

## REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: November 21, 2016

ANALYST: Kaitlin Seufert

## I. COMMITTEE:

Right to Rise USA  
(C00571372 )  
Charles R. Spies, Treasurer  
6230 Wilshire Blvd.  
PMB 1790  
Los Angeles, CA 90048-5126

## II. RELEVANT STATUTE:

52 U.S.C. §30104(b)(6)(B)(iii)  
52 U.S.C. §30104(g)(2)  
11 CFR §104.3(b)(3)(vii)  
11 CFR §104.4(b) and (c)

## III. BACKGROUND:

**Independent Expenditure Reporting Problems**

Right to Rise USA ("the Committee") failed to provide the election state for twenty-one (21) independent expenditures totaling \$16,120,606.50, which were made on behalf of a presidential candidate for the 2016 primary elections. The independent expenditures with missing information were disclosed on twenty (20) 48-Hour Reports of Independent Expenditures (Attachment 2). In addition, the Committee failed to provide the election state on the corresponding twenty-two (22)<sup>1</sup> independent expenditures totaling \$16,123,716.50 disclosed on its 2015 Year-End Report, 2016 February Monthly Report and 2016 March Monthly Report (Attachment 3).

**48-Hour Reports**

On October 23, 2015, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed two (2) independent expenditures totaling

<sup>1</sup> One of the independent expenditures that did not include an election state did not have a corresponding 48-Hour Report, therefore it was only questioned on the 2016 February Monthly Report.

\$1,353,950.10 designated to the Presidential primary election for which no election state was provided (Image 201510239003239900).

On November 7, 2015, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$18,932.47 designated to the Presidential primary election for which no election state was provided (Image 201511079003294525).

Also on November 7, 2015, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$6,666,566.00 designated to the Presidential primary election for which no election state was provided (Image 201511079003294524).

On November 12, 2015, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$5,923.34 designated to the Presidential primary election for which no election state was provided (Image 201511129003334960).

Also on November 12, 2015, a Request for Additional Information (“RFAI”) was sent to the Committee referencing the 48-Hour Report of Independent Expenditures, received October 23, 2015. The RFAI stated that the Committee failed to provide the election state for two (2) independent expenditures and advised the Committee to amend the report to provide the missing information (Image 201511120300007727).

On November 26, 2015, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$3,183.36 designated to the Presidential primary election for which no election state was provided (Image 201511269004120147).

On November 30, 2015, three (3) RFAIs were sent to the Committee referencing the 48-Hour Reports of Independent Expenditures, received November 7, 2015 and November 12, 2015. The RFAIs stated that the Committee failed to provide the election state for three (3) independent expenditures and advised the Committee to amend the reports to provide the missing information (Images 201511300300008340, 201511300300008343, and 201511300300008346).

On December 2, 2015, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$227,685.83 designated to the Presidential primary election for which no election state was provided (Image 201512029004144406).

On December 6, 2015, an RFAI was sent to the Committee referencing the 48-Hour Report of Independent Expenditures, received November 26, 2015. The RFAI stated that the Committee failed to provide the election state for one (1) independent expenditure and advised the Committee to amend the report to provide the missing information (Image 201512060300008470).

On December 10, 2015, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$4,236.24 designated to the Presidential primary election for which no election state was provided (Image 201512109004171502).

On December 10, 2015, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$5,917.84 designated to the Presidential primary election for which no election state was provided (Image 201512109004171505).

On December 13, 2015, an RFAI was sent to the Committee referencing the 48-Hour Report of Independent Expenditures, received December 2, 2015. The RFAI stated that the Committee failed to provide the election state for one (1) independent expenditure and advised the Committee to amend the report to provide the missing information (Image 201512130300008751).

On December 17, 2015, the Committee filed a Miscellaneous Electronic Submission ("FEC Form 99"), which stated, in part:

"This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RFAI") dated November 12, 2015, concerning Right to Rise USA's ("RTR") 48-Hour Independent Expenditure Report filed on October 23, 2015. In the RFAI, RAD requests that RTR "amend the 48-Hour Report by providing the state" for two national cable independent expenditures made on October 21, 2015. These were expenditures for a national cable media buy on the Fox News network that were not specific to any state. Unlike broadcast media buys made on a local-affiliate basis, these buys were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such a buy on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements" (Image 201512179004293865).

On December 20, 2015, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$4,172.97 designated to the Presidential primary election for which no election state was provided (Image 201512209004400846).

Also on December 20, 2015, two (2) RFAIs were sent to the Committee referencing the 48-Hour Reports of Independent Expenditures, received December 10, 2015. The RFAIs stated that the Committee failed to provide the election state for two (2) independent expenditures and advised the Committee to amend the reports to provide the missing information (Images 201512200300008868 and 201512200300008871).

On December 23, 2015, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling

\$2,806.17 designated to the Presidential primary election for which no election state was provided (Image 201512239004414588).

On January 4, 2016, the Committee filed three (3) FEC Form 99s, in response to the RFAIs sent on November 30, 2015. The FEC Form 99s stated, in part:

"These were expenditures for a national cable media buy on the Fox News network that were not specific to any state. Unlike broadcast media buys made on a local-affiliate basis, these buys were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such a buy on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements" (Images 201601049004430868, 201601049004430869, and 201601049004430870).

On January 5, 2016, Jim Tyrrell, a representative of the Committee, called the Reports Analysis Division (RAD) Analyst. The Analyst explained that the Committee's response to the RFAI they received for the 48-Hour Report filed on October 23, 2015 was inadequate and could be referred for further action. The Committee stated that they were aware the response was inadequate, but were satisfied with their response given the current status of the issue before the Commission. The Analyst explained that they were informing the Committee of the potential referable issue as a courtesy so they could put further explanation on the public record if they wished to do so (Attachment 5).

On January 7, 2016, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$4,125,000.00 designated to the Presidential primary election for which no election state was provided (Image 201601079004443089).

On January 9, 2016, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$9,783.50 designated to the Presidential primary election for which no election state was provided (Image 201601099004446121).

On January 11, 2016, the Committee filed an FEC Form 99, which stated, in part:

"This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RFAI") dated December 6, 2015, concerning Right to Rise USA's ("RTR") 48-Hour Independent Expenditure Report filed on November 26, 2015. In the RFAI, RAD requests that RTR "amend the 48-Hour Report by providing the state" for national cable independent expenditures made on November 24, 2015. These were expenditures for a national cable media buy on the Fox News network that were not specific to any state. Unlike broadcast media buys made on a local-affiliate basis, these buys were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and

the fact of national airing makes it impossible to itemize such a buy on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements" (Image 201601119004470185).

On January 13, 2016, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$13,601.00 designated to the Presidential primary election for which no election state was provided (Image 201601139004483300).

On January 18, 2016, two (2) RFAIs were sent to the Committee referencing the 48-Hour Reports of Independent Expenditures, received December 20, 2015 and December 23, 2015. The RFAIs stated that the Committee failed to provide the election state for two (2) independent expenditures and advised the Committee to amend the reports to provide the missing information (Images 201601180300009465 and 201601180300009468).

On January 19, 2016, the Committee filed three (3) FEC Form 99s in response to the RFAIs sent on December 13, 2015 and December 20, 2015. The FEC Form 99s stated, in part:

"These were expenditures for a national cable media buy on the Fox News network that were not specific to any state. Unlike broadcast media buys made on a local-affiliate basis, these buys were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such a buy on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements" (Images 201601199004527478, 201601199004527479, and 201601199004527480).

On January 23, 2016, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$7,793.43 designated to the Presidential primary election for which no election state was provided (Image 201601239004570258).

On January 31, 2016, four (4) RFAIs were sent to the Committee referencing the 48-Hour Reports of Independent Expenditures, received January 7, 2016, January 9, 2016, January 13, 2016, and January 23, 2016. The RFAIs stated that the Committee failed to provide the election state for four (4) independent expenditures and advised the Committee to amend the reports to provide the missing information (Images 201601310300009698, 201601310300009701, 201601310300009803, and 201601310300009907).

On February 3, 2016, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$791,519.50 designated to the Presidential primary election for which no election state was provided (Image 201602039008437507).

On February 4, 2016, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$10,123.25 designated to the Presidential primary election for which no election state was provided (Image 201602049008439749).

On February 12, 2016, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$2,200,000.00 designated to the Presidential primary election for which no election state was provided (Image 201602129008458213).

On February 13, 2016, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$400,000.00 designated to the Presidential primary election for which no election state was provided (Image 201602139008458545).

On February 14, 2016, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$19,411.50 designated to the Presidential primary election for which no election state was provided (Image 201602149008458615).

On February 17, 2016, two (2) RFAs were sent to the Committee referencing the 48-Hour Reports of Independent Expenditures, received February 3, 2016 and February 4, 2016. The RFAI stated that the Committee failed to provide the election state for two (2) independent expenditures and advised the Committee to amend the reports to provide the missing information (Images 201602170300035375 and 201602170300035378).

On February 18, 2016, the Committee filed a 48-Hour Report of Independent Expenditures. The report disclosed one (1) independent expenditure totaling \$250,000.00 designated to the Presidential primary election for which no election state was provided (Image 201602189008492077).

On February 22, 2016, the Committee filed two (2) FEC Form 99s in response to the RFAs sent on January 18, 2016. The FEC Form 99s stated, in part:

"These were expenditures for national cable media production on the Fox News network that were not specific to any state. Unlike broadcast media made on a local-affiliate basis, these ads were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such costs on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements" (Images 201602229009618680 and 201602229009618682).

On March 1, 2016, four (4) RFAs were sent to the Committee referencing the 48-Hour Reports of Independent Expenditures, received February 12, 2016, February 13, 2016, February

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14, 2016, and February 18, 2016. The RFAs stated that the Committee failed to provide the election state for four (4) independent expenditures and advised the Committee to amend the reports to provide the missing information (Images 201603010300038939, 201603010300038942, 201603010300038945, and 201603010300038966).

On March 7, 2016, the Committee filed four (4) FEC Form 99s in response to the RFAs sent on January 31, 2016. The FEC Form 99s stated, in part:

"These were expenditures for a national cable media buy on the Fox News network that were not specific to any state. Unlike broadcast media buys made on a local-affiliate basis, these buys were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such costs on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements" (Images 201603079009661965, 201603079009661967, 201603079009661968, and 201603079009661969).

On March 23, 2016, the Committee filed two (2) FEC Form 99s in response to the RFAs sent on February 17, 2016. The FEC Form 99s stated, in part:

"These were expenditures for national cable media buys on the Fox News network that were not specific to any state. Unlike broadcast media made on a local-affiliate basis, these ads were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such costs on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements" (Images 201603239011956957 and 201603239011956958).

On April 5, 2016, the Committee filed four (4) FEC Form 99s in response to the RFAs sent on March 1, 2016. The FEC Form 99s stated, in part:

"These were expenditures for national cable media buys on the Fox News network that were not specific to any state. Unlike broadcast media made on a local-affiliate basis, these ads were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such costs on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements" (Images 201604059012225056, 201604059012225057, 201604059012225058, and 201604059012225059).

## **2015 Year-End Report**

On January 31, 2016, the Committee filed the 2015 Year-End Report covering the period from July 1, 2015 through December 31, 2015. The report disclosed eleven (11) independent expenditures totaling \$8,293,374.32 on Schedule E supporting Line 24 (Itemized Independent Expenditures) of the Detailed Summary Page that did not identify the state information for the independent expenditures. These expenditures corresponded with the eleven (11) independent expenditures disclosed on the 48-Hour Reports filed on October 23, 2015, November 7, 2015, November 12, 2015, November 26, 2015, December 2, 2015, December 10, 2015, December 20, 2015 and December 23, 2015 (Images 201601319005191139-380).

On April 13, 2016, an RFAI was sent to the Committee referencing the 2015 Year-End Report. Among other items, the RFAI stated that the Committee failed to provide the election state for eleven (11) independent expenditures disclosed on Schedule E, supporting Line 24 (Itemized Independent Expenditures) of the Detailed Summary Page. The RFAI advised the Committee to amend the report to provide the missing information (Image 201604130300041574).

On May 18, 2016, the Committee filed an FEC Form 99, which stated, in part:

"This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RFAI") dated April 13, 2016, concerning Right to Rise USA's ("RTR") 2015 Year-End Report filed on January 31, 2016. The RFAI requests clarification of several items, which are addressed in turn below.

...These were expenditures for national cable media buys on the Fox News network that were not specific to any state. Unlike broadcast media buys made on a local-affiliate basis, these buys were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing make it impossible to itemize such buys on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements" (Image 201605189015534797).

On May 20, 2016, the Committee filed an Amended 2015 Year-End Report. The report disclosed no change in information provided for independent expenditures on Schedule E (Images 201605209015994092-4333).

## **2016 February Monthly Report**

On February 20, 2016, the Committee filed the 2016 February Monthly Report covering the period from January 1, 2016 through January 31, 2016. The report disclosed six (6) independent expenditures totaling \$6,359,287.93 on Schedule E supporting Line 24 (Itemized Independent Expenditures) of the Detailed Summary Page that did not identify the state information for the independent expenditures. These expenditures corresponded with

five (5)<sup>2</sup> independent expenditures disclosed on the 48-Hour Reports filed on January 7, 2016, January 9, 2016, January 13, 2016, January 23, 2016 and February 12, 2016 (Images 201602209008574875-5009).

On April 13, 2016, an RFAI was sent to the Committee referencing the 2016 February Monthly Report. Among other items, the RFAI stated that the Committee failed to provide the election state for six (6) independent expenditures disclosed on Schedule E, supporting Line 24 (Itemized Independent Expenditures) of the Detailed Summary Page. The RFAI advised the Committee to amend the report to provide the missing information (Image 201604130300041585).

On May 18, 2016, the Committee filed an FEC Form 99, which stated, in part:

"This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RFAI") dated April 13, 2016, concerning Right to Rise USA's ("RTR") February Monthly Report filed on February 20, 2016. The RFAI requests clarification of several items, which are addressed in turn below.

...These were expenditures for national cable media buys on the Fox News network that were not specific to any state. Unlike broadcast media buys made on a local-affiliate basis, these buys were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing makes it impossible to itemize such buys on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements" (Image 201605189015534798).

On May 20, 2016, the Committee filed an Amended 2016 February Monthly Report. The report disclosed no change in information provided for independent expenditures on Schedule E (Images 201605209015994940-5074).

## 2016 March Monthly Report

On March 20, 2016, the Committee filed the 2016 March Monthly Report covering the period from February 1, 2016 through February 29, 2016. The report disclosed five (5) independent expenditures totaling \$1,471,054.25 on Schedule E supporting Line 24 (Itemized Independent Expenditures) of the Detailed Summary Page that did not identify the state information for the independent expenditures. These expenditures corresponded with five (5) independent expenditures disclosed on the 48-Hour Reports filed on February 3, 2016, February 4, 2016, February 13, 2016, February 14, 2016 and February 18, 2016 (Images 201603209011682494-2573).

On May 18, 2016, an RFAI was sent to the Committee referencing the 2016 March Monthly Report. Among other items, the RFAI stated that the Committee failed to provide the

<sup>2</sup> An independent expenditure totaling \$3,110.00 on Schedule E of the 2016 February Monthly Report did not have a corresponding 48-Hour Report, therefore it was only questioned on the 2016 February Monthly Report.

election state for five (5) independent expenditures disclosed on Schedule E, supporting Line 24 (Itemized Independent Expenditures) of the Detailed Summary Page. The RFAI advised the Committee to amend the report to provide the missing information (Image 201605180300047281).

On June 22, 2016, the Committee filed an FEC Form 99, which stated, in part:

"This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RFAI") dated May 18, 2016, concerning Right to Rise USA's ("RTR") 2016 March Monthly Report filed on March 20, 2016. The RFAI requests clarification of several items, which are addressed in turn below.

These were expenditures for national cable media buys on the Fox News network that were not specific to any state. Unlike broadcast media buys made on a local-affiliate basis, these buys were aired to every Fox News cable subscriber nationwide. A combination of differing pricing models and the fact of national airing make it impossible to itemize such buys on a per-state basis. We urge the Commission to provide clarity to groups participating in the 2016 Presidential primary elections and adopt a reasonable interpretive rule governing these types of national advertisements" (Image 201606229020090889).

To date, no further communication has been received from the Committee regarding this matter.

#### **Failure to Provide Supporting Schedules (Failure to Timely File 48-Hour Reports)**

Right to Rise USA ("the Committee") failed to timely file one (1) 48-Hour Report supporting fifty (50) independent expenditures totaling \$41,745.17 disclosed on the 2015 Year-End Report, made up to and including the 20th day before the 2016 primary elections held in the states of Alabama, Arkansas, Georgia, Massachusetts, Michigan, Oklahoma, Tennessee, Texas, Virginia, and Vermont (Attachment 4).

On January 31, 2016, the Committee filed the 2015 Year-End Report covering the period from July 1, 2015 through December 31, 2015, which included a Schedule E (Itemized Independent Expenditures) disclosing four hundred and eighty-four (484) independent expenditures totaling \$47,171,785.91, made in support of one (1) federal candidate, and in opposition to one (1) federal candidate. The Committee failed to timely file one (1) 48-Hour Report to support fifty (50) independent expenditures totaling \$41,745.17 for the 2016 primary elections in the states of Alabama, Arkansas, Georgia, Massachusetts, Michigan, Oklahoma, Tennessee, Texas, Virginia and Vermont (Images 201601319005191139-380).

On April 13, 2016, a Request for Additional Information ("RFAI") was sent to the Committee referencing the 2015 Year-End Report. Among other items, the RFAI noted that the Committee may have failed to timely file one or more of the required 48-Hour Reports for the independent expenditures disclosed on the report. A chart was enclosed with the RFAI which,

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among other issues, identified fifty (50) independent expenditures totaling \$41,745.17, for which 48-Hour Reports had not been timely filed (Image 201604130300041574).

On May 18, 2016, the Committee filed a Miscellaneous Electronic Submission (FEC Form 99), which stated, in part:

"This response pertains to the Reports Analysis Division's ("RAD") Request for Additional Information ("RFAI") dated April 13, 2016, concerning Right to Rise USA's ("RTR") 2015 Year-End Report filed on January 31, 2016. The RFAI requests clarification of several items, which are addressed in turn below.

...The independent expenditures cited in the attachment did not aggregate to \$10,000 or more with respect to any given election. Accordingly, RTR was not required to file 48-hour independent expenditure reports for these disbursements" (Image 201605189015534797).

On September 23, 2016, the RAD Analyst called Jim Tyrrell, a representative of the Committee, to discuss the potential referable issue on the Committee's 2015 Year-End Report. The Analyst explained that the missing 48-Hour Report could be referred for further action. Mr. Tyrrell explained that he was not aware that 48-Hour Reports were required for the referenced independent expenditures since they were not in excess of \$10,000. The Analyst informed Mr. Tyrrell of 48-Hour Report requirements, specifically highlighting that all independent expenditures that helped trigger the \$10,000 threshold and have not been previously disclosed should be included in the 48-Hour Report. The Analyst also pointed Mr. Tyrrell to resources for further clarification in the Campaign Guide and RAD FAQs. Finally, the Analyst explained that they were informing the Committee of the potential referable issue as a courtesy, so they could put further explanation on the public record if they wished to do so (Attachment 5).

To date, no further communication has been received from the Committee regarding these matters.

Treasurer Name: SPIES, CHARLES R. Cmt. ID: C00571372 Cmt. Name: RIGHT TO RISE USA									
Cmt. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Address: 6220 WILSHIRE BLVD. PMB 1790, LOS ANGELES, CA 90048-5126									
Cmt. Designation: B (LOBBYIST/STREGISTRANT PAC) Filing Frequency: MONTHLY FILER									
Form Type	Rpt. Type	Amt	Recpt. Dt	Pgs	Beginning#	End Ctg. Dt	End Ctg. Dt	Begin Cash	Recpts
MS-T			10/27/2015	1	201510278003244108				Disb
MS-T			12/17/2015	1	201512178004293885				
MS-T			1/4/2016	1	201601049004309868				
MS-T			1/4/2016	1	201601049004309869				
MS-T			1/4/2016	1	201601049004430810				
MS-M			1/8/2016	1	201601089004439835				
MS-T			1/11/2016	1	201601119004470185				
MS-O			1/12/2016	2	201601120300009347				
MS-T			1/19/2016	1	201601198004527478				
MS-T			1/19/2016	1	201601198004527479				
MS-T			1/18/2016	1	201601198004527480				
MS-T			2/2/2016	1	2016022280009818880				
MS-T			2/22/2016	1	2016022280009818882				
MS-T			3/7/2016	1	201603079009861985				
MS-T			3/7/2016	1	201603079009861987				
MS-T			3/7/2016	1	201603079009861988				
MS-T			3/7/2016	1	201603079009861989				
MS-T			3/23/2016	1	201603238011956987				
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MS-T			4/6/2016	1	201604058012225058				
MS-T			4/5/2016	1	201604058012225057				
MS-T			4/5/2016	1	201604058012225058				
MS-T			4/5/2016	1	201604058012225059				
MS-T			5/18/2016	1	201605188015534197				
MS-T			5/18/2016	1	201605188015534198				
MS-T			6/22/2016	1	201606228020908889				
RQ2	48		1/18/2016	3	201601180300009465				1/18/2016
RQ2	48		1/18/2016	3	201601180300009466				1/18/2016
RQ2	48		1/31/2016	3	201601310300009468				1/31/2016
RQ2	48		1/31/2016	3	201601310300009469				1/31/2016
RQ2	48		1/31/2016	3	201601310300009701				1/31/2016
RQ2	48		1/31/2016	3	201601310300009803				1/31/2016
RQ2	48		1/31/2016	3	201601310300009807				1/31/2016
RQ2	48		2/17/2016	3	201602170300035375				2/17/2016
RQ2	48		2/17/2016	3	201602170300035378				2/17/2016
RQ2	48		11/12/2015	3	201511120300007727				11/12/2015
RQ2	48		12/6/2015	3	201512060300008470				12/6/2015
RQ2	48		12/20/2015	3	201512200300008868				12/20/2015
RQ2	48		12/20/2015	3.	201512200300008871				12/20/2015
RQ2	48		3/1/2016	3	2015130300008343				3/1/2016
RQ2	48		3/1/2016	3	2015130300008346				3/1/2016
RQ2	48		3/1/2016	3	2015130300008347				3/1/2016
RQ2	48		3/1/2016	3	20150922030005044				3/1/2016
RQ2	48		3/1/2016	3	20151130030008340				3/1/2016
RQ2	48		11/30/2015	3	20151130030008343				11/30/2015
RQ2	48		11/30/2015	3	20151130030008346				11/30/2015
RQ2	48		12/13/2015	3	20151213030008751				12/13/2015
RQ2	48		9/22/2015	A					9/22/2015

YE	N	4/13/2016	5	201604130300041574	7/1/2015	12/31/2015	4/13/2016	
RQ2	M2	N	4/13/2016	5	201604130300041595	1/1/2016	1/31/2016	4/13/2016
RQ2	M3	N	5/18/2016	3	201605180300047281	2/1/2016	2/29/2016	5/18/2016
RQ2	M6	N	10/30/2016	2	20161030030004525	5/1/2016	5/31/2016	10/30/2016
F3XN	MY	N	7/31/2015	1656	201507319004471819	1/1/2015	6/30/2015	\$103,167,845
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F3XA	MY	A	8/1/2015	1656	201508018000774082	1/1/2015	6/30/2015	\$103,167,845
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F3XA	MY	A	10/27/2015	1657	201510279003242451	1/1/2015	6/30/2015	\$103,167,845
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F3XN	YE	N	1/31/2016	639	201601319005190742	7/1/2015	12/31/2015	\$97,723,507
F3XA	YE	A	5/20/2016	639	201605209015983865	7/1/2015	12/31/2015	\$97,723,507
F3XN	M2	N	2/20/2016	210	201602209008574800	1/1/2016	1/31/2016	\$58,578,054
F3XA	M2	A	5/20/2016	210	201605209015984865	1/1/2016	1/31/2016	\$58,578,054
F3XN	M3	N	3/20/2016	167	201603209015982407	2/1/2016	2/29/2016	\$24,448,889
F3XN	M4	N	4/20/2016	167	201604209014511495	3/1/2016	3/31/2016	\$17,303,167
F3XN	M5	N	5/20/2016	23	201605209015985119	4/1/2016	4/30/2016	\$53,084
F3XN	M6	N	6/20/2016	812	201606209018475880	5/1/2016	5/31/2016	\$17,067,849
F3XN	M7	N	7/20/2016	12	201607209021674526	6/1/2016	6/30/2016	\$3,081,808
F3XN	M8	N	8/20/2016	12	201608209022845879	7/1/2016	7/31/2016	\$101,675
F3XN	M9	N	9/20/2016	8	2016092090312695	8/1/2016	8/31/2016	\$3,081,228
F3XN	M10	N	10/20/2016	11	201610209034198469	9/1/2016	9/30/2016	\$33,341
F3XN	12G	N	10/27/2016	9	201610279038848436	10/1/2016	10/19/2016	\$3,051,032
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F24N	48	10/1/2015	2	201510019002790456
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F24N	48	10/8/2015	1	201510080002824787
F24N	48	10/10/2015	2	2015101080002834582
F24N	48	10/10/2015	2	2015101080002834630
F24N	48	9/25/2015	2	201509259002783713
F24N	48	9/24/2015	2	201509249002778706
F24N	48	10/23/2015	1	2015102390003239800
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F24N	48	12/12/2015	9	201512129004175973
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F24N	48	12/7/2015	1	201512079004152373
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F24N	48	12/23/2015	3	20151223900414596
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F24N	48	12/24/2015	1	201512249004414785
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F24N	48	12/20/2015	2	20151220900440842
F24N	48	12/20/2015	3	20151220900440844
F24N	48	12/18/2015	2	2015121890044088121
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F24N	48	12/30/2015	1	201512309004425517
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F24N	48	12/3/2015	2	20151203900446139
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F24N	48	12/3/2015	9	20151203900446143
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F24N	24	12/7/2016	1	201601279004404063108

F24N	24	1/27/2016	1	2016012790047039109
F24N	24	1/28/2016	1	201601289004703913
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F24N	24	1/28/2016	1	201601289004703916
F24N	24	1/28/2016	1	201601289004703917
F24N	24	1/28/2016	1	201601289004703918
F24N	24	1/28/2016	1	201601289004703919
F24N	24	1/28/2016	1	201601289004703920
F24N	24	1/28/2016	1	201601289004703921
F24N	24	1/28/2016	1	201601289004703922
F24N	24	2/2/2016	1	201602029008436146
F24N	24	2/2/2016	1	201602029008436147
F24N	24	1/30/2016	1	201601309004960205
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F24N	24	1/30/2016	1	201601309004960207
F24N	48	1/30/2016	1	201601309004960216
F24N	24	1/30/2016	1	201601309004960241
F24N	24	2/2/2016	1	201602029008436148
F24N	24	2/2/2016	1	201602029008436149
F24N	24	2/2/2016	1	201602029008436150
F24N	24	2/2/2016	1	201602029008436151
F24N	24	2/2/2016	1	201602029008436152
F24N	24	2/3/2016	1	201602029008437489
F24N	24	2/3/2016	1	201602029008437499
F24N	24	2/3/2016	1	201602029008437505
F24N	48	2/3/2016	1	201602029008437507
F24N	24	2/3/2016	1	201602029008437508
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F24N	24	2/3/2016	1	201602029008437511
F24A	24	2/3/2016	1	201602029008437522
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F24N	48	10/15/2015	1	201510159003051190
F24N	48	10/15/2015	1	201510159003054594
F24N	48	10/18/2015	1	201510189003103176
F24N	48	11/1/2015	2	2015111900305382
F24N	48	11/1/2015	4	2015111900305384
F24N	48	11/1/2015	4	2015111900305388
F24N	48	11/19/2015	1	20151119900336364
F24N	48	11/19/2015	4	20151119900336365
F24N	48	11/19/2015	4	20151119900336369
F24N	48	11/16/2015	1	20151116900331252

Form Tp	Rpt Tp	AI	Recpt Dt	Pgs	Begin Img#	Begin Img#	Beg Cvg Dt	End Cvg Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
F24N	48		1/12/2015	2	2015111280003334559										
F24N	48		1/15/2015	1	2015111580003340587										
F24N	48		1/18/2015	3	2015111880003373410										
F24N	48		1/25/2015	1	2015112580004120131										
F24N	48		1/25/2015	2	2015112580004120132										
F24N	48		1/26/2015	3	2015112680004120147										
F24N	48		1/27/2015	2	2015112780004120301										
F24N	48		1/5/2015	2	2015110580003292666										
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F24N	48		1/5/2015	1	2015110580003292671										
F24N	48		1/7/2015	1	2015110780003294524										
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F24N	48		1/4/2015	1	2015110490003283700										
F24N	48		1/3/2015	4	2015110380003281374										
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F24N	48		1/8/2015	1	2015110880003294579										
F24N	48		12/22/2015	3	20151228000414404										
Totals															

Form Tp	Rpt Tp	AI	Recpt Dt	Pgs	Begin Img#	Begin Img#	Beg Cvg Dt	End Cvg Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
O-Index															
Treasurer Name: SPIES, CHARLES R.															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE)															
Address: 6230 WILSHIRE BLVD. PMB 1790, LOS ANGELES, CA 90048-5126															
Cmte. Designation: B (LOBBYIST/REGISTRANT PAC)															
Filing Frequency: MONTHLY FILER															

Form Tp	Rpt Tp	AI	Recpt Dt	Pgs	Begin Img#	Begin Img#	Beg Cvg Dt	End Cvg Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
O-Index (2013-2014)															
Treasurer Name: SPIES, CHARLES R.															
Cmte. ID: C00571372															
Cmte. Name: RIGHT TO RISE USA															
Address: 6230 WILSHIRE BLVD. PMB 1790, LOS ANGELES, CA 90048-5126															
Cmte. Designation: B (LOBBYIST/REGISTRANT PAC)															
Filing Frequency: MONTHLY FILER															

No records were found for this cycle.

Form Tp	Rpt Tp	AI	Recpt Dt	Pgs	Begin Img#	Begin Img#	Beg Cvg Dt	End Cvg Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
O-Index (2011-2012)															
Treasurer Name: SPIES, CHARLES R.															
Cmte. ID: C00571372															
Cmte. Name: RIGHT TO RISE USA															
Address: 6230 WILSHIRE BLVD. PMB 1790, LOS ANGELES, CA 90048-5126															
Cmte. Designation: B (LOBBYIST/REGISTRANT PAC)															
Filing Frequency: MONTHLY FILER															

No records were found for this cycle.

**Right to Rise USA (C00571372)**  
**Overview of Missing Information- 48-Hour Reports**

**A. 48-Hour Report, received October 23, 2015 (Image 201510239003239900)**

Name of Payee	Dissemination Date	Amount	Candidate
McCarthy Hennings Whalen, Inc.	10/21/15	\$20,516.10	Jeb Bush
Oath Strategies LLC	10/21/15	\$1,333,434.00	Jeb Bush
	<b>Total</b>	<b>\$1,353,950.10</b>	

**B. 48-Hour Report, received November 7, 2015 (Image 201511079003294525)**

Name of Payee	Dissemination Date	Amount	Candidate
McCarthy Hennings Whalen, Inc.	11/05/15	\$18,932.47	Jeb Bush
	<b>Total</b>	<b>\$18,932.47</b>	

**C. 48-Hour Report, received November 7, 2015 (Image 201511079003294524)**

Name of Payee	Dissemination Date	Amount	Candidate
Oath Strategies LLC	11/05/15	\$6,666,566.00	Jeb Bush
	<b>Total</b>	<b>\$6,666,566.00</b>	

**D. 48-Hour Report, received November 12, 2015 (Image 201511129003334960)**

Name of Payee	Dissemination Date	Amount	Candidate
McCarthy Hennings Whalen, Inc.	11/10/15	\$5,923.34	Jeb Bush
	<b>Total</b>	<b>\$5,923.34</b>	

**E. 48-Hour Report, received November 26, 2015 (Image 201511269004120147)**

Name of Payee	Dissemination Date	Amount	Candidate
McCarthy Hennings Whalen, Inc	11/24/15	\$3,183.36	Jeb Bush
	<b>Total</b>	<b>\$3,183.36</b>	

**F. 48-Hour Report, received December 2, 2015 (Image 201512029004144406)**

Name of Payee	Dissemination Date	Amount	Candidate

Oath Strategies LLC	11/30/15	\$227,685.83	Jeb Bush
	<b>Total</b>	<b>\$227,685.83</b>	

G. 48-Hour Report, received December 10, 2015 (Image 201512109004171502)

Name of Payee	Dissemination Date	Amount	Candidate
McCarthy Hennings Whalen, Inc	12/08/15	\$4,236.24	Jeb Bush
	<b>Total</b>	<b>\$4,236.24</b>	

H. 48-Hour Report, received December 10, 2015 (Image 201512109004171505)

Name of Payee	Dissemination Date	Amount	Candidate
McCarthy Hennings Whalen, Inc	12/08/15	\$5,917.84	Jeb Bush
	<b>Total</b>	<b>\$5,917.84</b>	

I. 48-Hour Report, received December 20, 2015 (Image 201512209004400846)

Name of Payee	Dissemination Date	Amount	Candidate
McCarthy Hennings Whalen, Inc.	12/18/15	\$4,172.97	Jeb Bush
	<b>Total</b>	<b>\$4,172.97</b>	

J. 48-Hour Report, received December 23, 2015 (Image 201512239004414588)

Name of Payee	Dissemination Date	Amount	Candidate
McCarthy Hennings Whalen, Inc	12/21/15	\$2,806.17	Jeb Bush
	<b>Total</b>	<b>\$2,806.17</b>	

K. 48-Hour Report, received January 7, 2016 (Image 20160107900443089)

Name of Payee	Dissemination Date	Amount	Candidate
Oath Strategies LLC	1/05/16	\$4,125,000.00	Jeb Bush
	<b>Total</b>	<b>\$4,125,000.00</b>	

L. 48-Hour Report, received January 9, 2016 (Image 201601099004446121)

Name of Payee	Dissemination Date	Amount	Candidate

Revolution Agency	1/07/16	\$9,783.50	Marco Rubio
	<b>Total</b>	<b>\$9,783.50</b>	

M. 48-Hour Report, received January 13, 2016 (Image 201601139004483300)

Name of Payee	Dissemination Date	Amount	Candidate
Revolution Agency	1/11/16	\$13,601.00	Marco Rubio
	<b>Total</b>	<b>\$13,601.00</b>	

N. 48-Hour Report, received January 23, 2016 (Image 201601239004570258)

Name of Payee	Dissemination Date	Amount	Candidate
McCarthy Hennings Whalen, Inc	1/21/16	\$7,793.43	Marco Rubio
	<b>Total</b>	<b>\$7,793.43</b>	

O. 48-Hour Report, received February 3, 2016 (Image 201602039008437507)

Name of Payee	Dissemination Date	Amount	Candidate
Oath Strategies LLC	2/01/16	\$791,519.50	Jeb Bush
	<b>Total</b>	<b>\$791,519.50</b>	

P. 48-Hour Report, received February 4, 2016 (Image 201602049008439749)

Name of Payee	Dissemination Date	Amount	Candidate
Revolution Agency	2/02/16	\$10,123.25	Jeb Bush
	<b>Total</b>	<b>\$10,123.25</b>	

Q. 48-Hour Report, received February 12, 2016 (Image 201602129008458213)

Name of Payee	Dissemination Date	Amount	Candidate
Oath Strategies LLC	1/18/16	\$2,200,000.00	Jeb Bush
	<b>Total</b>	<b>\$2,200,000.00</b>	

R. 48-Hour Report, received February 13, 2016 (Image 201602139008458545)

Name of Payee	Dissemination Date	Amount	Candidate
Oath Strategies LLC	2/12/16	\$400,000.00	Jeb Bush

	<b>Total</b>	<b>\$400,000.00</b>	
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S. 48-Hour Report, received February 14, 2016 (Image 201602149008458615)

Name of Payee	Dissemination Date	Amount	Candidate
Revolution Agency	2/12/16	\$19,411.50	Donald Trump
	<b>Total</b>	<b>\$19,411.50</b>	

T. 48-Hour Report, received February 18, 2016 (Image 201602189008492077)

Name of Payee	Dissemination Date	Amount	Candidate
Oath Strategies LLC	2/16/16	\$250,000.00	Jeb Bush
	<b>Total</b>	<b>\$250,000.00</b>	

**Right to Rise USA (C00571372)**  
Overview of Missing Information- Schedule E

2015 Year-End Report, received January 31, 2016 (Images 201601319005191144-98)

Name of Payee	Dissemination Date	Amount	Candidate
OATH STRATEGIES LLC	10/21/2015	\$1,333,434.00	Jeb Bush
MCCARTHY HENNINGS WHALEN, INC.	10/21/2015	\$20,516.10	Jeb Bush
OATH STRATEGIES LLC	11/05/2015	\$6,666,566.00	Jeb Bush
MCCARTHY HENNINGS WHALEN, INC.	11/05/2015	\$18,932.47	Jeb Bush
MCCARTHY HENNINGS WHALEN, INC.	11/10/2015	\$5,923.34	Jeb Bush
MCCARTHY HENNINGS WHALEN, INC.	11/24/2015	\$3,183.36	Jeb Bush
OATH STRATEGIES LLC	11/30/2015	\$227,685.83	Jeb Bush
MCCARTHY HENNINGS WHALEN, INC.	12/08/2015	\$4,236.24	Jeb Bush
MCCARTHY HENNINGS WHALEN, INC.	12/08/2015	\$5,917.84	Jeb Bush
MCCARTHY HENNINGS WHALEN, INC.	12/18/2015	\$4,172.97	Jeb Bush
MCCARTHY HENNINGS WHALEN, INC.	12/21/2015	\$2,806.17	Jeb Bush
<b>Total</b>		<b>\$8,293,374.32</b>	

2016 February Monthly Report, received February 20, 2016  
(Images 201602209008574940-5009)

Name of Payee	Dissemination Date	Amount	Candidate
OATH STRATEGIES LLC	01/05/2016	\$4,125,000.00	Jeb Bush
REVOLUTION AGENCY	01/04/2016	\$3,110.00	Jeb Bush
REVOLUTION AGENCY	01/07/2016	\$9,783.50	Marco Rubio
REVOLUTION AGENCY	01/11/2016	\$13,601.00	Marco Rubio
OATH STRATEGIES LLC	01/18/2016	\$2,200,000.00	Jeb Bush
MCCARTHY HENNINGS WHALEN, INC.	01/21/2016	\$7,793.43	Marco Rubio
<b>Total</b>		<b>\$6,359,287.93</b>	

2016 March Monthly Report, received March 20, 2016 (Images 201603209011682497-563)

Name of Payee	Dissemination Date	Amount	Candidate
OATH STRATEGIES LLC	02/01/2016	\$791,519.50	Jeb Bush

REVOLUTION AGENCY	02/02/2016	\$10,123.25	Jeb Bush
OATH STRATEGIES LLC	02/12/2016	\$400,000.00	Jeb Bush
REVOLUTION AGENCY	02/12/2016	\$19,411.50	Donald Trump
OATH STRATEGIES LLC	02/16/2016	\$250,000.00	Jeb Bush
<b>Total</b>		<b>\$1,471,054.25</b>	

**Right to Rise USA (C00571372)**  
**48-Hour Reports Not Filed<sup>3</sup>**

2015 Year-End Report, received January 31, 2016 (Image 201601319005190742)

Name of Payee	Date of Expenditure (Schedule E)	Expenditure Amount	Candidate Supported	State and Date of Election in which Disseminated
REVOLUTION AGENCY	11/1/2015	\$4,117.65	Jeb Bush	AL-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$22.66	Jeb Bush	AL-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$24.77	Jeb Bush	AL-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/17/2015	\$1.54	Jeb Bush	AL-2016 Primary (3/1/16)
MCCARTHY HENNINGS WHALEN INC.	11/17/2015 <i>(48-Hour Report Required)</i>	\$7.91	Jeb Bush	AL-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/1/2015	\$4,117.65	Jeb Bush	AR-2016 Primary (3/1/16)

<sup>3</sup> The Committee failed to file 48-Hour Reports for Presidential primary elections in ten (10) states; however, since the 48-Hour Reports were due on the same day, November 17, 2015, the referral only cites the Committee for failing to file one (1) 48-Hour Report.

REVOLUTION AGENCY	11/9/2015	\$22.66	Jeb Bush	AR-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$24.77	Jeb Bush	AR-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/17/2015	\$1.53	Jeb Bush	AR-2016 Primary (3/1/16)
MCCARTHY HENNINGS WHALEN INC.	11/17/2015 <i>(48-Hour Report Required)</i>	\$7.91	Jeb Bush	AR-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/1/2015	\$4,117.65	Jeb Bush	GA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$22.66	Jeb Bush	GA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$24.77	Jeb Bush	GA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/17/2015	\$1.53	Jeb Bush	GA-2016 Primary (3/1/16)

MCCARTHY HENNINGS WHALEN INC.	11/17/2015 <i>(48-Hour Report Required)</i>	\$7.91	Jeb Bush	GA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/1/2015	\$4,117.65	Jeb Bush	MA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$22.66	Jeb Bush	MA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$24.77	Jeb Bush	MA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/17/2015	\$1.53	Jeb Bush	MA-2016 Primary (3/1/16)
MCCARTHY HENNINGS WHALEN INC.	11/17/2015 <i>(48-Hour Report Required)</i>	\$7.91	Jeb Bush	MA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/1/2015	\$4,117.65	Jeb Bush	MI-2016 Primary (3/8/16)
REVOLUTION AGENCY	11/9/2015	\$22.66	Jeb Bush	MI-2016 Primary (3/8/16)

REVOLUTION AGENCY	11/9/2015	\$24.76	Jeb Bush	MI-2016 Primary (3/8/16)
REVOLUTION AGENCY	11/17/2015	\$1.53	Jeb Bush	MI-2016 Primary (3/8/16)
MCCARTHY HENNINGS WHALEN INC.	11/17/2015 <i>(48-Hour Report Required)</i>	\$7.91	Jeb Bush	MI-2016 Primary (3/8/16)
REVOLUTION AGENCY	11/1/2015	\$4,117.65	Jeb Bush	OK-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$22.66	Jeb Bush	OK-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$24.77	Jeb Bush	OK-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/17/2015	\$1.53	Jeb Bush	OK-2016 Primary (3/1/16)
MCCARTHY HENNINGS WHALEN INC.	11/17/2015 <i>(48-Hour Report Required)</i>	\$7.91	Jeb Bush	OK-2016 Primary (3/1/16)

REVOLUTION AGENCY	11/1/2015	\$4,117.65	Jeb Bush	TN-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$22.66	Jeb Bush	TN-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$24.77	Jeb Bush	TN-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/17/2015	\$1.53	Jeb Bush	TN-2016 Primary (3/1/16)
MCCARTHY HENNINGS WHALEN INC.	11/17/2015 <i>(48-Hour Report Required)</i>	\$7.91	Jeb Bush	TN-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/1/2015	\$4,117.65	Jeb Bush	TX-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$22.66	Jeb Bush	TX-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$24.76	Jeb Bush	TX-2016 Primary (3/1/16)

REVOLUTION AGENCY	11/17/2015	\$1.53	Jeb Bush	TX-2016 Primary (3/1/16)
MCCARTHY HENNINGS WHALEN INC.	11/17/2015 <i>(48-Hour Report Required)</i>	\$7.91	Jeb Bush	TX-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/1/2015	\$4,117.65	Jeb Bush	VA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$22.66	Jeb Bush	VA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$24.76	Jeb Bush	VA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/17/2015	\$1.53	Jeb Bush	VA-2016 Primary (3/1/16)
MCCARTHY HENNINGS WHALEN INC.	11/17/2015 <i>(48-Hour Report Required)</i>	\$7.91	Jeb Bush	VA-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/1/2015	\$4,117.65	Jeb Bush	VT-2016 Primary (3/1/16)

REVOLUTION AGENCY	11/9/2015	\$22.66	Jeb Bush	VT-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/9/2015	\$24.76	Jeb Bush	VT-2016 Primary (3/1/16)
REVOLUTION AGENCY	11/17/2015	\$1.53	Jeb Bush	VT-2016 Primary (3/1/16)
MCCARTHY HENNINGS WHALEN INC.	11/17/2015 <i>(48-Hour Report Required)</i>	\$7.91	Jeb Bush	VT-2016 Primary (3/1/16)
	<b>TOTAL</b>	<b>\$41,745.17</b>		