

Agenda

Item #8



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

To: Commissioners

From: Jonathan Wayne, Executive Director  
Beth Hudson, Candidate Registrar

Date: June 20, 2014

Re: Complaint against Joanne Karkos, Candidate for Franklin County Treasurer

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In the June 10, 2014 primary election, Joanne Karkos was a write-in candidate in the Republican primary for Treasurer of Franklin County. No other Republican candidate qualified for the primary election ballot. She is expected to be the Republican nominee for County Treasurer in the general election, but the election results are unconfirmed, as of today. Her Democratic opponent, Pamela Prodan, has filed a complaint against her.

**Exemption Statement filed by Ms. Karkos**

Candidates for county and municipal office may file a sworn statement that they will not accept contributions, make expenditures, or incur obligations associated with their candidacy. Once that is filed, they are not required to appoint a campaign treasurer or file campaign finance reports. This "exempt" status reduces the administrative burden of running for office.

Ms. Karkos registered as a candidate with the Ethics Commission on May 7, 2014. When she registered, she completed Part 6 of the Registration form, which is a statement for county candidates to request the exemption from filing reports. (*See Ms. Karkos' May 7, 2014 registration statement, attached*) The language in the exemption statement is as follows:

STATE OF ELIGIBILITY FOR A REPORTING EXEMPTION: I, the undersigned, swear or affirm that I will not accept contributions, make expenditures or incur obligations associated with my candidacy.

Later in May, Ms. Karkos decided to engage in some paid activities that would increase voters' awareness of her write-in candidacy in the June 10 primary election. (She needed 300 write-in votes on June 10 to become her party's nominee.)

- On May 30, she ordered signs from the Bangor Letter Shop, incurring an obligation to pay for them.
- She purchased ads in two sister newspapers, the Franklin Journal and Livermore Falls Advertiser, for \$39.72 each. The ads ran on June 4 and 6. The Franklin Journal and the candidate confirmed that the candidate paid for both of these ads with a personal credit card. The date of payment was June 12 (confirmed by both Ms. Karkos and the newspaper).

When the first campaign finance reporting deadline for county candidates (May 30, 2014) passed, Ms. Karkos did not file a campaign finance report. The Commission staff was not expecting a report from her, because she had requested the reporting exemption.

On Friday, June 6, 2014, the Ethics Commission staff became aware that Ms. Karkos had ordered professionally printed campaign signs because her opponent, Pamela Prodan, notified us by telephone. That same day (June 6), Candidate Registrar Elizabeth Hudson called Ms. Karkos who confirmed that she had ordered and received the signs from the Bangor Letter Shop, but had not yet paid for them. When asked about the exemption statement, Ms. Karkos said that she did not understand that using personal funds for her campaign was considered accepting a contribution or making an expenditure for her campaign. She has since submitted a written explanation of this, through a letter dated June 18, 2014 (attached).

The Commission staff clarified for Ms. Karkos that she would need to revoke her exemption request and begin filing campaign finance reports. On June 9, 2014, the

Commission staff mailed a packet of forms to Ms. Karkos, which she completed the next day. On June 11, the Commission received an amended registration form (attached) intended to revoke the exemption.

Also, on June 11, we received a paper campaign finance report that had been due May 30, 2014 (filed 12 days late). The end-date of the report was May 27, 2014. The report contained only one item: an in-kind contribution dated May 7, 2014 of paper and ink from the candidate which was attributed a value of \$5.00. A printout of this report from the Commission's e-filing website is attached.

#### **Request for Investigation by Pamela Prodan**

On June 9, 2014 (the day before the primary election), the Commission received Pamela Prodan's complaint that Ms. Karkos had made expenditures for her campaign, even though she had filed for the reporting exemption. In her complaint, Ms. Prodan also mentioned she was aware that a local Republican candidate, Tom Skolfield, had mailed flyers which were promoting Ms. Karkos's candidacy. Ms. Prodan stated she believed Mr. Karkos had handed out small printed notes on paper that advocated for her write-in candidacy. In her complaint, Ms. Prodan expressed concern that Ms. Karkos had intentionally avoided public disclosure of her campaign expenditures. She requested an investigation and encouraged the Commission to consider any civil penalties that could apply.

#### **Relevant Law**

Under 21-A M.R.S. § 1017(7-A) candidates for county and municipal office may file a written statement with the Commission or municipal clerk that the candidate will not personally accept contributions, make expenditures, or incur obligations associated with their candidacy. (*See attached statute.*) The statement must be sworn and notarized. An "exempt" candidate is not required to appoint a treasurer and file campaign finance reports.

The statute permits the candidate to revoke the exemption, in order to receive or spend money for their campaign. The candidate may not accept contributions, incur obligations,

or make expenditures before the filing of a revocation notice. The statute allows for a civil penalty for failure to file a timely revocation notice.

### **Gathering of Preliminary Factual Information by Commission Staff**

Following receipt of Ms. Prodan's complaint, Candidate Registrar Beth Hudson gathered the following preliminary factual information:

- Ms. Karkos used paper and ink from home to make note cards to pass out to voters prior to the primary election. Because these cards were raised in the complaint, Ms. Karkos has reported this use of personal materials as an in-kind contribution dated May 7, 2014 with a value of \$5.00.
- As mentioned above, on May 30<sup>th</sup> Ms. Karkos ordered signs from the Bangor Letter Shop (bookkeeping records of the shop are attached). The handwritten notes at the bottom of the work order seem to indicate that the shop sent a proof to the candidate on 5/29/2014, and that the candidate accepted the proof on 5/30/2014 and placed the order on that date. The shop issued an invoice dated June 3, 2014. In her letter, Ms. Karkos states that she paid the shop on June 11, 2014.
- Also mentioned above, Ms. Karkos used her personal credit card to pay for two newspaper ads that ran on June 4 and 6 for \$39.72 each. Both Ms. Karkos and the Franklin Journal confirm that the payment was made on June 12, 2014.
- On June 1<sup>st</sup>, Mr. Skolfield wrote a note asking voters in Weld to write in Ms. Karkos's name. He mailed the notes the week before the primary election. Mr. Skolfield has explained the circumstances of the notes in an email to Beth Hudson (attached), and has stated that the candidate was unaware of the expenditure.
- On June 3<sup>rd</sup> (before the filing of the complaint), the Commission received an Independent Expenditure Report from the Raye for Congress campaign (attached) stating that it had paid for a radio ad in support of Joanne Karkos for Franklin County Treasurer independently of the candidate.

### **Campaign Finance Report Filed by Joanne Karkos**

On June 11, 2014, Ms. Karkos filed a campaign finance report 12 days late. In that report, Ms. Karkos reported the May 7, 2014 in-kind contribution of materials for cards. The signs and newspaper advertisements were ordered after the end-date of the report (May 27, 2014). Ms. Karkos intends to report these costs in the next report filed in July 2014. She was apparently not required to report the radio ad and notes by Tom Skolfield, because she did not cooperate with these expenditures.

### **Responses by Joanne Karkos**

In gathering preliminary information concerning paid campaign activity, Candidate Registrar Beth Hudson has interviewed Joanne Karkos several times. The candidate has been cooperative and responsive on all requests. Information gathered from other sources has corroborated the information that she has provided to Commission staff.

Ms. Karkos concedes that she made a mistake concerning the reporting exemption, which she attributes to being “ignorant about the political process.” She has asked the right questions in order to fulfill her financial reporting obligations for the duration of the year.

### **Staff Recommendation**

#### Incurring on Obligation before Revoking Exemption Statement

Once Joanne Karkos filed the May 7, 2009 statement that she was eligible for the reporting exemption, 21-A M.R.S.A. § 1017(7-A)(B) required her to revoke the exemption before incurring any obligations or making any expenditures. The Commission staff recommends finding that Ms. Karkos violated 21-A M.R.S.A. § 1017(7-A)(B) by incurring an obligation to the Bangor Letter Shop before revoking the statement of eligibility for the exemption.

The statute contemplates the assessment of a civil penalty, which you may wish to consider. Based on Ms. Karkos’ responses to the preliminary investigation and

explanation of confusion, the staff questions whether any penalty is necessary. If you would like to proceed with a penalty, we can discuss the calculation at the meeting. The method of calculating the penalty is not clearly laid out in the statute.

#### Late Report

Ms. Karkos filed the May 30 campaign finance report twelve days late on June 11, 2014. It contained only one transaction: an in-kind contribution of personal paper and ink attributed to have a value of \$5.00.

This late filing has been handled through the Commission staff's usual procedures. We have notified her that the report is late, by letter dated June 10 (attached). Any other report filed late this year will result in a higher penalty. The preliminary penalty for the late report is automatically waived, because the penalty is less than \$10.

If you believe any further investigation is necessary, we would be pleased to pursue it. Thank you for your consideration of this memo.

## 21-A MRSA § 1017(7-A).

**7-A. Reporting exemption.** A candidate seeking election to a county or municipal office is exempt from reporting as provided by this subsection.

- A. A candidate seeking election to a county or municipal office may, at the time the candidate registers under section 1013-A, notify the commission that the candidate and the candidate's agents, if any, will not personally accept contributions, make expenditures or incur obligations associated with that candidate's candidacy. The notification must be sworn and notarized. A candidate who provides this notice to the commission is not required to appoint a treasurer and is not subject to the filing requirements of this subchapter if the statement is true.
- B. The notice provided to the commission under paragraph A may be revoked. Prior to revocation, the candidate must appoint a treasurer. The candidate may not accept contributions, make expenditures or incur obligations before the appointment of a treasurer and the filing of a revocation notice are accomplished. A revocation notice must be in the form of an amended registration, which must be filed with the commission no later than 10 days after the appointment of a treasurer. The candidate and the candidate's treasurer, as of the date the revocation notice is filed with the commission, may accept contributions, make expenditures and incur obligations associated with the candidate's candidacy. Any candidate who fails to file a timely revocation notice is subject to the penalties prescribed in section 1020-A, subsection 4-A, up to a maximum of \$5,000. Lateness is calculated from the day a contribution is received, an expenditure is made or an obligation is incurred, whichever is earliest.

## 21-A MRS § 1020-A. FAILURE TO FILE ON TIME

**1. Registration.** A candidate that fails to register the name of a candidate, treasurer or political committee with the commission within the time allowed by section 1013-A, subsection 1 may be assessed a forfeiture of \$10. The commission shall determine whether a registration satisfies the requirements for timely filing under section 1013-A, subsection 1.

**2. Campaign finance reports.** A campaign finance report is not timely filed unless a properly signed or electronically submitted copy of the report, substantially conforming to the disclosure requirements of this subchapter, is received by the commission by 11:59 p.m. on the date it is due. Except as provided in subsection 7, the commission shall determine whether a report satisfies the requirements for timely filing. The commission may waive a penalty in whole or in part if the commission determines that the penalty is disproportionate to the size of the candidate's campaign, the level of experience of the candidate, treasurer or campaign staff or the harm suffered by the public from the late disclosure. The commission may waive the penalty in whole or in part if the commission determines the failure to file a timely report was due to mitigating circumstances. For purposes of this section, "mitigating circumstances" means:

- A. A valid emergency determined by the commission, in the interest of the sound administration of justice, to warrant the waiver of the penalty in whole or in part; [1999, c. 729, §5 (AMD).]
- B. An error by the commission staff; [1999, c. 729, §5 (AMD).]
- C. Failure to receive notice of the filing deadline; or [1999, c. 729, §5 (AMD).]
- D. Other circumstances determined by the commission that warrant mitigation of the penalty, based upon relevant evidence presented that a bona fide effort was made to file the report in accordance with the statutory requirements, including, but not limited to, unexplained delays in postal service or interruptions in Internet service. [2009, c. 190, Pt. A, §13 (AMD).]

**3. Municipal campaign finance reports.** Municipal campaign finance reports must be filed, subject to all the provisions of this subchapter, with the municipal clerk on forms prescribed by the Commission on Governmental Ethics and Election Practices. The municipal clerk shall send any notice of lateness required by subsection 6 and shall notify the commission of any late reports subject to a penalty.

### 4. Basis for penalties.

[ 2001, c. 470, §7 (AMD); T. 21-A, §1020-A, sub-§4 (RP) .]

**4-A. Basis for penalties.** The penalty for late filing of a report required under this subchapter is a percentage of the total contributions or expenditures for the filing

period, whichever is greater, multiplied by the number of calendar days late, as follows:

- A. For the first violation, 1%; [2001, c. 714, Pt. PP, §1 (NEW); 2001, c. 714, Pt. PP, §2 (AFF).]
- B. For the 2nd violation, 3%; and [2001, c. 714, Pt. PP, §1 (NEW); 2001, c. 714, Pt. PP, §2 (AFF).]
- C. For the 3rd and subsequent violations, 5%. [2001, c. 714, Pt. PP, §1 (NEW); 2001, c. 714, Pt. PP, §2 (AFF).]

Any penalty of less than \$10 is waived.

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

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

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

## **5. Maximum penalties.**

[ 2001, c. 470, §8 (AMD); T. 21-A, §1020-A, sub-§5 (RP) .]

**5-A. Maximum penalties.** Penalties assessed under this subchapter may not exceed:

- A. Five thousand dollars for reports required under section 1017, subsection 2, paragraph B, C, D, E or H; section 1017, subsection 3-A, paragraph B, C, D, D-1 or F; and section 1017, subsection 4; [2011, c. 389, §23 (AMD).]
- A-1. Five thousand dollars for reports required under section 1019-B, subsection 4, except that if the financial activity reported late exceeds \$50,000, the maximum penalty is 1/5 of the amount reported late; [2011, c. 389, §24 (NEW).]
- B. Five thousand dollars for state party committee reports required under section 1017-A, subsection 4-A, paragraphs A, B, C and E, except that if the financial activity reported late exceeds \$50,000, the maximum penalty is 1/5 of the amount reported late; [2011, c. 389, §25 (AMD).]
- C. One thousand dollars for reports required under section 1017, subsection 2, paragraphs A and F and section 1017, subsection 3-A, paragraphs A and E; or [2011, c. 558, §4 (AMD).]
- D. Five hundred dollars for municipal, district and county committees for reports required under section 1017-A, subsection 4-B. [2011, c. 558, §4 (AMD).]
- E. [2011, c. 558, §5 (RP).]

[ 2011, c. 558, §§4, 5 (AMD) .]

**6. Request for a commission determination.** If the commission staff finds that a candidate or political committee has failed to file a report required under this subchapter, the commission staff shall mail a notice to the candidate or political committee within 3 business days following the filing deadline informing the candidate or political committee that a report was not received. If a candidate or a political committee files a report required under this subchapter late, a notice of preliminary penalty must be sent to the candidate or political committee whose registration or campaign finance report was not received by 11:59 p.m. on the deadline date, informing the candidate or political committee of the staff finding of violation and preliminary penalty calculated under subsection 4-A and providing the candidate or political committee with an opportunity to request a determination by the commission. Any request for a determination must be made within 14 calendar days of receipt of the commission's notice. A candidate or political committee requesting a determination may either appear in person or designate a representative to appear on the candidate's or political committee's behalf or submit a sworn statement explaining the mitigating circumstances for consideration by the commission. A final determination by the commission may be appealed to the Superior Court in accordance with Title 5, chapter 375, subchapter 7 and the Maine Rules of Civil Procedure, Rule 80C.

[ 2013, c. 334, §17 (AMD) .]

**7. Final notice of penalty.** If a determination has been requested by the candidate or political committee and made by the commission, notice of the commission's final determination and the penalty, if any, imposed pursuant to this subchapter must be sent to the candidate and the political committee.

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

[ 2009, c. 302, §6 (AMD) .]

**8. Failure to file report.** The commission shall notify a candidate who has failed to file a report required by this subchapter, in writing, informing the candidate of the requirement to file a report. The notice must be sent by certified mail. If a candidate fails to file a report after 2 notices have been sent by the commission, the commission shall send a final notice by certified mail informing the candidate of the requirement to file and that the matter may be referred to the Attorney General for criminal prosecution. A candidate who fails to file a report as required by this subchapter after the commission has sent the notices required by this subsection is guilty of a Class E crime.

[ 2007, c. 443, Pt. A, §25 (AMD) .]

**8-A. Penalties for failure to file report.** The penalty for failure to file a report required under this subchapter may not exceed the maximum penalties as provided in subsection 5-A.

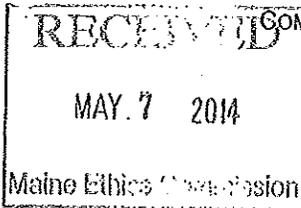
[ 2003, c. 628, Pt. A, §6 (NEW) .]

**9. List of late-filing candidates.** The commission shall prepare a list of the names of candidates who are late in filing a report required under section 1017, subsection 2, paragraph C or D or section 1017, subsection 3-A, paragraph B or C within 30 days of the date of the election and shall make that list available for public inspection.

[ 1995, c. 483, §15 (NEW) .]

**10. Enforcement.** A penalty assessed pursuant to this section that has not been paid in full within 30 days after issuance of a notice of the final determination may be enforced in accordance with section 1004-B.

[ 2009, c. 302, §7 (RPR) .]



*Exempt*

**2014 CANDIDATE REGISTRATION**

Notice: Changes to registration information must be filed within 10 days in writing or by e-mail to the Commission.

Is this an amendment?  Yes  No

**1. CANDIDATE INFORMATION**

Are you running as a (check one):			<input type="checkbox"/> Maine Clean Election Act candidate	<input type="checkbox"/> traditionally financed candidate
Title	Party affiliation		Office sought	
<input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Mrs. <input type="checkbox"/> Mr. <input type="checkbox"/> Dr. <input type="checkbox"/> Honorable	Republican		Franklin County Treasurer	
Name: First	MI or Middle Name	Last	District or County	
Joanne	S	KARKOS	FRANKLIN	
Mailing address			Home Phone	
PO BOX 9 98945 RT 2 W			207-645-2862	
City, zip code			Cell Phone	
East Dixfield ME 04227			207-860-8529	
E-mail		Fax	Work Phone	
			207-645-3254	

**2. TREASURER INFORMATION**

Name: First	MI or Middle Name	Last	Phone (home)
Mailing address			Phone (work)
City, zip code		E-mail	Fax

**DESIGNATION OF TREASURER:** A candidate for office must appoint a treasurer no later than 10 days after becoming a candidate, and before accepting contributions, making expenditures or incurring obligations. No later than 10 days after appointing a treasurer, the candidate must register with the Commission the name and address of the candidate and treasurer. The treasurer is responsible for maintaining campaign records and for filing reports. A MCEA candidate may serve as treasure for no more than 14 days following the date of registration. (21-A MRSA §§ 1013-A and 1125(12-A))

**2A. DEPUTY TREASURER INFORMATION**

Name: First	MI or Middle Name	Last	Phone (home)
Mailing address			Phone (work)
City, zip code		E-mail	

**DESIGNATION OF DEPUTY TREASURER (optional):** The candidate may appoint a deputy treasurer and notify the Commission no later than 10 days after the appointment. The deputy, when acting in the absence of the treasurer, has the same powers and responsibilities as the treasurer. A MCEA candidate may serve as deputy treasure for no more than 14 days following the date of registration. (21-A MRSA §§ 1013-A and 1125(12-A)) (21-A MRSA § 1013-A (1)(A)(1))

3. AUTHORIZED AGENT INFORMATION		
Name	Phone	Email
Name	Phone	Email

**DESIGNATION OF AUTHORIZED AGENT (optional):** Please use this section to designate individuals, other than the treasurer and deputy treasurer, authorized to file reports on your behalf.

4. POLITICAL COMMITTEE INFORMATION	
Name	Phone
Address of campaign headquarters	City, zip code

**DESIGNATION OF POLITICAL COMMITTEE (optional):** The candidate may form a political or campaign committee. Within 10 days of forming the committee and before accepting contributions, making expenditures or incurring obligations, the candidate must:

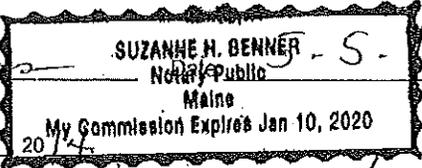
- appoint a treasurer (the candidate may have only one treasurer who is listed in Section 2) and
- register the committee and its officers, if any are appointed, with the Commission. (21-A MRSA § 1013-A (1) (B))

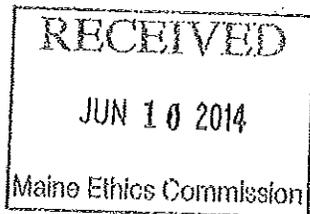
**Committee Officers (use additional pages, if necessary):**

Name	Title	Phone
Mailing address	City, zip code	E-mail

Name	Title	Phone
Mailing address	City, zip code	E-mail

5. CERTIFICATION	
I, <u>Joanne S KARKOS</u> , certify that the information in this registration is true, accurate and complete. <small>(Print Candidate's Full Name)</small>	
Signature of Candidate <u>Joanne S Karkos</u>	Date <u>5-5-14</u>

6. FOR COUNTY CANDIDATES ONLY	
<p><b>REPORTING EXEMPTION REQUEST:</b> A candidate for <u>county office</u> may request an exemption from the obligation to appoint a treasurer and file campaign finance reports if the candidate does not accept any cash or in-kind contributions or make any expenditures for his or her campaign. You cannot request a reporting exemption if you use your or your spouse's/domestic partner's personal funds to pay for your campaign expenses. To request an exemption, complete the statement below and sections 1 &amp; 5, have the form notarized, and submit it to the Commission.</p> <p><b>STATEMENT OF ELIGIBILITY FOR A REPORTING EXEMPTION:</b> I, the undersigned, swear or affirm that I will not accept contributions, make expenditures or incur obligations associated with my candidacy.</p>	
Signature of county candidate <u>Joanne S Karkos</u>	
Subscribed and sworn (affirmed) to before me this <u>6</u> day of <u>May</u>	
Signature of Notary/Attorney-at-law <u>Suzanne H Benner</u> <small>(Seal is optional)</small>	My commission expires <u>01/10/2020</u> <small>(Date)</small>
<p><b>REVOCAION NOTICE:</b> The foregoing statement may be revoked. Prior to revocation, the candidate must appoint a treasurer. A revocation notice must be in the form of an amended registration which must be filed with the Commission no later than 10 days after the date the treasurer is appointed. The notice must be filed before contributions are accepted or expenditures made. A late revocation notice is subject to the same penalties applicable to late campaign finance reports.</p>	



PAMELA PRODAN  
P.O. BOX 910  
WILTON, MAINE 04294

June 9, 2014



via fax and first class mail

Jonathan Wayne, Executive Director  
Commission on Governmental Ethics & Election Practices  
135 State House Station  
Augusta, ME 04333

Dear Mr. Wayne,

I am a Democratic candidate for Franklin County Treasurer, traditionally financed. I am writing to complain that Joanne Karkos, who registered as a Republican write-in candidate for Franklin County Treasurer, and who filed as exempt with the Commission, has made expenditures for her campaign. The public, including myself, has not yet been able to find out what any of her expenditures have been for the primary because she did not appoint a treasurer and file a 11-day pre-primary campaign finance report.

Last week, on June 5, I was shocked to discover that numerous professionally printed campaign signs were posted along highways and roads in Franklin County, promoting the Joanne Karkos candidacy and instructing Republicans to write in her name. When I first learned of her write-in candidacy, I noted that she had filed as exempt. She had sworn under oath that she would not collect contributions or make expenditures for her primary campaign. After work on June 5, I checked the Commission's website for any updated information, and found none, as her page still said "no filings due." See Exhibit A attached.

I also ask you to look into the flyer from the legislative candidate, Tom Skolfield, about Joanne Karkos's candidacy, urging "the good folks in Weld" to write in her name. See Exhibit B attached. This is a campaign communication that does not contain any disclosure, so it is impossible to know if it was authorized by the candidate or coordinated with the candidate, and who financed it. This communication came to my attention last week as well. I am also aware that Joanne Karkos has handed out small printed notes on paper that advocate for her write-in candidacy, but I do not have one of those.

When I called the Commission on Friday, June 6, and discussed with the Commission's staff the expenditure for the signs for the Joanne Karkos campaign, I agreed that the staff person should call Joanne Karkos, and I asked the Commission's staff person to call me with an update once she had done that. In her followup message to me, the Commission's staff person said that Joanne Karkos claimed she had ordered the signs, but

had not paid for the signs yet. She also said that she would be revoking her exempt status. First of all, signs are usually paid for on delivery. Is it possible she paid with a credit card and thinks that because she hasn't paid her credit card bill yet, she hasn't paid for the signs? Even so, if the signs truly have not been paid for yet, this is a distinction without a difference, since the statute and the Commission's Candidate Guide make it quite clear that a contract, promise or agreement, expressed or implied, to make an expenditure is an expenditure, and that a promise of payment is an expenditure, just like a payment is. 21-A M.R.S.A. §1012(3)(A); Commission's Candidate Guide Appendix, Page A3. Given typical lead times for silkscreen-printed signs, the order for signs must have been made a while ago, and I suspect that expenditure should have been disclosed on an 11-day pre-primary campaign finance report.

It appears to me that Joanne Karkos intentionally intended to avoid public disclosure of all of her primary campaign expenditures, by filing as exempt, when she knew she would be making or had already made expenditures. I hope that the Commission will immediately review any filing she makes, for compliance, accuracy and proper disclosure to the public of all money spent on her primary campaign, what the money was spent for, dates expenditures were made (as opposed to dates of payments, whether by cash, check, or credit card), and the source(s) of campaign funds used by Joanne Karkos. I also ask the Commission to investigate the nature of the Skolfield communication (and any other campaign communications that come to light), when and how widely it was disseminated, whether it was coordinated with the candidate or authorized by the candidate, whether it violated the applicable disclosure requirements. In spite of the fact that Joanne Karkos now says she will revoke her exempt status and begin filing reports, even if she files a report today, it being one day away from the primary election, filing a report at this late date is not adequate disclosure to the public of the information that should already have been disclosed before now. Where appropriate, I hope all civil penalties will be applied.

Thank you.

Sincerely,

*Pamela Prodan*

Pamela Prodan



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**Candidate/Committee Information**

Name:	KARKOS JOANNE S.	Committee ID:	7912
Address:	PO BOX 9	Committee Name:	
	EAST DIXFIELD ME 04227	Committee Type:	Candidate
Phone:	207-645-2862	Status:	Active
Date Registered:	05/07/2014	Party:	REPUBLICAN
Date Dissolved:		Jurisdiction:	Franklin
Financing:	Traditional	Office:	COUNTY TREASURER
		District:	

**Officers**

Officer Name	Officer Position	Phone
JOANNE S KARKOS	Candidate	207-860-8529

**Campaigns**

Election Cycle	Party Affiliation	Jurisdiction	Office	Status
2014 ELECTION (COUNTY OFFICE - 4 YEAR CYCLE)	REPUBLICAN	Franklin	COUNTY TREASURER	Active

**Filing History**

Filter By: All Report Types  
Filter By: Select all years...

Description	Period Begin	Period End	Due Date	Filed Date	Amended	Status	Annual Year
Candidate Registration				05/07/2014 12:00 AM	No	Filed	2014

**Filings Due**

No filings due

**Document Images**

Filter By: All Document Types

Date	Type	Comment
05/09/2014	Correspondence - Public	

*EX A.*

Dear Fellow Republicans,

06/01/2014

Earlier this year, an individual was slated to be a Republican candidate for Franklin County Treasurer. Unfortunately, it did not work out and then it was too late to get the required signatures to place a replacement on the ballot.

Joanne Karkos, who is currently in charge of the East Dixfield Post Office which is scheduled to be closed this September, is willing to be on the November ballot as a Republican candidate. In order for that to happen however, she must receive at least 300 write in votes in the June 10<sup>th</sup> Primary County wide.

It is hoped we can get her those 300 write in votes. Please write her name (Joanne Karkos) in on the ballot under County Treasurer and then, be sure to shade in the oval next her name to cast your vote.

I am certain the good folks in Weld will do their part in helping to place a Republican choice on the November ballot.

Please be sure to vote on Tuesday June 10<sup>th</sup>!

Thanks for your support, and if you have any questions please do not hesitate to call me @ 585-2638

Tom Skolfield ☺

*Tom*



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

June 9, 2014

Joanne S. Karkos  
PO Box 9  
989 US Route 2 W  
East Dixfield, Maine 04227

Dear Ms. Karkos:

As we discussed on the phone today, you have made expenditures for your campaign prior to revoking your Exempt Status as a County Candidate. We were made aware of this when we received a call from someone stating that they saw signs with your name that had a disclosure stating the signs were "authorized and paid for by the Candidate." You also confirmed that you made the expenditure.

When you filed your registration form on May 7, 2014 and signed the request for reporting exemption, you stated that you would not accept any cash or in-kind contributions or make any expenditures for your campaign. Because you have spent funds on your campaign, you are no longer eligible for a filing exemption. Therefore, you must appoint a treasurer (you may act as your own treasurer) and file an amended registration form with the Commission. A late revocation notice may be subject to the same penalties applicable to late campaign finance reports.

Because you have made campaign expenditures, you were required to file an 11-Day Pre-Primary report which was due May 30th. A late filed campaign finance report may also be subject to penalties.

Please complete the enclosed Registration Form, Electronic Filing Waiver and the 11-Day Pre-Primary Campaign Finance Report and return these forms to our office as soon as possible.

If you have any questions, please contact me.

Thank you for your attention to this matter.

Sincerely,

Beth Hudson  
Candidate Registrar

June 18, 2014

Dear Members of the Ethics Commission:

On June 9<sup>th</sup> 2014, per our phone conversation, I truly believed I had correctly filed and was in good standing on the campaign finance report.

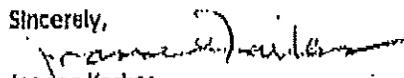
I read "Exempt Status" to mean if I paid for all my expenditures myself, I would be exempt from having to file any reports for expenses made on my campaign. It never occurred to me to report my personal paper and ink stock as a cost expenditure for my campaign.

It was through my lack of knowledge of the political campaign process that led to this complaint. I want and am campaigning for the Franklin County Treasurer's position. I have been a Postmaster for 16 years and have taken an oath to uphold the law and perform the duties of my office with intelligence, diligence, and discretion. Due to my position as Postmaster I am held to a higher accountability and would in no way knowingly or intentionally make such an error and put the job I now hold in jeopardy.

I can assure you because of my integrity that when I received your call, I was totally shocked, concerned and ready to resolve the problem and I did so immediately. On June 9<sup>th</sup> 2014 I immediately submitted an amended report and have made many calls to make sure I'm legal and above board on all fronts. I have nothing to hide. I haven't tried to hide anything. I just didn't fill out the form correctly the first time.

In response to Tom Skolfields flyer stating my post office was closing was incorrect. It is reducing hours. Had I known about or helped with this I would have changed the false information. Also on the Kevin Raye ad it was stated I was from New Sharon. I have lived and grown up in Farmington Falls, Me and recently relocated to East Dixfield Me. Another proof I had no input or no prior knowledge. I ordered the road signs on May 30<sup>th</sup>, 2014. The signs were made June 2, 2014 and picked up June 3<sup>rd</sup>, 2014, and were put out June 4<sup>th</sup> 2014. I received the bill and charged my credit card on June 11<sup>th</sup> 2014. These expenses will be on my next finance report. Thank You.

Sincerely,

  
Joanne Karkos



**RECEIVED**  
JUN 11 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

**2014 CANDIDATE REGISTRATION**

*Revoke Exemption*

Notice: Changes to registration information must be filed within 10 days in writing or by e-mail to the Commission.

Is this an amendment?  Yes  No

**1. CANDIDATE INFORMATION**

Are you running as a (check one):			<input type="checkbox"/> Maine Clean Election Act candidate	<input type="checkbox"/> traditionally financed candidate
Title <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Mrs. <input type="checkbox"/> Mr. <input type="checkbox"/> Dr. <input type="checkbox"/> Honorable		Party affiliation <i>Republican</i>		Office sought <i>County treasurer</i>
Name: First <i>Joanne</i>	MI or Middle Name <i>S</i>	Last <i>KARKOS</i>		District or County <i>FRANKLIN</i>
Mailing address <i>PO Box 9</i>			Home Phone <i>207-645-2862</i>	
City, zip code <i>EAST DIXFIELD ME 04227</i>			Cell Phone <i>207-850-8529</i>	
E-mail <i>Rodney@HallFarms.com</i>		Fax	Work Phone <i>207-645-3254</i>	

**2. TREASURER INFORMATION**

Name: First <i>Joanne</i>	MI or Middle Name <i>S</i>	Last <i>KARKOS</i>	Phone (home) <i>207-645-2862</i>
Mailing address <i>PO Box 9</i>			Phone (work) <i>207-645-3254</i>
City, zip code <i>East Dixfield ME 04227</i>	E-mail <i>Rodney@HallFarms.com</i>		Fax

**DESIGNATION OF TREASURER:** A candidate for office must appoint a treasurer no later than 10 days after becoming a candidate, and before accepting contributions, making expenditures or incurring obligations. No later than 10 days after appointing a treasurer, the candidate must register with the Commission the name and address of the candidate and treasurer. The treasurer is responsible for maintaining campaign records and for filing reports. A MCEA candidate may serve as treasure for no more than 14 days following the date of registration. (21-A MRSA §§ 1013-A and 1125(12-A))

**2A. DEPUTY TREASURER INFORMATION**

Name: First	MI or Middle Name	Last	Phone (home)
Mailing address			Phone (work)
City, zip code			E-mail

**DESIGNATION OF DEPUTY TREASURER (optional):** The candidate may appoint a deputy treasurer and notify the Commission no later than 10 days after the appointment. The deputy, when acting in the absence of the treasurer, has the same powers and responsibilities as the treasurer. A MCEA candidate may serve as deputy treasure for no more than 14 days following the date of registration. (21-A MRSA §§ 1013-A and 1125(12-A)) (21-A MRSA § 1013-A (1)(A)(1))

3. AUTHORIZED AGENT INFORMATION		
Name	Phone	Email
Name	Phone	Email

**DESIGNATION OF AUTHORIZED AGENT (optional):** Please use this section to designate individuals, other than the treasurer and deputy treasurer, authorized to file reports on your behalf.

4. POLITICAL COMMITTEE INFORMATION	
Name	Phone
Address of campaign headquarters	City, zip code

**DESIGNATION OF POLITICAL COMMITTEE (optional):** The candidate may form a political or campaign committee. Within 10 days of forming the committee and before accepting contributions, making expenditures or incurring obligations, the candidate must:

- appoint a treasurer (the candidate may have only one treasurer who is listed in Section 2) and
- register the committee and its officers, if any are appointed, with the Commission. (21-A MRSA § 1013-A (1) (B))

**Committee Officers (use additional pages, if necessary):**

Name	Title	Phone
Mailing address	City, zip code	E-mail

Name	Title	Phone
Mailing address	City, zip code	E-mail

5. CERTIFICATION	
I, <u>Joanne S Karkos</u> , certify that the information in this registration is true, accurate and complete. <small>(Print Candidate's Full Name)</small>	
Signature of Candidate <u>Joanne S Karkos</u>	Date <u>6-10-14</u>

6. FOR COUNTY CANDIDATES ONLY	
<p><b>REPORTING EXEMPTION REQUEST:</b> A candidate for <u>county office</u> may request an exemption from the obligation to appoint a treasurer and file campaign finance reports if the candidate does not accept any cash or in-kind contributions or make any expenditures for his or her campaign. You cannot request a reporting exemption if you use your or your spouse's/domestic partner's personal funds to pay for your campaign expenses. To request an exemption, complete the statement below and sections 1 &amp; 5, have the form notarized, and submit it to the Commission.</p>	
<p><b>STATEMENT OF ELIGIBILITY FOR A REPORTING EXEMPTION:</b> I, the undersigned, swear or affirm that I will not accept contributions, make expenditures or incur obligations associated with my candidacy.</p>	
Signature of county candidate _____	Date _____
Subscribed and sworn (affirmed) to before me this _____ day of _____, 20____.	
Signature of Notary/Attorney-at-law _____ <small>(Seal is optional)</small>	My commission expires _____ <small>(Date)</small>
<p><b>REVOCAION NOTICE:</b> The foregoing statement may be revoked. Prior to revocation, the candidate must appoint a treasurer. A revocation notice must be in the form of an amended registration which must be filed with the Commission no later than 10 days after the date the treasurer is appointed. The notice must be filed before contributions are accepted or expenditures made. A late revocation notice is subject to the same penalties applicable to late campaign finance reports.</p>	



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 PRIVATELY FINANCED CANDIDATES**

COMMITTEE		TREASURER	
JOANNE S KARKOS PO BOX 9 EAST DIXFIELD, ME 04227 PHONE: (207) 645-2862 EMAIL: ETHICS@MAINE.GOV		JOANNE S KARKOS PO BOX 9 EAST DIXFIELD, ME 04227 PHONE: (207) 860-8529 EMAIL: ETHICS@MAINE.GOV	
REPORT	DUE DATE	REPORTING PERIOD	
11-DAY PRE-PRIMARY	05/30/2014	05/07/2014 - 05/27/2014	

**FINANCIAL ACTIVITY SUMMARY**

RECEIPTS	TOTAL FOR THIS PERIOD	TOTAL FOR CAMPAIGN
1. CASH CONTRIBUTIONS FOR THE PRIMARY ELECTION (SCHEDULE A)	\$0.00	\$0.00
1A. CASH CONTRIBUTIONS FOR THE GENERAL ELECTION(SCHEDULE A) <i>For party candidates, general election contributions will only appear on this line after the primary.</i>		
1B. CASH CONTRIBUTIONS FOR THE GENERAL ELECTION RAISED PRIOR TO PRIMARY (Not shown on Schedule A of this report)		
2. OTHER CASH RECEIPTS (INTEREST, ETC)	\$0.00	\$0.00
3. LOANS (SCHEDULE C)	\$0.00	\$0.00
4. TOTAL RECEIPTS	\$0.00	\$0.00
EXPENDITURES		
5. EXPENDITURES (SCHEDULE B)	\$0.00	\$0.00
6. LOAN REPAYMENTS (SCHEDULE C)	\$0.00	\$0.00
7. TOTAL PAYMENTS	\$0.00	\$0.00
CASH SUMMARY		
8. CASH BALANCE AT BEGINNING OF PERIOD	\$0.00	
9. PLUS TOTAL RECEIPTS THIS PERIOD (LINE 4)	\$0.00	
10. MINUS TOTAL PAYMENTS THIS PERIOD (LINE 8)	\$0.00	
11. CASH BALANCE AT END OF PERIOD	\$0.00	
OTHER ACTIVITY		
12. IN-KIND CONTRIBUTIONS (SCHEDULE A-1)	\$5.00	\$5.00
13. TOTAL LOAN BALANCE AT END OF PERIOD (SCHEDULE C)	\$0.00	
14. TOTAL UNPAID DEBTS AT END OF PERIOD (SCHEDULE D)	\$0.00	
FOR PARTY CANDIDATES ONLY: CASH CONTRIBUTIONS FOR THE GENERAL ELECTION RAISED PRIOR TO PRIMARY ELECTION (INCLUDED IN LINE 1A AFTER PRIMARY ELECTION)	\$0.00	\$0.00

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

REPORT FILED BY: ELIZABETH HUDSON  
 REPORT FILED ON: 06/10/2014  
 LAST MODIFIED: 06/10/2014  
 PRINTED: 06/20/2014  
 COMMITTEE ID: 7912

**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

2 = Candidate/ Spouse/ Domestic Partner

3 = Commercial Source

4 = Nonprofit Organization

5 = Political Action Committee

6 = Political Party Committee

7 = Ballot Question Committee

8 = Other Candidate/ Candidate Committee

9 = Candidate / Candidate Committee

10 = General Treasury Transfer

11 = Transfer from Previous Campaign

12 = Contributors giving \$50 or less

13 = Contributors giving \$100 or less

14 = Contributors giving \$200 or less

15 = MCEA Payment

16 = Financial Institution

DATE RECEIVED	CONTRIBUTOR'S NAME, ADDRESS, ZIP	OCCUPATION AND EMPLOYER	DESCRIPTION (of goods, services, facilities, or discounts received)	TYPE	AMOUNT
5/7/2014	JOANNE KARKOS PO BOX 9 EAST DIXFIELD, ME 04227	UNITED STATES POSTAL SERVICE	USED PAPER AND INK FROM PERSONAL SUPPLIES TO MAKE NOTES WITH NAME AND CONTACT INFORMATION TO GIVE TO PEOPLE.	2	\$5.00
<b>TOTAL IN-KIND CONTRIBUTIONS</b>					\$5.00



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

June 10, 2014

By Regular Mail

Joanne S. Karkos  
PO Box 9  
East Dixfield, ME 04227

Dear Ms. Karkos:

RE: Late Campaign Finance Report Due May 30, 2014 by 11:59 PM.

You filed an 11-DAY PRE-PRIMARY campaign finance report on 6/4/2014. The staff of the Ethics Commission has made a preliminary finding that the report was filed late. We are not requesting payment of any penalty, either because the report contained no financial activity or because the penalty is under \$10 and is automatically waived. Nevertheless, because the staff has found that the report was filed late, the penalty for any *other* report filed late this year will be increased because of this violation.

If the late filing was due to mitigating circumstances (defined below), you may request that the members of the Ethics Commission waive the finding of late filing. To make the request, please send a letter within 14 days of receiving this notice. Upon receiving your request, the Commission staff will notify you of the date and time of the public meeting at which the Commissioners will consider your request.

The Election Law defines mitigating circumstances as: (1) a valid emergency, (2) an error by the Commission staff, (3) failure to receive notice of the filing deadline, or (4) relevant evidence presented that a *bona fide* effort was made to file the report in accordance with the statutory requirements.

Please call me at 287-4179 if you have any questions about this notice.

Sincerely,

Beth Hudson  
Candidate Registrar

## Wayne, Jonathan

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**From:** Hudson, Elizabeth  
**Sent:** Tuesday, June 17, 2014 12:10 PM  
**To:** Wayne, Jonathan  
**Subject:** FW: Pam Prodon  
**Attachments:** Dear Fellow Republicans.docx

---

**From:** Tom & Gordeen Skolfield [<mailto:skolfield@tds.net>]  
**Sent:** Tuesday, June 17, 2014 12:00 PM  
**To:** Hudson, Elizabeth  
**Cc:** [Skolfield@tds.net](mailto:Skolfield@tds.net)  
**Subject:** Pam Prodon

Elizabeth,

As a follow up to our phone conversation this morning I would like to submit the following.

In early May at a Republican county meeting I learned that for a variety of reasons we did not have a candidate for Franklin County treasurer for the November election. At that meeting, Joanne Karkos, who I met for the first time, said she would run if she could obtain the 300 plus write in votes to achieve that. The write in ballot process was explained to the group. During that explanation it was noted that if twenty voters from every town in the county were to write her name in on the blank under county treasurer she would be on the ballot in the fall. I never saw or had any contact with Joanne Karkos after that evening, nor did I discuss the write in initiative with anyone else.

About a week before the primary election, I sent a note to friends and acquaintances in town who I believed to be Republicans. I sent out about ten or twelve envelopes using my personal funds, thus hoping to reach out to about forty or so potential voters. All this was done without any coordination or connection with the candidate. To my knowledge Joanne Karkos was completely unaware of my efforts on behalf of her candidacy until after the election and the complaint from Ms. Prodan was filed.

I chose to send out notes to folks rather than do personal home visits for several reasons. It was less expensive than driving around town. It provided folks with the correct spelling of the candidates name. It was less time consuming for me as well. Please see the attachment.

Lastly, I cannot emphasize enough that my efforts were totally independent and personally funded, without any knowledge of anyone, except my wife who helped me send the notes. We both believe we were expressing our Right to Free Speech in attempting to give the voters in our county a choice in the fall election. I believe that voters should have that choice in any election regardless of party affiliation. That choice helps provide us all with better and more ethical government.

If you have any further questions or concerns please feel free to contact me.

Tom Skolfield  
349 Phillips Road  
Weld, Maine 04285  
207.585.2638  
[Skolfield@tds.net](mailto:Skolfield@tds.net)

Dear Fellow Republicans,

06/01/2014

Earlier this year, an individual was slated to be a Republican candidate for Franklin County Treasurer. Unfortunately, it did not work out and then it was too late to get the required signatures to place a replacement on the ballot.

**Joanne Karkos**, who is currently in charge of the East Dixfield Post Office which is scheduled to be closed this September, is willing to be on the November ballot as a Republican candidate. In order for that to happen however, she must receive at least 300 write in votes in the June 10<sup>th</sup> Primary County wide.

It is hoped we can get her those 300 write in votes. Please write her name (**Joanne Karkos**) in on the ballot under **County Treasurer** and then, **be sure to shade in the oval next her name** to cast your vote.

I am certain the good folks in **Weld** will do their part in helping to place a **Republican** choice on the November ballot.

Please be sure to vote on Tuesday June 10<sup>th</sup>!

Thanks for your support, and if you have any questions please do not hesitate to call me @ 585-2638)

Tom Skolfield ☺

---

Dear Fellow Republicans,

06/01/2014

Earlier this year, an individual was slated to be a Republican candidate for Franklin County Treasurer. Unfortunately, it did not work out and then it was too late to get the required signatures to place a replacement on the ballot.

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I am certain the good folks in **Weld** will do their part in helping to place a **Republican** choice on the November ballot.

Please be sure to vote on Tuesday June 10<sup>th</sup>!

Thanks for your support, and If you have any questions please do not hesitate to call me @ 585-2638

Tom Skolfield ☺

Printer's Plan 2008.04 (04.16.09 #1333)  
05/30/14 11:02:00

**Bangor Letter Shop & Color Copy Ctr**  
**Work Order 79708**  
**POSTER SIGN 22 X 28 ONE SIDED**

*SH 38.35*

**79708**

<b>Bill To Customer No: 6085</b> COMMITTEE TO ELECT JOANNE KARKOS P.O. BOX 9 EAST DIXFIELD ME 04227	<b>Ordered By</b> JOANNE KARKOS  Ph1: 645-3254W Ph2: Cell: Fax:  P.O: Loc: Store 1	<b>When</b> In 05/30/2014 Fri Proof  Due 06/03/2014 Tue  Via CALL CSR AMY SRep From Scratch
--	---	--

*Ship via Greenwood to Lewiston Terminal*

Specs - This job has 1 Item	Actual Qty	Charge Qty	Cost	Price
ITEM 1 POSTER SIGN 22 X 28 FLAT ONE SIDED ONE COLOR INK (1 Orig)		60		
Buyouts OTHER MODERN SCREENPRINT		60		

*Shkup*

*Proof Sent 5/29*  
*Placed Order*

*Proof ok with Changes 5/30 RD*  
*Add DISCLAIMER - Final Cost authorized by The Candidate*

Invoice	
No: 79708	Date: 06/03/14

Ship To:

< Same as Bill To >

COMMITTEE TO ELECT JOANNE KARKOS  
 P.O. BOX 9  
 EAST DIXFIELD ME 04227

Acct.No	Ordered by	Phone	P.O. No	Prepared by	Sales Rep	Ship Via
6085	JOANNE KARKOS	645-3254W		AMY		CALL
Quantity	Description					Price
60	POSTER SIGN 22 X 28 FLAT ONE SIDED ONE COLOR INK					315.00
<i>THANK YOU FOR YOUR BUSINESS</i>						
					Subtotal	315.00
					Shipping	38.35
					Postage	0.00
					Tax	19.44
					TOTAL	372.79
					Paid	0.00
					BALANCE	372.79
					Terms	Net 30 Days

**PLEASE PAY THE BALANCE FROM THIS INVOICE.**

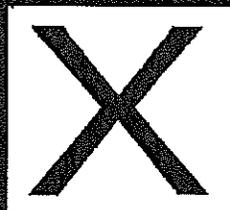
# REPUBLICANS

*Write in*

Joanne

**Karkos**

**COUNTY TREASURER**



100 ... 0500 ... 0500 ... 0500 ... 0500 ... 0500 ... 0500 ... 0500



RECEIVED  
 JUN 3 2014  
 Maine Ethics Commission

COMMISSION OF  
 Mail

IE #3  
 2014 Primary Election

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) Raye for Congress  
 Mailing Address PO Box 207  
 City, Zip Code Eastport, ME 04631 Telephone 207-200-7293

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 totaling 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.

[Signature]  
 Signature of P/C or Party Treasurer, or  
 Other Authorized Person Making Expenditure(s)

6/3/2014  
 Date



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

INDEPENDENT EXPENDITURE REPORT – PRIMARY ELECTION

AFFIDAVIT

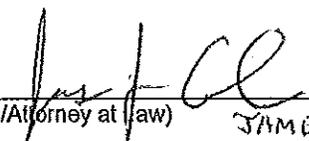
STATE OF ME

COUNTY OF Kennebec

I, Kathleen Summers-Gree, 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.

  
\_\_\_\_\_  
Signature of Affiant

Sworn to before me, this 3<sup>rd</sup> day of June, 2014

  
\_\_\_\_\_  
(Notary Public/Attorney at Law) JAMES I. COHEN BAR # 7398

My commission expires: N/A

Schedule B-IE-1

CANDIDATE(S) SUPPORTED/OPOSED

- 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
Franklin County Treasurer	Joanne Karkos	Support of	\$156
Total expenditures for all candidates this reporting period. This amount should equal the total independent expenditures listed on Schedule B-IE-2, Line C. ⇒			\$156

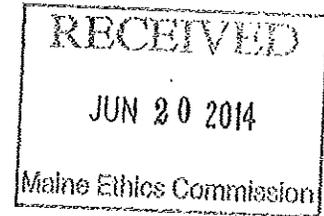
Schedule B-IE-2  
PAYMENTS AND OBLIGATIONS

- 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	✓	Amount
6/2/14	WKTJ Radio 121 Broadway, Farmington, ME 04938	RAD	✓	\$ 156
A. Expenditures for this page ⇒				\$ 156
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> ⇒				\$ 156

PAMELA PRODAN  
P.O. BOX 910  
WILTON, MAINE 04294



June 17, 2014

Jonathan Wayne, Executive Director  
Commission on Governmental Ethics & Election Practices  
135 State House Station  
Augusta, ME 04333

Dear Mr. Wayne,

This is a follow-up letter to my June 9, 2014 letter to you regarding the Franklin County Treasurer's race and Republican write-in candidate Joanne Karkos, who registered as exempt with the Commission. After I mailed you my June 9 letter, it came to my attention that a political advertisement appeared in The Franklin Journal dated June 6, 2014 promoting the Joanne Karkos write-in candidacy that says it was paid for by the candidate. See Exhibit A attached to this letter for a copy of the page from the newspaper with the ad.

I also became aware that political advertisements on WKTJ Radio in Farmington were broadcast before the Primary Election promoting the Joanne Karkos write-in candidacy. Apparently, from what I have been told, the Republican Congressional candidate, Kevin Raye, spoke on the advertisement, endorsing her candidacy. I do not have any further information about these radio broadcasts, except that it is my understanding that they were heard on Monday June 9 and/or Tuesday, June 10.

I also enclose as Exhibit B, a photo of the sign for the Joanne Karkos write-in campaign that I wrote about in my June 9 letter.

Thank you for your attention to this matter.

Sincerely,

*Pamela Prodan*

Pamela Prodan

5x A

2. Franklin Journal, Friday, June 6, 2014

Political Advertisement

**VOTERS OF FRANKLIN COUNTY**

*Tuesday June 10th - Primary Election*

My name is JOANNE KARKOS, Republican  
"WRITE-IN" candidate for County Treasurer. Please  
black out the oval on the left side of your June 10th  
ballot, and on the line beside it, "write in JOANNE  
KARKOS" under County Treasurer. Your support  
will be appreciated. Thank you.

Advertisement Paid for by the Candidate, Joanne Karkos P.O. Box 9, East Dixfield ME 04227. 645-3024

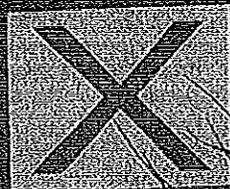
REPUBLICANS

*Write in*

Joanne

Karkos

COUNTY TREASURER



Ex. B

Greetings Beth,

Here is some more information Jonathan Wayne may need before our Wednesday meeting.

ADS taken out on June 2, 2014

In papers June 4<sup>th</sup>

June 6<sup>th</sup>

Charged to my credit card on June 12<sup>th</sup> 2014

Franklin Journal  
187 Wilton Rd  
Farmington Me 04938  
207-778-2075

Hope this helps!

Joanne Karkos  
P O Box 9  
East Dixfield Ma 04227  
207-645-3254



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

June 19, 2014

Joanne S. Karkos  
PO Box 9  
East Dixfield, Maine 04227

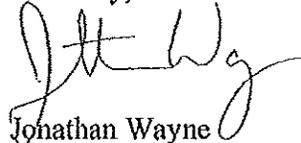
Dear Ms. Karkos:

This letter is to update you on the status of the complaint filed by Pamela Prodan on June 9, 2014. This complaint is being added to the agenda for the June 25<sup>th</sup> Commission meeting, which will be held at the office of the Commission on Governmental Ethics and Election Practices, located at 45 Memorial Circle in Augusta, beginning at 9:00 a.m. We recommend that you attend this meeting to answer any questions the Commissioners may have; and explain why you signed the reporting exemption and on May 5, 2014 and did not revoke it prior to incurring a campaign obligation on May 29 or 30.

If Ms. Prodan wishes to speak to the Commissioners to argue for a particular outcome or further investigation, I will consult with the Commission Chair.

The Ethics Commission staff has completed its gathering of preliminary factual information which will be posted to the Commission website tomorrow as part of the materials that will be considered by the Commissioners. Thank you for your attention to this matter.

Sincerely,



Jonathan Wayne  
Executive Director

cc: Pamela Prodan (by e-mail and U.S. Mail)