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

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

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

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. 8 Each of the advertisements involved explicit references to clearly identified House candidates and a clearly identified discussion of Donald Trump and were accounted for according to the following model:

- Some of the advertisements expressly advocated the defeat of both the Republican House candidate and Trump. (e.g., "Vote No on [Republican congressional candidate] and Donald Trump"). In these cases, the DCCC paid for and reported the portion of the advertisement attributable to Trump as an independent expenditure opposing him. The remainder was either paid entirely by the Democratic congressional campaign, or split between the campaign and the DCCC, with the DCCC treating its share of the remainder as a coordinated expenditure. Advertisements that included express advocacy against Donald Trump are discussed in MURs 7169, 7170, 7171, 7174, 7176, and 7182.10
- Other ads mentioned both House candidates and Donald Trump, but did not expressly advocate Trump's defeat. Rather, these ads focused on Trump's positions on key issues like national security, immigration, women's health, or gun control and his actions causing unrest and harm to the country. In these cases, the portion of the advertisements that concerned congressional candidates was either paid in whole by the Democratic House campaign, or split between the campaign and the DCCC using funds available under the coordinated party expenditure limits.11 The remainder was paid for by the DCCC and reported as an operating expense. The ads that did not expressly advocate Trump's defeat are discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188. 12

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

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

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

¹⁰ The advertisement in MUR 7169 can be found here: https://www.youtube.com/watch?v=7mb2DsowG00. The advertisement in MUR 7170 can be found here: https://www.youtube.com/watch?v=ulkmwN7ivMU. The advertisement in MUR 7171 can be found here: https://www.youtube.com/watch?v=LS-gU95vm9U. The advertisement in MUR 7174 can be found here: https://www.youtube.com/watch?v=g 4kBjw8r-U. The advertisement in MUR 7176 can be found here; https://www.youtube.com/watch?v=WCx30bETyrE. The advertisement in MUR 7182 can be found here: https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

¹¹ See Exhibit B.

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

https://www.youtube.com/vatch?v=7KxcnuejChU&feature=youtu.be. The advertisement in MUR 7178 can be found here: https://www.youttibe.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=epFwW3WyQWe. For the advertisement in MUR 7177, the Colorado Democratic Party similarly split the costs of the advertisement with Carroll for Colorado on a time/space basis.

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

All of the advertisements discussed in the Complaints were conceived and executed by the DCCC independently of HFA or its agents. 14 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
 - A. Commission rules clearly provide for attribution among multiple candidates.

11 C.F.R. § 106.1(a) provides that "expenditures, including in-kind contributions, independent expenditures, and coordinated expenditures made on behalf of more than one clearly identified Federal candidate shall be attributed to each such candidate according to the benefit reasonably expected to be derived."18 For a television ad, the regulation is explicit about how to make this attribution: it "shall be determined by the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates."19 The Commission has repeatedly and consistently applied this regulation when evaluating communications that refer to multiple candidates. 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.

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

¹⁷ The vast majority of vendors working on the ads at issue in these matters did not work for HFA. Two vendors who did work on two different advertisements also did work for HFA but did not use any non-public information about HFA's plans, projects, activities, or needs in working on the advertisement. See Exhibit C. ¹⁸ 11 C.F.R. § 106.1(a). ¹⁹ 1d.

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

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

In attributing the cost of a communication among multiple candidates, the Commission does not look to whether or not the segment associated with a particular candidate contains express advocacy. For example, in Advisory Opinion 2004-01, issued to Bush-Cheney '04, Inc. and Alice Forgy Kerr for Congress, the Commission understood that the ad would "not mention or refer to the President's candidacy for re-election [or] expressly advocate the election nor defeat of any presidential candidate." Still, the Commission confirmed that the costs of the communication must be attributed between the two campaigns based on the proportion of space or time devoted to each candidate under 11 C.F.R. § 106.1(a), even though the ad expressly advocated one candidate's election and not the other's. Similarly, in Advisory Opinion 2010-10, the Commission held that when a broadcast communication expressly advocated the election of one candidate, referred to an opposing candidate without expressly advocating defeat, and expressly advocated the election of a third candidate in an altogether different race, the references to the opposing candidate would be attributed to the first candidate under 11 C.F.R. § 106.1(a).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. And in Advisory Opinion 2006-11, the Commission considered a state party mailing that would expressly advocate for a federal candidate and for other generically referenced candidates of the party committee. The Commission held that, while no less than 50% of the costs could reasonably be attributed to the one identified candidate, "it is appropriate to apply analogous 'space or time' principles set out in 11 C.F.R. 106.1(a)" and that "the benefit reasonably expected to be derived by the clearly identified candidate should be

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

²³ FEC Adv. Op. 2004-01 (Bush/Kerr).

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

²⁵ FEC Adv. Op. 2010-10 (NRL PAC).

²⁶ FEC Adv. Op. 2004-29 (Akin) at 6.

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

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

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

В. Respondents attributed the advertisements correctly.

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

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

²⁹ See FEC Adv. Op. 2010-14 (DSCC) (approving allocation of expense between campaign and recount activities);

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. 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. The Commission has repeatedly held that when a federal campaign pays for the portion of an advertisement

33 See Exhibit B

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

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

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

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

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

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

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

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

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

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

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

35 See Exhibit B.

36 Id.

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

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

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

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

³⁷ 11 C.F.R. § 100.16.

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

https://www.youtube.com/watch?v=ulkmwN7ivMU; Nelson for Wisconsin, No, YouTube (Oct. 10, 2016) at :25 ("Mike Gallagher says we still have to support Donald Trump. No, we don't; we don't have to support Mike Gallagher either"), https://www.youtube.com/watch?v=LS-gU95vin9U; Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016) at :28 ("Vote No on Donald Trump and David Young"),

https://www.youtube.com/watch?v=g_4kBjw8r-U; Suzanna Shkreli for Congress, Brags, YouTube (Oct. 14, 2016) at :22 ("Vote No on Donald Trump and Mike Bishop"), https://www.youtube.com/watch?v=WCx3ObETyrE; Bryan Caforio for Congress, Stand Up, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

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. Furgaich, 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 Jennifer May, in her official capacity as treasurer

Exhibit A

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF MICHAEL IAN RUSSELL

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

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

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

Michael Joh Duccall

Exhibit B

"YOU AND OUT

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

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE PAGE 109105 OF 109107

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SCHEDULE F (FEC Form 3X)

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

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

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SCHEDULE F (FEC Form 3X)

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PAGE 47535 OF 47535

SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OF DESIGNATED AGENTS

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

PAGE 83515 OF 63518 (To be used only by Political Committees in the General Election) FOR LINE 25 OF FORM 3X NAME OF COMMITTEE (In Full) DCCC Full Name of Subordinate Committee Has your committee boon designated to make coordinated expenditures by a political party committee? DCCC x YES NO If YES, name the designating committee: Mailing Address 430 South Capitol Street, SE Democratic National Committee & 2nd Floor ZIP Code State California Democratic Party Washington 20003-4024 DC Full Name (Last, First, Middle Initial) of Each Payee Memo Item Purpose of Expenditure Media Services The New Media Firm, Inc. Category/ Type Mailing Address 1730 Rhode Island Ave., NW Date Suite 213 State Zip Code City 09 20 2016 Washington DC 20036 Name of Federal Candidate Supported Office Sought: State: Amount Applegate, Doug, Loren, . Senate District: 49 91200,00 Presidential Aggregate General Election 91200.00 Expenditure for this Candidate Transaction ID: SF-949904 Full Name (Last, First, Middle Initial) of Each Payee Purpose of Expenditura Memo item Media Services Screen Strategies Media, LLC Category/ Type Mailiny Address 11150 Fairfax Blvd Suite 505 Date Zip Code City State 09 23 2016 VA 22030 Fairfex Name of Federal Candidate Supported Office Sought: 'X House State: CA Amount Senate District: Caforio, Bryan, . . 25 Presidential 46490.00 Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID : SF-950014 Full Name (Last, First, Middle Initial) of Each Payee Purpose of Expenditure . Memo Item Media Services Screen Strategies Media, LLC Category/ Type Mailing Address 11150 Fairfex Blvd Date Suite 505 Slale Zip Code City .09 28 2016 22030 Name of Federal Candidate Supported Office Sought: House State: Amount 25 Cafono Bryan. . . Senate District: Presidential 13431.04 Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID: SF-950737 151121.04 SUBTOTAL of Expenditures This Page (optional)...... TOTAL This Period (last page this line number only)......

Exhibit C

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF MAURA JOHNSON - MUR 7179

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

MJ 12/21/16

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

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

Maura Johnson

BEFORE THE

FEDERAL ELECTION COMMISSION

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

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

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

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

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

David Dixon

Richard Davis

Exhibit D

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 9 OF 9
	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
	C C00000935
Check if 24-hour report 48-hour report New report Amonds report fil	led on Thirty Thirty Thirty
Full Name of Payee	Date of Public Distribution/Dissemination
Old Towne Media Date of Dissemination: 10/19/16	10 19 2016
Mailing Address 4507 Penwood Or	Amount
	Sections: and are because a softener is confined in the
City State Zip Code	48000.00
Alexandria VA 22310	Transaction ID : SE-952383 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Catogory/ Type O04	10 18 2016
Name of Federal Candidate Support Off	lice Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
	sbursement For: Primary General
Per Election for Office Sought 2742321.20 201	16 Other (specify) ▶
Full Name of Payee AL Media, LLC Date of Dissemination: 10/19/16	Date of Public Distribution/Dissemination
Mailing Address 222 West Ontario Wost	The second framework
Sulte 600	Amount
City State Zip Code	81321.00
Chicago IL 60654	Transaction ID : SE-952867 Date of Disbursement or Obligation
Purpose of Expenditure Modia Buy Collegory/ Type Collegory/ Type	10 14 2016
Name of Federal Candidate Support Off	lice Sought: House District: 00
Donald J. Trump	President Senate State:
Calendar Year-To-Date 1 2742321.20 Dis	
the first the state of the stat	Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	129321.00
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	273146.39
Under penalty of perjury I cortify that the independent expenditures reported herein were not rewith, or at the request or suggestion of, any candidate or authorized committee or agent of elitiparty committee) any political party committee or its agent.	rnade in cooperation, consultation, or concert ner, or (if the reporting antity is not a political
Kelly C. Ward	10 21 2016
Signature Date	10 : 7 21 1 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 48 OF 60
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C c00000935
Check if 24-hour report	on [21 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Full Name of Payee Screen Strategies Media, LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/24/16	10 24 2016
Mailing Address 11150 Fairtax Blvd	Amount
Suite 505	the second property special sp
City State Zip Code Fairfax VA 22030	45000.00 Transaction ID : SE-952072 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004 3	10 17 2016
Name of Federal Candidate Support Office	Sought: House District: 00
tion of the second seco	President Senate State:
Calendar Year-To-Date Per Election for Office Sought Oisbu 2016	rement For: Primary General Other (specify)
Full Name of Payee AL Media LLC Date of Dissemination: 10/24/16 Mailing Address 222 W Ontario St	Oate of Public Distribution/Dissemination
Suite 600	
City State Zip Code Chicago IL 60654	Transaction ID : SE-953187 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type Type	10 21 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump Signature (Signature)	President Senate State:
Calendar Year-To-Date Per Election for Office Sought Disbut 2016	Irsement For: Primary General Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	176250,00
(b) SUBTOTAL of Unitemized Independent Expenditures	The second secon
(c) TOTAL Independent Expenditures	
Under penalty of porjury I certify that the independent expanditures reported herein were not ma with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	de in cooperation, consultation, or concert , or (if the reporting entity is not a political
Kelly C. Ward Date 10	25 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURE	
(Schedule E)	PAGE 51 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER Y
DCCC '	[C] C00000935
Check If 24-hour report 48-hour report New report	Amends report filed on
Full Name of Payse AL Media LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/25/16 Mailing Address 222 W Ontario St	10 25 2016
Suile 600	Amount
City State Zlp Code	e 9000.00
Chicago IL 60854	Transaction ID : SE-953228 Date of Disbursement or Obligation
Purpose of Expenditure Modia Buy Catago Ty	ory 004 1 10 24 2016 7
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 4369947.93	3 2016 ,
Full Name of Payeo	
Canal Partners Media, LLC Date of Dissemination; 10/25/16	Date of Public Distribution/Dissomination
Mailing Address 25 Whitlock Place	Amount
Suite 200	Autofut
City State Zip Code Marietta GA 30064	Transaction ID : SE-952497
Purpose of Expanditure	Date of Disbursement or Obligation
Marila Sun	pe 004 10 19 2016
Name of Fedoral Candidate	Support Office Sought: House District: 00
Donald J. Trump	Oppose President Senato State:
Calendar Year-To-Date Por Election for Office Sought 436994	7.93 Disbursement For: Primary General
$p \rightarrow 1 d_{r} - 3$	Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	193082.00
(b) SUBTOTAL of Unitomized Independent Expenditures	
•	
(c) TOTAL Independent Expenditures	a contraction of the same
Under penalty of perjury I certify that the independent expenditures reported with, or at the request or suggestion of, any candidate or authorized committee party committee) any political party committee or its agent.	herein were not made in cooperation, consultation, or concert se or agent of either, or (If the reporting entity is not a political
Kelly C. Word	Date 10 , 25 2016 }
Signature	

24/48 HOUR REPORT OF INDEPENDENT EXPENDITU! (Schedule E)	PAGE 23 OF 23
	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
	C c00000935
Check If 24-hour report 48-hour report Now report	Amends report (iled on
Full Name of Payer Moore Campaigns, LLC	Date of Public Distribution/Dissemination
Mailing Address 447 Irving St, NW	10 28 2016 Amount
Chi.	Codo 4472.36
City State Zip C Washington DC 200	ورارية والأربيب المرسولين والمروان والمراج المراج المراج المراج المراجع المراج
Purpose of Expenditure Mall Services Cat	alegory/ Type 008 10 27 2016
Name of Federal Candidato	Support Office Sought: House District: 00
Donald J. Trump	Oppose President Senate State:
Per Flection In Olice Sought 459358	Disbursoment For: Primary Goneral 2016 Other (specify)
Full Name of Payee AL Media LLC	Deto of Public Distribution/Dissemination
Mailing Address 222 W Ontario St Suito 600	Amount
	Code 30525.00
Chicago IL 606	مساله بدالهم فيستخر بيوا فيستجرب إذرجا إشهاجه بغوه بالادراج
Purpose of Expenditure Media Buy	regory/ 004 10 26 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 (459	03586.81 Disbursement For: Primary General 2016 Other (specify) ▶
	apply to the control of the page of the page of the control of the
(a) SUBTOTAL of Itemized Independent Expenditures	34997.36
(b) SUBTOTAL of Unitemized Independent Expenditures	and be a second
(c) TOTAL Independent Expenditures	1588663.18
Under penalty of perjury I cortily that the independent expenditures report with, or at the request or suggestion of, any condidate or authorized company committee) any political party committee or its agent.	orted herein were not made in cooperation, consultation, or concert immittee or agent of either, or (if the reporting antity is not a political
Kelly C. Ward	Date 10 29 2016
Signature	i linkani

nage# 201610319037014651 4/48 HOUR REPORT OF INDEF ichedule E)	'ENDENT EXPEN	IDITURES		PAGE 7	OF 8 F FORM 24/48
AME OF COMMITTEE (In Full)			F	FEC IDENTIFICATION	
				C c00000935	
heck If X 24-hour report 1 48-hour	report New	report Amends repo	ort filed on	[[DT b] '	
Full Name of Payee Adelstein & Associates LLC Date of Disse) emination: 10/31/16		177	Public Distribution	/Dissemination 2016
Mailing Address 222 West Ontario Stree			Amount	السفسا است	2010
City	State	Zip Code		**************************************	80000.00
Chicago	IL	60654		ction ID : SE-9543	
Purpose of Expenditure Media Buy	•	Category/ Type 004		10 28	2016
Name of Federal Candidate Trump, Donald, J., ,		Support M Oppose	Office Sought:		District: 00 State:
Calendar Year-To-Date Per Election for Office Sought		4979620.65	Disbursement 2016 Oth	For: Primary	y X General
Full Name of Payee Adelstein & Associates LLC Date of Diss	semination: 10/31/16		1 1	Public Distribution	n/Dissemination 2016
Malling Address 222 West Ontario Str	eet, Suite 600		Amoun		
City	State	Zip Code		A 411-4-1-43	67387.50
Chicago	IL	60654		tion ID : SE-95437 Disbursement or	
Purpose of Expenditure Media Buy		Category/ 004	1 1 1 1	10 28	2016
Name of Federal Candidate		Support	Office Sought:	: House	District: 00
Trump, Donald, J., ,		X Oppose	¥ Presider	<u> </u>	State:
Calendar Year-To-Date Per Election for Office Sought		, 4979620.65	Disbursement 2016 Ott	For: Primary	y 🗶 Genera
(a) SUBTOTAL of Itemized Independent				Ar	147387.50

Under	penalty	of perjury	1 certify	that the	independent	expenditures	reported	herein	were	not made	e in	cooperation,	consultatio	n, o	r concert
with, c	or at the	request o	r suggesti	lon of, a	ny candidate	or authorized	committe	e or a	gent o	f either, d	or (ii	í the reportin	g enlity is	not a	ı political
party	committe	e) any po	litical part	y comm	lttee or its ag	ent.		•							

(c) TOTAL Independent Expenditures.....

Ward, Kelly, C., ,	[Electronically Filed]	Date	10	′	31	′	2016
Signature			<u> </u>		أسمعيسا	1	أسكيسانين ويسا

24/48 HOUR REPORT OF INDEPENDEN (Schedule E)	T EXPEND	ITURES		PAGE 51 OF 52 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC				FEC IDENTIFICATION NUMBER ▼ C C00000935
Check if [24-hour report	X New rep	ort ; Amends repo	ort filed on	M 20 10 4 11 11 11 11 11 11 11 11 11 11 11 11 1
Full Name of Payer Screen Strategies Media, LLC Date of Dissemination: 1	0/18/16		Da	le of Public Distribution/Dissemination
Suite 505			Arr	nount
City	State	Zip Code		134898.50
Fairlex	VA	22030	Tra Da	ensaction ID : SE-952377 te of Disbursement or Obligation
Purpose of Expenditure Media Buy		Calegory/ Type 004		10 11 2016
Name of Federal Candidate		Support	Office Sou	ught: ! House District: 00
Donald J. Trump		🔀 Оррозе	X Pres	sident Senale State:
Calendar Year-To-Date Fer Election for Office Sought	, , , , 26	513000.20	1 2016	nent For: Primary X General Other (specify)
Full Name of Payee Kully Hall, LLC Date of Dissemination: 1 Mailing Address 1932 1st Ave, Suite 203	0/18/16		. Da	ne of Public Distribution/Dissemination
			. An	nouni .
City Scattle	Siato WA	Zip Code 98101		6225,00 nsaction ID : SE-952379 tile of Disbursement or Obligation
Purpose of Expanditure Media Buy Media Production	· 	Category/ Type		10 18 2016
Name of Foderal Candidate		Support	Office Sou	ught: House District: 00 -
Donald J. Trump		X: Oppose	agramatic and the put to	sideni - Senate State:
Calendar Year-To-Date Por Election for Office Sought	, 1	2613000.20	1 2010	nent For: Primary X General Other (specify) •
(a) SUBTOTAL of Itemized Independent Expenditure	s		·· >	, 141123.50
(b) SUBTOTAL of Uniternized Independent Expenditu	ures	***************************************	• •	
(c) TOTAL Independent Expenditures			" >	
Under penalty of perjury I certily that the independe with, or at the request or suggestion of, any candidal party committee) any political party committee or its	te or authorized	reported herein were I conmittee or agent o	not made in of either, or	n egoperation, consultation, or concert (if the reporting entity is not a political
Kelly C. Ward		. Date	, 10	19 2016
Signature				

24/48 HOUR REPORT OF INDEPENDEN (Schedule E)	T EXPE	NDITURES			PAGE 48	
NAME OF COMMITTEE II. F. III.				,	FOR SE O	F FORM 24/48
NAME OF COMMITTEE (In Full) DCCC		•		FEC I	IDENTIFICATI	ON NUMBER T
2000	•			C	C00000935	
Check if 24-hour report 248-hour report	X New	report , 1 Amends rep	ort filed on	n. 1)		* * * *
Full Name of Payee Screen Strategies Media, LLC				of Publ		/Dissemination
Date of Dissemination: 1	0/24/16			10	, 24	2016
Mailing Address 11150 Fairfax Blvd Suito 505			Amor	unt		
City	State	Zip Code				45000.00
Fairfax	VA .	22030			ID : SE-9520 ursement or (72
Purpose of Expenditure Media Buy		Calegory/ 004		10	r 0- 0 17	2016
Name of Federal Candidate		Support	Office Sough		House	District: 00
Denald J. Trump		X Oppose	1		Senate	State:
Calendar Yoar-To-Dato Per Election for Office Sought		3653174:61	Disbursemen 2016	nı For:	Primary	General
	,	* *				
Full Name of Payee AL Media LLC Date of Dissemination: 16	0124118		Date	of Publi	ic Distribution	/Dissemination
Mailing Address 222 W Ontario St	0/2-1/10			10	24	2016
Suite 600			Amo	ומנ		
Cily	State	Zip Code				131250.00
Chicago	II.	60654			D : SE-95318' wsement or (
Purpose of Expenditure Media Bury		Category/ 004	Ì	10"	21	2016
Name of Federal Candidate	•	Support	Office Soug	hi:	House	District: 00
Donald J. Trump		X Oppose	Presid			State:
Calendar Year-To-Date Per Election for Office Sought	;	3653174.81	2016		Primary	General
(a) SUBTOTAL of Itemized Independent Expenditure	· · · · ·			, , , , , , , , , , , , , , , , , , ,	podity) -	176250.00
(b) SUBTOTAL of Uniternized Independent Expenditu	ıres	······································	· •			
(c) TOTAL Independent Exponditures			" >		,	
						
Under penalty of perjury I certify that the independer with, or at the request or suggestion of, any candidat party committee) any political party committee or its a	e or authori	res reported herein were zed committee or agent o	not made in o of either, or (if	:ooperal the rep	ilon, consulta orting entity is	tion, or cencert s not a political
Rette C. Ward	•	- .		25	, 20:	, e
Signature		Date	10	23	201	U

24/48 HOUR REPORT OF INDEPEND (Schedule E)	ENT EXPEN	IDITURES		PAGE 52 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			1 _	CIDENTIFICATION NUMBER V
			C	, C00000935
Check if 24-hour report 48-hour report	X New	report Amends rep	ort filed on	. बट रेड्र ४ व
Full Name of Payer Screen Strategies Media, LLC			1	ublic Distribution/Olssemination
Date of Dissemination Mailing Address 11150 Fairfax Blvd	n: 10/25/16		10	25 2016
Suite 505			Amount	
City	State	Zip Code		. 64326.00
Fairlox	VA	22030		on ID : SE-953184 isbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10	21 2016
Name of Federal Condidate		Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	X President	Senate State:
Calendar Year-To-Date	······································			r: Primary X General
Por Election for Office Sought	1	_, 4369947.93	2016	(spedíý) ►
Full Name of Payee				ublic Distribution/Dissemination
Buying Time, LLC Date of Dissemination			1 -	1 2 5 . 7
A 4 - N		<i></i>		25 2016
Mailing Address 650 Massachusetts Avenue, Suite 210	MAA		Amount	
City	State	Zin Code		62488.00
Washington	DC	20001		n ID : SE-953185 isbursement or Obligation
Purpose of Expenditure Media Buy	•	Category/ Type 004	10°	21 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	:X President	
Calendar Year-To-Date Per Election for Office Sought		4369947,93	Disbursement Fo. 2016 Otner	r: Primary General
			1 Onter	(apealy) -
(a) SUBTOTAL of Itemized Independent Expend	itures		to: 🕨	126814.00
				• • • •
(b) SUBTOTAL of Unitemized Independent, Expe	ndilures		·· •	
(a) YOYAL ladanadani Sunaudiyuna				
(c) TOTAL Independent Expenditures			·· •	,
Under penalty of perjury I certify that the independent or at the request or suggestion of, any campany committee) any political party committee or	didate or authoriz	es reported herein were ted committee or agent o	not made in coope of either, or (if the r	eration, consultation, or concert operating ontity is not a political
Kelly C. Ward				, , , , ,
Signature		. Date	10 2	5 2016

/48 HOUR REPORT OF INDEPI	ENDENT EXPEND	DITURES		PAGE 8 OF 8
chedule E)				FOR SE OF FORM 24/48
ME OF COMMITTEE (In Full)			FEC II	DENTIFICATION NUMBER V
ccc			C	C00000935
			; C	
eck II 💢 24-hour report 48-hour re	eport X New rej	port Arnends repr	ort filed on	n 2 v , , ,
Full Name of Payee Screen Strategies Media, LL	C nination: 10/31/16		Date of Public	Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd	10101110			31 2016
Suite 505			Amount	
City	State	Zip Code		55000,00
Fairlax	· VA	22030	Transaction I	ID : SE-953293 Irsement or Obligation
Purpose of Expenditure Media Buy	to the second se	Calegory/ Type 004	1	25 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump	•	'X' Oppose		: Senate Slate:
Calendar Year-To-Date			Disbursement For	Primary X General
Per Election for Office Sought	; 4	979620.65	2016 Other (sp	
Full Name of Payee				c Distribution/Dissemination
AL Media LLC			1	31 2016
Matthew Address	nination: 10/31/16			31 2016
EZZ W GINBIO GI			Amount	
Suite 600	State	Zip Code		115875.00
Chicago	IL.	60654	Transaction III Date of Disbu	
Purpose of Expenditure Media Buy		Category/ Type 004	″10 ^{''}	27 2016
Name of Federal Candidate	.4	Support	Office Sought:	House District: 00
Donald J. Trump		:X, Oppose	X President	Sonate Sizie:
Calendar Year To-Date Per Election for Office Sought		4979620.65	Disbursement For:	Primary X Genera
To design of once books	, ,	<u> </u>	: Other (sp	pecily) >
(a) SUBTOTAL of Itemizod Independent E.	xpenditures		·· >	170875.00
(b) SUBTOTAL of Unitemized Independent	Evanodituras			
10) 305 101AL OF CHILERIZED INCEPENDENT	· Experiences	***************************************	" ▶	r
(c) TOTAL Independent Expenditures				433711.75
Liperial in Capacitation Committee			•	, 433711.73
Under penalty of perjury I certify that the invith, or at the request of suggestion of, an party committee) any political party committee.	ry candidate or authorized	s raported herein were d committee or agent o	not made in cooparat of either, or (if the repu	ion, consultation, or concert orling entity is not a political
Kelly C. Ward				
		Date		2016
Signature				

_	₁ e# 201611049037121060 18 HOUR REPORT OF INDEP	PENDENT EXPEN	DITURES		
	nedule E)	3 . 1. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.			PAGE 10 OF 11
NAM	IE OF COMMITTEE (In Full)				FOR SE OF FORM 24/48
	CCC				EC IDENTIFICATION NUMBER V
				15	C C00000935
	ck II 🗶 24-hour report 🔲 48-hour	report 💉 New re	eport Amends repo	ort filed on	J. Local . Leavening
		LC emination: 11/04/16		1 .	Public Distribution/Dissemination
	Malling Address 11150 Fairfax Blvd			Amount	and hadraid barramanal
1-	Suite 505	Piata	Tir Orda		- 2000 00
ı	City Fairfax	State VA	Zip Code 22030		tion ID : SE-954176 Disbursement or Obligation
	Purpose of Expenditure Media Buy		Category/ 004	Date of	المنتخبين فيارا لمودوا البار
17	Name of Federal Candidate		Support	Office Sought:	House District: 00
	Trump, Donald, J., ,		× Oppose	★ President	Senale State:
	Calendar Year-To-Date Per Election for Office Sought	المدود من المدود المدو	6419383.70	Disbursement F	For: Primary General er (specify) ▶
	Full Name of Payee	•		Date of	Public Distribution/Dissemination
	AL Media LLC Date of Disse	emination: 11/04/16		17.7	1 04 2016
17	Mailing Address 222 W Ontario St			نا ├─	المستندا المتنسما
	Suite 600			Amount	
1-	Clty	Slate	Zip Code	—— J	3750,00
	Chicago	IL	60654		ilon ID : SE-954988 Disbursement or Obligation
	Purpose of Expenditure Media Buy		Category/ 004		
- 1	Name of Federal Candidate Trump, Donald, J., ,		Support K Oppose	Office Sought:	House District: 00
-			L Opposo		
	Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbursement F 2016 Othe	For: Primary General er (specify) ▶
	a) SUBTOTAL of Itemized Independent	•		familians familians	43750.00
(0	b) SUBTOTAL of Unitamized Independe	nt Expendituros	.**1,23,23,004,11,41,000,000,000,000,000,000,000,0	" >	
(0	c) TOTAL Independent Expenditures			* >	
wi	nder penalty of perjury I certify that the ith, or at the request or suggestion of, a arty committee) any political party comm	any candidate or authorize	es reported herein were ded committee or agent c	not made in coo	operation, consultation, or concert a reporting entity is not a political
	Ward, Kelly, C., ,	/Electr	ronically Filed Date	117 1	04 2016
	Signature			*	manual functional

	ge# 201611049037121059 /48 HOUR REPORT OF INDE	PENDENT EXPE	NDITURES		•		·
	chedule E)					PAGE 9	OF 11 F FORM 24/48
NA	ME OF COMMITTEE (In Full)		<u> </u>		1550.15		
	CCC				he dan	- Agrandar	ION NUMBER ▼
_		· · · · · · · · · · · · · · · · · · ·	·			C00000935	
Ch	eck if X 24-hour report 48-hour	report 💉 🗷 Ne	w report Amends	s report file	d on	()	Against and a
	Full Name of Payee Screen Strategies Media, L Date of Diss	LC emination: 11/04/16			Date of Public	Distribution 04	n/OlssemInation
	Mailing Address 11150 Fairfax Blvd	- •			Amount	أستنسأ	
	Suite 505					منامس دگندستا ب	
	City Fairfax	, State VA	Zip Code 22030		Transaction I Date of Disbu	D : SE-9548	13000.00 382 Obligation
	Purpose of Expenditure Media Buy		Category/ Type	004	11.	03	2016
	Name of Foderal Candidate		Supp	ort Offic	e Sought	House	District: 00
	Trump, Donald, J., ,	•	Ж Орро	i	President	Senale	State:
	Calendar Year-To-Date Per Election for Office Sought	and and the death	6419383.70	Disb 2016	oursement For: Other (sp	Primar	y 🗶 General
	Full Name of Payee		·		Date of Public	Distribution	n/Dissemination
	The New Media Firm, Inc. Date of Diss	emination: 11/04/16			11	04	2016
	Mailing Address 1730 Rhode Island A	ve., NW	· · · · · · · · · · · · · · · · · · ·		[museum]	استسا	لسسسا
	Suite 213	•			Amount		
	City	State	Zip Code				46000.00
	Washington	DC	20036		رفسفسودسك Transaction II Date of Disbu		
	Purpose of Expenditure Media Buy	•	Calegory/ Type	004	11	03	2016
	Name of Foderal Candidate		Supp	oort Offic	ce Sought:	House	District: 00
	Trump, Donald, J., ,		K Oppe	ose K	President [Senate	State:
	Calendar Year-To-Date Per Election for Office Sought	San	6419383.70	Dist 201	bursement For: 6 Other (sp	Primar	ry 🗶 Goneral
Г					Photosoppe to any		
	(a) SUBTOTAL of Itemized Independent	Expenditures		········ >	and the state of the	والتصادمان	59000.00
	(b) SUBTOTAL of Unitermized Independent	ent Expenditures		········· >	من السنسية	anganagan managanagi	
	(c) TOTAL Independent Expenditures			······· >	and handson's	naponapanapan polinapanapan	
1	Under penalty of perjury I certify that the with, or at the request or suggestion of, party committee) any political party committee.	any candidate or author	itures reported herein orized committee or a	were not n gent of eith	nade in cooperat er, or (if the repo	lon, consulta	ation, or concert is not a political
	Ward, Kelly, C., ,	/El	ectronically Filedf	Date	11 04	20	116
	Signature	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			حسا لسم	سنسا ا	أستنسف

lmage# 201612089039916524

SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

EMIZED INDEPENDENT EXPENDITURES	•					024 OF 109107. 24 OF FORM 3X
IAME OF COMMITTEE (In Full)				EEC	~	ION NUMBER V
DCCC				[_		•
				C	C0000093	5
Check if 24-hour report , 48-hour report	New rep	orl Amends repo	bslit ho	on	-	
Full Name of Payee Screen Strategies Media, LLC		, Memo	Itam	Date of Publ	ic Distributio	n/Dissemination
Date of Dissemination: 11/07/16 - 24 hours prior to	election day			11	07'	2016
Mailing Address 11150 Fairtax Blvd			1	Amount		
Suile 505	1 01-1-	1 7 0 4				20172 50
City	State	Zip Code 22030		Transaction	ID - 85-9546	38173.50
	1	22030		Date of Disb		
Purpose of Expenditure Media Buy		Category/ Type 004	.	11	01	25!8
Name of Federal Candidate:		Support	Office	Sought:	House	Olstrict:
Trump, Danald, J., ,		x Oppose	×	President	Senate	State:
Calendar Year-To-Date Per Election for Office Sought		6693372.69	Disbu 2016	rsement For:	•	,
Cat Name of Co.			<u> </u>			n/Dissemination
Full Name of Payed The New Media Firm, Inc. Date of Dissemination: 11/01/16		Memo	itern	11		
Mailing Address 1730 Rhode Island Ave NW				•••	•	
Suite 213			Ī	Amount		
City	State	Zip Code				3568.00
Washington	DC	20036		Transaction Date of Disb		
Purpose of Expenditure Media Production		Category/ Type 004		11		2016
Name of Federal Candidate:		Support	Office	Sought:	House	District:
Trump. Donald, J., ,		x Oppose		-	Senate	State:
Calendar Year-To-Date				rsement For:		
Per Election for Office Sought	, :	6693372.69	2016	Oiner (s	pecily) >	<u> </u>
(a) SUBTOTAL of Itemized Independent Expenditures	5 4 ;		.			41739.50
(a) SUBTOTAL of Uniternized Independent Expenditu	#85. ₁₁		•	•	,	•
(a) TOTAL Independent Expenditures			>		•	
Under penalty of perjury I certify that the independ- with, or at the request or suggestion of, any candid pany committee) any political party committee or its	ate or authorized	reported herein were committee or agent of	not ma of either	de in coopera , or (if the rep	ition, consult porting entity	ation, or concert is not a political
Ward Keth, C.	/Electronically Fil	rull	_			
Signature	tour moments to	car Date	12	2 08	30)16
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24/48 HOUR REPORT OF INDEPENDE	ENT EXPEN	DITURES	PAGE 51 OF 52
(Schedule E)			FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			FEC IDENTIFICATION NUMBER *
DCCC			C C00000935
Check if 24-hour report 248-hour report	X New (report : Amends repo	ort filed on
Full Name of Payer			Date of Public Distribution/Dissemination
Screen Strategies Media, LLC. Date of Dissemination	n: 10/18/16		10 18 2016
Malling Address 11150 Fairfax Blvd			Amount
Suite 505			
City	State	Zip Code	134898.50
Fairlex	VA	22030	Transaction ID.: SE-952377 Date of Disbursoment or Obligation
Purpose of Expenditure Media Buy		Category/ Type C04	10 11 2016
Name of Federal Candidate .		Support	Office Sought: House District: 00
Donald J. Trump		X Oppose	President Senale State:
Calendar Year-To-Date			Dishureament For Primary IV Canoral
Per Election for Office Sought	. 1	,2613000.20	2016 Other (specify)
Full Name of Payee Kully Hall, LLC Oale of Dissemination			: Date of Public Distribution/Dissemination
Uale of Disseminatio	n: 10/18/16		10 18 2016
Mailing Address 1932 1st Ave. Suite 203			Amouni
City	State	Zip Code	6225,00
Soatile	WA	98101	Transaction ID : SE-9\$2379 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type	102 18 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	,	2613000.20	Olsbursement For: Primary General 2016 - Other (specify)
		····	
(a) SUBTOTAL of Itemized Independent Expendi (b) SUBTOTAL of Uniternized Independent Expe			
	nditures		•
(b) SUBTOTAL of Uniternized Independent Expe	nditures		•
(b) SUBTOTAL of Uniternized Independent Expendent (c) TOTAL Independent Expenditures	andent expenditure	res reported herein were	•
(b) SUBTOTAL of Uniternized Independent Expendent (c) TOTAL Independent Expenditures Under penalty of perjury I contify that the Independent in Suggestion of Surgestion of Surge	andent expenditure	res reported herein were	not made in cooperation, consultation, or concert

	48 HOUR REPORT OF INDEP	ENDENT EXPENDI	TURES			
(Sc	hedule E)				PAGE 3 OF FORM 24/4	3 8
	ME OF COMMITTEE (In Full)	·····			FEC IDENTIFICATION NUMBER	
ט	CCC				C c00000935	
					السيالسيليمة بسه جناب المساسية	<u> </u>
Che	eck it 24-hour report 1 48-hour	report X New repo	ort [] Amends repo	ort filed on	Charles Comments	
1	Full Name of Payee Buying Time, LLC			0	Date of Public Olstribution/Olsseminstic)rı
1		mination: 10/11/16			10 11 2016	٨٠.
I	Mailing Address 650 Massachusetts Ave	nua, NW			Tracker is messerous figures about	. 1
	Suite 210			,	ong danan Sung danah danan Sun sidan salah s Junonul	إسم
ľ	City	Stato	Zip Code		57500.00	
	Washington	DC	20001		ransaction ID : SE-951439 Date of Disbursement or Obligation	
	Purpose of Expenditure Media Buy		Cutogory/ 004		10 11 2016	A.!
ľ	Name of Federal Candidate		Support	Office So	ought: House District: 0	0
	Trump, Donald, J., ,		X Oppose		resident Senate State:	
ľ	Calendar Yoar-To-Date	he also rate a relational months and a con-		Dishusa	ment For: Pilmary X Gen	oral
١	Per Election for Office Sought	ر المستبدات المستبدات الم	1459931.62	2016	Other (specify)	ĺ
ľ	Full Name of Payee				Date of Public Distribution/Dissemination)n
	Screen Strategies Media, LLC	; mlnation: 10/12/16			10 12 2016	777
1	Mailing Address 11150 Fairfax Blvd	mindedi. Tortz to			10 1 12 1 2016	
ı	Sulte 505	•		A	Aniount	
١	City	State	Zip Code	[74632.00	7
1	Fairfax	VA	22030		ansaction ID: SE-951438 Date of Disbursement or Obligation	ايسما
ľ	Purpose of Expenditure		Category/	-7	Charles & Specifie & Specified	rviji
ı	Media Buy		Typo 004	ا (د.	10 11 2016	١.]
ľ	Name of Federal Candidate		Support	Offico S	ought: House District: 0	0
١	Trump, Donald, J., ,		Oppose	X Pr	resident Senate State:	
ľ	Calendar Year-To-Date	h is amount after the	- mark marchants	Disburse	ement For: Primary X Gen	eral
	Per Election for Office Sought	المراجعة المسلسلة المسلسلة المسلمة الم	1534583.62	2016	Other (specify) >	
(B) SUBTOTAL of Itemized Independent (Expendituros		>	132132.00	
					namen in the Committee of the State of the S	
(b) SUBTOTAL of Unitemized Independen	t Expenditures		·	nation de la 1886 automorphis préférant automobile : En 1	
(c) TOTAL Independent Expenditures			• [170032.00	
٧.	inder penalty of perjury I certify that the rith, or at the request or suggestion of, a arty committee) any political party comm	ny candidate or authorized	reported herein were committee or agent o	not made f either, o	In cooperation, consultation, or concerdit the reporting entity is not a politic	ert' cal
	Ward, Kelly. C., .			્ય હ	a company of the second	
	Signature	/Electroni	cally Filed Date	10	, 13 (2016	

	I/48 HOUR REPORT OF INDEPENDE chedule E)	ENT EXPEND	NTURES		PAGE	17 OF 17 SE OF FORM 24/48
	AME OF COMMITTEE (In Full)					ICATION NUMBER V
Сн	heck if 24-hour report 48-hour report	New re	port Amends rep	on tiled	in a sinor	*
	Full Name of Payoe Screen Strategies Media, LLC Date of Dissemination	n: 10/20/16			Date of Public District	oution/Dissemination
	Mailing Address 11150 Fairfax Blvd .				Amount	ا به استاس است
	Suite 505				21 Pupa-da	
	City Fairfax	State VA	Zip Coda 22030		Transaction ID : SE- Date of Disbursemen	952389
	Purpose of Exponditure Media Buy		Catogory/ 1004	-		2016
•	Name of Federal Candidate		Support	Office	e Sought: Hous	se District: 00
	Donald J. Trump		Oppose		President Sens	ate State:
	Calendar Year-To-Date Por Election for Office Sought	, , , , , , , , , , , ,	2989611.20		ursemont For: Pr	· · · · · · · · · · · · · · · · · · ·
	Full Name of Payee AL Media LLC Date of Dissemination	n: 10/20/16			Date of Public Distrib	
-	Mailing Address 222 W Onterio St				Amount	
	Suite 600	State	Zip Code		•	140250.00
	Chicago	IL	60654		Transaction ID : SE-9 Data of Disbursemen	52071
	Purpose of Expenditure Media Buy		Calegory/ 004		. 10 17	
	Name of Federal Candidate		Support	Offic	e Soughl: [] Hou	se District: 00
	Donald J. Trump		i∑ Oppose		President Sen	ate State:
	Calendar Year-To-Date Per Election for Office Sought	امضاد ا	2989611.20	D(sb 2016	ursement For: Pi	
	(a) SUBTOTAL of Itemized Independent Expendi	ítures		··· •		247290.00
	(b) SUBTOTAL of Unitermized Independent Exper	nditures	·	·· >	•	•
	(c) TOTAL Independent Expenditures			·· >		652070.38
	Under penalty of perjury t certify that the independent, or at the request or suggestion of, any cand party committee) any political party committee or	didate or authorized	s repurted herein were d committee or agent o	not ma ot eithe	ade in cooperation, cor r, or (if the roporting e	isultation, or concert itity is not a political
	Kelly C. Word		Date	a 1		2016 · · · ·
	Signature					•

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	[5005 40 05 45]
(Schedule E)	PAGE 15 OF 15 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C C00000935
Check if 24-hour report 48-hour report New report Amends report file	יישר לי ב"נ"ם איר ואיר ed on
Full Name of Payee	Date of Public Distribution/Dissemination
Prism Communications, Inc. Date of Dissemination: 10/27/16	10 27 2016
Malling Address 1000 Potomac Street, NW	1
Suite 420	Amount
City State Zlp Code	3291.58
Washington DC 20007	Transaction 10 : SE-953927 Date of Disbursement or Obligation
Purpose of Expenditure Media Production Category/ Type 004	10 26 2016
Name of Federal Condidate Support Off	ice Sought: House District: 00
Donald J. Trump	Prosident Senato State:
	bursement For: Primary X General
	Other (specify)
Full Name of Payee	Date of Public Distribution/Dissemination
76 Words Corp.	THE WAY STATE ATT A WAY
Date of Dissemination: 10/26/16 Mailing Address 1121 5th St NW	10 26 2016
1121 001 01, 1111	Anount
Floor #1 City State Zip Code	5500.00
Washington DC 20001	Transaction ID : SE-954171 Date of Disbursement or Obligation
Purpose of Expenditure Category/	401.561778
Media Production . Odd Type	10 27 2016
Name of Federal Candidate Support Off	lice Sought: House District: 00
Oonald J. Trump . Significant Compose 12	President Senate State:
	sbursement For: Primary K General
Per Election for Office Sought 4436718.92 20	Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	8791.58
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Indopendent Expanditures	771178,77
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 eith party committee) any political party committee or its agent.	made in cooperation, consultation, or concert her, or (If the reporting entity is not a political
the state of the s	b 11 / 5 n - fr yr -y - grad
Signature	10 27 2016

24/48 HOUR REPORT OF INDEPENDENT (Schedule E)	r expendi	TURES		PAGE 22 OF 25
	·			FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC				IDENTIFICATION NUMBER ▼
			C,	C00000935
Check if 24-hour report 24-hour report	New repo	ort Amends repo	ort filed on	1 40 - 0 4 1 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4
Full Name of Payee Kully Hall, LLC			Date of Put	olic Olatribution/Oissemination
Date of Dissemination: 10 Mailing Address 1932 1st Ave. Suite 203	W12/16		10	12 1 2016
1832 131 AVG, GUILE 203			Amount	
City	State	Zip Code	 [!	4297.00
Seattle	WA	98101	Transaction Date of Dis	n ID : SE-951665 bursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type		14 2016
Name of Federal Candidato		Support	Office Sought:	House District: 00
Donald J. Trump		Oppose	President	Senate State:
Calendar Year-To-Date Por Election for Office Sought		21688.30	Disbursement For: 2016 Other (s	Primary General
Full Name of Payes The New Media Firm, Inc. Date of Dissemination: 10	J/12/16			blic Distribution/Dissemination
Mailing Address 1730 Rhode Island Avo., NW Suite 213			Amount	
Cily	State	Zip Code		56930.43
Washington	DC	20036		ID : SE-951666 bursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10.3	12 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		Oppose	X President	Senato State:
Calendar Year-To-Date Per Election for Office Sought	900 (1996) 1800 (1996)	1721668.30	Disbursement For: 2016 Other (Primary ⊠ General
(a) SUBTOTAL of Itemized Independent Expenditures	S.,		. * * * * * * * * * * * * * * * * * * *	61227.43
(b) SUBTOTAL of Unitermized Independent Expenditu	жеs		· •	• • • •
(c) TOTAL Independent Expenditures	***************************************	.,,,	•	a
Under penalty of perjury I certify that the independer with, or at the request or suggestion of, any candidat party committee) any political party committee or its a	e or authorized	reported herein were committee or agent o	not made in cooper if either, or (if the re	ration, consultation, or concert porting entity is not a political
Kelly C. Word		Date	u. v	2016
Signature		Date		4010

_{ge#} 201610149032527772 48 HOUR REPORT OF INDEPENI hedule E)	DENT EXPEN	IDITURES		PAGE 21 OF 25
				FOR SE OF FORM 24/48
ME OF COMMITTEE (In Full) CCC				FEC IDENTIFICATION NUMBER
ck if 24-hour report 28-hour report	X New	report Amends repo		- 1
Full Name of Payee The New Media Firm, Inc. Date of Disseminat	ilon: 10/12/16			of Public Distribution/Dissemination 10 12 2016
Mailing Address 1730 Rhode Island Ave., NW			Amou	
Suite 213		7-0-4-		nergangan pangangan pangangan Pangangan
City Washington	State	Zip Code 20036		4047.25 saction ID: SE-951654 of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type		10 12 2016
Name of Federal Candidate		Support	Office Sough	nt: House District: 00
Trump, Donald, J., ,			✗ Presid	lent Senate State:
Calendar Year-To-Date Per Election for Office Sought		1721688.30	Disbursemen 2016	nt For: Primary 🗶 General
Full Name of Payee Screen Strategies Media, LLC Date of Disseminal	tion: 10/12/16		1	of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd	, , , , , , , , , , , , , , , , , , , ,		Amoi	معيشيندا المتالسة استجس
Suite 505			;	
City Fairfax	State VA	Zip Code 22030		121850.00 action ID : SE-951660 of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004		M - M + 1 10 - 0 - 1 1 1 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7
Name of Federal Candidate		Support	Office Sough	ht: House District: 00
Trump, Donald, J., ,		X Oppose	× Presid	
Calendar Year-To-Date Per Election for Office Sought		1721688.30	Disbursement 2016	nt For: Primary General Other (specify)

(b) SUBTOTAL of Unitermized Independent Expenditures	•	
(c) TOTAL Independent Expenditures	•	1
Under penalty of perjury I certify that the independent expenditures reported herein were with, or at the request or suggestion of, any candidate or authorized committee or agent of	not ma	ade 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.

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Ward, Kelly, C., ,	[Electronically Filed]	Date	, 10 21	14 2016	Y
Signature					-

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24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

Schedule E)	PAGE 21 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C C00000935
Check if 24-hour report	d on 10 14 2016
I full Name of Paura	Consideration of the Constant
Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination
Mailing Address 1730 Rhode Island Ave., NW	Amount
Suite 213	
City State Zip Code Washington . DC 20036	4047.25 Transaction ID : SE-952372
Purpose of Expenditure Media Buy Media Production Category/ Type	Date of Disbursement or Obligation
Name of Federal Candidate Support Office	e Sought: House District: 00
Trump Donoid (President Senate State:
Calendar Year-To-Date Per Election for Office Sought Disb 2016	ursement For: Primary X General Other (specify) >
Full Name of Payee	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/12/16	10 12 2016
Malling Address 11150 Fairfax Blvd	Amount
Suite 505	A CONTRACTOR OF THE PROPERTY O
City State Zip Code Fairfax VA 22030	Transaction ID : SE-952373 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type O04	10 14 2016
Name of Federal Candidate Support Office	ce Sought: House District: 00
Trump, Donald, J.,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought Dist 201	oursement For:
(a) SUBTOTAL of Itemized Independent Expenditures	125897.25
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	American communication of contractions of the contraction of the contr
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	a in the second second

24/48 HOUR REPORT OF INDEPENDEN (Schedule E)	T EXPEND	ITURES	PAGE 3 OF 3
•			FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) OCCC		·	FEC IDENTIFICATION NUMBER ▼
			C C00000935
Check If 24-hour report 48-hour report	New rep	ort Amends repo	ort filed on
Full Name of Payee			Date of Public Distribution/Dissemination
Buying Time, LLC Date of Dissemination: 1	0/1 1/16		10 11 2016
Mailing Address 650 Massachusetts Avenue, NW			Amount
Suite 210			the stands of material advantages described
City	State	Zip Code	57500.00
Washington	DC	20001	Transaction ID : SE-951439 Date of Disbursoment or Obligation
Purpose of Expenditure Media Buy		Category/ 004	10 1 11 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	مبور ہے 14 معالات مد قدر 19	159931.62	Disbursement For: Primary General 2018
Full Name of Payee			Date of Public Distribution/Dissemination
Screen Strategies Media, LLC			المسائنك المعادات المتعادات
Date of Dissemination: 1	0/12/16		10 12 2016
THOU TAINAX SING			Amount
Suite 505			المراجد والمحمد والمحدد والمحدد
Clty Fairlex	Slate VA	Zip Code 22030	74632.00 Transaction ID : SE-951436
Purpose of Expenditure	·	Category/ 1 704	Date of Diabursement or Obligation
Modia Buy		Type 1 004	10 11 2016
Name of Foderal Candidate		Support	Office Sought: House District: 00
Donald J. Trump		Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought	•	1534563.62	Oisbursement For: Primary General 2016
,	, ,		Other (specily)
(a) SUBTOTAL of Itemized Independent Expenditure	s		132132.00
(b) SUBTOTAL of Uniternized Independent Expenditu	ıres		er bereite der Steine
			to a second with fine submidents
(c) TOTAL Independent Expenditures			170032,00
Under penalty of perjury I certify that the Independent with, or at the request or suggestion of, any candidal party committee or its a	e or authorized	reported herein were 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			
Signature		Dale	
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24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 50 OF 60
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER T
DCCC	C C00000935
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Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/25/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd	1 10 1 1 23 1 2010
Sulte 505	Amount
City State Zio Code	121850.00
Fairfax VA 22030	Transaction ID : SE-952388 Dato of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type Out Type Typ	10 18 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
	ursement For: Primary K General
Per Election for Office Sought 4369947.93 2016	Other (specify)
Full Name of Payee Buying Time, LLC Date of Dissemination: 10/25/16	Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Avenue, NW	Lastant Immund Immediant
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 Category/ Type O04 Type	10 24 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump Oppose	President Senste State:
Calendar Year-To-Dato Per Election for Office Sought 4369947.93 Disbut 2016	ursement For: ☐ Primery ☐ General ☐ Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	141541.00
(b) SUBTOTAL of Unitermized Independent Expenditures	The state of the s
(c) TOTAL Independent Expenditures	A second
Under penalty of perfury I certify that the Independent expenditures reported heroin were not may with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert r, or (if the reporting entity is not a political
Kelly C. Wurd Date 1	0 25 2016
Signature	The Base of the Base of the Company

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 57 OF 57
NAME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48
DCCC	FEC IDENTIFICATION NUMBER ▼
	C C00000935
Check If 24-hour report 48-hour report New report Amends report Ille	ed ou [n_n, n, n
Full Name of Payer Buying Time, LLC	Date of Public Distribution/Dissomination
Date of Olssemination: 11/01/16	11 01 2016
Mailing Address 650 Massachusetts Avenue, NW	Amount
Suite 210	her braders's retainment and
City State Zip Code Washington . DC 20001	77175.00 Transaction ID : SE-954373 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category Type 004	10 28 2016
Name of Federal Candidate Support Office	ce Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calendar Year-To-Date Por Election for Office Sought Disc	oursement For: Primary General
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/01/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Feirfax Blvd Suite 505	Amount
City State Zip Code	74850.00
Falriax VA 22030	Transaction ID : SE-954175 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Catogory/ Type 004	10 627 2016
Name of Federal Candidate Support Office	ce Sought: House District: 00
Donald J. Trump Oppose	President Scnate State:
Calendar Yoar To-Date Per Election for Office Sought Dist	oursement For: Primary ⊠ General 6 Other (specify) ▶
_ 	
(a) SUBTOTAL of Itemized Independent Expenditures	92025.00
(b) SUBTOTAL of Unitemized Independent Expenditures	The second secon
(c) TOTAL Independent Expenditures	14333615.05
Under penalty of perjury I certify that the independent expenditures reported herein were not me with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	
Kelly C. Ward	The first of a first terminal of
Signature Date (11 02 2016

Image# 201611059037127397 24/48 HOUR REPORT OF INDEF	DENDENT EYDEND	ITI IRFQ	
(Schedule E)	CHOCKI EXPEND	TONES	PAGE 11 OF 12 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			*
DCCC			FEC IDENTIFICATION NUMBER ▼ C C00000935
Check if X 24-hour report 48-hour	report New rep	ort Amends repo	ort filed on
Full Name of Payee Screen Strategies Media, L	LC emination: 11/05/16		Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd			had been been been
Suite 505			Amount
City	State	Zip Code	58700.00
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
Trump, Donald, J., ,		X Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		6526208.19	Disbursement For: Primary General 2016
	بذا لمطسطسة المطبسة المسالمين		Other (specify) >
Full Name of Payeo Canal Partners Media, LLC Date of Diss	semination: 11/06/16		Date of Public Distribution/Dissemination 11 06 2016
Mailing Address 25 Whitlock Place			hated lasted hatestand
Suite 200			Amount
City	State	Zip Code	7910.00
Marietta	GA	30064	Transaction ID: SE-954884 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004	11 03 2016 Y
Name of Fedoral Candidate	•	Support	Office Sought: House District: 00
Trump, Donald, J., ,		X Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		6648199.19	Disbursement For: Primary General Other (specify) ☐
			Cutor (specify)
(a) SUBTOTAL of Itemized Independent	Expenditures	•••••••••••••••••••••••••••••••••••••••	▶ 66610.00
(b) SUBTOTAL of Unitemized Independent	ent Expenditures		
(c) TOTAL Independent Expenditures			·· •
Under penalty of perjury I certify that th with, or at the request or suggestion of, party committee) any political party committee.	any candidate or authorized	reported herein were d committee or agent o	not made in cooperation, consultation, or concert of either, or (if the reporting entity is not a political
Ward, Kelly, C., .	[Electron	nically Filed Date	e 11 06 2016
Signature			Provident A Developed Provident August Augus

Image# 201610189033039653

(Schedule E)				PAGE 19 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER ▼
DCCC				C C00000935
			-	ארבהבהבהן י בהבהן י בייביון
Check if 24-hour report x 48-hour report	New rop	ort K Amends repo	ort filed	on 10 14 2016
Full Name of Payee Ralston Lapp Media, LLC				Date of Public Distribution/Dissemination
Date of Dissemination	n: 10/14/16			10 14 2016
Mailing Address 1054 31st Street, NW Suite 430				Amount
City	State	Zlp Code		12260.71
Washington	DC	20007		Transaction ID : SE-951677 Date of Disbursement or Obligation
Purpose of Expenditure Media Production		Calegory/ Type 004		10 / 14 / 2016
Name of Federal Candidate		Support	Office	Sought: K House District; 23
Hurd, William, , ,				President Senate State: TX
Calendar Year-To-Date Per Election for Office Sought		1648833.65	Disbu 2016	rsement For: Primary General Other (specify) ▶
Full Name of Payee Buying Time, LLC Date of Dissemination	on: 10/14/16			Date of Public Distribution/Dissemination
Malling Address 650 Massachusetts Avenue,	NW			Amount
Suite 210	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.,		× Oppose	×	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		1919459.68	Disbu 2016	rrsement For: Primary X General Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expend	fitures	***************************************	·· >	65260.71
(b) SUBTOTAL of Unitemized Independent Exp	enditures	.,,,	··· >	
(c) TOTAL Independent Expenditures			··· >	
Under penalty of perjury I certify that the indep with, or at the request or suggestion of, any car party committee) any political party committee or	ididate or authorize			
Ward, Kelly, C., . Signature	[Electron	nically Filed Date	. <u>C</u>	0 18 2016

Ward, Kelly. C., ,

Signature

E OF COMMITTEE (In Full)				FOR SE O	F FORM 24/48
			FEC	IDENTIFICATI	ON NUMBER
CCC			C	C00000935	
k il 24-hour report 🗶 48-hour re	eport X New	report Amends rep	ort filed on	1 0 8 9 1	
Full Name of Payee			Date of Pu	blic Distribution	/Dissemination
The New Media Firm, Inc.	mination: 10/18/16		10 10	18 18	2016
Mailing Address 1730 Rhode Island Ave.,	, NW		ـــا ا	لتبال	
Suite 213			Amount		
City	State	Zip Code		40.	3407.87
Washington	DC	20036	Transaction	on ID : SE-9523 sbursement or	82 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., .		Oppose	President	Senate	State:
			Disbursement For		
Calendar Year-To-Date Per Election for Office Sought		2613000.20	2016	(specify) ▶	y 🗶 Gener
Full Name of Payee	•		Date of Po	ublic Distribution	n/Dissemination
Buying Time, LLC Date of Disse	mination: 10/18/16		10	18	2016
Mailing Address 650 Massachusetts Av	renue, NW			لسسارك	-
Suite 210			Amount		-
City	State	Zip Code		-41\ - 2 - 2 - 40	83829.00
Washington	DC	20001		n ID : SE-95207 sbursement or	
Purpose of Expenditure		Category/ 00	ט פיינין וייי	المقدما الم	
Media Buy		Type 004		1 1	2016
Name of Federal Candidate		Support	Office Sought:	House	District: 00
Trump, Donald, J., ,		X Oppose		Senate	State:
			<u> </u>		
Calendar Year-To-Date			Disbursement Fo	r: Primar	y 💢 Gener

[Electronically Filed]

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24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 52 OF 60
NAME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48
DCCC (FEC	IDENTIFICATION NUMBER V
<u> </u>	C00000935
Check if X 24-hour report 48-hour report Now report Amends report filed on	10 7'0] [YTYTYY]
Carago Circinales Madia 11.C	الد Distribution/Dissemination
Date of Dissemination: 10/25/16 10 Mailing Address 11150 Fairfax Blvd	25 2016
Suite 505	
City State Zip Code	64326.00
	10 : SE-953184
Purpose of Expenditure Modia Buy Category/ Type: 064	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 4369947.93 Disbursement For: 2016	Wange
	ilic Distribution/Dissemination
Buying Time, LLC Date of Dissemination: 10/25/16	25 2016
Mailing Address 650 Massachusetts Avenue, NW	23 2010
Sulte 210	
City State ZIp Code	62488.00
Washington DC 20001 Transaction	ID : SE-953185 oursoment or Obligation
Purpose of Expenditure Media Buy Category/ Type Category/ Type Category/ 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 4369947.03 Disbursement For: 2016 Other (s	1) · 12V
(a) Characteristic of the control of	
(a) SUBTOTAL of Remized Independent Expenditures	120019.UU
(b) SUBTOTAL of Unitemized Independent Expenditures	
	's 'm what is should
(c) TOTAL Independent Expenditures	. 90
Under panalty of partury I certify that the independent expenditures reported berein were not made in coopera with, or at the request or suggestion of, any candidate or suffronted committee or agent of either, or (if the repearty committee) any political party committee or its agent.	ullon, consultation, or concert porting entity is not a political
Kelly C. Ward Onle 10 25	2016
Signature	· Landing in