau of Labor Statistics and rounded to the nearest amount divisible by \$25. The commission shall post the current contribution limit and the amount of the next adjustment and the date that it will become effective on its publicly accessible website and include this information with any publication to be used as a guide for candidates.

3. Aggregate contributions. No individual may make contributions to candidates aggregating more than \$25,000 in any calendar year. This limitation does not apply to contributions in support of a candidate by that candidate or that candidate's spouse or domestic partner.

4. Political committees; intermediaries. For the purpose of the limitations imposed by this section, contributions made to any political committee authorized by a candidate to accept contributions on the candidate's behalf are considered to be contributions made to that candidate. If the campaign activities of a political action committee within a calendar year primarily promote or support the nomination or election of a single

candidate, contributions to the committee that were solicited by the candidate are considered to be contributions made to the candidate for purposes of the limitations in this section. For purposes of this subsection, solicitation of contributions includes but is not limited to the candidate's appearing at a fundraising event organized by or on behalf of the political action committee or suggesting that a donor make a contribution to that committee.

For the purposes of the limitations imposed by this section, all contributions made by a person, either directly or indirectly, on behalf of a particular candidate, that are in any way earmarked or otherwise directed through an intermediary or conduit to the candidate are considered to be contributions from that person to the candidate. The intermediary or conduit shall report the original source and the intended recipient of the contribution to the commission and to the intended recipient.

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

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

...

**FLORIDA DEPARTMENT OF STATE
DIVISION OF CORPORATIONS****Detail by Entity Name****Florida Limited Liability Company**

BRENTWOOD FINANCIAL, LLC

Filing Information

| | |
|------------------------|--------------|
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| Effective Date | 11/08/2011 |

Principal Address

5036 Dr Phillips Blvd
#314
Orlando, FL 32819

Changed: 04/16/2013

Mailing Address

5036 Dr Phillips Blvd
#314
Orlando, FL 32819

Changed: 04/16/2013

Registered Agent Name & Address

ABBASS, BRITTANY S
5036 Dr Phillips Blvd
#314
Orlando, FL 32819

Address Changed: 04/16/2013

Authorized Person(s) Detail**Name & Address**

Title MGR

LIBERTY, MICHAEL A
5036 Dr. Phillips Blvd

#314

Orlando, FL 32819

Title MGR

ABBASS, BRITTANY S

5036 Dr Phillips Blvd

#314

Orlando, FL 32819

Annual Reports

| Report Year | Filed Date |
|--------------------|-------------------|
| 2012 | 03/16/2012 |
| 2013 | 04/16/2013 |
| 2014 | 03/31/2014 |

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