



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

**Testimony of Jonathan Wayne, Executive Director of the
Commission on Governmental Ethics and Election Practices
before the Joint Standing Committee on Veterans and Legal Affairs
January 21, 2026**

Senator Hickman, Representative Supica, and distinguished members of the committee: my name is Jonathan Wayne, and I am the Executive Director of the Maine Ethics Commission. Thank you for the opportunity to testify in support of **L.D. 2000**, which is the product of an informal working group convened by the Ethics Commission to see if the deadlines for candidates, PACs, and others could be simplified in the final two weeks before an election. The working group idea was proposed by an attorney who represents candidates and PACs before the Commission when they file campaign finance reports late. The concept resonated with Commission members because these late filers regularly complain that they found the deadlines confusing.

Affected laws. The bill modifies two types of disclosure laws that are sometimes confused:

	Who files?	What do they report?	Purpose of report
24-Hour Reports	Candidates, PACs, party committees, ballot question committees	Large contributions received or expenditures made in the 13 days before an election	The public and election participants should have a way to know about these large transactions before an election.
Independent Expenditure Reports	Mostly PACs and political parties; also individuals occasionally	Costs of ads or mailers advocating for/against candidates	Spender confirms the communications were made independently of candidates. Reports also disclose spending to influence specific candidates.

Process. The working group met publicly twice in April and June 2025. Commissioner Dennis Marble chaired the group. Other participants were State Rep. Ann Matlack, State Rep. Benjamin Hymes, attorneys Joshua Tardy and Lisa Prosienski, former candidate Leo Kenney, and Anna Kellar from Democracy Maine. After the working group agreed on a proposal, the Ethics Commission members considered it and endorsed submitting it to the Legislature.

Some policy considerations received by the working group and the Commission:

- The attached factsheet provides the specifics of the proposal. The overall objective is to simplify the reporting obligations for candidates, PACs, and others during the last 13 or 14 days before an election when candidates and party activists are at their busiest trying to communicate with voters.
- In the last two weeks before an election, LD 2000 would provide candidates and committees that must file a 24-Hour Report one additional day of breathing room to file the report. The report would be due within 48 hours after receiving a large contribution or making a large expenditure, instead of the current 24 hours.
- This change would return the law back to 2004, when the Legislature changed the 48-hour deadline to 24 hours to promote the prompt disclosure of last-minute campaign activity that would affect matching funds paid to Maine Clean Election Act candidates to keep them on an even playing field. P.L. 2003, Chapter 628. (Matching funds are no longer part of the Maine Clean Election Act program.)
- LD 2000 as written would also provide PACs, parties and others filing Independent Expenditure reports one additional day to file the report within the last 13 days before an election. Please note the Commission ran out of time to fully resolve this deadline as it relates to the last six days before the election (see note at the end of the factsheet).
- LD 2000 would increase the transaction amounts that require 24-Hour and Independent Expenditure reports. In other words, the threshold amount for what is considered a “large” transaction that must be disclosed before the election would be increased.
- Our research indicates that the \$1,000 spending threshold that would require candidates and referendum groups to file a 24-Hour Report was the same in 1983 as it is today. That threshold may be overdue for an increase. (At that time, the report was due in 48 hours.)
- The working group concluded that the threshold amounts requiring 24-Hour Reports by candidates could vary depending on which office the candidate is seeking.

The bill has been written as emergency legislation in case the Legislature would like it to take effect in this year’s primary and general elections. The Commission sees no problem administering the proposed requirements in 2026. Thank you for your consideration of this testimony.

LD 2000 - Ethics Working Group Proposal

1. Higher Thresholds that would trigger 24-Hour Reports during the last 13 Days before an Election

	Current Threshold	Working Group Proposal
PACs and ballot question committees		
Receiving a contribution	\$5,000 or more	\$10,000 or more
Making an expenditure or incurring an unpaid debt	\$1,000 or more	\$2,500 or more
Party committees (state and local)		
Receiving a contribution	\$5,000 or more	\$10,000 or more
Making an expenditure or incurring an unpaid debt	\$1,000 or more	\$2,500 or more
Candidates (gubernatorial, legislative, county, and municipal)		
Receiving a contribution (note: due to contribution limits, some contributions in these ranges could be made only by the candidate or their spouse/domestic partner)	\$1,000 or more	\$10,000 Gov \$5,000 Senate \$2,500 County \$2,000 House
Making an expenditure or incurring an unpaid debt	\$1,000 or more	\$10,000 Gov \$5,000 Senate \$2,500 County \$2,000 House

24-Hour Report proposals (1 & 2) would affect candidates, PACs, party committees, ballot question committees

2. The 24-Hour Report Deadline would be Extended to within 48 Hours of the Transaction

3. Higher Threshold that would trigger an Independent Expenditure Report

Now, a PAC or party must file an IE report if the cost of an ad or mailer exceeds \$250 per candidate. The working group proposes to increase the threshold to \$1,000 per candidate.

4. Extended Deadline to File an Independent Expenditure Report in Final 13 Days

	Current deadline in rule	LD 2000 as Written*
Through the 61 st day before election	60 th day before election	60 th day before election
60 th - 14 th day before election	within 2 calendar days of expenditure	within 48 hours of expenditure
13 th - 1 st day before election	within 1 calendar day of expenditure	within 48 hours of expenditure

Independent Expenditure Report proposals (3 & 4) would mostly affect PACs and party committees, but would occasionally affect others making IEs

**Note concerning last 6 days before an election:* Members at the working group's second meeting agreed to propose that IE reports would be due within 48 hours of the expenditure during the entire 60 days before the election. Two members who were unable to participate in that meeting had previously expressed support for keeping the IE deadline at 24 hours during the last six days before the election. The working group ran out of time to reach 100% consensus on this issue and flags it for further consideration by the VLA Committee.