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December 22, 2016

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

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

Dear Mr. Jordan:

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

INTRODUCTION

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

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

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

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

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

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

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

^{1 11} C.F.R. § 106.1(a)(1).

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

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

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

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

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

FACTS

The DCCC is the House campaign committee of the Democratic Party.⁶ Its principal mission is to support Democratic congressional candidates and other candidates around the country. In 2016, as before, a key part of the DCCC's activities involved financing television advertisements. Under Commission rules, the legal treatment of these advertisements varies by content—for example, whether they identify clearly identified candidates and, if so, how many; whether they expressly advocate the candidates' election or defeat; and whether they are coordinated with those candidates. The DCCC has had a long history of not simply making coordinated expenditures in support of House campaigns, but using communications to promote the interests of the Democratic Party as a whole.⁷

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

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

⁵ See FEC MUR 6916, First General Counsel's Report (Oct. 22, 2015).

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

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

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

- Some of the advertisements expressly advocated the defeat of both the Republican House candidate and Trump. (e.g., "Vote No on [Republican congressional candidate] and Donald Trump"). In these cases, the DCCC paid for and reported the portion of the advertisement attributable to Trump as an independent expenditure opposing him. The remainder was either paid entirely by the Democratic congressional campaign, or split between the campaign and the DCCC, with the DCCC treating its share of the remainder as a coordinated expenditure. Advertisements that included express advocacy against Donald Trump are discussed in MURs 7169, 7170, 7171, 7174, 7176, and 7182. 10
- Other ads mentioned both House candidates and Donald Trump, but did not expressly advocate Trump's defeat. Rather, these ads focused on Trump's positions on key issues like national security, immigration, women's health, or gun control and his actions causing unrest and harm to the country. In these cases, the portion of the advertisements that concerned congressional candidates was either paid in whole by the Democratic House campaign, or split between the campaign and the DCCC using funds available under the coordinated party expenditure limits. 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,

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

https://www.youtube.com/watch?v=7KxcnucjChU&feature=youtu.be. The advertisement in MUR 7178 can be found here: https://www.youtube.com/watch?v=HIxNUxf-t80. The advertisement in MUR 7179 can be found here: https://www.youtube.com/watch?v=OpdllznhrF4. The advertisement in MUR 7188 can be found here: https://www.youtube.com/watch?v=epFwW3WyOWo. For the advertisement in MUR 7177, the Colorado Democratic Party similarly split the costs of the advertisement with Carroll for Colorado on a time/space basis.

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

See Exhibit B (relevant pages of FEC reports).

The advertisement in MUR 7169 can be found here: https://www.youtube.com/watch?v=7mb2DsowG00. The advertisement in MUR 7170 can be found here: https://www.youtube.com/watch?v=ulkmwN7ivMU. The advertisement in MUR 7171 can be found here: https://www.youtube.com/watch?v=e-4kBjw8r-U. The advertisement in MUR 7176 can be found here: https://www.youtube.com/watch?v=WCx3ObETyrE. The advertisement in MUR 7182 can be found here: https://www.youtube.com/watch?v=il8196BhvWg&feature=youtu.be.

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¹¹ 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. 13

All of the advertisements discussed in the Complaints were conceived and executed by the DCCC independently of HFA or its agents. 14 Because the ads would refer to Trump, the staff and campaigns were instructed not to coordinate them with HFA or its agents. 15 The Complaints make no specific allegation of coordination whatsoever, and the declarations accompanying this response demonstrate the absence of any request, suggestion, assent, substantial discussion or material involvement. 16 The declarations demonstrate also that there was no coordination through any common vendor, former employee or independent contractor. 17

LEGAL ANALYSIS

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

11 C.F.R. § 106.1(a) provides that "expenditures, including in-kind contributions, independent expenditures, and coordinated expenditures made on behalf of more than one clearly identified Federal candidate shall be attributed to each such candidate according to the benefit reasonably expected to be derived."18 For a television ad, the regulation is explicit about how to make this attribution; it "shall be determined by the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates."19 The Commission has repeatedly and consistently applied this regulation when evaluating communications that refer to multiple candidates. 20 For example, when an advertisement identifies candidates in multiple races, the expenditure is attributed based on the time/space dedicated to each race (e.g., the time dedicated to advocating a congressional candidate and her opponent would be attributed separately from the time spent advocating for a presidential candidate).21 The portions of the broadcast communication that is dedicated to the legally

¹³ The advertisement in MUR 7173 can be found here: https://www.youtube.com/watch?v=RriiljNAe-I. The advertisement in MUR 7187 can be found here: https://www.youtube.com/watch?v=8DN@EgLEECA. See Exhibit B.

14 See Exhibit A.

¹⁵ Id.

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

¹⁷ The vast majority of vendors working on the ads at issue in these matters did not work for HFA. Two vendors who did work on two different advertisements also did work for HFA but did not use any non-public information about HFA's plans, projects, activities, or needs in working on the advertisement. See Exhibit C. 18 11 C.F.R. § 106.1(a).

²⁰ See FEC Adv. Op. 2010-10 (NRL PAC); FEC Adv. Op. 2004-37 (Waters) ("attribution shall be determined by the proportion of space devoted to each candidate") (citing 11 C.F.R. § 106.1(a)(1)). ²¹ FEC Adv. Op. 2010-10 (NRL PAC).

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

In attributing the cost of a communication among multiple candidates, the Commission does not look to whether or not the segment associated with a particular candidate contains express advocacy. For example, in Advisory Opinion 2004-01, issued to Bush-Chency '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."²³ 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. 24 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).25

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

²² Specifically, the Commission has advised that the disclaimer component of the communication should be attributed among the candidates or purposes "in the same proportion as the time or space" devoted to each race or purpose. FEC Adv. Op. 2010-10 (NRL PAC) at 6; see also FEC Adv. Op. 2007-09 (Kerry-Edwards) (permitting disclaimer to be attributed among multiple purposes). For instance, in NRL PAC, the FEC stated that, where 16 seconds of a 30-second advertisement are devoted to advocating for a presidential candidate, 8 seconds are devoted to advocating against a Senate candidate, and 6 seconds are devoted to a disclaimer, two-thirds of the expenditure should be reported as having been made in support of the presidential candidate and one-third should be reported as having been made in opposition to the Senate candidate. FEC Adv. Op. 2010-10 at 6 n.7. In Kerry-Edwards, the Commission found that the portion of broadcasting costs incurred by the Kerry-Edwards Campaign in complying with disclaimer requirements were expenses that may be paid for with legal funds. See FEC Adv. Op. 2007-09. ²³ FEC Adv. Op. 2004-01 (Bush/Kerr).

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

25 FEC Adv. Op. 2010-10 (NRL PAC).

²⁶ FEC Adv. Op. 2004-29 (Akin) at 6.

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

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

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

B. Respondents attributed the advertisements correctly.

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

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

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

³⁰ FEC Adv. Op. 2010-10 (NRL PAC).

Take, for example, the advertisement sponsored by the DCCC and Mowrer for Iowa at issue in MUR 7174.31 The advertisement contains express advocacy against Representative David Young and Donald Trump. The advertisement criticizes the positions of both Trump and Young and ends by saying, "Vote No on Donald Trump and David Young." The ad starts with approximately 5 seconds concerning Donald Trump and is followed by 4 seconds attributable to the House race, 5 seconds attributable to Trump, 4 seconds attributable to the House race, 3 seconds attributable to Trump, 5 seconds attributable to the House race, and finally 4 seconds containing the legally required disclaimer. The first 26 seconds of the advertisement were equally divided between the congressional race and Donald Trump and the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion. The advertisement was attributed 50% to the Mowrer campaign and 50% to Donald Trump.

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

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

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

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

³² Colleen Deacon, *Unsettled*, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0.
³³ See Exhibit B.

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

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

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

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

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

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

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

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

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

¹⁵ See Exhibit B.

^{36 /}d.

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

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

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

A communication expressly advocates if it: uses phrases such as "vote for the President," "Smith for Congress," or "Bill McKay in '94," or uses campaign slogans or individual words, which in context "can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidates," such as a message saying "Nixon's the One," or "Carter '76," or when taken as a whole and with limited reference to external events, "could only be interpreted by a reasonable person as containing advocacy of the election or defeat" of a candidate because the "electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning" such that reasonable minds "could not differ as to whether it encourages actions to elect or defeat" the candidate. 41 A message constitutes express advocacy "only if it contains a clear call to a specific electoral

³⁷ 11 C.F.R. § 100.16.

³⁸ Dangerous for PA Women, YouTube (Oct. 20, 2016) at :20 ("Say No To Donald Trump & Brian Fitzpatrick"), https://www.youtube.com/watch?v=7imb2DsowG00; Ruben Kihuen for Congress, Our Values, YouTube (Oct. 18, 2016) at :23 ("Vote NO on Cresent Hardy and Donald Trump"),

https://www.youtube.com/watch?v=ulkmwN7ivMU; Nelson for Wisconsin, No, YouTube (Oct. 10, 2016) at :25 ("Mike Gallagher says we still have to support Donald Trump. No, we don't, we don't have to support Mike Gallagher either"), https://www.youtube.com/watch?v=LS-gU95vm9U; Jim Mowrer, Now We Understand,

YouTube (Oct. 19, 2016) at :28 ("Vote No on Donald Trump and David Young"), https://www.youtube.com/watch?v=g_4kBjw8r-U; Suzanna Shkreli for Congress, Brags, YouTube (Oct. 14, 2016) 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=i18196BhvWg&feature=youtu.be.

39 See Exhibit D (excerpts from relevant independent expenditure reports). There would have been no basis to consider the portions of the advertisements attributable to Trump as coordinated communications with the House campaigns. See Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 431 (Jan. 3, 2003) (conduct standard cannot "be satisfied without some link between the request or suggestion and the candidate or political party who is, or that is, clearly identified in the communication"). ⁴⁰ See, e.g., FEC Adv. Op. 1985-14 (DCCC).

⁴¹ 11 C.F.R. § 100.22.

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

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

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

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

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

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

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

KATKO: "I absolutely will support."

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

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

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

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

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

[DISCLAIMER].44

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

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

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

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

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

TRUMP: We're going to build a wall.

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

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

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

WILL HURD: A wall absolutely makes sense.

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

[DISCLAIMER].45

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

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

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

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

Instead, the Complaints make the conclusory allegation that the advertisements were coordinated with HFA. However, such pure speculation cannot support a finding of a reason to believe. The Commission may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Act. 48 For claims of coordination, the Commission requires an even stronger showing: that Complainant provide "probative information of coordination." The Commission has also made clear that "unwarranted legal conclusions [drawn] from asserted facts" or "mere speculation" are not sufficient to find reason to believe that Respondents violated the Act through impermissible coordination.⁵⁰ 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.⁵¹ The declaration of Michael Ian Russell, the DCCC's Deputy Executive Director and Political Director, is especially important.⁵² Mr. Russell makes clear that he supervised the communications campaign at issue in these Complaints; that it did not involve any request, suggestion or assent from HFA; that he instructed those participating in the program to refrain from any

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

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

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

⁵⁰ FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000).

See Exhibits A and C.

See Exhibits A.

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

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

CONCLUSION

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

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

Very truly yours,

Marc E. Elias

Brian G. Svoboda

Graham M. Wilson

Rachel L. Jacobs

Enclosure

Counsel to:

DCCC

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

⁵³ Id.

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

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

Exhibit A

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF MICHAEL IAN RUSSELL

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 2/4 day of December, 2016.

Michael Ian Russell

Exhibit B

Image# 201612089039916605

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

PAGÉ 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 IX YES NO Mailing Addross If YES, name the designating committee: 430 South Capitol Street, SE Democratic National Committee & 2nd Floor State ZIP Cede Pennsylvania Democratic Party Washington 20003-4024 DC Full Name (Last, First, Middle Initial) of Each Payee Memo item Purpose of Expenditure Media Services Mundy Katowitz Media, Inc. Category/ Typc Malling Address 1322 G Stroot, SE Date City State Zip Codo 10 2016 Washington DC 20003 Name of Fuderal Candidate Supported Office Sought: House State: PA Amount 16 Hartman, Christina, , , Sonate District: 96070.00 Presidential Aggregate General Election 96070.00 Exponditure for this Candidate Transaction ID: SF-953178 Full Name (Last, First, Middle Initial) of Each Payce Memo Item Purpose of Expenditure Category/ Mailing Address Туре Date Clty State Zip Code Name of Federal Candidate Supported Office Sought: House State: Amount Senate District: Presidential Aggregate General Election Expenditure for this Candidate Purpose of Expenditure Full Name (Last, First, Micidlo Initial) of Each Payee ; ! Merno Item Category/ Mailing Address Type Date Zip Code Stale Name of Foderal Candidate Supported Office Sought: State: House Amount Sonale District: Prosidential Aggregate General Election Expenditure for this Candidate 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)

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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)

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Exhibit C

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF MAURA JOHNSON - MUR 7179

- 1, Maura Johnson, do declare and state as follows:
 - During the 2016 election, as a Mcdia Supervisor at GMMB, Inc. ("GMMB"), I provided
 media buying services for Ralston Lapp Media, the consultant working with Stephanie
 Murphy for Congress. Through that position, I am familiar with the matters discussed
 herein.
 - 2. During that time, I worked with DCCC and Stephanie Murphy for Congress to distribute an advertisement discussed in the complaint in FEC Matter Under Review 7179 (the "Advertisement"). To the best of my knowledge and belief, I was the only employee of GMMB that worked on the Advertisement.
 - 3. GMMB worked for Hillary for America ("HFA") during the 2016 election cycle.
 - 4. To the best of my knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
 - 5. To the best of my knowledge, neither l, 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.
- 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 **22.44** day of December, 2016.

David Dixo

Richard

Exhibit D

	/48 HOUR REPORT OF INDEPENDENT EXPENDITURES		
Sc	chedule E)		PAGE 9 OF 9 FOR SE OF FORM 24/48
	ME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER V
D	OCCC		C C00000935
Ch	eck if [24-hour report X 48-hour report X New report X Amends repo	ort filed	d on \$
٦	Full Name of Payee		Oate of Public Distribution/Dissemination
	Old Towne Media Date of Dissemination: 10/19/16		10 19 2016
1	Mailing Address 4507 Penwood Dr		Amount
	Cliy State Zip Code Alexandria VA 22310		48000.00 Transaction ID : SE-952383
	Purpose of Expenditure Media Buy Catogory/ Type 004		Date of Disbursement or Obligation
Ì	Nume of Federal Candidate	Office	e Sought: House District: 00
	Donald J. Trump Support Oppose	l	President Sanate State:
Ì	Calendar Year-To-Date	Disbu	ursement For: Primary X General
ł	Per Election for Offico Sought] 2742321.20	2016	Other (specify)
	Full Name of Payee AL Media, LLC		Date of Public Distribution/Dissemination
١	Date of Dissemination: 10/19/16		10 19 2016
1	Mailing Address 222 West Ontario West-	}	Amount
	Suite 600		پېدىر د نور ، دېښدود
	City State Zip Code Chicago IL 60654	}	81321.00 j
ł	Dunca of Connections	=;	Date of Disbursement or Obligation
	Media Buy Contegory/ Type Out Type	_	10 14 2016
1	Name of Federal Candidate Support	Office	e Sought: House District: 00
	Oonald J. Trump Oppose	N N	President Senate State:
	Calendar Year To-Date Per Election for Office Sought 2742321.20	Disbu 2016	ursement For: Primary General Other (specify) ▶
_			
((a) SUBTOTAL of Itemized Independent Expenditures	• •	129321.00
,	(b) SUBTOTAL of Unitemized Independent Expenditures		The second section and
١	by doctorat of dimension independent dispersion in the control of		التماكسة مسترات الأرامة
((c) TOTAL Independent Expenditures	•	273146,39
W	Under penalty of perjury I cortify that the independent expenditures reported horein were 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.	nol ma	ade in cooperation, consultation, or concert r, or (If the reporting entity is not a political
	Kelly C. Ward	1 ^u ,	0 21 2016
	Signature	i "	2 2 1 2 2010

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES							
(Schedule E)	FOR SE OF FORM 24/48						
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER Y						
DCCC	C c00000935						
Check if 🔀 24-hour report 🔲 48-hour report 🎺 🔀 New report 📗 Amends report filed o	on [4 * 4 * 7 * 6 * 6 * 7 * 7 * 7 * 7 * 7 * 7 * 7						
Screen Strategies Media, LLC	Date of Public Distribution/Dissemination						
Date of Dissemination: 10/24/16 Muiling Address 11150 Fairlax Bivd	10 24 2016						
Suite 505	Amount						
City State Zip Code	45000.00						
Fairfax VA 22030	Transaction ID: SE-952072 Date of Disbursement or Obligation						
Purpose of Expenditure Media 8uy Category/ Type: 004	10 17 2016						
Name of Federal Candidate Support Office S	Sought: House District: 00						
Opposo Opposo	President Senste State:						
Calendar Year-To-Date Per Election for Office Sought Disburs 2016	sement For: ☐ Primary ☐ General ☐ Other (spocify) ▶						
Full Name of Payee	Date of Public Distribution/Dissemination						
AL Media LLC	10 24 2016						
Oate of Dissemination: 10/24/16 Mailing Address 222 W Ontario St	10 24 2016						
- ZZZ VY OTNOTIO SV	Amount						
Suite 600 City State Zip Code	131250.00						
Chicago IL 60654	ransaction ID : SE-953187 Date of Disbursement or Obligation						
Purpose of Expenditure Media Buy Category/ Type 004	10 21 2016						
Name of Federal Candidate Support Office S	Sought: House District: 00						
Donald J. Trump Oppose X Oppose	President						
Per Election for Office Sounds 3653174.61 2018	sement For: Primary General						
An antimogram of a such market process of the such market process and a such market process and	Other (specify) ▶						
(a) SUBTOTAL of Itemized Independent Expenditures	176250.00						
(b) SUBTOTAL of Unitemized Independent Expenditures	واستهامت همت موسال والمنهدان والمانوا المهامات الدالم						
(c) TOTAL Independent Expenditures	The state of the s						
Under penalty of perjury I certify that the Independent expanditures reported herein were not made with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or party committee) any political party committee or its agent.							
Kelly C. Ward Date 10	25 2016						
- ज्युन्तवसम्	· · · — - · ·						

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 51 OF 60
(Schedule E)	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 filed on	1. 1.1. 1.0.4.9 1 1. 1.0.4.0.4.0.4.0.4.0.4.0.4.0.4.0.4.0.4.0.
AL Media LLC	of Public Distribution/Dissemination
Date of Dissemination: 10/25/16 Mailing Address 222 W Ontario St	10 25 2016
Suite 600	uni
City Slato Zip Code	900.00
Date	saction ID : SE-953228 of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 1999	10 24 2016
Name of Federal Candidate Soug	ht: House District: 00
Donald J. Trump Oppose Presid	tent Senate State:
Calendar Year-To-Date Per Election for Office Sought 4369947.93 2016	nt For: ☐ Primary ☒ General Other (specify) ▶
Canal Partners Media, LLC	of Public Distribution/Dissemination
Mailing Address 25 Whitlock Place	i en ' : A en l'amben : ' en e-
Suite 200	a i i i i i i i i i i i i i i i i i i i
City State Zip Code	184082.00 action ID : SE-952497
Dato	of Diabursement or Obligation
Purpose of Expenditure Media Buy Calegory/ Type Calegory/ Type	10 19 2016
Name of Federal Candidate Support Office Sough	ht: House District: 00
Donald J. Trump X Oppose X Presid	lent Senate State:
Calendar Year-To-Date Por Election for Office Sought Disbursement 2016	nt For: Primary X General Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	193082.00
(b) SUBTOTAL of Uniternized Independent Expenditures	A CONTRACTOR OF THE STATE OF TH
	to be and any assessment of the state of the
(c) TOTAL Independent Expenditures	La La Matta spania e La Marcia i ma
Under penalty of perjury i certify that the independent expenditures reported herein were not made in with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if party committee) any political party committee or its agent.	cooperation, consultation, or concert the reporting entity is not a political
Kelly C. Word Date 10	25 2016
Signature	

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E) PAGE 23 OF 23								
(Schedule E)	FOR SE OF FORM 24/48							
NAME OF COMMITTEE (In Full)								
DCCC	C C00000935							
Check if 24-hour report 48-hour report New report Amends report (III	ed on i w u i i o ran i para a range dange							
Full Name of Payer Moore Campaigns, LLC	Date of Public Distribution/Dissemination							
Mailing Address 447 Irving St, NW	10 28 2016 Amount							
	الله المحمد مالات المحمد المحم							
City State Zip Code Washington DC 20010	Transaction ID : SE-954234 Dulo of Disbursement or Obligation							
Purpose of Expenditure Mail Services Category Typo Typo	10 27 2016							
Name of Federal Candidate Support Offi	ice Sought: House District; 00							
No.	President Senate State:							
	bursament For: Primary General							
Per Election for Office Sought 4593586.81 201								
Full Name of Payee	Date of Public Distribution/Dissemination							
AL Media LLC	10 28 2016							
Mailing Address 222 W Ontario St								
Suite 600	Amount							
City State Zip Code	30525.00							
Chicago IL 60654	Transaction ID : SE-953928 Date of Disbursement or Obligation							
Purpose of Exponditure Media Buy Category/ Type Out	10 28 2016							
Name of Federal Candidate . Support Off	ice Sought: House District: 00							
Donald J. Trump Oppose	President Sonate State:							
Calendar Year-To-Date Per Election for Office Sought Dis 201	bursement For: A Primary A General 16							
) Onto (apectary)							
(a) SUBTOTAL of Itemized Independent Expenditures	34997.36							
(b) SUBTOTAL of Uniternized Independent Expenditures								
(c) TOTAL Independent Expenditures	1588663.18							
Under panalty of perjury I cortify that the independent expenditures reported herein were not r with, or at the request or suggestion of, any candidate or authorized committee or agent of eith party committee) any political party committee or its agent.	made in cooperation, consultation, or concert nor, or (if the reporting entity is not a political							
Kelly C. Ward	Common and the state of the sta							
Signature Date (10 29 2016							

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	C c00000935							
Check if 24-hour report 48-hour report New report Amends report filed	on hard a gray and a g							
Full Name of Payee Adelstein & Associates LLC	Date of Public Distribution/Dissemination							
Date of Dissemination: 10/31/16 Mailing Address 222 West Ontario Street, Suite 600	10 31 2016 Amount							
City State Zip Code Chicago IL 60654	80000.00 Transaction ID : SE-954371							
Purpose of Expenditure Category/ Type 004	Date of Disbursement or Obligation 10 28 2016							
Name of Federal Candidate Support Office	Sought: House District: 00							
Trump Docald I	President Senate State:							
Calendar Year-To-Date Per Election for Office Sought Disbut 2016	rsement For: Primary General Othor (specify)							
Full Name of Payee	Date of Public Distribution/Dissemination							
Adelstein & Associates LLC Date of Dissemination: 10/31/16	10 31 2016							
Mailing Address 222 West Ontario Street, Suite 600	Amount							
City State Zip Code	67387,50							
Chicago IL 60654	Transaction ID : SE-954372 Date of Disbursement or Obligation							
Purpose of Expenditure Media Buy Category/ Typo 004	10 28 2016							
Name of Federal Candidate Support Office	Sought: House District: 00							
Trump, Donald, J., ,	President Senate State:							
Calendar Year-To-Date Per Election for Office Sought Disbut 2016	rsement For: Primary General Other (specify) ▶							
(a) SUBTOTAL of Itemized Independent Expenditures	147387.50							
(b) SUBTOTAL of Unitemized Independent 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 [Electronically Filed] Date 1	31 2016							
Signature	nort Samelerson benefiteenbereit							

24/48 HOUR REPORT OF INDEPENDEN (Schedule E)	IT EXPEN	IDITURES		PAGE 51 OF 52 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			FEC	DENTIFICATION NUMBER V
			C	C00000935
Check if 24-hour report 48-hour report	∑ New	report Amends repo	ort filed on	* h • * * * . 4:
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 1	10/18/16		Date of Pu	blic Olstribution/Dissemination
Mailing Address 11150 Fairfax Blvd				10 50.0
Suite 505			Arnount	
City	State	Zip Code		134898.50
Fairlax	VA	22030	Transactio Date of Dis	on ID : SE-952377 Sbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10	2016
Name of Federal Candidate		Support	Office Sought;	House District: 00
Donald J. Trump		🔀 Oppose	President	Table 1
Calendar Year-To-Date Per Election for Office Sought	,	2613000.20	Disbursement For: 2016 Other (: Primary X General
Full Name of Payee			: Date of Pu	blic Distribution/Dissemination
Kully Hall, LLC Date of Dissemination: 1	10/19/16			18 2016
Mailing Address 1932 1st Avo, Suite 203	W 10110			10 2010
1000 101/110/ 2010 200		•	Amouni	
City	State	Zip Code		6225.00
Scattle	WA	98101		n ID: SE-952379 sbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type	1022	18 2016
Name of Foderal Candidate		Support	Office Sought:	House District: 00 ·
Donald J. Trump		X: Oppose	> President	Senate State:
Calendar Year-To-Date Per Election for Office Sought		2613000.20	Disbursement For: 2016 Other (: Primary X General
(a) SUBTOTAL of Itemized Independent Expenditure	?S		; >	141123.50
(b) SUBTOTAL of Uniternized Independent Expendit	ures		• •	
(c) TOTAL Independent Expenditures		**************************************	•	
Under penalty of perfury I cortify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ite or authoriz	es reported herein were ted committee or agent o	not made in cooper f either, or (if the re	ration, consultation, or concert porting entity is not a political
Kelly C. Ward			· * * =	
Signature	The housement	Date	10 19	2016

24/48 HOUR REPORT OF INDEPENDEN (Schedule E)	IT EXPE	NDITURES			PAGE 48	OF 60
NAME OF COMMITTEE (In Full)		·····		FEC II		N NUMBER ▼
DCCC				1,50		N NOMBER V
				C	C00000935	
				, , , ,	D 1' '	~ y y y.
Check if 24-hour report 48-hour report	X: Ne	w report , _! Amends rep	oorl filed	f on	-	•
Full Name of Payer				Date of Publi	c Distribution/(Nissamination
Screen Strategies Media, LLC				12 N		// / /
Date of Dissemination:	10/24/16			10	24	2016
Mailing Address 11150 Fairfax Blvd				Amount		
Suita 505						
City .	State	Zip Code			,	45000.00
Fairfax	VA	22030			ID : SE-952072 ursement or Ol	
Purpose of Expanditure		Calegory/ no.				anderioti
Media Buy		Type 004			17	2016
Name of Federal Candidate		Support	Office	e Sought: .	House D	district: 00
Donald J. Trump		X Oppose	1	President .		
Calendar Year-To-Date				ursement For:		
Per Election for Office Sought	,	3653174-61	2016			
	'	<u> </u>	<u> </u>		eaily) 🕨	
Full Name of Payee AL Media LLC					c Distribution/C	
Date of Dissemination:	10/24/16			້າວ້	24	2016
Mailing Address 222 W Ontario St				A		
Suite 600				Amouni		
City	State	Zip Code				131250.00
Chicago	II.	60654		Transaction II		
Purpose of Expenditure	_			Date of Disbu		-
Media Buy		Category/ 004		10	21	2016
			, ,			
Name of Federal Candidate		Support	}			istrict: 00
Donald J. Trump		X. Oppose	1 X	President	Senate	State:
Calendar Year-To-Date			Disb	ursement For:	Primary	General
Per Election for Office Sought	;	3653174.61	2016	Cthor (sp		
	····		<u> </u>			
(-) CURTOVAL of Bossland Indonesia Compadition		•		•		76350.00
(a) SUBTOTAL of Itemized Independent Expenditure	J\$.,.i		▶		, '	76250.00
				•		
(b) SUBTOTAL of Uniternized Independent Expendit	ures	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	▶	•		•
(c) TOTAL Independent Expanditures			··· ►		,	,
Under penalty of perjury I certify that the independent with, or at the request or suggestion of, any candidate.	ent expendi	tures reported herein were	on ion	ade in cooperat	ion, consultatio	on, or concert
perty committee) any political party committee or its				a an grane rape	g =, 10	
Kette C. Ward	•				i	,
		Date	e 1	0 25	2016	•
Signature						

	B HOUR REPORT OF INDEPEN Edule E)	IDENT EXPEN	DITURES		PAGE 52 OF 60 FOR SE OF FORM 24/48
NAME	OF COMMITTEE (In Full)			l sisa	
DC				FEG	IDENTIFICATION NUMBER *
				C	C00000935
Check	if 24-hour report 48-hour repo	on X New re	port Amends repo	ort filed on	n c 4 A 4 4
FL	il Name of Payer	• • • • • • • • • • • • • • • • • • • •		Date of Pub	plic Distribution/Olssemination
	Screen Strategies Media, LLC	ation: 10/25/16		1	25 2016
М	ailing Address 11150 Fairfax Blvd			Amount	
- 1	Suite 505			Amount	
G	ły	State	Zip Code		64326.00
F	aidax	VA	22030		n ID : SE-953184 bursement or Obligation
	irpose of Expenditure ledia Buy		Category/ Type 004		21 2016
Na Na	ame of Federal Candidate		Support	Office Sought:	House District: 00
١٥	onald J. Trump		(Coppose	President	
	Calendar Year-To-Date Por Election for Office Sought	, ,	4369947.93	2016 Other (s	Primary ⊠ General
Fi	ult Name of Payee .			Date of Pub	dic Distribution/Dissemination
E	Buying Time, LLC Date of Dissemin	ation: 10/25/16		10	25 2016
M	ailing Address 650 Massachusetts Aven		~ 		25 2016
	Suite 210	Je, 1444		Amount	•
- C	ly	State	Zip Code		62488.00
	Vashington	DC	20001	Transaction Date of Disi	; ID : SE-953185 bursament or Obligation
	prose of Expenditure redia Buy	•	Category/ 004	"10"	21 2016
N	ame of Federal Candidaté		Support	Office Sought:	House District: 00
٥	onald J. Trump	-	X Oppose	:X President	Senato State:
	Calendar Year-To-Date Per Election for Office Sought		4369947.93	Disbursement For: 2016 Other (:	Primary
	SUBTOTAL of Itemized Independent Expo				126814.00
(c)	TOTAL Independent Expenditures	# 		· • .	
with	ler penalty of perjury I certify that the ind , or at the request or suggestion of, any of y committee) any political party committee	candidate or authorize			
	Kelly C Word				
1	Signature	a North	. Oase	10 25	2016

24/48 HOUR REPORT OF INDEPENDENT	EXPEND	TURES			(1) O =	
(Schedule E)				•	PAGE 8	OF 8 F FORM 24/48
NAME OF COMMITTEE (In Full)				l sec i		ON NUMBER Y
DCCC				_		ON NUMBER Y
				1 C	C00000935	
				بــــــــــــــــــــــــــــــــــــ	. , ,	· · · · ·
Check if :X: 24-hour report 48-hour report	X Now rep	ort Arnands repo	ort filed	on		•
Full Name of Payee			·	Coto of Cubi	ie Distribution	/Dissemination
Screen Strategies Media, LLC	•		- 1	Date of Pud		Oissemnation
Date of Dissemination: 10	/31/16			້ 10	31	2016
Mailing Address 11150 Fairfax Blvd			ĺ	Amount	•	
Suite 505			1	:		•
City	State	Zip Code		•	•	55000.00
Fairlax .	VA	22030	}	Transaction	ID : SE-95329 uisement or (93 25/1991/29
Purpose of Expenditure	. ····	. Colonomi				
Media Buy		Calegory/ Type 004	- 1	iii 10i	25	2016
Name of Federal Candidate			لمسل		<u> </u>	
!		Support	Office	Sought: 1	House	District: 00 ,
Donald J. Trump		** Oppose	X	President	Senale	State:
Calendar Year To-Date			Disbu	rsement For:	Primary	State:
Per Election for Office Sought	. 1 : 1	79620.65	2016	Other (s	pecify) 🕨	- Canada
Full Name of Payee				Date of Pub	lc Distribution	/Dissemination
AL Media LLC				и _р	. "31"	2016
Date of Dissemination: 10	/31/16	<u></u>		10	31	2016
Mailing Address 222 W Ontario SI			. }	Amount		
Suite 600			/	•		
City	State	Zip Code	·	Transaction i		115875,00
Chicago	IL	60654	İ		i) : SE-95417 Juisement or (
Purpose of Expenditure		Category/				2016
Media Buy		Type 004	Ì	10	27	2016
Name of Federal Condidate		Support	Office	Sought:	House	District:00
Donald J. Trump		Oppose	ĺ	-		
		X, Oppose				State:
Calendar Year-To-Date		4979620-65	Disbu 2016	rsement For:	Primary	General
Per Election for Office Sought	, ,			Other (s	pecify) 🕨	
	•	- u				
(a) SUBTOTAL of Itemized Independent Expenditures			•			170875.00
·		_		,	T	
(b) SUBTOTAL of Unitemized Independent Expenditu	rcs					
, , ,			-	•	I.	,
(c) YOTAL Indopendent Expenditures						433711.75
(-,	,		•	•	J .	430711.73
						
Under penalty of perjury I certify that the independent	t expenditures	reported herein were	not ma	ide in coopera	tion, consulta	tion, or concert
with, or at the request of suggestion of, any candidate party committee) any political party committee or its a		committee or agent of	or either	, or til the tep	ioriing entity i	s not a political
party community only pointed printy community of the tr	g					
Kally C. Ward			•	n 4 :	. *	y
Cinceture	•	Date	e 1	0 31	201	6
Signature						·

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	chedule E)		• • • • • • • • • • • • • • • • • • • •	PAGE	
ÑĀ	AME OF COMMITTEE (in Full)				SE OF FORM 24/48
	OCCC , , , , , , , , , , , , , , , , , ,			- Samuel Control of the Control of t	ICATION NUMBER V
				C C00000)935
Ch	neck If 🗷 24-hour report 48-hour report	New repo	ort Amends repo	rt filed on	J. Ivavava
	Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/0	04/16		Date of Public Distrit	oution/Dissemination 2016
	Mailing Address 11150 Fairfax Blvd			Amount	
	Suite 505			- hariandaniment	
	1		Zip Code 22030	Transaction ID : SE-	
	Purpose of Expenditure	1	Category/	Date of Disbursemen	المنتخضيما الحو
	Media Buy		Туре 004	10 2	7 2016
Ì	Name of Federal Candidate		Support	Office Sought: Hou	se District: 00
	Trump, Donald, J., ,		X Oppose	President Sen	
	Calendar Year-To-Date Per Election for Office Sought	ميد چېمون ساوست ميدا دغمينادست همده	6419383,70	Disbursement For: Port Port Port Port Port Port Port Port	rimary 🗶 General
	Full Name of Payce			Date of Public Distril	
Ì	AL Media LLC Date of Dissemination: 11/0)4/16		11 04	4 2016
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ı	Suite 600			. In the farmer describer of the second	
	/		Zip Code	Transaction ID : SE-	3750.00
	Chicago	IL	60654	Transaction ID : SE-9 Date of Disbursement	
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١			Т Оррозе	X President Sen	
	Calendar Year-To-Date Per Election for Office Sought	handinadand) in	6419383.70	Disbursement For: P 2016 Other (specify)	rimary 🗶 General
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١	Under penalty of perjury I certify that the independent with, or at the request or suggestion of, any candidate party committee) any political party committee or its age	or authorized	reported herein were committee or agent of	not made in cooperation, co I either, or (if the reporting e	nsultation, or concert inity is not a political
	Ward, Kelly, C., .	/Electroni	ically Filed Date	11 04 Y	2016
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	Image# 201611049037121059 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES						
	nedule E)	MULITI LAFLITE	JIIONES		PAGE 9 OF 11		
NAM	IE OF COMMITTEE (In Full)	•			FOR SE OF FORM 24/48		
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	Full Name of Payee Screen Strategies Media, LLC	5		_	Date of Public Distribution/Dissemination		
1	Date of Dissemi Mailing Address 11150 Fairfax Blvd	ination: 11/04/16			11 04 2016		
],	Suite 505				Amount		
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- 1	Fairfax	. VA	22030		Transaction ID : SE-954882 Date of Disbursement or Obligation		
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٨	Name of Federal Candidate		Support	Office	e Sought: House District: 00		
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	The New Media Firm, Inc.	nination: 11/04/16			11 04 2016		
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Į	Suite 213				Amount		
17	City	Stale	Zip Code		46000.00		
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wit	nder penalty of perjury I certify that the in th, or at the request or suggestion of, any orty committee) any political party committee	y candidate or authorize	ed committee or agent c	not ma	ade in cooperation, consultation, or concerter, or (if the reporting entity is not a political		
	Ward, Kelly, C., .	/Electr	onically Filed) Date	. Г ит	11 04 2016		
	Signature			, I	tived housement housement-		

SCHEDULE E

SCHEDULE E (FEC FORM 3X) ITEMIZED INDEPENDENT EXPENDITURES	,				PAGE 109	024 OF .1091.07
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NAME OF COMMITTEE (In Full)				FEC II	DENTIFICAT	ION NUMBER ¥
DCCC				С	C0000093	5
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Full Name of Payer Screen Strategies Media, LLC		, Mema	ilem	Date of Publi		n/Dissemination
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Full Name of Payec The New Media Firm, Inc. Date of Dissemination: 11/01/16		· Memo	Itern	Date of Publi	ic Distribution	T/Dissemination
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Suite 213		<u>.,,</u>		Amount		
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Name of Federal Candidate:		Support	Office	Sought:	House	District:
Trump. Donald. J ,		x Oppose	ł	President	Schale	State:
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Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any condide party committee) any political party committee or its	ate or authorize					
Ward Kelly, Co.						•
Signature	/Electronically Fi	ilwl/ Date	12	08	20	118

	/48 HOUR REPORT OF INDEPEN chedule E)	DENT EXPEN	DITURES			PAGE 51	
NA	ME OF COMMITTEE (In Full)		 		, EEO		F FORM 24/48
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	Full Name of Payer				Date of Publ	lic Distribution	VDIssemination
	Screen Strategies Media, LLC: Date of Dissemina	ilion: 10/18/16			10	, b r. 18	2016
	Mailing Address 11150 Fairfax Blvd				10	10	2010
	Suite 505			- 1	Amount		
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	Name of Federal Candidate .		Support	Office	Sought:	House	District: 00
	Donald J. Trump		X Oppose		_	Senale	
	Calendar Yoar-To Date			Diebu	reement For	Primar	X General
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	Full Name of Payee	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·		Date of Arbi	in Clintain than	/Dissemination
	Kully Hall, LLC			:		·	
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	Oonald J. Trump		X, Oppose	1 12	Praeuteni *	Sonato	Siate:
	Calendar Year-To-Date Per Election for Office Sought	,	2613000.20	Disbu 2016	rsement For:	Primary	y X General
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	Kelly C. Ward		Date	. 11	,, . D 19	2 0 1	3 16
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	chedule E)	CHOCK EXICIO			PAGE 3 OF 3
					FOR SE OF FORM 24/48
	ME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER ▼
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					Construct which the designature has the
Ch	eck if 24-hour report X 48-hour	report : X New repo	ort Amends repo	rt filed on 🖟	as a last harm
	Full Name of Payee	•		Date	of Public Distribution/Dissemination
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	Mailing Address 650 Massachusetts Ave	enuo, NW		Amo	
	Suite 210			4	ار ما ما المار br>و 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1
	City	State	Zip Code		57500.00
	Washington	DC	20001		saction ID : SE-951439 of Disbursement or Obligation
	Purpose of Expenditure		Catogory/		Lot Disputsament of Ordigation
	Media Buy	•	Type 004	_]]	10 11 2016
- 1	Name of Federal Candidate		Support	Office Saug	ht: House District: 00
-	Trump, Donald, J., ,		У Оррозн	X Presid	dent Senate State:
ı	Calendar Yoar-To-Date	ندمهساسه، به ماد با	adaminate adam d	Disbursome	nt For: Primary X General
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	Full Name of Payee				of Public Distribution/Dissemination
•	Screen Strategies Media, LL	C emination: 10/12/16		1 ;	10 12 2016
	14-15- 4-14	Sharladdi. 10/12/10		j	10 1 12 1 2010
ı	Trigor billar billa	•		Anio	unt
	Suite 505	State	Zip Code	—— I *··	74632.00
	Cily Fairfax	VA	22030	Trans	action ID : SE-951438
					of Disbursement or Obligation
	Purpose of Expenditure Media Buy		Category/ 004] [10 11 2016
i	Name of Foderal Candidate		Support	Offico Sous	tht: House District: 00
	Trump, Donald. J., .		Oppose	resi	barrata l
İ		•	(;;,) oppos		
	Calendar Year-To-Date Per Election for Office Sought		1534583.62	Disbursome 2016	G. 1 1 1.1.1
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	(a) SUBTOTAL of Itemized Independent	Expenditures		• [132132.00
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	(b) SUBTOTAL of Unitemized Independent	ent Expenditures		· • • • • • • • • • • • • • • • • • • •	8 Warmer of the Parish
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	(c) TOTAL Independent Expenditures,		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	•	170032.00
,	Under penalty of perjury I certify that the with, or at the request or suggestion of, party committee) any political party comm	any candidate or authorized	reported herein were committee or agent a	not made in f either, or (i	cooperation, consultation, or concert' I the reporting entity is not a political
	Ward, Kully, C.,		_	4. t) ·	
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	Signature				

24/48 HOUR REPORT OF INDEPENDENT EXPEND (Schedule E)	ITURES	PAGE 17 OF 17
NAME OF COMMITTEE (In Full)		FOR SE OF FORM 24/48
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		C c00000935
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Full Name of Payao Screen Strategies Media, LLC Date of Dissemination: 10/20/16		Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd		10 20 1 2016
Suite 505		Amount
City State	Zip Code	107040.00
Fairfax VA	22030	Transaction ID : SE-952389 Date of Disbursement or Obligation
Purpose of Exponditure Media Buy	Category/ Type 004	10 18 2016
Name of Federal Candidate	Support	Office Sought: House District: 00
Donald J. Trump	Oppose	
Calendar Yaar-To-Date Por Election for Office Sought	989611.20	Disburscment For: Primary General 2016 Cher (specify)
Full Name of Payed AL Media LLC Date of Dissemination: 10/20/16		Date of Public Distribution/Dissemination
Mailing Address 222 W Onterio St		Amount
Suite 600		
City State Chicago : IL	Zip Code 60654	140250.00 Transaction ID : SE-952071
Purpose of Expenditure	l aurant	Date of Disbursement or Obligation
Media Buy	Category/ 004	10 17 2016
Name of Federal Candidate	Support	Office Sought: House District: 00
Donald J. Trump	∑ Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought	2989611.20	Olsbursement For: Primary General
		1 2 3 3 4 5 5 5 6 5 6 6 6 6 6 6 6 6 6 6 6 6 6 6
(a) SUBTOTAL of Itemized Independent Expenditures		247290.00
(b) SUBTOTAL of Unitemized Independent Expenditures		•
(c) TOTAL Independent Expenditures		652070.38
Under penalty of perjury I certify that the independent expenditures with, or at the request or suggestion of, any candidate or authorized party committee) any political party committee or its agent.	reported herein were I committee or agent o	not made in cooperation, consultation, or concert of either, or (if the reporting entity is not a political
Kelly C. Ward	Date	10 21 2016
Signature		

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 15 OF 15
Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C c00000935
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Full Namo of Payee	Date of Public Distribution/Dissemination
Prism Communications, Inc. Oste of Dissemination: 10/27/16	10 27 2016
Malling Address 1000 Potomac Street, NW	
Suite 420	Amount
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
Donald J. Trump Qppose	President Senate State:
	Disbursement For: Primary 1 General
Per Election for Office Soughs 4550355.45	2016 Other (specify) ▶
Full Name of Payee	Date of Public Distribution/Dissemination
76 Words Corp. Date of Dissemination: 10/26/16	10 26 2016
Mailing Address 1121 5th St. NW	
Floor #1	Amount
City State Zip Code	5500.00
Washington DC 20001	Transaction ID : SE-954171 Date of Disbursement or Obligation
Purpose of Expenditure Media Production Caregory/ Type Caregory/ Type	10 27 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Donald J. Trump	President Senuto State:
	Disbursement For: Primary K General
Per Election for Office Sought 4436718.92	Other (specify) >
(a) SUBTOTAL of Itemized Independent Expenditures	8791.58
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	771178,77
Under penalty of perjury I certify that the independent expenditures reported herein were newith, or at the request or suggestion of, any candidate or authorized committee or agent of party committee) any political party committee or its agent.	ot made in cooperation, consultation, or concart either, or (If the reporting entity is not a political
Kelly C. Ward	u # / 5
Signature	10 27 2016

	chedule E)	PAGE 22 OF 25 FOR SE OF FORM 24/48
	NME OF COMMITTEE (In Full) OCCC	FEC IDENTIFICATION NUMBER ▼
Ci	neck II 24-hour report X 48-hour report X New report Amends report f	Bed on
	Full Name of Payee Kully Hall, LLC Date of Dissemination: 10/12/16 Mailing Address 1932 1st Ave. Sulte 203	Date of Public Distribution/Dissemination
	City State Zip Code	Amount 4297.00
	Scattle WA 98101	Transaction ID : SE-951665 Date of Disbursement or Obligation
	Media Buy Media Production Typo	10 14 2016
	Branch & Warner	flice Sought: House District: 00 President Senate State:
		Isbursement For: ☐ Primary ☐ General
	Full Name of Payes The New Media Firm, Inc. Date of Dissemination: 10/12/16	Oate of Public Distribution/Dissemination
	Mailing Address 1730 Rhode Island Avo., NW Suite 213	Amount
	Cily State Zip Code Washington DC 20036	56930.43 Trensaction ID : SE-951666 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy Category/ Type G04	10 12 2016
	Booth (Yuman	Hilce Sought: House District: 00 President Senato State:
	Calendar Ynar To-Date	isbursement For: ☐ Primary ☐ General 016 ☐ Other (spocify) ▶
	(a) SUBTOTAL of Itemized Independent Expanditures	61227.43
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	(c) TOTAL Independent Expenditures	The first state of the first sta
	Under penalty of perjury I certify that the independent expenditures reported herein were not with, or at the request or suggestion of, any candidate or authorized committee or agent of ei party committee) any political party committee or its agent.	
	Kelly C. Ward Date Signature	10 14 2016 1

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34/48 HOUR REPORT OF INDEPEN Schedule E)	DENI EXPEND	IIUKES		PAGE 21 OF 25 FOR SE OF FORM 24/48
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City	State	Zip Code		4047.25
Washington	DC	20036	Transaction	ID: SE-951654 ursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type	10	12 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Trump, Donald, J., ,		X Oppose	★ President	Senate State:
Calendar Year-To-Date r Per Election for Office Sought	garina di manana	1721688.30	Disbursement For: 2016 Other (sp	Primary General Decify) ▶
Full Name of Payee Screen Strategies Media, LLC Date of Dissemin	ation: 10/12/16			C Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd Suite 505			Amount	
City	State	Zip Code	<u> </u>	121850.00
Fairfax	VA	22030	Transaction II Date of Disbu	D : SE-951660 ursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004	10 10	
Name of Federal Candidate		Support	Office Sought:	House District: 00
Trump, Donald, J., ,		M Oppose	✗ President	Senate State:
Calendar Year-To-Date Per Election for Office Sought	مواهدها الدارسات المارسات الم	1721688.30	Disbursement For: 2016 Other (sp	Primary ✗ General
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(c) TOTAL Independent Expenditures				na fa i ana 22 na an atamén na
Under penalty of perjury I certify that the indewith, or at the request or suggestion of, any oparty committee) any political party committee	candidate or authorized			
Ward, Kelly, C., ,	<i>l Electron</i>	nically Filed) Date	ุม ม / กัก : 10 · 14	7
Signature	Zaction	Date	10 14	2010

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NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
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	C C00000935
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Full Name of Payee	Date of Public Distribution/Dissemination
The New Media Firm, Inc. Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 1730 Rhode Island Ave., NW	former to the terminal for the terminal
Suite 213	Amount
City State Zip Code	4047.25
Washington _ DC 20036	Transaction ID : SE-952372 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production Category/ Type	10 14 2016
Name of Federal Candidate Support Office	e Sought: House District: 00
Trump, Donald, J., ,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought Disb 2016	oursement For: Primary General General General
Full Name of Payce Screen Strategies Media, LLC	Date of Public Distribution/Dissemination
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City State Zip Code	121850.00
Fairfax VA 22030	Transaction ID : SE-952373 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type O04 Type	10 14 2016
	ce Sought: House District: 00
Trump, Donald, J., ,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought Dist 201	oursement For: Primary General Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	125897.25
(b) SUBTOTAL of Unitemized Independent Expenditures	
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(c) TOTAL Independent Expenditures	لأنافهم لوارة وفيصابة وفا فينطشأ
Under penalty of perjury I certify that the independent expenditures reported herein were not me with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	
Ward. Kelly, C., . [Electronically Filed] Date	10 , 18 , 2016 ,
Signature	

24/48 HOUR REPORT OF INDEPENDE (Schedule E)	NT EXPEND	ITURES		PAGE 3 OF 3
NAME OF COMMITTEE (In Full)				FOR SE OF FORM 24/48
DCCC			J	FEC IDENTIFICATION NUMBER ▼
				C C00000935
Check if 24-hour report 3 48-hour report	New re	port [_] Amends repo	ort filed on	Tung / 10/40 / 14/4/14/14
Full Name of Payee Buying Time, LLC				of Public Distribution/Dissemination
Date of Dissemination Mailing Address 650 Massachusetts Avenue, NV			─	10 11 2016
Suite 210			Amour	nt
City	State	Zip Code		57500.00
Washington	DC	20001		action ID: SE-951439 If Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004		10 11 2016
Name of Federal Candidate		Support	Office Sought	: House District: 00
Donald J. Trump		Oppose	Preside	nt Senato State:
Calendar Year-To-Date Per Election for Office Sought	1. 	459931.62	Disbursement	
Full Name of Pavee				of Public Distribution/Dissomination
Screen Strategies Media; LLC Date of Dissemination	n: 10/12/16			10 12 1 2016
Mailing Address 11150 Fairfex Blvd				المستسعيط استعسما است
Suite 505			Arnour][
City	State	Zip Code	; '``	74632.00
Fairlex	VA	22030		ction ID : SE-951438
Purpose of Expenditure Modia Buy		Category/ 004		10 11 2016
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Donald J. Trump		Oppose	Preside	nt Senate State:
Calendar Year To-Date Per Election for Office Sought	• •	1534563.62	Disbursement 2016	For: Primary General
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(b) SUBTOTAL of Uniternized Independent Expen	ditures	> 1011	•	
			•	hand the statement of the statement of
(c) TOTAL Independent Expenditures			▶ i.	170032.00
Under penalty of perjury I certify that the Indepen with, or at the request or suggestion of, any candl party committee) any political party committee or it	date or authorized	raported herein were I committee or agent o	not made in co f either, or (if ti	operation, consultation, or concert ne reporting antity is not a political
Kelly C. Ward			u·u ,	n-0,1"7 7 7 7 7 9
Signalure	**	Date .	; 10 ; ,	13 2016

24/48 HOUR REPORT OF INDEPENDENT (Schedule E)	EXPENDITURES	PAGE 50 OF 60			
		FOR SE OF FORM 24/48			
NAME OF COMMITTEE (In Full) DCCC	_	FEC IDENTIFICATION NUMBER V			
bece		C; c00000935			
Check if 24-hour report 1 48-hour report	New report [_] Amonds report file	d on			
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/2:	£/4£	Date of Public Distribution/Dissemination			
Mailing Address 11150 Fairfax BVd	Ji Tu	1 10 1 12 1 1 2010 2011			
Sulte 505		Amount			
City	late Zio Code	1 121850.00			
Fairfax	VA 22030	Transaction ID : SE-952388 Date of Disbursement or Obligation			
Purpose of Expenditure Media Buy	Category/ Type 004	10 18 2 2016			
Name of Federal Candidate	Support Offic	e Sought: House District: 00			
Donald J. Trump	Oppose X	President Senate State:			
Calendar Year Yo-Date Per Election for Office Sought	4369947.93 Disb	pursoment For: Primary X General Other (specify) >			
Full Name of Payee		Date of Public Distribution/Dissemination			
Buying Time, LLC Date of Dissomination: 10/2	5/16	10 1 25 2016			
Mailing Address 650 Massachusetts Avonue, NW]			
Suite 210		Amount			
City	state Zip Code	19691.00			
Washington	DC 20001	Transaction ID : SE-953229 Date of Disbursement or Obligation			
Purpose of Expenditure Media Buy	Calegory/ 1004	10 24 2016			
Name of Federal Candidate	Support Office	ce Sought: House District: 00			
Donald J. Trump	Oppose X	President Senate State:			
Calendar Year-To-Dato Per Election for Office Sought	4369947.93 201				
,		Other (specify) ▶			
(a) SUBTOTAL of Itemized Independent Exponditures	>	141541,00			
(b) SUBTOTAL of Unitermized Independent Expenditures	9				
(c) TOTAL Independent Expenditures	>	the second second			
with, or at the request or suggestion of, any candidate of	Under penalty of perfury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or of the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.				
Kelly C. Word Signature	Date	10 25 2016			

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Selective E) PAGE 57 OF 57						
(Sc	chedule E)			FOR SE OF FORM 24/48		
	ME OF COMMITTEE (In Full)			FEC IDENTIFICATION NUMBER ▼		
D	CCC			C C00000935		
				O State of the sta		
Ch	eck If X 24-hour report 48-hour report New report Amend	ds repo	rt filed on	Caral (exa)		
	Full Name of Payee		0	ate of Public Distribution/Dissemination		
	Buying Time, LLC Date of Dissemination: 11/01/16			11 01 2016		
	Malling Address 650 Massachusetts Avenue, NW			المستعمل المتعمل المتع		
	Suite 210		^	Amount		
	City State Zip Code			17175.00		
	Washington . DC 20001			ransaction ID : SE-954373 ate of Disbursement or Obligation		
	Purpose of Exponditure Media Buy Category Type	004		10 28 2016		
	Name of Federal Candidate Sup	port	Office S	ought: House District: 00		
	Donald J. Trump Opp	ровв	X Pr	esident Senate State:		
	Calendar Your To-Date	,		ment For: Primary General		
	Por Election for Office Sought 5894458.07	_1	2016	Other (specify)		
1	Full Name of Payee			ate of Public Distribution/Olssemination		
ı	Screen Strategies Media, LLC Date of Dissemination: 11/01/16			المعديد المعداء المغط المادعة		
J	Mailing Address 11150 Foirfax Blvd			11 01 2016		
١	Suite 505		A	mount		
ı	City State Zip Code		f	74850.00		
	Fairfax VA 22030			ensaction ID : SE-954175 late of Disbursement or Obligation		
	Purpose of Expenditure Media Buy Category/ Type	004		10 27 2018		
	Name of Federal Cendidate Sup	pport	Office S	ought: House District: 00		
ı	Donald J. Trump	pose	XX Pr	esident [] Senate State:		
	Calendar Year-To-Date	1	Disburse 2016	ment For: Primary S Goneral		
	Per Election for Office Sought 5894458.07	_}	2010 j	Other (specify) >		
			_			
((a) SUBTOTAL of Itemized Independent Expenditures		•	92025.00		
	(b) SUBTOTAL of Unitemized Independent Expenditures		ŗ	- Andreadanne - Santa - Santa - Santa - Santa - Santa - Santa - Santa - Santa - Santa - Santa - Santa - Santa -		
,	by 500 10 IAC or official control of the control of	*******		أأسامت مستهدد المامات		
-	(c) TOTAL Independent Expenditures	•••••	· • •	14333615.05		
٧	Under penalty of perjury I certify that the independent expenditures reported herein with, or at the request or suggestion of, any candidate or authorized committee or a party committee) any political party committee or its agent.					
	Kelly C. Ward		t'u i 'n	1 - 1 4 - 0 1 - 4 - 4 - 4 - 4 - 4 - 4 - 4 - 4 - 4 -		
	Signature	Cato	1 11	02 2016		

Image# 201611069037127397 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

Schedule E)	PAGE 11 OF 12 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C c00000935
Check If X 24-hour report 48-hour report New report Amends report filed	ou Man , Loan , Landana
Full Name of Payee	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 11/05/16	11 05 2016
Mailing Address 11150 Fairfax Blvd	Amount
Suite 505	Institute - Ameliandendendendendendende
City State Zip Code Fairfax VA 22030	Transaction ID : SE-954453 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy . Category/ Type 004	10 31 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Truma Daneld I	President Senate State:
Calendar Year-To-Date Per Election for Office Sought Disbut 2016	rsement For: Primary 🗶 General Other (specify) ▶
Full Name of Payeo	Date of Public Distribution/Dissemination
Canal Partners Media, LLC Date of Dissemination: 11/06/16	11 06 2016
Mailing Address 25 Whitlock Place	Amount
Suite 200 City State ZIp Code	7910.00
Marietta GA 30064	Transaction ID : SE-954884 Date of Disbursoment or Obligation
Purpose of Expenditure Media Buy Category/ Type 004	M 11 1 03 7 2016
Name of Fedoral Candidate Support Office	Sought: House District: 00
Trump, Donald, J., ,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought Disbut 2016	rsement For: Primary 🗷 General ☐ Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	66610.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	72447
Under penalty of perjury I certify that the independent expenditures reported herein were not may with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert r, or (if the reporting entity is not a political
Ward, Kelly, C [Electronically Filed] Date 1	1 06 2016
Signature	

lmage#	201610189033039653			
24/48	HOUR REPORT	OF	INDEPENDENT	EXPENDITURES

(Schedule E)			PAGE 19 OF 25 FOR SE OF FORM 24/48			
NAME OF COMMITTEE (In Full) DCCC			FEC IDENTIFICATION NUMBER ▼			
			C C00000935			
Check if 24-hour report 🗶 48-hour re	Check if 24-hour report					
Full Name of Payee Ralston Lapp Media, LLC			Date of Public Distribution/Dissemination			
Date of Disser	mination: 10/14/16		10 14 2016			
Mailing Address 1054 31st Street, NW Suite 430			Amount			
City	State	Zip Code	12260.71			
Washington	DC	20007	Transaction ID : SE-951677 Date of Disbursement or Obligation			
Purpose of Expenditure Media Production		Category/ Type 004	10 14 7 2016			
Name of Federal Candidate		Support	Office Sought: K House District: 23			
Hurd, William, , ,		X Oppose	President Senate State: TX			
Calendar Year-To-Date Per Election for Office Sought		1648833.65	Disbursement For: Primary General Other (specify) ▶			
Full Name of Payee Buying Time, LLC	minotion: 10/14/19		Date of Public Distribution/Dissemination			
Malling Address 650 Massachusetts Av	mination: 10/14/16		10			
Sulte 210		•	Amount			
City	State	Zip Code	53000.00			
Washington	DC	20001	Transaction ID : SE-952374 Date of Disbursement or Obligation			
Purpose of Expenditure Media Buy	·	Category/ Type 004	10 13 / 2016			
Name of Federal Candidate		Support	Office Sought: House District: 00			
Trump, Donald, J., .	•	K Oppose	× President Senate State:			
Calendar Year-To-Date Per Election for Office Sought		1919459.68	Disbursement For: ☐ Primary General Other (specify) ☐			
(a) SUBTOTAL of Itemized Independent E	xpenditures		65260.71			
1-1 00-101110 01 1101110111101111	F =		00200.71			
(b) SUBTOTAL of Unitemized Independen	t Expenditures	***************************************	77. 4 . 27. 4 . 27. 4			
(c) TOTAL Independent Expenditures	•					
(C) TOTAL Independent Expenditures			· • • • • • • • • • • • • • • • • • • •			
	ny candidate or authorized		not made in cooperation, consultation, or concert of either, or (If the reporting entity is not a political			
Ward, Kelly, C., ,	Electron	ically Filed Date	10 18 2016			
Signature	ناور برخمسد وقبر حرب ب	· · · · · · · · · · · · · · · · · ·	trail hand become			

1Mage# 201610199033071490 24/48 HOUR REPORT OF INDE	PENDENT EXPEND	ITURES		
(Schedule E)			~	PAGE 52 OF 52 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			EEC	IDENTIFICATION NUMBER V
DCCC			اقا	والمدود في المداول المداول المداول المنظول المنظول الماطول الما
				C00000935
Check II 24-hour report 3 48-hour	r report New report	ort Amends rep	ort filed on	, 040 , 44444
Full Name of Payer			Date of Pub	lic Distribution/Dissemination
The New Media Firm, Inc. Date of Diss	semination: 10/18/16		10	18 2016
Mailing Address 1730 Rhode Island Ave	e., NW		Amount	I landard Landardson,
Suite 213				
City	State	Zip Code		3407.87
Washington	DC	20036		n ID : SE-952382 bursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type	10	18 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Trump, Donald, J., ,		X Oppose	★ President	Senate State:
Calendar Year-To-Date	1-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4		Disbursement For:	Primary X General
Per Election for Office Sought		2613000.20	2016 Other (specify) >
Full Name of Payee	•		Date of Pul	olic Distribution/Dissemination
Buying Time, LLC	semination: 10/18/16		100	18 2016
Mailing Address 650 Massachusetts				2010
Suite 210			Amount	
City	State	Zip Code		83829.00
Washington	DC	20001		ID : SE-952073 bursement or Obligation
Purpose of Expenditure		Category/	77-71-	I COTOL CARAGORIA
Media Buy		Type 004		17 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Trump, Donald, J., ,		X Oppose	₩ President	Senate State:
Calendar Year-To-Date	for during in the shape		Disbursement For:	Primary Seneral
Per Election for Office Sought	- Indiana indiana	2613000.20	2016	specify) ▶
(a) SUBTOTAL of Itemized Independent	t Expenditures	·····	>	87236.87
	•			السيدانية المسالسة المسالسة المسالسة
(b) SUBTOTAL of Unitermized Independ	ent Expenditures		>	
	•			
(c) TOTAL Independent Expenditures			··· >	11152409.38
Under penalty of perjury I cortify that the with, or at the request or suggestion of party committee) any political party committee.	any candidate or authorized	roported herein were d committee or agent	on ot made in cooper of either, or (if the ro	ation, consultation, or concert porting entity is not a political
Ward, Kelly. C., ,	IElectros	ically Filed Dai	10 10 10	2016
Signature	g	Dai	"لنا لت	المستنسما

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 52 OF 60
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) FEC I	DENTIFICATION NUMBER Y
DCCC	C00000935
Check if 24-hour report 48-hour report New report Amends report filed on	1 0 70 1 7 7 7 7 7
Full Name of Peyare Date of Publ	ic Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/25/16	25 2016
Mailing Address 11150 Fairfax Blvd Amount	ۇنىدەنىدەنىنىڭ ئىدر <i>د</i> ىدا
Suite 505	· p · ra · w — materialismed
City State Zip Code	64326.00
	ID : SE-953184 ursement or Obligation
Purpose of Expenditure Media Buy Calegory/ Type 004 10	21 2016
Name of Federal Candidate Support Office Sought:	House District: 00
Donald J. Trump Oppose President	Senate State:
Calendar Year-To-Date Per Election for Office Sought A369947.93 Disbursement For: 2016 Other (sp	Grand Winny
	ic Distribution/Dissemination
Buying Time, LLC Date of Dissemination: 10/25/16	25 2016
Mailing Address 650 Massachusatts Avenue, NW	23 2010
Sulte 210	
City State Zip Code	62488.00
Washington DC 20001 Transaction in Oate of Disb	D: SE-953185 ursoment or Obligation
Purpose of Expenditure Media Buy Category/ Type O04 Type	21 2016
Name of Federal Candidate Support Office Sought;	House District: 00
Donald J. Trump X Oppose X President	Senate State:
Calendar Year-To-Date Per Election for Office Sought Disbursement For: 2016 Other (st	IZ.N
	· · · · · · · · · · · · · · · · · · ·
(a) SUBTOTAL of itemized Independent Expenditures	126814.00
	وحس والمراجد والمادو
(b) SUBTOTAL of Unitemized Independent Expenditures	in the transfer of
(c) TOTAL Independent Expenditures	The second second
Under penalty of parjury I certify that the independent expenditures reported herein were not made in cooperal with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the represent committee) any political party controlline or its agent.	ion, consultation, or concert orling entity is not a political
Relly C. Ward	1 1 4 1 4 1 4 1 4 1 4 4 4
Signature Onte 10 25	2016