



April 18, 2023

Portland City Clerk Ashley Rand
Office of the Clerk, Portland City Hall
Via email: arand@portlandmaine.gov

Madame Clerk,

In reviewing the finance reports of the [Committee to Improve Rent Control](#) [CIRC] and [Enough is Enough](#) [EIE], we noticed a number of issues we hope you will investigate further and/or refer immediately to the Maine Ethics commission for investigation and possible action, as per 21-A MRS sec 1053–A.

First and foremost, there is a mysterious \$10,000 “refund” on EIE’s report to the parent corporation of the CIRC, the Rental Housing Alliance [RHA], which may have actually come from a third donor.

As you have likely seen, EIE lists a single donation on their report. It is for \$10,000, occurs on Jan 24, and comes from Northern Light Health (Mercy Hospital’s corporate parent). Three weeks later, on Feb 16, a \$10,000 “refund” is made to the Rental Housing Alliance with a note that the purpose of this refund is to “oppose” “ballot questions.” (It should be noted, that nowhere is there any documentation from previous EIE reports that the RHA or their corporate entity, Southern Maine Landlords Association, lent EIE money.) Three days prior to that “refund,” on February 13, the Rental Housing Alliance gave its BQC, CIRC, \$10,000. Then, [in the Portland Press Herald on April 12](#), Brit Vitalius, Chair of CIRC, admits to reporter Rachel Ohm that he asked for “a contribution to their June referendum campaign prior to the refund” being made to RHA.

It appears three things are possible in regard to this issue:

- 1) Northern Light Maine is trying to shield its support of the referenda by giving money to EIE that it directed be given to RHA, which RHA in turn donated to CIRC. This, of course, would be illegal.
- 2) EIE is trying to shield its support of this referendum by giving a requested donation to CIRC as a “refund” to RHA, which in turn gave that donation to CIRC. Also of course, illegal. (It should be noted that the “refund” by EIE is designated to “oppose ballot questions,” even though RHA has no efforts in opposition to any referendum. Additionally, according to public reporting by Rachel Ohm in the [Portland Press Herald](#), RHA requested a donation, not a “refund.” Both of these factors point to EIE trying to hide their support.)

- 3) EIE, when asked for a donation by CIRC, went to some of its larger donors and asked for a donation they could then funnel to RHA, which RHA would then redirect to CIRC. Again, also illegal.

Second, out of 30 individual donors to CIRC, only one includes the required “occupation and employer” data. While “information requested” is an allowable descriptor, using it for 97% of your entries is either a snub to the expectation of public transparency or it means CIRC did not actually ask (our experience shows that almost all donors respond with adequate information when told it is required by law). We understand CIRC’s desire to hide the occupations and employers of most of their donors (most of whom are likely landlords, developers, and/or property managers), but we request that you ask for documentation to prove that they did actually request the required information and/or that they did not conceal that information from donors if/when it was received. Honestly, it is hard to imagine that Brit Vitalius does not know the occupations of many of these donors, since they are likely members of the organization he heads.

Third, on the CIRC report, they claimed on their summary page that they raised \$48,437.33. But they reported only \$46,437.33 in donations. We ask that you look into whether there are \$2,000 worth of contributions missing from the report, or if RHA is claiming they raised more money than they actually raised.

Fourth, because the amount raised by the CIRC is now in question, we would ask that you confirm their cash on hand declaration. If they raised \$2,000 less, there is no way they can have \$3,817.93, as they claim, unless the expenses reported are also inaccurate. A simple request to see their bank statements should get to the bottom of this issue.

Thank you for your attention to all these matters. As stated above, we hope you will immediately investigate each, or if your investigatory resources are insufficient, refer these substantial potential violations to the Maine Ethics Commission for full investigation. Transparency around who is funding local campaigns is paramount to democracy and the public must have complete faith that CIRC and EIE (and their parent companies) are being fully transparent and accurate in their reporting.

Should you or the Ethics Commission find that the problems listed above have merit, we hope appropriate steps will be taken to have the reports fully amended, and penalties imposed for any violations discovered.

We look forward to your response and remain ready to answer any questions. We will obviously share any additional evidence we uncover, should it arise.

In solidarity,

DSA for a Livable Portland