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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.⁶ 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.⁷

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).

⁵ 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 Sec, 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 Ian Russell)..

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

¹⁰ 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=WCx30bETyrE. The advertisement in MUR 7182 can be found here: https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

[&]quot; 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.youtube.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=HIxNUxf-t80. The advertisement in MUR 7179 can be found here: https://www.youtube.com/watch?v=OpdllznhrF4. The advertisement in MUR 7188 can be found here: https://www.youtube.com/watcli?v=epFwW3WyOWo. 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. 14 Bccause the ads would refer to Trump, the staff and campaigns were instructed not to coordinate them with HFA or its agents. 15 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. 16 The declarations demonstrate also that there was no coordination through any common vendor, former employee or independent contractor. 17

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."18 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."19 The Commission has repeatedly and consistently applied this regulation when evaluating communications that refer to multiple candidates.²⁶ 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).21 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?y=RriiljNAe-1. The advertisement in MUR 7187 can be found here: https://www.youtube.com/watch?v=8DN@EgLEECA. See Exhibit B.

14 See Exhibit A.

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).

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. 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. 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.

В. 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.

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. 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.

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

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

" 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.

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

³⁶ 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.

Dangerous for PA Women, YouTube (Oct. 20, 2016) at :20 ("Say No To Donald Trump & Brian Fitzpatrick"), https://www.youtube.com/watch?v=7inb2DsowG00; 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 Gallagher either"), https://www.youtube.com/watch?v=LS-gU95vm9U; 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)

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=WGx3ObETyrE; Bryan Caforio for Congress, Stand Up, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), https://www.youtube.com/watch?v=il8196BhvWg&feature=youtu.be.

¹⁹ 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=GICZwJ3tYXw.

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. ⁴⁸ 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. 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,

Mr. B

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 Jennifer 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 Carnpaigns 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 2/4 day of December, 2016.

Micheel Ian Russell

Exhibit B

SCHEDULE F. (FEC Form 3X) ITEMIZED COORDINATED PARTY F

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

TOTAL This Period (last page this line number only).........

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 YES NO Mailing Address If YES, name the designating committee: 430 South Capitol Street, SE Democratic National Committee & 2nd Floor State ZIP Code Pennsylvania Democratic Party Washington DC 20003-4024 Full Name (Lest, First, Middle Initial) of Each Payes : Memo Item Purpose of Expenditure Media Services Mundy Katowitz Media, Inc. Calegory/ Malling Address 1322 G Street, SE Type Date City State Zip Code "21⁶ 10 2016 Washington DC 20003 Name of Fuderal Candidate Supported Office Sought: House State: .PA Amount 16 Harlman, Christina, . . Sonate District: Presidential 96070.00 Aggregate General Election 96070.00 Expenditure for this Candidate > Transaction ID: SF-953178 Full Name (Last, First, Middle Initial) of Each Payce Purpose of Expenditure C Memo Item Category/ Туре Mailing Address Date State Zip Code City Name of Federal Candidate Supported Office Sought: State: · House Amount Sanate District: .. Presidential Aggregate General Election Expenditure for this Candidate >. Full Name (Last, First, Middle Initial) of Each Payee Purpose of Exponditure . ! Memo Item Category/ Type Mailing Address Date Zip Code City Stale Name of Fuderal Candidate Supported Office Sought: House State: Amount Sonate District: Presidential Aggregate General Election Expenditure for this Candidate 96070.00 SUBTOTAL of Expenditures This Page (optional).....

PAGE 109105 OF 109107

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

TOTAL This Period (last page this line number only)......

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 Hac your committee been designated to make Full Name of Subordinate Committee coordinated expenditures by a political party committee? DCCC K YES . NO Mailing Address If YES, name the designating committee: 430 South Capitol Street, SE Democratic National Committee & 2nd Floor State ZIP Code: Michigan Democratic Party Washington 20003-4024 DC Full Name (Last, First, Middle Initial) of Each Payoe : ' Memo Item Purpose of Expenditure Media Services Three Point Media, LLC Category/ Mailing Address 1000 Potomac Street, NW Date Suite 500 Zip Code City Stato ຶ 13້ 2016 10 Washington OC 20007 Name of Federal Candidate Supported Office Sought: |x | House State: Amount 97 Driskell, Gretchen, . . Senate District: Presidential 1000.00 Aggregate General Election 96200.00 Expendituro for this Candidate Transaction ID : SF-951470 Full Name (Last, First, Middle Initial) of Each Payce Purpose of Expenditure : i Memo Item Media Services Mundy Katowitz Media, Inc Category/ Mailing Address 1322 G Street, SE Туро Date Zip Code State 13 2016 10 Washington DC 20003 Plame of Foderal Candidate Supported Office Sought: | * House State: _ Amouni Senate 07 Driskeli, Grotchen, . . Olstrict: Presidential 95200.00 Appregate General Election 96200.00 Expenditure for this Candidate Transaction ID: SF-951459 Full Name (Last, First, Middle Initial) of Each Payes Purpose of Expenditure 1 i Memo Item Media Services Buving Time, LLC Calegory/ Тура Mailing Address 650 Massachusetts Avenue, NW Suite 210 Date Zip Code City State 10 2016 Washington DC 20001 Name of Federal Candidate Supported Office Sought: | x : House State: Amount 08 Shkreli, Suzanna, . . Senate District: Presidential 52960.00 Aggregate General Election 52560,00 Expenditure for this Candidate > Transaction (O: SF-952064 149160.00 SUBTOTAL of Expenditures This Page (optional)......

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 109107 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 K YES ☐ NO If YES, name the designating committee: Mailing Address 430 South Capitol Street, SE 2nd Floor **Democratic National Committee** City State ZIP Code Washington 20003-4024 DC: Full Name (Last, First, Middle Initial) of Each Payoe ■ Memo Item Purpose of Expenditure Media Services Murphy Vogel Askew Reilly, LLC Catogory/ Type Mailing Address 1199 N. Fairfax St Date Suite 220 City State Zip Code 24 10 2016 Alexandria VA 22314 Name of Federal Candidate Supported Office Sought: x House State: WI Amount 80 Nelson, Tom, , , Senate District: 1000.00 **Prosidential** Aggregate General Election 33700.00 Expenditure for this Candidate Transaction ID: SF-953282 Full Name (Last, First, Middle Initial) of Each Payee Purpose of Expenditure ☐ Memo Item Category/ Mailing Address Type Date Zip Code City State Name of Federal Candidate Supported Office Sought: House State: Amount Senate District: Presidential Aggregate General Election Expenditure for this Candidate Purpose of Expenditure Full Name (Last, First, Middle Initial) of Each Payee Memo Item Category/ Type Mailing Address Date City State Zip Code Name of Federal Candidate Supported Office Sought: House State: Amount Senate District: Presidential Aggregate General Election Expenditure for this Candidate 1000.00 SUBTOTAL of Expenditures This Page (optional)....... 1543282.59 TOTAL This Period (last page this line number only).....

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

(To be use	d only	by Po	litical Comn	nittees in	the Gene	ral Election) FOR L	INE 25	OF FORM 3X
NAME OF COMMITTEE (In Full)								 		
DCCC										
Has your committee been designated to	make ·		Full N	ame of Subc	ordinate Co	ommittee				
coordinated expenditures by a political party committee?				occc						
If YES, name the designating committee	:	ľ	Mailin	Address	430 Soull	Capitol S	Street, SE			
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			•	inglon				DC		3-4024
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Adelstein & Associa						my nem	Media S			Category/
Mailing Address 222 West O	ntario Stree	et, Suite	600				Date			Туре
City Chicago		State		Zip Code 60654			10	13	100	2016
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PAGE 47535 OF 47535

lmage# 201610209034264673

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

	(To be us	ed only	by Po	olitical Comm	mittees in the Gen	eral Election) FOR L	INE 25 C	F FORM 3X
NAME OF COMMITTEE (In Full)									
DCCC	• •						•		
las your committee boon designated to make Full Name of Subordinate Committee									
coordinated experiditures by a political party committee? ** YES NO				DCCC					
YES, name the designating committee			Mailin	g Address	430 South Capitol	Street, SE			
Democratic National Com			City		2nd Floor		State	I ZIP Co	de
California Democratic Part	у		1 "	hington			DC	20003	
Full Name (Last, First, Middle Initia	-	Payes			Memo Item		Expenditure		
The New Media Firm, Ir	ic.					Media S	ervices	1	0-1
Mailing Address 1730 Rhode Island Sulte 213	Ave., NW				······································	Date	 -		Category/ Type
Gity		State		Zip Code		09	20		016
Washington	and I	DC		20036					V10
Name of Federal Candidate Suppor Applegate, Doug, Loren, .	Office	e Sougi	nt: 🗶	House Senate	State: CA District: 49	Amount			
Appregate, Doug, Caren, .	1			Presidential	District:	1		. 91	200,00
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						4		- 1	Category/
Mailing Address 11150 Fain Suite 505	ax Blvd					Date			Type
City		State		Zip Code] ·			
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Caforio, Bryan, . ,	Onic	e Soug	nt: 🗯	House Senale	State: <u>CA</u> District: 25	Amount			
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Suite 505						Date		·	
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Fairfax Name of Federal Candidate Support	· ·			22030				201	•
Caforio, Bryan;	Office	e Sougi	n: #.	House Senate	State: CA District: 25	Amount			
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TOTAL This Period (last page this line	number o	n(v)							

PAGE 83515 OF 63518

Exhibit C

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF MAURA JOHNSON - MUR 7.179

- 1, Maura Johnson, do declare and state as follows:
 - During the 2016 election, as a Media 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:

July 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 <u>31</u> 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;
- 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 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 Zerd day of December, 2016.

David Dixon

Richard D

Exhibit D

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	<u></u>
(Schedule E)	PAGE 9 OF 9 FOR SE OF FORM 24/48
NAME OF COMMITTEE (in Full)	FEC IDENTIFICATION NUMBER V
DCCC	C coopposs
Check if 24-hour report 48-hour report New report Amends report filed of	ou hand hand
Full Name of Payee Old Towne Media	Date of Public Distribution/Dissemination
Date of Dissemination: 10/19/16 Mailing Address 4507 Penwood Dr	10 19 2016
C307 Peliwood D7	Amount
City State Zip Code	48000.00
	Transaction to : SE-952383 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:
Calendar Year-To-Date Per Election for Office Sought 2742321.20 Disburs 2016	sement For: Primary General Other (specify)
Full Name of Payee AL Media, LLC Date of Dissemination: 10/19/16 Mailing Address 222 West Ontario Wost	Date of Public Distribution/Dissemination
Suite 600	Amount
City State Zip Code	81321.00
Chicaga ÍL 60654	Fransaction ID : SE-952867 Date of Disbursement or Obligation
Purpose of Expenditure Mndla Buy Category/ Type O04	10 14 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Oppose Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought Disbury 2742321.20 2016	soment For: Primary General Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	المن المن المن المن المن المن المن المن
(b) SUBTOTAL of Unitermized Independent Expenditures	وها المحمد موسط والمحروب المحروب المراد المواجع المحروب المواجع المحروب المحروب المحروب المحروب المحروب المحروب
(c) TOTAL Independent Expenditures	273146.39
Under ponalty of perjury I certify that the independent expenditures reported horein were not mad 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.	le in cooperation, consultation, or concert or (If the reporting antity is not a political
Kelly C. Ward Signature Date 10	21 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
(Schedule E)	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 Amends report filed or	I WANT ! REAL ! LA LALLE !
	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/24/16	10 24 2016
Mailing Address 11150 Fairlax Blvd	
Suite 505	
City State Zip Code	45000.00
Fairfax VA 22030 T	ransaction ID : SE-952072 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type U04 Type	10 7 7 2016
Name of Federal Candidate Support Office S	ought: House District: 00
Donald J. Trump Oppose Pr	resident Senate State:
Calendar Year-To-Date Per Election for Office Sought Disburse 2016	emeni For: Primary K General Other (spocify)
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media LLC	IN OF IT THE STREET BETTER
Date of Dissemination: 10/24/16 Mailing Address 222 W Optatio St	10 24 2016
A A A A A A A A A A A A A A A A A A A	Amount
Suite 600 City State Zip Code	131250.00
Chicago IL 50654 Tr	ansaction ID : SE-953187 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 1 004 1	10 21 2016
Name of Federal Candidate Support Office S	ought: House District: 60
Donald J. Trump Oppose Po	resident Senate State:
2016	ement For: Primary X General
Per Election fur Office Sought 3653174.61 , 2016	Other (specify)
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(a) SUBTOTAL of Itemized Independent Expenditures	176250.00
(b) SUBTOTAL of Unitemized Independent Expenditures	والأعلى المستقد الأعلاء المارات
(a) SOBTOTAL of Unitemized Independent Expenditures	a (a band) a cada "aasa sa
(c) TOTAL Independent Expenditures	The state of the s
Under penalty of perjury I certify that the independent expanditures reported herein were not made with, or at the request or suggestion of, any candidate or authorized committee or agent of either, o party committee) any political party committee or its agent.	in cooperation, consultation, or concert or (if the reporting entity is not a political
Kelly C. Ward	in british set
Signature Date 10	25 1 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	[2105 st 05 00
(Schedule E)	PAGE 51 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER Y
DCCC	C C00000935
	[C] c00000935
Check II 24-hour report 348-hour report New report Amends report filed on	[11 - 11] [10 a 19] 1 LA LALLA ALA
Full Name of Payee Da	ate of Public Distribution/Dissemination
AL Media LLC Date of Dissemination: 10/25/16	10 25 2016
Mailing Address 222 W Ontario St	25 2016
An	nounl
Suite 600	a tert - alternational unifemplamenten-harred
City State Zip Code	9000.00
Chicago IL 60654 Tra	ansaction ID : SE-953228 ite of Disbursement or Obligation
Purpose of Expenditure Modia Buy Category/ Type Category/ Type	10 24 2018
Namo of Federal Candidate Support Office So	ught: House District: 00
Donald J. Trump Oppose Pre	· (
Calendar Year-To-Date Per Election for Office Sought 4369947.93 42016	nont For: Primary Goneral Other (specify)
Full Name of Payee	ato of Public Distribution/Dissemination
Canal Partners Media, LLC	
Date of Dissemination; 10/25/16	10 25 2016
Mailing Address 25 Whillock Place . An	natini
Suite 200	· . · · · · · · · · · · · · · · · · · ·
City State Zip Code	184082.00
Marietta GA 30064 Tro	nsaction IO : SE-952497 nic of Disbursement or Obligation
Purpose of Expenditure Calegory/	10 19 2016
Media Buy Type i	10 19 2016
Name of Federal Candidate Support Office So	ught:
Donald J. Trump	sident Senate State:
	nent For: Primary X General
369947.93 2016 i	Other (specify)
lus.	(1900)
	Annual conference of the confe
(a) SUBTOTAL of Itemized Independent Expenditures	193082.00 f
	e am and to when the meaning
(b) SUBTOTAL of Unitamized Independent Expenditures	السفرينسيس وأساس
	ا بالمستعدد المسا
(c) TOTAL Independent Expenditures	السابق بيسريون
Under penalty of perjury I certify that the independent expenditures reported herein were not made it	n 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.	i
Math. 21 March	
Kelly C, Ward Date 10 (25 2016
Signature	

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
(Schedule E)	PAGE 23 OF 23 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER
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	[C] connos35
Check if 24-hour report 48-hour report New report Amends report t	ited on
Full Name of Payer	Date of Public Distribution/Dissemination
Moore Campaigns, LLC	10 28 2016
Malling Address 447 Irving St, NW	
·	Amount
City State Zip Code	4472.36
Washington OC 20010	Transaction io : SE-954234 Duto of Disbursement or Obligation
Purpose of Expenditure Mall Services Category/ Type 008	10 27 2016
Name of Federal Candidato Support O	flice Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calendar Year To-Date	Isbursoment For: Primary General
Per Election for Office Sought 4593586.81 20	Other (specify) >
Full Name of Payee	Opto of Public Distribution/Dissemination
AL Media LLC	10 28 2016
Mailing Address 222 W Onlario St	10 28 2016
Suito 600	Amount
City State Zip Code	30525.00
Chicago IL 60654	Transaction ID ; SE-953928
Purpose of Expenditure Category/ DA	Date of Disbursement or Obligation
Media Buy Type 004	10 26 2016
· • · · · · · · · · · · · · · · · · · ·	ffice Sought: House District: 00
Donald J. Trump Oppose .	President Senato State:
	sbursement For: Primary X General
Per Election for Office Sought 4593586.81 20	Other (specify) >
(e) SUBTOTAL of Itemized Independent Expenditures	34997.36
	the state of the s
(b) SUBTOTAL of Unitermized Independent Expenditures	
	وسائق فيتمانيساره بالمنتهساء سوادات
(c) TOTAL Independent Expenditures	1588663.18
Under partitly of parjury I cartily that the independent expenditures reported herein were not with, or at the request or suggestion of, any candidate or authorized committee or agent of eit party committee) any political party committee or its agent.	made in cooperátion, cunsultation, or conceri thor, or (if the reporting antity is not a political
Kelly C. Ward	ចែក ដើម្រូវ សំខេល្ជី ត្រួយីស្គី ស្គីស្គី
Signature Date ;	10 1 29 2016

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	FEC IDENTIFICATION NUMBER ▼ C c00000935
Check If 24-hour report 48-hour report New report Amends report fi	led on [1] / Date / Yarray
Full Name of Payee Adelstein & Associates LLC Date of Dissemination: 10/31/16	Date of Public Distribution/Dissemination
Mailing Address 222 West Ontario Street, Sulte 600	Amount
City State Zip Code Chicago IL 60654	80000.00 Transaction ID : SE-954371
Purpose of Expenditure Category/ Type 004	Date of Disbursement or Obligation 10 28 2016
Trum Donald I	ffice Sought: House District: 00 * President Senate State:
Calendar Year-To-Dale	sbursement For: Primary General Other (specify)
Full Name of Payee Adelstein & Associates LLC Date of Dissemination: 10/31/16	Date of Public Distribution/Dissemination
Mailing Address 222 West Ontario Street, Suite 600	Amount
City State Zlp Code Chicago IL 60654	Transaction ID : SE-954372 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Typo 004	10 28 2016
Towns Decold 1	Mice Sought: House District: 00 My President Senate State:
	isbursement For: Primary General Other (specify) ☐
(a) SUBTOTAL of Itemized Independent Expenditures	147387,50
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	and and a little death of the d
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 el party committee) any political party committee or its agent.	
Ward, Kelly, C., . [Electronically Filed] Date	10 31 2016
Signature	

24/48 HOUR REPORT OF INDEPENDEN (Schedule E)	T EXPEND	ITURES		PAGE 51	OF 52 FORM 24/48
NAME OF COMMITTEE (In Full)			1,	FEC IDENTIFICATION	
DCCC -			}`	_	in itolinger v
				C C00000935	
Check if 24-hour report 2 48-hour report	New rep	oort Amends repo	ort filed on	9 ' B &	* *
Full Name of Payee			Date of	Public Distribution/	Dissemination
Screen Strategies Media, LLC Date of Dissemination: 1	0/18/16		×,	10 18	2016
Mailing Address 11150 Fairfax Blvd					33.0
Suite 505			Arnoun	1	
City	Stale	Zip Code			134898.50
Fairlax	VA	22030	Transa	clion ID : SE-95237	7
Purpose of Expenditure				Disbursement or O	bligation
Media Buy		Category/ Type 004	1	10 11	2016
Name of Federal Candidate	· · · · · · · · · · · · · · · · · · ·	Support:	Office Sought:	House [District: 00
Donald J. Trump		X Oppose	Presiden	nt Senate	State:
Calendar Yeor-To-Oato				For: i Primary	X General
Fer Election for Office Sought	, 2	613000.20	1 2016	ner (spacify) >	1
Full Name of Payee	<u> </u>			Public Distribution/	Discomination
Kully Hall, LLC		•	i Dale of		Jissemmation
Date of Dissemination: 1	0/18/16		- . '	10" 18"	2016
Mailing Address 1932 1st Ave. Suite 203			Аточп	1	
City	State	Zip Code			6225.00
Scattle	WA	98101		tion ID : SE-952379 Disbursement or O	
Purpose of Expenditure Media Buy Media Production		Category/ Type		30 ¹² 18 0	2016
Name of Federal Candidate		Support	Office Sought:	: House (District: 00 ·
Donald J. Trump		X. Oppose	Y Presider	ગ ૄિં√ Schate	State:
Calendar Year To-Date		2613000.20		For: Primary	
Par Election for Office Sought	, '	2010000.20		ner (specily) 🕨 🔔	
(a) SUBTOTAL of flemized Independent Expenditure			. >		1411 23.50
(b) SUBTOTAL of Uniternized Independent Expendit	ures	***************************************	· >	•	
(c) TOTAL Independent Expenditures			•		
Under penalty of perfury I certify that the independe with, or at the request or suggestion of, any candida party committee or its	te or authorized	reported herein were d coinmittee or agent o	not made in co	operation, consultation reporting entity is	on, or concert not a political
Kelly C Ward			. h		
a describige and administrative and the statement of		Date	10	19 2016	5
Signature					

24/48 HOUR REPORT OF INDEPENDE (Schedule E)	NT EXPE	ENDITURES		PAGE 48 OF 60
				FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC				FEC IDENTIFICATION NUMBER T
1 5000	••			C C00000935
		· · · · · · · · · · · · · · · · · · ·		
Check if 24-hour report 248-hour roport	X Ne	w report , + Amends rep	ort filed	ton
Full Name of Payer		•		Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination:	10/24/16		4 T	10 24 2016
Mailing Address 11150 Fairfax Blvd		·	;	Amount
Suite 505	•			Alloon
City	State	Zip Code		45000.00
Fairfax	VA	22030 .		Transaction ID : SE-952072 Date of Disbursement or Obligation
Purpose of Expanditure Media Buy		Calegory/ Type 004		10 17 2016
			احب حنود	
Name of Federal Candidate		Support	Office	e Sought: House District: 00
Donald J. Trump		X Oppose	×	President , Senate State:
Gelondar Year-To-Date		——————————————————————————————————————	Dish	resement For: Primary X General
Per Election for Office Sought	,	3653174.61	2016	Other (specify)
Full Name of Payee			<u></u>	Oate of Public Distribution/Dissemination
AL Media LLC				
Date of Dissemination:	10/24/16			10 24 2016
Malling Address 222 W Ontario St				Amount
Suite 600		,		
City	State	Zip Code		131250,00
Chicago	il.	60654		Transaction ID : SE-953187 Date of Disbursement or Obligation
Purpose of Expenditure	•	Category/ 004		10 21 2016
Media Buy		i Type oo.		10 21 2016
Name of Federal Candidate		Support	Office	e Sought: House District: 00
Oonald J. Trump		X: Oppose	×	President Senale State:
Calendar Year-To-Date			Disb	ursement For: Primary X General
Per Election for Office Sought	;	3653174.81	2016	Cther (specify)
				Cirici (specify)
(a) SUBTOTAL of Itemized Independent Expenditu	res		▶	178250.00
				•
(b) SUBTOTAL of Unitermized Independent Expend	litures		·· >	
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(c) TOTAL Independent Expanditures			▶	, , ,
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Under penalty of perjury I certify that the independ with, or at the request or suggestion of, any candid	sent expendi late or Autho	tures reported herein were orized committee or acent o	im Ion edile in	r, or (if the reporting entity is not a political
party committee) any political party committee or its				
		•		
Kelly C. Ward	`	0	, ,	0 25 20:6
Signature	•	Date	• '	5 20 20.U

24/48 HOUR REPORT OF INDEPENDEN	IT EXPEN	DITURES		PAGE 52 OF 60
(Schedule E)				FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			FEC	IDENTIFICATION NUMBER *
DCCC			С	C00000935
Check if 24-hour report 48-hour report	X New 16	pport Amenda repo	ort filed on	U E 7 1 7 7
Full Name of Payer Screen Strategies Media, LLC Date of Dissembation:	10125115		i i	olic Distribution/Dissomination
Mailing Address 11150 Fairiax Blvd	10/23/10	··		25 2016
Suite 505			Amount	
City	State	Zip Code		, 64326.00
Fairfax .	VA	22030	Transaction Date of Dist	n ID : SE-953184 bursement or Obligation
Purpose of Expenditure - Media Buy		Category/ Type 004	10	21 2016
Name of Federal Condidate		i Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	President	Senate State:
Calendar Year-To-Date Per Election for Office Sought	, , ,	4369947.93	Disbursement For: 2016 Other (
Full Name of Payee	<u> </u>		· · · · · · · · · · · · · · · · · · ·	olic Distribution/Dissemination
Buying Time, LLC Date of Dissemination:	10/25/16			25 2016
Mailing Address 650 Massachusetts Avenue, NW Suite 210	, , , , , , , , , , , , , , , , , , ,		Amount	
City	State	Zin Code		62488.00
Washington	DC	20001		; ID : SE-953185 bursament or Obligation
Purpose of Expenditure Media Buy	•	Category/ Type 004	10	21 / 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	President	Senato State:
Calendar Year-To-Date Per Election for Office Sought	. 1	4369947.93	Disbursement For: 2016 Other (
(a) SUBTOTAL of Itemized Independent Expenditure (b) SUBTOTAL of Unitemized Independent Expenditures	lures		· •	126814.00
Under penalty of perjury ! certify that the Independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ite or authoriza	es reported herein were ed committec or agent o	not made in cooper of either, or (if the re	alion, consultation, or concert porting antity is not a political
Kelh C. Ward	•	. Cate	10 25	2016
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24/48 HOUR REPORT OF INDEPENDEN (Schedule E)	IT EXPEN	DITURES		PAGE 8	. OF 8
NAME OF COMMITTEE (In Full)				·	FORM 24/48
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Full Name of Payee Screen Strategies Media, LLC				Public Distribution	
Date of Dissemination:	10/31/16		10	31	2016
Mailing Address 11150 Fairfax Blvd			Amount	•	
Suite 505					
City	State	Zip Code	1	, ,	55000,00
Fairfax	VA 	22030	Transact Oate of C	ion ID : SE-95329 Dishursement or C	13 Obligation
Purpose of Expenditure Media Buy .		Category/ Type 004	10	25	2016
Name of Federal Candidate		Support	Office Sought:	House	District: 00
Donald J. Trump		X Oppose	President	Senate	Siste:
			{	or: Primary	
Calendar Year-To-Date Per Election for Office Sought		4979620.65	2016		
	3 1	 		(specify) >	
Full Name of Payee . AL Media LLC			i i	Public Distribution	
Date of Dissemination:	10/31/16		" 10	31	2016
Mailing Address 222 W Ontario St					
Suite 600			Amount		
City	State	Zip Code			115875.00
Chicago	IL	60654		on ID : SE-95417: Disbursement or (
Purpose of Expenditure Media Buy		Category/ Type 004	10	27	2016
Name of Federal Candidate	······································	Support	Office Sought:	House	District: 00
Donald J. Trump		X. Oppose		Sonate	State:
Calendar Year-To-Dato			Disbursement Fr	or: Primary	General
Per Election for Office Sought	,	4979620.65	Otne	r (specify)	
(a) SUBTOTAL of Itomizod Independent Expanditur	es		·· >	, ,	170875.00
(b) SUBTOTAL of Uniternized Independent Expend	itures		·· •		•
(c) TOTAL Indopendent Expanditures	***************************************	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	·· •	•	433711.75
Under penelty of perjury I certify that the independ with, or at the request of suggestion of, any candid- party committee) any political party committee or its	ate or authoriz	es reported herein were ed committee or agent o	not made in coop of either, or (if the	peration, consulta reporting entity is	tion, or concert s not a political
Kally C. Ward			~ 4 G	•	•
Signature	•	Oate	10.	31 201	6

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24/48 HOUR REPORT OF INDEP	ENDENT EXPEND	ITURES	F
(Schedule E)			PAGE 10 OF 11 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			FEC IDENTIFICATION NUMBER ▼
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			C. C00000935
Check if X 24-hour report 48-hour	report 🔭 🗷 New rep	port Amends repo	ort filed on
Full Name of Payee			Date of Public Distribution/Dissemination
Screen Strategies Media, L	LC emination: 11/04/16		11 04 2016
Malling Address 11150 Fairfax Blvd			المستقدما لمقما المسا
Suite 505			Amount
City	State	Zip Code	40000.00
Fairfax	· VA	22030	Transaction ID : SE-954176 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10 27 2016
Name of Federal Candidate	····	Support	Office Sought: House District: 00
Trump, Donald, J., ,			President Senate State:
Calendar Year-To-Date	harionthydaufaufaufauta.		Disbursement For: Primary X General
Per Election for Office Sought	andreik, illiantersheelle	6419383.70	2016 Other (specify) ▶
Full Name of Payee AL Media LLC Date of Disse	: emination: 11/04/16	<u> </u>	Date of Public Distribution/Dissemination
Mailing Address 222 W Ontarlo St			السنستسنديا استنسا استنسا
Suite 600			Amount
City	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., ,		K Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbursomont For: Primary General Other (specify) ☐
			[] Onial (appear)) -
(a) SUBTOTAL of Itemized Independent	Expenditures		43750.00
	•		Tomorium district and the state of the state
(b) SUBTOTAL of Unitemized Independe	nt Expenditures	***************************************	
·			force have been been been been been been been be
(c) TOTAL independent Expenditures			· ·
Under penalty of perjury I certify that the with, or at the request or suggestion of, a party committee) any political party comm	any candidate or authorized	reported herein were is committee or agent o	not made in cooperation, consultation, or concert of either, or (if the reporting entity is not a political
Ward, Kelly, C., .	l'Electros	nically Filed] Date	11 04 2016
Signature	, joiction	Date	harian hadral harianeral

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	/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	2005
(Sc	chedule E)	PAGE 9 OF 11 FOR SE OF FORM 24/48
	ME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER V
U	OCCC .	C C00000935
Ch	eck if K 24-hour report 48-hour report New report Amends report	filed on
	Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/04/16	Date of Public Distribution/Dissemination
į	Mailing Address 11150 Fairfax Blvd	11 04 2016
ı	Sulte 505	Amount
1	City , State Zip Code	13000.00
Ì	Fairfax VA 22030	Transaction ID : SE-954882 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy Category/ Type 004	11 03 2016
Ĭ	Name of Federal Candidate Support	Office Sought: House District: 00
١	Trump, Donald, J., ,	🗶 President 📗 Senate State:
		Disbursement For:
I	Full Name of Payee	Date of Public Distribution/Dissemination
Ì	The New Media Firm, Inc. Date of Dissemination: 11/04/16	11 04 2016
	Mailing Address 1730 Rhode Island Ave., NW	Instant hard hardend
	Suite 213	Amount
I	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 Od4	11 03 2018
ı	Name of Fodoral Candidate Support	Office Sought: House District: 00
1	Trump, Donald, J., ,	President
	Calcitual real-10-Date	Disbursement For: Primary General Other (specify) Other (specify)
 		Cities (abecily) -
,	(a) SUBTOTAL of Itemized Independent Expenditures	59000.00
,	(b) SUBTOTAL of Uniternized Independent Expenditures	
	(c) TOTAL Independent Expenditures	
١,	Under penalty of perjury I certify that the independent expenditures reported herein were now 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.	ot made in cooperation, consultation, or concert either, or (if the reporting entity is not a political
	Ward, Kelly, C.,	ווייים אין
j	Signature	Instituted frankright !

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SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

TEMIZED INDEPENDENT EXPENDITURES	ı					024 OF 109107 .
NAME OF COMMITTEE (In Full)	`			J. 550 W		24 OF FORM 3X
DCCC				1		ion number 🔻 -
				C	C0000093	5 .
Check if 24-hour report	New rep	ort Amends repo	bslit h	on	,	
Full Name of Payer		, Memo	Kem	Date of Publi	c Distribution	/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 11/07/16 - 24 hours prior to	election day			11	07.	2016
Mailing Address 11150 Fairtax Blvd				,.	٠, .	2015
Suile 505			1	Amount		
City	State	Zip Code			.,	38173.50
· Fairfax	VA .	22030	İ	Transaction Date of Disbu		
Purpose of Expenditure Media Buy		Category/ Type (104		11	01	2516
Name of Federal Candidate:		Support	Office	Sought:	House	District:
Trump, Donald, J., ,		x Oppose	1	President	Senale	State:
Calendar Year-To-Date			Disbu	rsement For:	: Primar	y × General
Per Election for Office Sought		6693272.69	2016	Other (se	pecify) >	
Full Name of Payee		· Memo	Itern			VDIssemination
The New Media Firm, Inc.			j	11 A	, ÷ .	2016
Mailing Address 1730 Rhode Island Ave., NW				31	01	2016
Suite 213				Amount		
City	State	Zip Code		_		3558.00
Washington	DC	20038		Transaction Date of Olsbi		
Purpose of Expenditure		Category/		11:	01	. "
Media Production		Type 004		11	01	2016
Name of Federal Candidate:	······································	Support	Office	Sought:	House	District:
Trump, Donald, J.,		x Oppose	, ×	President	Schale	State:
Calendar Year-To-Date		2502222 50		rsement For: .	: Primar	y K General
Per Election for Office Sought		6693372.69	2016	Other (st	pecify) 🕨	
(a) SUBTOTAL of Itemized Independent Expenditures		'9582-9689-9689-969-969-96-96-96	.	•		41739.50
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(a) SUBTOTAL of Uniternized Independent Experiditu	'05		•	-	•	
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(a) TOTAL Independent Expenditures		wrden.hat P41PhA++++++++++++++	•	•	•	
						
Under penalty of perjury I certify that the independent with, or at the request or suggestion of, any candid party committee or its	ate or authorized	reported herein were committee or agent of	noi m; eithe	ide in cocpera r, or (il the rep	don, consult orting entity	ation, or concert is not a political
Ward Kelly, C.,	Electronically Fit	l.u.li	•			
Signature	tercamitade ta	Date	; 13	2 08	50	16

	8 HOUR REPORT OF INDEPËNDE edule E)	NT EXPEN	IDITURES		PAGE 51 OF 52
·	•		······································		FOR SE OF FORM 24/48
NAME	E OF COMMITTEE (In Full)			FEC II	DENTIFICATION NUMBER T
				C	C00000935
Chec	k if 24-hour report	∑. New	report Amends reno	ort filed an	* n , * * , *
F	ull Name of Payer		 	Date of Publi	ic Distribution/Dissemination
l	Screen Strategies Media, LLC Date of Dissemination	: 10/18/16		10"	18 2016
"	halling Address 11150 Fairfax Blvd	•	-	Amount	:
	Suite 505				
	iliy .	State	Zip Code	-	134898.50
۶	Fairlex	VA	22030		ID.: SE-952377 ursament or Obligation
	urpose of Expenditure Media Buy		Category/ Type 004	10	11 2016
N	lame of Federal Candidate .		; Support	Office Sought:	House District: 00
	Donald J. Trump		Coppose	_	A'.=
				1	Senale State:
L	Calendar Yoar-To-Date Per Election for Office Sought	. 1	,2613000.20	Disbursement For: -2016Other (sp	· • • • • • • • • • • • • • • • • • • •
	ull Name of Payee			Date of Publi	ic Distribution/Dissemination
- '	Kully Hall, LLC Oate of Dissemination	10/18/16		j "10"	18 2016
l ii	Mailing Address 1932 1st Ave, Suite 203				10 2010
- 1	TOOK 100 FITTY WATER MANY			Атоипі	
c	City	State	Zip Code	 	6225.00
	Soattle	WA	98101		D : SE-952379 ursement or Obligation
	Purpose of Expenditure Media Buy Media Production		Category/ Type	, 10 _{,7}	18 2016
N	lame of Federal Candidate		Support	Office Sought:	House District: 00
0	Donald J. Trump		X. Oppose	X Presideni	Senate State:
-	Calendar Year-To-Date Per Election for Office Sought		2613000.20		Primary X General
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ري ا	SUSTOTAL of Homited Independent Expenditu	uras		▶.	141123.50
(6)	SUBTOTAL of itemized independent Expendit	AUG	_	. •	F.7 1 - marriany
l _{(ы}	SUBTOTAL of Unitemized Independent Expen-	editures	•	•	
\ `-'	and the distribution of the second control o	0110.00			•
(c)	TOTAL Independent Expenditures			•	_
				'	
witi	dor ponally of perjury I certify that the indepen h, or at the request or suggestion of, any candi rry committee) any political party committee or it	idate or authoriz	res reported herein were zed committee or agent o	not made in cooperat	tion, consultation, or concert orling entity is not a political
	Kelly C. Ward		Date	10 19	2016
	Signature				

24/48 HOUR REPORT OF INDE	PENDENT EXPEND	ITURES	
(Schedule E)			PAGE 3 OF 3 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			FEC IDENTIFICATION NUMBER V
DCCC			C C00000935
Check II 24-hour report X 48-hour	report : 🗶 New repo	ort Amends repo	rt filed on
Full Name of Payee Buying Time, LLC	•		Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Ave	emination: 10/11/16		10 11 2016
Suite 210	auro, Maa		Amount
City	State	Zíp Code	57500.00
Washington	DC	20001	Transaction ID : SE-951439 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Catogory/ Type 004	10 11 2016
Name of Federal Candidate	···	Support	Office Sought: House District: 00
Trump, Oonald, J., ,		Oppose	X President Senate State:
Calendar Yoar To-Dato Per Election for Office Sought	A of Alfred and the	1459931,62	Oisbursament For: [Primary x Genoral 2016 Other (specify) ▶
Full Name of Payee Screen Strategies Media, LL(Date of Diss	C semination: 10/12/16		Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd			Aniount
Suite 505			Section 11
City	State	Zip Code	74632.00
Fairfax		22030	Transaction ID : SE-951438 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004	10 11 2016
Name of Federal Candidate		Support	Office Sought: House District: 00
Trump, Donald, J., .		Oppose	President Senato State:
Calendar Year-To-Date Per Election for Office Sought	The state of the s	1534583.62	Disbursoment For: Primary X General 2016
(a) SUBTOTAL of Itemized Independent	Expenditures	***************************************	ي تومد بر المجاز و
(b) SUBTOTAL of Unitemized Independe	ent Expenditures	***************************************	b and the many sample of the
(c) TOTAL Independent Expenditures	•		170032.00
	any cundidate or authorized		not made in cooperation, consultation, or concert's either, or (if the reporting entity is not a political
Ward. Kelly. C		<u>-</u>	The Book of the Control
Signature	/Electroni	cally Filed Date	10 13 , 2016

	/48 HOUR REPORT OF INDEPEND	ENT EXPEND	ITURES		ſ	PAGE 17 OF 1	, —
(Sc	chedule E)				}	FOR SE OF FORM 24/48	
	AME OF COMMITTEE (In Full)				FEC ID	ENTIFICATION NUMBER	ì V
C	OCCC				1 .	00000935	
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	Full Name of Payos				Date of Public	Distribution/Dissemination	n
	Screen Strategies Media, LLC Date of Disseminate	on: 10/20/16			10	20 2016	1
	Mailing Address 11150 Fairfax Blvd Suite 505				Amount	y w 4pd	•
	City	State	Zip Code			107040.0	ור" ה
	Fairfax	VA	22030		l Transaction II Date of Disbur	de malera el transferancia de la	
	Purpose of Exponditure Media Buy		Category/ Type 004		10 10	18 2016	-
•	Name of Federal Candidate		Support	Office 5	Sought:	House District: 00	
	Donald J. Trump		i∑ Oppose	ĺXI F	President	Senate State:	
	Calendar Year-To-Onte Per Election for Office Sought	. ,25	989611.20	Disburs 2016	oment For: Other (spe	Primary iX Gene	eral
	Full Name of Payed AL Media LLC Date of Dissemination	nn: 10/20/16			Date of Public	Distribution/Dissemination	n , •
	Mailing Address 222 W Onterio St	At. 10.20.10				20 2016	٠.
	Suite 600			1	Amount		_
	City	State	Zip Code		• .	140250.00	
	Chicago	IL .	60654		ransaction ID Data of Disbu	: SE-952071 rsement or Obligation	
	Purpose of Expenditure Media Buy		Category/ Type 004		, 10"	17 2016	ا ^۲ ۰
	Name of Federal Candidate		Support	Office	Sought:	House District:0	0
	Donald J. Trump		i∑i Oppose	X	President	Senate State:	
	Calendar Year-To-Date Per Election for Office Sought	الست ما	2989611.20	Disburs 2016	sement For:	Primary Sens	eral
لسر	<u> </u>	, , , , , , , , , , , , , , , , , , , 		نببب			=
	(a) SUSTOTAL of Itemized Independent Expend	itures		·· >	r	247290.00	
	(b) SUBTOTAL of Uniternized Independent Expe	enditures		·· >		y .	
	(c) TOTAL Independent Expenditures			" •		652070.38	. •
,	Under penalty of perjury I certify that the indeposition, or at the request or suggestion of, any can party committee) any political party committee or	didate or authorized	reported herein were committee or agent of	not mad of either,	e in cooperation or (if the ropor	on, consultation, or concerting entity is not a politic	ert (er
	Kelly C. Wurd		_ Date	, ²¹ 10	21	2016	į
	Signature					· •	

24/48 HOUR REPORT OF INDEPENDENT EXPENDIT(Schedule E)	JRES	PAGE 15 OF 15
,		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER ▼
DCCC		C c00000935
Check it 24-hour report 48-hour report New report	Amends report	filed on
Full Name of Payee		Date of Public Distribution/Dissemination
Prism Communications, Inc. Date of Dissemination: 10/27/16		10 27 2016
Malling Address 1000 Potomac Street, NW		A
Suite 420		Amount
City State Zip	Code	3291.58
	0007	Transaction ID : SE-953927 Date of Disbursement or Obligation
Purpose of Expenditure Media Production	Category/ 004	10 26 2016
Name of Federal Candidate	Support C	Office Sought: House District: 00
Donald J. Trump .	Oppose	President Senato State:
Calendar Year-To-Date		isbursement For: Primary !X! General
Per Election for Office Sought 4550	355.45	Other (specify)
Full Name of Payee		Date of Public Distribution/Dissemination
76 Words Corp. Date of Dissemination: 10/26/16		1
Mailing Address 1121 5th St, NW		10 26 2016
Floor#1		Amount
	p Code	5500.00
· • • • • • • • • • • • • • • • • • • •	0001	Transaction ID : SE-954171 Date of Disbursement or Obligation
Purpose of Expenditure Medis Production	Category/ 004 Type 7	10 27 2016
Name of Federal Candidate	Support C	Office Sought: House District: 00
Donald J. Trump	∑ Oppose	President Senate State:
Calendar Year-To-Date		Disbursement For: Primary XI General
Per Election for Office Sought		Other (spacify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures		8791.58
(b) SUBTOTAL of Unitermized Independent Expenditures		-ran
(c) TOTAL Indopendent Expenditures		771178.77
Under penalty of perjury I certify that the independent expenditures re- with, or at the request or suggestion of, any candidate or authorized co- party committee) any political party committee or its agent.	ported herein were no numitiee or agent of e	t made in cooperation, consultation, or concert ther, or (If the reporting entity is not a political
Kelly C. Ward	Date	ייט א א א א א א א א א א א א א א א א א א
Signature		

(Schedule E)	PENDITURES	PAGE 22 OF 25 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 Amands report	tiged ou
Full: Name of Payee Kully Hall, LLC Date of Dissemination: 10/12/16 Mailing Address 1932 1st Ave, Suite 203		Date of Public Distribution/Dissemination
City State Seattle WA	Zip Code 98101	4297.00 } Transaction ID : SE-951665 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production	Category/ Typo	10 14 2016
Neme of Federal Candidato Danald J. Trump	X Орµоsе	Office Sought: House District: 00 President Senate State:
Calendar Year-To-Date Por Election for Office Sought		Disbursement For: ☐ Primary ☐ General 2016 ☐ Other (specify) ▶
Full Namo of Payee The New Media Firm, Inc. Date of Dissemination: 10/12/16		Date of Public Distribution/Dissemination
Mailing Address 1730 Rhode Island Avo., NW Suite 213		Amount
City State Washington DC	Zip Code 20036	56930.43 Transaction ID : SE-951666 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	Category/ GO4	10 12 2016
Name of Federal Candidate Donald J. Trump	Support Oppose	Office Sought: House District: 00 President Senato State:
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: ☐ Primary ☐ General 2016 ☐ Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures		51227.43
(b) SUBTOTAL of Uniternized Independent Expenditures		
(c) TOTAL Independent Expenditures		>
Under penalty of perjury I certify that the independent expervith, or at the request or suggestion of, any candidate or au party committee) any political party committee or its agent.		
Kelly C. Ward Signature	Oate	10 14 2016 ¹

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(Schedule E)	ENI EXPLIN	DITORES		PAGE 21 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER ▼
DCCC				C c00000935
			····	
Check if 24-hour report	₩ New re	pport Amends repo	ort filed	on Million D. / V. V. V. V.
Full Name of Payee		•	1	Date of Public Distribution/Dissemination
The New Media Firm, Inc. Date of Disseminate	on: 10/12/16			10 12 2016
Mailing Address 1730 Rhode Island Ave., NW				Amount
Suite 213	State	Zio Codo		ا همه ده ومسر بستر خصصتهای بریما بو به اسرهای ADAZINE
City Washington	State DC	Zip Code 20036		4047.25 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	Office	Sought: House District: 00
Trump, Donald, J., ,		X Oppose	X	President Senate State:
Calendar Year-To-Date Per Election for Office Sought	ing ang mg mg m g mg . Ing ang ang ang ang ang ang ang ang ang a	1721688.30	Disbur 2016	sement For: Primary Seneral Other (specify) ▶
Full Name of Payee				Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Disseminat	ion: 10/12/16			יין פין די אל אין פין די אל אין פין די אל אין פין די אל אין אין פין די אל אין אין פין די אל אין אין פין די אל
Mailing Address 11150 Fairfax Blvd	10/12/10	<u>-</u>		10 12 1 2016
Suite 505				Amount
City	State	Zip Code	$\neg \uparrow$	121850.00
Fairfax	VA	22030		Transaction ID : SE-951660 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 1 004		10 12 2016
Name of Federal Candidate		Support	Office	Sought: House District: 00
Trump, Donald, J., ,			X	President Senate State:
Calendar Year-To-Date Per Election for Office Sought	المستوات و المانية المستوات و الأوامانية	1721688.30	Disbui 2016	sement For: Primary General Other (specify) ▶
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(a) SUBTOTAL of Itemized Independent Expen	ditures		. ▶	125897.25
(b) SUBTOTAL of Unitemized Independent Exp	enditures		. •	per properties and a service a
(c) TOTAL Independent Expenditures		***************************************	· •	Leanna maria
Under penalty of perjury I certify that the indep with, or at the request or suggestion of, any car party committee any political party committee or	ndidate or authorize			
Ward, Kelly, C., ,	f Floren	onically Filed) Nate		의 / D D" 1 선 작 'Y 'Y '
Signature	/Electric	Date Date	. 10	2016
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(Schedule E)	NI EXPEND	ITUNES		PAGE 21 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (in Full)			FEC ID	DENTIFICATION NUMBER ▼
DCCC			1:	C00000935
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Full Name of Payee			Date of Public	Distribution/Dissemination
The New Media Firm, Inc. Date of Dissemination:	10/12/16			12 2016
Mailing Address 1730 Rhode Island Ave., NW			Amount	المستسلم المستمسل
Suite 213			Amount) إرسياريشهريت إن برينيميس عبار دخ
City	State	Zip Code	1	4047.25
Washington .	DC	20036		D : SE-952372 Irsement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ v Type	10	14 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	egeneralis. Også sterner	1856586.80	Disbursement For: 2016 Other (sp	Primary General ecify) ■
Full Name of Payce			Date of Public	c Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination:	10/12/16		10 M	12 2016
Mailing Address 11150 Fairfex Blvd				
Suite 505			Amount	ایستومتدر محرب رسیم معر د وید.
City	State	Zip Code		121850.00
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Purpose of Expenditure Media Buy		Category/ 004	10	14 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	. 1 1	1856586.80	Disbursement For: 2016 Other (sp	Primary ✗ General pecity) ▶
(a) SUBTOTAL of Itemized Independent Expenditu	ıres		. •	125897.25
(b) SUBTOTAL of Unitemized Independent Expendent	ditures		p== ==;-=q= • ► • • • • • • • • • • • • • • • • • •	
(c) TOTAL Independent Evenditures			\$ • >	-:
(c) TOTAL Independent Expenditures			*	أد مهوسه د دسه د
Under penalty of perjury I certify that the independent with, or at the request or suggestion of, any candic party committee) any political party committee or it	date or authorized			
Ward, Kelly, C., .	[Electron	ically Filed) Date	W "W" / p 7"0" 10 18	2016
Signature	1	_ Date		1
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	HOUR REPORT OF INDEPER	NDENT EXPEND	ITURES	•	PAGE 3 OF 3
<u>. </u>				~	FOR SE OF FORM 24/48
DCC	OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER ▼
					C c00000935
Check	If 24-hour report 3 48-hour rep	new rep	ort Amends repo	ort filed on	white to the state of the measure of
	Name of Payee uying Time, LLC			Date	of Public Distribution/Dissemination
Ma	Date of Olssemir illing Address 650 Massachusetts Avenue			 ἰ	10 11 2016
""	Suite 210	, NV		Amoi	ınt
Ch		State	Zip Code		57500 00
w	ashington	DC	20001		saction ID: SE-951439 of Disbursement or Obligation
	rpose of Expenditure edia Buy		Category/ 004	- į - !'	10 11 2016
Na	me of Federal Candidate		Support	Office Sough	nt: House District: 00
Oc	enald J. Trump		(X) Oppose	Presid	ent Senate State:
	Calendar Year-To-Date Per Election for Office Sought	14	159931.62	Disbursorner	1.20 - 1.3
		4 -47 -4 4- 10.		<u> </u>	Other (specify)
	l Name of Payee creen Strategies Media, LLC Duto of Dissemb	nation: 10/12/16		J .	of Public Distribution/Dissemination
Ма	iling Address 11150 Fairfax Blvd			Amo	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
<u> </u>	Suite 505			, 3·	پسته در پاستو ده ده ود.
Cit	y nirlax	State VA	Zip Code 22030		74632.00 74632.00 74632.00 74632.00 74632.00 74632.00 74632.00 74632.00 74632.00 74632.00 74632.00 74632.00 74632.00
	rpose of Expenditure odia Buy		Category/ 004		10 11 2016
Na	me of Federal Candidate		Support	Office Soug	ht: House District: 00
Do	nald J. Trump		Oppose	Presid	ent Senate State:
	Calendar Year-To-Date . Per Election for Office Sought		1534563.62	Disbursemen 2016	nt For: Primary ⊠ Ganeral Other (specily) ▶
					
(a) \$	SUBTOTAL of Itemized Independent Exp	enditures		• •	132132.00
(b) s	SUBTOTAL of Uniternized Independent E	xpenditures		· - : (
(c) 1	FOTAL Independent Expenditures			• [170032.00
with,	er ponalty of perjury I certify that the Ind or at the request or suggestion of, any committee) any political party committee	candidate or authorized	reported herein were committee or agont o	not made in of either, or (if	cooperation, consultation, or concert the reporting entity is not a political
	Kally C. Ward		Date	10	13 2016
s	ignature		Sale	,,	

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
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Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/25/16	Date of Public Distribution/Dissemination
Malling Address 11150 Fairfax Blvd	10 25 2016 Amount
Sulte 505	A the contract the tributer describing and the contract the contract to the contract the contract to the contr
City State Zip Code	121850.00
	Transaction ID : SE-952388 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type Out Out Out Out Out Out Out Out Out Ou	10 18 2016
Name of Federal Candidate Support Office s	Sought: House District: 00
Donald J. Trump Oppose	President Sonate State:
Per Election for Office Sought 4368947.93 2016 r	ement For: Primary General
	Other (specify) ▶
Full Name of Payee Buying Time, LLC Date of Dissemination: 10/25/16	Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Avenue, NW	1111 Ph. 18 Seculoscial Seculoscolocustrantis
Suite 210	Amount
City State Zip Code	19691.00
Washington DC 20001 T	ransaction ID : SE-953229 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type Type	10 24 7 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump Oppose Oppose	President [] Senate State:
Calendar Year To Date For Election for Office Sought Disburs 2018	sement For: Primary General
	Other (specify) >
(a) SUBTOTAL of Itemized Independent Exponditures	141541.00
(b) SUBTOTAL of Uniternized Independent Expenditures	ا پردا موسد توجعین این دختیات اینده از این از این از این از از این از این از از این از از این از از از از از ا محمد قاربینگامد قدر دخار گرفتی و از از این از
(c) TOTAL Independent Expenditures	g my rain yan yann yang mga aga ag an an an traga managanan an an an
Under penalty of perjury I certify that the independent expenditures reported horoin were not madwith, 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.	e in cooperation, consultation, or concert or (if the reporting entity is not a political
Kelly C. Ward Date 10	25 2016
dignature	

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 57 OF 57
NAME OF COMMITTEE (In Full) DCCC	FOR SE OF FORM 24/48 FEC IDENTIFICATION NUMBER ▼ C C00000935
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Full Name of Payed Buying Time, LLC Date of Dissemination: 11/01/16 Mailing Address 650 Massachusetts Avenue, NW	Date of Public Distribution/Dissemination 11 01 2016 Amount
Suite 210	In the contract of the contrac
City State Zip Code Washington . DC 20001	17175.00 Transaction ID: SE-954373 Date of Disbursement or Obligation
Purpose of Expanditure Media Buy Gatogory Type O04	10 28 2016
	ce Sought: House District: 00 President Senate State:
Calendar Year To-Date Por Election for Office Sought District September 1	oursement For: Primary General
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/01/16 Mailing Address 11150 Foirfax Blvd	Date of Public Distribution/Dissemination
Suite 505	Amount
City State Zip Code Fairfax VA 22030	74850.00 Transaction ID : SE-954175 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type O04	10 27 2016
Day 11.1 T	ce Sought: House District: 00 President Senate State:
	oursement For: Primary X! Goneral
(a) SUBTOTAL of Itemized Independent Expenditures	92025.00
(b) SUBTOTAL of Uniterrized Independent Expenditures	
(c) TOTAL Independent Expenditures	14333615.05
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.	
Kelly C. Ward	11 02 2016
Signature	11 1 05 3 1 5010

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(Schedule E)	NUENI EXPENDI	IURES			PAGE 11 FOR SE OF	OF 12 FORM 24/48
NAME OF COMMITTEE (In Full) DCCC				FEC	C00000935	ON NUMBER ▼
Check il 24-hour report 48-hour rep	port X New repo	ort Amends repo	ort filed on	[uTh]	· [0 1 6] ·	PAYTY TY
Full Name of Payee Screen Strategies Media, LLC	C Ination: 11/05/16		Da	ite of Publ		/Dissemination
Malling Address 11150 Fairfax Blvd Suite 505	maudii. 11705/10		An	nount	05	2016
City Fairfax	State VA	Zip Code 22030			ID : SE-9544	
Purpose of Expenditure Media Buy	•	Category/ Type 004		ite of Disb	oursement or 6	Obligation 2016
Name of Federal Candidate Trump, Donald, J., ,		Support Doppose	Office So	•	House Senate	District:
Calendar Year-To-Date Per Election for Office Sought		6526208,19	Disburser 2016	7	Primar	y 🕱 General
Full Name of Payeo Canal Partners Media, LLC Date of Dissem Mailing Address 25 Whitlock Place	lination: 11/06/16			11	lic Distribution	/Dissemination 2016
Suite 200	Stale	Zip Code	A	nount		7910.00
Marietta	GA	30064			ID : SE-95488 oursoment or	-1-1-4*1 1
Purpose of Expenditure Media Buy		Calegory/ Type 004		11	03	2016 Y
Name of Fedoral Candidato Trump, Donald, J., .	•	Support Oppose	Office So	-	House Senate	District:00
Calendar Year-To-Date Per Election for Office Sought		6648199.19	Disburse 2016	ment For:	Primar	y 🗶 General
(a) SUBTOTAL of Itemized Independent Ex	penditures		> [hatanbal ⁷ is	66610.00
(b) SUBTOTAL of Unitermized Independent	Expenditures					
(c) TOTAL Independent Expenditures					<u> </u>	
Under penalty of perjury I certify that the in with, or at the request or suggestion of, any party committee) any political party committee.	y candidate or authorized	reported herein were committee or agent	not made of either, or	in coopera	ation, consults porting entity	ation, or concert is not a political
Ward, Kelly, C	[Electron	iically Filed Date	е [м т м	06	20	16
Signature			-		-1	Acceptant 1

Image# 201610189033039653 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES					
(Schedule E)		PAGE 19 OF 25 FOR SE OF FORM 24/48			
NAME OF COMMITTEE (In Full)					
DCCC		C C00000935			
Check if 24-hour report 🔀 48-hour report	New report 🗶 Amends repo	ort filed on 10 14 2016			
Full Name of Payee Ralston Lapp Media, LLC Date of Dissemination: 10/14/16	•	Date of Public Distribution/Dissemination			
Mailing Address 1054 31st Street, NW		10 14 2016 Amount			
Suite 430	7-0-4-	10000 TA			
City State Washington DC	Zip Code 20007	12260.71 Transaction ID : SE-951677 Date of Disbursement or Obligation			
Purpose of Expenditure Media Production	Category/ Type 004	10 14 2018			
Name of Federal Candidate	Support	Office Sought: X House District: 23			
Hurd, William, , ,	M Oppose	President Senate State: TX			
Calendar Year-To-Date Per Election for Office Sought	1648833.65	Oisbursement For: Primary General Other (specify) ▶			
Full Name of Payee		Date of Public Distribution/Dissemination			
Buying Time, LLC Date of Dissemination: 10/14/10	6	10 14 2016			
Mailing Address 650 Massachusetts Avenue, NW Sulte 210		Amount			
City State	Zip Code	53000.00			
Washington DC	20001	Transaction ID : SE-952374 Date of Disbursement or Obligation			
Purpose of Expenditure Media Buy	Category/ Type 004	10 / 13 / 2016			
Name of Federal Candidate Trump, Donald, J.,	Support Oppose	Office Sought: House District: 00 Fresident Senate State:			
Calendar Year-To-Date Per Election for Office Sought	1919459,68	Disbursement For: Primary General Other (specify) ▶			
(a) SUBTOTAL of Itemized Independent Expenditures		65260.71			
(b) SUBTOTAL of Unitemized Independent Expenditures		· >			
(c) TOTAL Independent Expenditures		·· •			
Under penalty of perjury I certify that the independent exp with, or at the request or suggestion of, any candidate or a party committee) any political party committee or its agent.	authorized committee or agent of				
Ward, Kelly, C., .	Electronically Filed Date	10 18 2016			
Signature		استسا استسا استسا			

	ge# 201610199033071490 /48 HOUR REPORT OF INDE	:DENDENT EYDENDI	TURFS				
	thedule E)	.FENDENT EXPENDI	TONES		•	PAGE 52	
	ME OF COMMITTEE (In Full)						F FORM 24/48
	CCC				FEC II	DENTIFICAT	ION NUMBER ▼
						C00000935	
Chi	eck if 24-hour report 48-hou	r report New repo	ort Amends repo	rt filed c	on [ij w		
	Full Name of Payee The New Media Firm, Inc. Pate of Dis	semination; 10/18/16			Dale of Publi	c Distribution	d/Dissemination
	Mailing Address 1730 Rhode Island Av					لسنسا	2010
	Suite 213				Amount		
	City	State	Zip Code				3407.87
	Washington	DC	20036		Transaction Date of Disb		
	Purpose of Expenditure Media Buy Media Production		Category/ Type		10	18	2016
	Name of Federal Candidate		Support	Office	Sought:	House	Olstrict: 00
	Trump, Donald, J., ,		X Oppose	K	President [Senate	State:
	Calendar Year-To-Date Per Election for Office Sought		2613000.20	Disbur 2016	sement Far: Other (s	Primar	y 🗶 General
	Full Name of Payee				Date of Publ	ic Distributio	n/Dissemination
		ssemination: 10/18/16			10	18	2016
	Mailing Address 650 Massachusells Suite 210	s Avenue, NW		ļ.	Amount		
	City	State	Zip Codo				83829.00
	Washington	DC	20001		Transaction I Date of Disb		
	Purpose of Expenditure Media Buy		Calegory/ Type 004]	10	17	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		2613000.20	Disbui 2016	rsement For:	Prima	ry 🕱 General
	(a) SUBTOTAL of Itemized Independen	nt Expenditures		·· •	Y-7		87236.87
	(b) SUBTOTAL of Uniternized Indepen	dent Expenditures	•••••••••••••••••	·· •	17		
	(c) TOTAL Independent Expenditures		***************************************			4-4-3	11152409.38
1							102400.00

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.

•					
Ward, Kelly, C., ,	[Electronically Filed]	Date	10	19	2016
Signature			استاسيا	احساسية	

24/48 HOUR REPORT OF INDEPENDEN (Schedule E)	T EXPEND	HURES		PAGE 52 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		1,2-1,-2-1,		FEC IDENTIFICATION NUMBER V
DCCC			}	C: C00000935
Check if 24-hour report	New rep	port [] Amends repo	ort liled on	n il in all laboration
Full Name of Payer			Date	of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissomination: 1	0/25/16	-	1 -	10 25 2016
Mailing Address 11150 Fairfax Blvd Suite 505			Amou	المن والمدار فاستحصيته والمدار المارد والمار المارد
City	State	Zip Cude		64326.00
Fairtax	VA	22030		saction ID: SE-953184 of Disbursement or Obligation
Purpose of Expenditure Modia Buy		Catogory/ Type : 004	u	10 21 2016
Name of Federal Candidate		Support	Office Sough	ht: House District: 00
Donald J. Trump		Oppose	Preside	tent Senate State:
Calendar Year-To-Date Per Election for Office Sought	, 43	369947.93	2016	nt For:
Full Name of Payee Buying Time, LLC Date of Dissemination: 1	10/25/16		1	of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Avenue, NW Sulte 210			Amou	, ., , m
City	State	Zip Code		62488.00
Washington	DC	20001		action ID: SE-953185 of Diabursoment or Obligation
Purposo of Expanditure Media Buy		Category/ 1 004		10 3 21 2016
Name of Federal Candidate		Support	Office Sough	hi: House District: 00
Donald J. Trump		Oppose	X Preside	dent Senate State:
Calendar Year-Tc-Date Per Election for Office Sought). I	4369947.93	2016	nt For: [Primary X General Other (specify) ▶
(a) SUBTOTAL of itemized independent Expenditure	łs	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	· •	126814.00
(b) SUBTOTAL of Uniternized Independent Expendit	ures		•	magazi ya wa
(c) TOTAL Independent Expenditures			•	وديو و موساعة داد. داديو دياه داد
Under pohalty of porjuly I certify that the independent with, or at the request or suggestion of, any candidate party committee or its a	ile or authorized	réported herein were committee ar agent o	not made in co	cooperation, consultation, or concert the reporting entity is not a political
Kelly C. Ward		Date	· 4 4 / ;	25 7 2016
Signature				The land of the land