



January 16, 2026

RE: LD1383, Maine State Divestment from Genocide & Human Rights Abuses

Dear Maine State & Local Government Committee,

The American Friends Committee (AFSC) is a Quaker organization and Nobel Peace Prize laureate, which has been working for more than 100 years for a just, peaceful, and sustainable world free of violence, inequality, and oppression. Our Action Center for Corporate Accountability conducts research on corporate involvement in state violence and provides support for socially responsible investing, including generating divestment/exclusion lists for investors based on different criteria.

We have compiled a list of corporations that are relevant to U.S. investors and that consistently, knowingly, and directly enable or facilitate genocide, apartheid, ethnic cleansing, and human rights violations as part of U.S. immigration enforcement.

Specific to Maine's proposed legislation, LD 1383, we analyzed the MainePERS portfolio and found 29 investments that correspond to the above criteria, with a combined value of \$173 million, which represents 0.82% of the total MainePERS assets under management (AUM). The attached spreadsheet includes this analysis, showing the list of flagged companies, the quantity of shares held by MainePERS and their market value, as reported in the latest public disclosure from September 30, 2025, and their percentage out of MainePERS' total AUM.

For more than a decade and a half, we have supported dozens of institutions, including U.S. cities, counties, and states, with technical assistance in implementing negative investment screens. We applaud the State of Maine for being a leader in socially responsible investing. Should state offices benefit from more information or further collaboration, our staff are available for support.

Sincerely,

Noam Perry, PhD  
Strategic Research Coordinator  
Action Center for Corporate Accountability  
American Friends Service Committee

Security ID	Security Description	Quantity	Market Value + Accrued	% of Total MPERS AUM
01973R101	ALLISON TRANSMISSION HOLDINGS INC COMMON STOCK USD	5,046.00	\$428,304.48	0.0020%
05464C101	AXON ENTERPRISE INC COMMON STOCK USD 0.00001	4,784.00	\$3,433,189.76	0.0163%
097023105	BOEING CO/THE COMMON STOCK USD 5	46,476.00	\$10,030,915.08	0.0475%
149123101	CATERPILLAR INC COMMON STOCK USD 1	29,696.00	\$14,169,446.40	0.0671%
166764100	CHEVRON CORP COMMON STOCK USD 0.75	123,185.00	\$19,129,398.65	0.0906%
369604301	GE AEROSPACE	67,442.00	\$20,312,181.56	0.0962%
369550108	GENERAL DYNAMICS CORP COMMON STOCK USD 1	16,207.00	\$5,526,587.00	0.0262%
438516106	HONEYWELL INTERNATIONAL INC COMMON STOCK USD 1	40,832.00	\$8,595,136.00	0.0407%
502431109	L3HARRIS TECHNOLOGIES INC COMMON STOCK USD 1	11,977.00	\$3,657,895.57	0.0173%
52661A108	LEONARDO DRS INC COMMON STOCK USD 0.01	5,046.00	\$229,088.40	0.0011%
539830109	LOCKHEED MARTIN CORP COMMON STOCK USD 1	13,394.00	\$6,686,418.74	0.0317%
620076307	MOTOROLA SOLUTIONS INC COMMON STOCK USD 0.01	10,686.00	\$4,898,747.90	0.0232%
666807102	NORTHROP GRUMMAN CORP COMMON STOCK USD 1	8,697.00	\$5,299,256.04	0.0251%
688239201	OSHKOSH CORP COMMON STOCK USD 0.01	4,191.00	\$543,572.70	0.0026%
69608A108	PALANTIR TECHNOLOGIES INC COMMON STOCK USD 0.001	140,091.00	\$25,555,400.22	0.1210%
741623102	PRIMO BRANDS CORP COMMON STOCK USD 0.01	17,134.00	\$378,661.40	0.0018%
75513E101	RTX CORP	85,805.00	\$14,357,750.65	0.0680%
883203101	TEXTRON INC COMMON STOCK USD 0.125	11,057.00	\$934,446.11	0.0044%
91913Y100	VALERO ENERGY CORP COMMON STOCK USD 0.01	20,019.00	\$3,408,434.94	0.0161%
980745103	WOODWARD INC COMMON STOCK USD 0.001455	3,887.00	\$982,283.77	0.0047%
03852U106	ARAMARK COMMON STOCK USD 0.01	17,613.00	\$676,339.20	0.0032%
099502106	BOOZ ALLEN HAMILTON HOLDING CORP COMMON STOCK USD	7,755.00	\$775,112.25	0.0037%
14316J108	CARLYLE GROUP INC/THE COMMON STOCK USD 1	16,277.00	\$1,020,567.90	0.0048%
174610105	CITIZENS FINANCIAL GROUP INC COMMON STOCK USD 0.01	27,598.00	\$1,467,109.68	0.0069%
459200101	INTERNATIONAL BUSINESS MACHINES CORPORATION	59,671.00	\$16,836,769.36	0.0797%
48242W106	KBR INC COMMON STOCK USD 0.001	8,918.00	\$423,203.69	0.0020%
7591EP100	REGIONS FINANCIAL CORP COMMON STOCK USD 0.01	57,036.00	\$1,519,927.66	0.0072%
808625107	SCIENCE APPLICATIONS INTERNATIONAL CORP COMMON	3,056.00	\$303,674.72	0.0014%
879360105	TELEDYNE TECHNOLOGIES INC COMMON STOCK USD 0.01	2,956.00	\$1,732,334.24	0.0082%
<b>Total</b>			<b>\$173,312,154.07</b>	<b>0.8207%</b>