

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)¹ 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

¹ 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) RFAs were sent to the Committee referencing the 48-Hour Reports of Independent Expenditures, received December 10, 2015. The RFAs 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) RFAs were sent to the Committee referencing the 48-Hour Reports of Independent Expenditures, received December 20, 2015 and December 23, 2015. The RFAs 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 RFAs 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) RFAs 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 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 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

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)² 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

² 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,

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.

O-Index (2015-2016)													
Cmte. ID: C00571372 Cmte. Name: RIGHT TO RISE USA													
Treasurer Name: SPIES, CHARLES R. Address: 6230 WILSHIRE BLVD. PMB 1790, LOS ANGELES, CA 90048-5126													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: B (LOBBYIST/REGISTRANT PAC) Filing Frequency: MONTHLY FILER													
Form T	Rpt Tp	Alt	Recpt Dt	Pgs	Begin Img#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits & Loans
MS-T			10/27/2015	1	201510279003244108								
MS-T			12/17/2015	1	201512179004293865								
MS-T			1/4/2016	1	201601049004430868								
MS-T			1/4/2016	1	201601049004430869								
MS-M			1/8/2016	1	201601089004443835								
MS-Q			1/11/2016	1	201601119004470185								
MS-T			1/12/2016	2	201601120300008347								
MS-T			1/19/2016	1	201601199004527478								
MS-T			1/19/2016	1	201601199004527479								
MS-T			1/19/2016	1	201601199004527480								
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MS-T			3/7/2016	1	201603079009861965								
MS-T			3/7/2016	1	201603079009861967								
MS-T			3/7/2016	1	201603079009861968								
MS-T			3/7/2016	1	201603079009861969								
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MS-T			4/5/2016	1	201604059012225059								
MS-T			5/18/2016	1	201605189015534797								
MS-T			6/22/2016	1	20160622900980889								
RQ2	48		1/18/2016	3	201601180300009465			1/18/2016					
RQ2	48		1/18/2016	3	201601180300009468			1/18/2016					
RQ2	48		1/31/2016	3	201601310300009698			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	20151120300007727			11/12/2015					
RQ2	48		12/8/2015	3	201512080300008470			12/8/2015					
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	201603010300038939			3/1/2016					
RQ2	24		3/1/2016	3	201603010300038942			3/1/2016					
RQ2	48		3/1/2016	3	201603010300038945			3/1/2016					
RQ2	48		3/1/2016	3	201603010300038966			3/1/2016					
RQ2	48		11/30/2015	3	201511300300008340			11/30/2015					
RQ2	48		11/30/2015	3	201511300300008343			11/30/2015					
RQ2	48		11/30/2015	3	201511300300008346			11/30/2015					
RQ2	48		12/13/2015	3	201512130300008751			12/13/2015					
RQ2	MY	A	9/22/2015	5	201509220300005044		11/1/2015	6/30/2015					

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Attachment 1

[illegible]

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Attachment I

[illegible]

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Attachment 1

F24N	48	10/25/2015	1	201510250003240343	-	-	-	-	-
F24N	48	10/22/2015	1	201510220003218682	-	-	-	-	-
F24N	48	10/30/2015	2	201510300003260000	-	-	-	-	-
F24N	48	10/30/2015	1	201510300003260005	-	-	-	-	-
F24N	48	12/12/2015	9	201512120004175973	-	-	-	-	-
F24N	48	12/12/2015	1	201512120004175982	-	-	-	-	-
F24N	48	12/16/2015	1	201512160004233065	-	-	-	-	-
F24N	48	12/17/2015	1	201512170004152373	-	-	-	-	-
F24N	48	12/17/2015	2	201512170004152376	-	-	-	-	-
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F24N	48	12/17/2015	2	201512170004152380	-	-	-	-	-
F24N	48	12/14/2015	1	201512140004184786	-	-	-	-	-
F24N	48	12/9/2015	1	201512090004159086	-	-	-	-	-
F24N	48	12/17/2015	1	201512170004233828	-	-	-	-	-
F24N	48	12/10/2015	1	201512100004171501	-	-	-	-	-
F24N	48	12/10/2015	3	201512100004171502	-	-	-	-	-
F24N	48	12/10/2015	3	201512100004171505	-	-	-	-	-
F24N	48	12/23/2015	3	20151223000414586	-	-	-	-	-
F24N	48	12/23/2015	1	20151223000414589	-	-	-	-	-
F24N	48	12/23/2015	1	20151223000414595	-	-	-	-	-
F24N	48	12/24/2015	1	20151224000414785	-	-	-	-	-
F24N	48	12/24/2015	1	20151224000414822	-	-	-	-	-
F24N	48	12/24/2015	1	20151224000414840	-	-	-	-	-
F24N	48	12/20/2015	2	20151220000400842	-	-	-	-	-
F24N	48	12/20/2015	3	20151220000400844	-	-	-	-	-
F24N	48	12/18/2015	2	201512180004388121	-	-	-	-	-
F24N	48	12/19/2015	1	201512190004389790	-	-	-	-	-
F24N	48	12/30/2015	1	20151230000425517	-	-	-	-	-
F24N	48	12/30/2015	1	20151230000425518	-	-	-	-	-
F24N	48	12/30/2015	1	20151230000425519	-	-	-	-	-
F24N	48	12/30/2015	1	20151230000425520	-	-	-	-	-
F24N	48	12/4/2015	3	20151204000417600	-	-	-	-	-
F24N	48	12/5/2015	1	201512050004149364	-	-	-	-	-
F24N	48	12/3/2015	2	201512030004146139	-	-	-	-	-
F24N	48	12/3/2015	2	201512030004146141	-	-	-	-	-
F24N	48	12/3/2015	9	201512030004146143	-	-	-	-	-
F24N	48	12/3/2015	9	201512030004146152	-	-	-	-	-
F24N	48	12/3/2015	9	201512030004146161	-	-	-	-	-
F24N	24	1/29/2016	1	201601290004940390	-	-	-	-	-
F24N	48	1/29/2016	1	201601290004940391	-	-	-	-	-
F24N	48	1/29/2016	1	201601290004940392	-	-	-	-	-
F24N	24	1/29/2016	1	201601290004940445	-	-	-	-	-
F24N	24	1/29/2016	1	201601290004940472	-	-	-	-	-
F24N	48	1/29/2016	1	201601290004940525	-	-	-	-	-
F24N	24	1/29/2016	1	201601290004940552	-	-	-	-	-
F24N	24	1/29/2016	1	201601290004940553	-	-	-	-	-
F24N	24	1/29/2016	1	201601290004940554	-	-	-	-	-
F24N	24	1/29/2016	1	201601290004940555	-	-	-	-	-
F24N	24	1/27/2016	1	201601270004663105	-	-	-	-	-
F24N	24	1/27/2016	1	201601270004663106	-	-	-	-	-
F24N	48	1/27/2016	1	201601270004663107	-	-	-	-	-
F24N	24	1/27/2016	1	201601270004663108	-	-	-	-	-

F24N	24		1/27/2016	1	2016012790048653109	-	-	-	-
F24N	24		1/28/2016	1	201601289004703913	-	-	-	-
F24N	24		1/28/2016	1	201601289004703914	-	-	-	-
F24N	24		1/28/2016	1	201601289004703915	-	-	-	-
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	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	201602039008437489	-	-	-	-
F24N	24		2/3/2016	1	201602039008437499	-	-	-	-
F24N	24		2/3/2016	1	201602039008437505	-	-	-	-
F24N	48		2/3/2016	1	201602039008437507	-	-	-	-
F24N	24		2/3/2016	1	201602039008437508	-	-	-	-
F24N	24		2/3/2016	1	201602039008437510	-	-	-	-
F24N	24		2/3/2016	1	201602039008437511	-	-	-	-
F24A	24		2/3/2016	1	201602039008437522	-	-	-	-
F24A	24		2/3/2016	1	201602039008437528	-	-	-	-
F24N	48		7/12/2015	1	201507129000088304	-	-	-	-
F24N	48		7/16/2015	1	201507169000248925	-	-	-	-
F24N	48		8/23/2015	2	201508239000927513	-	-	-	-
F24N	48		8/21/2015	2	201508219000927074	-	-	-	-
F24N	48		8/23/2015	1	201508239000927563	-	-	-	-
F24A	48		8/23/2015	2	201508239000927571	-	-	-	-
F24N	48		9/10/2015	2	201509109001633656	-	-	-	-
F24N	48		9/17/2015	2	201509179002698195	-	-	-	-
F24N	48		9/17/2015	1	201509179002698197	-	-	-	-
F24N	48		9/17/2015	2	201509179002698198	-	-	-	-
F24N	48		10/15/2015	1	201510159003054190	-	-	-	-
F24N	48		10/15/2015	1	201510159003054594	-	-	-	-
F24N	48		10/19/2015	1	201510199003103176	-	-	-	-
F24N	48		1/11/2015	2	20151119003305382	-	-	-	-
F24N	48		1/11/2015	4	20151119003305384	-	-	-	-
F24N	48		1/11/2015	4	20151119003305388	-	-	-	-
F24N	48		1/19/2015	1	201511199003396364	-	-	-	-
F24N	48		1/19/2015	4	201511199003398365	-	-	-	-
F24N	48		1/19/2015	4	201511199003398369	-	-	-	-
F24N	48		1/16/2015	1	201511169003351252	-	-	-	-

O-Index (2013-2014)																													
Cmte. ID: C00574372													Cmte. Name: RIGHT TO RISE USA																
Treasurer Name: SPIES, CHARLES R													Address: 6230 WILSHIRE BLVD, PMB 4790, LOS ANGELES, CA 90048-5126																
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE)													Cmte. Designation: B (LOBBYIST/REGISTRANT PAC)																
Filing Frequency: MONTHLY FILER																													
Form	Tr	Rpt	Tr	A/I	Recpt	Tr	Pas	Beq	Tr	Beq	Tr	End	Cva	Tr	Ltrr	Tr	Beq	Tr	Beq	Tr	End	Cva	Tr	Disb	End	Cash	Debits	Loans	Debits & Loans

Form To	Rot To	All	Recat Dt	Pos	Begin Inq#	Bea Cva Dt	End Cva Dt	Ltr Mail Dt	Begin Cash	Recpts	Dish	End Cash	Debits	Loans	Debits & Loans
<p> Treasurer Name: SPIES, CHARLES R Address: 6230 WILSHIRE BLVD, PMB 1790, LOS ANGELES, CA 90048-5126 Cmte. ID: C00571372 Cmte. Name: RIGHT TO RISE USA Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: B (LOBBYIST/REGISTRANT PAC) Filing Frequency: MONTHLY FILER </p>															
<p>O-Index (2011-2012)</p>															

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
	Total	\$1,353,950.10	

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
	Total	\$18,932.47	

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
	Total	\$6,666,566.00	

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
	Total	\$5,923.34	

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
	Total	\$3,183.36	

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

Name of Payee	Dissemination Date	Amount	Candidate
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Oath Strategies LLC	11/30/15	\$227,685.83	Jeb Bush
	Total	\$227,685.83	

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
	Total	\$4,236.24	

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
	Total	\$5,917.84	

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
	Total	\$4,172.97	

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
	Total	\$2,806.17	

K. 48-Hour Report, received January 7, 2016 (Image 201601079004443089)

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

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

Name of Payee	Dissemination Date	Amount	Candidate
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Revolution Agency	1/07/16	\$9,783.50	Marco Rubio
	Total	\$9,783.50	

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
	Total	\$13,601.00	

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
	Total	\$7,793.43	

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
	Total	\$791,519.50	

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
	Total	\$10,123.25	

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
	Total	\$2,200,000.00	

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

	Total	\$400,000.00	
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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
	Total	\$19,411.50	

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
	Total	\$250,000.00	

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
	Total	\$8,293,374.32	

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
	Total	\$6,359,287.93	

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
	Total	\$1,471,054.25	

Right to Rise USA (C00571372)
48-Hour Reports Not Filed³

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 (48-Hour Report Required)	\$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)

³ 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 (48-Hour Report Required)	\$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 (48-Hour Report Required)	\$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 (48-Hour Report Required)	\$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 (48-Hour Report Required)	\$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 (48-Hour Report Required)	\$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 (48-Hour Report Required)	\$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 (48-Hour Report Required)	\$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 (48-Hour Report Required)	\$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 (48-Hour Report Required)	\$7.91	Jeb Bush	VT-2016 Primary (3/1/16)
	TOTAL	\$41,745.17		