

October 9, 2019

The Honorable Charles P. Rettig Commissioner Internal Revenue Service 1500 Pennsylvania Ave. NW Washington, D.C. 20229

Re: Complaint Concerning Maine Momentum (Form 13909 Addendum)

Dear Commissioner Rettig:

The Foundation for Accountability and Civic Trust (FACT) is a nonprofit organization dedicated to promoting accountability, ethics, and transparency in government and civic arenas. We achieve this mission by hanging a lantern over public officials who put their own interest over the interests of the public good.

We write today to notify you of a consistent pattern of activities and public admissions by Maine Momentum that indicate the group is operating for the substantial private benefit of the Maine Democratic Party and Maine's 2020 Democratic candidates for Senate instead of serving the public interest by promoting the social welfare of the general public as required by tax law requires.

Maine Momentum purports to operate as a social welfare organization exempt from federal tax under Internal Revenue Code section 501(c)(4). Nevertheless, by the group's own admission earlier this year, its "sole focus" is on "advocacy and accountability and public education" about Senator Susan Collins, a candidate for reelection to the U.S. Senate in 2020, and her record in the U.S. Senate as part of a "multipronged strategy" by national Democratic political operatives to defeat Senator Collins in 2020. These statements accurately describe the group's activities in the intervening months, which have focused nearly exclusively on attacking Senator Collins and have not referenced any other officeholder. In light of the group's laser focus on Senator Collins by operatives long associated with the Democratic Party in a time period that coincides almost perfectly with the ramp up of the 2020 Senate campaign in Maine, it is obvious that the group exists to advance the Democratic Party's interests and should not be permitted to operate as a

¹ Kevin Miller, "New group presses Collins on key issues but says it won't tell you how to vote," *Portland Press Herald*, July 1, 2019, available here: https://www.pressherald.com/2019/07/01/new-group-takes-aim-at-collins/; Steve Mistler, "New Group Uses Exploited Advocacy Rules to 'Educate' Mainers About Sen. Collins," *Maine Public Radio*, July 3, 2019, available here: https://www.mainepublic.org/post/new-group-uses-exploited-advocacy-rules-educate-mainers-about-sen-collins; *see also*, David Sharp and Brian Slodysko, "Outside money flows into race for Susan Collins' Senate seat," *Associated Press*, Aug. 21, 2019, available here: https://www.apnews.com/7713181383174f6a926041fa6a611242.

social welfare organization that may accept unlimited corporate contributions and shield its donors from public disclosure.

Therefore, for the reasons set forth in greater detail below, we respectfully request that the IRS investigate whether Maine Momentum has violated federal law governing 501(c)(4) social welfare organizations and is in fact operating for the private benefit of the Maine Democratic Party and Maine's Democratic candidates for the U.S. Senate in 2020, and if so, revoke the organization's status as a tax-exempt 501(c)(4) organization.

Facts

Membership

Maine Momentum incorporated as a Maine non-profit corporation on April 9, 2019.² The group's leadership³ has strong ties to the Maine Democratic Party and to the front runner for the Democratic nomination for U.S. Senate, Sara Gideon.

- Executive Director Willy Ritch is a former spokesperson for Democratic Congresswoman Chellie Pingree.⁴
- Chris Glynn, the group's Communications Director, is a former spokesperson for the Maine Democratic Party. Until June 2019, Glynn worked for Gideon in the Maine Legislature as her Speaker's office communications director. Approximately one week later, he joined Maine Momentum as Communications Director. 5 Glynn has also worked for the Maine Democratic Party and as a field organizer for Hillary Clinton's 2016 presidential campaign.⁶
- Lily Herrmann is the group's Community Organizing & Outreach Director. Herrmann previously worked for the Maine Democratic Party and interned for a Democratic member of Congress from New York. She has served as co-President of the Colby College Democrats and as chair of the Waterville Democratic Committee.⁷ Hermann's LinkedIn profile also touts her participation in a candidate training and preparation program by Emerge Maine, a group that was forced to convert to a 527 political organization after the IRS denied its tax exemption in 2011 because its activities violated the private benefit rules for 501(c)(4) organizations by benefiting only the Democratic Party.⁸ Indeed, this group also has strong ties to Sara Gideon, the current Democratic

² See Exhibit A.

³ The group's leadership is either working for Maine Momentum or Maine Momentum's campaign, 16 Counties Coalition. See mainemomentum.org ("Sign up to be part of our newest campaign, the 16 Counties Coalition.").

⁴ Mistler, supra note 1; Cameron Cawthorne, "Maine Dark Money Group Behind False Ad Tied to Sara Gideon," Washington Free Beacon, Aug. 20, 2019, available here: https://freebeacon.com/politics/maine-dark-money-groupbehind-false-ad-tied-to-sara-gideon/.

⁵ Cawthorne, supra note 4. See Facebook Post of Chris Glynn showing his last day as Director of Communications for the Office of the Speaker on June 21, 2019 and his first day as Director of Communications for the 16 Counties Coalition on July 1, 2019 available here: https://www.facebook.com/chrisglynn207.

⁶ Sharp and Slodysko, *supra* note 1; https://www.linkedin.com/in/christopher-g-966a7263/.

⁷ https://www.linkedin.com/in/lilyherrmann/.

⁸ Stephanie Strom, "Three Groups Denied Break by I.R.S. Are Named," New York Times, July 20, 2011, available here: https://www.nytimes.com/2011/07/21/business/advocacy-groups-denied-tax-exempt-status-are-named.html.

frontrunner in the 2020 U.S. Senate race. Gideon is an alumna of the group's 2012 program and has credited the group for her start in politics. The organization honored Gideon as its "Woman of the Year" in June and the group's founder hosted a San Francisco fundraiser for Gideon's Senate campaign in August. 11

• Olin Jenner, Director of Research for the 16 Counties Coalition, previously worked at Mach3Media, a key vendor to the Maine Democratic Party and other Democratic candidates. 12

Timing

The group, which formed as a Maine non-profit corporation in April 2019, launched its public presence within days of Sara Gideon declaring her candidacy for the U.S. Senate. Gideon filed a Statement of Candidacy to run as a Democratic candidate for the U.S. Senate on June 24, 2019. One week later, Maine Momentum launched the 16 Counties Coalition, a project to "pressure Republican Sen. Susan Collins on issues likely to resonate with moderate voters." Upon its launch, its Executive Director, Willy Ritch, told the media that the group would be using "advertising, social media, and community organizing to encourage Collins to 'start putting families and working Mainers ahead of her special interest supporters." Indeed, Ritch admitted that the group's singular mission would be to attack Senator Susan Collins, her policy positions and her campaign contributors. He said, "Our sole focus will be about advocacy and accountability and public education. And there are plenty of things that have happened with Senator Collins in the past several years where people are saying Senator Collins needs to start listening."

The group's website similarly describes its mission in partisan terms. It states that:

16 Counties Coalition is a coalition of advocates committed to elevating the voices of working Mainers over wealthy special interest groups. Mainers deserve elected officials who will fight for them in Congress, not mouthpieces for big corporations, drug companies, and corporate PACs. Our grassroots coalition is made up of concerned Maine residents living with the consequences of the **Republican-controlled Senate's policies**, which reward wealthy donors at our expense.¹⁷

By both its website and admissions by its Executive Director in the press, Maine Momentum and it's campaign, the 16 Counties Coalition, has made its partisan objectives to advance the interests

⁹ Speech of Sara Gideon, posted here: https://www.facebook.com/watch/?v=683525782077304.

¹⁰ Press Release of Emerge Maine available here: https://me.emergeamerica.org/514-2/.

¹¹ Susan Crabtree, "'Dark Money'-Fueled Ads Heat Up Maine Senate Battle," *Real Clear Politics*, Sept. 10, 2019, available here: https://www.realclearpolitics.com/articles/2019/09/10/dark money-fueled ads heat up maine senate battle 141211.html.

¹² https://www.linkedin.com/in/olin-jenner-74781410b/; https://www.16countiescoalition.org/team.

¹³ Sara Gideon FEC Form 2, Statement of Candidacy, available here: https://docquery.fec.gov/cgibin/forms/S0ME00111/1335581/.

¹⁴ Miller, *supra* note 1.

¹⁵ *Id*.

¹⁶ *Id*.

¹⁷ "About Us" Section of 16 Counties Coalition Website available here: https://www.16countiescoalition.org/about (emphasis added).

of the Maine Democratic Party clear. The group continues to seek Democratic political operatives to achieve these stated aims. After former Democratic presidential candidate Kirsten Gillibrand dropped out of the presidential race, Chris Glynn expressed keen interest in talking with her former campaign staffers "about a great digital job in Maine related to Senator Collins." Glynn's comments make two points clear: 1) the group's focus is entirely "related to Susan Collins" and 2) the group believes that the most effective messengers for this mission are Democratic campaign operatives.

Activities

In addition to financing the 16 Counties Coalition, Maine Momentum has made significant expenditures for television and digital advertising attacking Senator Susan Collins. According to public filings, the group has reserved more than \$1,000,000 in air time in Maine television markets between now and January 5, 2020.¹⁹ Of this buy, more than \$450,000 has been devoted to airing four television advertisements in Maine, attacking Senator Collins for her vote on the 2017 tax bill. The first ad, which the Washington Post's fact checker said merits "three Pinocchios,"20 misleads Maine viewers by stating that Senator Collins' vote on the 2017 tax bill jeopardized Medicare and Social Security.²¹ The second ad, "Three Generations," also attacked Senator Collins' support for the 2017 tax bill and featured a testimonial by a lobsterman who claims he previously "voted for" Senator Collins but now feels that "it's not fair" that Senator Collins has "taken all this big corporate money and voted to give them \$100 billion in tax breaks."22 A digital ad features a testimonial by a woman named Patricia who says "Susan Collins needs to stand up for Mainers, not her corporate donors." The advertisement urges viewers to "Call Susan Collins. 202-335-3371. Tell her to choose Mainers over her donors." 23 Other posts promote public events aimed at attacking Susan Collins including two town hall meetings billed as a "Town Hall With or Without Senator Collins."24 The most recent ad features a woman who criticizes Senator Collins' vote for the 2017 tax bill, noting, "We've got to tell Susan Collins she's got to put Mainers in front of donors."25

Maine Momentum has also paid for at least 78 separate digital advertisements disseminated via Facebook under the branding of the 16 Counties Coalition.²⁶ Each of the digital ads attacks

¹⁸ Exhibit B

¹⁹ See Sharp and Slodysko, *supra* note 1 (noting that "Maine Momentum, the group running the new anti-Collins ad, plans to spend at least \$716,000 on ads geared toward the Senate race from now until the end of December, records show."); *see also* data compiled from Maine television station political files.

²⁰ Glenn Kessler, "Dark money ad claims Susan Collins put old-age programs 'in jeopardy,'" *The Washington Post*, Aug. 19, 2019, available here: https://www.washingtonpost.com/politics/2019/08/19/dark-money-ad-claims-susan-collins-put-old-age-programs-jeopardy/.

²¹ https://www.facebook.com/16CountiesCoalition/videos/1377384222426490/.

https://www.facebook.com/16CountiesCoalition/videos/482356059215476/.

²³ 16 Counties "Patricia" Advertisement available at Facebook Advertising Library here: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&q=16%2_0counties%20coalition%20.

²⁴ https://www.facebook.com/pg/16CountiesCoalition/events/?ref=page internal.

²⁵ 16 Counties "Sense" Advertisement available here:

https://www.facebook.com/16CountiesCoalition/videos/467021217227218/.

²⁶ Facebook Advertising Library, 16 Counties Coalition Digital Advertisements available here: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&q=16%2_0counties%20coalition%20.

Senator Collins. The majority of the digital ads simply promote versions of the television advertisements described above.

Indeed, the 16 Counties Coalition has hosted multiple "Town Hall" and roundtable events that aim to amplify the negative Collins messages in Maine Momentum's advertising. Although the group's Facebook page describes a Town Hall event as a "non-partisan policy discussion," the invitation takes shots at Susan Collins noting that "[i]t's been over 20 years since Senator Collins held an open town hall meeting." Kicking off the group's first "Town Hall with (or without) Senator Collins," Executive Director Willy Ritch set the stage for the discussion to be all about Susan Collins by noting the purpose of the event was to "make sure that our voices are heard even if we are not writing big checks," and attacking Senator Collins' vote on a Republican tax bill that gave "billions of dollars of tax breaks away to these big corporations that have also been writing her tens of thousands of dollars of checks." 28

Correspondence pertaining to the group's most recent event, "Big Checks for Sen. Collins and Community Coffee Roundtable," said it "[s]eems like Sen. Collins is only listening to people who write her big checks for \$1,000s" and urged participants to "sign an actual BIG check (it's about 5' wide!) for 2¢ and tell Collins to start listening to us!" and use "sign and actual BIG check (it's about 5' wide!) for 2¢ and tell Collins to start listening to us!"

Maine Momentum and its project, the 16 Counties Coalition, have also used earned media—including social media platforms on Facebook and Twitter—to attack Susan Collins. While both Maine Momentum and 16 Counties Coalition maintain websites, only the 16 Counties Coalition maintains social media platforms on Twitter and Facebook, which are nearly exclusively dedicated to attacking Susan Collins. For example, roughly 85% of the tweets by the 16 Counties Coalition have featured attacks on Susan Collins. Tindeed, the only account that the 16 Counties Coalition's Twitter handle follows is Susan Collins' Twitter account, which allows the group to see Senator Collins tweets in its feed.³²

Upon the group's launch, its second-ever Facebook post entitled "Our Message To Senator Collins" notes that "It's time to put families and working Mainers above wealthy special interest donors!" In another Facebook post, the group noted that it was launched "to send Congress a message ... Senator Collins took over \$2 million from drug companies, insurance companies, and the healthcare industry, and in turn delivered votes that drive up premiums and cause Mainers to lose access to health care." Despite the group's statement that it was launched to "send Congress a message", its very statement makes clear that the only message it seeks to send concerns Senator Collins. The group's Facebook page has never once mentioned another elected official, including when discussing the policy issues that Maine Momentum and 16 Counties claim are their chief priorities. Instead, nearly every single post attacks Senator Collins and many focus on the source of her political campaign contributions.

²⁷ https://www.facebook.com/events/918844041781693/.

²⁸ Comments of Willy Ritch at Aug. 20, 2019 Town Hall with (or without Susan Collins), posted here: https://www.facebook.com/16CountiesCoalition/videos/842629412788696/.

²⁹ https://www.facebook.com/events/232445501036514/.

³⁰ Exhibit C.

³¹ https://twitter.com/16Coalition.

³² Exhibit D.

³³ Exhibit E.

³⁴ Exhibit F.

Analysis

Federal law and regulations provide that an "organization is operated exclusively for the promotion of social welfare if it is primarily engaged in promoting in some way the common good and general welfare of the community."³⁵ Furthermore, the law provides that a qualifying social welfare organization must be operated such that "no part of the net earnings of such entity inures to the benefit of any private shareholder or individual."36 IRS guidance on this topic notes that "[a]n organization that primarily benefits a private group of citizens cannot qualify for IRC 501(c)(4) exempt status."³⁷ For this reason, the IRS concluded that Emerge Maine and several other state chapters of Emerge America were not "operated primarily to promote social welfare" because the groups' primary activity—a program to train women to run for office as Democratic candidates— was "conducted primarily for the benefit of a political party and a private group of individuals rather than the community as a whole."38 In reaching that conclusion, the IRS noted that a longstanding legal precedent annunciated in American Campaign Academy (a case that concerned a 501(c)(3) organization) "is also the standard for determining what constitutes private benefit for a section 501(c)(4) organization" and "an organization which conducts its educational activities to benefit a political party and its candidates serves private interest."39 In the American Campaign Academy case, the IRS determined that the Academy, whose primary activity was to operate a school training individuals for careers as political campaign professionals who went on to work exclusively for Republican campaigns, was "conducted ... with the partisan objective of benefiting Republican candidates and entities."⁴⁰ Because the court concluded that this activity was substantially for a non-exempt purpose benefiting private interests, it upheld the IRS's determination that the organization was not eligible for tax exempt status.⁴¹

As with the American Campaign Academy, Maine Momentum clearly conducts activities that are designed to serve the private interests of the Maine Democratic Party and its eventual nominee for U.S. Senate in 2020. By focusing on Senator Collins almost entirely, it is seeking to overwhelm Maine voters with negative messages about her in advance of the election and cannot credibly claim to be engaged in effective policy advocacy. Additionally, despite Maine Momentum's supposed interest in policy issues including taxes, health care and drug prices, its public communications have never once mentioned another Maine officeholder's position on those topics (in either a positive or negative light) including the Democrats who represent the state in the U.S. House of Representatives, a Democrat-controlled body. Nor has Maine Momentum otherwise sought to educate the public about policy topics other than through attacks on Senator Susan Collins. Furthermore, the organization's messaging sounds themes that emphasize Senator Collins' campaign contributors and that attack her integrity and personal character. The policy issues the ads reference appear to be an afterthought for the group's thinly veiled attempts to persuade the electorate to adopt a negative view of Senator Collins in the 2020 Senate campaign. The group's claims that ""we're not going to tell anybody who they should or

³⁵ 26 C.F.R. §1.501(c)(4)-1(a)(2)(i).

³⁶ 26 U.S.C. §501(c)(4)(4)(B).

³⁷ Exempt Organizations – Technical Instruction Program for FY 2003, p. I-3.

³⁸ IRS Private Letter Ruling PL 201221025 at pg. 5; *see also* IRS Private Letter Rulings 201221026, 201221027, 201221028, 201221029.

³⁹ Id.

⁴⁰ American Campaign Academy v. Comm'r, 92 T.C. 1053, 1070 (1989).

⁴¹ *Id*.

shouldn't vote for" cannot cure the fact that the group is operating for the sole benefit of the Maine Democratic Party and its eventual 2020 Senate nominee in violation of the private benefit rules for social welfare organizations. In addition, the group is run exclusively by operatives with deep ties to the Maine Democratic Party and to the current frontrunner in the Democratic Senate primary, Sara Gideon. It is therefore no coincidence that the organization launched its activities nearly simultaneously with the announcement of Gideon's campaign for U.S. Senate.

To put a finer point on all of this, the group's own admissions and activities make clear that it operates with the partisan objective of electing a Democrat to represent Maine in the U.S. Senate. Moreover, by running these activities through a social welfare organization that is permitted to raise and spend unlimited corporate funds, the group is functioning as an arm of the Democratic candidate for U.S. Senate's campaign without having to abide by federal campaign contribution or source limits. A recent *Maine Public Radio* story about the group, which has gone unchallenged by Maine Momentum, put it succinctly: "Democrats at the national level and in Maine are using a multipronged strategy to unseat Republican U.S. Sen. Susan Collins in 2020. The plan includes the creation of a new nonprofit group that can shield its donors ..."

Conclusion

Because these facts suggest that the group is not acting in accordance with federal law, we respectfully request that the IRS investigate this matter fully, and, if appropriate, revoke the organization's status as a tax-exempt 501(c)(4) organization.

Sincerely,

Kendra Arnold

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Executive Director, Foundation for Accountability & Civic Trust

⁴² Mistler, *supra* note 1.

⁴³ Mistler, *supra* note 1.



DOMESTIC NONPROJET CORPORATION

STATE OF MAINE

ARTICLES OF INCORPORATION

D Fe	ė No. 20190412ND Pages 5 te Paid \$ 40 CN 2191012230027 ARTI FILED		
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	Copiesy Secretary of Suffe		
	A True Copy When Attested By Signature		
	Deputy Secretary of State		

Pursuant to 13	R MR5A \$403, the undersigned incorporator(s) execute(s) and deliver(s) the following Anteles of Incorporation:		
FIRST:	The name of the corporation is Maine Momentum		
SECOND:	("X" one box only. Attach additional page(a) if necessary.)		
	The corporation is organized as a public banefit corporation for the following purpose or purposes: to educate and engage the public and advocate for public policy spaces in order to promote social welfare as defined in section 501(c)(4) of the Internal Revenue Code of 1986 and the Regulations thereunder, as they now exist or as they may hereafter be amended.		
The corporation is organized as a mutual benefit corporation for all purposes permitted under Title I: not for all such purposes, then for the following purpose or purposes:			
THIRD:	The Rugistured Agent is a: (extect either a Communical or Nancommercial Registered Agent)		
	Commercial Registered Agent CRA Public Number:		
	C T Corporation System		
	(name of commercial registered agent)		
	Nonconversial Registered Agent		
	(name of noncommunicial registered agent) (physical location, not P.O. Box — street, city, state and cip code) (mailing address if different from above)		
FOURTH:	Pursuant to 3 MRSA \$1983, the new commercial registered agent as listed above has ectmented to serve as the registered agent for this nonprofit corporation.		

Perm No. MNPCA-6 (Lof 3)

FIFTH:	tting the initial board of directors of the corporation, if the number has a chosen, is		
		3) shall be and the maximum number	
SIXTH:	Members: ("X" one box only.) There shall be no members. There shall be one or more classes of me	inhers and the information required by 13-B MRSA §402 is attached.	
SEVENTH:	(Optional) (Check if this article is		
		tion shall be the corrying on of propagateds, or otherwise attempting to participate in or intervene in fincluding the publication or distribution any candidate for public office.	
eichth:	(Optional) Check if this article is to apply.) Other provisions of these articles including provisions for the regulation of the internal affairs of the corporation distribution of passes on dissolution or final liquidation and the requirements of the Internal Revenue Code section 501(c) are set out in Exhibit A attached hereto and made a part hereof.		
Incorporators	A market comment	Dates March 26, 2018	
WAT		Street 12 Madison St.	
*	(Millionae)	Emblacess	
Will Pratt		Ponland, ME 04101	
	(type or print neme)	(टांशु: प्रशास अपने काp code)	
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Form No. MNPCA-6 (2 of 3)

For Corporate Incorporators*					
Name of Corporate Incorporator					
(अञ्चालक व विकास	glunding primate sceniciti				
Physic of positiones and called by: Name of Corporate Incorporator	(stry starc and asp entle)				
By	Surset [pd=supal husing + licearos)				
Trype or print hasse and coposity;	(city state and sup coste)				

*Articles are to be executed as follows:

If a corporation is an incorporator (13-B MRSA §401), the name of the corporation should be typed or printed and signed on its behalf by an officer of the corporation. The articles of incorporation must be accompanied by a cartificate of an appropriate efficer of the corporation, not the person signing the unicles, certifying that the person executing the articles on behalf of the corporation was duly authorized to do so.

Please terral your payment made payable to the Maine Secretary of State

Solunit completed form to:

Secretary of State

Division of Corporations, UCC and Commissions

101 State House Station

Augusta, ME 04333-0101 Telephone Inquiries. (207) 624-7752

Entui Inquiries: CEC Corporations Maine gov

Form No. MNPCA-6 (3 of 3) Rev. 9/6/2018

EXHIBIT A

Article Eighth:

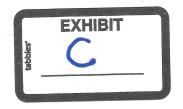
The powers of the Corporation shall be subject to the following terms, provisions and fimitations:

- 1. No part of the net earnings of the Corporation shall inure to the benefit of any director or officer of the Corporation, or any private person, except that reasonable compensation may be paid for services actually rendered to or for the Corporation, and no director or officer of the Corporation, or any private person, shall be entitled to share in the distribution of any of the corporate assets on dissolution of the Corporation.
- 2. In the event of the liquidation, dissolution, or winding up of the Corporation in any manner or for any reason whatever, all of the assets of the Corporation after the payment of the obligations and liabilities of the Corporation shall be distributed for one or more exempt purposes within the meaning of Code Sections 501(c)(4) or 501(c)(3), or shall be distributed to the federal government, or to a state or local government, for a public purpose.





https://twitter.com/ChrisGlynn207/status/1167287519324643328



Hey wit's Lily w/ 16 Counties Coalition. Seems like Sen. Collins is only listening to people who write her big checks for \$1,000s and we think it's time she gets our 2¢! So we want you to join us on Friday at 9AM @ Tandem Coffee & Bakery to sign an actual BIG check (it's about 5' widel) for 2¢ and tell Collins to start listening to us! Can you join?



https://twitter.com/16Coalition/following



16 Counties Coalition

@16coalition

Followers you know

Followers

Following



Sen. Susan Collins

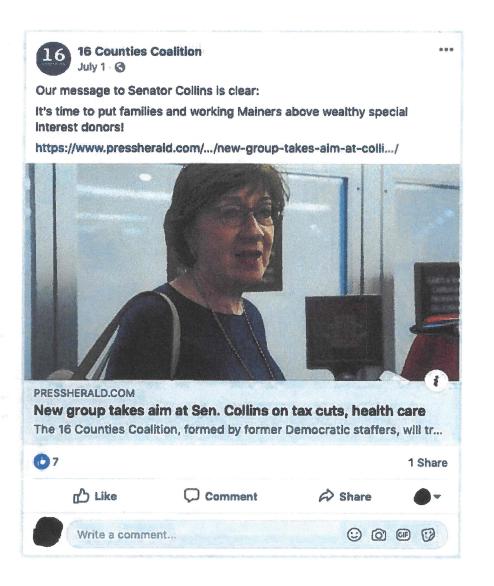
@SenatorCollins

Following

United States Senator from Maine. All tweets originate from the Press Office of Senator Susan Collins.



https://www.facebook.com/16CountiesCoalition/posts/390013415192781







We launched 16 Counties Coalition to send Congress a message:

The people of Maine won't back down so long as our elected officials vote in favor of legislation that puts our lives at risk. Senator Collins took over \$2 million from drug companies, insurance companies, and the healthcare industry, and in turn delivered votes that drive up premiums and cause Mainers to lose access to health care.

Join 16 Counties Coalition and demand that our elected officials work for the many, not the few: 16CountiesCoalition.org



https://www.facebook.com/16CountiesCoalition/posts/390646041796185