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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.<sup>3</sup>

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

<sup>&</sup>lt;sup>1</sup> | | C.F.R. § 106.1(a)(1).

<sup>&</sup>lt;sup>2</sup> 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.

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.<sup>4</sup>

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.<sup>6</sup> 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.<sup>7</sup>

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.

<sup>&</sup>lt;sup>4</sup> 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).

<sup>&</sup>lt;sup>5</sup> See FEC MUR 6916, First General Counsel's Report (Oct. 22, 2015).

<sup>&</sup>lt;sup>6</sup> See, e.g., 11 C.F.R. § 110.2(c)(2)(ii).

<sup>&</sup>lt;sup>7</sup> See, e.g., FEC Advisory Opinion 1985-14 (DCCC).

These Complaints are about advertisements that the DCCC undertook in service of these multiple objectives. Supervised by a senior DCCC employee, DCCC staff worked with House campaigns to develop and produce the advertisements beginning with script development through the advertising buying phase. 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.
- 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.

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,

<sup>12</sup> The advertisement in MUR 7172 can be found here: <a href="https://www.youtube.com/watch?v=nwdljKSaFdQ">https://www.youtube.com/watch?v=nwdljKSaFdQ</a>. The advertisement in MUR 7175 can be found here: <a href="https://www.youtube.com/watch?v=GJCZwJ3tYXw">https://www.youtube.com/watch?v=GJCZwJ3tYXw</a>. 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: <a href="https://www.youtube.com/watch?v=HIxNUxf-t80">https://www.youtube.com/watch?v=HIxNUxf-t80</a>. The advertisement in MUR 7179 can be found here: <a href="https://www.youtube.com/watch?v=OpdllznhrF4">https://www.youtube.com/watch?v=OpdllznhrF4</a>. The advertisement in MUR 7188 can be found here: <a href="https://www.youtube.com/watch?v=epFwW3WyQWo">https://www.youtube.com/watch?v=epFwW3WyQWo</a>. 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.

<sup>&</sup>lt;sup>8</sup> See Exhibit A (affidavit of Michael Ian Russell)..

<sup>&</sup>lt;sup>9</sup> See Exhibit B (relevant pages of FEC reports).

The advertisement in MUR 7169 can be found here: <a href="https://www.youtube.com/watch?v=7mb2DsowG00">https://www.youtube.com/watch?v=7mb2DsowG00</a>. The advertisement in MUR 7171 can be found here: <a href="https://www.youtube.com/watch?v=ukmwN7ivMU">https://www.youtube.com/watch?v=ukmwN7ivMU</a>. The advertisement in MUR 7174 can be found here: <a href="https://www.youtube.com/watch?v=g\_4kBjw8r-U">https://www.youtube.com/watch?v=g\_4kBjw8r-U</a>. The advertisement in MUR 7176 can be found here: <a href="https://www.youtube.com/watch?v=WCx3ObETyrE">https://www.youtube.com/watch?v=WCx3ObETyrE</a>. The advertisement in MUR 7182 can be found here: <a href="https://www.youtube.com/watch?v=il8196BhvWg&feature=youtu.be">https://www.youtube.com/watch?v=il8196BhvWg&feature=youtu.be</a>.

<sup>11</sup> See Exhibit B.

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.<sup>13</sup>

All of the advertisements discussed in the Complaints were conceived and executed by the DCCC independently of HFA or its agents. <sup>14</sup> Because the ads would refer to Trump, the staff and campaigns were instructed not to coordinate them with HFA or its agents. <sup>15</sup> 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. <sup>16</sup> The declarations demonstrate also that there was no coordination through any common vendor, former employee or independent contractor. <sup>17</sup>

### LEGAL ANALYSIS

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

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

<sup>&</sup>lt;sup>13</sup> The advertisement in MUR 7173 can be found here: <a href="https://www.youtube.com/watch?v=RriiljNAe-1">https://www.youtube.com/watch?v=RriiljNAe-1</a>. The advertisement in MUR 7187 can be found here: <a href="https://www.youtube.com/watch?v=8DNQEgLEECA">https://www.youtube.com/watch?v=8DNQEgLEECA</a>. See Exhibit B.

<sup>14</sup> See Exhibit A.

<sup>&</sup>lt;sup>13</sup> Id.

<sup>16</sup> Id.; see also Exhibit C (affidavit of media vendors).

<sup>&</sup>lt;sup>17</sup> 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.
<sup>18</sup> 11 C.F.R. § 106.1(a).

<sup>&</sup>quot; Id.

<sup>&</sup>lt;sup>20</sup> 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)).

<sup>21</sup> 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.<sup>22</sup>

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

<sup>&</sup>lt;sup>22</sup> 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.

<sup>23</sup> FEC Adv. Op. 2004-01 (Bush/Kerr).

<sup>&</sup>lt;sup>24</sup> 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.

<sup>&</sup>lt;sup>25</sup> FEC Adv. Op. 2010-10 (NRL PAC).

<sup>&</sup>lt;sup>26</sup> FEC Adv. Op. 2004-29 (Akin) at 6.

<sup>&</sup>lt;sup>27</sup> 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."<sup>28</sup>

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. <sup>29</sup> These ads that— in each case—referred to two candidates in two different elections, sometimes expressly advocating Trump's defeat and sometimes opposing his policy positions, were allocated in accordance with these longstanding Commission interpretations.

## B. Respondents attributed the advertisements correctly.

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

<sup>&</sup>lt;sup>29</sup> 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).

<sup>30</sup> 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.<sup>33</sup> The Commission has repeatedly held that when a federal campaign pays for the portion of an advertisement

33 See Exhibit B.

<sup>31</sup> Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016), https://www.youtube.com/watch?v=g\_4kBjw8r-U.

<sup>&</sup>lt;sup>32</sup> 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.<sup>34</sup>

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.<sup>35</sup>

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.<sup>36</sup>

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

<sup>&</sup>lt;sup>34</sup> 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).

<sup>35</sup> See Exhibit B.

<sup>&</sup>lt;sup>36</sup> 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.<sup>37</sup> 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.<sup>38</sup> In these latter cases, the DCCC reported the portions of the ads attributable to Trump as independent expenditures opposing him.<sup>39</sup>

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.<sup>40</sup>

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

("Mike Gallagher says we still have to support Donald Trump. No, we don't; we don't have to support Mike Gallagher either"), <a href="https://www.youtube.com/watch?v=LS-gU95vm9U">https://www.youtube.com/watch?v=LS-gU95vm9U</a>; Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016) at :28 ("Vote No on Donald Trump and David Young"),

https://www.youtube.com/watch?v=g\_4kBjw8r-U; Suzanna Shkreli for Congress, Brags, YouTube (Oct. 14, 2016) at :22 ("Vote No on Donald Trump and Mike Bishop"), https://www.youtube.com/watch?v=WCx3ObETyrE; Bryan Caforio for Congress, Stand Up, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), https://www.youtube.com/watch?v=it&196RbyWy&feature=youtube.

<sup>&</sup>lt;sup>37</sup> 11 C.F.R. § 100.16.

<sup>&</sup>lt;sup>38</sup> Dangerous for PA Women, YouTube (Oct. 20, 2016) at :20 ("Say No To Donald Trump & Brian Fitzpatrick"), <a href="https://www.youtube.com/watch?v=7mb2DsowG00">https://www.youtube.com/watch?v=7mb2DsowG00</a>; Ruben Kihuen for Congress, Our Values, YouTube (Oct. 18, 2016) at :23 ("Vote NO on Cresent Hardy and Donald Trump"), <a href="https://www.youtube.com/watch?v=ulkmwN7ivMU">https://www.youtube.com/watch?v=ulkmwN7ivMU</a>; 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

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

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

<sup>&</sup>lt;sup>40</sup> See, e.g., FEC Adv. Op. 1985-14 (DCCC).

<sup>41 11</sup> C.F.R. § 100.22.

action."<sup>42</sup> 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.<sup>43</sup>

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

<sup>&</sup>lt;sup>42</sup> Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 4, Matter Under Review 6113 (Dec. 18, 2009).

<sup>&</sup>lt;sup>43</sup> FEC v. Furgaich, 807 F.2d 857, 864 (9th Cir. 1987).

<sup>44</sup> 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.

<sup>45</sup> Wrong Choice for TX Families, YouTube (Oct. 4, 2015), https://www.youtube.com/watch?v=GJCZwJ3tYXw.

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.<sup>47</sup>

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

The Commission also must consider whether Respondents have provided "sufficiently compelling evidence" to refute the Complaints' claims. In this case, the declarations accompanying this response provide strong, probative evidence of the absence of coordination between Respondents and HFA on these ads. The declaration of Michael Ian Russell, the DCCC's Deputy Executive Director and Political Director, is especially important. 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

<sup>&</sup>lt;sup>46</sup> FEC Adv. Op. 1985-14 (DCCC) ("DCCC may report these expenditures as operating expenditures.").

<sup>&</sup>lt;sup>17</sup> See Exhibit A.

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

<sup>&</sup>lt;sup>49</sup> 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).

<sup>&</sup>lt;sup>50</sup> 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). <sup>51</sup> See Exhibits A and C.

<sup>52</sup> See Exhibit A.

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

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

#### CONCLUSION

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

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

Very truly yours,

Marc E. Elias

Brian G. Svoboda

Graham M. Wilson

Rachel L. Jacobs

Enclosure

Counsel to:

DCCC

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

<sup>&</sup>lt;sup>53</sup> 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 Kiluen 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 (!) Murphy for Congress on the advertisement discussed in the complaint in MUR. 7179 (m) Bryan Caforio for Congress on the advertisement discussed in the complaint in MUR 7182 (n) Friends of Christina M. Hartman on the advertisement discussed in the complaint in MUR 7187 and (o) LuAnn Bennett for Congress on the advertisement discussed in the complaint in MUR 7188 (each a "Campaign" or "Advertisement" or collectively the "Campaigns" and "Advertisements," respectively). I took the lead at DCCC for managing this advertising program. I supervised this program and all DCCC staff working on these Advertisements. I was also in contact, directly or indirectly through my staff, with each of the Campaigns involved in these Advertisements.
  - 3. This program was conceived by DCCC without any request, suggestion, or assent by HFA or its agents. DCCC believed that the advertising program would be an effective way to promote our Democratic House candidates and the Democratic Party, given the intense opposition among Democratic voters to Donald Trump and the policies and positions he espoused.
  - 4. I managed every aspect of the creation, production, and dissemination process for each of these Advertisements, starting with script development through the advertising buying phase of each Advertisement. To that end, with a core group of DC:CC staff, I worked directly with each Campaign and advertising vendor to draft each script and produce and edit each Advertisement.

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

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

Michael Ian Russell

# Exhibit B

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

PAGE 109105 OF 109107 FOR LINE 25 OF FORM 3X (To be used only by Political Committees in the General Election) NAME OF COMMITTEE (In Full) DCCC Has your committee been designated to make Full Name of Subordinate Committee coordinated expenditures by a political party committee? DCCC YES | NO Malling Address If YES, name the designating committee: 430 South Capitol Street, SE Democratic National Committee & 2nd Floor City ZIP Code State Pennsylvania Democratic Party Washington 20003-4024 DC Full Name (Last, First, Middle Initial) of Each Payes Memo flem Purpose of Expenditure Media Services Mundy Katowitz Media, Inc. Calegory/ Mailing Address 1322 G Strout, SE Type Date City 10 State Zip Coda "21<sup>"</sup> 2016 Washington DC 20003 Name of Fuderal Candidate Supported Office Sought: x House State: PA Amount 16 Hartman, Christina, . . Sanate District: 96070.00 Presidential Aggregate General Election 96070.00 Expenditure for this Candidate Transaction ID: 8F-953178 Full Name (Last, First, Middle Initial) of Each Payoe Purpose of Expenditure ... Memo item Category/ Type Mailing Address Data Zip Code City State Name of Federal Candidate Supported Office Sought: · House State: Amount Senate District: Presidential Aggregate General Election Expenditure for this Candidate > : ! Memo Item Purpose of Expenditure Full Name (Lust, First, Middle Initial) of Each Payee Category/ Type Mailing Address Date Zip Code City State Name of Federal Candidate Supported Office Sought: House State: Amount Sonale District: Presidential Aggregate Goneral Election Expenditure for this Candidato 96070.00 SUBTOTAL of Expenditures This Page (optional)...... 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

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

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## 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 47535 OF 47535 FOR LINE 25 OF FORM 3X (To be used only by Political Committees in the General Election) NAME OF COMMITTEE (In Full) DCCC Has your committee been designated to make . Full Name of Subordinate Committee coordinated expenditures by a political party committee? **DCCC** Ŭ NO x YES Mailing Address If YES, name the designating committee: 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 Payee ☐ Memo Item Purpose of Expenditure **Media Services** Buying Time, LLC Category/ Mailing Address 650 Massachusetts Avenue, NW Type Date Suite 210 Zip Code City State 2016 10 Washington DC 20001 Name of Federal Candidate Supported Office Sought: House State: WI Amount 08 Nelson, Tom, , , Senate District: 32700.00 **Presidential** Aggregate General Election 32700.00 Expenditure for this Candidate Transaction ID: SF-951664 Full Name (Last, First, Middle Initial) of Each Payee Purpose of Expenditure ☐ Memo Item **Media Services** Adelstein & Associates LLC Category/ Type Mailing Address 222 West Ontario Street, Suite 600 Date State Zip Code City 2016 Chicago 10 60654 Name of Federal Candidate Supported Office Sought: House State: Amount Senate District: 10 Schneider, Bradley, Scott, , Presidential 48100.00 Aggregate General Election 48100.00 Expenditure for this Candidate Transaction ID: SF-951461 Purpose of Expenditure Memo Item Full Name (Last, First, Middle Initial) of Each Payee 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 80800.00 SUBTOTAL of Expenditures This Page (optional)..... 1516806.99 TOTAL This Period (last page this line number only).....

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## SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)

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

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE PAGE 63515 OF 63518 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 boon designated to make Full Name of Subordinate Committee coordinated expenditures by a political party committee? DCCC x YES NO If YES, name the designating committee: Mailing Address 430 South Capitol Street, SE **Democratic National Committee &** Since California Democratic Party Washington 20003-4024 Full Name (Last, First, Middle Initial) of Each Payee Memo Item Purpose of Expenditure Media Services The New Media Firm, Inc. Category/ Type Mailing Address 1730 Rhode Island Ave., NW Date Suite 213 Clly State Zip Code 09 20 2016 Washington DC 20036 Name of Federal Candidate Supported Office Sought: State: CA Amount 49 Applegate, Doug, Loren, . Senate District: 91200.00 : Presidential Aggregate General Election 91200.00 Expenditure for this Candidate Transaction ID: SF-949904 Full Name (Last, First, Middle Initial) of Each Payee Purpose of Expenditure Memo item Media Services Screen Strategies Media, LLC Category/ Турс Mailing Address 11150 Fairfax Blvd Date Suite 505 Zip Code City State 23 09 2016 22030 Fairfax VA Name of Federal Candidate Supported Office Sought: 'X House State: CA Amount District: 25 Senata Caforio, Bryan, , , Presidential 46490.00 Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID : SF-950014 Purpose of Expenditure Full Name (Last, First, Middle Initial) of Each Payee : Merno Item Media Services Screen Strategies Media, LLC Category/ Type. Mailing Address 11150 Fairfax Blvd Date Suite 505 Zip Code City State 2016 09 28 22030 Name of Federal Candidate Supported Office Sought: **≭** House State: Amount 25 Senate District: Caforio, Bryan. . . Presidential 13431.04 Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID: SF-950737 151121,04 SUBTOTAL of Expenditures This Page (optional).....

# Exhibit C

# BEFORE THE FEDERAL ELECTION COMMISSION

## **DECLARATION OF MAURA JOHNSON - MUR 7179**

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

MJ 12/21/16

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

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

Maura Johnson

## BEFORE THE

## FEDERAL ELECTION COMMISSION

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

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

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

- ii. the intended audience for the Advertisement;
- iii. the means or mode of the Advertisement;
- 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 Zurd day of December, 2016.

David Dixor

Richard I

# Exhibit D

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 9 OF 9
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼
·	C C00000935
Check if   24-hour report   48-hour report   New report   Amends report filed	ou frank i o and i hasharda
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
	Amount
City State Zip Code	48000.00
Alexandria · VA 22310	Transaction ID : SE-952383  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  Out  Out  Out  Out  Out  Out  Out  Ou	10 18 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump Oppose	President Sanate State:
	rsement For: Primary General
Per Election for Office Sought 2742321.20 2016	Other (specify)
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media, LLC Date of Dissemination: 10/19/16	10 10 10 10 10 10 10 10 10 10 10 10 10 1
Mailing Address 222 West Ontario Wost-	the board to be and the second
Suite 600	Amount
City State Zip Code	-81321.00
Chicago IL 50854	Transaction ID : SE-952867  Date of Disbursement or Obligation
Purpose of Expanditure Media Buy  Catagory/ Type  Out	10 14 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Oonald J. Trump	President Senate State:
	rsement For: Primary X General
Per Election for Office Sought 2742321.20 2016	Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	129321.00
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	273146.39
Under ponalty of perjury I cortily that the independent expenditures reported herein were not ma 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.	de in cooperation, consultation, or concert, or (If the reporting entity is not a political
Kelly C. Ward	117 14 1 2 2 2 1 4 1 4 1 4 1 4 1 4 1
Signalure Date 10	2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES  (Schodule 5)  PAGE 48 OF 60						
(5)	:hedule E)	FOR SE OF FORM 24/48				
	ME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼				
_	C C00000935					
Ci	eck if  X  24-hour report   48-hour report    X  New report   Amends report	filed on (m 'n) / (m 'n) / (m 'n)				
	Full Name of Payee Screen Strategies Media, LLC  Date of Dissemination: 10/24/16	Date of Public Distribution/Dissemination				
	Mailing Address 11150 Fairlax Blvd	10 24 2016				
	Suite 505	Amount				
	City Stato Zip Code	45000.00				
	Fairfax VA 22030	Transaction ID : SE-952072 Date of Disbursement or Ohligation				
	Purpose of Expenditure Media Buy  Category/ Type  Out	10 17 2018				
	Name of Federal Candidato Support	Office Sought: House District: 00				
	Donald J. Trump Oppose	President Senate State:				
		Disbursement For: Primary General 2016   Other (specify) >				
	Full Name of Payee	Date of Public Distribution/Dissemination				
	AL Media LLC	In and ' thing' ' the deal and the				
	Date of Dissemination: 10/24/16  Mailing Address 222 W Optatio St	10 24 2016				
	Zaz W Gilibilo Gi	Amount :				
	Suite 600  City State Zip Code	131250.00				
	City State Zip Code Chicago IL 60654	Transaction ID : SE-953187 Date of Disbursement or Obligation				
	Purpose of Expenditure Media Buy  Category/ Type  O04	10 21 2016				
	Name of Federal Candidate Support	Office Sought: House District: 00				
	Donald J. Trump Oppose	President Senate State:				
		Disbursement For: Primary Seneral 2016				
_	la ca fangliga d'i kapilana d'i kapilana de la partir dela partir de la partir de la partir de la partir de la partir dela partir de la partir de la partir de la partir de la partir dela partir de la partir dela pa	Other (specify) ▶				
	(a) SUBTOTAL of Itemized Independent Expenditures	176250.00				
	(b) SUBTOTAL of Uniternized Independent Expenditures	<b>&gt;</b>				
	(c) TOTAL Independent Expenditures	be an experience of the second control of th				
	Under penalty of perjury I certify that the Independent expanditures reported herein were nowlin, or at the request or suggestion of, any candidate or authorized committee or agent of party committee) any political party committee or its agent.	ol made in cooperation, consultation, or concert either, or (il the reporting entity is not a political				
	Kaliy C. Wend	The state of the same of the s				
	Signature	10 25 2016				

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	[Diot 5: 05 60
(Schedule E)	PAGE 51 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER Y
DCCC	C c00000935
Check II 24-hour report 48-hour report New report Amends report file	d on ["-"] / [0.7:6] / [ **********************************
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media LLC Date of Dissemination: 10/25/16	10 25 2016
Malling Address 222 W Ontario St	25) 2010
Suite 600	Amount .
City State Zlp Code	9000.00
Chicago IL 60854	Transaction ID : SE-953228  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  O04	10 24 2016
Name of Federal Candidate Support Office	ce Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
	pursement For: Primary General
Per Election for Office Sought 4369947.93	
Full Name of Payes	Date of Public Distribution/Dissemination
Canal Partners Media, LLC Date of Dissemination: 10/25/16	10 25 2016
Mailing Address 25 Whitlock Place	1 10 1 25 1 2010
Suite 200	Amount
City State Zip Code	184082.00
Mariella GA 30064	Transaction ID : SE-952497  Date of Disbursement or Obligation
Purpose of Expanditure Media Buy  Category/ Type  Category/ Type	10 19 2016
Name of Federal Candidate Support Office	es Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Par Election for Office Sought 4369947.93 ; 1,201	oursement For: Primary General
Por Election for Ginder Gought	Other (specify)
	Continue to the second section of the section of
(a) SUBTOTAL of Itemized Independent Expenditures	193082.00
·	a a mark to advandession and
(b) SUBTOTAL of Uniternized Independent Expenditures	·
(c) TOTAL Independent Expenditures	أوالمنطان مسوراتك والمراجع
Under penalty of perjury i certify that the independent expenditures reported herein were not in with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert er, or (if the reporting entity is not a pullicat
with, or at the request or suggestion of, any candidate or authorized committee or agent of either	ade in cooperation, consultation, or concert or, or (if the reporting entity is not a publicat

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES  (Schedule F)  PAGE 23 OF 23						
(Schedule E)	FOR SE OF FORM 24/48					
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER Y					
DCCC	C c00000935					
Check if 24-hour report 48-hour report Now report Amends report filed	ou ( ), ( ) ( Lo Lo ) ( LA E Amin's Andre					
Full Name of Payer Moore Campaigns, LLC	Date of Public Distribution/Dissemination					
Mailing Address 447 Irving St, NW	10 28 2016 Amount					
	many de lanetamparatra de ministra de se					
City State Zip Code Washington DC 20010	Transaction ID: SE-954234 Dulo of Disbursement or Obligation					
Purpose of Expenditure Mail Services  Category/ Type: 000	10 27 2016					
Name of Federal Candidate Support Office	Sought: House District: 00					
De ald I was	President Senate State:					
Calendar Yoar-To-Date Diabut Per Election for Office Sought 4593586.81 2016	rsoment For: Primary Goneral					
Full Manager of Duran	☐ Other (specify) ▶					
Full Name of Payee AL Media LLC	Date of Public Distribution/Dissemination					
Mailing Address 222 W Ontario St	Amount					
Suite 600 City State Zip Code	30525.00					
Chicago IL 60654	Transaction ID : SE-953928  Date of Disbursement or Obligation					
Purpose of Expenditure Media Buy  Category/ Type  Category/ Type	10 26 2016					
Name of Federal Candidate Support Office	Sought: House District: 00					
Donald J. Trump Oppose	President Senate State:					
Celendar Year To-Date Per Election for Office Sought  Disbut 2016	rsement For:   Primary   General   Other (specify) >					
	ment of the first of the commentation of the comments					
(a) SUBTOTAL of Itemized Independent Expenditures	34997.36					
	Court (in Second-randows & name of an expension is seen.)					
(b) SUBTOTAL of Uniternized Independent Expenditures						
	a the final-section of modern to and					
(c) TOTAL Independent Expenditures	1588663.18					
Under penalty of perjury I cortily that the independent expenditures reported herein were not man 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.	do in cooperation, consultation, or concert or (if the reporting entity is not a political					
Kelly C. Ward	a tara tara tara tara					
Signature Date 10	, xa ' 1 5016					

# Image# 201610319037014651 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

(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	filed on his his / pro / yeveryeve
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 Zip Code Chicago IL 60654	80000.00 Transaction ID : SE-954371 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type 004	10 / D F 0 / V Y S Y S Y S Y S Y S Y S Y S Y S Y S Y
Name of Federal Candidate Support  Trump, Donald, J., Oppose	Office Sought: House District: 00  President Senate State:
Calendar Year-To-Date	Disbursement For: Primary
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 Zip Code Chicago IL 60654	67387.50 Transaction ID : SE-954372 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Typo 004	10 28 / 2016
Name of Federal Candidate  Trump, Donald, J., ,   Ø Oppose	Office Sought: House District: 00  X President Senate State:
Calendar Year-To-Date Per Election for Office Sought 4979620.65	Disbursement For: Primary   General  Other (specify)   Other (specify)   Other (specify)   □ Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	147387,50
(b) SUBTOTAL of Unitemized Independent Expenditures	<b>&gt;</b>
(c) TOTAL Independent Expenditures	>
Under penalty of perjury I certify that the independent expenditures reported herein were new 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.	
Ward, Kelly, C , [Flectronically Filed] Date Signature	10 31 2016
	<u></u>

24/48 HOUR REPORT OF INDEPENDEN (Schedule E)	T EXPEND	ITURES		PAGE 51 OF 52 . FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			1 ===	واستنصب والمناف المساور
DCCC -			C	C00000935
Check if 24-hour report 48-hour report	X New rej	port Amends repo	رم ادا ort filed on	the rest
Full Name of Payer Screen Strategies Media, LLC			Date of Pu	pblic Olstribution/Olssemination
Date of Dissomination: 1 Malling Address 11150 Fairfax Blvd	0/18/16	<del></del>	10	18 2016
			Amount	
Suite 505	21-1-		<b></b>	124808 80
City Fairlex	State VA	Zıv Code 22030	Transactio	134898.50 on ID : SE-952377 sbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	Date of Di	
Name of Federal Candidate		-1 :Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	President	
Calendar Year To-Date Per Election for Office Sought	, , ,	613000.20	Disbursement For 2016 Other	: Primary X General
Full Name of Payee Kully Hali, LLC Date of Dissemination: 1 Mailing Address 1932 1st Ave. Sulte 203	0/18/16			ublic Distribution/Dissemination
			Amouni	
City	State	Zip Code		6225.00
Scattle	WA	98101	Date of Di	n İD : SE-952379 shursement or Obligation
Purpose of Exponditure Media Buy Media Production		Category/ Type	10	18 2016
Name of Federal Candidate		: Support	Office Sought:	House District: 00 ·
Oonald J. Trump		X. Oppose	President	Schale State:
Calendar Year To-Date Por Election for Office Sought	, ,	2613000.20	Disbursement For 2016 , Other	
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(b) 300101AE of Officeringed independent Expenditi	0192	***************************************	· <b>&gt;</b>	•
(c) TOTAL Independent Expenditures		·	•	•
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ite or authorize	; reported herein were d committee or agent o	not made in eqope of either, or (if the m	eration, consultation, or concert eporting entity is not a political
Kelly C Ward			- > 2 3	: + . •
Signatura		Date	10 19	9 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	[nos 10 05 10
(Schedule E)	PAGE 48 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER V
DCCC	C C00000935
	C C00000939
Check if X 24-hour report 48-hour report X New report Amends report filed	ora prityy ion
Full Name of Payee	Ozie of Public Olstribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/24/16	10 24 2016
Mailing Address 11150 Fairlax Blvd	
Suite 505	Amount
City State Zip Code	45000.00
Fairfax VA 22030	Transaction ID : SE-952072
Purpose of Expanditure	Date of Disbursement or Obligation
Media Buy Category/ Typo 004	10 17 2016
Name of Federal Candidate Support Office	e Sought: , House District: 00
Donald J. Trump X Oppose X	President . Senate State:
Calendar Year-To-Date Disbu	ursement For: , i Primary 💢 General
Per Election for Office Sought , 3653174.61 2016	r  Other (specify) ▶
Full Name of Payee	Oate of Public Distribution/Dissemination
AL Media LLC	
Date of Dissemination: 10/24/16	10 24 2016
Mailing Address 222 W Ontario St	Amount
Suite 600	
City State ZIp Code	131250.00 Transaction ID : SE-953187
Chicago II. 60654	Date of Disbursement or Obligation
Purpose of Expenditure Category/ Media Buy Type 004	10 21 2016
Туро ООТ	., 2010
Name of Federal Candidate Support Office	e Saught: House District: 00
Donald J. Trump	President Senate State:
Calendar Year-To-Daie Disb	ursement For: 1 Primary IX General
Per Election for Office Sought 3653174.61 2016	Cther (specify) ▶
_ <del> </del>	
(a) SUBTOTAL of Iternized Independent Expenditures	178250.00
(a) Cool of the Co	,
(b) SUBTOTAL of Uniternized Independent Expenditures	
(a) and the area and animated transfer experiences in the second	
(c) TOTAL Independent Exponditures	}
(a) 10.15c mechanic expenditures.	
Under penalty of perjury I certify that the independent expenditures reported herein were not ma	ade in cooperation, consultation, or concert
with, or at the request or suggestion of, any candidate or authorized committee or agent of eithe party committee) any political party committee or its agent.	if or fit the tabouting entity is not a bolitical
Rede C. Ward	4 1: 7 / 7 /
Date 1	0 25 2016
Signature	

	I/48 HOUR REPORT OF IN( chedule E)	DEPENDENT EXP	PEND	ITURES		PAGE 52 OF 60. FOR SE OF FORM 24/48
N	AME OF COMMITTEE (In Full)			<del></del>	-	
	OCCC					FEC IDENTIFICATION NUMBER Y
						C C00000935
CI	heck if 24-hour report 48-1	nour report X N	ew rep	ort Amends repo	ort filed	ion 1 u E + V +
_	Full Name of Payer	<del></del>				Date of Public Distribution/Olssemination
	Screen Strategies Media	1, LLC Dissemination: 10/25/16				10 25 2016
	Mailing Address 11150 Fairlax Blvd					10 23 2010
	Suite 505					Amount
	City	State		Zip Code		64326,00
	Faidox	ı, VA		22030		Transaction ID : SE-953184
	Purpose of Expenditure Media Buy		<del></del>	Category/ Type 004	•••	Date of Disbursament or Obligation
	Name of Federal Candidate			Support	Olfic	e Sought: House District: 00
	Donald J. Trump	•		X Oppose	ı	President Senale State:
		· · · · · · · · · · · · · · · · · · ·				ursement For: Primary X General
	Calendar Year-Tu-Date Per Election for Office Sought		.43	369947.93 <sub>.</sub>	2016	Other (specify)
	Full Name of Payes				<u>.                                    </u>	Date of Public Distribution/Dissemination
	Buying Time, LLC				Í	
	A 4- No A - A - A	Dissemination: 10/25/16		<u></u>		10 25 2016
	950 11055501050	elis Avenue, NVV				Amount
	Suite 210	State		Zin Code		, 62488.00
	Washington	DC		20001		Transaction ID : SE-953185  Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy	•		Category/ Type 004		10 21 2016
	Name of Federal Candidate			Support	Offic	e Sought: House District: 00
٠	Donald J. Trump		-	X Oppose	×	President Senate State:
	Calendar Year-To-Date				Disb	ursement For: Primary General
	Per Election for Office Sought	3		4369947.93	2016	Other (specify)
	(a) SUBTOTAL of Itemized Independ				· <b>&gt;</b>	126814.00
	(c) TOTAL Independent Expenditures				. •	, ,
	Under penalty of perjury I certify that with, or at the request or suggestion party committee) any political party c	of, any candidate or auti	ditures horized	reported herein were committee or agent o	nol mi	ede in cooperation, consultation, or concert r, or (if the reporting entity is not a political
	Kelly C. Ward					e e e e e
	Signaturo	e and a second	•	Oeie	. 1	0 25 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
(Schedule E)	PAGE 8 OF 8
NAME OF COMMITTEE (In Full)	
DCCC	FEC IDENTIFICATION NUMBER *
· .	) C C00000935
Check If X 24-hour report 48-hour report New report Amends report filed	on a transfer of the state of t
Full Name of Payee	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/31/16	10 31 2016
Mailing Address 11150 Fairlax Blvd	
Suite 505	Amount
City State Zip Code	55000.00
Fairfax VA 22030	Transaction ID : SE-953293  Oate of Dishursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type 004	10 25 2016
Name of Federal Candidate Support Office	e Sought: House District: 00
1	President Senate State:
Oleh	Primary IV Garrent
Per Election for Office Sought 4979620.65 2016	Other (specify)
Full Name of Payee AL Media LLC Date of Dissemination: 10/31/16	Date of Public Distribution/Dissemination
Mailing Address 222 W Ontario SI	70 31 2010
Suite 600	Amount
City State Zip Code	115875.00
Chicago IL 60654	Transaction IO : SE-954178  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  O04	10 27 2016 °
Name of Federal Candidate Support Offic	e Sought: House District: 00
Donald J. Trump X, Oppose X	President Sonate State:
Calendar Year To-Dato Disb	ursament For:   Primary X General
Per Election for Office Sought 4979620.65 2016	Otner (specify) >
(a) SUBTOTAL of Itemized Independent Expenditures	170875.00
(b) SUBTOTAL of Uniternized Independent Expenditures	r
(c) TOTAL Indopendent Expanditures	433711.75
Under penalty of perjury I certify that the independent expenditures reported herein were not make 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	
	0 31 2016

## Image# 201611049037121060 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

Schedule E)	PAGE 10 OF 11 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	C IDENTIFICATION NUMBER ▼
DCCC	The state of the s
	C00000935
Check If X 24-hour report 48-hour report X New report Amends report filed on	1 Lozof , LAAAAAA
Full Name of Payee Date of P	ublic Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 11/04/16	04 2016
Malling Address 11150 Fairfax Blvd	المستشما المناا
Suite 505	
City State Zip Code	40000.00
Fairfax VA 22030 Transacti	ion ID : SE-954176 isbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  004  10	
Name of Federal Candidate Support Office Sought:	House District: 00
Trump, Donald, J., .   K Oppose K President	Senate State:
Calendar Year-To-Date Disbursement Fo	or: Primary K General
Per Election for Office Sought 6419383.70 2016	r (specify) ▶
	Public Distribution/Dissemination
AL Media LLC Date of Dissemination: 11/04/16	04 2016
Mailing Address 222 W Ontario St	الاستنسادية المتفسا أس
Suite 600	
City State Zip Code	3750.00
1 Chicago	on ID : SE-954988 Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  O04  11	04 2016
Name of Federal Candidate Support Office Sought:	House District: 00
Trump, Donald, J., ,	Senate State:
Calendar Year-To-Date Disbursoment Fo	or: Primary 🗴 General
440000 70 \$   2016	r (specify) >
\$Plan School and	
(a) SUBTOTAL of Itemized Independent Expenditures	43750.00
· management .	
(b) SUBTOTAL of Unitomized Independent Expenditures	أسطمانته والمعادنة انسام عادوات
(c) TOTAL Independent Expenditures	
(b) Forme independent experience of the control of	
Under penalty of perjury I certify that the independent expenditures reported herein were not made in coop with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the party committee) any political party committee or its agent.	peration, consultation, or concert reporting entity is not a political .
Ward, Kelly, C [Electronically Filed] Date 11 (	767 / FYTYTYTY 04 2016
Signature [Electronically Filed] Date 11 !	

24/48 HOUR REPORT OF INDER	ENDENT EXPENDI	TURES		·
(Schedule E)			PAGE FOR S	9 OF 11 SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	·	7	FEC IDENTIF	ICATION NUMBER ¥
DCCC			C c00000	935
Check if X 24-hour report 48-hour	report 🗶 New repo	ort Amends repor	I filed on	, , , , , , , , , , , , , , , , , , , ,
Full Name of Payee Screen Strategies Media, L	LC emination: 11/04/16		Date of Public Distrib	4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Mailing Address 11150 Fairfax Blvd			11 3 204	2016
Suite 505			Amount	
City	, State	Zip Code		13000.00
Faldax	VA	22030	Transaction ID : SE- Date of Disbursemen	
Purpose of Expenditure Media Buy		Category/ Type 004	11 03	
Name of Foderal Candidate		Support	Office Sought Hous	se District: 00
Trump, Donald, J., ,		K Oppose	× President Sens	alc State:
Calendar Year-To-Date Per Election for Office Sought	A Company of the San Company of the	6419383.70	Oisbursement For: ☐ Pr 2016 ☐ Other (specify) ▶	imary 🗶 General
Full Name of Payee The New Media Firm, Inc. Date of Diss	emination: 11/04/16		Date of Public Distrit	المشخصمينية ، أمع
Mailing Address 1730 Rhode Island A	ve., NW		Amount	m.ā <del>kankankanku</del> d
Suite 213	·			اسمسسسس
City	State	Zip Code	المسلسة سيا	46000.00
Washington	DC	20036	Transaction ID : SE-9 Date of Disbursemen	
Purpose of Expenditure Media Buy	•	Category/ Type 004	11 03	2016
Name of Foderal Candidate		Support	Office Sought: Hou	se Oistrict: 00
Trump, Donald, J., ,		K Oppose	× President Sen	ale State:
Calendar Year-To-Date Per Election for Office Sought	و الماسية الما	6419383.70	Disbursement For: Post Post Post Post Post Post Post Post	rimary 🗷 Goneral
(a) SUBTOTAL of Itemized Independent	Expenditures		<b>•</b>	59000.00
(b) SUBTOTAL of Uniternized Independe	nt Expenditures		b Indamen Tinday	
(c) TOTAL Independent Expenditures	,		>	in the desired
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 committee or agent o	not made in cooperation, co either, or (if the reporting e	nsultation, or concert ntity is not a political
Ward, Kelly. C., ,	[Electrone	ically Filed  Dale	11 04	2016
Signature		_	Section beatening in	, <del>Amerika da seri</del>

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## SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

	,					24 OF 109107
NAME OF COMMITTEE (In Full)	<del></del>	<del></del>				24 OF FORM 3X
DCCC				FEC IDE	NTIFICATI	ION NUMBER V
5666				C	C00000935	
					····	·
Check if : . 24-hour report . 48-hour report	New re	port Amends repo	bslit h	on .	•	
Full Name of Payee Screen Strategies Media, LLC		, Memo	ltem	Date of Public I	Distribution	/Dissemination
Date of Dissemination: 11/07/16 - 24 hours prior to	election day	·		11	07'	2015
Mailing Address 1/150 Fairtax Blvd			-	Amount	-	
Suite 505	T Ctata	1 7in Code				38173.50
City Fairfax	Stato	Zip Code		Transaction ID	SF-9546	
	<u> </u>			Date of Disburs		
Purpose of Expenditure Media Buy		Category/ Type (10)4	ı	11	01	2618
Name of Federal Candidate:		Support	Office	e Sought:	House	District:
Trump. Donald, .f., ,		≠ Oppose	×	President	Senale	State:
Catendar Year-To-Date Per Election for Office Sought		6693372.69	Disbi 2016	ursement For: :		y × General
		11.50		Other (sper		(Classified
Full Name of Payee The New Media Firm, Inc. Date of Olssemination: 11/01/16		Memo	Itern	Uate of Public (	DISTRIBUTION	/Lussemination 2016
Mailing Address 1730 Rhode Island Ave., NW					•	2013
Suite 213				Amount		
City	State	Zip Code				3566.00
Washington	DC	20038		Transaction ID		
Purpose of Expenditure		Category/		1		
Megia Production		Type 004		11	01	2016
Name of Federal Candidate:		Support	Office	e Sought:	House	District:
Trump, Donald, J., ,		x Oppose	×	President	Scnale	State:
Calendar Year-To-Date Per Election for Office Sought		6693372.69	Disbu 2016	ursement For:	Primary	y 🂢 General
Per Election for Chice Sought				Other (spec	city) ▶ ·	
(a) SUBTOTAL of Illemized Independent Expenditure	S , , , , , , , , , , , , , , ,		<b>.</b>			41739.50
(a) SUBTOTAL of Uniternized Independent Expenditu	nes	.**	• •			
(a) TOTAL Independent Expenditures		***************************************	•	•	•	 
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Under penalty of perjury I certify that the independ with, or at the request or suggestion of, any candid party committee) any political party committee or its	late or authorize	is reported herein were ad committee or agent o	not m of eithe	ade in cooperatio st, or (if the repor	in, consulta ting entity i	ition, or concert is not a political
Ward Kelly, C.,	/Electronically I	ena				
Signature	herecomments a	Oste	. 1	2 08	50	16 .

24/48 H( (Schedul	OUR REPORT OF INDEPENDE e E)	ENT EXPEN	IDITURES			PAGE 51	
NAME OF	COMMITTEE:(In Full)				<del></del>		F FORM 24/48
DCCC					. LEC II	DENTIFICATI	ON NUMBER #
					Ċ	C00000935	
Check if	24-hour report. 248-hour report	X New	report Amends rep	ort filed on	fu v	to .	, , ,
Full Na	me of Payee			Date	of Public	: Distribution	/Dissemination
Scre	en Strategies Media, LLC Date of Dissomination	n: 10/18/16			10	. , , ( 18	2016
Malling	Address 11150 Fairfax Blvd						
1	Suite 505			Amo	וחטו		
City		Slate	Zip Code				134898.50
Fairfex	!	VA	22030	Tran Date	saction I of Disbu	D.: SE-9523 Irsament or (	77 Obligation
Purpos Media	e of Expenditure Buy		Calegory/ Type 004	j	"า0"	11	2016
Name	of Federal Candidate :		Support	Office Soun	iht: i	House	District: 00
Donak	J. Trump		× Oppose	X Presid	_	Senate	
[ <u>-</u>	elendar Year-To-Date	. <del>,</del>	*****				General
	er Election for Office Sought	. ,	2613000.20	1 2016	Olher (sip		 
Full Na	me of Payee	<del></del>					/Dissemination
	Hall, LLC	10110/16		1		18	
Mailing	Address 1932 1st Ave, Suite 203	n. 10/10/10			10	18	2016
	1932 18t AVE, Stille 203			Amo	เกเ		
City		State	Zip Code				6225.00
Soattl	9	WA	98101	Trans	saction IC	o : SE-95237 Irgement or (	9 Obligation
	e of Expenditure Buy Media Production		Category/ Type				2016
Name	of Federal Candidate		, Support	Office Sout	iht:	. House	District: 00
Donald	i J. Trump			i X Presi	deni :	Senate	State:
	elendar Year-To-Date er Election for Office Sought		2613000.20	Olsburseme 2016 -	ent For:	Primary ecity) >	General
		<del></del>					<del></del>
(a) SUE	TOTAL of Itemized Independent Expend	itures		··· <b>&gt;</b>			141123.50
(b) SUE	TOTAL of Uniternized Independent Expe	nditures	***************************************	··· <b>•</b>			
						•	
(c) TOT	AL Independent Expenditures		***************************************	··· <b>&gt;</b>	•	•	
with, or	onally of perjury I certify that the indeperat the request or suggestion of, any canomittee) any political party committee or	didate or authoriz					
	Kelly C. Ward		·	., r		×.	
Signa	dure		Date	e 10	19	201	5

24	48 HOUR REPORT OF INDEPENDENT EXP	ENDI	TURES			
	chedule E)				PAGE 3 OF	3 24/48
N/	ME OF COMMITTEE (In Full)		<del></del>		FEC IDENTIFICATION NUM	
	CCC				C C00000935	
					102 C0000939	احسا
Ch	ack if 24-hour report X 48-hour report X N	ew repo	ort [ ] Amends repo	ort filed	ou [ a a ] , [ a a e ] , L a a a	7"4","4")
	Full Name of Payee				Date of Public Distribution/Dissemi	nstion
	Buying Time, LLC  Date of Dissemination: 10/11/16		•		10 11 20	7°, 1°, 3
	Mailing Address 650 Massachusetts Avenue, NW	-			المراجع المستحددة المعارية	
	Suite 210			1	Amount	-
	City State		Zip Code		5750	0.00
	Washington DC		20001	İ	Transaction ID : SE-951439 Date of Disbursement or Obligation	,
	Purpose of Expenditure Media Buy		Cutogory/ Type 004		10 11 20	أدامعيث
	Name of Federal Candidate		Support	Office	Sought: House District:	00
	Trump, Donald, J., ,		X Oppose		President Senate State:	
			1 may a series of			Genoral
	Calendar Year To Date Per Election for Office Sought	بسلامسدا	1459931.62	2016	Other (apocify)	
	Full Name of Payee				Date of Public Distribution/Dissemi	
	Screen Strategies Media, LLC Date of Dissemination: 10/12/16				10 12 20	47777)
	Mailing Address 11150 Fairlax Blvd					
	Suite 505				Aniount	
	City State	<u> </u>	Zip Code		7463	2.00
	Fairfax VA		22030		Transaction ID : SE-951438  Date of Disbursement or Obligation	1%+-1 1
	Purpose of Expenditure Media Buy		Category/ 004		10 11 20	16
	Name of Federal Candidate		Support	Office	Sought:   House District:	00
	Trump, Donald, J., .		Oppose	l	President Senato State:	
	Celendar Year-To-Date	1-	Section American	Diab	the mant For   Primary   Y	Goneral
	Per Election for Office Sought	۔ اصب ا	1534563.62	2016	Other (specify)	
	(e) SUBTOTAL of Itemized Independent Expenditures	*************************			132132	.00
	(b) SUBTOTAL of Unitemized Independent Expenditures		\$4 <b>\$</b> \$		والمعالم المساية المايات	• 1
	(0)				han a finish approve of suffered	r. + 3
	(c) TOTAL Independent Expenditures	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		. •	170032	.00
	Under penalty of perjury I certify that the independent expenivith, or at the request or suggestion of, any candidate or autoparty committee) any political party committee or its agent.	ditures horized	reported herein were committee or agent o	not ma	de in cooperation, consultation, or of the cooperation of the cooperation and the cooperation of the coopera	concert'
	Ward, Kelly, C.,			٧.	as explored to year	
	Signature	lectroni	cally Filed Date	. 1	0 , 13 , 2016	
	-3					

	/48 HOUR REPORT OF INDEPENDE	ENT EXPEND	NTURES		PAGE 17 OF 17
	chedule E)				FOR SE OF FORM 24/48
	AME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER V
	OCCC				C C00000935
Ch	neck if 🔀 24-hour report 🔲 48-hour report	New re	port Amends repo	ort filed	don a war to field a factor from
	Full Name of Payoo Screen Strategies Media, LLC	<del></del>		******	Date of Public Distribution/Dissemination
	Date of Dissemination	n: 10/20/16			10 20 2016
	Mailing Address 11150 Fairfax Blvd .				Amount
	Suite 505				Amount
	City	State	Zip Code		107040.00
	Fairfax	VA	22030		Transaction ID : SE-952389 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy		Category/ 004	_:	10 18 2016
•	Name of Federal Candidate		Support	Offic	e Sought: House District: 00
	Donald J. Trump		Coppose Coppose	1X	President Senate State:
	Calender Year-To-Date	. ,	989611.20	Disb 2016	ursement For: Primary K General
	Per Election for Office Sought	· , · , ·			Other (specify) >
	Full Name of Payer AL Media LLC Date of Dissentination	n: 10/20/16			Date of Public Distribution/Dissemination
	Mailing Address 222 W Onlario St	***************************************			j ''
	Suite 600				Amount
i	City	State	Zip Code		140250.00
	Chicago	IL	60654		Transaction ID : SE-952071 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy		Category/ 004		, 10 17 2016
	Name of Federal Candidate		Support	Ottic	e Sought: House District: 00
	Donald J. Trump		i∑i Oppose	X	President Senate State:
	Calendar Year-To-Date Per Election for Office Sought	•	2989611.20	Disb 2016	
لــــا		1	. af af a fee	<u> </u>	Other (specify)
	(a) SUBTOTAL of Itemized Independent Expendit	ures		· <b>&gt;</b>	247290.00
	(b) SUBTOTAL of Uniternized Independent Expen	nditures		. •	
	(c) TOTAL Independent Expenditures	***************************************		. •	652070.38
,	Under penalty of perjury I certify that the indeporwith, or at the request or suggestion of, any cand party committee) any political party committee or i	idate or authorized	s reported herein were d committee or agent o	not ma	ade in cooperation, consultation, or concert ir, or (if the reporting entity is not a political
	Kelly C. Ward		Date	: . 1	ม , แ ฮ รัต ซ . วุ . รัง 10 21 2016
	Signature				

	./48 HOUR REPORT OF INDEPEND chedule E)	ENT EXPEN	DITURES		PAGE 15 OF 15
ÑZ	AME OF COMMITTEE (In Full)	<del></del>			FOR SE OF FORM 24/48
	OCCC				FEC IDENTIFICATION NUMBER
					C c00000935
Cr	neck II 24-hour report 48-hour report	X New r	eport Amends rep	ort filed	on and a second of the second
	Full Name of Payee		<del> </del>		Date of Public Distribution/Dissemination
	Prism Communications, Inc.  Oate of Disseminati	on: 10/27/16		_ }	10 27 2016
	Mailing Address 1000 Potomac Street, NW				Amount
	Suite 420			]	* *** *** *** ***
	City	State	Zip Code	}	3291.58
	Washington	DC	20007		Transaction ID : SE-953927 Date of Disbursement or Obligation
!	Purpose of Expenditure Media Production		Category/ Type 004		10 26 2016
	Name of Federal Candidate		Support	Office	Sought: House District: 00
	Consid J. Trump		Oppose	X	Prosident Senato State:
	Calendar Year-To-Date	• •;	-		ursement For: Primary   X General
	Per Election for Office Sought	1 2 21	4550355.45	2016	Other (specify)
	Full Name of Payee	······································	<u></u>	<del></del> -	Date of Public Distribution/Dissemination
	76 Words Corp.  Date of Disseminati	-n: 10/26/16		}	
	Na-25 A 24	JII. 10/20/16			10 26 2016
	112130131.41				Amount
	Floor#1				
	City Washington	State DC	Zip Code 20001	}	5500.00 Transaction ID : SE-954171
	Purpose of Expenditure	<del></del>			Date of Disbursement or Obligation
	Media Production		Category/ 004		10 27 2016
	Name of Federal Candinate		Support	Office	e Sought:     House District: 00
	Donald J. Trump		Oppose	区	Prosident Senate State:
•	Calendar Year-To-Date	•	4436718.92	Disbu 2016	ursement For: Primary 🔀 General
	Per Election for Office Sought	اص افارا	4430710.92	2010	Other (spacify) >
	(a) SUBTOTAL of Itemized Independent Expend	diures		>	8791.58
	(b) SUBTOTAL of Unitemized Independent Exp	anditures		··· <b>&gt;</b>	ا مسوده ده سد د ا المستحد معالم د
	(c) TOTAL Indopendent Expenditures			··· <b>&gt;</b>	771178,77
	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 authoriz			
	Kally C. Ward		Dat	u e 1	11 / 5 P Y Y Y Y T 0 27 2016
	Signature				• • • • · · ·

	1/48 HOUR REPORT OF INDEPENDENT EXPENDITURES chedule E)	PAGE 22 OF 25
N	AME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48
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_	Full Name of Payee Kully Hall, LLC	Date of Public Distribution/Dissemination
	Date of Dissemination: 10/12/16  Mailing Address 1932 1st Ave, Sutta 203	10 4 12 1 2016
		Amount
	City State Zip Code	4297.00
	Seattle WA 98101	Transaction ID : SE-951665  Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy Media Production  Category/ Typo	10 14 2016
	Name of Federal Candidate   Support Office	ce Sought: House District: 00
		President Senate State:
	Calendar Year-To-Date Per Election for Office Sought  1721888.30  Dist	bursement For: ☐ Primary ☐ General 6 ☐ 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 Rhede Island Avo., NW	Amount
	Suite 213	· · - · ·
	Cily State Zip Code Washington DC 20036	56930.43 Transaction ID : SE-951666
	Burease of Eurapellium	Date of Disbursement or Obligation
	Media Buy  Categoryi Type  G04	10" 12" 2016
	Name of Federal Candidate Support Office	ice Sought: House District: 00
	Donald J. Trump Oppose	President Senato State:
	Catendar Year-To-Date Per Election for Office Sought  Dist 201	bursement For: Primary General
_		[ ] Other (spouny)
	(a) SUBTOTAL of Itemized Independent Expenditures	61227.43
	(b) SUBTOTAL of Unitemized Independent Expenditures	
		ا سا به دد او او او او او او او او او او او او او
	(c) TOTAL Independent Expenditures	
	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.	nade in cooperation, consultation, or concert ler, or (if the reporting entity is not a political
	Kelly C. Ward	10 14 2016
	Signature Date	10 19 2010

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

ichedule E)	FOR SE OF FORM 24/48
AME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
	C C00000935
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Full Name of Payee The New Media Firm, Inc.	Date of Public Distribution/Dissemination
Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 1730 Rhode Island Ave., NW	Amount
Suite 213	to the transfer the second of
City State Zip Code .  Washington DC 20036	4047.25 Transaction ID : SE-951654
Durane of Funcional Inc.	Date of Disbursement or Obligation
Media Buy Media Production  Category/ Type	10 12 2016
	e Sought: House District: 00
Trump, Donald, J., ,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disb 2016	ursement For: Primary 🗷 General Other (specify) 🕨
Full Name of Payee	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 11150 Fairfax Blvd	and second new world " section-off-section in
Suite 505	Amount
City State Zip Code	121850.00
Fairfax VA 22030	Transaction ID : SE-951660  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  004	10 12 2016
Name of Federal Candidate Support Office	e Sought: House District: 00
Trump, Donald, J., ,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disb 2010	Other (specify)
(a) SUBTOTAL of Itamized Independent Expenditures	125897.25
AN CURTOTAL of Helicaria of Indiana days Francishus	والمناوية والموسد التيسينديا للرساء الرا
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	
Under penalty of perjury I certify that the independent expenditures reported herein were not m with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	
	10 14 2016
Signature	

lmage#	201610189033039655		
24/48	<b>HOUR REPORT</b>	<b>OF INDEPENDENT</b>	<b>EXPENDITURES</b>
(Sche	dule E)		

Schedule E)	PAGE 21 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
Check if 24-hour report 48-hour report New report Amends report filed o	on 10 14 2016
Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination
Mailing Address 1730 Rhode Island Ave., NW Suite 213	Amount
	4047.25  Transaction ID : SE-952372  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production  Category/ Type	10 14 2016
Tanan Basali I	Sought: House District: 00  President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disburg 2016	sement For: Primary   General  Other (specify) ▶
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfex Blvd Suite 505	Amount
City State Zip Code Fairfax VA 22030	121850.00  Transaction ID : SE-952373  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  O04	10 14 Y 2016
1	Sought: House District: 00  President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disbur 2016	sement For:  Primary
(a) SUBTOTAL of Itemized Independent Expenditures	125897.25
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	
Under penalty of perjury I certify that the independent expenditures reported herein 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.	de in cooperation, consultation, or concert or (If the reporting entity is not a political
Word, Kelly, C., [Electronically Filed] Date 10	18 2016
<u></u>	<del></del>

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 3 OF 3
	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
	C c00000935
Check If 24-hour report	port fied on harman in the state of the stat
Full Name of Payee	Date of Public Distribution/Dissemination
Buying Time, LLC Date of Dissemination: 10/11/16	10 11 2016
Mailing Address 650 Massachusetts Avenue, NW	Amount
Suite 210	an in an and an in a mander of an a see a
City State Zip Code	57500.00
Washington DC 20001	Transaction ID : SE-951439 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type 004	4 1 10 11 1 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calondar Year-To-Date Per Election for Office Sought 1459931.62	Disbursement For: Primary
Full Name of Payes	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/12/16	10.20 1 102.01 1 102.01
Mailing Address 11150 Fairfax Blvd	Land Land Land
Suite 505	Amount
City State Zip Code	74632.00
Fairfax VA 22030	Transaction ID : SE-951438  Date of Disbursement or Obligation
Purpose of Expenditure Modia Buy  Category/ Type  Category/ Type	10 11 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Donald J. Trump Qppose	President Senate State:
Calendar Year To-Date Per Efection for Office Sought	Disbursement For: Primary General 2016 Other (specily) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	> 132132.00
(b) SUBTOTAL of Uniternized Independent Expenditures	
(b) SUBTOTAL OF Ormernized indepondent Experiorates	to be a second of the second comments of the
(c) TOTAL Independent Expenditures	170032,00
Under penalty of perjury I certify that the independent expenditures reported herein were with, or at the request or suggestion of, any candidate or authorized committee or agent oparty committee) any political party committee or its agent.	not made in cooperation, consultation, or concert of either, or (if the reporting entity is not a political
Kolly C. Ward	w u , n , o , v v v v v v
Signature Date	0 10 13 2016

	/48 HOUR REPORT OF INDEPENDENT E	XPENDI	TURES		PAGE 50 OF 60
					FOR SE OF FORM 24/48
	ME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER ▼
					C; c00000935
Ch	acck if 24-hour report [] 48-hour report	New repo	ort ( ) Amonds repo	ort filed	ou na na na na na na na na na na na na na
	Full Name of Payee Screen Strategies Media, LLC				Date of Public Distribution/Dissemination
	Date of Dissemination: 10/25/ Mailing Address 11150 Fairfax Blvd	16			10 25 2016
					Amount
	Sulte 505		Zio Code		121850.00
	City Sta Fairfex V.		22030		Transaction IO : SE-952388  Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy		Category/ Type 004		10 1 18 1 2018
	Name of Federal Candidate		Support	Office	Sought: House District: 00
	Donald J. Trump		Oppose	X	President State:
	Calendar Year-To-Date	<del></del>		Disbu	rsement For: Primary K General
	Per Election for Office Sought	,43	69947.93	2016	Other (specify)
	Full Name of Payee Buying Time, LLC				Date of Public Distribution/Dissemination
i	Date of Dissemination: 10/25/ Mailing Address 650 Massachusetts Avenue NW	10			10 25 2016
	650 Massachusetts Avenue, NW Suite 210			Ì	Amount
	City Sta	le	Zip Code		19691.00
	•	С	20001		Transaction ID : SE-953229 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy		Category/ 004	_:	10 24 2018
	Name of Federal Candidate		Support	Office	Sought: House District: 00
	Donald J. Trump		i <b>∑</b> Oppose	X	President Senate State:
	Calendar Year To-Date				rsement For: Primary General
	Per Election for Office Sought	1	4369947.93	2016	☐ Other (specify) ▶
				·	
	(a) SUBTOTAL of Itemized Independent Expenditures			• •	141541.00
	(b) SUBTOTAL of Unitemized Independent Expenditures		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	· •	and the second s
	(c) TOTAL Independent Expenditures			. •	
_	****				The state of the s
	Under penalty of perjury I certify that the independent ex with, or at the request or suggestion of, any candidate or party committee) any political party committee or its agen	authorized			
	Kelly C. Ward			ij	H t t p t v° v v 'c?
	Signature		. Date	1(	25 2016
١.	Signordic				

24/48 HOUR REPORT OF INDEPENDENT ( (Schedule E)	EXPENDIT	URES		PAGE 57 OF 57
		<u> </u>		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC				FEC IDENTIFICATION NUMBER Y
				C c00000935
Check If 24-hour report 48-hour report	New report	Amends repo	ort filled	ou [nem], [ean], [marray]
Full Name of Payee Buying Time, LLC				Date of Public Distribution/Dissemination
Date of Dissemination: 11/0 Malling Address 850 Massachusetts Avenue, NW	1/10			11 01 2016
1			1	Amount
Suite 210				And the second s
		ip Code		7175.00 Transaction ID : SE-954373
Washington		20001		Date of Disbursement or Obligation
Purpose of Expanditure  Media Buy		Category/ 004		10 28 2016
Name of Federal Candidate		Support	Office	Sought: House District: 00
Donald J. Trump		∑ Oppose		President Senate State:
		ICNPF		
Calendar Year-To-Date Per Election for Office Sought	5894	1458.07	2016	rsement For: Primary General  Other (specify) ▶
Full Name of Payee			Ī	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 11/0	1/16	•		المتشنشين لشنقا المتشتما
Mailing Address	1/10		-	11 01 2016
TTTSST BITEM BITE			1	Amount
Suito 505				Laterated by the state of the s
] - '		ip Code	i	74850.00 Transaction ID : SE-954175
Fairfax	VA :	22030		Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004		10 27 7 2018
Name of Federal Candidate		Support	Office	Sought:   House District: 00
Donald J. Trump		Oppose	!	President Senate State:
**************************************		N.2 Obbes		
Calondar Year-To-Date Per Election for Office Sought	ي والمحملة. والمحملة	5894458.07	2016	rsement For: Primary General
(a) SUBTOTAL of Itemized Independent Expenditures			• •	92025.00
(b) SUBTOTAL of Uniternized Independent Expenditures	5	*************	. •	
				A mile Administrator Negative Management of the Administration of
(c) TOTAL Independent Expenditures			. ▶	14333615.05
Under penalty of perjury I certify that the independent of with, or at the request or suggestion of, any candidate of party committee) any political party committee or its age	or authorized c	ported herein were ommittee or agent o	noi ma f siliter,	de In cooperation, consultation, or concert or (II the reporting entity is not a political
Kelly C. Ward			f'u's	to a visite of the contract of
		Oato	11	02 2016
Signature			• •	rains to the Sandformatainer

Image# 201611069037127397 24/48 HOUR REPORT OF INDE	PENDENT EXPENI	DITURES	PAGE	11 OF 12
(Schedule E)				SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			FEC IDENTIF	ICATION NUMBER ¥
DCCC			C c0000	0935
Check II 🗶 24-hour report 🔲 48-hou	r report X New re	port Amends repo	rt filed on	
Full Name of Payee			Date of Public Distri	oution/Dissemination
Screen Strategies Media, I	LLC semination: 11/05/16		11 0	2016
Mailing Address 11150 Fairfax Blvd			Amount	
Suite 505				
City	State	Zip Code		58700.00
Fairfax	· VA	22030	Transaction ID : SE Date of Disbursement	
Purpose of Expenditure Media Buy	,	Category/ Type 004	10 3	TOTAL STORES AND STORES
Name of Federal Candidate	<del></del>	Support	Office Sought: Hou	se District: 00
Trump, Donald, J., ,		X Oppose	President Sen	
Calendar Year-To-Date Per Election for Office Sought		6526208.19	Disbursement For: P 2016 Other (specify)	rimary 🕱 General
Full Name of Payeo Canal Partners Media, LLC Date of Dis	semination: 11/06/16		Date of Public Distri	bution/Dissemination
Mailing Address 25 Whitlock Place			Amount	- Leantenathanathanath
Suite 200				
City Marietta	State GA	Zip Code 30064	Transaction ID: SE- Date of Disbursome	• • • • • •
Purpose of Expenditure Media Buy		Calogory/ 004	1177 0	
Name of Federal Candidate		Support	Office Sought: Hou	use District: 00
Trump, Donald, J., ,		X Oppose	President Ser	nate State:
Calendar Year-To-Date Per Election for Office Sought		6648199.19	Disbursement For: F F 2016 Other (specify)	rimary 🗶 General
(a) SUBTOTAL of Itemized Independen	t Expenditures		. >	66610.00
(b) SUBTOTAL of Uniternized Independ	dent Expenditures	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	•	
(c) TOTAL independent Expenditures	********************************			

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

Ward, Kelly. C., ,			Maria Tar	. 640	٦,	2016
	[Electronically Filed]	Date	11	06	t	2016
Signature			لبساسيا	3	-	

24/48 HOUR REPORT OF INDEP	ENDENT EXPEND	ITURES		
(Schedule E)				PAGE 19 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			FEC	IDENTIFICATION NUMBER V
DCCC			C	C00000935
Check if 24-hour report	report Now rep	orl K Amends repo	rt filed on 10	14 2016
Full Name of Payee Raiston Lapp Media, LLC			Date of Pub	lic Distribution/Dissemination
Date of Disse	mination: 10/14/16		10	14 2016
Mailing Address 1054 31st Street, NW			Amount	
Suite 430		71-0-4-		4000.74
City Washington	State DC	Zip Code 20007		12260.71 ID : SE-951677 bursement or Obligation
Purpose of Expenditure Media Production		Category/ 004	10	14 2016
Name of Federal Candidate	<del></del>	Support	Office Sought:	House District: 23
Hurd, William, , ,		X Oppose	President	Senate State: TX
Calendar Year-To-Date			Disbursement For:	Primary X General
Per Election for Office Sought		1648833.65	2016 Other (	specify) >
Full Name of Payee			Date of Put	olic Distribution/Dissemination
Buying Time, LLC  Date of Disse	emination: 10/14/16		10	14 2016
Mailing Address 650 Massachusetts A	venue, NW		Amount	landani landaningal
Suite 210			h	<del></del>
City	State	Zip Code	المسيسال المسيسال	53000.00
Washington	DC	20001		ID : SE-952374 bursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10	13 2016
Name of Federal Candidate	<del></del>	Support	Office Sought:	House District: 00
Trump, Donald, J., ,		X Oppose	× President	Senate State:
Calendar Year-To-Date Por Election for Office Sought		1919459.68	Disbursement For:	ب ، ب
	Recombinational International In-		Ciner (	specify) 🕨
(a) SUBTOTAL of Itemized Independent	Expenditures			65260.71
(b) SUBTOTAL of Unitemized Independe	nt Expenditures	***************************************		
}	•		ingen kommissen programmingen	
(c) TOTAL Independent Expenditures		***************************************	·	12
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	s reported herein were d committee or agent o	not made in cooper of either, or (if the re	ration, consultation, or concert sporting entity is not a political
Ward, Kelly, C., .	lElectro	nically Filed  Date	10 18	2016
Signature		Jaie	السنتسا است	المستقدا

Image# 201610199033071490 24/48 HOUR REPORT OF INDEPENDENT EX	(PENDITURES	
(Schedule E)		PAGE 52 OF 52 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	t filed on " " " " " " " " " " " " " " " " " "
Full Name of Payee		Date of Public Distribution/Dissemination
The New Media Firm, Inc. Date of Dissemination: 10/18/1	R	10 18 2016
Mailing Address 1730 Rhode Island Ave., NW		
Suite 213		Amount
City State	Zip Code	3407.87
Washington DC	20036	Transaction ID : SE-952382 Date of Disbursement or Obligation
Purpose of Expenditure	Category/	Man , Loud , Lastatura
Media Buy Media Production	Type	10 18 2016
Name of Federal Candidate	Support	Office Sought: House District: 00
Trump, Donald, J., .	× Oppose	★ President    Senate    State:
Out of the West Tenne		Disbursement For: Primary X General
Calendar Year-To-Date Per Election for Office Sought	2613000.20	2016 Other (specify)
Full Name of Payee		Date of Public Distribution/Dissemination
Buying Time, LLC		Bureal , Buscon , Back-said
Date of Dissemination: 10/18/1	6	10 18 2016
Mailing Address 650 Massachusetts Avenue, NW		Amount
Suite 210		
City	e Zip Codo	83829.00
Washington	20001	Transaction ID : SE-952073 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	Calegory/ 004	المديدي العنوا المكتب
, media buy	Туре	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		Disbursement For: Primary X General
Per Election for Office Sought	2613000.20	2016 Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures		87236,87
(a) Cook of the contract interpolation Exponential		
(b) SUBTOTAL of Unitemized Independent Expenditures		
(a) 55576142 of Grindings indepolicing Experionalist	*	
(c) TOTAL Independent Expenditures		44452400 00
(c) Total independent Experience		11152409.36
Under penalty of perjury I certify that the independent exp with, or at the request or suggestion of, any candidate or party committee) any political party committee or its agent.	authorized committee or agent o	not made in cooperation, consultation, or concert if either, or (if the reporting entity is not a political
Ward, Kelly, C., ,	Electronically Pile it	المعمقمعما ، المعمة ، المعمدما
Signature	[Electronically Filed] Date	10 19 2016

NAME OF COMMITTEE (In Full)  DCCC  FEC IDENTIFICATION NUMBER  C: C00000935  Check if X 24-hour report 48-hour report X New report Amends report filed on 4	
Check if 24-hour report 48-hour report New report Amends report filed on 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	SER V
Full Name of Payers Screen Strategies Media, LLC Date of Dissomination: 10/25/16 Date of Dissomination: 10/25/16	Y Y
Screen Strategies Media, LLC Date of Dissomination: 10/25/16 10 25 2010	أسبيت
1 10 1 20 1 20 1	
Malling Address 11150 Fairfax Blvd  Suite 505  Amount	- 4 - 4
City State Zip Code 6432 Fairfax VA 22030 Transaction ID ; SE-953184	6.00
Purpose of Expenditure . Category/	1.2 4 2
Modia Buy  Type: 004  10 21 201  Namo of Federal Candidate  Support Office Sought: House District:	00
Donald J. Trump Oppose President Senate State:	
Calendar Year-To-Date Por Election for Office Sought  4369947.93  Disbursement For: ☐ Primary ☐ G	eneral
Full Name of Payeo  Buying Time, LLC  Oate of Dissemination: 10/25/16  Date of Public Distribution/Dissemination  Oate of Dissemination: 10/25/16	ullon v rvry
Mailing Address 650 Massachusatts Avenue, NW Amount	
City State Zip Code 62488 Washington DC 20001 Transaction ID: SE-953185	.00
Purpose of Expanditure  Media Buy  Category/ Type  Category/ Type  Out Type Type Type Type Type Type Type Type	
Name of Federal Candidate Support Office Sought: House District:  Donald J. Trump  Oppose President Senate State:	00
7	eneral
(a) SUBTOTAL of (temized independent Expenditures	
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expanditures	]
Under penalty of portury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or cowith, or at the request or suggestion of, any conditate or suthorized committee or agent of either, or (if the reporting entity is not a poparty committee) any political party committee or its agent.	ncert lilical
Kelly C. Ward  Date 10 25 2016  Signature	