



Department of the Secretary of State

Bureau of Corporations, Elections and Commissions

Shenna Bellows
Secretary of State

Julie L. Flynn
Deputy Secretary of State

December 15, 2025

The Honorable Craig Hickman, Senate Chair
The Honorable Laura Supica, House Chair
Members of the Joint Standing Committee on Veterans and Legal Affairs
100 State House Station
Augusta, ME 04333-0100

Dear Senator Hickman, Representative Supica, and Members of the Joint Standing Committee on Veterans and Legal Affairs,

Pursuant to the requirements of Title 21-A §610 I am pleased to provide this report to the Committee regarding the 2025 Referendum Election.

Mainers should be proud that the 2025 Referendum Election was another free, safe and secure Maine election. Yet again, Mainers distinguished our state with strong voter turnout. 492,008 voters (approximately 47.4% of registered voters)¹ cast ballots in this election, more than any other Referendum Election in the last 15 years.

There were few alleged violations of Maine Revised Statutes Title 21-A: Maine's election laws. In accordance with 21-A §610 (2) and (3) those reports were logged and are included in this report.

This report has four parts, following the subsections of 21-A §610 (3):

- A. A summary of the alleged violations of this Title related to the conduct of statewide or federal elections received and logged under subsection 2;
- B. A summary of any post-election audits conducted;
- C. A summary of any recounts conducted, including a description of any discrepancies in vote totals and explanations for discrepancies when available; and
- D. Recommendations for remedying any problems identified in the election process at the state level.

¹ As of November 18, 2025, there were approximately 1,037,786 registered voters in Maine. Municipalities are required to update CVR within 15 business days after the election to add new election day registrations or changes, so the number of registered voters may change slightly when these updates are reported.

Part A:

As seems to be often the case, the most prevalent and complaint-driving issues on Election Day and during the absentee voting period were related to 21-A §682 (political activities) and 21-A §683 (regulated activities at voting place).

- Political Activities in the Voting Place: There were various calls and emails to Department staff asking what apparel, posters, and conversations were appropriate for election clerks, poll watchers, signature gatherers and others present in and around the voting places. For each instance, staff reminded local election workers and voters of these sections and how they interact with everyone's first amendment rights to free speech. Unfortunately, at least one of these incidents did end with a voter in tears, and at least a couple resulted in law enforcement getting involved.
- Petition Gathering Requirements: Related to some of these incidents, the Elections Division also received reports of unmonitored petition sheets for a citizen initiative in voting places. Title 21-A §902 requires that petition circulators "personally witnessed all of the signatures to the petition." Part of the Election Division's review of petitions once submitted is that all requirements for each signature are met in order to be counted towards the number of signatures required for a petition to proceed to legislative review.

There were a few instances of requiring clarification regarding issuance of ballots under Title 21-A with local clerks:

- In one instance, a ballot clerk was asking for identification in order to issue a ballot. The Elections Division clarified current law with the municipal clerk to ensure such actions ceased.
- In another, a clerk inadvertently put up a poster online that referenced photo ID. The Elections Division confirmed that she was aware of current law and that the municipality was not asking for identification in order to issue a ballot and the poster was taken down.
- In another instance, a clerk turned away a voter rather than taking an affidavit as proof of residence and challenging the voter. The Elections Division clarified the correct procedure to ensure that a voter can cast a ballot for the future. Unfortunately, we do not believe that this voter was able to cast a ballot in this election.
- In one municipality, a conflict between a voter and a Warden raised claims of potential Title 21-A violations regarding the voter's ability to have assistance in a voting booth, to use a phone (without audio) to look up a write-in candidate's name, to be free of influence in the voting place, to have a secret ballot, and vote in a local election as well as a Warden's responsibility to ensure that laws protecting voters from influence at a voting place are enforced. Following a review by the Elections Division, the Division will be providing training for the Warden, municipal Clerk and staff.

In a couple of municipalities there were questions about accessibility.

- In one, a voter with visual impairment expressed concerns online about not being able to vote using the accessible voting system (AVS). The Department contacted the town clerk and the voter was able to cast their ballot.
- In another, a voter complained that the town's voting place was not accessible, a similar complaint to how it has been in other odd-year elections. The Elections Division spoke with the Clerk and will be conducting an on-site assessment in the coming months ahead of the next election.

There were also some complaints regarding absentee ballots:

- In one instance, a voter's absentee ballot was mailed to their home address, not where they had requested it be sent while they were out of state temporarily. The Elections Division reminded the clerk to always carefully proof all absentee ballots before issuing. As the voter did not notify the Elections Division of this issue until Election Day, there was no available option to deliver a new ballot to the voter and have it returned by close of polls.
- In another incident in the last week of the absentee voting period, a clerk had rejected a voter's request to pick up an absentee ballot for their domestic partner. The Elections Division reminded the clerk that domestic partners are considered immediate family members who are authorized to request absentee ballots.
- Finally, the Department's Division of Enforcement Services continues to investigate the alleged delivery of 250 Maine absentee ballots to an unnamed individual in Newburgh in her Amazon delivery box, obviously outside the chain of custody. My October letter to the chairs of this committee on this topic is attached.

No reports of threats to local election officials were received by the Elections Division.

Part B:

Members of the Division of Election Audits and Training performed 10 voting place visits on Election Day to Augusta, Manchester, Mt. Vernon, Vienna, Farmington, New Sharon, Rome, Belgrade, Vassalboro and Palermo. They took notes and filled out a checklist for each visit, to make sure they were fairly assessing each location. Their main areas of focus were ADA accessibility and AVS set-up, proper set up of petitioners, tabulator set up and location and display of all required signage.

Division staff observed a strong sense of community across the voting places visited. The clerks that Division staff met were experienced professionals with deep roots in the communities they serve, including some who have been working for decades. Their commitment to democracy was evident in the care they took to maintain accessible and welcoming voting environments. Clerks embraced new election laws and processes as opportunity for continuous growth, and their

intention to improve was unmistakable. Each voting location demonstrated that their priority was ensuring every community member could participate comfortably, confidently, and without barriers. This approach shaped both the atmosphere and the operations of each voting place.

The Division's visits will be used to refine upcoming clerk trainings.

Additionally, the Division of Election Audits and Training conducted pilot risk-limiting audits following the 2024 General Election. To prepare for the pilot audits, staff conducted extensive research on how audits are conducted in other states and consulted with experts at the federal Election Assistance Commission. Additional stakeholders consulted in the planning process included the League of Women Voters and Verified Voting.

The pilot audit was done for only select races where the original vote margin between the winner and runner up did not exceed 4% and had not already been recounted: State Representative Districts 17, 20, 55, 83, and 90, and State Senate District 15.² The pilot audit utilized the ES&S DS850, the high-speed tabulator leased by the Elections Division for scanning large volumes of ballots quickly, and which could imprint each scanned ballot with a unique number.³ The staff then pulled the identified, randomly-selected ballots and two team members audibly announced the vote on the ballot, while also projecting the ballot on a screen for public review. The number of ballots reviewed depended on the margin of victory and the number of votes cast in the election. The first audit resulted in revisions to processes to improve efficiency, in consultation with stakeholders on site. The subsequent five audits were completed successfully, meeting the 5% risk limit threshold and demonstrating the accuracy of the Election Night results.

In conclusion, the Division has successfully developed a risk-limiting audit process that:

- Follows sound and recognized statistical and mathematical principles;
- Works with the current tabulating technology being employed in Maine;
- Allows for the auditing of state legislative races;
- Accounts for Maine's unique geography and municipal-based election system;
- Is based on reasonable criteria so that the races most warranting an audit are selected automatically;
- Is accessible to the public and election officials alike including using technology to provide transparency and security; and
- Is viable to conduct future official audits at a larger scale.

Part C:

No recounts were required or requested to be conducted at the state level for the 2025 Referendum Election.

² SR17: Bucksport, Orland, Penobscot, Verona Island; SR20: Brewer (partial); SR55: Hallowell, Manchester, West Gardiner; SR83: Bridgton, Denmark, Harrison; SR90: Auburn (partial), Minot; SS15: Augusta, Belgrade, China, Mount Vernon, Sidney, Vassalboro

³ The DS200s used by municipalities does not have this capability.

Of the five local recounts that the Department is aware of in Brunswick, Ellsworth, South Berwick, Westbrook and Windham, all local recounts conducted following the November 2025 local elections have confirmed the Election Night results.

Part D:

The lack of reported threats to local election officials may be due to the threat reports being public records – a concern clerks have expressed repeatedly. To help ensure we receive all pertinent threat reports, we recommend amending Title 21-A §675 to either make the reports confidential. Alternatively, we recommend making all personally identifying information on the reports including all names as well as the municipality confidential.

If you have any questions about the above report, I would be pleased to attend a meeting of the Committee to answer them.

Sincerely,

A handwritten signature in blue ink that reads "Shenna Bellows".

Shenna Bellows
Secretary of State



STATE OF MAINE
DEPARTMENT
OF THE
SECRETARY OF STATE

SHENNA BELLows
SECRETARY OF STATE

October 17, 2025

The Honorable Craig Hickman, Senate Chair
Joint Standing Committee on Veterans and Legal Affairs
100 State House Station
Augusta, ME 04333-0100

The Honorable Laura Supica, House Chair
Joint Standing Committee on Veterans and Legal Affairs
100 State House Station
Augusta, ME 04333-0100

Dear Senator Hickman and Representative Supica,

I write to provide you with an update regarding the November 4, 2025 Referendum Election as well as an outline of the checks and balances that have ensured that once again a safe, free and secure election is underway.

Absentee voting is underway in all municipalities statewide. Absentee ballots and absentee ballot envelopes have now been successfully distributed to all towns. Election Day ballots are being delivered to towns on time as scheduled.

In accordance with Title 21-A, ballots are produced and distributed as follows:

- **Printing:** Maine ballots are printed and packaged by J.S. McCarthy in Augusta, a well-known and reputable Maine company contracted by the Elections Division. In accordance with protocol and appropriate chain of custody, the boxes of ballots are sealed and marked clearly as ballots *at the printer* with security tape and markings to ensure that the ballots are handled appropriately at every step in the process, and chain of custody is maintained.¹
- **Shipping:** The packages are shipped directly from the printer using both UPS and the U.S. Postal Service. The packages include tracking information, so that the printer and the Department of Secretary of State Elections Division can track the status of packages of ballots from the

¹ Title 21-A §606 sub§2

printer through shipping to the clerks.² A signature by the appropriate municipal official is required upon receipt by the cities and towns.

- **Confirmation of receipt:** The municipal official is required to sign for the packages and count the ballots received and confirm the number they received to the Department of Secretary of State Elections Division. Every clerk must complete a ballot receipt that they transmit to the Department of Secretary of State Elections Division.³
- **Separate envelopes:** Absentee ballot envelopes are printed by a different printing company and shipped separately, at a separate time, via UPS, in packages with their own individual tracking numbers. This way the envelopes and the ballots cannot be mixed in shipment and are received by each municipality separately.⁴
- **Requesting an absentee ballot:** A registered voter may request an absentee ballot online via the Department of Secretary of State's online absentee ballot request portal, in person at the clerk's office, via a mailed absentee ballot application to the clerk, via phone to the clerk or via a family member.⁵
- **Issuing absentee ballots by the clerks:** The municipal clerk issues absentee ballots to their list of lawfully registered voters who have requested them. The clerk marks the official absentee ballot return envelope with the individual voter's information. The clerk also records the fact that they have mailed the ballot to the voter in the central voter registration system, which links to the online absentee ballot tracking system, so that voters and observers alike may see the status of the absentee ballot.⁶
- **Completion and return of the ballot by the voter:** The ballot must be returned sealed in the official envelope provided, and the envelope must be signed by the voter in order to be counted. Every ballot must be sealed in the official absentee ballot return envelope and signed by the voter in order to be accepted by the clerk.
- **Receipt of completed ballots by municipality:** Upon receipt of an absentee ballot, by mail, in person or via secure drop box, a municipal clerk will examine the signature of the voter on the absentee ballot envelope and on any affidavit and witness certification on the envelope and can compare it to the signature on their voter registration file. If the required information is not present, or the signatures appear not to match – the clerk will make a good faith effort to contact the voter, so that the voter may fix the problem. The clerk must reject any ballot that is not returned in the proper envelope and signed appropriately by the voter. The outcome of the clerk's inspection of the envelope is noted in the tracker, and a voter can see if their ballot has been accepted or rejected. If a voter's ballot is rejected, they would be able to cast a different ballot by

² Title 21-A §606 sub§4

³ Title 21-A §606 sub§3

⁴ Title 21-A §752

⁵ Title 21-A §753-A

⁶ Title 21-A §753-B

8:00 p.m. on Election Day. The clerk does not open the absentee ballot envelope when it is returned. Rather, it is stored securely for later absentee ballot processing.⁷

- **Online absentee ballot tracking:** A voter may track the status of their absentee ballot via the online absentee ballot tracking portal. Additionally, a spreadsheet of all absentee ballot requests is posted regularly on the Department of Secretary of State's website, so that campaigns and political parties may track all absentee ballots statewide.⁸
- **Ballot processing:** Absentee ballots may be processed up to seven days before Election Day, with notice provided to the Secretary of State 30 days before Election Day. Absentee ballot processing is a public process which may be observed by partisan and nonpartisan observers. Observers may inspect the ballot envelopes including voter signatures and absentee ballot applications prior to processing. Absentee ballots are not counted until after 8 p.m. on Election Day, just as all other ballots.⁹

The steps above describe many of the checks and balances established by the Legislature and utilized by Secretaries of State before me that safeguard against potential disruption.

This fall, our systems were tested. On Tuesday, September 30, 250 Maine absentee ballots were alleged to have been delivered to an unnamed individual in Newburgh in her Amazon delivery box, obviously outside the chain of custody.

As soon as we became aware of the situation, I immediately directed my Secretary of State's Division of Enforcement Services to investigate. This division is working closely in collaboration with the Attorney General's office and with the support of the Maine State Police. They have also collaborated with both the Federal Bureau of Investigation and the US Postal Service Investigation team to determine what happened. I have full confidence that law enforcement will determine who is responsible, and any bad actor will be held accountable. We will not stop until we have answers.

Here is what I am able to share of what we know so far:

- On Tuesday, Ellsworth City Hall received two boxes of absentee ballots as planned. One of the boxes did not contain 5 packets of ballots totaling 250 ballots, which were missing. The Ellsworth clerk's office did exactly what we always instruct clerks to do. They notified the Elections Division of the missing ballots, which initiated an investigation.
- Also on Tuesday, the woman in Newburgh allegedly received 5 packets of Maine absentee ballots in an Amazon box. She delivered the ballots to the Newburgh Town Office after 5 p.m., and the ballots were secured by the Newburgh deputy clerk.
- Newburgh Town Office staff called the Elections Division at 8 a.m. promptly on Wednesday to report the ballots received.

⁷ Title 21-A §756

⁸ Title 21-A §765

⁹ Title 21-A §759, §760-A and §760-B

- Detectives from the Division of Enforcement Services went immediately to Newburgh and ballots were secured.
- All Maine absentee ballots have been carefully tracked. The number of ballots missing in Ellsworth corresponds to the number of ballots received in Newburgh. Ellsworth and Newburgh are 40 miles apart.
- Late in the evening of Friday, October 3, our Elections Division was notified by a third-party out of state organization that they believed they were in possession of Maine absentee return envelopes. On Saturday, October 4, I directed law enforcement to expand the law enforcement investigation to include the delivery of absentee ballot return envelopes.

In summary, the process of printing and shipping absentee ballots contains numerous safeguards to protect the chain of custody. Moreover, absentee voting itself has many more safeguards to ensure that a ballot can only be voted if it is associated with a legal registered voter and a valid absentee ballot request. Absentee ballots are tracked by clerks in the central voter registration system and can be tracked by the voters themselves through our online absentee ballot tracking portal. Absentee ballot processing is an open and transparent public process with observers from all sides having the opportunity to observe.

This entire, detailed process was established to ensure safe and secure elections in which all Maine citizens can feel confident. Any ballots that move outside of the chain of custody cannot be used for voting, and only one vote per registered voter will ever be counted.

Please reach out at any time you or members of the Veterans and Legal Affairs Committee have any questions for me and the Department of Secretary of State.

Sincerely,

A handwritten signature in blue ink that reads "Shenna Bellows". The signature is fluid and cursive, with "Shenna" on the top line and "Bellows" on the bottom line.

Shenna Bellows
Secretary of State