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December 22, 2016

Jeff S. Jordan
Assistant General Counsel
Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E Street, NW
Washington, DC 20463

Re: MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188

Dear Mr. Jordan:

In response to the complaints filed by the Foundation for Accountability and Civic Trust ("FACT" or the "Complainant"), we write as counsel to DCCC and Kelly Ward in her official capacity as treasurer in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7178, 7179, 7182, 7187, and 7188 (collectively, the "Complaints"); Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer, in MUR 7169; Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7170; Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity as treasurer, in MUR 7171; Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7172; Applegate for Congress and Douglas Applegate, in his official capacity as treasurer, in MUR 7173; Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer, in MUR 7174; Texans for Pete and Wayne Alexander, in his official capacity as treasurer, in MUR 7175; Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7176; Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer, in MUR 7177; Eggman for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7178; Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7179; Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer, in MUR 7182; Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer, in MUR 7187; and LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7188 (collectively, "Respondents" and individually, each a "Respondent").

INTRODUCTION

These Complaints involve advertisements paid for by the DCCC that supported the election of the named Democratic congressional candidates, and that also opposed the

election, actions, or policies of Donald J. Trump, the Republican candidate for President. The Complaints present three legal issues, none of which is new or complicated: (1) whether the DCCC properly attributed the costs of the advertisements among the multiple candidates appearing in them according to 11 C.F.R. § 106.1(a); (2) whether the DCCC correctly accounted for the portion of the expenses attributed to Donald Trump; and (3) whether the DCCC and the congressional campaigns refrained from coordinating the ads with Hillary for America ("HFA"), so that none of their costs would represent in-kind contributions to HFA.

Because the answer to each of these questions is yes, there is no reason to believe Respondents violated the Federal Election Campaign Act of 1971, as amended (the "Act") or the regulations of the Federal Election Commission (the "FEC" or "Commission"):

First, the DCCC followed the process mandated by Commission regulations and long-standing Commission authority and attributed the cost of the advertisements among the multiple candidates appearing in them on a time-space basis, "according to the benefit reasonably expected to be derived." The Complaints ignore clear Commission authority requiring attribution among multiple candidates in this case of advertisements like these and present no facts to show that any attribution was done incorrectly. Instead, relying solely on one inaccurate news article, they simply assume that the advertisements were misattributed under the concept of "hybrid advertising" based on a generic party reference, which was not the case. These advertisements simply present a text book example of appropriately attributing expenditures under 11 C.F.R. § 106.1(a).

Second, the facts show that the DCCC correctly accounted for and reported the expenses attributable to Donald Trump. Some of the advertisements expressly advocated Trump's defeat, while others did not. The first were reported as independent expenditures, while the second were not, according to the Act and Commission regulations.³

Moreover, as a national party committee, the DCCC had an interest both in urging Donald Trump's defeat and criticizing his policies, above and beyond its central mission of supporting House candidates. Donald Trump was at the top of the ticket and the face of the Republican Party. He advocated policies and took actions strongly opposed by Democratic Party adherents. By expressly advocating Donald Trump's defeat, and by criticizing policy positions he espoused, that were strongly identified with him in the public mind, the DCCC alternatively promoted his defeat and mobilized Democratic opposition to his policies, the latter of which also helped support the ticket as a whole.

Third, none of the advertisements at issue was coordinated with HFA. In fact, the DCCC and campaigns took specific steps to avoid coordination with HFA. The Complaints present no facts to support any claim of coordination, but simply assume that it must have

¹¹¹ C.F.R. § 106.1(a)(1).

² See Scott Bland, Dems use loophole to pump millions into fight for the House, Politico, Oct. 18, 2016, http://www.politico.com/story/2016/10/democrats-house-campaign-money-229957.

³ See 11 C.F.R. § 100.16(a) (linking definition of "independent expenditure" to express advocacy).

occurred because a party committee was involved in the advertisements—a presumption that the Supreme Court struck down long ago.⁴

The only factor that makes the resolution of these matters in any way complicated is the Complainant itself. As it has done before, FACT has flooded the Commission with fourteen complaints involving a wide array of respondents, in a clear effort to drain Respondents' resources and burden the Commission, with the ultimate effect of chilling speech and impeding the progress of other, non-frivolous enforcement matters. FACT relied on a single news article to "support" its conclusory allegations and focused the entire Complaints on generic party hybrid advertising that never occurred. The Complaints even carelessly swept up two ads that were attributed entirely to the relevant House campaigns and paid for completely with campaign funds and with coordinated party expenditure authority.

The Respondents complied with longstanding Commission regulations to support and oppose multiple candidates and promote the party as a whole. Because the costs were correctly attributed among multiple candidates, because the ads were correctly reported, and because there was no prohibited coordination with HFA, there is no reason to believe that any violation occurred, and the FEC should immediately dismiss these Complaints.

FACTS

The DCCC is the House campaign committee of the Democratic Party. Its principal mission is to support Democratic congressional candidates and other candidates around the country. In 2016, as before, a key part of the DCCC's activities involved financing television advertisements. Under Commission rules, the legal treatment of these advertisements varies by content—for example, whether they identify clearly identified candidates and, if so, how many; whether they expressly advocate the candidates' election or defeat; and whether they are coordinated with those candidates. The DCCC has had a long history of not simply making coordinated expenditures in support of House campaigns, but using communications to promote the interests of the Democratic Party as a whole.

The presidential candidacy of Donald Trump provided the DCCC with a unique opportunity to promote Democratic House candidates, oppose Trump's election, and mobilize the Democratic Party against Trump's positions for the benefit of the whole ticket. Trump was a major issue in House campaigns, his defeat was a vital concern for Democratic adherents, and fighting back against his policy positions and actions was important to the party as a whole. The DCCC saw the opportunity to pursue all three of these objectives.

⁴ See Colorado Republican Fed. Campaign Comm. v. FEC, 518 U.S. 604, 614-15 (1996) (invalidating prohibition on party independent expenditures); McConnell v. FEC, 540 U.S. 93, 214 (2003), overruled in part on other grounds by Citizens United v. FEC, 558 U.S. 310 (2010) (invalidating requirement that party choose between making independent or coordinated expenditures).

See FEC MUR 6916, First General Counsel's Report (Oct. 22, 2015).

⁶ Sec, e.g., 11 C.F.R. § 110.2(c)(2)(ii).

⁷ See, e.g., FEC Advisory Opinion 1985-14 (DCCC).

These Complaints are about advertisements that the DCCC undertook in service of these multiple objectives. Supervised by a senior DCCC employee, DCCC staff worked with House campaigns to develop and produce the advertisements beginning with script development through the advertising buying phase. 8 Each of the advertisements involved explicit references to clearly identified House candidates and a clearly identified discussion of Donald Trump and were accounted for according to the following model:

- Some of the advertisements expressly advocated the defeat of both the Republican House candidate and Trump. (e.g., "Vote No on [Republican congressional candidate] and Donald Trump"). In these cases, the DCCC paid for and reported the portion of the advertisement attributable to Trump as an independent expenditure opposing him. The remainder was either paid entirely by the Democratic congressional campaign, or split between the campaign and the DCCC, with the DCCC treating its share of the remainder as a coordinated expenditure. Advertisements that included express advocacy against Donald Trump are discussed in MURs 7169, 7170, 7171, 7174, 7176, and 7182.10
- Other ads mentioned both House candidates and Donald Trump, but did not expressly advocate Trump's defeat. Rather, these ads focused on Trump's positions on key issues like national security, immigration, women's health, or gun control and his actions causing unrest and harm to the country. In these cases, the portion of the advertisements that concerned congressional candidates was either paid in whole by the Democratic House campaign, or split between the campaign and the DCCC using funds available under the coordinated party expenditure limits.11 The remainder was paid for by the DCCC and reported as an operating expense. The ads that did not expressly advocate Trump's defeat are discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188.12

In all of these advertisements, the DCCC attributed the relevant expenses between the referenced candidates—i.e., the House candidate and Donald Trump—on a time/space basis,

⁸ See Exhibit A (affidavit of Michael lan Russell)..

⁹ See Exhibit B (relevant pages of FEC reports).

The advertisement in MUR 7169 can be found here: https://www.youtube.com/watch?v=7mb2DsowG00. The advertisement in MUR 7170 can be found here: https://www.youtubc.com/watch?v=ulkmwN7ivMU. The advertisement in MUR 7171 can be found here: https://www.youtube.com/watch?v=LS-gU95vm9U. The advertisement in MUR 7174 can be found here: https://www.youtube.com/watch?v=g_4kBjw8r-U. The advertisement in MUR 7176 can be found here: https://www.youtube.com/watch?v=WCx3ObETyrE. The advertisement in MUR 7182 can be found here: https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

11 See Exhibit B.

¹² The advertisement in MUR 7172 can be found here: https://www.youtube.com/watch?v=nwdljKSaFdQ. The advertisement in MUR 7175 can be found here: https://www.youtubc.com/watch?v=GJCZwJ3tYXw. The advertisement in MUR 7177 can be found here:

https://www.youtube.com/watch?v=7KxcnucjChU&feature=youtu.be. The advertisement in MUR 7178 can be found here: https://www.youtube.com/watch?v=H1xNUxf-t80. The advertisement in MUR 7179 can be found here: https://www.youtube.com/watch?y=OpdllznhrF4. The advertisement in MUR 7188 can be found here: https://www.youtube.com/watch?v=epFwW3WyQWo. For the advertisement in MUR 7177, the Colorado Democratic Party similarly split the costs of the advertisement with Carroll for Colorado on a time/space basis.

determining the portion of each ad that related to each candidate and allocating accordingly. As mentioned above, two of the Complaints involved ads that were paid for entirely with campaign funds, and with DCCC funds used under the coordinated party expenditure limit.¹³

All of the advertisements discussed in the Complaints were conceived and executed by the DCCC independently of HFA or its agents. Because the ads would refer to Trump, the staff and campaigns were instructed not to coordinate them with HFA or its agents. The Complaints make no specific allegation of coordination whatsoever, and the declarations accompanying this response demonstrate the absence of any request, suggestion, assent, substantial discussion or material involvement. The declarations demonstrate also that there was no coordination through any common vendor, former employee or independent contractor.

LEGAL ANALYSIS

- I. The Costs of the Advertisements Were Properly Attributed Among Multiple Candidates According to the Benefit Reasonably Expected to Be Derived
 - A. Commission rules clearly provide for attribution among multiple candidates.

11 C.F.R. § 106.1(a) provides that "expenditures, including in-kind contributions, independent expenditures, and coordinated expenditures made on behalf of more than one clearly identified Federal candidate shall be attributed to each such candidate according to the benefit reasonably expected to be derived." For a television ad, the regulation is explicit about how to make this attribution: it "shall be determined by the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates." The Commission has repeatedly and consistently applied this regulation when evaluating communications that refer to multiple candidates. For example, when an advertisement identifies candidates in multiple races, the expenditure is attributed based on the time/space dedicated to each race (e.g., the time dedicated to advocating a congressional candidate and her opponent would be attributed separately from the time spent advocating for a presidential candidate). The portions of the broadcast communication that is dedicated to the legally

¹³ The advertisement in MUR 7173 can be found here: https://www.youtube.com/watch?v=RriiI]NAe-1. The advertisement in MUR 7187 can be found here: https://www.youtube.com/watch?v=8DNQEgLEECA. See Exhibit B

¹⁴ See Exhibit A.

¹⁵ Id.

¹⁶ Id.; see also Exhibit C (affidavit of media vendors).

¹⁷ The vast majority of vendors working on the ads at issue in these matters did not work for HFA. Two vendors who did work on two different advertisements also did work for HFA but did not use any non-public information about HFA's plans, projects, activities, or needs in working on the advertisement. See Exhibit C.

^{18 11} C.F.R. § 106.1(a).

¹⁹ Id.

²⁰ See FEC Adv. Op. 2010-10 (NRL PAC); FEC Adv. Op. 2004-37 (Waters) ("attribution shall be determined by the proportion of space devoted to each candidate") (citing 11 C.F.R. § 106.1(a)(1)).

²¹ FEC Adv. Op. 2010-10 (NRL PAC).

required disclaimer and "stand by your ad" messages do not count for either candidate, but rather are split proportionately to the rest of the communication's content.²²

In attributing the cost of a communication among multiple candidates, the Commission does not look to whether or not the segment associated with a particular candidate contains express advocacy. For example, in Advisory Opinion 2004-01, issued to Bush-Cheney '04, Inc. and Alice Forgy Kerr for Congress, the Commission understood that the ad would "not mention or refer to the President's candidacy for re-election [or] expressly advocate the election nor defeat of any presidential candidate." Still, the Commission confirmed that the costs of the communication must be attributed between the two campaigns based on the proportion of space or time devoted to each candidate under 11 C.F.R. § 106.1(a), even though the ad expressly advocated one candidate's election and not the other's. Similarly, in Advisory Opinion 2010-10, the Commission held that when a broadcast communication expressly advocated the election of one candidate, referred to an opposing candidate without expressly advocating defeat, and expressly advocated the election of a third candidate in an altogether different race, the references to the opposing candidate would be attributed to the first candidate under 11 C.F.R. § 106.1(a).

The Commission has applied section 106.1's attribution principles even when only one candidate is referenced but the ad concerned multiple purposes. For example, in Advisory Opinion 2004-29, the Commission allowed Representative Todd Akin to appear in an ad supporting a ballot issue committee, but advised his campaign only to "reimburse the sponsor of the advertisement for the attributable portion of the cost of these coordinated communications," despite the fact that no candidate besides Akin would appear in the ad. 26 And in Advisory Opinion 2006-11, the Commission considered a state party mailing that would expressly advocate for a federal candidate and for other generically referenced candidates of the party committee. 27 The Commission held that, while no less than 50% of the costs could reasonably be attributed to the one identified candidate, "it is appropriate to apply analogous 'space or time' principles set out in 11 C.F.R. 106.1(a)" and that "the benefit reasonably expected to be derived by the clearly identified candidate should be

²² Specifically, the Commission has advised that the disclaimer component of the communication should be attributed among the candidates or purposes "in the same proportion as the time or space" devoted to each race or purpose. FEC Adv. Op. 2010-10 (NRL PAC) at 6; see also FEC Adv. Op. 2007-09 (Kerry-Edwards) (permitting disclaimer to be attributed among multiple purposes). For instance, in NRL PAC, the FEC stated that, where 16 seconds of a 30-second advertisement are devoted to advocating for a presidential candidate, 8 seconds are devoted to advocating against a Senate candidate, and 6 seconds are devoted to a disclaimer, two-thirds of the expenditure should be reported as having been made in support of the presidential candidate and one-third should be reported as having been made in opposition to the Senate candidate. FEC Adv. Op. 2010-10 at 6 n.7. In Kerry-Edwards, the Commission found that the portion of broadcasting costs incurred by the Kerry-Edwards Campaign in complying with disclaimer requirements were expenses that may be paid for with legal funds. See FEC Adv. Op. 2007-09.

²³ FEC Adv. Op. 2004-01 (Bush/Kerr).

²⁴ Id. at 6. The Commission has since adopted a specific exemption from the coordination rules that vitiates the general attribution rule in the case of certain "endorsement" ads. See 11 C.F.R.§ 109.21(g). However, that exception is not at issue in these matters.

²⁵ FEC Adv. Op. 2010-10 (NRL PAC).

²⁶ FEC Adv. Op. 2004-29 (Akin) at 6.

²⁷ FEC Adv. Op. 2006-11 (Washington Democratic State Central Committee).

measured by determining the amount of space devoted to the clearly identified candidate as compared to the amount of space devoted to the generically referenced party candidates."28

Although the ads aired by Respondents are not so-called "hybrid" ads like those in Advisory Opinion 2006-11, the Commission has nonetheless found that ads that concern candidates, issues, and the party generally are allocated just like ads that concern multiple candidates. The Act "generally permit[s] (and in some cases require[s]) the allocation of expenses attributable to more than one purpose" and "allocation is an appropriate way to fund activities with multiple purposes" as held over and over by the Commission.²⁹ These ads that— in each case—referred to two candidates in two different elections, sometimes expressly advocating Trump's defeat and sometimes opposing his policy positions, were allocated in accordance with these longstanding Commission interpretations.

B. Respondents attributed the advertisements correctly.

The advertisements in MURs 7169, 7170, 7171, 7172, 7174, 7175, 7176, 7177, 7178, 7179, 7182, and 7188 were all correctly attributed among the Democratic House candidates and Donald Trump, just as 11 C.F.R. § 106.1(a) and Commission authority contemplate. The plain language of 11 C.F.R. § 106.1(a) requires that when an expenditure for a broadcast communication clearly identifies more than one Federal candidate, the costs shall be attributed as determined by "the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates." The FEC has additionally confirmed that when an advertisement mentions two opponents running for the same office and a third candidate for a different office, the costs are "allocated among the electoral races, based on a time or space analysis."30 This is how Respondents attributed the costs of these advertisements in this case.

All of the ads at issue referred to clearly identified House candidates and Donald Trump, a clearly identified presidential candidate running. The portions of the ads that were spent discussing the House candidates were attributed to the Democratic House candidate. Conversely, the portions of the ads that were spent discussing Trump were attributed to Trump. If a portion of an ad concerned both the House candidate and Trump, that period of time was attributed between the two races on a reasonable basis. The portion of each ad that was spent displaying the written, visual, and spoken disclaimer as mandated by law was allocated between the two races "in the same proportion as the time or space" devoted to each race in the other portions of the ad, just as the Commission instructed in Advisory Opinion 2010-10.

²⁸ Id. at 4.

²⁹ See FEC Adv. Op. 2010-14 (DSCC) (approving allocation of expense between campaign and recount activities); see also FEC Adv. Op. 1988-06 (Gore for President) (holding that "expenditures within the purview of the Act may be made for multiple purposes [and] the Commission believes that expenditures to run an advertisement which includes a fundraising solicitation may be allocated on a 'reasonable basis'"); First General Counsel's Report at 22, FEC Matter Under Review 4131(holding that multi-purpose mailers that include express advocacy of candidates and a solicitation for contributions to a state PAC should be allocated between the mixed purposes). 30 FEC Adv. Op. 2010-10 (NRL PAC).

Take, for example, the advertisement sponsored by the DCCC and Mowrer for Iowa at issue in MUR 7174. The advertisement contains express advocacy against Representative David Young and Donald Trump. The advertisement criticizes the positions of both Trump and Young and ends by saying, "Vote No on Donald Trump and David Young." The ad starts with approximately 5 seconds concerning Donald Trump and is followed by 4 seconds attributable to the House race, 5 seconds attributable to Trump, 4 seconds attributable to the House race, 3 seconds attributable to Trump, 5 seconds attributable to the House race, and finally 4 seconds containing the legally required disclaimer. The first 26 seconds of the advertisement were equally divided between the congressional race and Donald Trump and the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion. The advertisement was attributed 50% to the Mowrer campaign and 50% to Donald Trump.

Consider also the ad sponsored by the DCCC and Colleen Deacon for Congress at issue in MUR 7172.³² The ad critiques the positions of both Rep. John Katko and Donald Trump, but does not expressly advocate Trump's defeat. The ad starts with approximately 4 seconds equally attributable to both the House race and Trump and is followed by 2.5 seconds attributable to Trump, 3.5 seconds attributable to the House race, 8 seconds attributable to Trump, 7 seconds attributable to the House race, 3 seconds equally attributable to both the House race and Trump, and ends with 2 seconds dedicated to the disclaimer. The first 28 seconds of the advertisement were equally divided between the House race and Trump, the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion, and so the advertisement was attributed 50% to the Deacon campaign and 50% to Trump. The same methodology was used to attribute the ads generally, and the Complaints provide no basis to question Respondents' attribution.

The expenses attributed to the House candidates were correctly reported. C.

The portion of the ads attributable to the House candidates were paid for and reported as required by the Act and Commission regulations. In almost every case, and as reported to the Commission, the relevant Democratic House campaign directly paid the relevant media vendor for its attributable portion of the costs. In two cases—the ad sponsored by the DCCC and Nelson for Wisconsin in MUR 7171, and the ad sponsored by the DCCC and Shkreli for Congress in MUR 7176—the DCCC paid for some of the portion of the expenses that were attributable to the House campaign as a coordinated expenditure. For the Nelson campaign, the DCCC paid \$33,700 of the costs attributable to the campaign, and for the Shkreli ad, the DCCC paid \$52,960. These payments were well within the DCCC's coordinated party expenditure limits for each race and were reported to the Commission.³³ The Commission has repeatedly held that when a federal campaign pays for the portion of an advertisement

33 See Exhibit B.

³¹ Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016), https://www.youtube.com/watch?v=g_4kBjw8r-U.

³² Colleen Deacon, Unsettled, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0.

that is attributable to the relevant candidate under 11 C.F.R. § 106.1(a), no contribution · results from the payment of the remaining portion of the expenses for the advertising.³⁴

Contrary to FACT's speculative and unfounded allegations, the DCCC did not make any excessive contributions to any of the House campaigns, because the expenses attributable to those campaigns were either paid for by the campaigns themselves, or by the DCCC under its coordinated expenditure authority.

D. Two of the communications at issue were paid for entirely by the House campaigns and the DCCC as coordinated party expenditures.

For reasons known only to FACT, that organization filed two complaints regarding ads paid for entirely by the relevant Democratic House campaign and under the DCCC's coordinated party expenditure authority. Given the way that they were funded, these expenditures for these ads cannot possibly amount to excessive contributions from the DCCC to the House campaign. MUR 7173 concerns an ad sponsored by the DCCC and Applegate for Congress. The DCCC spent a total of \$91,200 to assist in the airing of this ad and Applegate for Congress paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward the ad were treated as coordinated party expenditures and reported accordingly.35

Similarly, MUR 7187 concerns an advertisement sponsored by the DCCC and Friends of Christina M. Hartman. The DCCC spent a total of \$96,070 to assist in the airing of this ad and Friends of Christina M. Hartman paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward this ad were treated as coordinated party expenditures and reported accordingly.³⁶

Thus, in MURs 7173 and 7187, not even the question of attribution was present. At no point was there any basis for FACT to allege any violation of the limits as to the House campaigns.

The Portions of the Ads Attributable to Donald Trump Were Correctly II. Reported

Except in MUR 7177, the portions of the ads referenced by the Complaints and attributable to Donald Trump were paid for by the DCCC. In MUR 7177, the portion of the ad attributable to Trump was paid for by the Colorado Democratic Party. In each case, the party committee either filed the necessary independent expenditure report as to Trump or

³⁴ See FEC Adv. Op. 2004-37 (Waters) at 2 (holing that payment for a "brochure would not constitute support of, or be an in-kind contribution to, the Federal candidates listed in the brochure, provided that the Federal candidates provide reimbursements in the appropriate amount in a timely manner"); FEC Adv. Op. 2004-01 (Bush/Kerr) at 6 (holding that "if the Bush-Cheney Committee reimburses the Kerr Committee for its attributable share of the expenses, there is no contribution"); FEC Adv. Op. 2004-29 (Akin).

35 See Exhibit B.

16 Id.

reported the attributable portion of the ad as operating expenditures, depending on whether the ad contained express advocacy.

To be an independent expenditure, a communication must include "express advocacy" for or against a "clearly identified" candidate.³⁷ However, although all of the relevant ads "clearly identified" Trump under 11 C.F.R. § 100.17, only the ads at issue in MURs 7169, 7170, 7171, 7174, 7176, and 7182 included "express advocacy" against him.³⁸ In these latter cases, the DCCC reported the portions of the ads attributable to Trump as independent expenditures opposing him.³⁹

The ads in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not expressly advocate Trump's defeat. Accordingly, the portions of these ads' costs that were attributable to Trump were reported by the party as operating expenditures and not as independent expenditures. The definition of "express advocacy" is clearly set forth in the Commission's regulations, and when a communication does not meet this definition, the Commission has repeatedly held that the communication does not constitute an independent expenditure. 40

A communication expressly advocates if it: uses phrases such as "vote for the President," "Smith for Congress," or "Bill McKay in '94," or uses campaign slogans or individual words, which in context "can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidates," such as a message saying "Nixon's the One," or "Carter '76," or when taken as a whole and with limited reference to external events, "could only be interpreted by a reasonable person as containing advocacy of the election or defeat" of a candidate because the "electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning" such that reasonable minds "could not differ as to whether it encourages actions to elect or defeat" the candidate. A message constitutes express advocacy "only if it contains a clear call to a specific electoral

³⁷ 11 C.F.R. §.100.16.

³⁸ Dangerous for PA Women, YouTube (Oct. 20, 2016) at :20 ("Say No To Donald Trump & Brian Fitzpatrick"), https://www.youtube.com/watch?v=7mb2DsowG00; Ruben Kihuen for Congress, Our Values, YouTube (Oct. 18, 2016) at :23 ("Vote NO on Cresent Hardy and Donald Trump"), https://www.youtube.com/watch?v=ulkmwN7ivMU; Nelson for Wisconsin, No, YouTube (Oct. 10, 2016) at :25 ("Mike Gallagher says we still have to support Donald Trump. No, we don't; we don't have to support Mike

^{(&}quot;Mike Gallagher says we still have to support Donald Trump. No, we don't; we don't have to support Mike Gallagher either"), https://www.youtube.com/watch?v=LS-gU95vin9U; Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016) at :28 ("Vote No on Donald Trump and David Young"),

https://www.youtube.com/watch?v=g_4kBjw8r-U; Suzanna Shkreli for Congress, Brags, YouTube (Oct. 14, 2016) at :22 ("Vote No on Donald Trump and Mike Bishop"), https://www.youtube.com/watch?v=WCx3ObETyrE; Bryan Caforio for Congress, Stand Up, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), https://www.youtube.com/watch?v=il8196BhyWn& footuge=woutube.

https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

39 See Exhibit D (excerpts from relevant independent expenditure reports). There would have been no basis to consider the portions of the advertisements attributable to Trump as coordinated communications with the House campaigns. See Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 431 (Jan. 3, 2003) (conduct standard cannot "be satisfied without some link between the request or suggestion and the candidate or political party who is, or that is, clearly identified in the communication").

⁴⁰ See, e.g., FEC Adv. Op. 1985-14 (DCCC).

^{41 11} C.F.R. § 100.22.

action."⁴² Even according to the Ninth Circuit, which has taken a very expansive approach to defining express advocacy:

Speech cannot be "express advocacy of the election or defeat of a clearly identified candidate" when reasonable minds could differ as to whether it encourages a vote for or against a candidate or encourages the reader to take some other kind of action. We emphasize that if any reasonable alternative reading of speech can be suggested, it cannot be express advocacy subject to the Act's disclosure requirements.⁴³

Even by this broad standard, the advertisements at issue in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not include any words of express advocacy regarding Trump. In each case, a reasonable alternative reading exists for the communication as it pertains to Trump, insofar as they criticize his policy positions and their negative effects.

Several of the advertisements discuss Republican congressional candidates "support" for Donald Trump's positions. For example, in the advertisement at issue in MUR 7172 the script is as follows:

VOICE OVER: In an unsettled world, John Katko and Donald Trump's approach takes us down a dangerous path. [Showing footage of global unrest].

TRUMP: "I love war in a certain way."

VOICE OVER: But when asked about supporting Trump, Katko said ...

KATKO: "I absolutely will support."

TRUMP: "Tell them to go f--- themselves."

VOICE OVER: When national security leaders condemn Trump's reckless statements on foreign policy...

INTERVIEWER: "People are wondering how those things can happen and you not flat out denounce it?"

KATKO: "I'm more concerned about my race."

VOICE OVER: Not about the safety of our families. Trump and Katko put our national security at risk.

[DISCLAIMER].44

⁴² Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 4, Matter Under Review 6113 (Dec. 18, 2009).

⁴³ FEC v. Furgatch, 807 F.2d 857, 864 (9th Cir. 1987).

⁴⁴ Colleen Deacon, Unsettled, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0.

However, the word "support" in this context cannot only be interpreted as a call to vote against Donald Trump. Rather, it is intended to critique Donald Trump's desire for war, dangerous foreign policy "approach," and other previous actions and policy positions and Representative Katko's support of Trump despite these positions. This advertisement concludes with the statement that "Trump and Katko put our national security at risk." The advertisement does not say that viewers should vote against Donald Trump for President but refers to the contemporaneous actions of both Representative Katko and Donald Trump that are adverse to the United States' national security interests.

Similarly, consider the advertisement at issue in MUR 7175. The script of advertisement is as follows:

TRUMP: We're going to build a wall.

VOICE OVER: Donald Trump is tearing us apart. [SHOWING CURRENT NATIONAL UNREST]. Trump called a judge unqualified because of his Mexican heritage.

TRUMP: He's a Mexican. We're building a wall between here and Mexico.

VOICE OVER: And called Mexicans rapists and murderers. Donald Trump. Too dangerous for us. But Will Hurd says he could still support Donald Trump. And Will Hurd shares the same bad ideas.

WILL HURD: A wall absolutely makes sense.

VOICE OVER: Will Hurd. He's the wrong choice for Texas families.

[DISCLAIMER].45

This advertisement refers to several statements and policy positions of Donald Trump and observes the contemporaneous effects: his positions and actions are "tearing us apart" at this time. The advertisement does not include a call to defeat Donald Trump in the presidential election, but it does include a call to defeat Representative Hurd: it says that he is the "wrong choice for Texas families" because of his support of Donald Trump's positions. Citing Representative Hurd's support for Donald Trump as a reason to defeat Representative Hurd is not express advocacy with regard to Donald Trump. There is no portion of the advertisement that could only be interpreted as a call to vote against Donald Trump and thus the advertisement does not contain express advocacy against Donald Trump as defined at 11 C.F.R. § 100.22. As there is no "express advocacy" or "clear call to a specific electoral action" with regard to Donald Trump in any of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188, no portion of any of these advertisements should have been reported as independent expenditures opposing Donald Trump.

⁴⁵ Wrong Choice for TX Families, YouTube (Oct. 4, 2015), https://www.youtube.com/watch?v=GJCZwJ3iYXw.

Because the portion of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188 attributable to Donald Trump did not contain express advocacy opposing Trump, they were properly reported by the DCCC and Colorado Democratic Party as operating expenditures. The Commission's regulations and previous decisions are clear: if a party committee airs a communication that does not constitute an independent expenditure or party coordinated communication, the expenses associated with the advertisements, or relevant portions thereof are operating expenditures. 46

III. The Complaint Presents No Genuine Allegation of Coordination with HFA, and The Facts Demonstrate That None Occurred

None of the relevant advertisements was coordinated with HFA. There was no coordination between the Respondents on the one hand, and HFA on the other, regarding any of the advertisements cited by the Complaints. None of the Complaints alleges any specific facts that could even be taken to suggest coordination.⁴⁷

Instead, the Complaints make the conclusory allegation that the advertisements were coordinated with HFA. However, such pure speculation cannot support a finding of a reason to believe. The Commission may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Act. For claims of coordination, the Commission requires an even stronger showing: that Complainant provide "probative information of coordination." The Commission has also made clear that "unwarranted legal conclusions [drawn] from asserted facts" or "mere speculation" are *not* sufficient to find reason to believe that Respondents violated the Act through impermissible coordination. Because the Complaints rely exclusively on pure speculation and unwarranted legal conclusions for their coordination claims, there is no reason to believe any coordination occurred.

The Commission also must consider whether Respondents have provided "sufficiently compelling evidence" to refute the Complaints' claims. In this case, the declarations accompanying this response provide strong, probative evidence of the absence of coordination between Respondents and HFA on these ads. The declaration of Michael Ian Russell, the DCCC's Deputy Executive Director and Political Director, is especially important. Mr. Russell makes clear that he supervised the communications campaign at issue in these Complaints; that it did not involve any request, suggestion or assent from HFA; that he instructed those participating in the program to refrain from any

⁴⁶ FEC Adv. Op. 1985-14 (DCCC) ("DCCC may report these expenditures as operating expenditures.").

⁴⁷ See Exhibit A.

⁴⁸ Statement of Reasons, Commissioners Mason, Sandstrom, Smith, and Thomas, MUR 4960 (Dec. 21, 2001).

⁴⁹ FEC Matter Under Review 5999, Factual and Legal Analysis (Dec. 15, 2008); see also FEC Matter Under Review 6059, Factual and Legal Analysis, at 6 (Feb. 3, 2009).

FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000). See Exhibits A and C.

⁵² See Exhibit A.

communications with HFA regarding the ads; and that he knows of no deviation from these instructions.⁵³

Because the Complaints rely entirely on speculation to mount the claim of coordination, and because Respondents have provided compelling evidence to refute this speculation even when not required to do so, the Commission should dismiss these baseless claims.

CONCLUSION

The FACT complaints are based completely on an incorrect factual assumption and a blatant misunderstanding of the law. FACT assumed that the Respondents were allocating the advertisements at issue according to the Commission's guidance on generic party hybrid advertising and apparently believe that such hybrid advertising is the only case in which a committee should allocate an advertisement between multiple federal candidates or purposes. In reality, the Commission's regulations provide for the attribution of any communication that concerns multiple Federal candidates. The Respondents followed the Commission's attribution regulations here, and paid for and reported each portion of the advertisements according to the requirements of the Act.

There is absolutely no merit to the allegations in any of the complaints in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188 and the Commission should dismiss all of these complaints against all of the Respondents immediately.

Very truly yours,

Marc E. Elias

Brian G. Svoboda

Graham M. Wilson

Rachel L. Jacobs

Enclosure

Counsel to:

DCCC

Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity, as treasurer Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer Applegate for Congress and Douglas Applegate, in his official capacity as treasurer

⁵³ Id.

Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer Texans for Pete and Wayne Alexander, in his official capacity as treasurer Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer Eggman for Congress and Jay Petterson, in his official capacity as treasurer Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer

LuAnn Bennett for Congress and Jenniser May, in her official capacity as treasurer

Exhibit A

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF MICHAEL IAN RUSSELL

I, Michael Ian Russell, do declare and state as follows:

- 1. During the 2016 election, I worked for DCCC as Deputy Executive Director and Political Director. Through that position, I am familiar with the matters discussed herein. At no point during the 2016 election cycle did I serve as an employee, independent contractor, vendor, or agent of Hillary for America ("HFA").
- 2. As the Deputy Executive Director and Political Director of DCCC, I worked with, and supervised other DCCC employees who worked with, numerous House campaigns on television advertisements that mentioned Donald Trump. Specifically, I worked with (a) Santarsiero for Congress on the advertisement discussed in the complaint in MUR 7169: (b) Ruben Kihuen for Congress on the advertisement discussed in the complaint in MUR 7170 (c) Nelson for Wisconsin on the advertisement discussed in the complaint in MUR. 7171 (d) Colleen Deacon for Congress on the advertisement discussed in the complaint in MUR 7172 (e) Applegate for Congress on the advertisement discussed in the complaint in MUR 7173 (f) Mowrer for Iowa on the advertisement discussed in the complaint in MUR 7174 (g) Texans for Pete on the advertisement discussed in the complaint in MUR 7175 (i) Shkreli for Congress on the advertisement discussed in the complaint in MUR 7176 (j) Carroll for Colorado on the advertisement discussed in the complaint in MUR 7177 (k) Eggman for Congress on the advertisement discussed in the complaint in MUR 7178 (I) Murphy for Congress on the advertisement discussed in the complaint in MUR 7179 (m) Bryan Caforio for Congress on the advertisement discussed in the complaint in MUR 7182 (n) Friends of Christina M. Hartman on the advertisement discussed in the complaint in MUR 7187 and (o) LuAnn Bennett for Congress on the advertisement discussed in the complaint in MUR 7188 (each a "Campaign" or "Advertisement" or collectively the "Campaigns" and "Advertisements," respectively). I took the lead at DCCC for managing this advertising program. I supervised this program and all DCCC staff working on these Advertisements. I was also in contact, directly or indirectly through my staff, with each of the Campaigns involved in these Advertisements.
- 3. This program was conceived by DCCC without any request, suggestion, or assent by HFA or its agents. DCCC believed that the advertising program would be an effective way to promote our Democratic House candidates and the Democratic Party, given the intense opposition among Democratic voters to Donald Trump and the policies and positions he espoused.
- 4. I managed every aspect of the creation, production, and dissemination process for each of these Advertisements, starting with script development through the advertising buying phase of each Advertisement. To that end, with a core group of DCCC staff, I worked directly with each Campaign and advertising vendor to draft each script and produce and edit each Advertisement.

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- 5. I instructed my staff working on the Advertisements and the staff of Campaigns involved with the Advertisements not to discuss any aspect of these Advertisements with HFA or its agents. Likewise, my staff and the Campaigns were instructed not to have any involvement with HFA or its agents with regard to these Advertisements. I am not aware of any breach of or deviation from this protocol.
- 6. To the best of my knowledge, and consistent with the instructions I gave, these Advertisements were developed internally at DCCC in coordination with each Campaign without any communication with or from Hillary for America or its agents. Likewise, to the best of my knowledge, none of the Advertisements were created, produced, or distributed at the suggestion or request of HFA or its agents nor did they assent to the creation, production, or distribution of any of the Advertisements.
- 7. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had any involvement with HFA or its agents regarding any Advertisement in any way, including, but not limited to:
 - i. the content of any Advertisement;
 - ii. the intended audience for any Advertisement;
 - iii. the means or mode of any Advertisement;
 - iv. the specific media outlet used for any Advertisement;
 - v. the timing or frequency of any Advertisement; or
 - vi. the duration of any Advertisements.
 - 8. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had discussions about with HFA or its agents about any Advertisement or HFA's plans, projects, activities, or needs with regard to any Advertisement. Neither HFA nor its agents conveyed to me, and to the best of my knowledge to any DCCC employee or Campaign staff working on these Advertisements, any relevant information about HFA's plans, projects, activities, or needs concerning any Advertisement.
 - 9. To the best of my knowledge, no DCCC employee or Campaign staff working on these Advertisements was employed by HFA at any time during the 120 days prior to the date that each Advertisement was aired.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this Z/44 day of December, 2016.

Micheel Ian Russell

Exhibit B

Image# 201512089039916605

SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

PAGE 109105 OF 109107 FOR LINE 25 OF FORM 3X (To be used only by Political Committees in the General Election) NAME OF COMMITTEE (In Full) DCCC Has your committee been designated to make Full Name of Subordinate Committee coordinated expenditures by a political party committee? DCCC X YES | NO If YES, name the designating committee: Mailing Addross 430 South Capitol Street, SE 2nd Floor **Democratic National Committee &** ZIP Code State Pennsylvania Democratic Party Washington 20003-4024 DC Full Name (Last, First, Middle Initial) of Each Payee Memo Item Purpose of Expenditure Media Services Mundy Katówitz Media, Inc. Category/ Malling Address 1322 G Street, SE Type Date City State Zip Code ¹21 2016 Washington DC 20003 Name of Fuderal Candidate Supported Office Sought: x House State: PA Amount Hartman, Christins. . . Sonate District: 16 96070.00 Presidential Aggregate General Election 96070.00 Exponditure for this Candidate Transaction IO : SF-953178 Full Name (Last, First, Middle Initial) of Each Payce, Purpose of Expenditure Memo Item Category/ Туре Mailing Address Date State Zip Code City Name of Federal Candidate Supported State: Office Sought: House Amount Senale District: Presidential Aggregate General Election Expenditure for this Candidate Purpose of Expenditure Full Name (Last, First, Middle Initial) of Each Payer : ! Memo Item Category/ Type Mailing Address Date City State Zip Code Name of Foliaral Candidate Supported Office Sought: House State: Amount Sonnie District: Presidential Aggregate General Election Expenditure for this Candidate 96070.00 SUBTOTAL of Expenditures This Page (optional)..... TOTAL This Period (last page this line number only).....

Image# 201610279034718056 -

SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON REHALE OF CANDIDATES FOR FEDERAL OFFICE

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE PAGE 47529 OF 47535 FOR LINE 25 OF FORM 3X (To be used only by Political Committees in the General Election) NAME OF COMMITTEE (In Full) DCCC Has your committee been dusignated to make Full Name of Subordinate Committee coordinated expenditures by a political party committee? DCCC Y YES NO If YES, name the designating committee: Mailing Address 430 South Capitol Street, SE 2nd Floor **Democratic National Committee &** State ZIF Codo: Michigan Democratic Party Washington DC 20003-4024 Full Name (Last, First, Middle Initial) of Each Payoe : Memo liem Purpose of Expenditure Media Services Three Point Media, LLC Catagory/ Mailing Address 1000 Potomac Street, NW Typo' Dain Suite 500 City Stato Zip Code 2018 10 Washington DC 20007 Name of Federal Candidate Supported Office Sought: | x ; House State: Amount Driskell, Gretchen, , , Sonale District: Presidential 1000.00 Aggregate General Election 96200.00 Expenditure for this Cundidate Transaction ID: SF-951470 Full Name (Lost, First, Middle Initial) of Each Payee ! | Momo Item Purpose of Expenditure Media Services Mundy Katowitz Media, Inc. Category/ Mailing Address 1322 G Street, SE Туро Date City State Zip Code 2016 DC 10 13 Washington 20003 Name of Federal Candidate Supported Office Sought: | * House State: ___Mt Amount Driskell, Grotchen. . . Senate District: 07 Presidential 95200.00 Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID: SF-951459 Full Name (Last, First, Middle Initial) of Each Payes 1 i Momo Itam Purpose of Expenditure Media Services Buying Time, LLC Category/ Mailing Address 650 Massachusetts Avenue, NW Туро Suite 210 Dalo City Zip Code State 10 17 2016 Washington DC 20001 Namo of Federal Candidate Supported Office Sought: x : House State: Amount 80 District: Shkreli, Suzanna, , , Senale **Prosidential** 52960.00 Aggregate General Election 52960,00 Expenditure for this Candidate > Transaction IO: SF-952064 149160.00 SUBTOTAL of Expenditures This Page (optional)..... TOTAL This Period (last page this line number only)......

Image# 201612209040802696

SCHEDULE F (FEC Form 3X).
ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)

ON BEHALF OF CANDIDATES I	FOR FED	ERA	L OFFICE	•		PAGE	109107 OF 109107
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SCHEDULE F (FEC Form 3X)

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PAGE 47535 OF 47535

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SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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City Fairfax	VA		22030		09	23		2016
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Exhibit C

BEFORE THE FEDERAL ELECTION COMMISSION

DECLARATION OF MAURA JOHNSON - MUR 7179

- 1, Maura Johnson, do declare and state as follows:
 - During the 2016 election, as a Mcdia Supervisor at GMMB, Inc. ("GMMB"), I provided
 media buying services for Ralston Lapp Media, the consultant working with Stephanie
 Murphy for Congress. Through that position, I am familiar with the matters discussed
 herein.
 - 2. During that time, I worked with DCCC and Stephanie Murphy for Congress to distribute an advertisement discussed in the complaint in FEC Matter Under Review 7179 (the "Advertisement"). To the best of my knowledge and belief, I was the only employee of GMMB that worked on the Advertisement.
 - 3. GMMB worked for Hillary for America ("HFA") during the 2016 election cycle.
 - 4. To the best of my knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
 - 5. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:

MJ 12/21/16

- i. the content of the Advertisement;
- ii. the intended audience for the Advertisement;
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had discussions with HFA or its agents about the Advertisement.
- 7. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used information previously used by GMMB in providing services to HFA in relation to the distribution of the Advertisement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 31 day of December, 2016.

Maura Johnson

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF DAVID DIXON AND RICHARD DAVIS, DIXON/DAVIS MEDIA GROUP LLC - MUR 7188

David Dixon and Richard Davis do declare and state as follows:

- During the 2016 election, we were partners at the Dixon/Davis Media Group LLC
 ("Dixon/Davis"). Through that position, we are familiar with the matters discussed
 herein.
- At the request of DCCC, and with the guidance of DCCC and their legal counsel,
 Dixon/Davis worked with DCCC and LuAnn Bennett for Congress to create, produce,
 and distribute an advertisement discussed in the complaint in FEC Matter Under Review
 7188 (the "Advertisement").
- 3. Dixon/Davis worked for Hillary for America ("HFA") during the 2016 election cycle.
- 4. To the best of our knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
- 5. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:
 - i. the content of the Advertisement;

- ii. the intended audience for the Advertisement;
- iii. the means or mode of the Advertisement;
- v. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had discussions with HFA or its agents about the Advertisement.
- 7. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used information previously used by Dixon/Davis in providing services to HFA in relation to the creation, production, or distribution of the Advertisement.

We declare under penalty of perjury that the foregoing is true and correct. Executed on this **22** day of December, 2016.

David Dixor

Richard

Exhibit D

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
(Schedule E)	PAGE 9 OF 9 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
Check if 24-hour report	illed on
Full Name of Payee Old Towne Media Dato of Dissemination: 10/19/16 Mailing Address 4507 Penwood Dr	Date of Public Distribution/Dissemination
	Amount
City State Zip Code Alexandria · VA 22310	Transaction ID: SE-952383 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Catogory/ Type Out Type	10 18 2016
Denote 1 Toron	iffice Sought: House District: 00 President Senate State:
Calendar Year-To-Date Per Election for Office Sought 2742321.20 20	Isbursement For: ☐ Primary ☐ General
Full Name of Payee AL Media, LLC Date of Dissemination: 10/19/16	Date of Public Distribution/Dissemination
Mailing Address 222 West Ontario West-	Amount
City State Zip Code Chicago IL 60654	7 Transaction ID : SE-952867 Date of Disbursement or Obligation
Purpose of Expenditure Mndia Buy Category/ Type 004	10 14 2016
in the second se	ffice Sought: House District: 00 House State:
Calendar Year-To-Date Per Election for Office Sought	isbursement For: ☐ Primary ☒ General 016 ☐ Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	129321.00
(b) SUBTOTAL of Unitemized Independent Expenditures	() () () () () () () () () ()
(c) TOTAL Independent Expenditures	273146.39
Under ponalty of perjury I contify that the independent expenditures reported herein were not with, or at the request or suggestion of, any condidate or authorized committee or agent of eigenty committee) any political party committee or its agent.	made in cooperation, consultation, or concert ther, or (If the reporting entity is not a political
Kelly C. Ward	10 21 2016
Signalure	· · · · · · · · · · · · · · · · · · ·

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 48 OF 60
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER Y
DCCC	C, C00000935
Check if 24-hour report 48-hour report New report Amends report file	of on The state of
Full Name of Payee Screen Strategies Media, LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/24/16	10 1 24 1 2016
Mailing Address 11150 Fairlax Sivd	Amount
Suite 505	
City State Zip Code Fairfax VA 22030	Transaction ID : SE-952072 Date of Disbursement or Ohligation
Purpose of Expenditure Media Buy Category/ Type 004	10 17 2016
Name of Federal Candidate Support Office	ce Sought: House District: 00
Donald J. Trump Oppose 10	President Senate State:
**************************************	oursament For: Primary General
Contract and Contr	(Other (specify) ▶
Full Namo of Payee AL Media LLC Date of Dissemination: 10/24/16	Oate of Public Distribution/Dissemination
Mailing Address 222 W Onlario St	- '
Suite 600	Amount
City State Zip Code	131250.00
Chicago IL 50654	Transaction ID : SE-953187 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type O04 Type	10 21 2016
Name of Federal Candidate Support Office	ce Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calendar Year-To-Date 1 3653174.61 Dist	oursement For: Primary General 6
(a) SUBTOTAL of Itemized Independent Expenditures	176250.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
<u> </u>	المشاور استصبيتنان والمراديات
(c) TOTAL Independent Expenditures	The state of the s
Under penalty of perjury I certify that the Independent expanditures reported herein were not me with, or at the request or suggestion of, any condidate or authorized committee or agent of either party committee) any political party committee or its agent.	
Kelly C. Ward	- 2 4 0 0 0 1 4 4 4 5 5 4 5
Signature	10 25 2016

NAME OF COMMITTEE (in Fully DCCC FEC IDENTIFICATION NUMBER V Code	24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 51 OF 60
Check II)
Check II 24-hour report		FEC IDENTIFICATION NUMBER Y
Check ii		
AL Media LLC Date of Dissemination: 10/25/16 Mailing Address 222 W Ontario St Suite 600 City Chicago Lit. 60654 Purpose of Expenditure Category* Category 100 Amount Support Category 210 Amount Category* Cate	Check II 24-hour report 48-hour report New report Amends report filed	q ou [", ", " 1 [p.a.p] , hardendary
Mailing Address 222 W Onlario Si Suite 600	Full Name of Payee	Date of Public Distribution/Dissemination
Amount City Chicogo It 60054 Purpose of Expenditure Model Buy Namo of Féderal Candidate Ooneld J. Trump Calendar Year-To-Date Per Election for Office Sought Full Name of Peyeo Canal Partners Media, LLC Oato of Dissemination: 10725/16 Marifula Purpose of Expenditure Marifula Category/ Amount Amount Trump Calendar Year-To-Date Per Election for Office Sought Full Name of Peyeo Canal Partners Media, LLC Oato of Dissemination: 10725/16 Marifula Purpose of Expenditure Media Buy Name of Federal Candidate Oato of Public Distribution/Dissemination 10725/16 Marifula Category/ Ing Ing Ing Ing Ing Ing Ing Ing		
Suile 600 City Chicago II. 60654 Purpose of Expenditure Modia Buy Namo of Federal Candidate Ooneld J. Trump Calendar Year-To-Date Per Election for Office Sought Purpose of Expenditure Additing Address Suite 200 City Merinita Calendar Year-To-Date Suite 200 City Merinita Calendar Year-To-Date Suite 200 Consult J. Trump Calendar Year-To-Date Suite 200 City Merinita Calendar Year-To-Date Suite 200 City Merinita Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Pur Election for Office Sought 10 125 2016 Amount Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candidate Ooneld J. Trump Calendar Year-To-Date Purpose of Expenditure Media Buy Name of Pederal Candi	Mailing Address 222 W Ontario St	Language of the state of the st
Chicago Chicago L 60854 Transaction ID: \$E-85328 Date of Disbursement or Obligation	Suite 600	
Name of Federal Candidate Category Dod 10		9000.00
Hurbose of Expenditure Marin of Federal Candidate Consid J. Trump Calendar Year To-Date Per Election for Office Sought Full Name of Peyes Candidar Year To-Date Per Election for Office Sought Full Name of Peyes Cand Partners Media, LLC Date of Dissemination: 10/25/16 Mailing Address 25 Whitlock Piace Suite 200 City Marintta GA 30084 Purpose of Expenditure Media Buy Category/ Media Buy Category/ Name of Federal Candidate Denseld J. Trump Oppose Category/ Type Oppose Category/ Category/ Category/ Category/ Date of Disbursement or Obtigation Transaction to : \$E-952497 Date of	Chicago IL 60654	Transaction (D : SE-953228 Date of Disbursement or Obligation
Donald J. Trump Calendar Year-To-Date Per Election for Office Sought Full Name of Peyee Canal Partners Media, LLC Date of Dissemination: 10/25/16 Marifing Address 25 Whitlock Place Suite 200 City Marinitib Purpose of Expenditure Media Buy Name of Federal Candidate Daneld J. Trump Calegory/ Media Buy Calegory/ Media Buy Calendar Year-To-Date Per Election for Office Sought Calendar Year-To-Date Per Election for Of	Modia Ruy Catagory 004 1	10 24 2016
Calendar Year-To-Date Per Election for Office Sought Full Name of Peyes Canal Partners Media, LLC Date of Dissemination: 10/25/16 Moiling Addrass 25 Whitlock Pisco Suite 200 City State Purpose of Expenditure Media Buy Name of Pederal Candidate Donald J. Trump Calendar Year-To-Date Por Election for Office Sought Calendar Year-To-Date Por Election for Office Sought (a) SUBTOTAL of Unitamized Independent Expenditures Under penalty of perjury 1 certify that the independent expenditures reported herein were not made in cooperation, concultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a pullical party committee) arry political party committee or its agent. Kirlly C. Firent Date of Disbursement For: Disbursement For: Di	Name of Federal Candidate Support Offic	e Sought: House District: 00
Per Election for Office Sought Full Name of Payee Canal Partners Media, LLC Date of Dissemination: 10/25/16 Motiling Address 25 Whitlock Pisco Suite 200 City State Zip Code Marintia GA 30064 Purpose of Expenditure Media Buy Name of Federal Candidate Doneld J. Trump Category/ 1990	Donald J. Trump Oppose	President Senate State:
Full Name of Payee Canal Partners Media, LLC Date of Dissemination: 10/25/16 Mailing Addrass 25 Whitlock Place Suite 200 City State Zip Code Marintta GA 30064 Purpose of Expenditure Media Buy Name of Federal Candidate Doneld J. Trump Category/ Type Category/ Type Category/ Type Category/ Dodd	Per Flaction for Office Sought 4369947.93 2016	r-1
Canal Partners Media, LLC Oato of Dissemination: 10/75/16 Meiling Addross 25 Whitlock Place Suite 200 City State Zip Code Marietta GA 30064 Purpose of Expenditure Media Buy Category: 004 Name of Federal Candidate Doneld J. Trump Calendar Year-To-Date Pur Election for Office Sought Category: 004 Ca	The stand of the s	
Maristia State Zip Code Suite 200 City State Zip Code Maristia GA 30064 Transaction ID: SE-552497 Date of Disbursement or Obligation Purpose of Expenditure Media Buy Tipp 1004 Name of Federal Candidate Donald J. Trump Calegory/ Type 1004 Name of Federal Candidate Donald J. Trump Calendar Year-To-Date Por Election for Office Sought Amount Transaction ID: SE-552497 Date of Disbursement or Obligation Unifer Sought: House District: 00 Oppose President Senate State: Disbursement For: Primary Calendar Year-To-Date Por Election for Office Sought Amount Transaction ID: SE-552497 Date of Disbursement or Obligation Unifer Sought: House District: 00 Oppose Calendar Year-To-Date Por Election for Office Sought Amount Transaction ID: SE-552497 Date of Disbursement or Obligation Unifer Sought: House District: 00 Oppose Office Sought: House District: 00 Oppose Other (specify) Other (specify) Other (specify) Unifer penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or all party committee or all party committee or all party committee or all political party committee or list agent.	Canal Partners Media, LLC	
Suite 200 City State Zip Code Marietta GA 30064 Transaction ID: \$E.952497 Date of Disbursement or Obligation Purpose of Expenditure Media Buy Name of Federal Candidate Doneld J. Trump Catendar Year-To-Date Por Election for Office Sought (a) SUBTOTAL of Itemized Independent Expenditures Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, concultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. State: 184082.00 Transaction ID: \$E.952497 Date of Disbursement or Obligation Transaction ID: \$E.952	Mailing Address 25 Whillock Place	" v' ami" : North fractional and and a
Marietta GA 30064 Transaction to: SE-932497 Date of Disbursement or Obligation Purpose of Expenditure Media Buy Name of Federal Candidate Donald J. Trump Calendar Year-To-Date Por Election for Office Sought (a) SUBTOTAL of Unitarnized Independent Expenditures (b) SUBTOTAL of Unitarnized Independent Expenditures (c) TOTAL Independent Expenditures Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, concultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. Transaction to: SE-932497 Date of Disbursement or Obligation Category/ Type Office Sought: Support Office Sought: President Senate State: Disbursement For: Prinary Other (specify) 193082.00 193082.00 Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, concultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.	Suite 200	i
Purpose of Expanditure Media Buy Category/ Type Odd Type Odd Type Odd Type Odd Office Sought: Date of Disbursement or Obligation Support Office Sought: Date of Disbursement or Obligation Office Sought: Office Sought: Date of Disbursement or Obligation Office Sought: Office Sought: Date of Disbursement or Obligation Office Sought: Office Sought: House District: OD Office Sought: House District: OD Office Sought: Prinary General Other (specify) Other (specify) Other (specify) Under penalty of Unitermized Independent Expenditures Under penalty of perjury 1 certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. Kelly C. Franci	City State Zip Code	184082.00
Name of Federal Candidate Support Support Office Sought: House District: 00	Marietta GA 30064	
Donald J. Trump Calendar Year-To-Date Por Election for Office Sought 4369947.93 Calendar Year-To-Date Por Election for Office Sought A369947.93 Calendar Year-To-Date Cother Senate State: Cother (specify) Cather (specify)	Modin Bun.	
Calendar Year-To-Date Por Election for Office Sought 4369947.93 Disbursement For: Primary General 2016 Other (specify) 193082.00 (a) SUBTOTAL of Itemized Independent Expenditures (b) SUBTOTAL of Unitarnized Independent Expenditures (c) TOTAL Independent Expenditures Under penalty of perjury 1 certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.	Name of Federal Candidate Support Office	e Sought: House District: 00
Par Election for Office Sought 4369947.93 2016 Other (specify) (a) SUBTOTAL of Itemized Independent Expenditures	Donald J. Trump Oppose	President Senate State:
(a) SUBTOTAL of Itemized Independent Expenditures	Br. Election for Office South 4369947.93 2016),, \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
(c) TOTAL Independent Expenditures	H	() Other (specify)
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. Kelly C. Ford Date 10, 25, 2016	(a) SUBTOTAL of Itemized Independent Expenditures	193082.00
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. Kelly C. Frand Date 10 , 25 , 2016 1	(b) SUBTOTAL of Unitarnized Independent Expenditures	و منه منه منه منه در
with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. Kelly C. Ward Date 10 : 25 2016 1	(c) TOTAL Independent Expenditures	
with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. Kelly C. Prord Onto 10 , 25 , 2016 1		
Kelly C. Prard Onte 10 1 25 2016 1	with, or at the request or suggestion of, any candidate or authorized committee or agent of either	ade in cooperation, consultation, or concert r, or (if the reporting entity is not a political
Onte 10 , 25 2016 1		
Signaturo	Onte 1	0 25 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 23 OF 23
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (IN Full) DCCC	FEC IDENTIFICATION NUMBER Y
	C C00000935
Check if 🔀 24-hour report [] 48-hour report [] Amends report tile	ed on
Full Name of Payer	Date of Public Distribution/Olssemination
Moore Campaigns, LLC	10 28 2016
Mailing Address 447 Irving St. NW	Amount
City State Zip Codo	4472.36
Washington DC 20010	Transaction ID: SE-954234 Duto of Dispursament or Obligation
Purpose of Expenditure Mail Services Calegory/ Typo Typo	10 27 2016
Name of Federal Candidate Support Offi	ce Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
	bursement For: Primary General
Per Election for Office Sought 4593586.81 201	6 Other (specify) ▶
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media LLC	10 28 2016
Mailing Address 222 W Ontario St	1 32 1 2 2 2 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4
Suita 600	Amount
City State Zip Code	30525.00
Chicago IL 60654	Transaction IO : SE-953928 Date of Disbursement or Obligation
Purpose of Expenditure Media Ruy Category/ Type O04	10 28 2016
Name of Federal Candidate . Support Offi	ce Sought: House District: 00
Oonald J. Trump Oppose	President Senate State:
Calendar Year-To-Date	bursement For: Primary 💢 General
Per Election for Office Sought 4593586.81 201	Other (specify) >
	ments are a great and an agent and an agent and a great and a
(e) SUBTOTAL of Itemized Independent Expenditures	34997.36
	Seath - who is survivously and production in and
(b) SUBTOTAL of Unitemized Independent Expenditures	The second second second second
A S MARTINE A S A S A S A S A S A S A S A S A S A	The second second second second second
(c) TOTAL Independent Expenditures	1588663.18
Under panalty of parjury I corilly that the independent expenditures reported herein were not new with, or at the request or suggestion of, any candidate or authorized committee or agent of eith party committee) any political party committee or its agent.	nade in cooperátion, cunsultation, or concert er, or (if the reporting entity is not a political
Kelly C. Ward F à	. m / tm - o 1 / 5 * * * * * * * * * * * * * * * * * *
	10 29 2018
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Image# 201610319037014651 . 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

(Schedule E)			PAGE 7 OF 8 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC		- W	FEC IDENTIFICATION NUMBER V
Check if 24-hour report 348-hour report	ort New rep	oort Amends repo	ort filed on
Full Name of Payee Adelstein & Associates LLC Date of Dissemin	ation: 10/31/16		Date of Public Distribution/Dissemination
Mailing Address 222 West Ontario Street, Sc	ille 600		Amount
City Chicago	State IL	Zip Code 60654	Transaction ID : SE-954371 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10 28 VY Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Name of Federal Candidate		Support	Office Sought: House District: 00
Trump, Donald, J., ,		X Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		4979620.65	Disbursement For: ☐ Primary
Full Name of Payee Adelstein & Associates LLC Date of Dissemir	, nation: 10/31/16	· ·	Date of Public Distribution/Dissemination
Malling Address 222 West Ontario Street,	Suite 600		Amount
City	State	Zip Code	. 67387.50
Chicago	IL	60654	Transaction ID : SE-954372 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Typo 004	10 28 / 2016
Name of Federal Candidate		Support	Office Sought: House District: 00
Trump, Donald, J., ,			President Senate State:
Calendar Year-To-Date Per Election for Office Sought		4979620.65	Disbursement For: ☐ Primary General Other (specify) ☐
(a) SUBTOTAL of Itemized Independent Exp	enditures		147387.50
(b) SUBTOTAL of Unitemized Independent E	Expenditures	•	·· >
(c) TOTAL Independent Expenditures			·· >
	candidate or authorize		not made in cooperation, consultation, or concert of elther, or (if the reporting entity is not a political
Ward, Kelly, C., .	[Electron	nically Filed Date	e 10 31 2016
Signature			

24/48 HOUR REPORT OF INDEPENDE	NT EXPE	NDITURES	PAGE 51 OF 52
(Schedule E)			FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			FEC IDENTIFICATION NUMBER V
			C C00000935
Check if 24-hour report 2 48-hour report	X New	report Amends repo	ort filed on
Full Name of Payer Screen Strategies Media, LLC			Date of Public Distribution/Dissemination
Date of Dissemination: Malling Address 11150 Fairfax Blvd	10/18/16		10 18 2016
Suite 505			Arnount
City	State	ZID Code	134898.50
Fairfax	VA	22030	Transaction ID : SE-952377 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10 11 2016
Name of Federal Candidate		Support	Office Sought: House District: 00
Ooneld J. Trump		X Oppose	X President Senale State:
Calendar Year To-Date Per Election for Office Sought	,	2613000.20	Disbursement For: Primary X General 2016
Full Name of Payee			Date of Public Distribution/Dissemination
Kully Hall, LLC Date of Dissemination:	10/18/16		10 18 2016
Mailing Address 1932 1st Ave, Sulte 203			Amouni
Cin.	State	Zip Code	6225.00
City Soattle	WA	98101	Transaction ID : SE-952379 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type	10 18 2016
Name of Federal Candidate		Support	Office Sought: House District: 00 ·
Oonald J. Trump		Х. Оррове	X: President Schate State:
Calendar Year-To-Date Per Election for Office Sought		2613000.20	Disbursement For: Primary General 2016 — Other (specily) ▶
. (a) SUBTOTAL of Itemized Independent Expenditu	res		·. >
(b) SUBTOTAL of Unitermized Independent Expend	litures		 ▶
(c) TOTAL Independent Expenditures			"▶
Under penalty of perjury i certify that the independ with, or at the request or suggestion of, any candio party committee) any political party committee or its	late or author		
Kelly C. Ward			10 19 2016
Signature		Date	

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 48 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER V
DCCC .	C c00000935
Check if 24-hour report 48-hour report New report 4	Amends report filed on
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/24/16	Oate of Public Distribution/Dissemination
Mailing Address 11150 Fairtax Blvd	10 24 2010
Suito 505	Arnount
City State Zip Code	de 45000.00
Fairfax VA 22030	Transaction ID : SE-952072 Date of Disbursement or Obligation
Purpose of Expenditure Category Media Buy Typ	
Name of Federal Candidate	Support Office Sought: . House District: 00
Donald J. Trump	Oppose President Senate State:
Calendar Year-To-Date	Dishursement For: . : Primary X General
Per Election for Office Sought , 3653174.61	2016 Other (specify)
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media LLC Date of Dissemination: 10/24/16	10 24 2016
Mailing Address 222 W Ontario St	10 24 2018
Suite 600	Amount
City State Zip Code	je 131250.00
Chicago II. 60654	Transaction ID : SE-953187 Date of Disbursement or Obligation
Purpose of Expenditure Calegory Media Buy	70V 004 10 21 2016
Name of Foderal Candidate	Support Office Sought: House District: 00
Donald J. Trump	Cipose President Senate State:
Calendar Year-To-Date Per Election for Office Sought 3653174.	Olsbursement For: ☐ Primary X General 2016
(a) SUBTOTAL of Itemized Independent Expenditures	
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Exponditures	· ,
Under penalty of perjury I certify that the independent expenditures reported high, or at the request or suggestion of, any candidate or authorized committee party committee) any political party committee or its agent.	herein were not made in cooperation, consultation, or concert ec or agent of either, or (if the reporting entity is not a political
Kelly C. Ward	
Signature	Onte 10 25 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
Schedule E)	PAGE 52 OF 60
NAME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48
DCCC	FEC IDENTIFICATION NUMBER >
	C C00000935
Check if 24-hour report 48-hour report New report Amends report filed	on
Full Name of Payer	Oate of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/25/16	10 25 2016
Mailing Address 11150 Fairfax Blvd	Ame and
Suite 505	Amount
City State Zip Code	64326.00
Fairlax VA 22030	Transaction ID : SE-953184 Date of Disbursement or Obligation
Purpose of Expenditure Category/ Type 004	10 21 2016
Name of Federal Candidate J Support Office	Sought: House District: 00
15 H. T	President Senale State:
2)	sement For: : Primary X General
Calendar Year-To-Date Por Election for Office Sought 4369947.93	
Full Name of Payee	Date of Public Distribution/Dissemination
Buying Time, LLC Date of Dissernination: 10/25/16	ft tt 6 tt 8 t 7 t 4 t
Mailing Address 650 Massachusetts Avenue, NW	10 25 2016
Suite 210	Amount
City State Zip Code	62488.00
y de la	Transaction ID : SE-953185 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type O04	10 21 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump X: Oppose X	President Senate State:
Calendar Year-To-Date Disbut	rsement For: Primary K General
Par Election for Office Sought 4369947,93 2016	Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	128814.00
(c) TOTAL Independent Expenditures	,
Under penalty of perjury I certify that the independent expenditures reported herein were not made with, or at the request or suggestion of, any candidate or authorized committee or agent of either, party committee) any political party committee or its agent.	
Kells C. Ward	· · · · · · · · · · · · · · · · · · ·
Signature Date 10	25 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
(Schedule E)	.PAGE .8 OF 8
NAME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48
DCCC (IN Full)	FEC IDENTIFICATION NUMBER ▼
	C C00000935
	July and Value
Check If :X 24-hour report 48-hour report X New report Arnel	nds report filed on
Full Name of Payee	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/31/16	10 31 2016
Mailing Address 11150 Fairfax Blvd	
Suite 505	Amount
City State Zip Code	55000.00
Fairtax VA 22030	Transaction ID : SE-953293
Purpose of Expenditure	Date of Disbursement or Obligation
Media Buy Category/ Type	004 10 25 2016
Name of Federal Candidate	pport Office Sought: 1 House District: 00
Donald J. Trump	- · · · · · · · · · · · · · · · · · · ·
	Disbursement For: Primary X General
Calendar Year To Date Per Election for Office Sought 4979620.65	2016 Other (spacify)
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media LLC	10" 31" 2016
Date of Dissemination; 10/31/16	10 31 2016
Mailing Address 222 W Ontario SI	Amount
Suite 600 City State Zip Code	115875.00
	Transaction ID : SE-954178
	Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type	10" 27" 2016"
Name of Federal Candidate	apport Office Sought: House District: 00
Donald J. Trump	
	·
Calendar Year To Date Per Election for Office Sought 4979620.65	Disbursement For: Primary General 2016 Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	
(b) SUBTOTAL of Uniternized Independent Expenditures	
(a) TOTAL Judgemedeel Franciscope	
(c) TOTAL Indopendent Expanditures	433711.75
Under penalty of perjury I certify that the independent expenditures reported here	in were not made in cooperation, consultation, or concert
with, or at the request of suggestion of, any candidate or authorized committee or party committee) any political party committee or its agent.	agent or either, or (if the reporting entity is not a political
Kelly C. Ward	
	Date 10 31 2016
Signature	

_	Image# 201611049037121060 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES					
	hedule E)				PAGE 10 OF 11 FOR SE OF FORM 24/48	
NAM	ME OF COMMITTEE (In Full)					
	CCC				FEC IDENTIFICATION NUMBER V	
					C c00000935	
Che	Check If					
_ 	Full Name of Payee Screen Strategies Media, LLC	C Ination: 11/04/16			Date of Public Distribution/Dissemination	
)-	Malling Address 11150 Fairfax Blvd	nation: 1 i/U4/ 10			11 04 2016	
	Suite 505	<u></u> -			Amount	
Ţ	City	State	Zip Code		40000.00	
	Fairfax	. VA	22030		Transaction ID : SE-954176 Date of Disbursement or Obligation	
	Purpose of Expenditure Media Buy		Category/ 004		10 27 2016	
	Name of Federal Candidate		Support	Office	Sought: House District; 00	
L	Trump, Donald, J., ,		X Oppose	X	President Senate State:	
	Calendar Year-To-Date Per Election for Office Sought	magicangles spannege angunage or conferentias 21 km/h sankand 2 km	6419383.70	Disbut 2016	rsement For: Primary X General Other (specify) ▶	
Γ	Full Name of Payce				Date of Public Distribution/Dissemination	
	AL Media LLC	nination: 11/04/16			11 04 2016	
	Mailing Address 222 W Ontario St				Amount	
	Suite 600					
	Cliy	State	Zip Code		3750.00	
	Chicago	IL	60654		Transaction ID : SE-954988 Date of Disbursement or Obligation	
	Purpose of Expenditure Media Buy		Category/ Type 004		11 04 2016	
	Name of Federal Candidate		Support	Office	Sought: House District: 00	
	Trump, Donald, J., ,		X Oppose	×	President Senate State:	
	Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbu 2016	ursement For: Primary General Other (specify) ▶	
(8	a) SUBTOTAL of Itemized Independent Ex	penditures		··· >	43750.00	
(t	b) SUBTOTAL of Unitamized Independent	Expenditures		··· >		
(0	(c) TOTAL Independent Expenditures					
wi	Inder penally of perjury I certify that the in tith, or at the request or suggestion of, any arty committee) any political party committee	y candidate or authorized	reported herein were i committee or agent c	not ma of either	ide in cooperation, consultation, or concert , or (if the reporting entity is not a political .	
	Ward, Kelly, C., ,	<i>lFlectron</i>	nically Filed/ Date	rüm	1 04 2016	
	Signature	- Priction	Dale	-	2010	

Image# 201611049037121059 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES					
(Schedule E)	PAGE 9 OF 11				
NAME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48				
DCCC	FEC IDENTIFICATION NUMBER Y				
· · · · · · · · · · · · · · · · · · ·	C C00000935				
Check if X 24-hour report 48-hour report New report Amends report filed	on man , pag , varan				
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/04/16	Date of Public Distribution/Dissemination				
Mailing Address 11150 Fairfax Blvd	11 04 2016				
Suite 505	Amount				
City . State Zip Code	13000.00				
Fairfax VA 22030	Transaction ID : SE-954882 Date of Disbursement or Obligation				
Purpose of Expenditure Media Buy Category/ Type O04	11 03 2016				
Name of Fodoral Condidate	indeed today today				
Tarres Second de la Composition de la Compositio	e Sought: House District:00				
Trump, Donald, J., ,	President Senate State:				
Calendar Year-To-Date Per Election for Office Sought Disb 2016	ursement For: Primary K General Other (specify)				
Full Name of Payes	Date of Public Distribution/Dissemination				
The New Media Firm, Inc. Date of Dissemination: 11/04/16	11 04 2016				
Mailing Address 1730 Rhode Island Ave., NW	Industrial Landing				
Suite 213	Amount				
City State Zip Code	46000.00				
Washington DC 20036	Transaction ID: SE-954883 Date of Disbursement or Obligation				
Purpose of Expenditure Media Buy Category/ Type 004 1	11 03 2016				
Name of Foderal Candidate Support Office	e Sought: House District: 00				
Trump, Donald, J., ,	President Senate State:				
	pursement For: Primary K Goneral				
Per Election for Office Sought 6419383.70 2010					
(a) SUBTOTAL of Itemized Independent Expenditures					
(b) SUBTOTAL of Unitemized Independent Expenditures					
(c) TOTAL independent Expenditures					
Under penalty of perjury I certify that the Independent expenditures reported herein were not m with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concerter, or (if the reporting entity is not a political				
Ward, Kelly. C., . [Electronically Filed] Date	11 04 2016				
Signature	dared handwid landsonaumtrum?				

SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

C C00000935	CHIELD MOCI CHOCK! EXPENDITORES	•					124 OF .1091.07
DCCC C C C C C C C C C	IAME OF COMMITTEE (In Full)				550		
Pull Name of Payee Screen Strategies Media, LLC Internation Internati	DCCC				FECT	DENTIFICAT	ON NUMBER V
Calcon Flyer Care Calcondar Calco					С	C00000935	
Screen Strategies Media, LLC Date of Dissemination 1107161- 24 hours prior to election day Suite 505 State State VA 22030 Purpose of Expenditure Media Buy Calegory' (104 Trump, Donald, J., Consult State Per Election for Office Sought Full Name of Payer The New Media Firm, Inc. Date of Dissemination: 170716 Mailing Address 1730 Rhode Island Ave. NW Suite 213 City Name of Federal Candidate: Trump, Donald, J., Suite 213 City Name of Federal Candidate: Trump, Donald, J., Suite 213 City Name of Federal Candidate: Trump, Donald, J., Suite 213 City Name of Federal Candidate: Trump, Donald, J., Suite 213 City Name of Federal Candidate: Trump, Donald, J., Suite 213 City Name of Federal Candidate: Trump, Donald, J., Suite 213 City Name of Federal Candidate: Trump, Donald, J., Suite 213 City Name of Federal Candidate: Trump, Donald, J., Suite 213 City Name of Federal Candidate: Trump, Donald, J., Suite 213 City Category' Type Obtavisament or Obligation Transaction ID: SE-954644 Date of Public Distribution/Dissemination Transaction ID: SE-954643 Date of Disbursament or Obligation Transaction ID: SE-954644 College President Series In Transaction ID: SE-954644 College President ID: SE-9	Check if 24-hour report 48-hour report	New rep	ort Amends repo	ort filed	on		
Mailing Address 11:50 Fairfax Blvd Stato Stato 22030 Transaction ID : SE-954644 Date of Disbursement or Obligation Date of Polyment or Obligation Date of Disbursement or Obligation Dat	Screen Strategies Media, LLC		, Memo	K a m .	Date of Publi	c Distribution	/Dissemination
Suile 505 City Fairfax VA 22030 Transaction ID: SE-954644 Date of Disbursement or Ohligation Trupse of Expenditure Media Buy Name of Federal Candidate: The New Media Firm. Inc. Date of Disbursement For: The New Media Firm. Inc. Date of Disbursement For: Date of Disbursement For: Date of Disbursement For: Trupse Donald. J. Annual Full Name of Payee The New Media Firm. Inc. Date of Disbursement For: Date of Disbursement For: The New Media Firm. Inc. Date of Disbursement For: Date of Disbursement For: The New Media Firm. Inc. Date of Disbursement For: Date of Disbursement For: The New Media Firm. Inc. Date of Payer (State) Disbursement For: The New Media Firm. Inc. Date of Payer (State) Transaction ID: SE-94643 Date of Disbursement For: The New Media Firm. Inc. Date of Payer (State) The New Media Firm. Inc. Date of Payer (State) The New Media Firm. The New Media F		election day		!	11	07'	2016 .
Suite 505 City Fairfax VA 22030 Transaction ID : SE-954844 Date of Disbursement or Obligation Transaction ID : SE-954844 Date of Disbursement or Obligation Transaction ID : SE-954844 Date of Disbursement or Obligation Transaction ID : SE-954844 Date of Disbursement or Obligation Transaction ID : SE-954844 Date of Disbursement or Obligation To 11 O1 01 2618 Name of Federal Candidate: Trump, Donald, J., Calendar Year-To-Oale Per Election for Office Sought Full Name of Physic The New Media Firm, Inc. Date of Disbursement For: Primary × General Date of Physic Distribution/Dissemination The New Media Firm, Inc. Date of Disbursement For: Primary × General Date of Physic Distribution/Dissemination The New Media Firm, Inc. Date of Disbursement or Obligation Date of Physic Distribution/Dissemination To 2016 Amount A	Mailing Address 11150 Fairfax Blvd				Amount		
Fairfax VA 22030 Transaction ID: SE-954644 Date of Disbursement or Obligation Media Biny 1004 Type 004 Type 004 Type 005 Name of Federal Candidate: Trump. Donald, J.,					Amount		
Purpose of Expenditure Media Buy Name of Federal Candidate: Support Type 004 11 01 2618	City	State	Zip Code				38173.50
Purpose of Expenditure Category/ Type 1004 11 01 26 tills	Fairfax	VA	22030				
Trump, Donald, J x Opposit x President Sensite State: Calendar Year-To-Date Per Election for Office Sought 6693372.69 Full Name of Payso The New Media Firm, Inc. Date of Payso Transaction Iter 1707/18 Mailing Address 1730 Rhode Island Ave., NW Suite 213 City Washington DC 20036 Transaction Iter Se-954643 Date of Disbursement or Obligation Transaction Iter Se-954644 Date of Disbursement o		_				•	
Calendar Year-To-Date Per Election for Office Sought Full Name of Payeo The New Media Firm, Inc. Date of Dissemination, 11/01/16 Mailing Address 1730 Rhode Island Ave. NW Suite 213 City Washington Purpose of Expenditure Media Preduction Name of Federal Candidate: Trump, Donald, J., Calendar Year-To-Date Per Election for Office Sought State Calendar Year-To-Date Per Election for Office Sought State State Calendar Year-To-Date Per Election for Office Sought State Support Calendar Year-To-Date Per Election for Office Sought State Support Calendar Year-To-Date Per Election for Office Sought State Support Calendar Year-To-Date Per Election for Office Sought State Support Calendar Year-To-Date Per Election for Office Sought Sought Sought Annual Calendar Year-To-Date Per Election for Office Sought Support Calendar Year-To-Date Per Election for Office Sought Sought Annual Annual Calendar Year-To-Date Per Election for Office Sought Sought Annual Calendar Year-To-Date Per Election for Office Sought Annual Annual Calendar Year-To-Date Per Election for Office Sought Annual Annual Calendar Year-To-Date Per Election for Office Sought Annual Annual Calendar Year-To-Date Per Election for Office Sought Annual Annual Calendar Year-To-Date Per Election for Office Sought Annual Annual	Name of Federal Candidate:		Support	Office	e Sought:	House	Olstric1:
Per Election for Office Sought Full Name of Payeo The New Media Firm, Inc. Date of Dissemination: 11/01/16 Mailing Address 1730 Rhode Island Ave NW Suite 213 City Washington DC 20035 Purpose of Expenditure Media Production Name of Federal Candidate: Trump, Donald, J., Calendar Year-To-Date Per Election for Office Sought (a) SUBTOTAL of Hemized Independent Expenditures (a) SUBTOTAL of Unitemized Independent Expenditures (b) Suite 120 Suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or or is agent. **Electronically Filed!** Date 12 08 2016 Other (specity) Iv Date 12 08 2016 Other (specity) Iv Date of Public Distribution/Dissemination 1 01 2016 Amount 1 01 2016 Calendar Support Transaction ID: SE-954643 Date of Disbursement or Obligation Transaction ID: SE-954643 Date of Disbursement or Disbursement or Obligation Transaction ID: SE-954643 Date of Disbursement or Obligation Transactio	Trump. Donald, .l., ,		• • • • • • • • • • • • • • • • • • • •	ł	-	Senale	State:
Full Name of Payeo The New Media Firm, Inc. Date of Public Distribution/Dissemination The New Media Firm, Inc. Date of Dissemination: 1/10/1/8 Mailing Address 1730 Rhode Island Ave NW Suite 213 City Washington Purpose of Expenditure Media Production Purpose of Expenditure Media Production Purpose of Expenditure Media Production Name of Federal Candidate: Trump. Donald, J Calendar Year-To-Date Per Election for Office Sought Seg3372.69 Disbursament For: Calendar Year-To-Date Per Election for Office Sought Seg3372.69 Disbursament For: Other (specity) 41739.50 Under penalty of perjury I centify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or is egent. **Itent Kells.** **Linch Kells.**	i ·		6693372,69			·	'
The New Media Firm, Inc. Date of Dissemination: 11/01/16 Mailing Address 1730 Rhode Island Ave., NW Suite 213 City Washington DC 20036 Purpose of Expenditure Media Production Name of Federal Candidate: Trump, Donald, J Calegory/ Trump, Donald, J Calendar Year-To-Date Per Election for Office Sought 8693372.69 Disbursament For: i Primary × General 2016 Calendar Year-To-Date Per Election for Office Sought A1739.50 Calendar Year-To-Date Per Election for Office Sought Calendar Year-To-Date Date of Disbursement or Disputation Calendar Year-To-Date Date of Disburseme			·	!	,		
Mailing Address 1730 Rhode Island Ave NW Suite 213 City Washington DC 20036 Transaction ID: SE-954643 Date of Disbursement or Obligation Purpose of Expenditure Media Production Name of Federal Candidate: Trump, Donald, J Calendar Year-To-Date Per Election for Office Sought 6893372.69 City Under penalty of perjury I certify that the independent expenditures Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or is agent. Electronically Filed	The New Media Firm, Inc.		· Meino	ltern	4		
Suite 213 City Washington DC 20036 Purpose of Expenditure Media Production Name of Federal Candidate: Trump. Donald, J., Calendar Year-To-Date Per Election for Office Sought (a) SUBTOTAL of Unitemized Independent Expenditures (a) SUBTOTAL of Unitemized Independent Expenditures Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. Amount Transaction ID: SE-954643 Date of Disbursement or Obligation Transaction ID: SE-954641	Mailing Address				''		2016
City State Zip Code 20036 Transaction ID : SE-954543 Date of Disbursement or Obligation	1/30 Knobe Island Ave., NVV				Amount		
Washington DC 20036 Transaction ID: SE-954643 Date of Disbursement or Obligation Purpose of Expenditure Media Production Name of Federal Candidate: Trump. Donald, J Catengory/ Type Od 11		TSIZIE	Zin Code				3568.00
Purpose of Expenditure Media Production Category/ Media Production Category/ Type Out Category/ Type Category/ Type Category/ Type Out Category/ Type Catego		1	'				
Media Production Support Type 004 11 01 2016			 		1		Obligation
Trump. Donald, J Calendar Year-To-Date Per Election for Office Sought 6893372.69 Disbursament For: i Primary K General 2016 Colher (specify) > 41739.50 (a) SUBTOTAL of Unitemized Independent Expenditures					11,	01	2016
Calendar Year-To-Date Per Election for Office Sought 6893372.69 Disburscment For: i Primary × General 2016 Other (specify) > 41739.50 (a) SUBTOTAL of Unitemized Independent Expenditures	Name of Federal Candidate:		Support	Office	e Sought:	House	District:
Per Election for Office Sought (a) SUBTOTAL of Itemized Independent Expenditures (a) SUBTOTAL of Unitemized Independent Expenditures (a) SUBTOTAL Independent Expenditures (b) Coher (specity) 41739.50 (c) SUBTOTAL Independent Expenditures (d) TOTAL Independent Expenditures (e) TOTAL Independent Expenditures (f) the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.	Trump. Donald, J.,		x Oppose	×	President	Senale	State:
(a) SUBTOTAL of Unitemized Independent Expenditures			6693372.69				y 🗡 General
(a) SUBTOTAL of Unitemized Independent Expenditures			·	<u> </u>	Other (s	pecity) -	
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. **Electronically Filed** Date 12 08 2018**	(a) SUBTOTAL of Itemized Independent Expenditures	5 - 141-140 - 000 - 0104 240440	a Pasabagas-monacon -mademonaco es y se ve	•			41739.50
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. **Brack Kells, C** [Electronically Filed] **Date 12 08 2018	(a) SUBTOTAL of Uniternized Independent Expenditu	res		•		,	
with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. **Trivit Kells, C **Flectronically Filed** Date 12 08 2018	{a} TOTAL Independent Expenditures			•		•	
PERCENDICUM PREMIUM DATE 12 08 2018	with, or at the request or suggestion of, any candid	ate or authorized	reported herein were of committee or agent of	not m of eithe	ade in coopera	ition, consults	ation, or concert is not a political
Date 12 do total	Ward Kells, C.	<i>[Electronically Fi</i>	ini)		g do	20	18
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24/48 HOUR REPORT OF INDEPENDENT E (Schiedule E)	XPENDITURES	PAGE 51 OF 52
NAME OF COMMITTEE (In Full)		FOR SE OF FORM 24/48
DCCC ·		FEC IDENTIFICATION NUMBER T
		C C00000935
Check if 24-hour report 24-hour report	New report Amends report filed	u y · u · · · · · · · · · · · · · · · ·
Full Name of Payer Screen Strategies Media, LLC.		Date of Public Distribution/Dissemination
Date of Dissemination: 10/18/	16	10 18 2016
Malling Address 11150 Fairfax Blvd		Amount
Suite 505		
City		134898.50
Fairlex V/	22030	Transaction ID : SE-952377 Date of Disbursoment or Obligation
Purpose of Expenditure Media Buy	Category/ Type 004	10 11 2016
Name of Federal Candidato	Support Office	e Sought: House District: 00
Donald J. Trump		President Senale State:
Calendar Year-To-Date Per Election for Office Sought	2613000.20 2016	Ursement For: Primary X General Other (specify) >
Full Name of Payee		Date of Public Distribution/Dissemination
Kully Hall, LLC		10 18 2016
Date of Dissemination: 10/18/	16 ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	10 18 2016
Mailing Address 1932 1st Ave. Suite 203		Amount
City Sta	te Zip Code	6225.00
Soatile	A 98101	Transaction ID : SE-952379 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production	Category/ Typa	10 18 2016
Name of Federal Candidate	Support Offic	e Sought: House District: 00
Conald J. Trump		President : Senate State:
Calendar Year-To-Date	Disb	ursement For: Primary X General
Per Election for Office Sought	2613000.20	Other (specily)
(a) SUBTOTAL of itemized Independent Expenditures	·	, 141123.50
(b) SUBTOTAL of Uniternized Independent Expenditures	• • • • • • • • • • • • • • • • • • •	
(c) TOTAL Independent Expenditures		
Under penalty of perjury I certify that the independent ex- with, or at the request or suggestion of, any candidate or party committee) any political party committee or its agent	authorized committee or agent of eithe	ade in cooperation, consultation, or concert r, or (if the reporting entity is not a political
Kelly C. Ward		, , , , , , , , , , , , , , , , , , ,
Signature	Date	19 2016

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24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES Schedule E)	PAGE 3 OF 3
,	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼
	C1 c00000935
Check if 24-hour report X 48-hour report X New report Amends report filed on	
1 Ruying Time 11 C	o of Public Distribution/Dissemination
Date of Dissemination: 10/11/16 Mailing Address 650 Massachusetts Avenuo, NW	10 11 2016
Suite 210	ount .
City State Zio Code	57500.00
Washington DC 20001 Tra	nsaction ID : SE-951439 o of Disbursement or Obligation
Purpose of Expenditure Media Buy Catogory/ Type O04	10 11 2016
Name of Federal Candidate Support Office Sou	ght: House District: 00
Trump, Donald, J., , Pres	ident Senate State:
Calendar Year-To-Date Per Election for Office Sought Disbursom 2016	ent For: Primary X Genoral Other (specify) >
	a of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 11150 Fairfex Blvd .	ount
Sulte 505	and the section of the afficient and the section of
	74632.00 / 74632.00 / 74632.00 / 74632.00 / 74632.00 / 74632.00 / 74632.00 / 74632.00 / 74632.00 / 74632.00
Purpose of Expenditure Media Buy Category/ Typo 004	10 11 2016
Name of Federal Candidate Support Office Sou	ght: House District: 00
Trump, Donald, J., . X Oppose X Pres	1
Calendar Year-To-Date Disbursom	ent For: Primary X Goneral
Per Election for Office Sought	Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	132132.00
(b) SUBTOTAL of Uniternized Independent Expenditures	grand of the second of the sec
(c) TOTAL Independent Expenditures	170032.00
Under penalty of perjury I certify that the independent expenditures reported herein were not made in with, or at the request or suggestion of, any candidate or authorized committee or agent of alther, or (party committee) any political party committee or its agent.	cooperation, consultation, or concert'
Ward, Kelly, C., . [Electronically Filed] Date 10	13 , 2016
Signature	1 \$

	4/48 HOUR REPORT OF INDEPENDENT EXPENDITURES Schedule E)	PAGE 17 OF 17
	<u> </u>	FOR SE OF FORM 24/48
	IAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼ C C00000935
CI	theck if 24-hour roport 48-hour report New report Amends report	rt liled on
	Full Name of Payoo Screen Strategies Media, LLC Date of Dissemination: 10/20/16	Date of Public Distribution/Dissemination
	Mailing Address 11150 Fairfax Blvd . Suite 505	Amount
	City State Zip Codo Fairfax VA 22030	Transaction ID : SE-952389 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy Category/ Type : 004	10 18 2016
•	Name of Federal Candidate Support Donald J. Trump X Oppose	Office Sought: House District: 00
	Calender Year-To-Date Per Election for Office Sought 2989611.20	Disbursement For: ☐ Primary ☐ General Other (specify) ▶
	Full Name of Payes AL Media LLC Date of Dissentination: 10/20/16	Date of Public Distribution/Dissemination
	Mailing Address 222 W Onterio St Suite 600	Amount
	City State Zip Code Chicago · IL 50654	140250.00 Transaction ID : SE-952071 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy Category/ Type Out	, 10 17 2016
	Name of Federal Candidate Support Donald J. Trump St. Oppose	Office Sought: House District: 00
	Calendar Year-To-Date Per Election for Office Sought	X: President Senate State: Disbursement For: ☐ Primary X General 2016 ☐ Other (specify) ▶
	(a) SUBTOTAL of Itemized Independent Expenditures	247290.00
	(b) SUBTOTAL of Uniternized Independent Expenditures	•
	(c) TOTAL Independent Expenditures	652070.38
	Under penalty of perjury I certify that the independent expenditures reported herein were nowith, or at the request or suggestion of, any candidate or authorized committee or egent of party committee) any political party committee or its agent.	not made in cooperation, consultation, or concert either, or (if the reporting entity is not a political
	Kelly C. Wurd Date	10 21 2016
	Signature	· · · · · · · · · · · · · · · · · · ·

24/48 HOUR REPORT OF INDEPENDEN' (Schedule E)	T EXPEND	ITURES			PAGE 15	OF 15
					FOR SE OF	F FORM 24/48
NAME OF COMMITTEE (In Full)				FEC	IDENTIFICATI	ON NUMBER V
DCCC				С	C00000935	
Check it 24-hour report 48-hour report	X New rep	ort Amends repo	ort filed	on	1 2 6 /	A Andrew
Edi Nama di Resa			 -	0		
Full Name of Payee Prism Communications, Inc.			1		blic Distribution	/Dissemination
Date of Dissemination: 10	0/27/16			"10"	27	2016
Mailing Address 1000 Potomac Street, NW				A		•
Suite 420				Amount		
City	State	Zip Code	$\neg \neg$			3291.58
Washington	DC	20007			n ID : SE-9539: bursament or (
Purpose of Expenditure Media Production		Category/ Type 004	-	" 10 [*]	26	2016
Name of Federal Candidate		Support	Office	Sought:	House	District: 00
Donald J. Trump		X Oppose	1	President	Senato	State:
	····	(/7) 0)100				
Calendar Year-To-Oate Per Election for Office Sought	45	50355.45	2016	rsement For:	Primary	/ !⊠! General
Full Name of Payee					blic Distribution	/Olssemination
76 Words Corp.				0 to	ر "هٔ ت	V · / y · · y ·
Date of Dissemination: 1	0/26/16			10	26	2016
Mailing Address 1121 5th St. NW			ļ	Amount	_	• •
Floor#1				A11100111		,
City	State	Zip Code				5500.00
Washington	DC	20001			ID : SE-95417 bursement or l	Obligation
Purpose of Expenditure		Category/ 004		9 <u></u> p	/ سے د ۱۰	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
Media Production		Type		10		2016
Name of Federal Candidate		Support	Office	Sought:	House	District: 00
Donald J. Trump		i∑i Oppose	X	President	Senate	State:
Calendar Year-To-Date		•		rsement For:	: [_] Primary	y 🔀 General
Per Election for Office Sought	2	4436718.92	2016	Other ((specify) 🕨	
			-			
(a) SUBTOTAL of Itemized Independent Expanditure	_		_		-	8791.58
(a) SOBTOTAL OF Remized incependent Expenditure	S	,	▶		, ,	- 1.
				•		. .
(b) SUBTOTAL of Uniternized Independent Expenditu	ures		" ▶	٠		
				-	-	
(c) TOTAL Independent Expenditures			··· ▶		d	771178.77
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candidat party committee) any political party committee or its	te or authorized					
Kelly C. Ward		•		u. / E		. 4.
Signature		_ Dáte	9 10	27	201 -	
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	1/48 HOUR REPORT OF INDEPENDENT EXPENDITURES chedule E)	PAGE 22 OF 25
AI/	AVE OF COMMITTEE III G.III	FOR SE OF FORM 24/48
	AME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
		C c00000935
CI	nack If [_] 24-hour report X 48-hour report X New report [_] Amends report	t filed on
_	Full Name of Payee	Date of Public Distribution/Dissemination
	Kully Hall, LLC Date of Dissemination: 10/12/16	10 1 12 2016
	Mailing Address 1932 1st Ave, Sulte 203	Amount
		Amount
	City Statu Zip Code	4297,00
	Scattle WA 98101	Transaction ID : SE-951665 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy Media Production Category/ Typo	10 14 2016
	Name of Federal Candidate Support	Office Sought: House District: 00 .
	Donald J. Trump	President Senate State:
		Disbursement For: Primary General
		2016 Other (spacity)
:	Full Name of Payee	Date of Public Distribution/Dissemination
	The New Media Firm, Inc.	10 12 2016
	Date of Dissemination: 10/12/16 Mailing Address 1730 Rhode Island Avo. NW	10 12 2016
	Mailing Address 1730 Rhode Island Avo., NW	Amount
	Suite 213	
	Cily State Zip Code Washington DC 20036	56930.43 Transaction ID : SE-951666
!	Purpose of Expenditure	Date of Disbursement or Obligation
	Media Buy Category/ Type Co4	10 12 2016
	Name of Federal Candidate Support	Office Sought: House District: 00
1	Donald J. Trump Oppose	President Schato State:
	Calendar Yoar To-Date	Disbursement For: Primary General
	Per Election for Office Sought 1721688.30	2016 Other (spocify) ▶
	(a) SUBTOTAL of Itemized Independent Expanditures	61227.43
	(b) SUBTOTAL of Unitemized Independent Expenditures	
	(a) 300101AL of Orintaritized Independent Chycholidica	
	(c) TOTAL Independent Expenditures	·
	Under penalty of perjury I certify that the Independent expenditures reported herein were n with, or at the request or suggestion of, any candidate or authorized committee or agent of party committee) any political party committee or its agent.	not made in cooperation, consultation, or concert either, or (If the reporting entity is not a political
	Kelly C. Ward	10 14 2016
	Signature Date	10 14 \ . 2010

Image# 201610149032527772
24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

	chedule E)	PAGE 21 OF 25 FOR SE OF FORM 24/48
ΝA	AME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
	OCCC	a digital and grammy managed and amplified any
		C C00000935
Ch	neck if 24-hour report	on 0 0 1 / 1 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4
	Full Name of Payee	Date of Public Distribution/Dissemination
	The New Media Firm, Inc. Date of Dissemination: 10/12/16	10 12 2016
	Mailing Address 1730 Rhode Island Ave., NW	
	Suite 213	Amount
	City State Zip Code	4047.25
	Washington DC 20036	Transaction ID : SE-951654 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy Media Production Category/ Type	10 12 2016
	Name of Federal Candidate Support Offic	e Sought: House District: 00
	Trump, Donald, J., ,	President Senate State:
	Calendar Year-To-Date Por Election for Office Sought Disb 2016	ursement For: Primary Seneral Other (specify)
	Full Name of Payee	Date of Public Distribution/Dissemination
	Screen Strategies Media, LLC Date of Dissemination: 10/12/16	10 12 2016
	Mailing Address 11150 Fairfax Blvd	Amount
	Suite 505	
	City State Zip Code Fairfax VA 22030	121850.00 Transaction ID : SE-951660
	Purpose of Expenditure Media Buy Category/ 1 004	Date of Disbursement or Obligation
	lype	i de la lamba de la companya di
	·	e Sought: House District: 00
	Trump, Donald, J., .	President Senate State:
	Calendar Year-To-Date Per Election for Office Sought 1721688.30 Dist. 2010	oursement For: Primary General Other (specify)
	(a) SUBTOTAL of Itemized Independent Expenditures	125897.25
	(b) SUBTOTAL of Uniternized Independent Expenditures	
	(a) TOTAL lades A D C coefficie	المدسيد بالشهيدين بداستان
	(c) TOTAL Independent Expenditures	ing the first form of the second of the seco
	Under penalty of perjury I certify that the independent expenditures reported herein were not m with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert er, or (if the reporting entity is not a political
	Ward, Kelly. C., , [Electronically Filed] Date	. M. / 'O' O
	Signature	

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24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

(Sc	chedule E)	PAGE 21 OF 25 FOR SE OF FORM 24/48					
	NAME OF COMMITTEE (In Full) DCCC C						
Ch	neck if 24-hour report New report Amends report lile	d on 10 14 2016					
		المدين المنصد على المسادرة المستصدر					
!	Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination					
	Mailing Address 1730 Rhode Island Ave., NW Suite 213	Amount					
	City State Zip Code	4047.25					
	Washington . DC 20036	Transaction ID : SE-952372 Date of Disbursement or Obligation					
	Purpose of Expenditure Media Buy Media Production Category/ Type	10 14 2016					
	Name of Federal Candidate Support Offic	ce Sought: House District: 00					
	Trump, Donald, J., ,						
	Calendar Year-To-Date Per Election for Office Sought Dist 2016	oursement For: Primary 🗶 General Other (specify) ▶					
	Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination					
	Malling Address 11150 Fairfex Blvd] term ' 'i					
	Suite 505	Amount					
	City State Zip Code	121850.00					
•	Fairfax VA 22030	Transaction ID : SE-952373 Date of Disbursement or Obligation					
	Purpose of Expenditure Media Buy Category/ Type Out Type	10 14 2016					
	Name of Federal Candidate Support Office	ce Sought: House District: 00					
	Trump, Donald, J., ,	President Senate State:					
	Calendar Year-To-Date Per Election for Office Sought Dist	oursement For: Primary K General 6 Other (specify)					
	(a) SUBTOTAL of Itemized Independent Expenditures	125897.25					
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	(b) SUBTOTAL of Unitemized Independent Expenditures	The same and a second s					
	(c) TOTAL Independent Expenditures	paragramping magazina paragrampina paragrampina di disebuah di dis					
	Under penalty of perjury I certify that the independent expenditures reported herein were not me with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.						
	Ward, Kelly, C., . [Electronically Filed] Date	10 18 2016					
	Signature	S S Miller Lat					

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 3 OF 3
	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼
	C C00000935
Check if 24-hour report 48-hour report New report Amends report filed on	THE PARTY OF A PARTY OF
Full Name of Payee Date	of Public Distribution/Dissemination
Buying Time, LLC Date of Dissemination: 10/11/16	10 11 2016
Mailing Address 650 Massachuselts Avenue, NW	na a se it Car f f
Suite 210	in organismical and programme and the second of the second
	57500.00 sction ID : SE-951439
	of Disbursement or Obligation
Name of Federal Candidate Support Office Sough	t: House District: 00
Donald J. Trump Oppose Preside	ont Senate State:
Calendar Year-To-Date Per Election for Office Sought 1459931.62 Disbursement 2016	t For: Primary General
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/12/16	of Public Distribution/Dissamination
Mailing Address 11150 Fairfax Blvd Amou	nt
City State Zip Code	74632.00
Fairlex VA 22030 Transa	ction ID : SE-951438 of Disbursement or Obligation
Purpose of Expenditure Modia Buy Category/ Type Type	10 11 2016
Name of Federal Candidate Sough	t: [] House District: <u>00</u>
Donald J. Trump Oppose Preside	ont Senate State:
Calendar Year To-Oate Per Election for Office Sought 1534563.62 Disbursement 2016	Hor: Frimary General
(a) SUBTOTAL of Itemized Independent Expenditures	132132.00
(c) TOTAL Independent Expenditures	170032.00
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cowith, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the party committee) any political party committee or its agent.	poperation, consultation, or concert the reporting entity is not a political
Kelly C. Ward Signature Date 10	13 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 50 OF 60
	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼
	C, c00000935
Check if [X 24-hour report] 48-hour report New report] Amouds report filed	ou " " 1 1 1 2 2 4 3 1 1 4 2 4 2 4 2 4 3 4 3 4 3 4 3 4 3 4 3 4 3
Full Name of Payee Screen Strategies Media, LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/25/16	10 25 2016
Mailing Address 11150 Faldax Blvd	Amount
Sulle 505	Amount
City State ZIp Code	121850.00
Fairfax VA 22030	Transaction ID : SE-952388 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004	, 10 18 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
	ursement For: Primary X General
Per Election for Office Sought ,4369947.93 1 2016	Other (specily)
Full Name of Payee	Date of Public Distribution/Dissemination
Buying Time, LLC	10 25 2016
Date of Dissemination: 10/25/16 Mailing Address 650 Massachusetts Avenue NW	, 10 25 2016
- God massacilisation money, inv	Amount
Suite 210 City State Zip Code	19691.00
Washington DC 20001	Transaction ID : SE-953229 Date of Disbursoment or Obligation
Purpose of Expenditure Category/ ! One	•
Media Buy Type 004	10 24 2018
Name of Federal Candidate Support Office	e Sought: House District: 00
Donald J. Trump X Oppose X	President Senate State:
	ursement For: Primary General
Per Election for Office Sought 4369947.93	Other (specify)
,	
(a) SUBTOTAL of Itemized Independent Expenditures	141541.00
	a francisco de la companya de la com
(b) SUBTOTAL of Uniternized Independent Expenditures	
	and the second s
(c) TOTAL Independent Expenditures	har to a farmer to he
Under penalty of perjury I certify that the independent expenditures reported horoin were not may with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert r, or (if the reporting entity is not a political
Kelly C. Wurd "Oate 1	0 25 2016
Signature	

	/48 HOUR REPORT OF INDEPENDENT EXPENDITURES		PAGE 57 OF 57
	chedule E)		FOR SE OF FORM 24/48
	AME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER ▼
L	· · · · · · · · · · · · · · · · · · ·		C c00000935
c	neck If 💢 24-hour report 🔲 48-hour report 💢 New report 🔲 Amends report	rt filed	on [""" (""") (["""")
	Full Name of Payoo		Date of Public Distribution/Dissemination
	Buying Time, LLC Date of Dissemination: 11/01/18]	11 01 2016
	Mailing Address 650 Massachusetis Avenue, NW		Amount
	Suito 210		landandar da dandar da ada da ada da ada da da da da da da
	City State Zip Code		17175.00
	Washington . DC 20001		Transaction ID: SE-954373 Date of Disbursement or Obligation
	Purpose of Expanditure Media Buy Category/ Type O04	.)	10 28 2016
	Name of Federal Cancidate Support	Office	Sought: House District: 00
	Donald J. Trump Oppose	X	President Senate State:
	Colendar Year-To-Date		rsement For: Primary 🔀 General
	Per Election for Office Sought 5894458.07	2016	Other (specify) >
	Full Name of Payee		Date of Public Distribution/Dissemination
	Screen Strategies Media, LLC Date of Dissemination: 11/01/16		11 01 PX 1
	Mailing Address 11150 Foirfex Blvd		المحتفظ المحتفظ
	Sulte 505		Amount
	City State Zip Gode		74850.00
	Fairfex VA 22030		Transaction ID : SE-954175 Date of Disbursement or Obligation
	Purpose of Expenditure Category/ Type 004		10 27 2016
	Name of Federal Candidate Support	Office	Sought: House District: 00
	Donald J. Trump Oppose	X	President Senale State:
	Calendar Yoar-To-Date		rsement For: Primary Goneral
	Per Election for Office Sought 5894458.07	2016	Other (specify)
ı			
	(a) SUBTOTAL of Itemized Independent Expenditures	• •	92025.00
	The CUBTOTAL of Uniterstand Indonesian Europelitude		
	(b) SUBTOTAL of Unitemized Independent Expenditures	· •	
	(c) TOTAL Independent Expenditures	•	14333615.05
	Under penalty of perjury I certify that the independent expenditures reported herein were rewith, or at the request or suggestion of, any candidate or authorized committee or agent of party committee) any political party committee or its agent.	not ma	de In cooperation, consultation, or concert , or (if the reporting entity is not a political
	Kelly C. Ward	F'0"	فمصفاتهما فالمساهمة
	Signature	1. 1	02 2016

Image# 201611069037127397 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

(Schedule E) PAGE 11 OF 12 FOR SE OF FORM 24/48					
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼ C C00000935				
Check if X 24-hour report 48-hour report New report Amends report file	ed on Lith (OTO , VITTO				
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/05/16	Date of Public Distribution/Dissemination				
Mailing Address 11150 Fairfax Blvd Suite 505	Amount				
City State Zip Code Fairfax VA 22030	58700.00 Transaction ID : SE-954453				
Purpose of Expenditure Media Buy Category/ Type 004	Date of Disbursement or Obligation				
Name of Federal Candidate Support Offi	ice Sought: House District: 00				
Calendar Year-To-Date Dis	President Senate State: Sourcement For: Primary General				
Per Election for Office Sought 6526208.19 201 Full Name of Payeo	Other (specify) Date of Public Distribution/Dissemination				
Canal Partners Media, LLC Date of Dissemination: 11/06/16	11 06 7 Y Y Y Y Y				
Mailing Address 25 Whitlock Place Suite 200	Amount				
City State Zlp Code Marietta GA 30064	7910.00 Transaction ID : SE-954884 Date of Disbursoment or Obligation				
Purpose of Expenditure Media Buy Calegory/ Type 004	11 03 2016				
Truma Deceld I	fice Sought: House District: 00 X President Senate State:				
Calendar Year-To-Date Per Election for Office Sought 6648199.19 Dia 20	sbursement For: Primary General Other (specify) >				
(a) SUBTOTAL of Itemized Independent Expenditures	66610.00				
(b) SUBTOTAL of Unitemized Independent Expenditures					
(c) TOTAL Independent Expenditures					
Under penalty of perjury I certify that the independent expenditures reported herein were not with, or at the request or suggestion of, any candidate or authorized committee or agent of ell party committee) any political party committee or its agent.	made in cooperation, consultation, or concert her, or (if the reporting entity is not a political				
Ward, Kelly, C [Electronically Filed] Date Signature	11 06 2016				

Image# 201610189033039653 24/48 HOUR REPORT OF INDE Schedule E)	PENDENT EXPEN	DITURES	PAGE 19 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			FEC IDENTIFICATION NUMBER V
Check if 24-hour report	ır roport 🄀 🗌 New r	oport 🗷 Amends repo	ort filed on 10 14 2016
Full Name of Payee Ralston Lapp Media, LLC Date of Dis	semination: 10/14/16		Date of Public Distribution/Dissermination
Mailing Address 1054 31st Street, NW Suite 430			Amount
City Washington	State DC	Zip Code 20007	Transaction ID : SE-951677 Date of Disbursement or Obligation
Purpose of Expenditure Media Production		Category/ Type 004	10 14 2016
Name of Federal Candidate Hurd, William, , ,		Support Coppose	Office Sought: House District: 23 President Senate State: TX
Calendar Year-To-Date Per Election for Office Sought		1648833.65	Oisbursement For: Primary Seneral 2016 Other (specify)
Full Name of Payee Buying Time, LLC Date of Dis	ssernination: 10/14/16		Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Sulte 210	Avenue, NW		Amount
City	State DC	Zip Code 20001	53000.00 Transaction ID : SE-952374
Washington Purpose of Expenditure			Date of Disbursement or Obligation
Media Buy		Category/ Type 004	10 13 2016
Name of Federal Candidate		Support	Office Sought: House District: 00
Trump, Donald, J., ,	•	X Oppose	Fresident Senate State:
Calendar Year-To-Date Per Election for Office Sought		1919459,68	Disbursement For: Primary General 2016 Other (specify) ▶
(a) SUBTOTAL of Itemized Independen	nt Expenditures		> 65260.71
(b) SUBTOTAL of Unitemized Independent	dent Expenditures		··· • • • • • • • • • • • • • • • • • •

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

(c) TOTAL Independent Expenditures.....

Ward, Kelly, C., .	[Electronically Filed]	Date	10	18	2016
Signature			peres	hadred.	Terror Consultation and

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24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES							
(Schedule E)			PAGE 52 OF FORM 24	52 1/48			
NAME OF COMMITTEE (In Full) FEC IDENTIFICATION NUMBER ▼							
DCCC							
			C C00000935	الب			
Check if 24-hour report 😿 48-hour	report 🔭 🗷 New rep	port Amends repo	on filed on				
Full Name of Payee The New Media Firm, Inc.	10 404046		Date of Public Distribution/Dissemina	أمششط			
Mailing Address 1730 Rhode Island Ave	emination: 10/18/16		10 18 2016	الســــــــــــــــــــــــــــــــــــ			
Suite 213	., 14**		Amount				
City	State	Zip Code	3407	A7			
Washington	DC	20036	Transaction ID : SE-952382 Date of Disbursement or Obligation	السنة			
Purpose of Expenditure Media Buy Media Production		Category/ Type	10 18 / 201				
Name of Federal Candidate		Support	Office Sought: House District:	00			
Trump, Donald, J., ,			President Senate State: _				
Calendar Year-To-Date Per Election for Office Sought		2613000.20	Disbursement For: Primary X G	eneral			
Per Election to: Onice Sought			Other (specify) >				
Full Name of Payee Buying Time, LLC	•		Date of Public Distribution/Dissemina	ation			
Date of Diss	emination: 10/18/16		10 18 201	6			
Mailing Address 650 Massachusetts A	lvenue, NW		Amount				
City	State	Zip Code	83829.	.00			
Washington	DC	20001	Transaction ID : SE-952073 Date of Disbursement or Obligation	السليدا			
Purpose of Expenditure Media Buy		Category/ Type 004	10 ^u 10 ^u 17 ^D 1201	6			
Name of Federal Candidate		Support	Office Sought: House District:	00			
Trump, Donald, J., ,		✓ Oppose	President Senate State: _				
Calendar Year-To-Date Per Election for Office Sought		2613000.20	Disbursement For: Primary X G	General			
Fai Cisculati (di Cinas Congri	المساسية المساسة المساسية		Other (specify)				
(a) SUBTOTAL of Itemized Independent	Expenditures		87236.6	87			
(b) SUBTOTAL of Uniternized Independent	nt Expenditures	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	··· >				
(c) TOTAL Independent Expenditures			14150400				
(C) IVIAL HUBPHINGH EXPENDITIES			11152409.	38			
Under penalty of perjury I cortify that the with, or at the request or suggestion of, party committee) any political party committee.	any candidate or authorize	s reported herein were id committee or agent o	not made in cooperation, consultation, or cool either, or (if the roporting entity is not a po	oncert olitical			
Ward, Kelly, C., ,	/Electro	nically Filed Date	a 10 19 2016				
Signature	Į į į į	Many 1 mm/ Date					

24/48 HOUR REPORT OF INDEPENDE	NT EXPEND	DITURES		PAGE 52 OF 60		
(Schedule E)				FOR SE OF FORM 24/48		
NAME OF COMMITTEE (In Full)		······································		FEC IDENTIFICATION NUMBER V		
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Full Name of Payon	·· · · · · · · · · · · · · · · · · · ·		Data of	Public Distribution/Dissemination		
Screen Strategies Media, LLC	•			. With the cold a hard are discount		
Date of Dissemination	: 10/25/16		1] 1	0 25 2016		
Mailing Address 11150 Fairfax Blvd			Amount	1		
Suite 505				ومومونيس والمادان والأراب		
City	State	Zip Code	1	64326.00		
Fairfax	VA	22030		ction ID : SE-953184 Disbursement or Obligation		
Purpose of Expenditure		Category/		A COMPANY OF CONCESSION		
Modia Buy		Type : 004	, ,	2018		
Name of Federal Candidate		Support	Office Sought:	House District: 00		
Donald J. Trump		Oppose	Presiden	t Senate State:		
Calendar Year-To-Date			Disbursement			
Per Election for Office Sought		369947.93	2016	er (specily) >		
Call Marin of Page	3.					
Full Name of Payco Buying Time, LLC			1	Public Distribution/Dissemination		
Date of Dissomination	: 10/25/16			0 25 2016		
Mailing Address 650 Massachusetts Avenue, N	w		Amoun	T i e e f fin des manus munif,		
Sulte 210			\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \			
City	State	Zip Code		62488.00		
Washington	DC	20001	Transac	tion ID: SE-953185 Diabursament or Obligation		
Purpose of Expenditure		Category/ 1				
Media Buy		Туре 004	,",	21 2016		
Name of Federal Candidate		<u> </u>	1 200 2	(-1.)		
Donald J. Trump		Support	Office Sought:			
		Oppose	X Presiden	······································		
Calendar Year-To-Date		4260047.02	Disbursoment	For: Primary X General		
For Election for Office Sought	, , ,	4369947.03	Oth	er (specify) >		
(a) SUBTOTAL of itemized independent Expenditu	ıres		· •	126814.00		
(b) SUBTOTAL of Unitermized Independent Expend		************		and the second		
			• •	أتتأه وخمصات ما فالتاري		
(c) TOTAL Independent Expenditures	*************	****************************				
	•		•	the same said		
Under possity of portury I certify that the indeposition expanditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or sutherized committee or agent of either, or (if the reporting entity is not a political						
party committee) any political party committee or its agent.						
Relly C. Word		Oate	: "10" ' i '	25 1 2016		
Signature		Othe	10			