

MAINE SUPREME JUDICIAL COURT

Tina M. Adams v. Michael A. Delong

Adams, 2026 ME 35 (Maine Supreme Judicial Court 2026) · No. Pen-24-587 · Decided April 16, 2026

SUMMARY

The Maine Supreme Judicial Court reviewed a divorce judgment involving the division of Bucksport real estate, valuation and classification of an airplane, and disposition of a jointly owned LLC. The court affirmed the findings that the airplane was marital property and was not a business asset, but vacated its valuation because it was unsupported by the evidence. The court also held that the divorce court lacked jurisdiction to dissolve the LLC, and remanded for reconsideration of the real estate distribution, airplane valuation, and LLC ownership interests.

CASE DETAILS

COURT	Maine Supreme Judicial Court
WRITING FOR THE COURT	LAWRENCE, J.; STANFILL, C.J.; MEAD, J.; CONNORS, J.; LIPEZ, J.
JURISDICTION	Maine Supreme Judicial Court
DECIDED	April 16, 2026
DOCKET	Pen-24-587
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Michael A. Delong appealed from a judgment of divorce entered by the Bangor District Court after the court incorporated the parties' partial settlement agreement and resolved remaining contested property issues.
STANDARD OF REVIEW	Property division in a divorce action is reviewed for abuse of discretion; valuation of marital property is reviewed for clear error; jurisdictional questions are reviewed de novo.
PRECEDENTIAL VALUE	Published and precedential Maine Supreme Judicial Court opinion.
PARTIES	Michael A. Delong v. Tina M. Adams

TOPICS

- dissolution of marriage
- equitable distribution
- limited liability companies
- family law procedure
- appellate procedure

PRACTICE AREAS

family law

real estate

limited liability companies

appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion in treating the airplane as marital property rather than as a business asset set aside to Delong.
2. Whether the trial court clearly erred in valuing the airplane at \$37,500.
3. Whether the trial court had jurisdiction to dissolve the jointly owned LLC in a judgment of divorce.
4. Whether the trial court's distribution of the Bucksport real estate should be reconsidered in light of the errors concerning the airplane and LLC.

HOLDINGS

1. The airplane was marital property subject to division, and the trial court did not abuse its discretion in finding that it was used primarily for personal rather than business purposes.
2. The trial court clearly erred by valuing the airplane at \$37,500 because the record did not support the \$40,000 figure on which the valuation was based and the valuation was not a reasoned evaluation of all the evidence.
3. A court may not dissolve an LLC as part of a judgment of divorce because the LLC is a separate entity and is not a party to the divorce action, and the applicable LLC statute does not include divorce among the circumstances authorizing judicial dissolution.
4. The court vacated the distribution of the Bucksport real estate and remanded for reconsideration because the trial court must reconsider the overall distribution of the marital estate after correcting the airplane valuation and LLC disposition.

KEY QUOTATIONS

“The court’s valuation of assets must reflect a reasoned evaluation by the court of all of the evidence.” (¶ 21)

“A court can obtain personal jurisdiction only over the parties to a case, and a court “may not exercise personal jurisdiction over an LLC in a divorce action” because an LLC “is an entity distinct from its members” and therefore not a party to divorce.” (¶ 24)

“Moreover, an LLC may not be dissolved as part of a judgment of divorce.” (¶ 25)

FACTUAL BACKGROUND

The parties married in 2006 and purchased Bucksport real estate in 2018, later operating it as a short-term rental business through a jointly owned LLC. After Adams obtained a protection-from-abuse order in 2022, she alone maintained, improved, operated, and prepared the property for sale, while Delong removed up to \$6,000 from the business account for nonbusiness expenses. The parties also owned a 2009 SeaRey airplane acquired during the marriage; the trial court found it was marital property used primarily for personal rather than business

purposes, valued it at \$37,500, and awarded it to Delong subject to an equalization payment. The trial court also ordered dissolution of the LLC.

PROCEDURAL HISTORY

Adams filed for divorce in December 2020. Following a partial settlement, the District Court held a hearing on the contested disposition of real estate, an airplane, and related financial matters, entered a divorce judgment, and later entered an amended judgment by stipulation. The District Court awarded Adams 60% of the Bucksport real estate, valued the airplane at \$37,500, and ordered dissolution of the jointly owned LLC. Delong appealed.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Vacate the judgment concerning the distribution of the proceeds from the Bucksport real estate, the valuation of the airplane, and the dissolution of the LLC. Reconsider the airplane's value, determine how to distribute the LLC membership interests or ownership as part of the marital estate rather than dissolving the LLC, and reconsider the distribution of the marital estate and Bucksport real-estate proceeds in light of those changes.

CASES CITED

- Buck v. Buck, 2015 ME 33, ¶ 5, 113 A.3d 1095
- Macdonald v. Macdonald, 532 A.2d 1046, 1050 (Me. 1987)
- Viola v. Viola, 2015 ME 6, ¶ 9, 109 A.3d 634
- Murphy v. Murphy, 2003 ME 17, ¶ 27, 816 A.2d 814
- Nou v. Hout, 2025 ME 44, ¶¶ 22-23, 335 A.3d 603
- Bernsten v. Bernsten, 2017 ME 111, ¶ 13, 163 A.3d 820
- Bolduc v. Bolduc, 2023 ME 54, ¶ 12, 301 A.3d 771
- Littell v. Bridges, 2023 ME 29, ¶¶ 11-12, 293 A.3d 445
- Robinson v. Robinson, 2000 ME 101, ¶¶ 8-11, 751 A.2d 457
- Howard v. Howard, 2010 ME 83, ¶ 10, 2 A.3d 318