

City of Portland

Clean Elections Review Board-December 3, 2024



Tuesday, December 3, 2024 at 2:00 PM City Hall-
Room 24-Kippy Room (Basement Floor)
389 Congress Street, Portland, ME

1. Call to Order/Roll Call
2. Appeal
 - a. a. Karen Snyder - Appeal Hearing
Karen Snyder is appealing the decision of the City Clerks Office to allow Robert Todd Morse to become a Clean Elections Candidate.
3. Set Next Meeting Date if Needed
4. Adjournment

City of Portland | City Clerk's Office

Ashley Rand, *City Clerk*



To: Clean Elections Review Board

From: Ashley Rand, City Clerk

Date: November 18, 2024

Re: Karen Snyder Appeal Hearing

On September 24, 2024 Karen Snyder submitted a Clean Elections Inquiry email expressing concerns regarding District 1 City Council Candidate, Robert Todd Morse. Karen Snyder questioned how a candidate could become certified as a Clean Election candidate when they are the registered agent and President of the Urbanist Coalition Portland (UCP), a 501 c (4).

My office reviewed Snyder's complaint and consulted with the Maine Ethics Commission.

After consulting with the Maine Ethics Commission and reviewing Robert's campaign finance reports, it was determined that there had been no instances where the Urban Coalition Portland supported Robert and their City Council campaign financially. The Maine Ethics Commission said as long as this organization is not directly using funds to support Robert Morse as a candidate then there is no violation of the Clean Elections Ordinance, and is allowed to be a Clean Elections Candidate while being the President of the organization.

The Urbanist Coalition of Portland was not an active PAC or BCQ with us for this Election.

On October 4, 2024 our office responded to Snyder's request letting her know that we have determined that candidate Robert Todd Morse was in no violation of the Clean Elections Ordinance.

On October 8, 2024 Snyder responded back to our office stating that they still believe this is a violation and wanted it to be addressed.

On October 11, 2024 our office responded to Snyder letting them know our office had nothing further to add to the investigation and could submit a formal appeal request to the Clean Elections review board.

On October 16, 2024 Snyder requested via email that this appeal be reviewed and addressed by the Clean Elections Board.

Thank You,
Ashley Rand
City Clerk

Fwd: Fw: November 2024 Elections Clean Election Inquiry

Ashley Rand <arand@portlandmaine.gov>

Dear Ms. Rand,

I am following up to last week's email sent regarding below inquiry.

Regards,
Karen Snyder
D1 Constituent

----- Forwarded Message -----

From: Karen Snyder <karsny@yahoo.com>
To: cityclerk@portlandmaine.gov <cityclerk@portlandmaine.gov>
Cc: ethics@maine.gov <ethics@maine.gov>
Sent: Tuesday, September 24, 2024 at 08:52:56 AM EDT
Subject: November 2024 Elections Clean Election Inquiry

Dear Ms. Rand,

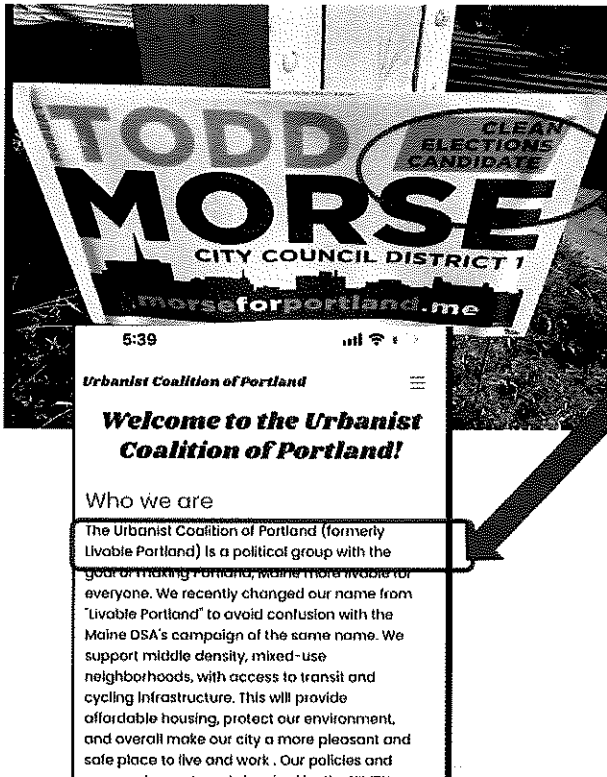
As the City Clerk for City of Portland, ME, I am inquiring about a clean election candidate for the City of Portland, ME November 2024 elections.

How can D1 City Councilor Candidate, Todd Morse, take clean election money from the City of Portland when he is the registered agent and has publicly acknowledged his role of founder and president of the Urbanist Coalition Portland (UCP) that I believe is registered as a 501 c(4) which is a political non-profit that can be considered a PAC for dark money?

See evidence below.

I would appreciate your input and further steps of inquiry.

Regards,
Karen Snyder
D1 Constituent



Subscriber activity report

This record contains information from the CEC database and is accurate as of: Mon Sep 23 2024 16:06:26. Please print or save for your records.

Legal Name	Charter Number	Filing Type	Status
URBANIST COALITION OF PORTLAND	202400584D	NON-PROFIT CORPORATION (UNDER TITLE 13-B)	GOOD STANDING

Filing Date	Expiration Date	Jurisdiction
08/14/2023	N/A	MAINE

Other Names	(A=Assumed ; F=Former)
NONE	

Principal Home Office Address

Physical	Mailing
10 HAMMOND STREET APT 103 PORTLAND, ME 04101	10 HAMMOND STREET APT 103 PORTLAND, ME 04101

Clerk/Registered Agent

Physical	Mailing
ROBERT TODD MORSE 10 HAMMOND STREET PORTLAND, ME 04101	ROBERT TODD MORSE 10 HAMMOND STREET PORTLAND, ME 04101

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Danielle P. West
City Manager
City of Portland
389 Congress Street
Portland, Maine 04101
(207) 874.8689
dwest@portlandmaine.gov



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Ashley Rand
City Clerk
City of Portland
389 Congress Street
Portland, ME 04101
(P) 874-8614
(F) 874-8612



Fwd: Fw: November 2024 Elections Clean Election Inquiry

Ashley Rand <arand@portlandmaine.gov>

Fri, Oct 4, 2024 at 11:34 AM

Cc: Mark Dion <mdion@portlandmaine.gov>, Danielle West <dwest@portlandmaine.gov>, Michael Goldman <mig@portlandmaine.gov>, ethics@maine.gov, Paige Marcello <pmarcello@portlandmaine.gov>

Hi Karen-

We looked into this and reached out to the Maine Ethics Commission on this. The Maine Ethics Commission said as long as this organization is not directly using funds to support Robert Morse as a candidate then there is no violation of the Clean Elections Ordinance, and is allowed to be a Clean Elections Candidate.

There have been no instances where our office has seen this organization purchase items to support Robert.

You can also look at Roberts's most recent Campaign Finance Report which was submitted last week:

<https://content.civicplus.com/api/assets/83c24cfd-0d2d-4594-a29e-21362ad4c8f2?cache=1800>

Furthermore, The Urbanist Coalition of Portland is not an active PAC or BCQ with us for this Election.

Please let me know if you have any other questions

Thank you,
Ashley
[Quoted text hidden]

Ashley Rand

City Clerk

City of Portland
389 Congress Street
Portland, ME 04101
(P) 874-8614
(F) 874-8612



Formal appeal to the Clean Elections Board.

Gordon, Erin <Erin.Gordon@maine.gov>
To: arand <arand@portlandmaine.gov>
Cc: Paige Marcello <pmarcello@portlandmaine.gov>

Thu, Oct 17, 2024 at 8:51 AM

Good morning,

I conferred with our Executive Director, Jonathan Wayne, and we do not have any precedents of a candidate associated with a nonprofit being accused of accepting improper contributions. We have done a preliminary review of the nonprofit's website, and, based on the information provided, do not see any basis for bringing the issue to the Commission for further investigation of a potential violation of Portland clean election requirements.

Let me know if I can help further!

Erin Gordon

Candidate Registrar

From: Ashley Rand <arand@portlandmaine.gov>
Sent: Wednesday, October 16, 2024 4:37 PM
To: Gordon, Erin <Erin.Gordon@maine.gov>
Cc: Paige Marcello <pmarcello@portlandmaine.gov>
Subject: Fwd: Formal appeal to the Clean Elections Board.

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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[Redacted signature]

Notice: Under Maine law, documents - including e-mails - in the possession of public officials or city employees about government business may be classified as public records. There are very few exceptions. As a result, please be advised that what is written in an e-mail could be released to the public and/or the media if requested.

Fwd: Fw: November 2024 Elections Clean Election Inquiry

Karen Snyder <karsny@yahoo.com>

Tue, Oct 8, 2024 at 8:42 AM

To: Ashley Rand <arand@portlandmaine.gov>

Cc: Mark Dion <mdion@portlandmaine.gov>, Danielle West <dwest@portlandmaine.gov>, Paige Marcello <pmarcello@portlandmaine.gov>, "ethics@maine.gov" <ethics@maine.gov>, Michael Goldman <mig@portlandmaine.gov>

Thank for your response.

However, there is still one unanswered question.

How would the City of Portland know how UCP is using its resources? Non-profits don't report their spending to the city or who is donating to UCP.

The non-profit UCP appear to be using their funds INDIRECTLY to support Robert Todd Morse to promote this it's website and political agendas while Todd Morse refers/promotes UCP in his candidacy, election website, and his own aligned political agendas.

These actions though indirectly coordinated effort seem to go against what clean elections are about which was supposed to be about transparency. As such, these kinds of actions need to be clarified and addressed by the Clean Elections ordinance.

Consequently, UCP should at least be filing a PAC/BCQ report for the 2024 elections.

Regards,

Karen Snyder
D1 Resident

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Fwd: Fw: November 2024 Elections Clean Election Inquiry

Ashley Rand <arand@portlandmaine.gov>

Fri, Oct 11, 2024 at 9:10 AM

To: Karen Snyder <karsny@yahoo.com>

Cc: Michael Goldman <mig@portlandmaine.gov>, Paige Marcello <pmarcello@portlandmaine.gov>

Hi Karen-

At this time our office has nothing future to add to the investigation. We have submitted our determination to you via email.

If you wish to pursue this matter further, you can file a formal appeal to the Clean Elections Board.

That appeal will need to be in writing and filed in this office with any evidence you have for your case. Once a formal appeal is filed, we will work with the Board to get an appeal hearing scheduled at a future date where you will be asked to attend and speak on your appeal.

Attached is the Clean Elections Review Board Rules & Procedures.

Here is the link to Chapter 9, which has the Clean Elections Ordinance, (starting at 9-61)

<https://content.civicplus.com/api/assets/06f36b02-d951-4a1e-a3ba-8e9d8cd6d0d4?cache=1800>

Thank You!

Ashley Rand

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CITY OF PORTLAND CLEAN ELECTIONS REVIEW BOARD RULES AND PROCEDURES-Adopted 5-9-2024.pdf
98K

Formal appeal to the Clean Elections Board.

Karen Snyder <karsny@yahoo.com>

Wed, Oct 16, 2024 at 4:02 PM

To: Ashley Rand <arand@portlandmaine.gov>

Cc: Michael Goldman <mig@portlandmaine.gov>, Paige Marcello <pmarcello@portlandmaine.gov>

This is a formal appeal to the Clean Elections Board for the following reason.

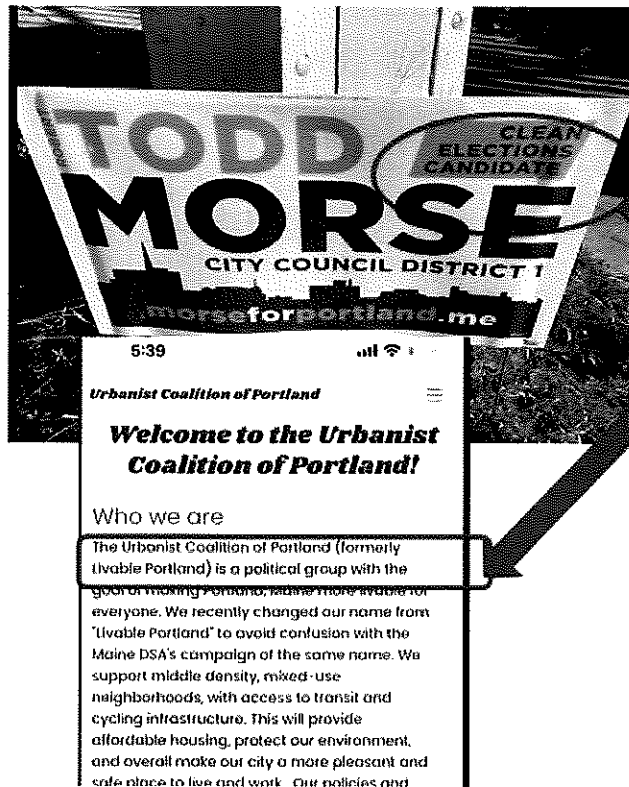
Per City of Portland Code of Ordinance Section 9-63c (3) states the following:

(3) Seed Money Restrictions. The following restrictions shall apply to Seed Money Contributions: i. All goods and services received by a Participating Candidate prior to certification as a Certified Candidate must be paid for with Seed Money Contributions, except for goods and services that are excluded from the definition of Contribution in in 21-A M.R.S. § 1012(2)(B). It is a violation of this Article for a Certified Candidate to use Fund revenues received after certification to pay for goods and services received prior to certification.

Therefore this leads to the question as to how D1 City Councilor Candidate, Todd Morse is able to qualify for clean elections from the City of Portland when he is the registered agent and has publicly acknowledged his role of founder and president of the Urbanist Coalition Portland (UCP) that is registered as a 501 c(4) which is a political non-profit that has used their goods and services to develop websites and policy proposals prior to certification which Todd Morse is now promoting and leveraging in his candidacy?

This seems to be "double dipping" of a candidate regarding how they are being supported and/or funded which is by using clean election funds but also leveraging the goods and services for undisclosed funds donated to the political lobbying non-profit UCP. How would the City of Portland know how UCP is using its resources? Political Non-profits don't report their spending to the city or who is donating to UCP.

I would appreciate this to be reviewed and addressed by the Clean Elections Board.



MAINE

Department of the Secretary of State

Bureau of Corporations, Elections and Commissions

Corporate Name Search

Information Summary

Subscriber activity report

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Filing Date	Expiration Date	Jurisdiction
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Other Names: (A=Assumed ; F=Former)

NONE

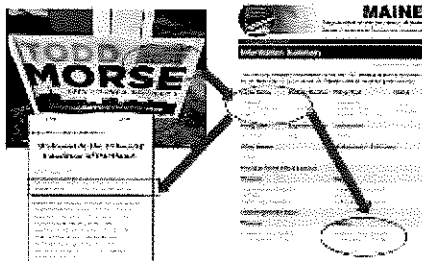
Principal Home Office Address

Physical	Mailing
10 HAMMOND STREET APT 103 PORTLAND, ME 04101	10 HAMMOND STREET APT 103 PORTLAND, ME 04101

Clerk/Registered Agent

Physical	Mailing
ROBERT TODD MORSE 10 HAMMOND STREET PORTLAND, ME 04101	ROBERT TODD MORSE 10 HAMMOND STREET PORTLAND, ME 04101

Regards,
Karen Snyder
D1 Resident



ToddMorseCleanElectionInquiry_20240924.jpg
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