Organizational Relationships

Maine Organizations

Great Falls Recreation & Redevelopment, LLC
(Organized to purchase option to buy Mill Bldg. # 5)

1. **Stavros Mendros**—Manager & Member
2. **Peter Robinson**—Member
3. Ron Chicoine, MD—Member
4. Timothy Poutre, MD—Member
5. Wendy Poutre—Member
6. Steve Roop—Member
7. Peter Mars—Member
8. Florentia Mendros—Member
9. Elizabeth Tracey—Member
10. R. Kenneth Lindell—Member
11. John Buck—Member

Green Jobs for Maine
(PAC formed to put casino question on ballot)

1. **Stavros Mendros**—Principal Officer & Decision Maker
2. **Peter Robinson**—Treasurer & Decision Maker

People of Lewiston and Auburn Committee
(PAC formed for the purpose of running campaign)

1. William Welch—Treasurer & Principal Officer
2. Laurent F. Gilbert, Sr.—Principal Officer & Decision Maker
3. **Stavros Mendros**—Decision Maker
4. **Peter Robinson**—Decision Maker
5. Belinda Gerry—Decision Maker
6. Scott Lansley—Decision Maker
7. Larry Poulin—Decision Maker

Sources of Campaign Funds

M Five, Inc.
(Formed to develop and operate the casino)

Owners: Wild West Gaming (Ryan Hill & Scott Nash)
Incentovation (Ryan Hill & Scott Nash)
GT Source* (Dwayne Graham)
Chase Burns (owner of gambling software company)

Investors: Wild West Gaming (Ryan Hill & Scott Nash)
Incentovation (Ryan Hill & Scott Nash)
Chase Burns (owner of gambling software company)

* GT Source did not make a financial contribution in exchange for ownership.

Wild West Gaming
(WWG Technologies, LLC)

Controlled by: Ryan Hill
Scott Nash

Owner: WWG is wholly owned by Incentovation

Actual Political Contributions from Out-of-State Donors				
Ref. Number	Date of Payment (funds cleared payor account)	Payor (Source of Funds)	Payee	Amount
1	8/12/2011	Wild West Gaming	Olympic Consulting	$1,277.20
2	8/16/2011	Wild West Gaming	AG Artistic Consulting	$855.00
3	8/19/2011	Wild West Gaming	Olympic Consulting	$2,502.00
4	8/29/2011	Wild West Gaming	AG Artistic Consulting	$332.20
5	9/24/2011	Wild West Gaming	AG Artistic Consulting	$437.50
6A, B, C & D	9/22/2011	Wild West Gaming	Green Jobs for ME	$26,000.00
7A & B	10/05/2011	M Five, Inc. (Wild West Gaming)	Dome Messaging	$80,000.00
8A & B	10/14/2011	M Five, Inc. (Wild West Gaming)	Dome Messaging	$30,000.00
9A & B	10/18/2011	M Five, Inc. (Wild West Gaming)	Dome Messaging	$70,000.00
10A & B	10/26/2011	M Five, Inc. (Incentovation)	Dome Messaging	$45,000.00
11A & B	11/03/2011	M Five, Inc. (Chase Burns)	Dome Messaging	$130,000.00
12A & B	11/08/2011	M Five, Inc. (Chase Burns)	Dome Messaging	$1,250.00
13	11/10/2011	M Five, Inc. (Chase Burns)	AG Artistic Consulting	$522.50
14	11/10/2011	M Five, Inc. (Chase Burns)	AG Artistic Consulting	$43.75
			Total	$388,220.15

Income to M Five, Inc.			
Ref.	Date	Source of Funds	Amount
15	10/03/2011	Wild West Gaming	$1,000.00
16	10/05/2011	Wild West Gaming	$80,000.00
17	10/07/2011	Wild West Gaming	$55,000.00
18	10/13/2011	Wild West Gaming	$25,000.00
19	10/14/2011	Wild West Gaming	$30,000.00
20	10/18/2011	Wild West Gaming	$70,000.00
21	10/26/2011	Incentovation	$45,000.00
22	11/02/2011	Chase Burns	$150,000.00
23	12/06/2011	Incentovation	$5,000.00
		Total	$461.000.00

☆ 21-A §1053. REGISTRATION

Every political action committee, as defined under section 1052, subsection 5, paragraph A, subparagraph (1) or (4), that makes expenditures in the aggregate in excess of $1,500 and every political action committee, as defined under section 1052, subsection 5, paragraph A, subparagraph (5), that makes expenditures in the aggregate in excess of $5,000 must register with the commission within 7 days of exceeding the applicable amount on forms prescribed by the commission. These forms must include the following information and any additional information reasonably required by the commission to monitor the activities of political action committees in this State under this subchapter: [2007, c. 477, §3 (AMD).]

1. Identification of committee. The names and mailing addresses of the committee, its treasurer, its principal officers, the names of any candidates and Legislators who have a significant role in fund-raising or decision-making for the committee and all individuals who are the primary fund-raisers and decision makers for the committee;

[2007, c. 443, Pt. A, §29 (AMD) .]

2. Status.

[2007, c. 443, Pt. A, §29 (RP) .]

3. Depository of funds.

[2007, c. 443, Pt. A, §29 (RP) .]

4. Form of organization. The form or structure of organization, including cooperatives, corporations, voluntary associations, partnerships or any other structure by which the committee functions. The date of origin or incorporation must also be specified; and

[2007, c. 443, Pt. A, §29 (AMD) .]

5. Assets.

[2007, c. 443, Pt. A, §29 (RP) .]

6. Statement of support or opposition. A statement indicating the positions of the committee, support or opposition, with respect to a candidate, political committee or campaign.

[2011, c. 389, §33 (AMD) .]

7. Contributions to committee.

[2007, c. 443, Pt. A, §29 (RP) .]

Every change in information required by this section must be included in an amended registration form submitted to the commission within 10 days of the date of the change. The committee must file an updated registration form between January 1st and March 1st of each year in which a general election is held. The commission may waive the updated registration requirement for newly registered political action committees or other registered political action committees if it determines that the requirement would cause an administrative burden disproportionate to the public benefit of updated information. [2011, c. 389, §34 (AMD).]

21-A §1059. REPORT; FILING REQUIREMENTS

Committees required to register under section 1053, 1053-B or 1056-B shall file an initial campaign finance report at the time of registration and thereafter shall file reports in compliance with this section. All reports must be filed by 11:59 p.m. on the day of the filing deadline, except that reports submitted to a municipal clerk must be filed by the close of business on the day of the filing deadline. [2011, c. 389, §43 (AMD); 2011, c. 389, §62 (AFF).]

1. Contents; quarterly reports and election year reports.

[2007, c. 443, Pt. A, §35 (RP) .]

2. Reporting schedule. Committees shall file reports according to the following schedule.

A. All committees shall file quarterly reports:

(1) On January 15th, and the report must be complete as of December 31st;

(2) On April 10th, and the report must be complete as of March 31st;

(3) On July 15th, and the report must be complete as of June 30th; and

(4) On October 5th, and the report must be complete as of September 30th. [2011, c. 691, Pt. A, §19 (RPR).]

B. General and primary election reports must be filed:

(1) On the 11th day before the date on which the election is held and must be complete as of the 14th day before that date; and

(2) On the 42nd day after the date on which the election is held and must be complete as of the 35th day after that date. [2007, c. 443, Pt. A, §35 (AMD).]

C. Preelection and post-election reports for special elections or ballot measure campaigns must be filed:

(1) On the 11th day before the date on which the election is held and must be complete as of the 14th day before that date; and

(2) On the 42nd day after the date on which the election is held and must be complete as of the 35th day after that date. [2011, c. 389, §45 (AMD).]

D. A committee that files an election report under paragraph B or C is not required to file a quarterly report when the deadline for that quarterly report falls within 10 days of the filing deadline established in paragraph B or C. [1991, c. 839, §29 (RPR).]

E. A committee shall report any expenditure of $500 or more made after the 14th day before the election and more than 24 hours before 5:00 p.m. on the day of the election within 24 hours of that expenditure. [2007, c. 443, Pt. A, §35 (AMD).]

[2011, c. 691, Pt. A, §19 (AMD) .]

3. Report of expenditures made after the 11th day and more than 48 hours before any election.

[1989, c. 504, §§28, 31 (RP) .]

4. Special election reports.

[1989, c. 504, §§28, 31 (RP) .]

5. Electronic filing. Committees shall file each report required by this section through an electronic filing system developed by the commission. The commission may make an exception to this electronic filing requirement if a committee submits a written request that states that the committee lacks access to the

technology or the technological ability to file reports electronically. The request for an exception must be submitted within 30 days of the registration of the committee. The commission shall grant all reasonable requests for exceptions.

[2007, c. 443, Pt. A, §35 (AMD) .]

SECTION HISTORY
1985, c. 161, §6 (NEW). 1989, c. 7, §O6 (AMD). 1989, c. 504, §§28,31 (RPR). 1989, c. 833, §§16-20 (AMD). 1991, c. 839, §29 (AMD). 2003, c. 628, §B5 (AMD). 2005, c. 301, §§25,26 (AMD). 2007, c. 443, Pt. A, §35 (AMD). 2007, c. 571, §9 (AMD). 2009, c. 190, Pt. A, §§23, 24 (AMD). 2009, c. 366, §12 (AFF). 2009, c. 366, §9 (AMD). 2009, c. 652, Pt. A, §22 (AMD). 2011, c. 367, §2 (AMD). 2011, c. 389, §§43-45 (AMD). 2011, c. 389, §62 (AFF). 2011, c. 691, Pt. A, §19 (AMD).

21-A §1060. CONTENT OF REPORTS

The reports must contain the following information and any additional information required by the commission to monitor the activities of political action committees: [1985, c. 161, §6 (NEW).]

1. **Identification of candidates.** The names of and offices sought by all candidates whom the committee supports, intends to support or seeks to defeat;

[2007, c. 443, Pt. A, §36 (AMD) .]

2. **Identification of committees; parties.** The names of all political committees or party committees supported in any way by the committee;

[2007, c. 443, Pt. A, §36 (AMD) .]

3. **Identification of referendum or initiated petition.** The referenda or initiated petitions that the committee supports or opposes;

[2007, c. 443, Pt. A, §36 (AMD) .]

4. **Itemized expenditures.** An itemization of each expenditure made to initiate or influence any campaign, including the date, payee and purpose of the expenditure; the name of each candidate, campaign, political committee, political action committee or party committee supported or opposed; and each referendum or initiated petition supported or opposed by the expenditure. If expenditures were made to a person described in section 1012, subsection 3, paragraph A, subparagraph (4), the report must contain the name of the person; the amount spent by that person on behalf of the candidate, campaign, political committee, political action committee, party committee, referendum or initiated petition, including, but not limited to, expenditures made during the signature gathering phase; the reason for the expenditure; and the date of the expenditure. The commission may specify the categories of expenditures that are to be reported to enable the commission to closely monitor the activities of political action committees;

[2011, c. 389, §46 (AMD) .]

5. **Aggregate expenditures.** An aggregation of expenditures and cumulative aggregation of expenditures to a candidate, campaign, political committee, political action committee, party committee, referendum or initiated petition;

[2007, c. 443, Pt. A, §36 (AMD) .]

6. **Identification of contributions.** Names, occupations, places of business and mailing addresses of contributors who have given more than $50 to the political action committee in the reporting period and the amount and date of each contribution, except that an organization qualifying as a political action committee under section 1052, subsection 5, paragraph A, subparagraph (5) is required to report only those contributions made to the organization for the purpose of influencing a ballot question or the nomination or election of a candidate to political office and all transfers to or funds used to support the political action committee from the general treasury of the organization; and

[2011, c. 389, §47 (AMD) .]

7. **Other expenditures.** Operational expenses and other expenditures that are not made on behalf of a candidate, committee or campaign, except that an organization qualifying as a political action committee under section 1052, subsection 5, paragraph A, subparagraph (5) is required to report only those expenditures made for the purpose of influencing a ballot question or the nomination or election of a candidate to political office.

21-A §1062-A. FAILURE TO FILE ON TIME

1. Registration. A political action committee required to register under section 1053 or 1053-B or a ballot question committee required to register under section 1056-B that fails to do so or that fails to provide the information required by the commission for registration may be assessed a fine of $250.

[2009, c. 190, Pt. A, §28 (AMD) .]

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 6, the commission shall determine whether a required report satisfies the requirements for timely filing. The commission may waive a penalty in whole or in part if it is disproportionate to the level of experience of the person filing the report or to 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 of the committee treasurer 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, §9 (AMD).]

B. An error by the commission staff; or [1999, c. 729, §9 (AMD).]

C. 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. [2007, c. 443, Pt. A, §38 (AMD).]

[2009, c. 190, Pt. A, §29 (AMD) .]

3. 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%; [1995, c. 483, §21 (NEW).]

B. For the 2nd violation, 3%; and [1995, c. 483, §21 (NEW).]

C. For the 3rd and subsequent violations, 5%. [1995, c. 483, §21 (NEW).]

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

[2007, c. 443, Pt. A, §39 (AMD) .]

4. Maximum penalties. The maximum penalty under this subchapter is $10,000 for reports required under section 1056-B or section 1059, 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, §49 (AMD) .]

5. Request for a commission determination. If the commission staff finds that a political action committee has failed to file a report required under this subchapter, the commission staff shall mail a notice by certified mail to the treasurer of the political action committee within 3 business days following the filing deadline informing the treasurer that a report was not received. If a political action committee files a report required under this subchapter late, a notice of preliminary penalty must be forwarded to the treasurer of the political action committee whose report is not received by 11:59 p.m. on the deadline date, informing the treasurer of the commission staff finding of violation and preliminary penalty calculated under subsection 3 and providing the treasurer with an opportunity to request a determination by the commission. The notice must be sent by certified mail. A request for determination must be made within 14 calendar days of receipt of the commission's notice. The 14-day period during which a determination may be requested begins on the day a recipient signs for the certified mail notice of the proposed penalty. If the certified letter is refused or left unclaimed at the post office, the 14-day period begins on the day the post office indicates it has given first notice of a certified letter. A principal officer or treasurer requesting a determination may either appear in person or designate a representative to appear on the principal officer's or treasurer'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.

[2009, c. 302, §8 (RPR) .]

6. Final notice of penalty. After a commission meeting, notice of the final determination of the commission and the penalty, if any, imposed pursuant to this subchapter must be sent to the principal officer and the treasurer of the political action 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 principal officer and to the treasurer of the political action committee. A detailed summary of all notices must be provided to the commission.

[2009, c. 302, §9 (AMD) .]

7. List of late-filing committees. The commission shall prepare a list of the names of political action committees that are late in filing a report required under section 1059, subsection 2, paragraph B, subparagraph (1) or section 1059, subsection 2, paragraph C or D within 30 days of the date of the election and shall make that list available for public inspection.

[2007, c. 443, Pt. A, §41 (AMD) .]

8. Failure to file. A person who fails to file a report as required by this subchapter within 30 days of the filing deadline is guilty of a Class E crime, except that, if a penalty pursuant to subsection 8-A is assessed and collected by the commission, the State may not prosecute a violation under this subsection.

[2003, c. 628, Pt. A, §8 (AMD) .]

8-A. Penalties for failure to file report. The commission may assess a civil penalty for failure to file a report required by this subchapter. The maximum penalty for failure to file a report required under section 1056-B or section 1059 is $10,000.

[2009, c. 190, Pt. A, §31 (AMD) .]

9. 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, §10 (RPR) .]

21-A §1004-A. PENALTIES

The commission may assess the following penalties in addition to the other monetary sanctions authorized in this chapter. [2003, c. 628, Pt. A, §1 (NEW).]

1. Late campaign finance report. A person that files a late campaign finance report containing no contributions or expenditures may be assessed a penalty of no more than $100.

[2003, c. 628, Pt. A, §1 (NEW) .]

2. Contribution in excess of limitations. A person that accepts or makes a contribution that exceeds the limitations set out in section 1015, subsections 1 and 2 may be assessed a penalty of no more than the amount by which the contribution exceeded the limitation.

[2003, c. 628, Pt. A, §1 (NEW) .]

3. Contribution in name of another person. A person that makes a contribution in the name of another person, or that knowingly accepts a contribution made by one person in the name of another person, may be assessed a penalty not to exceed $5,000.

[2003, c. 628, Pt. A, §1 (NEW) .]

4. Substantial misreporting. A person that files a campaign finance report that substantially misreports contributions, expenditures or other campaign activity may be assessed a penalty not to exceed $5,000.

[2003, c. 628, Pt. A, §1 (NEW) .]

☆ **5. Material false statements.** A person that makes a material false statement or that makes a statement that includes a material misrepresentation in a document that is required to be submitted to the commission, or that is submitted in response to a request by the commission, may be assessed a penalty not to exceed $5,000.

[2005, c. 301, §6 (AMD) .]

When the commission has reason to believe that a violation has occurred, the commission shall provide written notice to the candidate, party committee, political action committee, committee treasurer or other respondent and shall afford them an opportunity to appear before the commission before assessing any penalty. In determining any penalty under subsections 3, 4 and 5, the commission shall consider, among other things, the level of intent to mislead, the penalty necessary to deter similar misconduct in the future and the harm suffered by the public from the incorrect disclosure. 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. [2009, c. 302, §1 (AMD).]

Penalties assessed pursuant to this section that have 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, §2 (NEW).]

SECTION HISTORY
2003, c. 628, §A1 (NEW). 2005, c. 301, §6 (AMD). 2007, c. 443, Pt. A, §2 (AMD). 2009, c. 302, §§1, 2 (AMD).

FAX REC'D 5/19/10

Attachment #4

COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES
Mail: 135 State House Station, Augusta, Maine 04333
Office: 242 State Street, Augusta, Maine

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

REGISTRATION: POLITICAL ACTION COMMITTEES

A political action committee must register with the Commission within 7 days of making expenditures to influence an 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.**

An Initial Campaign Finance Report must accompany this form - Political Action Committees must report all contributions and expenditures, whether cash or in-kind, made since January 1st of the reporting year. Be sure to include expenditures such as those associated with the collection of signatures, paid staff time, travel reimbursement, and fundraising expenses.

Within 10 days of a change in PAC information an amended registration form must be submitted to the Commission. The committee must also file an updated registration every election year between January 1st and March 1st.

Is this an amendment? ☐ Yes ☑ No

ALL SECTIONS OF THIS FORM MUST BE COMPLETED.

COMMITTEE INFORMATION	
Committee name: Green Jobs for ME	Acronym:
Mailing address: PO Box 641	Phone: 207-332-4768
City, zip code: Lewiston, ME 04243	Fax:
E-mail: zeusstav@yahoo.com	Website:

TREASURER INFORMATION	
Name: Peter D. Robinson	Phone: (207) 783-8341
Mailing address: PO Box 641	
City, zip code: Lewiston, ME 042433	E-mail: robinsonpd@earthlink.net

PRINCIPAL OFFICER INFORMATION	
Name: Stavros J. Mendros	Title: Manager
Mailing address: PO Box 641	Phone: 207-332-4768
City, zip code: Lewiston, ME 04243	
Name:	Title:
Mailing address:	Phone:
City, zip code:	

Rev 03/09

ALTERNATE E-MAIL ADDRESSES
To receive filing reminders and important information from the Commission.

1.	2.

PRIMARY FUNDRAISERS AND DECISION MAKERS
Identify any candidates, Legislators or other individuals who are the primary fundraisers and decision makers for the committee.

1.	2.
Stavros J. Mendros	Peter D. Robinson
3.	4.
5.	6.

COMMITTEE MAILING ADDRESS
Correspondence will be mailed to this address.

Street address or PO Box
PO Box 641

City, zip code
Lewiston, ME 04243

FORM OF ORGANIZATION
Name the form or structure of organization, i.e., cooperative, corporation, voluntary association, partnership, etc.

Form of organization	Date of origin/incorporation
Voluntary association	5/19/10

STATEMENT OF SUPPORT OR OPPOSITION
Indicate whether the committee supports or opposes a candidate, political committee, referendum, initiated petition or campaign. If unknown at the time of registration, the committee must inform the Commission as soon as this information is known.

SUPPORT	State-wide initiated petition to legalize a slot-machine facility in Lewiston, where a portion of the slot machine proceeds are earmarked for economic development projects in Maine.
OPPOSE	

SIGNATURE OF PRINCIPAL PAC OFFICER OR TREASURER

Signature	Title
Peter D. Robinson	Treasurer
Print name	Date
Peter D. Robinson	5/19/10

IMPORTANT NOTICE:

An initial campaign finance report must be filed with the Commission at the time of registration.

Rev 03/09

Attachment #5

RECEIVED
OCT 17 2011
Maine Ethics Commission

COMMISSION ON GOVERNMENTAL ETHICS AND ELE
Mail: 135 State House Station, Aug
Office: 45 Memorial Circle, Augusta, Maine

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

REGISTRATION: POLITICAL ACTION COMMITTEES

A political action committee must register with the Commission within 7 days of making expenditures to influence an election, including unpaid obligations, or receives contributions 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.**

An Initial Campaign Finance Report must accompany this form - Political Action Committees must report all contributions and expenditures, whether cash or in-kind, made since January 1st of the reporting year. Be sure to include expenditures such as those associated with the collection of signatures, paid staff time, travel reimbursement, and fundraising expenses.

Within 10 days of a change in PAC information an amended registration form must be submitted to the Commission. The committee must also file an updated registration every election year between January 1st and March 1st.

Is this an amendment? ☐ **Yes** ☒ **No**

ALL SECTIONS OF THIS FORM MUST BE COMPLETED.

COMMITTEE INFORMATION	
Committee name: People for Lewiston-Auburn Committee	Acronym:
Mailing address: 134 Main St.	Phone: 207-402-5401
City, zip code: Lewiston, ME 04240	Fax:
E-mail: mayorgilbert@yesforlewiston.org	Website:

TREASURER INFORMATION	
Name: William Welch	Phone: 207-402-5401
Mailing address: 134 MAIN St.	
City, zip code: Lewiston, ME 04240	E-mail: chiefwelch@yesforlewiston.org

PRINCIPAL OFFICER INFORMATION	
Name: William Welch	Title:
Mailing address: Same	Phone:
City, zip code:	
Name: Laurent F. Gilbert, Sr.	Title:
Mailing address: 27 Pine Street	Phone: 207-513-3000
City, zip code: Lewiston, ME 04240	

Rev 03/09

ALTERNATE E-MAIL ADDRESSES

To receive filing reminders and important information from the Commission.

1. robinsonpd@earthlink.net	2.

PRIMARY FUNDRAISERS AND DECISION MAKERS

Identify any candidates, Legislators or other individuals who are the primary fundraisers and decision makers for the committee.

1. William Welch	2. Belinda Gerry
3. Laurent F. Gilbert, Sr.	4. SCOTT Lansley
5. Larry Poulin	6. Peter Robinson + Stavros Mendros

COMMITTEE MAILING ADDRESS

Correspondence will be mailed to this address.

Street address or PO Box: 134 Main ST.

City, zip code: Leviston, ME 04240

FORM OF ORGANIZATION

Name the form or structure of organization, i.e., cooperative, corporation, voluntary association, partnership, etc.

Form of organization: Voluntary Association	Date of origin/incorporation: 10/4/11

STATEMENT OF SUPPORT OR OPPOSITION

Indicate whether the committee supports or opposes a candidate, political committee, referendum, initiated petition or campaign. If unknown at the time of registration, the committee must inform the Commission as soon as this information is known.

SUPPORT	Question 3: An Act Regarding Establishing A Slot-Machine Facility.
OPPOSE	

SIGNATURE OF PRINCIPAL PAC OFFICER OR TREASURER

Signature: William E. Welch	Title: Treasurer
Print name: William E. Welch	Date: Oct 8, 2011

IMPORTANT NOTICE:

An initial campaign finance report must be filed with the Commission at the time of registration.

COMMISSION ON GOVERNMENTAL ETHICS AND ELEC
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

2011 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE INFORMATION	
GREEN JOBS FOR ME PO BOX 641 LEWISTON, ME 04243	TEL: (207)332-4768 FAX: EMAIL: zeusstav@yahoo.com

TREASURER	
PETER D. ROBINSON PO BOX 641 LEWISTON, ME 04243	TEL: (207)783-8341 EMAIL: robinsonpd@earthlink.net

TYPE OF REPORT	DUE DATE	REPORTING PERIOD
QUARTERLY - OCTOBER	10/5/2011	7/1/2011 - 9/30/2011

NO FINANCIAL ACTIVITY IN THIS REPORTING PERIOD FOR SCHEDULES A1, C, D

CERTIFICATION

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

REPORT FILED BY: PETER D ROBINSON ON BEHALF OF PETER ROBINSON, TREASURER
REPORT FILED ON: October 05, 2011

IF THIS REPORT IS FILED BY AN AUTHORIZED AGENT OF THE COMMITTEE, THE TREASURER AND AGENT ARE LIABLE FOR ANY VIOLATIONS OF MAINE CAMPAIGN FINANCE LAW (21-A M.R.S.A. CHAPTER 13) AND THE COMMISSION'S RULES THAT MAY RESULT FROM THE FILING OF A FALSE OR INACCURATE REPORT.

UNSWORN FALSIFICATION IS A CLASS D CRIME (17-A M.R.S.A. § 453).

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 = Individuals**
  - **2 = Commercial Sources**
  - **3 = Political Action Committees**
  - **4 = Party Committees**
  - **5 = Candidate Committees**
  - **6 = Unitemized Contributions**

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	TYPE	AMOUNT
08/12/2011	GT SOURCE 1640 AIRPORT ROAD SUITE 105 KENNESAW GA 30144		2	$5,000.00
09/22/2011	GT SOURCE 1640 AIRPORT ROAD SUITE 105 KENNESAW GA 30144		2	$26,000.00
09/01/2011	GT SOURCE 1640 AIRPORT ROAD SUITE 105 KENNESAW GA 30144		2	$2,200.00
			TOTAL CASH CONTRIBUTIONS ⇨	$33,200.00

GREEN JOBS FOR ME

SCHEDULE B ONLY

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		

Only these expenditure types require a remark: CNS, OTH, PRO.

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
08/12/2011	OLYMPIC CONSULTING P.O. BOX 641 LEWISTON, ME 04243	Literature, banners	LIT	$5,000.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
09/22/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206		POL	$16,000.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
09/22/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206	Planning fees	CNS	$7,500.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
09/01/2011	AG ARTISTIC COMMUNICATIONS 11863 HIDDEN HOLLOW DRIVE GRAND HAVEN, MI 49417		WEB	$2,200.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
			TOTAL EXPENDITURES ⇨	$30,700.00

GREEN JOBS FOR ME

SCHEDULE B- 1 ONLY

SCHEDULE B - 1
OPERATING EXPENDITURES

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		

Only these expenditure types require a remark: CNS, OTH, PRO.

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
09/22/2011	L-A ECONOMIC GROWTH COUNCIL 415 MAIN STREET LEWISTON, ME 04240	Office rent	OFF	$2,500.00
09/22/2011	TD BANK 217 MAIN STREET LEWISTON, ME 04240	Transfer fees	OTH	$25.00
			TOTAL EXPENDITURES ⇨	$2,525.00

SCHEDULE F
SUMMARY SCHEDULE

CASH ACTIVITY		
RECEIPTS	**TOTAL FOR THIS PERIOD**	**TOTAL FOR YEAR**
1. CASH CONTRIBUTIONS (Schedule A)	$33,200.00	$41,654.95
2. OTHER CASH RECEIPTS (interest, etc.)	$0.00	$0.00
3. LOANS (Schedule C, new loans and additional amounts loaned)	$0.00	$0.00
4. TOTAL RECEIPTS (lines 1+2+3)	$33,200.00	$41,654.95
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (Schedule B)	$30,700.00	$38,924.95
6. OPERATING EXPENDITURES (Schedule B-1)	$2,525.00	$2,705.00
7. LOAN REPAYMENTS (Schedule C)	$0.00	$0.00
8. TOTAL PAYMENTS (lines 5+6+7)	$33,225.00	$41,629.95
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD (from last report)	$343.23	
10. *PLUS* TOTAL RECEIPTS THIS PERIOD (line 4 above)	$33,200.00	
11. *MINUS* TOTAL PAYMENTS THIS PERIOD (line 8 above)	$33,225.00	
12. CASH BALANCE AT END OF PERIOD	$318.23	
OTHER ACTIVITY		
	TOTAL FOR THIS PERIOD	**TOTAL FOR YEAR**
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	

COMMISSION ON GOVERNMENTAL ETHICS AND ELEC
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

2011 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE INFORMATION	
PEOPLE OF LEWISTON AND AUBURN COMMITTEE 134 MAIN STREET LEWISTON, ME 04240	TEL: (207)402-5401 FAX: EMAIL: mayorgilbert@yesforlewiston.org

TREASURER	
WILLIAM WELCH 134 MAINE STREET LEWISTON, ME 04240	TEL: (207)402-5401 EMAIL: chiefwelch@yesforlewiston.org

TYPE OF REPORT	DUE DATE	REPORTING PERIOD
11-DAY PRE-GENERAL	10/28/2011	10/13/2011 - 10/25/2011

NO FINANCIAL ACTIVITY IN THIS REPORTING PERIOD FOR SCHEDULES A1, B1, C, D

CERTIFICATION

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

REPORT FILED BY: WILLIAM WELCH
REPORT FILED ON: October 28, 2011

IF THIS REPORT IS FILED BY AN AUTHORIZED AGENT OF THE COMMITTEE, THE TREASURER AND AGENT ARE LIABLE FOR ANY VIOLATIONS OF MAINE CAMPAIGN FINANCE LAW (21-A M.R.S.A. CHAPTER 13) AND THE COMMISSION'S RULES THAT MAY RESULT FROM THE FILING OF A FALSE OR INACCURATE REPORT.

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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 = Individuals**
  - **2 = Commercial Sources**
  - **3 = Political Action Committees**
  - **4 = Party Committees**
  - **5 = Candidate Committees**
  - **6 = Unitemized Contributions**

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	TYPE	AMOUNT
10/13/2011	GT SOURCE 1640 AIRPORT ROAD SUITE 105 KENNESAW GA 30144		2	$25,000.00
10/13/2011	GT SOURCE 1640 AIRPORT ROAD SUITE 105 KENNESAW GA 30144		2	$140,000.00
10/18/2011	GT SOURCE 1640 AIRPORT ROAD SUITE 105 KENNESAW GA 30144		2	$160,000.00
10/13/2011	GREAT FALLS RECREATION & REDEVELOPMENT, LLC P.O. BOX 641 LEWISTON ME 04240		2	$765.43
			TOTAL CASH CONTRIBUTIONS ⇨	$325,765.43

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		

Only these expenditure types require a remark: CNS, OTH, PRO.

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/13/2011	OLYMPIC CONSULTING P.O. BOX 641 LEWISTON, ME 04243	Literature & lit drop, signs & sign placement	LIT	$26,765.43
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
10/25/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206	Planning fees	CNS	$10,000.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
10/20/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206		TVN	$60,510.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
10/18/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206		TVN	$42,684.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			

10/13/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206		TVN	$33,420.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
10/13/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206	Data purchase	OTH	$4,600.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
10/13/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206		RAD	$5,882.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
10/13/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206		LIT	$6,801.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
10/13/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206	Street signs	LIT	$15,579.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
			TOTAL EXPENDITURES ⇨	$206,241.43

SCHEDULE F
SUMMARY SCHEDULE

CASH ACTIVITY		
RECEIPTS	**TOTAL FOR THIS PERIOD**	**TOTAL FOR YEAR**
1. CASH CONTRIBUTIONS (Schedule A)	$325,765.43	$325,765.43
2. OTHER CASH RECEIPTS (interest, etc.)	$0.00	$0.00
3. LOANS (Schedule C, new loans and additional amounts loaned)	$0.00	$0.00
4. TOTAL RECEIPTS (lines 1+2+3)	$325,765.43	$325,765.43
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (Schedule B)	$206,241.43	$206,241.43
6. OPERATING EXPENDITURES (Schedule B-1)	$0.00	$0.00
7. LOAN REPAYMENTS (Schedule C)	$0.00	$0.00
8. TOTAL PAYMENTS (lines 5+6+7)	$206,241.43	$206,241.43
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD (from last report)	$0.00	
10. *PLUS* TOTAL RECEIPTS THIS PERIOD (line 4 above)	$325,765.43	
11. *MINUS* TOTAL PAYMENTS THIS PERIOD (line 8 above)	$206,241.43	
12. CASH BALANCE AT END OF PERIOD	$119,524.00	
OTHER ACTIVITY		
	TOTAL FOR THIS PERIOD	**TOTAL FOR YEAR**
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	

COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES
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2011 CAMPAIGN FINANCE REPORT

FOR POLITICAL ACTION COMMITTEES

COMMITTEE INFORMATION	
PEOPLE OF LEWISTON AND AUBURN COMMITTEE 134 MAIN STREET LEWISTON, ME 04240	TEL: (207)402-5401 FAX: EMAIL: mayorgilbert@yesforlewiston.org

TREASURER	
WILLIAM WELCH 134 MAINE STREET LEWISTON, ME 04240	TEL: (207)402-5401 EMAIL: chiefwelch@yesforlewiston.org

TYPE OF REPORT	DUE DATE	REPORTING PERIOD
42-DAY POST-GENERAL	12/20/2011	10/26/2011 - 12/13/2011

NO FINANCIAL ACTIVITY IN THIS REPORTING PERIOD FOR SCHEDULES C, D

CERTIFICATION

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

REPORT FILED BY: WILLIAM WELCH
REPORT FILED ON: December 20, 2011

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PEOPLE OF LEWISTON AND AUBURN COMMITTEE

SCHEDULE A ONLY

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 = Individuals**
  - **2 = Commercial Sources**
  - **3 = Political Action Committees**
  - **4 = Party Committees**
  - **5 = Candidate Committees**
  - **6 = Unitemized Contributions**

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	TYPE	AMOUNT
10/28/2011	GREAT FALLS RECREATION & REDEVELOPMENT, LLC P.O. BOX 641 LEWISTON ME 04240		2	$19,898.34
10/26/2011	GT SOURCE 1640 AIRPORT ROAD SUITE 105 KENNESAW GA 30144		2	$53,419.73
			TOTAL CASH CONTRIBUTIONS ⇨	$73,318.07

PEOPLE OF LEWISTON AND AUBURN COMMITTEE

SCHEDULE A-1 ONLY

SCHEDULE A - 1
IN-KIND CONTRIBUTIONS

- In-kind contributions are goods and services (including facilities) that a committee 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 committee or supporters if the campaign does not expect to reimburse the committee or supporter. These contributions may come from the committee, supporters, PACs, party committees, or other entities.
- For contributors who gave more than $50, the name, address, occupation, and employer must be reported. If "information requested" is listed instead of occupation and employer, the ccommittee 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 committee received a discount on goods and services, the amount of the discount must be reported as an in-kind contribution.
- Contributor Types
  - 1 = Individuals
  - 2 = Commercial Sources
  - 3 = Political Action Committees
  - 4 = Party Committees
  - 5 = Candidate Committees
  - 6 = Unitemized Contributions

DATE RECEIVED	CONTRIBUTOR	OCCUPATION AND EMPLOYER	DESCRIPTION (of goods, services, facilitites, or discounts received)	TYPE	VALUE (estimated fair market value)
10/27/2011	HILTON GARDEN INN 14 GREAT FALLS PLAZA AUBURN ME 04210		FUNCTION ROOM	2	$830.00
11/08/2011	HILTON GARDEN INN 14 GREAT FALLS PLAZA AUBURN ME 04210		FUNCTION ROOM	2	$830.00
				TOTAL IN-KIND CONTRIBUTIONS ⇨	$1,660.00

PEOPLE OF LEWISTON AND AUBURN COMMITTEE

SCHEDULE B ONLY

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		

Only these expenditure types require a remark: CNS, OTH, PRO.

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
10/29/2011	OLYMPIC CONSULTING P.O. BOX 641 LEWISTON, ME 04243		SAL	$5,084.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
11/01/2011	THE MAINE EDGE P.O. BOX 2639 BANGOR, ME 04402		PRT	$976.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
11/01/2011	TWIN CITY TIMES 33 DUNN STREET AUBURN, ME 04240		PRT	$1,026.00
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			
11/01/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206		PHO	$739.10
	PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY			

11/02/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	PHO	$45,130.66
11/03/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	TVN	$44,645.00
11/03/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	TVN	$64,504.94
11/03/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	WEB	$1,000.00
11/03/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	RAD	$660.00
11/05/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	PHO	$4,742.35
11/07/2011	DOME MESSAGING 2776 S. ARLINGTON MILL DRIVE SUITE ARLINGTON, VA 22206 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	PHO	$10,447.25
11/03/2011	LEWISTON SUNJOURNAL P.O. BOX 4400 LEWISTON, ME 04243 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	PRT	$5,091.99

11/04/2011	NASSAU BROADCASTING 250 CENTER STREET AUBURN, ME 04240 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	RAD	$2,080.00
11/08/2011	LEWISTON SUNJOURNAL P.O. BOX 4400 LEWISTON, ME 04243 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	PRT	$431.25
11/14/2011	OLYMPIC CONSULTING P.O. BOX 641 LEWISTON, ME 04243 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	SAL	$3,500.00
11/07/2011	LABOR READY 220 LISBON STREET LEWISTON, ME 04240 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	SAL	$1,709.10
12/13/2011	UNCLE ANDY'S DIGEST P.O. BOX 3363 AUBURN, ME 04212 PAYMENT TO SUPPORT: 2011 QUESTION #3: STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY STATEWIDE: AN ACT REGARDING ESTABLISHING A SLOT MACHINE FACILITY	PRT	$604.39
		TOTAL EXPENDITURES ⇨	$192,372.03

PEOPLE OF LEWISTON AND AUBURN COMMITTEE

SCHEDULE B- 1 ONLY

SCHEDULE B - 1
OPERATING EXPENDITURES

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		

Only these expenditure types require a remark: CNS, OTH, PRO.

DATE OF EXPENDITURE	PAYEE	REMARK	TYPE	AMOUNT
11/13/2011	OXFORD NETWORKS 491 LISBON STREET LEWISTON, ME 04240		OFF	$470.04
			TOTAL EXPENDITURES ⇨	$470.04

SCHEDULE F
SUMMARY SCHEDULE

CASH ACTIVITY		
RECEIPTS	**TOTAL FOR THIS PERIOD**	**TOTAL FOR YEAR**
1. CASH CONTRIBUTIONS (Schedule A)	$73,318.07	$399,083.50
2. OTHER CASH RECEIPTS (interest, etc.)	$0.00	$0.00
3. LOANS (Schedule C, new loans and additional amounts loaned)	$0.00	$0.00
4. TOTAL RECEIPTS (lines 1+2+3)	$73,318.07	$399,083.50
EXPENDITURES		
5. EXPENDITURES TO SUPPORT OR OPPOSE (Schedule B)	$192,372.03	$398,613.46
6. OPERATING EXPENDITURES (Schedule B-1)	$470.04	$470.04
7. LOAN REPAYMENTS (Schedule C)	$0.00	$0.00
8. TOTAL PAYMENTS (lines 5+6+7)	$192,842.07	$399,083.50
CASH SUMMARY		
9. CASH BALANCE AT BEGINNING OF PERIOD (from last report)	$119,524.00	
10. *PLUS* TOTAL RECEIPTS THIS PERIOD (line 4 above)	$73,318.07	
11. *MINUS* TOTAL PAYMENTS THIS PERIOD (line 8 above)	$192,842.07	
12. CASH BALANCE AT END OF PERIOD	$0.00	
OTHER ACTIVITY		
	TOTAL FOR THIS PERIOD	**TOTAL FOR YEAR**
13. IN-KIND CONTRIBUTIONS (Schedule A-1)	$1,660.00	$1,660.00
14. TOTAL LOAN BALANCE AT END OF PERIOD (Schedule C)	$0.00	
15. TOTAL UNPAID DEBTS AT END OF PERIOD (Schedule D)	$0.00	

CasinosNO!

Don't Gamble Away Maine's Future

RECEIVED
DEC 23 2011
Maine Ethics Commission

Dec. 22, 2011

Jonathan Wayne
Executive Director
Maine Commission on Governmental Ethics and Election Practices
135 SHS
Augusta, ME 04333

Dear Mr. Wayne,

I feel compelled to make a formal complaint on behalf of Casinos*NO!* against the major supporters of the proposed Lewiston casino. We have several questions about the funding source of two PACs involved in the casino campaign, and would like the Commission to examine the enclosed information to determine if violations of campaign finance laws have occurred.

Toward the end of the 2011 casino campaign, I came into possession of the enclosed document that appears to be an agreement between Great Falls Recreation & Development LLC (the partners involved in the proposed Lewiston casino) and an outfit called M5, which is based in Bethesda, MD. All the members of Great Falls LLC signed the document, but this copy does not include the signatures of the M5 principles.

Among the many provisions of the agreement is the condition on page 8, #9 that states that M5 "shall develop, plan, manage and pay for any campaign efforts to cause the passage of the 2011 Statewide Ballot Measure." In addition, the agreement states that M5 will contract with Dome Messaging of Arlington, Virginia, and contribute "at least $100,000 to Green Jobs for Maine," the original Lewiston casino PAC.

Neither the campaign finance reports for Green Jobs for Maine or the People of Lewiston and Auburn Committee (the subsequent pro-casino PAC) lists any contributions from M5. However, one of the principals of M5 is a person named Dwayne Graham, according to a report by MPBN (enclosed). Graham is the CEO of a company in Georgia called GT Source, which makes parts for slot machines. GT Source is a major contributor to the Lewiston casino PACs. According to the reports by Green Jobs for Maine and the People of Lewiston and Auburn Committee, GT Source contributed more than $400,000 to the two PACs.

Our question is, what was the true source of the funds for the PAC? Was it GT Source or M5? Was GT Source merely the conduit of funds from M5, and if so, is that a violation of campaign finance laws?

P.O. Box 4581
Portland, Maine 04112
www.CasinosNo.org

Further complicating the matter, when the reporter for Maine Public Radio attempted to contact Scott Nash, one of other the principals of M5, his answering machine contained a message identifying his office outside Washington, DC as the People of Lewiston and Auburn Committee. Nash and M5 apparently expended some resources to support passage of the Lewiston casino that are unreported on the casino PAC's finance disclosure form.

Also, as the signed agreement stipulates, a company called Dome Messaging was paid by the casino PACs, apparently to manage the campaign. The records show that Dome Messaging of Arlington, VA received approximately $375,000 to produce and air television ads and create other material. However, it is impossible to determine who or what Dome Messaging is. The firm has a website (http://domemessaging.com) with no information about the company or its principals, and the address for the company turns out to be a blind post office box in a UPS store (see enclosed). A Google search turns up no information on Dome Messaging or any other campaign that the firm has been involved in.

What's the point of having campaign finance disclosure laws if it's impossible for the public to determine on those forms who or what is really behind a campaign that is spending hundreds of thousands of dollars to persuade voters in Maine? If M5 and/or Scott Nash (who has had previous dealings in Maine involving slot machines) were behind the campaign for a Lewiston casino, that information would be important to Maine voters prior to the election. And what is the reason why the Lewiston casino promoters hired a firm that is cloaked in secrecy to run its campaign?

Further investigation into this matter will determine if the state's campaign finance laws were intentionally violated in order to keep the names of the people who were actually behind the casino from the public.

Thank you for your attention to this matter.

Sincerely,

Dennis Bailey
Casinos*NO!*

cc. Walter F. McKee, Chair

P.O. Box 4581
Portland, Maine 04112
www.CasinosNo.org

Questions Raised About Potential Lewiston Casino Partner

2

11/03/2011 Reported By:

Just days before voters head to the polls, there are new questions being raised about who is behind the effort to develop a proposed casino in downtown Lewiston. A group of local investors who helped get the measure on the ballot say they haven't signed a contract with a casino operator. But an unofficial, confidential agreement apparently signed by several of the principals appears to show they've made an offer. And the potential partner is raising red flags with casino critics.

Related Media	
Questions Raised About Potential Lewiston Casino P	Listen *Duration: 4:36*

The most recent campaign spending reports filed with the Maine Ethics Commission show a Georgia-based company called GT Source has sunk more than $325,000 into passage of Question 3, the Lewiston casino. GT Source stands for "Gaming Technology Source." According to its website, the company is a "complete hardware solutions provider" for the gaming industry.

CEO Dwayne Graham did not return a telephone call to MPBN for this story. But in an interview with the Lewiston Sun Journal, Graham said he is helping finance the campaign because his company sees the proposed casino as a way to sell slot machines in Maine, something that one casino critic says is not uncommon.

"GT Source made our illustrious list of predatory partners," says Les Bernal, the executive director of a national group called the "Stop Predatory Gambling Foundation," that tries to show how the government's promotion and profiting from gambling has been a failure.

"We essentially went through and identified all of these companies in America that the public knows virtually nothing about, who are really big players in driving this massive government predatory gambling program, running essentially the best something-for-nothing scheme ever invented."

An SEC filing shows GT Source's Dwayne Graham is also one of the principals of a company called M Five Inc. And in documents obtained by MPBN, M Five appears to be a potential gaming partner with the local investment group known as Great Falls Recreation and Development.

The agreement, which appears to show the signatures of members of the local group, but not the M Five principals, suggests that M Five would pay $5 million for the operation of the casino out of a downtown mill building, as well as a share of the casino profits to the Great Falls partners in the future.

Dr. Ron Chicoine, one of the local investors, says his group has not signed a contract for any deal. As for making an offer, Chicoine had this to say: "Eventually we're going to be looking to work with professionals who know this business, but right now we have no signed contract with anybody. Any deals or offers we would make would be confidential and when they were completed, then we'd have two parties signing on it, you know?"

Two of the other partners listed as principals of M Five are Scott Nash and Ryan Hill. Nash is listed a vice president at a Washington D.C. area company called Incentovation, which was previously involved in an effort to bring electronic pull tab machines to the Penobscot Nation for use in high stakes beano.

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Last year former Maine Attorney General Janet Mills found that the machines were outside the scope of what the tribe is permitted to operate, so the system was never licensed. Attempts to reach Scott Nash at his office were unsuccessful, but the recorded message on his answering machine appears to show he is also tied to the Lewiston casino campaign.

Scott Nash answering machine: "You've reached the People of Lewiston Auburn Committee, please leave a message, or if you'd like to sign, please leave your address. Thank you."

The People of Lewiston Auburn Committee is the political action committee that GT Source has invested more than $300,000 in so far. Dennis Bailey, of CasinosNo, says the possible involvement of M Five should raise a red flag for voters since the company has spent much more on the casino effort than any of the local investors.

"They're being sold this casino--as we've seen in other campaigns--sold it, basically, as a local effort by local investors, by local residents and people in the community, and come to find out, in this case it appears that it's already been sold, or at least they have an agreement to sell this to an outside source that we know nothing about."

Lewiston Mayor Larry Gilbert, who is the spokesman for the casino campaign, says he has no knowledge of M Five or a possible deal with local investors. And he points out that the Lewiston City Council must approve any potential developer of the building, and the state will have the final say on any casino operator.

"So whoever will be the licensee has to go through a stringent licensing process, so certainly the state of Maine and the Lewiston City Council will be very vigilant in their process," Gilbert says.

The casino, which already has the support of the Lewiston City Council, is expected to generate about $1 million a year for the city if it is approved by voters statewide.

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Sun Journal

Georgia-based slot machine maker helps back Lewiston casino campaign

By Scott Thistle, Regional Editor
Published on Sunday, Oct 23, 2011 at 12:12 am | Last updated on Sunday, Oct 23, 2011 at 12:12 am

2
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LEWISTON — A group hoping to set up a casino in Bates Mill No. 5 has received its first batch of corporate donations from an out-of-state company, according to state campaign finance reports.

Green Jobs for ME, a political action committee chaired by Stavros Mendros and formed to support bringing a casino to Bates Mill No. 5, is being partially funded by a Georgia-based maker of slot machines and other gaming equipment, a report on file with the Maine Ethics Commission shows.

Dwayne Graham, chief executive officer of GTSource Corp., a Kennesaw, Ga. company said Friday his company was helping finance the campaign because he liked the concept of revitalizing the mill and making the downtown more vibrant.

Graham also said his company saw the proposed casino as a chance to sell machines in Maine.

"That's what we would hope, it would be a new market for us to go into," Graham said. Graham said he visited the city in the spring and summer and liked what he saw, he also liked that much of the revenue from the casino would go to good causes.

"I fell in love with the place," Graham said. "I'm from a small town myself and I liked that much of the casino revenue would be going back into the community to things like veterans groups, Meals on Wheels and those kind of programs."

Voters statewide will decide a ballot question in November that, if approved, would legalize a casino with slot machines and table games in Lewiston's downtown.

So far Green Jobs for ME has been funded by individuals, most of them principal investors in the company that would set up and own the casino, Great Falls Recreation.

Graham said he hoped to help the campaign financially but said he wouldn't disclose how much.

"We're looking to help out as much as we can, but I do have a limit and I'm not going to discuss what that is."

In its Oct. 5 filing Green Jobs for ME reports GTSource donated $33,200 to the campaign in August and September.

Those donations came in three payments including a $5,000 payment on Aug. 12, a $2,200 payment on Sept. 1 and a $26,000 payment on Sept. 22.

In early October Mendros said that a slot machine manufacturing company would help bankroll the campaign in exchange for the rights to install its machines in the Lewiston casino, were it approved by voters.

Meanwhile another company, Dome Messaging, appears for the first time on the expenditure side of the PAC's required financial reports.

The reports do not show who owns Dome and the company's Web site is registered anonymously via a Web-hosting company in Pennsylvania under the first name, "oneanddone."

According to the reports, Dome was paid $23,500 in planning fees. The company is listed as having an Arlington, Va. address. The address is home to a UPS Store. A clerk at the store said Dome rents a mail box there but state and federal law prevented him from releasing information on who the mail box was rented to.

A clerk with the state of Virginia's Corporations Commission said Dome did not appear to hold any official papers of incorporation and was not registered as doing business in Virginia.

A check with the City of Arlington also showed the company had no business licenses with the city, but a clerk also said if it was operating out of mailbox it would not be required to. The same clerk said if the company was collecting money in Virginia, however, it should be registered with the state for state tax purposes.

The company's Web site has only an email address for contact information and a message sent to it was not returned.

Mendros said Friday Dome was hired by the PAC and was based in Arlington, Va. and has been involved in polling and buying advertising time. Mendros said he mostly deals with the company online.

Other reports filed by the PAC in 2011 show that it has been funded largely by private donors and that the bulk of its expenditures were paid to Olympic Consulting, a company owned and operated by Mendros. In 2011 the PAC paid Olympic $25,000 for its services including an $8,000 bonus for the 2010 signature gathering campaign that put the Lewiston casino question on the ballot this fall.

Lewiston Mayor Larry Gilbert, a spokesman for the PAC, said he was aware GTSource Corp. was going to be donating money and that company representatives had visited Lewiston and toured Bates Mill No. 5.

Gilbert said they toured the building with City Manager Ed Barrett and other city staff liked what they saw but he did not meet personally with Graham or other GTSource executives.

Gilbert reiterated his support of the casino downtown saying for him it was all about bring jobs to Lewiston-Auburn, the region and representing the 66 percent of Lewiston voters who supported the idea to bring a casino to Bates Mill No. 5 in a citywide vote in 2010.

sthistle@sunjournal.com

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OPTION AGREEMENT

THIS OPTION AGREEMENT (this "Agreement"), is made and entered into as of this ___ day of September, 2011, by and between **GREAT FALLS RECREATION & DEVELOPMENT, LLC**, a Maine limited liability company with an address at 135 Hogan Road, Lewiston, Maine ("Great Falls") and **M FIVE, INC.**, a Maine corporation with a principal address at 10315 Thornbush Lane, Bethesda, Maryland ("M5").

EXPLANATORY STATEMENT

A. On June 21, 2010, Great Falls and the City of Lewiston, Maine (the "City") entered into an Option Agreement (the "Mill 5 Option;" all capitalized terms not otherwise defined herein shall have the meanings assigned to them in the Mill 5 Option) pursuant to which Great Falls obtained the right to purchase certain real property (the "Option Property") described therein for the purpose of redeveloping the Option Property as a casino and related amenities (the "Project").

B. On August 1, 2011, Great Falls and M5 entered into the Mill 5 Option – Memorandum of Understanding pursuant to which Great Falls and M5 agreed to enter into this Agreement.

NOW, THEREFORE, in consideration of the foregoing and of other good and valuable consideration, the parties hereby agree as follows:

1. Option to Acquire the Mill 5 Option.

1.1. In consideration of the option payments described in Section 1.2 below (the "Option Payments") and other agreements of M5 set forth herein, Great Falls hereby grants to M5 the option (the "M5 Option"), at any time during the eighteen (18) month period following the date hereof (the "Option Period"), to acquire the Mill 5 Option. The M5 Option shall be exercisable by M5's sending written notice thereof to Great Falls and by M5's timely making all Option Payments due hereunder, including the final payment described in Section 1.2.5 and compliance with the other terms and conditions of this Agreement. If M5 exercises the M5 Option, closing shall occur not later than ten (10) business days after the date of M5's notice.

1.2. As consideration for Great Falls' grant of the M5 Option and subject to Great Falls' use of the Option Payments set forth in this Section 1.2, M5 shall make the following Option Payments to Great Falls:

1.2.1. Forty Thousand Dollars ($40,000.00), payable upon execution of this Agreement, Thirty Thousand Dollars ($30,000.00) of which shall be used to reimburse Great Falls for the payment made to the City on July 31, 2011 under the Mill 5 Option;

1.2.2. Fifty Five Thousand Dollars ($55,000.00), payable the execution of this Agreement;

1.2.3. Fifty Five Thousand Dollars ($55,000.00), payable on October 7, 2011;

1.2.4. One Hundred Thousand Dollars ($100,000.00), payable on December 30, 2011, which sum shall be used by Great Falls to pay to the City the Fourth Option Payment under the Mill 5 Option if the Statewide Ballot Measure passes; and

1.2.5. Subject to Section 1.5 below, Three Hundred Fifty Thousand Dollars ($350,000.00) payable on the earlier to occur of (a) June 30, 2012, or (b) the date on which M5 applies for a casino license with the Maine Gambling Control Board (the "Board").

1.3. M5's failure to make any of the foregoing payments when due shall automatically result in the termination of the M5 Option. If Great Falls fails to make the disbursements to the City described in Sections 1.2.1 or 1.2.4, resulting in the termination by the City of the Mill 5 Option, Great Falls shall refund to M5 all Option Payments theretofore made by M5.

1.4. Section 13 of the Mill 5 Option permits Great Falls to assign the Mill 5 Option to a third party subject to the "City's written approval which may not be unreasonably withheld, conditioned or delayed." M5 shall seek said approval prior to the exercise of the M5 Option. If the City does not approve the transfer of the Mill 5 Option to M5 in the manner contemplated by this Agreement, M5 shall have the right to assign this Agreement pursuant to Section 9.2 hereof.

1.5. Upon M5's timely making all Option Payments due hereunder, and simultaneously with M5's making the payment required by Section 1.2.5, Great Falls shall assign the Mill 5 Option to Great Falls by delivering an executed Assignment in the form of **Exhibit A** hereto.

1.6. If the City does not approve the transfer of the Mill 5 Option to M5 in the manner contemplated by this Agreement, and if all commercially reasonable efforts to assign this Agreement pursuant to Sections 1.4 and 9.2 are unsuccessful (it being the parties' intention that, because of the political sensitivity of Project, the provisions of this Section 1.6 are a last resort to obtain for M5 the benefits of the Mill 5 Option), Great Falls and M5 agree that the transactions contemplated hereby may, at the option of M5, be effected by the transfer of all of the issued and outstanding equity interests in Great Falls to M5 (the "Equity Transfer") by the owners of the outstanding equity interests (the "Equity Owners," which term shall include any entity formed by the Equity Owners to receive Option Payments and Exercise Payments) in consideration of the Option Payments and Exercise Payments (defined in Section 2 below) paid pursuant to this Agreement. The Equity Transfer shall be carried out by the parties entering into an interests purchase agreement containing customary terms. The Equity Transfer shall be subject to the following terms and conditions:

1.6.1. Other than the change in form of transaction from assignment to Equity Transfer, and the payment of any Exercise Payments to the Equity Owners in proportion to their ownership of Great Falls (instead of to Great Falls), the Equity Transfer shall be subject to the same provisions as the M5 Option is subject to pursuant to this Agreement.

1.5.2. Prior to or concurrently with the consummation of the Equity Transfer, Great Falls shall dispose of all assets other than the Mill 5 Option, and shall satisfy, or make adequate provision therefor, all liabilities, including tax liabilities, other than future obligations under the Mill 5 Option. The Mill 5 Option, and all of the issued and outstanding equity interests of Great Falls, shall be free of liens, encumbrances and liabilities at the time of the Equity Transfer.

1.5.3. Great Falls shall indemnify and hold harmless M5 and its successors and assigns from and against any and all liabilities arising prior to the Equity Transfer associated with Great Falls, including tax liabilities, other than future obligations under the Mill 5 Option.

1.5.4. M5 shall indemnify and hold harmless the Equity Owners, their successors and assigns, from and against any and all liabilities arising after to the Equity Transfer associated with Great Falls, including tax liabilities and future obligations under the Mill 5 Option.

2. Option Exercise Payments.

2.1. As additional consideration for the assignment of the Mill 5 Option, as well as the rights due to the holder of the Mill 5 Option, M5 shall make the following payments (the "Exercise Payments") to Great Falls or to the Equity Owners in the event of an Equity Transfer:

2.1.1. Five Million Dollars ($5,000,000.00), payable in eight (8) quarterly installments of Six Hundred Twenty Five Thousand Dollars ($625,000.00), beginning three (3) months after a casino ("Casino") opens to the public for gaming (the "Opening Date") in Lewiston, Maine, as a result of rights granted in the Mill 5 Option (the "Opening Payments"). Great Falls shall have the right to declare all Opening Payments due and payable at once in the event of that M5's failure to make an Opening Payment when due, which failure is not cured within the cure period set forth in Section 6.4 hereof.

2.1.2. Beginning on the 15th day of the first month following the first full calendar quarter in which the Casino has been open to the public for gaming, and on every April 15, July 15, October 15 and January 15 thereafter, until forty (40) payments have been made, a payment equal to the "Applicable Percentage" of "After Cascade Net Revenue" (as defined in Section 2.2 below) (each such payment a "Participation Payment").

2.2. For the purposes hereof, the following terms are defined as follows:

2.2.1. For the first thirty-six (36) Participation Payments, the "Applicable Percentage" shall be Five Percent (5%); for the last four (4) Participation Payments, the "Applicable Percentage" shall be Ten Percent (10%).

2.2.2. "After Cascade Net Revenue" means the following amount, calculated for the immediately preceding quarter:

A – B – C

Where:
A is money played in slot machines and table games at the Casino;

B is all prizes paid out through slot machines and table games at the Casino; and

C is all applicable taxes paid to the Board. "Applicable taxes paid to the Board" does not include any state or federal inheritance, estate, intangible, stock, special, succession, transfer, sales, gift, franchise, corporation, income or profit tax or capital levy.

2.2.3 Interest shall accrue on Exercise Payments not made when due at the State of Maine rate of post-judgment interest and shall be payable on demand.

2.3. Notwithstanding any provision in this Agreement to the contrary, in the event that the Maine Gambling Control Board indicates that it has substantive objections to the amount, form or manner of payments described in Sections 2.1.1 and 2.1.2, Great Falls and M5 shall exercise good faith efforts to develop an alternative means to provide each party with the intended commercial and economic benefits of this Agreement.

3. Closing Under M5 Option.

3.1. At the closing of the acquisition of the Mill 5 Option, Great Falls shall deliver to M5 (a) an Assignment in the form of **Exhibit A** hereto, as contemplated by Section 1.5 above, and (b) such other documents and instruments as M5 may reasonably request in order to enable M5 to obtain good title and full rights to the Mill 5 Option. As security for M5's obligations after closing, M5 shall deliver to Great Falls (a) a first lien position collateral assignment of the Mill 5 Option and (b) a first lien security interest in all assets of M5. The collateral assignment of the Mill 5 Option shall provide that upon the exercise of the Mill 5 Option by M5 with the City, M5 shall grant Great Falls (x) a mortgage and security agreement on the Option Property, and (y) a security interest in all assets of M5, each subordinated to any Senior Lender(s) (defined below), provided, however, that such Senior Lender agrees to give Great Falls notice of any

default of M5 under the terms of M5's indebtedness to the Senior Lender. In the event that Great Falls cures any default of M5 with such Senior Lender, interest on any funds advanced shall accrue thereon at the State of Maine rate of post-judgment interest and shall be payable on demand. In addition, M5 shall exercise commercially reasonable efforts to negotiate a provision in its written agreements with Senior Lender which shall grant Great Falls the first option to purchase the debt between M5 and the Senior Lender in the event of the default of M5 thereunder. So long as Great Falls has a mortgage and security agreement on the Option Property, M5 shall grant no lender a mortgage or security interest in the Option Property other than for a debt the sole purposes of acquiring, developing or constructing the Project, or permanent financing or refinancing thereof. The Option Property shall not be cross-collateralized with any other debt of M5.

3.2. For the purposes hereof, "Senior Lender" shall mean any commercial lender to whom M5 owes any kind of debt for the sole purposes of acquiring, developing or constructing the Project, or permanent financing or refinancing thereof. In any refinancing, so long as Great Falls has not been paid in full, M5 shall not be permitted to increase the loan to value of the Option Property as collateral. Great Falls agrees to execute one or more subordination agreements in customary form evidencing the subordination of its position to a Senior Lender. Notwithstanding the foregoing, any such subordination agreement shall permit regularly-scheduled Opening Payments to Great Falls so long as no event of default has occurred and is continuing under the terms of M5's loan agreements with the Senior Lender.

4. Non-Disclosure.

4.1. As used in this Article 4, the term "Confidential Information" includes any and all of the following information of Great Falls and M5 that has been or may hereafter be disclosed in any form by either party or its representatives (collectively, a "Disclosing Party") to the other party or its representatives (collectively, a "Receiving Party"):

4.1.1. All information that is a trade secret under applicable trade secret or other law;

4.1.2. All information concerning the business and affairs of the Disclosing Party, and all information obtained from review of the Disclosing Party's documents or property or discussions with the Disclosing Party regardless of the form of the communication; and

4.1.3. All information respecting the Mill 5 Option (and the Project to which it relates) or this Agreement.

4.2. Each Receiving Party acknowledges the confidential and proprietary nature of the Confidential Information of the Disclosing Party and agrees that such Confidential Information (a) shall be kept confidential by the Receiving Party; (b) shall not be used for any reason or purpose other than to evaluate and consummate the

transactions contemplated by this Agreement; and (c) without limiting the foregoing, shall not be disclosed by the Receiving Party to any person, except in each case as otherwise expressly permitted by the terms of this Agreement or with the prior written consent of the Disclosing Party. Each Receiving Party shall disclose the Confidential Information of the other party only to its representatives who require such material for the purpose of evaluating and/or effectuating the transactions contemplated by this Agreement.

4.3. Sections 4.1 and 4.2 do not apply to that part of the Confidential Information of a Disclosing Party that a Receiving Party demonstrates (a) was, is or becomes generally available to the public other than as a result of a breach of this Article 4 by the Receiving Party or its representatives; (b) was or is developed by the Receiving Party independently of and without reference to any Confidential Information of the Disclosing Party; (c) was, is or becomes available to the Receiving Party on a nonconfidential basis from a third party not bound by a confidentiality agreement or any legal, fiduciary or other obligation restricting disclosure; or (d) must reasonably be provided to the Board after passage of the 2011 Statewide Ballot Measure in order to effectuate the consummation of the options contained herein and the exercise of the Mill 5 Option.

5. Dispute Resolution.

5.1 The parties hereto hereby irrevocably submit to the exclusive jurisdiction of any federal or state court having original jurisdiction over matters arising in Cumberland County, Maine over any dispute arising out of or relating to this Agreement (excluding the foreclosure of any mortgage or security interest) or any of the transactions contemplated hereby and each party hereby irrevocably agrees that all claims in respect of such dispute or any suit, action or proceeding related thereto shall be heard and determined in such courts.

5.2 Should any proceeding be commenced between the parties to this Agreement seeking to enforce any of its provisions, the prevailing party in such proceeding shall be entitled, in addition to such other relief as may be granted, to a reasonable sum for court costs and attorneys' fees and all legal expenses and fees incurred in such proceeding on appeal and all interest thereon. For the purposes of this provision, "prevailing party" shall include a party which dismisses an action for recovery hereunder in exchange for payment of the sum allegedly due, performance of covenants allegedly breached, or consideration substantially equal to the relief sought in the action or proceeding.

6. Termination. In addition to the automatic termination of this Agreement as set forth elsewhere in this Agreement, this Agreement may be terminated as provided below.

6.1 In the event that the 2011 Statewide Ballot Measure fails to pass, this Agreement shall automatically terminate, Great Falls shall have the right to retain all

Option Payments received and the Mill 5 Option shall be the sole and exclusive property of Great Falls free of any interest of M5.

6.2 M5 may terminate this Agreement by giving written notice to Great Falls at any time prior to the closing in the event Great Falls has breached any material agreement contained in this Agreement in a material respect, M5 has notified Great Falls in writing of the breach and the breach has continued without cure or written waiver of the breach by M5 for a period of seven (7) days after the notice of breach. If M5 terminates this Agreement because of an uncured breach by Great Falls all rights and obligations of M5 under this Agreement will terminate and Great Falls shall reimburse M5 for any Option Payments made hereunder, together with campaign expenses described in Section 9.1 hereof.

6.3 Great Falls may terminate this Agreement by giving written notice to M5 at any time prior to the Closing in the event M5 has breached any material agreement contained in this Agreement in any material respect, or in the event of a default under Article 8 of this Agreement, Great Falls has notified M5 in writing of the breach and the breach has continued without cure or written waiver of the breach by Great Falls for a period of seven (7) days after the notice of breach. If Great Falls terminates this Agreement because of an uncured breach by M5 all rights and obligations of M5 under this Agreement will terminate and the Mill 5 Option shall be the sole and exclusive property of Great Falls free of any interest of M5.

6.4 In addition to the parties' rights to terminate this Agreement and to damages for breach of this Agreement, each party recognizes that in the event a party is in material uncured breach of this Agreement, no remedy of law will provide adequate relief to non-defaulting party, and therefore the parties agree that each party shall be entitled to injunctive relief to cure any such breach without the necessity of proving actual damages.

7. Noncompetition. The member(s), manager(s), employees, partners, joint venturers and agents of M5 and members of their respective families ("families" being defined as spouse and minor children) shall not directly or indirectly invest or take any ownership interest in any other future casino and/or gaming project, casino and/or gaming ballot initiative in the State of Maine until such time as the Mill 5 Option is terminated, expires or is exercised and a Casino has been constructed on the Option Property or in the event that the 2011 Statewide Ballot Measure fails. Notwithstanding the foregoing, M5 shall not be deemed in breach of this Section 7 if any of its member(s), manager(s), employees, partners, joint venturers or agents, or members of their respective families participate with Maine Indian tribes in the expansion of their high stakes bingo operations.

8. Default. Upon the occurrence of any one or more of the following events, M5 shall be in default hereunder: (a) the insolvency of the M5; or (b) the making of any assignment for the benefit of creditors of M5; or (c) the issuance of filing of any attachment, levy, or other judicial process on or against any of the M5's assets which is

not dismissed within thirty (30) days; or (d) the appointment of a receiver, trustee or custodian for all or any portion of the property of the M5 which is not dismissed within thirty (30) days; or (e) the commencement of any proceedings under any state or federal bankruptcy or insolvency law or under laws for relief of debtors, by or against the M5 which is not dismissed within sixty (60) days after the commencement thereof; or (f) the dissolution, business failure (which term includes, without limitation, the cessation of normal business operations) or termination of existence of the M5; (g) the failure of the M5 to pay its debts as they mature (subject to applicable grace periods); (h) any default in the payment by M5 of any sums due under this Agreement when due, or default by M5 in performance of any other obligation under this Agreement, subject to applicable grace periods; (i) default in the payment, satisfaction or performance by the M5 of any condition or obligation under any of the security documents described in Article 3 of this Agreement; or (j) M5's failure to comply with all of Great Falls' obligations to the City under the Mill 5 Option following the assignment thereof.

9. Further Covenants.

9.1. M5 shall develop, plan, manage and pay for any campaign efforts to cause the passage of the 2011 Statewide Ballot Measure. M5 shall sign a consultant's contract with Dome Messaging of Arlington, Virginia in connection with said campaign no later than September 30, 2011 (the "Campaign"). In addition, M5 shall contribute at least $100,000.00 to Green Jobs for Maine no later than October 5, 2011 for the Campaign, to be disbursed in the manner recommended by Dome Messaging. Notwithstanding the foregoing, if Dome Messaging recommends that M5 contribute $100,000.00 to one or more recipients other than Green Jobs for Maine, M5 shall not be deemed in breach of this Section 9.1 if it contributes $100,000.00 to such other recipient(s).

9.2. M5 may not assign any of its rights and delegate any of its obligations under this Agreement or under the Mill 5 Option to any person without the prior written consent of Great Falls (which shall be granted upon the vote of those members of Great Falls holding a majority of outstanding interests), or a majority of the Equity Owners, as the case may be, which consent will not be unreasonably withheld, conditioned or delayed. Notwithstanding the foregoing, M5 may assign its rights under this Agreement and under the Mill 5 Option to an Affiliate (defined below) of M5, provided that any such assignment shall not relieve M5 of its obligations hereunder. Any attempted assignment in contravention of this Section 9.2 shall be void from inception. Subject to the preceding sentence, this Agreement will apply to, be binding in all respects upon and inure to the benefit of the successors and permitted assigns of the parties. For the purposes hereof, "Affiliate" shall mean, with respect to M5, persons or entities controlling, controlled by or under common control with M5. Any assignee, whether one by prior written consent by Great Falls or an Affiliate, shall assume in a writing approved by Great Falls all obligations of M5 hereunder.

9.3. Great Falls agrees (at its own cost) to perform (or procure the performance of) any and all acts and things, and execute and deliver (or procure the execution and delivery of) such further documents, as may be required to (a) maintain the

validity of the Mill 5 Option, (b) to implement and/or give effect to this Agreement and the transactions contemplated by this Agreement, (c) upon exercise of the M5 Option, to vest in M5 the Mill 5 Option and the full benefit of the rights associated therewith, and (d) to obtain from the Board any licenses necessary that Great Falls is required to obtain in order for M5 to develop the Project and build and operate the Casino.

9.4 M5 agrees to undertake commercially reasonable efforts to become licensed to operate the Casino by the Board and to open the Casino no later than December 1, 2013 (the "Target Date"). Regardless of whether the Casino is open by the Target Date, M5 shall begin to make payments in the amount of $50,000.00 per month beginning on the Target Date, and on the like day of each month thereafter until the Casino is open. The monthly payments of $50,000.00 shall be applied without interest to the Opening Payments. Great Falls shall have the right to declare all Opening Payments due and payable at once in the event of that M5's failure to make a $50,000.00 payment when due, which failure is not cured within the cure period set forth in Section 6.4 hereof. Interest shall accrue on the $50,000.00 not made when due at the State of Maine rate of post-judgment interest and shall be payable on demand. In the event that the Board denies M5 the license to operate the Casino, M5 shall have the right to assign this Agreement pursuant to Section 9.2. Notwithstanding the foregoing, if M5's efforts to obtain a casino license, or the opening of the Casino, are delayed beyond the Target Date due to injunction, strike, litigation, force majeure, challenges to the referendum, or any other event beyond M5's control, M5 shall provide prompt notice of such event to Great Falls and the Target Date shall be deferred by a period of time equivalent to the delay caused by such event.

10. Miscellaneous.

10.1. Each of the parties represents to the others that it has the right and lawful authority to enter into and be bound by this Agreement and, except for consents required from the City, the passage of the 2011 Statewide Ballot Measure, and any permits required by the Board, no consent or approval of any person is or will be necessary to ensure the validity of the rights created hereunder.

10.2. Great Falls' right, title and interest in and to the Mill 5 Option is and shall be free and clear of all liens, encumbrances or rights in others.

10.3. All notices, communications and deliveries hereunder shall be made in writing signed by the party making the same, and shall be delivered personally, or by telecopy transmission or sent by registered or certified mail or by any courier service (with postage and other fees prepaid). Notices shall be deemed to have been given and received as follows: (i) if delivered personally or by any courier, on the date of delivery; (ii) if sent by registered or certified mail, on the fourth day after it was mailed; and (iii) if by telecopy transmission, the date of its transmission; provided that in each case if the date of the deemed delivery is not a business day, then such notice shall be deemed to have been given and received on the first business day next following the date of deemed receipt.

10.4. This Agreement shall be governed in all respects by the laws of the State of Maine. Time is of the essence in the performance of this Agreement.

10.5. This Agreement may be executed simultaneously in one or more counterparts, each of which shall be deemed an original, but all of which shall constitute but one and the same instrument.

[SIGNATURES ON FOLLOWING PAGE]

IN WITNESS WHEREOF, each Party has caused this Agreement to be executed as a deed by its duly authorized representative as of the date first written above.

GREAT FALLS RECREATION & DEVELOPMENT, LLC

By: _____
Stavros Mendros, Manager

M FIVE, INC.

By: _____
Its: _____
Print/type name: _____

[SIGNATURES CONTINUED ON FOLLOWING PAGE]

IN WITNESS WHEREOF, Assignor and Assignees have duly executed this Assignment, under seal, effective the ___ day of _____, 2012.

GREAT FALLS RECREATION AND DEVELOPMENT, LLC

By: _____
Its: _____
Print/type name: _____

By: _____
Its: _____
Print/type name: _____

By: _____
Its: _____
Print/type name: _____

M FIVE, INC.

By: _____
Its: _____
Print/type name: _____

1964819

Attachment #11

2/24

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

Minutes of the January 25, 2012, Meeting of the
Commission on Governmental Ethics and Election Practices
Held at the Commission Office, 45 Memorial Circle,
Augusta, Maine

Present: Walter F. McKee, Esq., Chair; André G. Duchette, Esq.; Margaret E. Matheson, Esq.; Hon. Jane A. Amero. Staff: Executive Director Jonathan Wayne; Phyllis Gardiner, Counsel.
Absent: Michael T. Healy, Esq.

At 9:05 a.m., Chair Walter McKee convened the meeting.

The Commission considered the following items:

Agenda Item #1. Ratification of Minutes of the November 30, 2011 Meeting

Ms. Matheson moved to accept the minutes as drafted. Mr. Duchette seconded.
Motion passed unanimously (4-0).

2. Request by Michael G. Hein to Investigate Christian Civic League of Maine

Michael G. Hein requested that the Commission investigate whether an e-mail communication by the Christian Civic League of Maine (CCLM) should have been disclosed in campaign finance reports for the Christian Civic League PAC or Rep. Raymond Wallace's candidate committee. Mr. Wayne explained that there is an exception in the statute for communications from membership organizations to their members which staff believes this falls under.

Michael G. Hein explained that he was not a current member of the Christian Civic League of Maine (CCLM) but was on the e-mail distribution list which goes out to thousands of people in addition to members. He said he was familiar with the organization's practices because he used to be an administrator. He said in the past the CCLM would always take care to make sure that its political action committee reports completely disclosed its activities. He said that complete disclosure regarding communications to support candidates are particularly important. He explained his view was this was an in-kind contribution which was not reported by CCLM.

Mr. Duchette asked why the staff would not want to give Ms. Strommer a reduced penalty.

Mr. Wayne said it would be fine to grant a reduction except in order to be consistent with a similar situation which has come before the Commission a reduction was not granted.

Mr. Duchette moved to find Ms. Strommer in violation but reduce the penalty to $50. Ms. Amero seconded.

Motion passed unanimously (4-0).

5. Request by Casinos*NO!* to Investigate Green Jobs for ME and People of Lewiston/Auburn Committee
Casinos*NO!* has filed a request that the Commission investigate the 2011 campaign finance reporting by the two political action committees that promoted the 2011 Lewiston casino citizen initiative. Mr. Wayne explained that there were two political action committees (PACs) formed to promote the casino effort in Lewiston. Green Jobs for ME (Green Jobs) which was active during the petition drive during 2010 and headed up by Stavros Mendros and the campaign finance reporting was handled by Peter Robinson. In 2011, the Legislature turned down the citizen initiative and it went to a referendum in November. A new PAC was formed three weeks before the election called People of Lewiston & Auburn Committee (PLAC). It was formed by many of the same individuals involved in Green Jobs. He said the Casinos*NO!* group came into possession of a proposed option agreement between the local casino advocates and an organization called M Five, Inc. (M5). He explained that the agreement proposed M5 would make financial contributions to fund this political campaign effort but when Casinos*NO!* looked at the reporting of the local PACs there was only one large outside contributor called GT Source Corp. Mr. Bailey, the director of Casinos*NO!*, has inquired as to whom the real contributor is, GT Source or M5. Mr. Bailey also raises some question about one of the vendors listed in the PACs' report, Dome Messaging, because there appears to be very little information about this vendor and Mr. Bailey questions whether Dome Messaging is a real entity or is a made-up name to mask the true identity of the vendor.

Mr. Wayne said that Mr. Bailey is asking the Commission to conduct an investigation of the PACs. In order to take that step, the Commission must determine whether Mr. Bailey has provided sufficient evidence for the Commission to believe that a violation may have occurred. Mr. Wayne said that the staff

has conducted some preliminary fact-finding in order for the Commission to have more information about the PACs and Dome Messaging to consider in reaching its decision.

Mr. McKee said there was a minimal standard, similar to probable cause, and Mr. Wayne confirmed that.

Dennis Bailey, a principal officer of Casinos*NO!*, said that this matter focused on a proposed agreement with M Five, Inc. He said the PAC made comments during the campaign that a third party would be brought in to operate the casino once the initiative passed. He said this agreement makes it appear that there already was a partner. He said this information was not provided to the public and it should have been. He said the PAC denied having any agreement but the agreement clearly states that M5 would fund the campaign. He said M5 does not appear on the campaign finance reports for this PAC. He said a group called GT Source, a Georgia casino company, is listed as a contributor and GT Source's president is an officer of M5. Mr. Bailey said the PAC admitted recently that M5 did provide funding to the PAC but this was not known during the campaign. He said the purpose of campaign finance reporting is to provide full disclosure to the public about who is funding the campaign. Mr. Bailey said he believed this information was kept out of the public's view deliberately for a reason which he did not know.

Mr. Bailey said he did receive an e-mail from a former employee of GT Source who was let go from his job back in August, as were others, because the company was not able to make payroll or pay its vendors. He said the employee wondered how GT Source could contribute $400,000 to support a campaign for a casino in Maine, if it could not make payroll.

Mr. Bailey also said there was another provision in the agreement that stated that M5 would hire a company called Dome Messaging to run the campaign. The only contact information for Dome Messaging on its website is an e-mail address with no other information provided. Mr. Bailey said the PAC was trying to convince us that the only way it contacted Dome Messaging, which was spending hundreds of thousands of dollars, was through this e-mail address. He did not find that believable at all. The PAC knows who is behind Dome Messaging but for some reason, that person wants to be anonymous. He said the lack of information and anonymity is concerning. He said if campaigns are allowed to have "front groups" providing the funding and other "front groups" managing the campaign it would not be consistent with the purpose of campaign finance laws. He said the purpose of campaign laws is to keep the public informed

and in this case the public was denied the complete information. Mr. Bailey urged the Commission to investigate further and get full disclosure about the spending on this campaign.

Mark Walker, Esq., said he represented the People of Lewiston and Auburn Committee (PLAC) and Peter Robinson, who was the treasurer for Green Jobs and who did the reporting for both PACs. He said if most of the complaint is based on the proposed agreement, it should be understood that the agreement was never executed. He did not understand how Mr. Bailey obtained a copy of an unsigned agreement and wondered whether that issue should be investigated. He said the proposed agreement had been signed by several members of the developer, Great Falls Recreation & Development, LLC, which had an option agreement with the City of Lewiston to develop mill number 5. However, that agreement was never signed by the other side. There were discussions about the agreement and the other parties to the agreement changed but no agreement was ever signed because they were trying to run a campaign and they were running out of time. He said the charge that the people involved with the campaign denied that there was an agreement lacks basis because there was never any executed agreement. He explained that GT Source was the original funding and this was reported. Mr. Walker said Mr. Robinson contacted the Commission staff on several occasions to find out how to report correctly.

Mr. Robinson explained that his discussions with Commission staff went back to 2010 when he called to find out how to report contributions from Great Falls Recreation & Development, LLC. He said he was told not to list the LLC as the contributor but list the actual people who paid capital into the LLC which was then used to make the contributions.

Mr. Walker said M5 was created in October of 2011 for the sole purpose of developing the casino if the initiative passed. It did not have assets to speak of. He said M5 was not the hidden source of funding. GT Source was the original source of the funds for the contributions. On one occasion, the funds flowed through M5 to the PACs. He said Mr. Robinson reported the contributions correctly according to the law.

Mr. Walker said that Stavros Mendros was the campaign manager for the campaign and had been given that responsibility by both PACs. He was responsible for fundraising for the campaign and making decisions about campaign spending. Dome Messaging was recommended to him as an expert in the field of media buys. He said federal law requires that a contact person be on file at the media outlets and so the

contact for Dome Messaging can be obtained from those media outlets. He said Stavros Mendros managed the campaign and directed Dome Messaging to do the work. He said Mr. Robinson was told to communicate via e-mail with Dome Messaging which is what he did.

Mr. McKee said that the staff recommended that they follow up on making contact with Dome Messaging for the purpose of seeing whether there is basis for believing that a violation may have occurred. He asked Mr. Walker whether he was suggesting that the staff not pursue that line of inquiry.

Mr. Walker said he understood why the Commission, its staff and others would like to know that piece of information; however, he questioned whether it was an obligation to find out that information. He said Mr. Robinson was able to communicate with Dome Messaging without knowing a specific individual.

Mr. McKee said the request is just for staff to get contact information for Dome Messaging from Mr. Mendros. It seemed like a reasonable and limited request to clear up questions about expenditures made by Dome Messaging. It may turn out that there are no issues but, at this point, there is practically no information about this vendor and contact with it may put to rest some of these questions.

Mr. Robinson said Mr. Mendros was the person involved with bringing Dome Messaging onboard and Mr. Mendros knows the individuals involved. He said his involvement was just through e-mail communication. He said Dome Messaging was very forthcoming about providing expenditure statements and they were very familiar with the reporting requirements. He said all the expenditures were consistent with what was being delivered. The information on file with the media outlets will corroborate the expenditures listed in the campaign finance reports.

Mr. Walker said the campaign finance reports show expenditures made by Dome Messaging at the request of the campaign manager and as reported by the campaign treasurer. But for a question raised by an opponent of the referendum, would the Commission question the content of the PACs' campaign finance reports? He said that he believes the answer would be no. The PACs reported the expenditures completely and accurately and timely and they have met the reporting requirements of the law.

Ms. Amero said the reporting may be compliant but there is a question as to whom this vendor is. There must be more information than just an e-mail address. She said that it does not pass the straight-face test when a company that runs media and marketing campaigns, possibly across the country, does not identify any of the people in the company. She said they were paid nearly $400,000 but there is no information about who they are. She said she found it quite curious that there is so little information available about the company and the people involved in it.

In response to a request from Mr. Duchette for clarification, Mr. Walker said that the original source for the funds was GT Source, even though some of the funds did flow through M5. Any funds that flowed through M5 came from GT Source.

Mr. Robinson said that Mr. Bailey would have the Commission believe that the PACs are changing their story about the source of the contributions because they have been "caught" doing something wrong. It is clear that is Mr. Bailey's intent when he said that even though GT Source was originally reported as the contributor, it turns out that the money came from M5. But it is simply not true. He explained that M5 was developed for the purpose of developing the casino. It had nothing to do with the campaign. The campaign was funded by GT Source. If the referendum had passed, M5 would have applied for the license to operate the casino. He said if he listed M5 as the contributor in the campaign finance report for Green Jobs, he would have been crucified. The bank statement for Green Jobs showed that the funds came from M5. But M5 was an LLC recently formed in the state of Maine just before the election. The same people criticizing him now for listing GT Source as the contributor instead of M5 would have criticized him back then for listing a shell company that no one had heard of before and trying to pass it off as a Maine company instead of the actual source of the funds. He said he would have been fined for that because the staff told him not to report the contributions that way. He was told to list the individual partners of Great Falls Recreation & Development, LLC as the contributors, not the LLC.

Mr. McKee asked why the money came through M5 instead directly from GT Source. Mr. Robinson said he was not sure.

Mr. Robinson explained that had M5 been reported as the contributor at the time, it would not have reflected the reality of what was going on. A deal had not been worked out between M5 and Great Fall

Recreation & Development. He said if he had listed M5 on the PAC report, it still would have created questions because the source of the money was GT Source.

Mr. McKee said following up with the investigation will just put all the questions to bed once and for all, understanding that Mr. Robinson would like to just have it done and over with.

Mr. Robinson said that he takes exception to Mr. Bailey's portrayal that the PACs got "caught" and have changed their story because it is absolutely not the case. Mr. Robinson said he wrote a six page response to this inquiry explaining who M5 was and other details in order to clarify the situation. There is nothing to correct because the report was accurate in stating that the funding came from GT Source. The fact that it flowed through GT Source was almost irrelevant. The people of Maine wanted to know where the money really came from and it came from GT Source. He reported that the money came from out of state, from a Georgia company, not an LLC recently formed in Maine. He said he stands by his explanation and reporting. He said Mr. Bailey's implication that his PAC got caught at something and is changing its story is not true.

Mr. Duchette said the Commission has to look into what is brought before them and this matter could have been brought to rest awhile ago if GT Source had been willing to speak to the Commission staff and answer a few questions. He said because GT Source would not cooperate with the staff, the matter has become more questionable and puts the Commission in the position of having to investigate further.

Mr. Robinson stated he did not think it was right that people can come before the Commission and spin a story and make it look like a cover-up of some sort. He said this was not fair. He said Mr. Bailey is trying to make people believe that his organization is trying to hide the fact that there was out-of-state funding and partnering and that is not true. He said he reported everything up front and resents the implication that something was being hidden.

In response to a question from Mr. Duchette, Mr. Walker said the first compliance issue that is being questioned is what was the original source of funding for the pro-casino PACs. The true source was GT Source and it was reported as GT Source. He said he did not know why GT Source refused to provide any further information to the Commission staff. He said the bottom line is that the original source of funding

was reported correctly. He said the second compliance issue is whether Dome Messaging was the payee for all expenditures. The answer is yes. The documentation has been provided to show that Dome Messaging was paid for expenditures. He said Dome Messaging is simply a company that performs media work and makes media buys; the company did the work and was paid for the work. He said the campaign finance reports are complete and there is back-up material to substantiate the expenditures listed in the report.

Mr. McKee said the focus today needs to be whether there appears to be evidence that there may have been a violation and asked Mr. Wayne if today's testimony changed the staff's outlook for the need of further investigation.

Mr. Wayne explained that it was not clear that the Commission absolutely had to look further into this issue. On one hand, Mr. Robinson was adamant that GT Source was in fact the source of the funding and no other source contributed. On the other hand, Dwayne Graham, owner of GT Source, has not cooperated with the Commission's request for information. Mr. Wayne said the company does not have a website any longer, although there may be a reasonable explanation for that. Mr. Bailey produces an e-mail which appears to be from a former employee of GT Source who stated that the company could not make payroll or pay its vendors. That gives rise to a question about GT Source's financial capacity prior to the contributions being made.

Mr. McKee asked Mr. Wayne whether he thought that, given all that Mr. Robinson and Mr. Walker have said, there was other information that he thought was necessary to answer the remaining questions in this matter.

Mr. Wayne said he thinks that additional steps could be taken to verify that the PACs receive funding from GT Source in the manner Mr. Robinson described. He said also there could be more fact-finding into the expenditures by Dome Messaging and talking with Mr. Mendros would be beneficial in that regard. While Dome Messaging may have business reasons for providing minimal information, the Commission has a duty to make sure the information on the campaign finance reports is correct.

Mr. McKee said the reasons stated show sufficient grounds that a violation may have occurred but no decision should be made until more investigation has been concluded. He said the Commission would be remiss if follow up was not done because there are too many remaining questions.

Mr. Wayne said the campaign finance reports for PLAC show that it received funds from GT Source and made payments directly to vendors with those funds. However, according to Mr. Robinson, even though the reports show money coming into and going out of the PAC, what really happened was GT Source paid Dome Messaging directly. Mr. Wayne said technically that could be a violation.

Mr. Duchette said this matter could have been handled much more efficiently and effectively if the staff's questions were answered completely with supporting documents, like bank account statements and invoices. The fact that GT Source is not cooperating makes resolving these questions that much more difficult. He did not see how the Commission could make a determination to not investigate without having that information.

Ms. Amero moved that the Commission conduct an investigation because the request shows sufficient grounds for believing that a violation may have occurred. Mr. Duchette seconded.

Motion passed unanimously (4-0).

Mr. Wayne explained that there may be different investigative steps that may need to be taken from this point; therefore communication with the Chair may be necessary before the next scheduled meeting.

6. Rulemaking

The Commission will consider whether to initiate a rulemaking for amendments to the Commission Rules proposed by the Commission staff. Mr. Wayne explained that the first step in the process was to initiate a rulemaking and set up at time and date to hear public comment either written or orally. He suggested having the public hearing for oral comments at the next meeting on Wednesday, February 29. After the March 28 meeting, the changes would go to the Legislature for adoption. Mr. Wayne pointed out that one of the changes is eliminating the matching fund portion of the Clean Election Act.

Green Jobs for ME
P.O. Box 641
Lewiston, ME 04243
January 11, 2012

Mr. Jonathan Wayne
Executive Director
Commission on Governmental Ethics and Election Practices
135 State House station
Augusta, ME 04333

Dear Director Wayne,

I am writing in response to your recent request pertinent to a complaint filed by Dennis Bailey, and I am responding on behalf of both the "Green Jobs for ME" PAC and the "People of Lewiston and Auburn Committee" PAC.

At the outset, I should point out that I have heard varying descriptions of the document that Mr. Bailey claims to have, and that, at the very least, leads me to wonder whether there may be more than one version out there. Consequently, I can not say whether what Mr. Bailey has is a work of fiction with forged signatures, or a real document stolen from our attorney's offices (no member of our LLC has signed copies of documents), or a combination of both. Regardless of the exact nature of the document he claims to have, it doesn't look good for him that he has it.

Let me now turn to the various issues raised by Mr. Bailey.

Mr. Bailey's first question, at the bottom of page one, concerns "M5." To begin with, he got the name wrong. It's "M-Five," not "M5." Second, "M-Five" is an LLC that is organized in Maine, whereas Mr. Bailey's statement creates the impression that it is organized in Maryland. Not true. Third, we never finalized a contract with M-Five, and, notwithstanding the numerous versions that were drafted, some by them and some by us, I know of no version that was ever signed by anyone on their end.

M-Five was created because, looking forward past election day, had our initiative passed, the law requires that the applicant for a slot machine facility license be a Maine entity. M-Five would have been that entity. Thus, for purposes of developing the project, what we had been in the process of negotiating for many weeks was an agreement between us ("Great Falls Recreation & Redevelopment," which I will refer to as "Great Falls") and M-Five.

However, the funding for the campaign came from GT source. M-Five was a newly-formed entity, created for the purpose of actually developing the casino. M-Five was not some pre-existing, ongoing enterprise that had assets and could fund a campaign, nor is it a Maryland entity, which is what Mr. Bailey is suggesting. Even in his use of the word "outfit" he is conveying the impression that M-Five was an ongoing, pre-existing business. No, it was not. It was organized just a few weeks prior to the election, and as a Maine entity. I do not know whether this is an attempt by Mr. Bailey to mislead you about the true nature of M-Five. Regardless, it is rather easy to verify that M-Five is a recently-created Maine entity with no apparent assets.

I have had a good number of conversations with Cindy Sullivan over the past two years, and I have called her several times to get a question answered, or a point clarified. During one of the very first conversations I had with her, back when I first created the Green Jobs For ME PAC in 2010, Ms. Sullivan told me quite clearly that we are not supposed to list an LLC as the contributor to a PAC when the LLC is merely passing through monies contributed by the partners. Therefore, in my prior PAC reports, when the ultimate source of the contributions was the paid-in capital from the partners in Great Falls, I listed the partners' names as the contributors to the Green Jobs PAC, rather than listing Great Falls as the contributor. Ms. Sullivan made this abundantly clear, and it made perfect sense to me.

Under the circumstances, I would consider it wrong to list "M-Five" as a contributor for similar reasons. Had I listed a recently-created LLC as a contributor, then everyone would be screaming that I was deliberately trying to hide the real identity of the contributor, that I was trying to make it look like the contribution was coming from Maine when it was really coming from out of state and, most importantly, my position would have been indefensible, having been explicitly told by Ms. Sullivan that I was not supposed to do that. So, if that's Mr. Bailey's idea of campaign finance reporting, I think that speaks for itself.

Had I listened to Mr. Bailey, and I would be listing M-Five on campaign reports and getting fined for doing exactly the opposite of what I was told. No thanks.

Mr. Graham at GT Source was providing the funding for the campaign. That was made clear to me from the outset, and I verified it subsequently. Mr. Graham even said so publicly in a newspaper interview. Mr. Graham came to Lewiston and met with us, and with city officials. Back then, M-Five did not even exist.

Had the initiative passed, I believe Mr. Nash would have been the one to be the local presence for their group, since he already had business in Maine. As is often the case, each partner in a venture brings something different to the table. (Even in our own group, Great Falls, that was very much the case.)

Mr. Nash did come to Lewiston at the start of the campaign, but did not stay long. He had other business in Maine to attend to as well. I believe he wanted to see how things were going with the campaign. But, we also had initially intended to set up an outbound phone bank for the campaign, and Mr. Nash was going to help with that. However, plans changed and the phone bank never happened. When we rented office space from the Lewiston-Auburn Economic Growth Council, we leased a couple of cubicles on the fourth floor of their building for offices, and also a very large room on the third floor for the phone bank. I'm sure that Lucien Gosselin, the director of LAEGC, will confirm that. But, we never used the room on the third floor (and Mr. Gosselin can confirm that also, since the room was locked and only he had the key). The decision to scrap the phone bank was due to the decision to hire a large call center, instead, where hundreds of people would be making the calls for us, rather than just the 20 or so people that would have fit on the third floor. The call center expenditures appear in the PAC reports. The decision to increase live phone-calling was a result of discovering that TV ad rates had quadrupled over 2010. Since the phone bank never happened, there was nothing to report, other than the already-sunk cost to rent the third floor and the already-sunk cost of having Oxford Networks install an internet cable jack on the third floor, both of which were reported.

However, Mr. Nash evidently had started to program some phones for use in the phone bank prior to the decision to cancel the phone bank. He owned some "voice-over-IP" phones that connect to the internet rather than normal phone lines. When Sue Sharon, the reporter for MPBN, attempted to reach Mr. Nash, the phone number she dialed was evidently attached to one of his VOIP phones, and she heard the "People of Lewiston Auburn Committee" recording. But, I would point out that Ms. Sharon was trying to reach Mr. Nash, not the PAC. So, no, Mr. Nash was not answering the phones for the PAC, if that's what Mr. Bailey thinks. The People of Lewiston Auburn Committee had one phone number associated with it, which was publicized, and the phone number was connected to a cell phone which was purchased explicitly for that purpose, and was paid for by the PAC as part of a payment to Olympic Consulting. That company, as you are probably aware, is owned by Stavros Mendros. Mr. Mendros purchased the phone, and the phone was monitored, either by him or by another staff person, for inbound calls from the public.

Finally, Mr. Bailey raises questions about Dome Messaging, but I honestly have no idea what campaign finance laws he claims have been violated. Dome Messaging was recommended to us, by Mainers. Dome is a real company, and a legitimate business that does campaign consulting and media buying in various states. Like a number of such firms, it is located in the Washington, DC area. I believe I saw another, similar company listed by one of the casino opponents in their PAC reports, and their company also happened to be in Alexandria, VA. I'm not quite sure what the issue is.

Dome Messaging is not in any way affiliated with anyone associated with Great Falls, nor anyone associated with M-Five. In fact, it was precisely because Dome was considered an independent, third party, professional campaign consulting firm that Dome was brought on board, at the suggestion of Stavros Mendros, and everyone agreed.

Let us now look specifically at the questions that you have raised.

Q1-4) More time will be needed to gather this documentation. Both PACs have filed the source of their contributions, and expenditure information, in accordance with applicable statue, and have met their reporting requirements. The statute does not require any additional information. Regarding the confirmation request at the end of Request #4, I can confirm that both PACs do have records of the complete list of expenditures made by Dome Messaging.

Q5) I filed the Green Jobs PAC reports myself, and I filed the People of Lewiston and Auburn Committee PAC reports after reviewing the information with Bill Welch.

Q6) Stavros Mendros managed the Lewiston casino initiative from its inception, including both campaign and non-campaign activities.

Q7) Stavros Mendros made those arrangements with Dome Messaging.

Q8) Mr. Nash was neither hired nor paid by either PAC, nor by Great Falls. I addressed this question above in what I believe is far greater detail than is required by law.

Q9) GT Source made all contributions listed in Table A for each respective PAC, as reported by the respective PAC.

Q10) This question is predicated on the erroneous impression given to the Commission by Mr. Bailey that "M5" was a pre-existing, ongoing business with assets. But, such was not the case, as I have discussed above, and as can easily be verified. Based on my conversations with Ms. Sullivan, anyone in M-Five making a campaign contribution ought to have been listed individually in the PAC reports, and that is what I did.

Q11) Green Jobs for Maine PAC was the original PAC formed in order to comply with campaign finance reporting requirements related to the Lewiston casino initiative. Mr. Mendros and I formed the PAC in 2010. Great Falls Recreation & Redevelopment is a Maine LLC that was formed as a business entity for the purpose of developing a casino in Lewiston. Great Falls held an option to purchase land from the city of Lewiston for the purpose of developing a casino on that land. That option agreement was approved by the city council and by Lewiston voters on June 8, 2010, and it is a public document. Had Question 3 passed last fall, it is Great Falls that would have been entitled to apply for a slot machine facility license, as a result of holding that option agreement with the city of Lewiston. My partners and I in Great Falls made capital contributions to the LLC for the purpose of promoting the project. Some of Great Falls' expenditures were not campaign related, such as the cost of purchasing the option from the city. But, many of our expenses were campaign related, and that also included the cost of signature gathering in order to get on the ballot. All those expenditures were made through the Green Jobs PAC, but, rather than list Great Falls as the contributor, we listed the partners' names, as directed.

Q12) As I mentioned above, I am not aware of M-Five ever having signed anything. Therefore, even though I can not say for certain what it is that Mr. Bailey has, it can only be, at best, an unexecuted document – a "non-agreement," if you will.

Q13) No, there were no other agreements with anyone.

Finally, I think it is important to understand the unique arrangement made between Great Falls and the City of Lewiston. In the story Mr. Bailey included with his complaint, Mr. Bailey is quoted as saying that people are being "sold" that our project is "basically a local effort by local investors, by local residents and people in the community, and come to find out in this case it appears that it's already been sold, or at least they have an agreement to sell this to an outside source we know nothing about."

No, the truth is that we never said the developer would be local, nor would we ever dare, since that was not something that we could control. Going back to our first meeting with the Lewiston City Council in October, 2009, we made it clear that we had the funds to get this project to a certain point, and that we would then have to bring in someone else to take it the rest of the way. This was well-understood from day one, and it was not a secret. In fact, we talked explicitly about bringing a casino developer on-board, and there aren't any of those in Maine. We never claimed to be the developer, nor did we ever suggest in any way that we had that kind of money. We don't, and we never said we did. Mr. Bailey's comment is what he always says, but it does not apply to us, and he clearly did not do his homework with respect to our initiative. He even said, for example, that the Lewiston casino revenue cascade was a huge subsidy to harness racing. No, that could be said about the Bangor casino, or about the Biddeford proposal, which relied on the Bangor cascade, but our cascade was completely different, and Mr. Bailey obviously did not know that, either.

Every potential developer with whom we spoke and who was interested came to Lewiston and met not only with us, but with city officials, including either Ed Barrett (the City Administrator) or Lincoln Jeffers (head of economic development) or both. Mr. Jeffers took every potential developer on a tour of the property. So, there was never any dark secret about whom we were meeting with and the fact that some of them were from out of state.

In fact, we always gave Mr. Jeffers' contact information to potential developers who had specific questions about the property. That accomplished a number of things: it assured us that the developers were getting accurate information about the property, it let developers know that we had a good relationship with the city, and it gave the city a chance to speak with potential developers and vet them.

And that last point brings me to an aspect of this project that is unheard of in other casino initiatives. Our option agreement with the City of Lewiston gave the city the power to veto any sale or assignment of the option. So, in other words, no deal was ever going to be transacted without the city's prior approval. And I know, based on my conversations with Mr. Barrett, that the city would want to know that any assignee was capable of being licensed before the city would ever grant that approval.

So, we had an extra level of vetting built right into our option agreement, and, again, that agreement is a public document. It's not just that the city would have approval over the development, itself, through its "development review" process, and not just that the Gambling Control Board would vet the license applicant; there was also an additional right to pre-approve the owner/applicant, vested in the City of Lewiston, and no assignment could take place until the city first approved the assignee. From a public policy perspective, I submit to you that that was a good provision that protected the public interest, and it is something that did <u>not</u> happen in Bangor or Oxford. So, when Mr. Bailey went around saying that we had already "flipped" our interest, people in city hall already knew that we were in the middle of negotiations, but they also knew that we could not possibly have sold our option to another party because they knew that was impossible to do without the city's prior approval.

Again, no other proposal has had built-in pre-approval of the choice of developer by the municipality – only ours.

Quite frankly, Mr. Bailey must be thinking of Oxford. They were the ones who claimed that it was going to be an all-local effort, and who implied that Bob Bahre would be the developer. We now know that they brought in Och-Ziff Real Estate Advisers from New York, and then tried to stop the FOI request of the Gambling Control Board for a copy of the license application, which shows Och-Ziff's ownership interest.

But, as for us, just look at that Sun-Journal article that Mr. Bailey provided. The very first sentence makes it clear that our funding was from out of state. I would have loved to have been able to say it was all-local, but I knew two years ago that the chances of that were going to be extremely slim. So we never even suggested that. We had to take our lumps from anyone who had a problem with someone from out of state being involved.

Mr. Jeffers at city hall knows we tried to involve local developers, and he also knows that did not work out. So, I'm not about to apologize for bringing in someone from out of state, which seems to be at the heart of Mr. Bailey's complaint. Furthermore, from a purely economic point of view,

transacting business with someone from out of state is not a "bad" thing. It is simply not the case that an economic transaction that crosses state lines has a negative economic effect. That depends on how the transaction is priced. So, in my view, Mr. Bailey's concern about people from out of state is not based on sound economic principles; rather, it is an attempt to use xenophobia as a means of emotional manipulation.

I hope this letter has answered your questions.

You know, it's one thing to lose, and it's another thing to lose as badly as we did. There are a lot of very disappointed people here in Lewiston. And I desperately need to get back to a real job, having sacrificed two years of my life for this project. It was a tremendous disappointment for me, but there's no arguing about that lop-sided vote. I would very much like to move on with my life, and I think Mr. Bailey should move on with his as well.

Sincerely,

Peter D. Robinson

Jan

RECEIVED
JAN 23 2012
Maine Ethics Commission

January 23, 2012

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

RE: Response to January 13, 2012 letter regarding Lewiston Casino Referendum

Dear Mr. Wayne;

This letter responds to your two new requests, Questions 14 and 15, regarding reporting by the two PACs formed to pass Question 3, to allow a Casino in Lewiston. I am responding for Stavros Mendros, Manager, Green Jobs for ME and for Peter D. Robinson, Treasurer, Green Jobs for ME.

Question #14. Identify the individual at Dome Messaging who is most knowledgeable about the services it rendered to the PACs, along with that person's mailing address and phone number.

Both PACs and the campaign were managed by Stavros Mendros and he was the contact to Dome Messaging. He was told by Dome to use the following email address when sending and receiving information including invoices: Info@DomeMessaging.com

If the issue was whether Dome spent the money, or spent more money than was reported, please recognize that most of the funds were used to purchase media time, and federal law requires the contact information be provided by the media buyer. This information is public, and available through the various media outlets in Maine. Mr. Bailey knows this, and should not seek a State Agency to investigate information readily available to the public.

Question #15 To the best of your (both Mr. Mendros and Mr. Robinson) knowledge, did GT Source Corporation receive funds from any other source in order to make contributions to the PAC or to reimburse GT Source for the contributions it made to the PACs? If so, please identify those other sources and the amounts which GT Source received.

NO. It was Mr. Mendros' and Mr. Robinson's understanding that GT Source was the original source of funds for this campaign, and they are not aware of any other sources of funding. Per Mr. Robinson's answers to the prior questions, he contacted Cindy Sullivan at the Ethics Commission on multiple occasions and attempted to the best of his ability to file accurate, compliant reports.

There were no "mysterious" sources of additional funding for this Referendum. This was a campaign attempting to assist with economic development in downtown Lewiston, with the support of their City Council and local economic development organizations. GT Source was the only outside major contributor and was the original source of the vast majority of campaign funding. As your analysis indicated, the only other contributors were the funds from the original investors in Great Falls Development.

Mr. Mendros and Mr. Robinson are working on more complete responses to questions 1 – 4. They will provide documentation as requested by your Commission. Gathering this information is difficult and has been time consuming. I expect to hand deliver some if not all requested information by tomorrow morning, January 24th. Making this response more difficult was the unavailability of Mr. Mendros, the Campaign's manager who had some of this information, as he was out of the country for much of the time between Mr. Robinson's January 13th letter, and earlier this week.

Thank you for the opportunity to address the Complaint filed against the PACs by CasinosNo. We look forward to the January 25th Commissioners meeting.

Sincerely,

Mark L. Walker, Esq.
Law Office of Mark L. Walker
226 Water St.
Hallowell, Maine 04347

207-621-8188 (Office)

Mark@marklwalkeresq.com

www.marklwalkeresq.com

June 28, 2012

The Law Office of
Mark L. Walker Esq.

RECEIVED
JUL 5 2012
Maine Ethics Commission

Jonathan Wayne, Executive Director
Maine Ethics Commission
135 SHS
Augusta, Maine 04333

Re: Information Request to Lewiston and Auburn Committee and Green Jobs for ME

Dear Director Wayne,

As we discussed last week my clients Peter Robinson and Stavros Mendros, will respond to your request for verification of reporting by the above two PACs.

You have specifically asked:

Which entity received these payments? See Table A, and Table B, first sent to me on May 10th, 2012 for the Payment transactions.

Table A identifies four transactions, reported by "People of Lewiston and Auburn Committee" and dated 10/13 - $25,000; 10/13 -$140,000, 10/18 - $160,000 and 10/26 - $53,419.73. All four of these contributions were received directly by Dome Messaging, at the request of the Campaign's manager, Stavros Mendros. As both Mr. Mendros and Mr. Robinson have stated to the Commission, their effort to pass the referendum was "late and under-funded" and time was of the essence, so the payments were sent directly to Dome Messaging so they could purchase media immediately. Even a 24-hour delay may have been strategically costly, so the funds were sent directly to the end-user, Dome Messaging.

The original source of the contributions into the PAC was from GT Source. As testified before the Commission, Mr. Robinson called the Ethics Commission to ask about reporting the funds. At the time of the first contributions M Five was in creation, and did not have any of its own funding. M Five's purpose, again as stated to the Commission, was to develop the Lewiston Casino after the election if successful.

Table B identifies three transactions reported by "Green Jobs for Me Committee" dated 8/12 for $5,000; 9/01 for $2,200; and $9/22 for $26,000. Each of these contributions were originally received by Great Falls Recreation & Redevelopment, LLC, and transferred to Green Jobs for Me. The funds were used for multiple purposes, including transfers immediately to Dome Messaging, but also for rent and other expenses of the PAC.

Again, the original source of these contributions was believed to be from GT Source and was reported as such by Mr. Robinson, believing he was instructed by Commission staff to report in this manner.

Cell 207 458-9893 226 Water St. Hallowell Me. 04347 Office 207 621-8188

You also ask for documents from the financial institutions of the PACs or from Dome Messaging that identifies the source of the funds for the above referenced seven transactions.

With this letter, I am also writing Dome Messaging requesting they provide financial statements showing the receipt of the amounts listed in Table A, and the source of those funds. A Dome representative has said they will provide this information substantiating the source of the transfer.

The funds received into Table B were from GT Source, and were received among other financial transactions without clear identification other than an account number. No further information is available regarding these transfers into the TD Bank account used by the PACs.

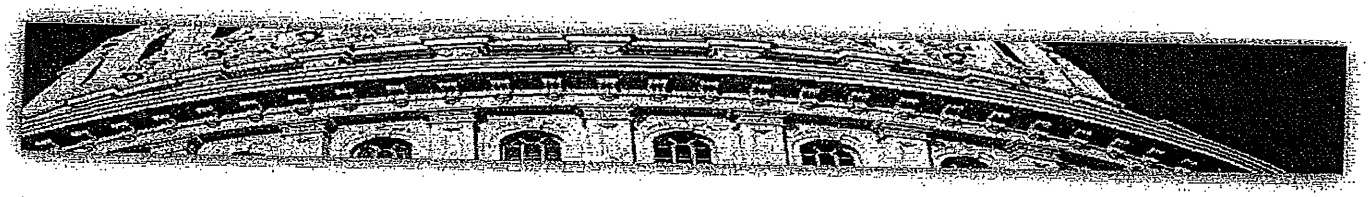
With this, my clients hope to have satisfied the substance of your requests. We expect Dome Messaging will provide the backup data you have requested. The other questions have been answered in full.

If you have additional questions please contact me at my office, address and phone number below. Thank you for working with my clients on this matter, they have tried to answer in full all requests for information.

Sincerely,

Mark L. Walker, Esq.
Law Office of Mark L. Walker
226 Water St.
Hallowell, Maine 04347

207-621-8188 (Office)
207-458-9893 (Cell)



DOME MESSAGING

WWW.DOMEMESSAGING.COM

INVOICE

0010

9/21/11

GREEN JOBS FOR ME PAC
PO Box 641
Lewiston, ME 04243

DUE ON RECEIPT

ITEM	NET DUE
Planning fees for September 2011	7500.00
Statewide survey (poll)	16000.00

TOTAL $ 23500.00

Payable by wire with instructions provided or to address below. **Please note address below for campaign finance reporting purposes and item descriptions above.**

2776 S. ARLINGTON MILL DR • SUITE # 136 • ARLINGTON, VA 22206

From: Dome Messaging [mailto:information@domemessaging.com]
Sent: Tuesday, October 25, 2011 10:48 AM
To: 'Peter Robinson'
Subject: RE: PAC Report

Peter, for reporting here are our expenses and dates when payments were made:

10/13/2011	Street signs	$15,579.00
10/13/2011	Printed Cards	$6,801.00
10/13/2011	Media Production	$5,882.00
10/13/2011	Data purchase	$4,600.00
10/13/2011	Television Airtime	$33,420.00
10/18/2011	Cable Television Purchase	$42,684.00
10/20/2011	Television Airtime	$60,510.00
10/25/2011	Planning Fees	$10,000.00

From: Dome Messaging [mailto:information@domemessaging.com]
Sent: Monday, October 31, 2011 11:09 AM
To: 'Peter Robinson'
Subject: RE: 24-hour reports

We are 100% aware

From: Peter Robinson
Sent: Monday, October 31, 2011 1:07 PM
To: 'Dome Messaging'
Subject: 24-hour reports

Just a reminder that any expenditures over $500 need to be reported within 24 hours.

From: Dome Messaging [mailto:information@domemessaging.com]
Sent: Tuesday, November 01, 2011 9:55 AM
To: 'Peter Robinson'
Cc: 'Stavros J. Mendros'
Subject: expenditure
Peter, this is the first of what will be MANY expenditures. It is up to you if you want to file these individually or daily. I would probably suggest daily at like 4:15 PM each day.

$739.101-NovAndroscoggin County

I would list this as PHONE SERVICES $739.10

From: Peter Robinson
Sent: Thursday, November 03, 2011 8:43 AM
To: Dome Messaging
Subject: Re: huge reporting today

Just FYI, any expense incurred yesterday (Wednesday), regardless of the time of day, can be filed as late as 11:59 PM tonight. Any expense incurred today can be filed as late as 11:59 PM Friday night. I confirmed this with Cindy Sullivan in the Maine Ethics Commission office a few days ago, and she gave me the same answer she gave me last year, when I asked her the same question. Just FYI.

- Peter
-----Original Message-----
From: Dome Messaging
Sent: Nov 3, 2011 7:35 AM
To: 'Peter Robinson'
Subject: huge reporting today

Peter I am going to have some huge stuff for 24-reporting today!

One clump can go out today – that should be filed around 3 PM based on the law.

Another clump can be filed tomorrow – that can be filed late, late in the day. After 4 PM. Maybe 4:05.

From: Dome Messaging [mailto:information@domemessaging.com]
Sent: Thursday, November 03, 2011 3:33 PM
To: Peter Robinson
Subject: today's 24 PAC REPORT
For today's 24-Hour PAC report Peter please note the following was incurred yesterday afternoon from Dome Messaging.

2-Nov	Live Calls	$45,130.66

From: Dome Messaging [mailto:information@domemessaging.com]
Sent: Friday, November 04, 2011 10:08 AM
To: Peter Robinson

Subject: 24 report for Today -- Friday
For your 24 report for today, Friday. NOTE: you will need to confirm with your donors the incoming monies, etc from the PAC. Reminder, we are only reporting expenditures:

3-Nov	Television Airtime	$44,645.00
3-Nov	Radio Airtime	$64,504.94
3-Nov	Web Advertising	$1,000.00
3-Nov	Radio Ad Production	$660.00

DENNIS BAILEY LEFT OUT SEVERAL OF THESE ARTICLES WHICH ANSWER ALL OF THE QUESTIONS:

http://www.sunjournal.com/city/story/1100963 -- "Barrett estimated that a casino developed by Great Falls Recreation and Redevelopment LLC and a to-be-named partner could bring 300 to 500 jobs"

http://www.sunjournal.com/news/city/1112373 --- "We've planned all along to bring in other partners," Mendros said. "None of us has any experience running a casino, and we've never said or implied anything else. We'll need help, because that was the plan all along."

http://www.mpbn.net/News/YourVote2011/tabid/1134/ctl/ViewItem/mid/4020/ItemId/18773/Default.aspx ---- "Dr. Ron Chicoine, one of the local investors, says his group has not signed a contract for any deal. As for making an offer, Chicoine had this to say: "Eventually we're going to be looking to work with professionals who know this business, but right now we have no signed contract with anybody. Any deals or offers we would make would be confidential and when they were completed, then we'd have two parties signing on it, you know?"

http://www.sunjournal.com/news/city/0001/11/30/georgia-based-slot-machine-maker-helps-back-lewiston-casino-campaign/1104039 --- "Dwayne Graham, chief executive officer of GTSource Corp., a Kennesaw, Ga. company said Friday his company was helping finance the campaign because he liked the concept of revitalizing the mill and making the downtown more vibrant. Graham also said his company saw the proposed casino as a chance to sell machines in Maine. "That's what we would hope, it would be a new market for us to go into," Graham said. Graham said he hoped to help the campaign financially but said he wouldn't disclose how much. "We're looking to help out as much as we can, but I do have a limit and I'm not going to discuss what that is

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

May 8, 2013

By E-Mail and Regular Mail
Kate R. Knox, Esq.
Bernstein, Shur, Sawyer & Nelson, P.A.
P.O. Box 9729
Portland, ME 04104-5029

Dear Ms. Knox:

Thank you for contacting the Maine Ethics Commission to provide information on behalf of your clients Ryan Hill and Scott Nash. This letter is to seek a summary confirmation of some of the information we have received to date. Please provide a response by Friday, May 17, 2013, if possible.

1. Based on the bank records we received, it appears M Five, Inc. received income totaling $461,000 during the period of October 1 to December 31, 2011 in the following amounts.

$260,000	WWG Technologies, LLC
$50,000	Incentovation
$150,000	Chase Burns
$1,000	Unknown
$461,000	Total

Please confirm whether this table is accurate and identify the source providing the $1,000 (on October 3, 2011).

2. Please confirm whether M Five, Inc. received any cash directly from GT Source Corporation at any time.

3. What share of M Five, Inc. was owned by GT Source Corporation? Why did M Five, Inc. issue stock to GT Source Corporation, if GT Source Corporation provided no financing to M Five, Inc.?

4. What was the source of funds that WWG Technologies and Incentovation used to make the following payments:

Date	Amount	Payor	Payee
09/22/2011	$121,000	WWG Technologies, LLC	Great Falls Recreation and Redevelopment, LLC
10/05/2011-10/18/2011	$260,000 (4 payments)	WWG Technologies, LLC	M Five, Inc.
10/26/2011	$45,000	Incentovation	M Five, Inc.
12/06/2011	$5,000	Incentovation	M Five, Inc.

5. Did GT Source Corporation provide any funds to WWG Technologies, LLC or Incentovation for the payments listed in the table in question 4?

6. To the best of your clients' knowledge, did GT Source Corporation provide any funding whatsoever for the political campaign in support of the Lewiston Casino initiative?

7. What is your clients' understanding of Dwayne Graham's role in the campaign, and whether he would have had any role in deciding how campaign funds were spent?

Thank you for your clients' cooperation.

Sincerely,

Jonathan Wayne
Executive Director

207 774-1200 main
207 774-1127 facsimile
bernsteinshur.com

BERNSTEIN SHUR

COUNSELORS AT LAW

100 Middle Street
PO Box 9729
Portland, Maine 04104-5029

Kate R. Knox, Esq.
kknox@bernsteinshur.com

May 15, 2013

Commission on Governmental Ethics and Election Practices
Jonathan Wayne
Executive Director
135 State House Station
Augusta ME 04333-0135

Dear Mr. Wayne:

This letter is to provide a confirmation of the information you have received to date on behalf of my client WWG Technologies, LLC. For ease of understanding, we have listed our answers directly after the posed questions.

1. Based on the bank records we received, it appears M Five, Inc. received income totaling $461,000 during the period of October 1 to December 31, 2011 in the following amounts. Please confirm whether this table is accurate and identify the source providing the $1,000 (on October 3, 2011).

- ***Yes – the table is accurate. The additional $1,000 was received from WWG Technologies.***

2. Please confirm whether M Five, Inc. received any cash directly from GT Source Corporation at any time.

- ***M Five, Inc. did not receive any funds directly or indirectly from GT Source Corporation at any time.***

3. What share of M Five, Inc. was owned by GT Source Corporation? Why did M Five, Inc. issue stock to GT Source Corporation, if GT Source Corporation provided no financing to M Five, Inc?

- ***GT Source Corporation owned 200 shares of M Five, Inc. as of November 7, 2011 (which equated to 15.38% of ownership). GT Source Corporation was awarded these shares for helping develop the initial Lewiston Casino business***

plan and for its expertise that would have been needed in the event the referendum was successful.

4. What was the source of funds that WWG Technologies and Incentovation used to make the following payments:

Date	Amount	Payor	Payee
9/22/2011	$121,000	WWG Technologies, LLC	Great Falls Recreation and Redevelopment, LLC
10/5/2011-10/18/2011	$260,000 (4 Payments)	WWG Technologies, LLC	M Five, Inc.
10/26/2011	$45,000	Incentovation	M Five, Inc.
12/6/2011	$5,000	Incentovation	M Five, Inc.

- ***The source of all payments listed above was income from existing business operations unrelated to the casino referendum in Maine.***

5. Did GT Source Corporation provide any funds to WWG Technologies, LLC or Incentovation for the payments listed in the table in questions 4?

- ***No***

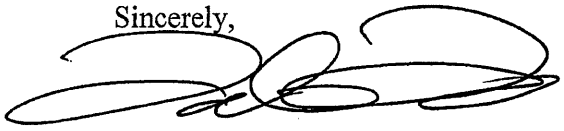
6. To the best of your clients' knowledge, did GT Source Corporation provide any funding whatsoever for the political campaign in support of the Lewiston Casino initiative?

- ***No – to the best of their knowledge, GT Source Corporation did not provide any funds to the political campaign.***

7. What is your clients' understanding of Dwaye Graham's role in the campaign, and whether he would have had any role in deciding how campaign funds were spent?

- ***It was my clients understanding that Dwayne Graham would have no role in the campaign strategy including deciding how campaign funds were spent.***

Sincerely,



Kate R. Knox, Esq.

KRK/rc

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

January 27, 2012

Mark L. Walker, Esq.
Law Office of Mark L. Walker
226 Water Street
Hallowell, ME 04347

Peter D. Robinson
Treasurer, Green Jobs for ME
PO Box 641
Lewiston, ME 04243

Dear Sirs:

Thank you for your presentation at the January 25, 2012 meeting of the Maine Ethics Commission in response to the complaint filed by Casinos*NO!* The complaint requested that the Commission investigate the completeness and accuracy of campaign finance reports filed by Green Jobs for ME and People of Lewiston and Auburn Committee. The Commissioners considered your oral testimony and your written responses, which they had received in advance of the meeting.

At the meeting, the Commissioners voted unanimously pursuant to 1 M.R.S.A. § 1003(2) to authorize the Commission staff to conduct an investigation, because the request demonstrated sufficient grounds for believing that a reporting violation may have occurred.

It is likely that I will have further requests for information or documents. I will address those to Mr. Walker, unless I hear that I should proceed differently. If you have any questions about the Commission's investigation, please call me at 287-4179.

Sincerely,

Jonathan Wayne
Executive Director

cp

cc: Dennis Bailey, Casinos*NO!*

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

December 28, 2011

Stavros J. Mendros
Manager, Green Jobs for ME
Manager, Great Falls Recreation & Development, LLC
135 Hogan Road
Lewiston, ME 04240

Peter D. Robinson
Treasurer, Green Jobs for ME
P.O. Box 641
Lewiston, ME 04243

Dear Sirs:

The Maine Commission on Governmental Ethics and Election Practices received the attached complaint against the Green Jobs for ME political action committee (referred to below as "the PAC") and the People of Lewiston and Auburn Committee. The complaint by Casinos*NO!* questions:

- whether GT Source Corporation was the actual source of funding for $33,200 reportedly received by the PAC,
- whether M Five, Inc. or other organizations associated with Scott Nash spent money to promote the Lewiston Casino citizen initiative, and
- whether Dome Messaging was the actual payee that received campaign expenditures from the PAC.

This letter is to notify you of the PAC's opportunity to respond to the complaint and to request that the PAC provide preliminary information and documents no later than January 11, 2012. The information and documents will assist the Commissioners in deciding whether to conduct an investigation, when they meet on January 25, 2012.

Requirements for PACs to Report Contributions and Expenditures

Political action committees are required to report contributions and expenditures under 21-A. M.R.S.A. §§ 1060(4) & (6). They are also required to keep certain records of their financial activity for four years under 21-A. M.R.S.A. § 1057.

Commission's Consideration of this Matter

Under the Commission's statute, "a person may apply in writing to the commission requesting an investigation" concerning "contributions ... to and expenditures by a ... political action committee ...." (21-A M.R.S.A. § 1003) Under the Commission's Rules, all decisions to conduct an investigation are made by the members of the Commission at

a public meeting. (Chapter 1, Section 5) The Commission is required by the statute to conduct an investigation "if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred." (21-A M.R.S.A. § 1003(2))

The members of the Commission will meet next on Wednesday, January 25, 2012 at 9:00 a.m. At the meeting, the Commissioners are scheduled to determine whether they wish to conduct an investigation into matters raised by the Casinos*NO!* complaint.

Your Opportunity to Respond

The PAC is welcome to respond to the complaint by submitting a written response by Wednesday, January 11, 2012. In addition, the Commission staff requests the documents and information listed below in order to assist the Commissioners in determining whether it is required to conduct further investigation into this matter.

The Commission staff recommends that a representative of the PAC who has personal knowledge of the PAC's campaign activities and financial reporting attend the Commission's January 25, 2012 meeting to answer questions from the Commissioners.

Requested Documents and Information

Please provide the following documents and information no later than Wednesday, January 11, 2012.

Requested Documents

Request #1: The PAC's record of all contributions to the PAC (including the name and address of each contributor), which the PAC was required to keep under the Campaign Reports and Finances Law (21-A M.R.S.A. § 1057(3))

Request #2: Images of checks by which GT Source Corporation made the following three contributions reported by the PAC:

Table A		
08/12/11	GT Source	$5,000.00
09/01/11	GT Source	$2,200.00
09/22/11	GT Source	$26,000.00

If the PAC did not keep copies of the checks, they may be available from the PAC's financial institution. If the PAC received the three contributions from GT Source through some other means (e.g., electronic transfer), the Commission requests some other document from the PAC's

financial institution verifying that GT Source was the source of the contributions reported by the PAC.

Request #3 Images of payment checks made by the PAC to Dome Messaging for the following expenditures in Table B reported by the PAC. If the PAC did not keep copies of the payment checks, they may be available from your financial institution.

Table B			
09/22/11	Dome Messaging	Polling and survey research	$16,000.00
09/22/11	Dome Messaging	Campaign consultants	$7,500.00

Request #4: Images of receipts or invoices from Dome Messaging stating the particular good or services purchased by the PAC, which the PAC was required to retain under the Campaign Reports and Finances Law (21-A M.R.S.A. § 1057(2)) for the expenditures in Table B. If the PAC did not obtain invoices or receipts from Dome Messaging, please confirm that.

Requested Information

Request #5: Please identify the individual(s) who filed the PAC's campaign finance reports for the PAC in 2010 and 2011.

Request #6 Please identify the individual(s) who managed the PAC's operation and campaign activities in support of the November 8, 2011 Lewiston casino citizen initiative (referred to below as "Question 3").

Request #7 Please identify the individual(s) involved in the PAC who made arrangements with Dome Messaging concerning the polling and consulting services purchased to support Question 3.

Request #8 Please describe the role of Scott Nash in the campaign to promote Question 3.

Request #9 Please confirm whether GT Source Corporation made the three contributions listed in Table A. If another source provided these amounts, please identify the other source.

Request #10: Did M Five, Inc. or any firm associated with Scott Nash (*e.g.*, IncentOvation, or Wild West Gaming) spend any money to promote Question 3, including by making contributions to another organization, by

paying vendors directly, or by compensating Scott Nash or other campaign staff?

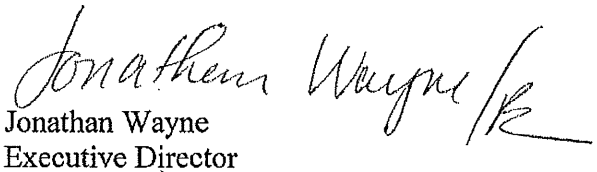
Request #11: Please describe the relationship between Green Jobs for ME and Great Falls Recreation & Development, LLC. It appears that the members of the LLC were the primary funders of the PAC.

Request #12: Did any representative of M Five, Inc. sign the proposed Option Agreement provided by Mr. Bailey?

Request #13 Did Great Falls Recreation & Development, LLC enter into any other agreement under which a party to the agreement promised to provide management or funding for the campaign to promote the November 8, 2011 Lewiston casino citizen initiative?

If you have any questions concerning this request or the Commission's procedures, please call me at 287-4179. I will be returning to the office on the afternoon of Monday, January 2, 2012.

Sincerely,



Jonathan Wayne
Executive Director

cc: Dennis Bailey, Casinos*NO!*

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

December 28, 2011

Chief William Welch
Treasurer, People of Lewiston and
Auburn Committee
134 Main Street
Lewiston, ME 04240

Hon. Laurent F. Gilbert, Sr.
Principal Officer, People of Lewiston
and Auburn Committee
39 Cote Street
Lewiston, ME 04240

Dear Sirs:

The Maine Commission on Governmental Ethics and Election Practices received the attached complaint against the People of Lewiston and Auburn Committee (referred to below as "the PAC") and the Green Jobs for ME political action committee. The complaint by Casinos*NO!* questions:

- whether GT Source Corporation was the actual source of funding for $378,419 reportedly received by the PAC,
- whether M Five, Inc. or other organizations associated with Scott Nash spent money to promote the November 8, 2011 Lewiston casino citizen initiative, and
- whether Dome Messaging was the actual payee that received campaign expenditures from the PAC.

This letter is to notify you of the PAC's opportunity to respond to the complaint and to request that the PAC provide preliminary information and documents no later than January 11, 2012. The information and documents will assist the Commissioners in deciding whether to conduct an investigation, when they meet on January 25, 2012.

Requirements for PACs to Report Contributions and Expenditures

Political action committees are required to report contributions and expenditures under 21-A. M.R.S.A. §§ 1060(4) & (6). They are also required to keep certain records of their financial activity for four years under 21-A. M.R.S.A. § 1057.

Commission's Consideration of this Matter

Under the Commission's statute, "a person may apply in writing to the commission requesting an investigation" concerning "contributions ... to and expenditures by a ... political action committee ...." (21-A M.R.S.A. § 1003) Under the Commission's Rules, all decisions to conduct an investigation are made by the members of the Commission at a public meeting. (Chapter 1, Section 5) The Commission is required by the statute to

conduct an investigation "if the reasons stated for the request show sufficient grounds for believing that a violation may have occurred." (21-A M.R.S.A. § 1003(2))

The members of the Commission will meet next on Wednesday, January 25, 2012 at 9:00 a.m. At the meeting, the Commissioners are scheduled to determine whether they wish to conduct an investigation into matters raised by the Casinos*NO!* complaint.

Your Opportunity to Respond

The PAC is welcome to respond to the complaint by submitting a written response by Wednesday, January 11, 2012. In addition, the Commission staff requests the documents and information listed below in order to assist the Commissioners in determining whether it is required to conduct further investigation into this matter.

The Commission staff recommends that a representative of the PAC who has personal knowledge of the PAC's campaign activities and financial reporting attend the Commission's January 25, 2012 meeting to answer questions from the Commissioners.

Requested Documents and Information

Please provide the following documents and information no later than Wednesday, January 11, 2012.

Requested Documents

Request #1: The PAC's record of all contributions to the PAC (including the name and address of each contributor), which the PAC was required to keep under the Campaign Reports and Finances Law (21-A M.R.S.A. § 1057(3))

Request #2: Images of checks by which GT Source Corporation made the following four contributions reported by the PAC:

Table A		
10/13/2011	GT Source	$25,000.00
10/13/2011	GT Source	$140,000.00
10/18/2011	GT Source	$160,000.00
10/26/2011	GT Source	$53,419.73

If the PAC did not keep copies of the checks, they may be available from the PAC's financial institution. If the PAC received the four contributions from GT Source through some other means (e.g., electronic transfer), the Commission requests some other document from the PAC's financial

institution verifying that GT Source was the source of the contributions reported by the PAC.

Request #3 Images of payment checks made by the PAC to Dome Messaging for the following expenditures in Table B reported by the PAC. If the PAC did not keep copies of the payment checks, they may be available from your financial institution.

Table B			
10/13/2011	Dome Messaging	TV or cable ads	$33,420.00
10/13/2011	Dome Messaging	Other	$4,600.00
10/13/2011	Dome Messaging	Radio ads, production costs	$5,882.00
10/13/2011	Dome Messaging	Campaign literature (printing and graphics)	$6,801.00
10/13/2011	Dome Messaging	Campaign literature (printing and graphics)	$15,579.00
10/18/2011	Dome Messaging	TV or cable ads	$42,684.00
10/20/2011	Dome Messaging	TV or cable ads	$60,510.00
10/25/2011	Dome Messaging	Campaign consultants	$10,000.00
11/1/2011	Dome Messaging	Phone banks, automated telephone calls	$739.10
11/2/2011	Dome Messaging	Phone banks, automated telephone calls	$45,130.66
11/3/2011	Dome Messaging	TV or cable ads	$44,645.00
11/3/2011	Dome Messaging	TV or cable ads	$64,504.94
11/3/2011	Dome Messaging	Internet and e-mail	$1,000.00
11/3/2011	Dome Messaging	Radio ads, production costs	$660.00
11/5/2011	Dome Messaging	Phone banks, automated telephone calls	$4,742.35
11/7/2011	Dome Messaging	Phone banks, automated telephone calls	$10,447.25

Request #4: Images of receipts or invoices from Dome Messaging stating the particular good or services purchased by the PAC, which the PAC was required to retain under the Campaign Reports and Finances Law (21-A M.R.S.A. § 1057(2)) for the expenditures in Table B. If the PAC did not obtain invoices or receipts from Dome Messaging, please confirm that.

Requested Information

Request #5: Please identify the individual(s) who filed the PAC's campaign finance reports on October 12, October 28, and December 20, 2011.

Request #6 Please identify the individual(s) who managed the PAC's operations and campaign activities in support of the November 8, 2011 Lewiston casino citizen initiative (referred to below as "Question 3").

Request #7 Please identify the individual(s) involved in the PAC who made arrangements with Dome Messaging concerning the advertisements, telephone calls, and mailings purchased to support Question 3.

Request #8 Please describe the role of Scott Nash in the campaign to promote Question 3.

Request #9 Please confirm whether GT Source Corporation made the four contributions listed in Table A. If another source provided these amounts, please identify the other source.

Request #10: Did M Five, Inc. or any firm associated with Scott Nash (*e.g.*, IncentOvation, or Wild West Gaming) spend any money to promote Question 3, including by making contributions to another organization, by paying vendors directly, or by compensating Scott Nash or other campaign staff?

Please call me at 287-4179 with any questions concerning this request or the Commission's procedures. I will be returning to the office on the afternoon of Monday, January 2, 2012.

Sincerely,

Jonathan Wayne /PL

Jonathan Wayne
Executive Director

cc: Stavros J. Mendros, Green Jobs for ME
Dennis Bailey, Casinos*NO!*

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

January 13, 2011

Stavros J. Mendros
Manager, Green Jobs for ME
135 Hogan Road
Lewiston, ME 04240

Peter D. Robinson
Treasurer, Green Jobs for ME
P.O. Box 641
Lewiston, ME 04243

Dear Mr. Mendros and Mr. Robinson,

Thank you for your response of yesterday. This letter is to make two requests for additional information and to follow up on previously requested documents and information. Please respond by Monday, January 23, so that the Commissioners may consider the information and documents when they meet on January 25.

New Requests

Request #14 Please identify the individual at Dome Messaging who is most knowledgeable about the services it rendered to the PACs, along with that person's mailing address and phone number.

Request #15 To the best of your (both Mr. Mendros and Mr. Robinson) knowledge, did GT Source Corporation receive funds from any other source in order to make the contributions to the PACs or to reimburse GT Source for the contributions it made to the PACs? If so, please identify those other sources and the amounts which GT Source received.

Previous Requests for Documents and Information

Request #1: In addition to the reports filed with the Commission, political action committees are required by law to keep some form of accounting record of all contributions to the PAC, including the name and address of the contributors (21-A M.R.S.A. § 1057(3)). Please provide this record for contributions received in 2011.

Request #2: Please obtain from the PACs' financial institution some document (either an image of a check or a record of an electronic transfer) that identifies the donor which provided the following seven amounts to the PACs:

Contributions to Green Jobs for ME	
08/12/11	$5,000.00
09/01/11	$2,200.00
09/22/11	$26,000.00

Contributions to People of Lewiston and Auburn Committee	
10/13/2011	$25,000.00
10/13/2011	$140,000.00
10/18/2011	$160,000.00
10/26/2011	$53,419.73

Request #3 Please provide images of five payment checks or electronic transfers made by the PAC to Dome Messaging for the following expenditures. (We have reduced the previous Request #3 to five expenditures in order to lower the burden on the PAC in responding.)

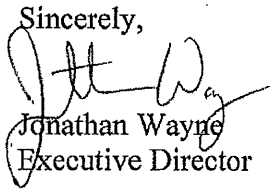
Table B (modified)		
10/18/2011	TV or cable ads	$42,684.00
10/20/2011	TV or cable ads	$60,510.00
11/2/2011	Phone banks, automated telephone calls	$45,130.66
11/3/2011	TV or cable ads	$44,645.00
11/3/2011	TV or cable ads	$64,504.94

Request #4: Please provide images of receipts or invoices from Dome Messaging stating the particular services purchased by the PAC, which the PAC was required by law to retain (21-A M.R.S.A. § 1057(2)). If the PAC did not obtain invoices or receipts from Dome Messaging, explain how Dome Messaging billed the PAC and provide any documentation describing the services provided to the PAC and the amounts charged for those services.

I have also enclosed a copy of the Option Agreement which our office inadvertently did not enclose with our December 28 letters. It appears that the agreement is signed by each of you but not by a representative of M Five, Inc.

Since I was contacted by attorney Mark L. Walker, Esq., I am copying him on this letter, although I am not sure if he is serving as your attorney or providing informal advice.

Sincerely,



Jonathan Wayne
Executive Director

cc: Mark L. Walker, Esq. (By E-Mail and Regular Mail)

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

March 30, 2012

By E-Mail and Regular Mail
Mark L. Walker, Esquire
226 Walker Street
Hallowell, ME 04347

REQUEST FOR DOCUMENTS

Dear Mr. Walker,

As you are aware, at the January 25, 2012 meeting, the Maine Commission on Governmental Ethics and Election Practices directed its staff to investigate the compliance of campaign finance reports submitted by Green Jobs for Maine and People of Lewiston and Auburn committee.

This letter is to request documents in the possession of or that may be obtained by Green Jobs for Maine, the People of Lewiston and Auburn Committee, Stavros J. Mendros and Peter D. Robinson (referred to below as "the respondents"). Please provide to the Commission the requested documents no later than Friday, April 13, 2012.

For purposes of this request, document means any written, recorded, or graphic material of any kind containing written, printed or digitally or electronically stored material.

Requested Documents

Please provide a document from the respondents' financial institution (such as a deposit slip, bank statement, image of a check or record of an electronic transfer) that identifies the donor which provided the following amounts to Green Jobs for Maine:

Contributions to Green Jobs for ME	
08/12/11	$5,000.00
09/01/11	$2,200.00
09/22/11	$26,000.00

Please provide all documents containing communications between Dome Messaging and any of the respondents concerning any financial transaction made to promote the 2011 Lewiston casino citizen initiative, including but not limited to money received or paid by the respondents, Dome Messaging, GT Source Corporation or M Five, Inc.

Confidentiality of Investigation

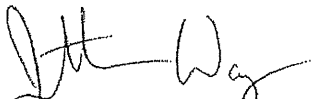
The Maine Election Law authorizes the Commission to keep certain categories of information and records ("investigative working papers") confidential in the course of conducting an investigation. (21-A M.R.S.A. § 1003(3-A)) These categories include:

- financial information not normally available to the public, and
- information belonging to a political action committee or ballot question committee that, if disclosed, would reveal sensitive political or campaign information.

The Commission staff will keep information and records provided by the respondents in these categories confidential.

Thank you very much for your cooperation with this request.

Sincerely,



Jonathan Wayne
Executive Director

Wayne, Jonathan

From: Wayne, Jonathan
Sent: Thursday, May 10, 2012 4:33 PM
To: 'mwalker.hallowell@gmail.com'
Cc: Lavin, Paul; Marett, Matthew
Subject: Request for Information and Documents

Mark,

Thank you for phone call advising me that your clients intend to respond to our request. The Commissioners have requested that the staff verify the reporting by the PACs. The staff is trying to obtain documents and information that is reasonable, under the circumstances. If the staff has to resort to using the Commission's power to subpoena documents and testimony (through depositions), the staff is prepared to do that. We would prefer not to.

My understanding is that the Commission is not interested in doing any further investigation concerning Dome Messaging. The Commission staff is chiefly interested in verifying how the out-of-state money flowed into the campaign, and whether it came directly from GT Source or M Five, Inc. I am referring to the following 7 amounts reported by the PACs:

Table A Contributions from GT Source Reported by People of Lewiston and Auburn Committee	
10/13/2011	$25,000.00
10/13/2011	$140,000.00
10/18/2011	$160,000.00
10/26/2011	$53,419.73

Table B Contributions from GT Source Reported by Green Jobs for ME	
08/12/11	$5,000.00
09/01/11	$2,200.00
09/22/11	$26,000.00

Request for Explanation

For each those seven transactions, please provide a narrative explanation in a letter that states:

(1) Which entity received these payments? (i.e., the PAC that reported the contribution, or Dome Messaging)
(2) Which entity made the payments? (i.e., M Five, Inc., or GT Source Corporation)

If any of those dates and amounts are inaccurate, please disclose that and provide a correct list of dates and amounts.

Request for Documents

For each of those seven transactions, please provide documents from the financial institutions of the PACs or of Dome Messaging that identifies the source that paid those specific amounts.

If I can receive these in the middle of next week, there is a good chance that I can report back to the Commissioners at the May 30 meeting.

Thank you.

Jonathan Wayne
Executive Director
Maine Ethics Commission
135 SHS
Augusta, ME 04333
287-4179

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

May 31, 2012

By E-Mail and Regular Mail
Mark L. Walker, Esq.
226 Water Street
Hallowell, ME 04347

Dear Mr. Walker:

This letter is to follow up on my document request made through the attached email dated May 10, 2012. The request is a narrow one for the key documents which will assist the Commission staff in verifying the out-of-state sources of funds for the 2011 pro-Lewiston casino campaign.

Firm Date

Please respond by e-mail or letter with a firm date in the next two weeks by which your clients will provide the documents. Some of the documents may require the cooperation of Dome Messaging.

Potential Subpoenas

If I do not receive a response, the Commission staff will use the agency's subpoena power to retrieve the documents from your clients *and* from Dome Messaging. The subpoenas may require sworn testimony, and the scope of the requested documents may increase. Please advise whether you will accept service of a subpoena on behalf of Stavros Mendros, Peter Robinson, Great Falls Recreation & Development LLC, and the two political action committees.

Thank you.

Sincerely,

Jonathan Wayne
Executive Director

cc: Assistant Attorney General Phyllis Gardiner

OFFICE LOCATED AT: 45 MEMORIAL CIRCLE, AUGUSTA, MAINE
WEBSITE: WWW.MAINE.GOV/ETHICS
PHONE: (207) 287-4179
FAX: (207) 287-6775

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

June 14, 2012

By E-Mail and Regular Mail
Mark L. Walker, Esq.
226 Water Street
Hallowell, ME 04347

Dear Mr. Walker,

Would you have time to speak to me tomorrow or Monday, June 18 concerning whether you will accept service of subpoenas on behalf of Stavros Mendros and Peter Robinson. The subpoenas (which are already drafted in consultation with the Commission's Counsel) would be addressed to them individually, and as an officer or decision-maker for People of Lewiston and Auburn Committee, Green Jobs for ME, and Great Falls Recreation & Development LLC. It may be necessary to serve a subpoena on Dome Messaging as well, but I recognize that the firm is not your client.

The request by the Commission staff for documents is reasonable and necessary. We rarely have need to use of the agency's subpoena power, but it appears necessary after making multiple requests for the documents that would verify the PAC reporting and not receiving them.

Thank you.

Sincerely,

Jonathan Wayne
Executive Director

OFFICE LOCATED AT: 45 MEMORIAL CIRCLE, AUGUSTA, MAINE
WEBSITE: WWW.MAINE.GOV/ETHICS
PHONE: (207) 287-4179
FAX: (207) 287-6775

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

June 15, 2012

Mark L. Walker, Esq.
Attorney at Law
226 Water Street
Hallowell, ME 04347

Dear Mr. Walker:

This is to confirm our conversation of today in which you stated that you will be verifying whether your clients will produce the information and documents requested in my May 30, 2012 letter by Monday, June 25.

If not, I will be asking you whether you will accept service of investigative subpoenas by the Commission, as an alternative to personal service on your clients directly.

Thank you.

Sincerely,

Jonathan Wayne
Executive Director

OFFICE LOCATED AT: 45 MEMORIAL CIRCLE, AUGUSTA, MAINE
WEBSITE: WWW.MAINE.GOV/ETHICS
PHONE: (207) 287-4179
FAX: (207) 287-6775

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

March 30, 2012

By E-Mail and Regular Mail
Dome Messaging
2776 S. Arlington Mill Drive, Suite 136
Arlington, VA 22206

REQUEST FOR DOCUMENTS

Dear Sir/Madam,

At the January 25, 2012 meeting, the Maine Commission on Governmental Ethics and Election Practices directed its staff to investigate the compliance of campaign finance reports submitted by Green Jobs for Maine and People of Lewiston and Auburn committee (referred to below as "the PACs").

According to Stavros Mendros, Dome Messaging received amounts of money (including from the funders of the PACs) to buy goods and services to promote the 2011 Lewiston casino citizen initiative. The Commission must request documents in the possession of Dome Messaging or its financial institutions, in order to verify the dates and amounts of contributions reported by the PACs, and whether the PACs' identification of donors was accurate.

Request for Documents

This letter is to request that Dome Messaging provide to the Commission by Friday, April 20 all documents in the possession of Dome Messaging or its financial institutions *relating to money received by Dome Messaging*, from any source including but not limited to GT Source Corporation and M Five, Inc., in connection with the 2011 Lewiston casino citizen initiative.

For purposes of this request, document means any written, recorded, or graphic material of any kind containing written, printed or digitally or electronically stored material. This would include records in the following categories which relate to money received by Dome Messaging from any source in connection with the 2011 Lewiston casino citizen initiative:

- accounting or bookkeeping records kept by Dome Messaging;
- documents maintained by Dome Messaging's financial institution such as records of electronic transfers, deposit slips, or bank account statements; and

- electronic mail or other communications between the Dome Messaging and the PACs or the PACs' funders.

Confidentiality of Investigation

The Maine Election Law authorizes the Commission to keep certain categories of information and records ("investigative working papers") confidential in the course of conducting an investigation. (21-A M.R.S.A. § 1003(3-A)) These categories include:

- financial information not normally available to the public, and

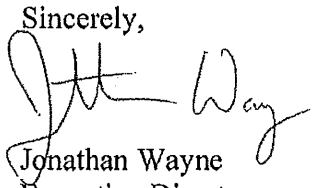
- information belonging to a political action committee or ballot question committee that, if disclosed, would reveal sensitive political or campaign information.

The Commission staff will keep information and records provided by Dome Messaging in these categories confidential.

Also, if you would like to redact all information from the documents that is unrelated to the 2011 Lewiston casino citizen initiative, the Commission staff has no objection.

If you have any questions concerning this request, please call me at 287-4179 or e-mail me at Jonathan.Wayne@maine.gov. Thank you very much for your cooperation with this request.

Sincerely,



Jonathan Wayne
Executive Director

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

July 26, 2012

By E-Mail and Regular Mail
Dome Messaging
2776 S. Arlington Mill Drive, Suite 136
Arlington, VA 22206

SECOND REQUEST FOR DOCUMENTS

Dear Sir/Madam,

For our investigation of the 2011 Lewiston casino PACs, the Maine Ethics Commission requests account statements (or another type of document from your credit union) that shows the account number and routing number for the following four payments received by Dome Messaging:

10/13/2011	$25,000.00
10/13/2011	$140,000.00
10/18/2011	$160,000.00
10/26/2011	$53,419.73

Please provide them by Friday, August 10 to avoid a subpoena.

If you have any questions, please call me at 287-4179 or e-mail me at Jonathan.Wayne@maine.gov. Thank you very much for your cooperation with this request.

Sincerely,

Jonathan Wayne
Executive Director

cc: Mark L. Walker, Esq.

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

August 23, 2012

By E-Mail and Regular Mail
Dome Messaging
2776 S. Arlington Mill Drive, Suite 136
Arlington, VA 22206

FOLLOW-UP ON SECOND REQUEST FOR DOCUMENTS

Dear Sir/Madam,

Thank you for forwarding an e-mail from congressionalfcu.org concerning wire transfers received by Dome Messaging. The e-mail stated that "They were from M Five Inc." We appreciate your effort in obtaining this information.

To close this piece of the investigation, the Commission staff requires documents from your credit union showing the account number and bank name (or ABA routing number) of the originator of these transfers:

Date	Amount
unknown	$23,500.00
10/05/2011	$80,000.00
10/14/2011	$30,000.00
10/18/2011	$70,000.00
10/26/2011	$45,000.00
11/03/2011	$130,000.00
11/08/2011	$1,250.00

If your credit union charges you for the document production, the Commission will reimburse you within reasonable limits.

If you have any questions, please call me at 287-4179 or e-mail me at Jonathan.Wayne@maine.gov. Thank you very much for your cooperation with this request.

Sincerely,

Jonathan Wayne
Executive Director

OFFICE LOCATED AT: 45 MEMORIAL CIRCLE, AUGUSTA, MAINE
WEBSITE: WWW.MAINE.GOV/ETHICS
PHONE: (207) 287-4179
FAX: (207) 287-6775

Wayne, Jonathan

From: Phillips, Cyndi
Sent: Thursday, December 29, 2011 3:00 PM
To: Wayne, Jonathan; Lavin, Paul
Subject: FW: PAC Reporting, State of Maine Ethics Commission

From: L. Dwayne Graham [mailto:dwayneg@gtsource.com]
Sent: Thursday, December 29, 2011 2:55 PM
To: Phillips, Cyndi; dwayneg@pen-tech.com
Cc: stephk@pen-tech.com
Subject: RE: PAC Reporting, State of Maine Ethics Commission

Cyndi – I will look into this request and get back you next week.

Building Solid Gaming Foundations – Enabling Success

DWAYNE GRAHAM
1640 Airport Road
Suite 105
Kennesaw, GA 30144
404-358-8418 PH)
770-234-6647 (Fax)
dwayneg@gtsource.com
www.gtsource.com

From: Phillips, Cyndi [mailto:Cyndi.Phillips@maine.gov]
Sent: Wednesday, December 28, 2011 11:36 AM
To: dwayneg@pen-tech.com
Cc: stephk@pen-tech.com
Subject: PAC Reporting, State of Maine Ethics Commission

Our Executive Director, Jonathan Wayne, is out of the office until the afternoon of Monday, January 2. He requested that I forward this to you today.

Cyndi Phillips, COMMISSION ASSISTANT
MAINE ETHICS COMMISSION
45 MEMORIAL CIRCLE
MAILING: 135 STATE HOUSE STATION
AUGUSTA, MAINE
207-287-4179
WWW.MAINE.GOV/ETHICS

Wayne, Jonathan

From: Phillips, Cyndi
Sent: Friday, January 06, 2012 8:22 AM
To: Wayne, Jonathan; Lavin, Paul
Subject: FW: PAC Reporting, State of Maine Ethics Commission

From: L. Dwayne Graham [mailto:dwayneg@gtsource.com]
Sent: Thursday, January 05, 2012 1:11 PM
To: Phillips, Cyndi; dwayneg@pen-tech.com
Cc: stephk@pen-tech.com
Subject: RE: PAC Reporting, State of Maine Ethics Commission

Mr. Wayne,

GTSource or myself do not intend to respond to your request at this time. I do thank you for the offer to participate in this request, but I feel that I have spent enough time in trying to help the city of Lewiston and the state of Maine without a positive outcome. The voters have spoken loud and clear and I have moved on.

Again I would like to thank you for your time and service.

Building Solid Gaming Foundations – Enabling Success

DWAYNE GRAHAM
1640 Airport Road
Suite 105
Kennesaw, GA 30144
404-358-8418 PH)
770-234-6647 (Fax)
dwayneg@gtsource.com
www.gtsource.com

From: Phillips, Cyndi [mailto:Cyndi.Phillips@maine.gov]
Sent: Wednesday, December 28, 2011 11:36 AM
To: dwayneg@pen-tech.com
Cc: stephk@pen-tech.com
Subject: PAC Reporting, State of Maine Ethics Commission

Our Executive Director, Jonathan Wayne, is out of the office until the afternoon of Monday, January 2. He requested that I forward this to you today.

Cyndi Phillips, COMMISSION ASSISTANT
MAINE ETHICS COMMISSION
45 MEMORIAL CIRCLE
MAILING: 135 STATE HOUSE STATION
AUGUSTA, MAINE
207-287-4179
WWW.MAINE.GOV/ETHICS

Wayne, Jonathan

From: L. Dwayne Graham <dwayneg@gtsource.com>
Sent: Wednesday, April 18, 2012 3:23 PM
To: Wayne, Jonathan
Cc: stephk@pen-tech.com
Subject: RE: 2011 Maine Casino Election

You already have my official response. Please stop contacting GTSource and myself.

Building Solid Gaming Foundations – Enabling Success

DWAYNE GRAHAM
1640 Airport Road
Suite 105
Kennesaw, GA 30144
404-358-8418 PH)
770-234-6647 (Fax)
dwayneg@gtsource.com
www.gtsource.com

From: Wayne, Jonathan [mailto:Jonathan.Wayne@maine.gov]
Sent: Wednesday, April 18, 2012 11:24 AM
To: dwayneg@gtsource.com
Cc: stephk@pen-tech.com
Subject: 2011 Maine Casino Election

Mr. Graham,

I am hoping we can talk about the subject in my e-mail from April 12 (below).

I would be happy to speak to Stephanie Kersey, if it would save you time.

Thank you.

Jonathan Wayne
Executive Director
Maine Ethics Commission
135 SHS
Augusta, ME 04333
(207) 287-4179

From: Wayne, Jonathan
Sent: Thursday, April 12, 2012 2:11 PM
To: 'dwayneg@gtsource.com'
Subject: 2011 Maine Casino Election

Mr. Graham,

This is to follow up on my voicemail from this afternoon. The State government of Maine is verifying whether the campaign financial information filed with the State in support of the 2011 Lewiston casino was accurate.

I would like to speak to you briefly to confirm whether GT Source Corporation paid these amounts to political consulting firm, Dome Messaging, to support the initiative:

Contributions from GT Source Reported by People of Lewiston and Auburn Committee	
10/13/2011	$25,000.00
10/13/2011	$140,000.00
10/18/2011	$160,000.00
10/26/2011	$53,419.73

and whether GTS contributed these amounts to the limited liability company or political action committee organized by Stavros Mendros:

Contributions from GT Source Reported by Green Jobs for ME	
08/12/11	$5,000.00
09/01/11	$2,200.00
09/22/11	$26,000.00

I am also interested in asking whether GT Source Corporation obtained these funds from any other organization.

I anticipate that it would be a short conversation.

Thank you.

Jonathan Wayne
Executive Director
Maine Ethics Commission
135 SHS
Augusta, ME 04333
(207) 287-4179

STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES

In Re: People of Lewiston and Auburn, Green Jobs for ME	))	**INVESTIGATIVE SUBPOENA TO PRODUCE RECORDS**

To: TD Banknorth
Legal Department, Subpoena Compliance
75 John Roberts Road, Building A
South Portland, ME 04106

YOU ARE HEREBY ORDERED, in the name of the State of Maine Commission on Governmental Ethics and Election Practices, pursuant to 21-A M.R.S.A. § 1003, to produce the following designated materials on or before August 20, 2012, at the offices of the Commission on Governmental Ethics and Election Practices for the State of Maine, located on the second floor of the building at 45 Memorial Circle, Augusta, Maine, by delivering in hand or sending the materials by first class U.S. mail to Jonathan Wayne, Executive Director, Commission on Governmental Ethics and Election Practices, 135 State House Station, Augusta, Maine 04333:

1. Copies of all account statements, cancelled checks, deposit slips, checks deposited into the account, documents reflecting or relating to electronic payments into the account, credit memos and all and any other documents or records relating to funds deposited or paid into an account in the name of Great Falls Recreation & Redevelopment, LLC during August 1, 2012 to September 30, 2012.

This subpoena is issued on behalf of the Commission on Governmental Ethics and Election Practices, in conjunction with a Commission investigation of the People of Lewiston and Auburn Committee and Green Jobs for ME political action committee, pursuant to 21-A M.R.S.A. § 1003(1) & (2). The Commission's attorney is Phyllis Gardiner, Assistant Attorney General, Office of the Attorney General, 6 State House Station, Augusta, Maine 04333-0006. She may be contacted at (207) 626-8830.

WARNING: Failure to comply with this subpoena shall be punishable as for contempt of court, pursuant to 21-A M.R.S.A. § 1003(1) and Rule 66(c) of the Maine Rules of Civil Procedure.

Dated: 7/26/12

WALTER F. MCKEE
Commission on Governmental Ethics
and Election Practices

STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS AND ELECTION PRACTICES

In Re: People of Lewiston and Auburn, Green Jobs for ME	))	**INVESTIGATIVE SUBPOENA TO PRODUCE RECORDS**

To: TD Banknorth
Legal Department, Subpoena Compliance
75 John Roberts Road, Building A
South Portland, ME 04106

YOU ARE HEREBY ORDERED, in the name of the State of Maine Commission on Governmental Ethics and Election Practices, pursuant to 21-A M.R.S.A. § 1003, to produce the following designated materials on or before September 28, 2012, at the offices of the Commission on Governmental Ethics and Election Practices for the State of Maine, located on the second floor of the building at 45 Memorial Circle, Augusta, Maine, by delivering in hand or sending the materials by first class U.S. mail to Jonathan Wayne, Executive Director, Commission on Governmental Ethics and Election Practices, 135 State House Station, Augusta, Maine 04333:

1. Copies of all account statements, cancelled checks, deposit slips, checks deposited into the account, documents reflecting or relating to wire transfers into or out of the account, signature cards, debit or credit memos and any and all other documents or records regarding Account No. [redacted] in the name of Great Falls Recreation Redevelopment LLC for the period of June 1, 2011 to July 31, 2011 and for the period of October 1, 2011 to January 31, 2012.

2. Copies of all account statements, cancelled checks, deposit slips, checks deposited into the account, documents reflecting or relating to wire transfers into or out of the account, signature cards, debit or credit memos and any and all other documents or records regarding Account No [redacted] for the period of June 1, 2011 to January 31, 2012.

This subpoena is issued on behalf of the Commission on Governmental Ethics and Election Practices, in conjunction with a Commission investigation of the People of Lewiston and Auburn Committee and Green Jobs for ME political action committee, pursuant to 21-A M.R.S.A. § 1003(1) & (2). The Commission's attorney is Phyllis Gardiner, Assistant Attorney General, Office of the Attorney General, 6 State House Station, Augusta, Maine 04333-0006. She may be contacted at (207) 626-8830.

WARNING: Failure to comply with this subpoena shall be punishable as for contempt of court, pursuant to 21-A M.R.S.A. § 1003(1) and Rule 66(c) of the Maine Rules of Civil Procedure.

Dated: September 6, 2012

WALTER F. MCKEE
Commission on Governmental Ethics
and Election Practices

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

SUBPOENA

MAINE COMMISSION ON GOVERNMENTAL ETHICS
Plaintiff

vs. Case No: **28568-M**

Defendant

To: **SANDY SPRING BANK**
ATTN: OFFICE OF THE GENERAL COUNSEL
17801 GEORGIA AVENUE
OLNEY MD 20832

You are hereby commanded to personally appear and [**X**] produce the following:

SEE ATTACHMENTS

At TORRI SHAFFER, TORRI LEGAL SERVICES, 13 WINESAP CT., GAITHERSBURG, MD 20878

On **Friday**, the **19th** day of **April, 2013** at **12:00 PM.**

DATE ISSUED: **April 1, 2013**

Loretta E. Knight, CLERK
of the Circuit Court for
Montgomery County, Maryland
50 Maryland Avenue
Rockville, MD 20850-2393

This subpoena was requested by PLAINTIFF , and any questions should be referred to:

PHYLLIS GARDINER
ASSISTANT ATTORNEY GENERAL
6 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0006
(207) 626-8830

NOTICE

(1) You are liable to body attachment and fine for failure to obey this subpoena.

(2) This subpoena shall remain in effect until you are granted leave to depart by the Court, or by an officer acting on behalf of the Court.

(3) If this subpoena is for attendance at a deposition in a civil case, and the party served is an organization, notice is hereby given that the organization must designate a person to testify pursuant to Rule 2-412(d).

Sheriff's Return

[ ] Served on the date indicated below

[ ] Unserved, by reason of _____

Date: _____ _____
Sheriff

Possession and use of cell phones, computers, other electronic devices, and cameras may be limited or prohibited in designated areas of the court facility. The use of any camera, cell phone, or any electronic device for taking, recording, or transmitting photographs, videos, or other visual images is prohibited in the court facility at all times, unless the court expressly grants permission in a specific instance.

In Re: People of Lewiston and Auburn and Green Jobs for ME)

INVESTIGATIVE SUBPOENA TO PRODUCE RECORDS

To: Sandy Spring Bank
Attn: Office of the General Counsel
17801 Georgia Avenue
Olney, MD 20832

YOU ARE HEREBY ORDERED, in the name of the State of Maine Commission on Governmental Ethics and Election Practices, pursuant to 21-A M.R.S. § 1003, to produce the following designated materials on or before April 5, 2013, by sending the materials by first class U.S. mail to Jonathan Wayne, Executive Director, Commission on Governmental Ethics and Election Practices, 135 State House Station, Augusta, Maine 04333:

1. Copies of all account statements, cancelled checks, deposit slips, checks deposited into the account, documents reflecting or relating to wire transfers into or out of the account, signature cards, debit or credit memos and any and all other documents or records regarding Account No. [redacted] in the name of M Five Inc. for the period of June 1, 2011 to January 31, 2012.

2. Copies of all account statements, cancelled checks, deposit slips, checks deposited into the account, documents reflecting or relating to wire transfers into or out of the account, signature cards, debit or credit memos and any and all other documents or records regarding Account No. [redacted] in the name of WWG Technologies LLC for the period of June 1, 2011 to January 31, 2012.

This subpoena is issued on behalf of the Maine Commission on Governmental Ethics and Election Practices, in conjunction with a Commission investigation of the People of Lewiston and Auburn Committee and Green Jobs for ME political action committees, pursuant to 21-A M.R.S. § 1003. The Commission's attorney is Phyllis Gardiner, Assistant Attorney General, Office of the Attorney General, 6 State House Station, Augusta, Maine 04333-0006. She may be contacted at (207) 626-8830.

This subpoena has been served on the entities whose records are being sought by mailing a copy of the subpoena to the registered agents for the account holders.

PLEASE TAKE NOTICE that failure to comply with the commands of this Subpoena shall result in imposition of sanctions as provided by law.

Dated: 3/6/13

WALTER F. MCKEE, Esq., Chair
Maine Commission on Governmental Ethics and Election Practices