4 PERKINSCOLE 700 13th Street, NW +1.202.654.6200 RECEIVED Suite 600 +1.202.654.6211 FEC MAIL CENTER Washington, D.C. 20005-3960 **PerkinsCoie.com** 2015 DEC 22 PM 4: 18 December 22, 2016 Jeff S. Jordan Assistant General Counsel Federal Election Commission ₹.E Office of Complaints Examination and Legal Administration çç 999 E Street, NW ŝ Washington, DC 20463 .de

## 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

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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."<sup>1</sup> 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.<sup>2</sup> These advertisements simply present a text book example of appropriately attributing expenditures under 11 C.F.R. § 106.1(a).

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

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

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

<sup>&</sup>lt;sup>1</sup> 11 C.F.R. § 106.1(a)(1).

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

<sup>&</sup>lt;sup>3</sup> See 11 C.F.R. § 100.16(a) (linking definition of "independent expenditure" to express advocacy).

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

The only factor that makes the resolution of these matters in any way complicated is the Complainant itself. As it has done before, FACT has flooded the Commission with fourteen complaints involving a wide array of respondents, in a clear effort to drain Respondents' resources and burden the Commission, with the ultimate effect of chilling speech and impeding the progress of other, non-frivolous enforcement matters.<sup>5</sup> FACT relied on a single news article to "support" its conclusory allegations and focused the entire Complaints on generic party hybrid advertising that never occurred. The Complaints even carelessly swept up two ads that were attributed entirely to the relevant House campaigns and paid for completely with campaign funds and with coordinated party expenditure authority.

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

### FACTS

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

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

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

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

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

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

These Complaints are about advertisements that the DCCC undertook in service of these multiple objectives. Supervised by a senior DCCC employee, DCCC staff worked with House campaigns to develop and produce the advertisements beginning with script development through the advertising buying phase.<sup>8</sup> 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.<sup>9</sup> Advertisements that included express advocacy against Donald Trump are discussed in MURs 7169, 7170, 7171, 7174, 7176, and 7182.<sup>10</sup>
- 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.<sup>11</sup> 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.<sup>12</sup>

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

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

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

<sup>&</sup>lt;sup>10</sup> The advertisement in MUR 7169 can be found here: <u>https://www.youtube.com/watch?v=7mb2DsowG00</u>. The advertisement in MUR 7170 can be found here: <u>https://www.youtube.com/watch?v=ulkmwN7ivMU</u>. The advertisement in MUR 7171 can be found here: <u>https://www.youtube.com/watch?v=LS-gU95vm9U</u>. The advertisement in MUR 7174 can be found here: <u>https://www.youtube.com/watch?v=e\_4kBjw8r-U</u>. The advertisement in MUR 7176 can be found here: <u>https://www.youtube.com/watch?v=e\_4kBjw8r-U</u>. The advertisement in MUR 7176 can be found here: <u>https://www.youtube.com/watch?v=WCx30bETyrE</u>. The advertisement in MUR 7182 can be found here:

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

<sup>&</sup>quot; See Exhibit B.

<sup>&</sup>lt;sup>12</sup> The advertisement in MUR 7172 can be found here: <u>https://www.youtube.com/watch?v=nwdljKSaFdQ</u>. The advertisement in MUR 7175 can be found here: <u>https://www.youtube.com/watch?v=CJCZwJ3tYXw</u>. The advertisement in MUR 7177 can be found here:

https://www.youtube.com/watch?v=7KxcnucjChU&feature=youtu.be. The advertisement in MUR 7178 can be found here: <u>https://www.youtube.com/watch?v=H1xNUxf-t80</u>. The advertisement in MUR 7179 can be found here: <u>https://www.youtube.com/watch?v=OpdIIznhrF4</u>. The advertisement in MUR 7188 can be found here:

https://www.youtube.com/watch?v=epFwW3WyQWo. For the advertisement in MUR 7177, the Colorado Democratic Party similarly split the costs of the advertisement with Carroll for Colorado on a time/space basis.

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

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

### LEGAL ANALYSIS

### The Costs of the Advertisements Were Properly Attributed Among Multiple I. Candidates According to the Benefit Reasonably Expected to Be Derived

### Commission rules clearly provide for attribution among multiple Α. 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."<sup>18</sup> 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."<sup>19</sup> The Commission has repeatedly and consistently applied this regulation when evaluating communications that refer to multiple candidates.<sup>20</sup> 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).<sup>21</sup> The portions of the broadcast communication that is dedicated to the legally

<sup>19</sup> Id.

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

<sup>&</sup>lt;sup>13</sup> The advertisement in MUR 7173 can be found here: <u>https://www.youtube.com/watch?v=Rrii1iNAc-1</u>, The advertisement in MUR 7187 can be found here; https://www.youtube.com/watch?v=8DN@EgLEECA. See Exhibit B. <sup>14</sup> See Exhibit A.

<sup>15</sup> Id.

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

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

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

In attributing the cost of a communication among multiple candidates, the Commission docs 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."<sup>23</sup> 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.<sup>24</sup> 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).<sup>25</sup>

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.<sup>26</sup> 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.<sup>27</sup> The Commission held that, while no less than 50% of the costs could reasonably be attributed to the one identified candidate, "it is appropriate to apply analogous 'space or time' principles set out in 11 C.F.R. 106.1(a)" and that "the benefit reasonably expected to be derived' by the clearly identified candidate should be

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

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

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

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

<sup>&</sup>lt;sup>27</sup> FEC Adv. Op. 2006-11 (Washington Democratic State Central Committee).

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

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

### B. Respondents attributed the advertisements correctly.

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

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<sup>&</sup>lt;sup>28</sup> Id. at 4.

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

Take, for example, the advertisement sponsored by the DCCC and Mowrer for Iowa at issue in MUR 7174.<sup>31</sup> 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.<sup>32</sup> 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, 3 seconds equally attributable to both the House race and Trump, and ends with 2 seconds dedicated to the disclaimer. The first 28 seconds of the advertisement were equally divided between the House race and Trump, the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion, and so the advertisement was attributed 50% to the Deacon campaign and 50% to Trump. The same methodology was used to attribute the ads generally, and the Complaints provide no basis to question Respondents' attribution.

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

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

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

<sup>&</sup>lt;sup>32</sup> Colleen Deacon, Unsettled, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0. <sup>33</sup> See Exhibit B.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

<sup>&</sup>lt;sup>38</sup> Dangerous for PA Women, YouTube (Oct. 20, 2016) at :20 ("Say No To Donald Trump & Brian Fitzpatrick"), 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-gU95vm9U; Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016) at :28 ("Vote No on Donald Trump and David Young"),

https://www.youtube.com/watch?v=g\_4kBjw8r-U; Suzanna Shkreli for Congress, Brags, YouTube (Oct. 14, 2016) at :22 ("Vote No on Donald Trump and Mike Bishop"), https://www.youtube.com/watch?v=WCx3ObETyrE; Bryan Caforio for Congress, *Stand Up*, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

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

<sup>&</sup>lt;sup>41</sup> 11 C.F.R. § 100.22.

action.<sup>342</sup> Even according to the Ninth Circuit, which has taken a very expansive approach to defining express advocacy:

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

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

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

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

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

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

KATKO: "I absolutely will support."

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

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

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

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

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

[DISCLAIMER].44

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

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

<sup>&</sup>lt;sup>44</sup> Colleen Deacon, Unsettled, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0.

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

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

TRUMP: We're going to build a wall.

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

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

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

WILL HURD: A wall absolutely makes sense.

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

[DISCLAIMER].45

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

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

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.<sup>46</sup>

### 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.<sup>47</sup>

Instead, the Complaints make the conclusory allegation that the advertisements were coordinated with HFA. However, such pure speculation cannot support a finding of a reason to believe. The Commission may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Act.<sup>48</sup> For claims of coordination, the Commission requires an even stronger showing: that Complainant provide "probative information of coordination."<sup>49</sup> 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.<sup>50</sup> 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.<sup>51</sup> The declaration of Michael Ian Russell, the DCCC's Deputy Executive Director and Political Director, is especially important.<sup>52</sup> 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

<sup>&</sup>lt;sup>46</sup> FEC Adv. Op. 1985-14 (DCCC) ("DCCC may report these expenditures as operating expenditures."). <sup>47</sup> See Exhibit A.

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

<sup>&</sup>lt;sup>49</sup> FEC Matter Under Review 5999, Factual and Legal Analysis (Dec. 15, 2008); see also FEC Matter Under Review 6059, Factual and Legal Analysis, at 6 (Feb. 3, 2009). <sup>50</sup> FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of

Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000). <sup>51</sup> See Exhibits A and C. <sup>52</sup> See Exhibit A.

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

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

### CONCLUSION

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

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

Very truly yours,

Mr. B.

Marc E. Elias Brian G. Svoboda Graham M. Wilson Rachel L. Jacobs

Enclosure

Counsel to:

DCCC

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

<sup>53</sup> Id.

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

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

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- 15 -

Exhibit A

### BEFORE THE

### FEDERAL ELECTION COMMISSION

### DECLARATION OF MICHAEL IAN RUSSELL

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

- 1. During the 2016 election, I worked for DCCC as Deputy Executive Director and Political Director. Through that position, I am familiar with the matters discussed herein. At no point during the 2016 election cycle did I serve as an employee, independent contractor, vendor, or agent of Hillary for America ("HFA").
- 2. As the Deputy Executive Director and Political Director of DCCC, I worked with, and supervised other DCCC employees who worked with, numerous House campaigns on television advertisements that mentioned Donald Trump. Specifically, I worked with (a) Santarsiero for Congress on the advertisement discussed in the complaint in MUR 7169; (b) Ruben Kiluen for Congress on the advertisement discussed in the complaint in MUR 7170 (c) Nelson for Wisconsin on the advertisement discussed in the complaint in MUR 7171 (d) Colleen Deacon for Congress on the advertisement discussed in the complaint in MUR 7172 (e) Applegate for Congress on the advertisement discussed in the complaint in MUR 7173 (f) Mowrer for Iowa on the advertisement discussed in the complaint in MUR 7174 (g) Texans for Pete on the advertisement discussed in the complaint in MUR 7175 (i) Shkreli for Congress on the advertisement discussed in the complaint in MUR 7176 (j) Carroll for Colorado on the advertisement discussed in the complaint in MUR 7177 (k) Eggman for Congress on the advertisement discussed in the complaint in MUR 7178 (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 DC:CC staff, I worked directly with each Campaign and advertising vendor to draft each script and produce and edit each Advertisement.

- 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 DC(C 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  $\frac{2}{2}$  /  $\frac{1}{2}$ 

icheel Ian Russell

- 2 -

# 11/044444236

Exhibit B

### lmage# 201612069039916605

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

PAGE 47529 OF 47535 FOR LINE 25 OF FORM 3X

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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

(To be used only	by Political Committees in the Gone	ral Election) FOR LINE 25 OF FORM 3X
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Has your committee been designated to make coordinated expenditures by a political party committee?	Full Name of Subordinate Committee	· · · · · · · · · · · · · · · · · · ·
If YES, name the designating committee: Democratic National Committee	Mailing Address 430 South Capitol S 2nd Floor	
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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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FEC Schedule F (Form 3X) Rev. 05/2018

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

PAGE 83515 OF 63518

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Washington		DC	:	20036		09	20	:	2016
Name of Federal Candidate Supported	Office	Sough	nt: 🗶	Hause	State: CA	Amount			
Applegate, Doug, Loren, .				Senate	District: 49				
				Presidential	I	4	•	, 9	1200.00
Aggregate General Election Expenditure for this Candidate >	. <sub>т</sub>	ransac	tion 10	91200	•				
Full Name (Last, First, Middle Initial) of					Memo Item	Purpose of	Expenditure	1	
Screen Strategies Med	lia, Ll	LĊ				Media S	ervices		Category/
Mailing Address 11150 Fairfax Bl Suite 505	lvd					Date			Туре
Cily Fairlex		State VA		Zip Code 22030		09	23	2	1016
Name of Federal Candidate, Supported	Office		nt: 'X	House	State: CA	·			
Caforio, Bryan, , ,		, ooug.		Senate	District: 25	Amount		•	
				Presidential	<u> </u>	-	,	, 4	6490.00
Aggregate General Election Expenditure for this Candidate  Transactio	n iD • 9	SF-950	014	96200		}			
Full Name (Lest, First, Middle Initial) of			<u></u>		: Meino liem	Purpose of	Expenditure		
Screen Strategies Media, L						Media S	arvices		
Mailing Address 11150 Feirlex Blvd					<u></u> n <u>n</u>	 			Category/ Type
Suite 505	<u> </u>	Clark-		7-0-4		Date			
City Fairfax	.	State VA		Zip Code 22030		09	28	201	6
Name of Federal Candidate Supported	Otfice	Sough	nt: ¥		State: CA	1		_ <u>+</u>	
Catono, Bryan				Senale Presidential	District: 25	Amount		1:	3431.04
Aggregate General Election Expenditure for this Candidate ►	Transi	, action	ID : SF	96200 -950737	.00		•	•	
SUBTOTAL of Expenditures This Page (opt								, 15	1121,04
TOTAL This Period (last page this line num	nber on	iy)					•.		

FEC Schedule F (Form 3X) Rev. 05/2016

# 17044444242

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.
- 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  $\partial l_{-}$  day of December, 2016.

- 2 -

Maura Jo

### **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 employce or agent of Dixon/Davis working on the Advertisement had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:
  - i. the content of the Advertisement;

- ii. the intended audience for the Advertisement;
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.

6. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had discussions with HFA or its agents about the Advertisement.

- 7. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used information previously used by Dixon/Davis in providing services to HFA in relation to the creation, production, or distribution of the Advertisement.

We declare under penalty of perjury that the foregoing is true and correct. Executed on this 22<sup>24</sup> day of December, 2016.

David Dix

tas Da Richard Davi

# 17044434247

# Exhibit D

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24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 9 OF 9
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	
	C C00000935
Check if [] 24-hour report 🕅 48-hour report 🕅 New report [] Amends report f	
Full Name of Payee Old Towne Media	Date of Public Distribution/Dissomination
Date of Dissemination: 10/19/16 Mailing Address c507 Penwood Dr	
	Amount
City State Zip Code	48000.00
Alexandria VA 22310	Transaction ID : SE-952383 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004 Type	10 18 2016
Name of Federal Candidate	flice Sought: House District: 00
Donald J. Trump 🕅 Oppose	President [] Senate State:
	Isbursement For: Primary X General
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media, LLC Date of Dissemination; 10/19/16	10 1 10 10 10 10 10 10 10 10 10 10 10 10
Mailing Address 222 West Ontario West	- to a to be a
Sulle 600	
City State Zip Code	81321.00
Chicago IL 60654	Transaction ID : SE-952887 Date of Disbursement or Obligation
Purpose of Exponditure Media Buy Cotegory 004 Type 004	10 14 2016
Name of Federal Candidate Support Of	ffice Scught: House District: 00
Donald J. Trump 🔀 Oppose	President Schate State:
	sbursoment For: Primary X General
(a) SUBTOTAL of Itemized Independent Expenditures	129321.00
	أستريب فانتقار فالمراجع وتحريك الأراكان أأ
(b) SUBTOTAL of Uniternized Independent Expenditures	أأساه بالمعاصيات فالمناف والمراجع
(c) TOTAL Independent Expenditures	
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Under penalty of perjury I cortily that the independent expenditures reported horein were not with, or at the request or suggestion of, any candidate or authorized committee or agent of eit party committee) any political party committee or its agent.	made in cooperation, consultation, or concert ther, or (if the reporting entity is not a political
Kelly C. Ward	10 21 2016
Signature Date ;	

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FEC Schedule E (Form 24/28) Rev. 09/2013

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
(Schedule E)	PAGE 48 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	
DCCC	· + - + + + + + + - + + - +
	C00000935
CC       C	
	Distribution/Dissemination
	151 B . 19 . 19 . 19 . 19 . 19 . 19 . 19 .
	2010
Amount	
	45000.00
ہ شے پ Fairfax VA 22030 Transaction I	
	• -
Media Buy Callegory 004 10 10	17 2016
Name of Federal Candidato	House District: 00
Oonald J. Trump X Oppose X President	Senate State:
	Primary 🕅 General
Per Election for Office Sought	ocify) >
	Distribution/Dissemination
AL Media LLC	The second se
Adultan Adultan	24 2010
Amount	
	131250.00
Chicago IL 80654 Transaction ID	) : SE-953187
	•
Media Buy Calegory 004 1 10	21 2016
Name of Federal Candidate	House District: 00
Donald J. Trump X Oppose X President	Sonate State:
Calendar Year To-Date Disbursement For: Per Election fur Office Sought Give S	
	cony)
(a) SUBTOTAL of Itemized Independent Expenditures	176250.00
(b) SUBTOTAL of Unitemized Independent Expenditures	· · ··································
and	a han
(c) TOTAL Independent Expenditures	لاسهار المتساويات وال
Under penalty of perjury I cortily that the independent expanditures reported herein were not made in cooperation with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the repor- party committee) any political party committee or its agent.	on, consultation, or concert rting entity is not a political
Kelly C. Ward by the second	* ***
Date 10 25	2016
Signature	

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IFEC Schedule E (Form 24/28) Rev. 09/2013

24/48 HOUR REPORT OF INDEPEN	IDENT EXPEND	ITURES		
(Schedule E)				PAGE 51 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)				
DCCC	ŧ			C c00000935
Check II 🔀 24-hour report 🚺 48-hour repo	ort 💢 New reg	port []] Amends repo	ort filed on [	- 'u' , '.'
Full Name of Payse			Date	of Public Distribution/Dissemination
AL Media LLC	ation: 10/25/18			10 25 2016
Malling Address 222 W Ontario St			;	10 25 2016
Suile 600			Amou	
City	State	Zip Code		9000.00
Chicago	۹L	60654		saction ID : SE-953228 of Disbursement or Obligation
Purpose of Expenditure · Madia Buy		Catagory/ Type 004	1 1	10 24 2016
Name of Federal Candidate	<u> </u>	Support	Office Sough	nt:   House District: 00
Donald J. Trump		X Oppose	X Presid	ent Senate State:
Calendar Year-To-Date Per Election for Office Sought		369947.93	Disbursemor	ni For: [] Primary  ∑  General Diher (specify) ▶
Full Name of Payee				of Public Distribution/Dissomination
Canal Partners Media, LLC Date of Dissemin	ation; 10/25/16		1	10 1 25 2016
Mailing Address 25 Whitlock Place			1	
Suite 200				المحمد أحمد المراجب ال
City	State	Zip Code		184082.00
Mariella	GA	30064		action ID : SE-952497 of Diabursement or Obligation
Purpose of Expanditure Media Buy		Category/ 004		10 19 2016
Name of Federal Candidate	<u></u>	Support	Office Sough	nt: House District: 00
Donald J. Trump		🕅 Oppose	X Presid	ent Senate State:
Calendar Year-To-Date Por Election for Office Sought	s su a Pa	4369947.93	Disbursemen 2016	nt For: [] Prlinary 🕅 General Diher (specify) 🕨
(a) SUBTOTAL of Itemized Independent Expe	noi(ures	,	· ► · ·	193082.00 ±
(b) SUBTOTAL of Uniternized Independent Ex	xpendilures			· · · · · · · · · · · · · · · · · · ·
				أسعه كالمسمون كالمدعونا الأ
(c) TOTAL Independent Expenditures	)	•• #• •• •• • • • • • • • • • • • • • •	•	
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Under penalty of perjury 1 certify that the indu- with, or at the request or suggestion of, any c party committee) any political party committee	andidate or authorized	reported herein were committee or agent o	not made in C f eilher, or (if	cooperation, consultation, or concert the reparting entity is not a publicat
Kelly C. Hard			y Li J	n 6 1 Y 1 7 TT T
Signaturo	• - •	- Date	10 1	25 2016
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FEC Schedule F. (Form 24/28) Rev. 09/2013

24/48 HOUR REPORT OF INDE	PENDENT EXPEND	TURES		
(Schedule E)				FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)				
DCCC				
				C00000935
Check if 🔀 24-hour report 🚺 48-hour	report X Now repo	ort [] Amends rep	ort filed on	
Full Name of Payee			Date of P	ublic Distribution/Dissemination
Moore Campaigns, LLC			10 I 10	28 2016
Mailing Address 447 Irving St, NW			Amount	. C. Kanadarah Junit mit and and
City	State	Zip Code	/	4472.36
Washington	DC	20010	Transacti Dalo of D	on ID : SE-954234 Isbursement or Obligation
Purpose of Expenditure Mail Services		Calegory/ 000 Type	10	27 2016
Name of Federal Candidate	فيجهد المائي مستجدة جرا متحصي محسور مناعن ور	Support	Office Sought:	House District: 00
Donald J. Trump		Oppose	President	Senale State:
Calendar Year-To-Dato Per Election for Office Sought		93586.81	Disbursoment Fo	r:  ] Primary 🕅 Goneral (specify) >
Full Name of Payse				ublic Distribution/Dissemination
AL Media LLC	•		1 1 1 1	
Mailing Address 222 W Ontario St	<b></b>		1.10	28 2016
Suito 600			Amount	
City	State	Zip Code		30525.00
Chicago	۱۲	80654	Transactio	n ID : SE-953928 Isbursoment or Obligation
Purpose of Expenditure Media Buy		Category/ 004 Type	10	26 2016
Name of Federal Candidate	•	Support	Office Sought:	House District: 00
Donald J. Trump		Coppose	X President	Senato State:
Calendar Year-To-Date Per Election for Office Sought		4593586.81	Disbursement Fo	r: []] Primary 🕅 General (specify) >
(a) SUBTOTAL of Itemized Independent	Expendituros		سدرت م∙سم • ► !	34997.36
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(b) SUBTOTAL of Uniternized Independe	nt Expenditures		• •	
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(c) TOTAL Independent Expenditures			•	1588663.18
Under penalty of perjury 1 control that the with, or at the request or suggestion of, a party committee) any political party committee.	any candidate or authorized	coportad harein wera committeo or agent o	not made in coopi f either, or (if the r	railon, consultation, or concert opening anilty is not a political
Ketly C. Ward		Data	0	0 1 / 5"Y 1 Y 1 Y 1 9
Signature		Date	; 10 ; 2	t contact
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FEC Schedule E (Fam 24/28) Rov. 09/2013

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

Schedule E)	PAGE 7 OF 8 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	
DCCC	C C00000935
Check if 🗶 24-hour report 📋 48-hour report . 🔪 🗶 New report 🦳 Amends report fil	
	have a set of the set of th
Full Name of Payee Adelstein & Associates LLC Date of Dissemination: 10/31/16	Date of Public Distribution/Dissemination
Mailing Address 222 West Ontario Street, Suite 600	10312016
City State Zip Code Chicago IL 60654	80000.00 Transaction ID : SE-954371
Purpose of Expenditure Category/ Media Buy 004	Date of Disbursement or Obligation
Name of Federal Candidate Support Of	flice Sought: House District: 00
	President     Senate State:
	sbursement For: Primary
Full Name of Payee Adelstein & Associates LLC Date of Dissemination: 10/31/16	Date of Public Distribution/Dissemination
Malling Address 222 West Ontario Street, Suite 600	Amount
City State Zip Code	67387.50
Chicago IL 60654	Transaction ID : SE-954372 Date of Disbursement or Obligation
Purpose of Expenditure Category/ 004 Media Buy 004	10 28 2016 2016
Name of Federal Candidate Support Of	ffice Sought: House District: 00
Trump, Donald, J., . X Oppose	X President Senate State:
	isbursement For: Primary X General 016 Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	147387.50
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	
Under penalty of perjury I certily that the independent expenditures reported herein were not with, or at the request or suggestion of, any candidate or authorized committee or agent of eit party committee) any political party committee or its agent.	
Ward, Kelly, C., [Flactronically Filed] Date	10 31 2016
Signature	againg tainstatest janahaanijaanihaadi

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FEC Schedule E (Form 24/28) Rov. 09/2013

hedule E)		NDITURES			PAGE 51	OF 52 F FORM 24/48
ME OF COMMITTEE (In Full)		·····		1		
CCC				FEC	DENTIFICAT	ION NUMBER
				C	C00000935	
ick if 24-hour report 848-hour report	New	report Amands rep	ort filed on	a a	* ·a. /*	
Full Name of Payer			Date	ol Publi	ic Distribution	VDissemination
Screen Strategies Media, LLC Date of Dissomination	ion: 10/18/16			* v. 10	۶ 18	2016
Malling Address 11150 Fairfax Blvd						
Suite 505			Arno	uni		
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Fairlax	VA	22030	Tran Date	saction of Disb	ID : SE-9523 ursement or	77 Obligation
Purpose ol Expendilure Madla Buy		Category/ Type 004		, 'i 10	11	2016
Name of Federal Candidate		Support	Office Soug	ht:	House	District: 00
Donald J. Trump			X Presid		Senale	State:
Calendar Year-To-Date			Disburseme	ni For:	Primar	X General
Per Election for Office Sought	1	2613000.20	1 2016		oscily) 🕨	· · ·
Full Name of Payee		· · ·	Date	of Publ	ic Distribution	/Dissemination
Kully Hali, LLC Date of Disseminat	ion: 10/18/16		í	<b>`</b> ۱0	- e	2016
Mailing Address 1932 1st Avo, Suite 203		/ • • • • • • • • • • • • • • • •	 Amo	•		2010
Cily	Stato	Zip Code				6225.00
Scattle	WA	98101			D : SE-95237 ursement or	
Purpose of Expanditure Media Buy Media Production		Category/ Type		<sup>**</sup> 10 <sup>°</sup>	18	2016
	····	Туре				
Media Buy Media Production	<u></u>	Category/ Type Support X. Oppose	Office Soug	ht: ;		District:00
Media Buy Media Production Namo of Foderal Candidate Donald J. Trump Calendar Year-To-Date	<u></u>	Type Support X. Oppose	Office Soug	ht: :	House	District: 00 - State:
Media Buy Media Production Name of Foderal Candidate Donald J. Trump		Type Support	Office Soug X: Presid Disburseme 2015	nt:	House	District: 00 - State:
Media Buy Media Production Name of Foderal Candidata Donald J. Trump Calendar Year-To-Date Per Election for Office Sought		Туре Support Ž. Оррозв 2613000.20	Office Soug X: Presid Disburseme 2016	nt:	House Schate	District: 00 - State:
Media Buy Media Production Name of Foderal Candidata Donald J. Trump Calendar Year-To-Date Per Election for Office Sought		Туре Support Ž. Оррозв 2613000.20	Office Soug X: Presid Disburseme 2016	nt:	House Schate	District: 00 - State:
Media Buy Media Production Name of Foderal Candidate Donald J. Trump Calendar Year-To-Date Por Election for Office Sought a) SUBTOTAL of Itemized Independent Expen	diures	Туре Support Х. Оррозв 2613000.20	Office Soug X: Presid Disburseme 2016	nt:	House Schate	District:00 - State: y X Genera
Media Buy Media Production Namo of Foderal Candidate Donald J. Trump Calendar Year-To-Date	diures	Туре Support Х. Оррозв 2613000.20	Office Soug X: Presid Disburseme 2016	nt:	House Schate	District:00 - State: y X Genera
Media Buy Media Production Name of Foderal Candidate Donald J. Trump Calendar Year-To-Date Por Election for Office Sought a) SUBTOTAL of Itemized Independent Expen	ditures	Туре Support Х. Оррозв 2613000.20	Office Soug X: Presid Disburseme 2015	nt:	House Schate	District:00 - State: y X Genera
Media Buy Media Production Name of Foderal Candidate Donald J. Trump Calendar Year-To-Date Por Election for Office Sought a) SUBTOTAL of Itemized Independent Expen b) SUBTOTAL of Unitemized Independent Exp	ditures	Туре Support Х. Оррозв 2613000.20	Office Soug X: Presid Disburseme 2015	nt:	House Schate	District:00 - State: y X Genera
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48 HOUR REPORT OF INDEPEND hedule E)	ENT EXPE	NUTURES		PAGE 48 OF 60
			<u> </u>	FOR SE OF FORM 24/48
ME OF COMMITTEE (In Full)		·	FEC	DENTIFICATION NUMBER
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eck if 💥 24-nour jepart 📃 48-hour roport	X. Nev	report , 1 Amends rep	v v	0 f 3 - Y Y 4
Full Name of Payee			Date of Pub	C Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination	on: 10/24/16			24 2016
Mailing Address 11150 Fairlax Blvd			Amount	
Suito 505			Amooni	
City	State	Zip Code		45000.00
Fairfax	VA	22030	Date of Disc	ID : SE-952072 sursement of Obligation
Purpose of Expenditure . Media Buy		Calegory/ Type 004	10	17 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	XI President	
Calendar Year-To-Dato Per Election for Office Sought	***	3653174,61	Disbursement For:	Primary X. Genera
	, 			pecify) ►
Full Name of Payee AL Media LLC				lic Distribution/Dissemination
Date of Disseminatio	in: 10/24/16		10	24 2016
Mailing Adoress 222 W Ontario St Suite 600			Amouni	
Cily	State	Zip Code		131250.00
Chicago		60654		D: SE-953187 sursement or Obligation
Purpose of Expenditure Media Buy	·	Category/ 004	<b>10</b>	21 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		X Orpose	1	Senale Slale:
Calendar Year-To-Dale Per Election for Office Sought		3653174.81	2016	Primary X Genera
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		•		176760 00
<ul> <li>a) SUBTOTAL of Itemized Independent Expended</li> </ul>			··· ► ,	176250.00
b) SUBTOTAL of Uniternized Independent Expe	nditures			
			-	, -
c) TOTAL Independent Exponditures			‴► ,	
			·	
· · · · · · · · · · · · · · · · · · ·	odent evnendit	ures reported herein were	not made in coopera	tion, consultation, or concert
Incer penalty of perjury I certily that the indepe vith, or at the request or suggestion of, any can arty committee) any political party committee or	didate or author	rized committee or agent	or cillier, or (il ind rep	oring entry is not a political
rith, or at the request or suggestion of, any can	didate or author	rized committee or agent	or citner, or (il ino rep	oring entity is not a politicat بن بن ۲

FEC Schedule E (Form 24/28) Rev. 09/2013

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48 HOUR REPORT OF INDEPEN hedule E)			PAGE 52 OF 60 FOR SE OF FORM 24/48
ME.OF COMMITTEE (In Full)			FEC IDENTIFICATION NUMBER
ccc			C C00000935
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eck if 🔀 24-hour report 📃 48-hour repor	New	report Amends ray	oort filed on
Full Name of Payee Screen Strategies Media, LLC		· · ·	Date of Public Distribution/Olssemination
Date of Dissemina	lion: 10/25/16		10 25 2016
Mailing Addross 11150 Fairfax Blvd Suite 505			Amount
Clty	State	Zip Code	64326.00
Fairlax	VA	22030	Transaction ID : SE-953184 Date of Disbursoment or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	
Name of Federal Candidate		j Support	Office Sought: House District: 00
Donald J. Trump		X Oppose	IX President Senate State:
Calendar Year-To-Dale Por Election for Office Sought		4359947.93	Disbursement For: Primary X Gene 2016
Full Name of Pavee			
Buying Time, LLC Date of Dissemina	tion: 10/25/16		Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Avenue	e. NW		
Suite 210			Amouni
Cily	State	Zip Code	62488.00
Washington	DC	20001	Transaction ID : SE-953185
Purpose of Expenditure Media Buy		Category/ Type 004	10 21 2016
Name of Federal Candidate		Support	Office Sought: House District:00
Donald J. Trump		X Oppose	President Senato State:
Calendar Year-To-Date Per Election for Office Sought	· 2	4369947.93	Disbursement For: Primary X Gene 2016 - Other (specify)
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FEC Schedule E (Form 24/28) Rev. 09/2013

48 HOUR REPORT OF INDEPEN hedule E)		NDH UNES	PAGE 8 OF 8 FOR SE OF FORM 24/48
NE OF COMMITTEE (In Fuil) CCC	<u></u>		
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Full Name of Payee Screen Strategies Media, LLC Date of Dissemin,			Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd		بىلەر بىرىنى ئەتتىر قىتۇسىرى بىرىمىرىدى ب	Amount -
Suite 505			
City	State	Zip Code	55000.0
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Name of Federal Candidate		Support	Office Sought: House District:00
Donald J. Trump		X Oppose	
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Suite 600	Siate	Zip Code	115875.00
Chicago	IL	60654	Transaction ID : SE-954178
Purpose of Expenditure Media Buy		Category/ Type 004	
Name of Federal Candidate		Support	Office Sought: House District: 0
Donald J. Trump		X. Oppose	XI President Sonate State:
Calendar Year To-Date, Per Election for Office Sought	,	4979620-65	Disbursement For: Primary X Gene 2016
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c) TOTAL Independent Expenditures			
	andidate or author		not made in cooparation, consultation, or conce of either, or (if the reporting entity is not a politic
Kelly C. Ward			™ * 4' × • * 1 ⊳ 10 31 2015

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

(Schedule E)		DITURES	PAGE 10 OF 11 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			FEC IDENTIFICATION NUMBER
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Full Name of Payee Screen Strategies Media, L Date of Diss	LC emination: 11/04/16		Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd Suite 505			Amount
Cily Fairfax	State · VA	Zip Code 22030	40000.00 Transaction ID : SE-954176
Purpose of Expenditure Media Buy	·····	Category/ Type	Date of Disbursement or Obligation
Name of Federal Candidate Trump, Donald, J., ,		Support X Oppose	Office Sought: House District: 00
Calendar Year-To-Date Per Election for Office Sought	Landers and the second s	6419383.70	Disbursement For: Primary X General 2016 Olher (specify) ►
	emination: 11/04/16		Date of Public Distribution/Dissemination
Mailing Address 222 W Ontario St Suite 600			
City Chicago	State IL	Zip Code 60654	j 3750.00 Transaction ID : SE-954988 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004 Type	
Name of Federal Candidate Trump, Donald, J., ,		Support	Office Sought: House District: 00
Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbursemont For: Primary
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Under penally of perjury I certify that the with, or at the request or suggestion of, party committee) any polltical party comm	any candidate or authorize	es reported herein were ed committee or agent o	not made in cooperation, consultation, or concert of eliher, or (if the reporting entity is not a political
Ward, Kelly, C., , Signature	[Electro	unically Filed/ Date	11 04 2016
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# Image# 201611049037121059 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

(Schedule E)	ENDENI EXPEND	ITURES		PAGE 9 OF 11
				FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			FEC II	
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Full Name of Payee Screen Strategies Media, LL	С			c Distribution/DissemInation
Date of Disser	nination: 11/04/16		11	04 2016
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Suite 505	Ctota	Zia Cada	<b>k</b>	
City Fairfax	. State VA	Zip Code 22030	Transaction	13000.00 ID : SE-954882
Purpose of Expenditure				ursement or Obligation
Media Buy		Category/ Type 004	11 11	03 2016
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	مىي ئىندىيىتىيەت يېتىيەر يېتىيە يېتىيە بىر ( ئىستان بىيەر ئەتەر ئارىيە ئىيەر ئەتەر ئا	6419383.70	Disbursement For: 2016	Primary X General
Full Name of Payce	<u>مواند نور المعمد ا</u>			c Distribution/Dissemination
The New Media Firm, Inc.	mination: 11/04/16			04 2016
Mailing Address 1730 Rhode Island Ave				Landard Landard Land
Suite 213	•		Amount	
City	State	Zip Code	in the second second	46000.00
Washington	DC	20036	Date of Disb	D : SE-954883 ursement or Obligation
Purpose of Expenditure Media Buy	•	Category/ 004 Type		2016
Namo of Foderal Candidate		Support	Office Sought:	House District: 00
Trump, Donald, J., ,		K Oppose	× President	Senate State:
Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbursement For: 2016	Primary ✗ General peclly) ▶
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(c) TOTAL Independent Expenditures	•••••••••••••••••••••••••••••••••••••••		·· > hu hadaadh	
Under penalty of perjury I certify that the with, or at the request or suggestion of, ar party committee) any political party commit	ly candidate or authorized	reported herein were I committee or agent o	not made in coopera of either, or (if the rep	tion, consultation, or concert orting entity is not a political
Ward, Kelly, C., ,	[Electron	ically Filed/ Date	11 04	2016
Signature				16 Junelistandramiliettel

FEC Schedule E (Form 24/28) Rov. 09/2013

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SCHEDU	LE	Ε	(FEC	Form	3X)
ITEMIZED	IND	EPE	NDENT	EXPE	NDITURES

EMIZED INDEPENDENT EXPENDITURES						024 OF 109107 24 OF FORM 3X
NAME OF COMMITTEE (In Full)	·			550 1		
DCCC					JENTIFICAT	,
				С	C0000093	5
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Full Name of Payee Screen Strategies Media, LLC	she atla a davi	, Memo	ltəm			VCissemination
Date of Dissemination: 11/07/16 - 24 hours prior to Mailing Address	election day			11	07-	2016
Suile 505				Amount		
City	Stato	Zip Code			•	38173.50
Fairfax	VA .	22030		Transaction Duie of Disbu		
Purpose of Expenditure Media Buy		Category/ Typa 004		11	01	2018
Name of Federal Candidate:		Support	Office	Sought:	House	District:
Trump, Donald, J.,		x Oppose		President	Senate	State:
Calendar Year-To-Date Per Election for Office Sought	; 	6693372,69	Disbur 201ô	sement For: Other (sp		ry '≭ Ganeral
Full Name of Payac		· Memo	Kern	Date of Publi	c Distribution	VOissemination
The New Media Firm, Inc. Date of Dissemination: 11/01/16				11		2018
Mailing Address 1730 Rhode Island Ave NW		·		Amount		
. Suite 213						3556.00
City Washington	State DC	Zip Code 2003ô	·	Transaction		. 643
Purpose of Expenditure	<u></u>			Date of Disbu	irsement or	Obligation .
Media Production		Category/ Type 004		11	01	2015
Name of Federal Candidate:		Support	Office	Sought:	House	District:
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Calendar Year-To-Date Per Election for Office Sought		6693372.69	Disbur 2016	sement For:	i : Prima	ry 🕺 General
Per Election for Unice Solight	•	•		Other (st	pecily) 🕨	<u></u>
(a) SUBTOTAL of Itemized Independent Expenditures	******		₽.			41739.50
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Under penalty of perjury I centify that the independe with, or at the request or suggestion of, any candid party committee) any political party committee or its	ate or authorized	reported herein were committee or agent o	noi ma of either,	de in coopera , or (il the rep	tion, consult orting entity	ation, or concert is not a political
Ward Kelly, C.	Electronically Fil	wl)	. 12	08	21	: )16
Signature	•	. Date	. 12	00		

FEC Schedule E (Form 3X) Rev 05/2016

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AME OF COMMITTEE (In Full)	······	······································	FEC I	FOR SE OF FORM 24/48
DCCC ·			· · · ·	C00000935
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Full Name of Payer Screen Strategies Media, LL	Ċ.			C Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd	nination: 10/18/16		10	18 2016
Suite 505			Amount	
City	Slate	Zip Code		134898.50
Fairfax	VA	22030	, Transaction	10.: SE-952377
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Purpose of Expenditure Media Buy		Category/ Type 004	้ำว่	11 2016
Name of Federal Candidato	•	Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	X President	Senale State:
Calendar Yoar To Date			Disburgement For	Primary Y Ganaral
Per Election for Office Sought		2613000.20	2016 : Other (sp	navity >
Full Name of Payee				c Distribution/Dissemination
Kuliy Hali, LLC				
Dale of Dissen	nination: 10/18/16		10	18 2015
Mailing Address 1932 1st Ave, Suite 203	3		Amouni	
City	State	Zip Code		6225.00
Scattle	WA	98101	Transaction I	D : SE-952379
			Date of Disb	ursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Typa	10	18 2016
Name of Federal Candidate		· Support	Office Sought:	House District: 00
Oonald J. Trump		X. Oppose		
			Oisbursement For:	Senate State: Primary X General
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(c) TOTAL Independent Expanditures			· •	
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Under penalty of perjury I certify that the i with, or at the request or suggestion of, an party committee) any political party committ	y candidate or authoriz			
Kelly C. Ward			· •	•
متراجع والمحسية ووردوره		Date		2015
Signature				

FEC Schedule E (Form 24/28) Rev 09/2013

24/48 HOUR REPORT OF INDEI	PENDENT EXPEND	ITURES		
(Schedule E)				PAGE 3 OF 3 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			FEC ID	
DCCC			الحابية السبي ال	C00000935
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Full Name of Payse	•		Date of Public	C Olstribution/Olssemination
Buying Time, LLC Date of Diss	eminallon: 10/11/16	-	10 × 10	1 11 2016
Mailing Address 650 Massachusetts Ave	enua, NW	· · · · · · · · · · · · · · · · · · ·	; ; ; ;	Summer of the second of the
Suite 210			Amount	and a second state of the
City	Stato	Zip Code		57500.00
Washington	DC	20001	Transaction I	D : SE-951439 reement or Obligation
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Name of Federal Candidate	•			
Trump, Donald, J., ,		Support	Office Sought:	Houso District: 00
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Calondar Yoar To-Date Per Election for Office Sought	د	1459931.62	Disbursoment For: 2016 Other (ap	}] Primary   ¥   Genoral colify) ▶
Full Name of Payee				: Distribution/Dissomination
Screen Strategies Media, LLC Date of Diss	; emination: 10/12/16		10	12 2016
Moiling Address 11150 Fairfax Blvd		•	1	
Suite 505			Amount	the sector and the second second
City	State	Zip Code		74632.00
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Purpose of Expenditure Media Buy		Category/ Typo 004	10	11 2016
Name of Federal Candidate	<u> </u>	Support	Offico Sought:	House District: 00
Trump, Donald, J., ,		V Oppose	K President	Senato State:
Calendar Year-To-Date	· · · · · · · · · · · · · · · · · · ·	- Januar alama	Disbursoment For:	Primary X Goneral
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Under penalty of perjury I certify that the with, or at the request or suggestion of, a party committee) any political party comm	any candidate or authorized			
Ward, Kelly, C	/Electron	cally Filed   Date	10 13	2016
Signature				· · ·
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24/48 HOUR REPORT OF INDEPENDENT EXI (Schedule E)	PENDITURES	PAGE 17 OF 17
NAME OF COMMITTEE (In Full)		FOR SE OF FORM 24/48
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Full Name of Payoo Screen Strategies Media, LLC Date of Dissemination: 10/20/16		Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd		
Suite 505		Amount
City State	Zip Code	107040.00
Fairfax VA	22030	Transaction ID : SE-952389 Date of Disbursement or Obligation
Purpose of Expanditure Media Buy	Category/ Figure 1004	10 18 2016
Namo of Federal Candidate	Support	Office Sought: House District: 00
Donald J. Trump	X: Oppose	IXI Presidont State:
Calendar Yaar To-Date		Disbursement For: Primary X General
Per Election for Office Sought	2989611.20	2016 Other (specify) ►
Full Name of Payer		Date of Public Distribution/Dissemination
AL Media LLC		
Date of Dissemination: 10/20/16		10 20 2016
Mailing Address 222 W Ontario St		Amount
Sulte 600		ومنها منهم مراجع المراجع
City State	Zip Code	
Chicago IL	60654	Transaction ID : SE-952071 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	Calegory/ 004 Type	, 10 17 2016
Name ol Federal Candidate	Support	Office Sought: House District: 00
Donald J. Trump	Depose	President State:
Calendar Year-To-Date Per Election for Office Sought	2989611.20	Disbursement For: Primary X Goneral 2016 Other (specify) >
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a) SUBTOTAL of Itemized Independent Expenditures	<b>.</b>	▶ 247290.00
(b) SUBTOTAL of Unitemized Independent Expenditures		· ►
(c) TOTAL Independent Expenditures		▶ 652070.38
Under penalty of perjury I certify that the independent exper with, or at the request or suggestion ol, any candidate or au party committee) any political party committee or its agent.	nditures repurted herein were ithurized committee or agent c	not made in cooperation, consultation, or concert it either, or (if the reporting entity is not a political
Kelly C. Ward	Date	10 21 2016
Signature		
		FEC Schedule E (Form 24/28) Rov. 09/2013

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24/48 HOUR REPORT OF INDEPEN (Schedule E)	DENT EXPEN	DITURES		PAGE 15 OF 15
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NAME OF COMMITTEE (In Full)				
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Full Name of Payee				
Prism Communications, Inc.				Date of Public Distribution/Dissemination
Date of Dissemina	tion: 10/27/16			10 27 2016
Mailing Address 1000 Potomac Street, NW				· ·
Suite 420				Amount
City	State	Zip Code		3291.58
Washington	DC	20007		Transaction ID : SE-953927
				Date of Disbursement or Obligation
Purpose of Expenditure Media Production		Category/ 004	. ·	10 26 2016
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Name of Federal Candidate		Support	Office	Sought: House District: 00
Donald J. Trump				
		<u>CN</u> oppose		
Calendar Year-To-Date		550355.45	2016	ursement For: Primary 🔀 General
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76 Words Corp.				THE REPORT OF A STATE A STA
Date of Dissemina	1000: 10/26/16			10 26 2016
Mailing Address ; 121 5th St. NW				Amount
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City	State	Zip Code		5500.00
Washington	DC	20001		Transaction ID : SE-954171 Date of Disbursement or Obligation
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Madia Production		Category/ Type 004		10 27 2016
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Name of Federal Candidate		Support	Offic	e Sought: House District:
Donald J. Trump		🔀 Oppose		President Senato State:
Calendar Year-To-Date	•		Disb	ursement For: Primary X! General
Per Election for Office Sought		4436718.92	2016	, () · · · · · · · · · · · · · · · · ·
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Under penalty of perjury I certify that the inde				
with, or at the request or suggestion of, any c party committee) any political party committee		d committee or agent of	of eithe	r, or (if the reporting entity is not a political
party communes ony primital party commune	אי איש מאבוור			
Kelly C. Ward			֥	11 / 5 B 'Y Y Y''
·		Date	e 1	0 27 2016
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24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 22 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	
DCCC	C00000935
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Date of Dissemination: 10/12/16 10 1	12 2016
Mailing Address 1932 1st Ave. Suite 203 Amount	
City State Zip Code	4297.00
Seallic WA 98101 Transaction Date of Disb	ID : SE-951665 pursement or Obligation
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Name of Federal Candiduto	House District: 00
Donald J. Trump	Senate State:
Calendar Year-To-Date Disbursement For: Per Election for Office Sought	Primary X General
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Malung Address 1730 Rhode Island Avo., NW Amount	ta de la bria a surra d
Suite 213	· · · · · ·
	56930.43
	ursement or Obligation
Name of Federal Candidate   Support Office Sought:	House District: 00
Donald J. Trump X Oppose X President	Senato State:
Calendar Yoar To-Date Disbursement For: Per Election for Office Sought for the second formed and the second fo	] Primary X General
(a) SUBTOTAL of Itomized Independent Expenditures	61227.43
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	· · · · · ·
Uncer penalty of perjury I certify that the independent expenditures reported herein were not made in coopera with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the rep party committee) any political party committee or its agent.	uion, consultation, or concert porting entity is not a political
Kelly C. Ward Date: 10 14 Signature	2016

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## Image# 201610149032527772 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	
DCCC				C	C00000935
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Full Name of Payee The New Media Firm, Inc. Date of Dissemination	: 10/12/16	·			blic Distribution/Dissemination
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Suile 213				mount	
City	State	Zip Code			4047.25
Washington	DC	20036		ransactio	n ID : SE-951654 bursement or Obligation
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Trump, Donald, J., ,		X Oppose	X Pr	esident	Senate State:
Calendar Year-To-Date	ي مين مر <del>سومي</del> 1 - مير مر	1721688.30	Disburse 2016	ment For: ] Other (	specify)
Full Name of Payee			D	ate of Put	blic Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination	: 10/12/16			່ນີ້ ນີ້ 10	12 2016
Mailing Address 11150 Fairfax Blvd					
Suite 505				mount	
City	State	Zip Code		, ,	121850.00
Fairfax	VA	22030		ansaction	ID : SE-951660 soursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004	1	10 <sup>1</sup>	12 2016
Name of Federal Candidate		Support	Office Se	ought:	House District:00
Trump, Donald, J., ,		X Oppose	X Pr	esident	Senate State:
Calendar Year-To-Date Per Election for Office Sought	· · · · · · · · · · · · · · · · · · ·	1721688.30	Disburse 2016	ment For:	Specify) ▶
		·····	· · ·	·	
(a) SUBTOTAL of Itemized Independent Expendit	U/8\$		·· 🕨 :		125897.25
(b) SUBTOTAL of Uniternized Independent Expen	ditures	,,	•• [		<b>ہے۔ بیشرخت میں ور نے بیٹر میں ہے۔</b> 1 میں میں اور
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(c) TOTAL Independent Expenditures			•	- la uden '	1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-
Under penalty of perjury I certify that the indepen with, or at the request or suggestion of, any candi party committee) any political party committee or h	date or authorize				
Ward, Kelly. C., .		-			-
-	[Electro	nically Filed Date	10	14	2016
Signature	· · · · · ·			•	·· ·

FEC Schedule E (Form 24/28) Rev. 09/2013

#### Image# 201610189033039655 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

(Schedule E)	PAGE 21 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	
DCCC	C c00000935
Check if 24-hour report 🗶 48-hour report 📄 New report 🗶 Amends report filed on 🚺	0 14 2016
Full Name of Payee Date of	Public Distribution/Dissemination
The New Media Firm, Inc. Date of Dissemination: 10/12/16	12 2016
Mailing Address 1730 Rhode Island Ave., NW Amoun	in and Sama, adapting the addressed and any of the
Suite 213	، مرتبعه المحمد الم
City State Zip Code	4047.25
Date of	ction ID : SE-952372 Disbursement or Obligation
	10 14 2016
Name of Federal Candidate Support Office Sought:	House District: 00
Trump, Donald, J., , X Oppose X Presider	nt Senate State:
Calendar Year-To-Date Disbursement Per Election for Office Sought	For: Primary
	Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/12/16	10 12 2016
Malling Address 11150 Fairfax Blvd Arroun	diana 'ara'na ing 'ang matana' 1
Suite 505	د. او معمومتها را معرضه برد امر معرضه دار مار و م
City State Zip Code	121850.00
Fairfax VA 22030 Transac Date of	tion ID : SE-952373
Name of Federal Candidate Support Office Sought:	House District: 00
Trump, Donald, J., ,	nt Senate State:
Calendar Year-To-Date Disbursement 2016 Disbursement	For: Primary _ X General her (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	
	tan ito at anin anto a banatana Tana, and
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	a mana annana an sua d
Under penalty of perjury I certify that the independent expenditures reported herein were not made in co with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the party committee) any political party committee or its agent.	operation, consultation, or concert ne reporting entity is not a political
Ward, Kelly, C., . [Electronically Filed] Date 10	18 2016 a
Signature	1

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FEC Schedule E (Form 24/28) Rev. 09/2013

24/48 HOUR REPORT OF INDEPENDEN	T EXPEND	ITURES		
(Schedule E)				PAGE 3 OF 3 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)				
DCCC				C C00000935
Check II 24-hour report 🔀 48-hour report	New rep	ort [] Amends rep	ort filed on	······································
Full Name of Payee Buying Time, LLC				of Public Distribution/Dissemination
Date of Dissemination: 1 Mailing Address 650 Massachusetts Avenue, NW	0/11/16		i	10 11 2016
Sulte 210			Аттоц	nt
City	State	Zip Code	[ 7 "	57500.00
Washington	DC	20001		action ID : SE-951439 of Disburgement or Obligation
Purpose ol Expenditure Media Buy		Category/		10 , 11 2016 ,
Name of Federal Candidate		Support	Office Sough	t: House District: 00
Donald J. Trump			Reside	land l
Calendar Year-To-Oato Per Election for Office Sought		59931.62	2016 1 1	t For: Primary 🕅 General ther (spocify) 🕨
Full Name of Payee				of Public Distribution/Dissomination
Screen Strategies Media, LLC	0/12/18		l qu	
Mailing Address 11150 Fairfex Blvd			1_	
Suite 505			Amou	nt
City	State	Zip Code		74632.00
Fairfax	VA	22030	Transa	ction ID : SE-951438 of Disbursement or Obligation
Purpose of Expenditurc Madia Buy		Category/ 004 Type	] [	10 11 2016
Namo of Fodoral Candidate		Support	Office Sough	t: Houso District: 00
Donald J. Trump			X Preside	ent Senate Stato:
Calendar Year To-Date Per Election for Office Sought	•••	1534563.62	2016	t For: Primary X Goneral
	1 1 	·	0	ther (specily)
(a) SUBTOTAL of Itemized Independent Expenditure	S		• 🕨	132132.00
(b) SUBTOTAL of Uniternized Independent Expenditu	ures		•	
			• •	inan in a search and an
(c) TOTAL Independent Expenditures			•	170032.00
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candidat party committee) any political party committee or its a	te or authorized	reported herein were committee or agent o	nol made in c f either, or (if i	ooperation, consultation, or çoncart the reporting entity is not a political
Kelly C. Ward			чи,	19 - 0 , 1 Y Y Y Y I
Signature		Dale	; 10 , ,	13 2016
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CCCC       If be bench and of Nondestanding work of the second filed on the second filed	ME OF COMMITTEE (In Full)				SE OF FORM 24/48
Full Name of Payee       Date of Public DistributionObsemination:         Screen Strategies Media, LLC       Date of DistributionObsemination:         Mailing Address 11100 Fairs Bivd       Amount         Sulls 505       Amount         City       State       Zio Code         Fairs       VA       20300         Purpose of Expenditure       Category/       Oct         Mailing Address       Category/       Oct         Office Sought       10       State         Category/       Oct       Fill         Date of Desortination: 10/25/16       Date of Desortination: 10/25/16         Media Buy       Category/       Oct         Purpos of Expanditure       Category/       Oct <th></th> <th>·</th> <th></th> <th></th> <th></th>		·			
Full Name of Payee       Date of Public DistributionObsemination:         Screen Strategies Media, LLC       Date of DistributionObsemination:         Mailing Address 11100 Fairs Bivd       Amount         Sulls 505       Amount         City       State       Zio Code         Fairs       VA       20300         Purpose of Expenditure       Category/       Oct         Mailing Address       Category/       Oct         Office Sought       10       State         Category/       Oct       Fill         Date of Desortination: 10/25/16       Date of Desortination: 10/25/16         Media Buy       Category/       Oct         Purpos of Expanditure       Category/       Oct <td>eck if 🔀 24-hour report 🔲 48-hour n</td> <td>sport 🕅 New :</td> <td>report 🚺 Arnonds rep</td> <td>Dort filed on</td> <td>i] · [ · · · · · · · · · · · ·</td>	eck if 🔀 24-hour report 🔲 48-hour n	sport 🕅 New :	report 🚺 Arnonds rep	Dort filed on	i] · [ · · · · · · · · · · · ·
Screen Strategies Media, LLC Date of Dissemination: 10/25/16       10       23       2018         Mailing Address 11150 Fairfax Bivd Sulls 505       Anount       Anount       11       121850.0         City       State       Zto Code       121850.0       121850.0         Purpose of Expenditure Media Buy       Category/ Type       004       11       16       2016         Name of Federal Candidate       Support       Office Sought       16       16       211850.0         Data of Federal Candidate       Support       Office Sought       16       17       17       10       17       10       17       10					al lastines
Sulle 503       Anount         Fairfax       VA       22030         Purpose of Expenditure       Category       004         Name of Federal Candidate       Support       Office Sought         Data of Polyce       Senate State:       Discussment of Obligation         Category       004       President       Senate State:         Category       004       President       Senate State:         Category       006       President       Senate State:         Category       007       President       Senate State:         Category       006       Office Sought       President       Senate State:         Category       007       President       Senate State:       Discussment For:       Primary         Category       Data of Delaconination: 10/25/16       Data of Delac Olderination: 10/25/16       Data of Delac Olderination: 10/25/16         Meiling Addresa       650 Mossachusetts Avonue, NW       Suite 210       Data of Delac Olderination: 10/25/16         Name of Federal Candidate       Support       Doffice Sought       House District: DO         Purpose of Expenditure       Support       Doffice Sought       1061:00         Name of Federal Candidate       Support       Doffice Sought       1061:00	Screen Strategies Media, LL	C nination: 10/25/16		10 25	
Suite 505         City       State       Zio Code       12185.00         Purpose of Expenditure       VA       22030       Transaction 10 : 56 - 55236         Name of Federal Candidate       Support       Office Sought       18 / 72016         Donald J, Trump       Support       Office Sought       President       Senate       State         Category/       Donald J, Trump       Dopose       President       Senate       State         Category/       Date of Disacrement or Obligation       President       Senate       State         Par Election for Office Sought       4356947.93       Discussment For:       Primary       Office Sought         Full Name of Payee       Date of Disacrumention: 10/25/16       Date of Public Distributon/Disacrumention: 10/25/16       Date of Public Distributon/Disacrumention: 10/25/16         Meiling Address       650 Mossachusetts Avanue, NW       Subte 210       Transaction for State 3228         Category/       Dod       100 / 22 / 2016       Integration or Office Sought       Integration or Office Sought         Name of Federal Candidate       Support       Dod       Integration or Office Sought       Integration or Office Sought         Danad J, Trump       Category/       004       Integration for Office Sought       Integration for Office Sough	Mailing Address 11150 Fairfax Blvd			Amount	und Landaraderader
Fatfax       VA       22030       Tarasetton ID: SE-65238       Disbusement or Obligation         Purpose of Expenditure       Support       004       10	Sulle 505				
Purpose of Expanditure       Category       004       10       11       2016         Name of Federal Candidate       Support       Office Sought       House District:	•			Transaction ID : SE-	952388
Donald J. Trump       Image: Colored to the second to the s				50 - M3 - FOT	11, 1 <del>7 17</del> 17 T
Donald J. Trump       Coppose       President       Senate       State:         Par Election for Office Sought       4366947.93       Disbursement For:       Primary       Gene         Poil       Name of Payee       Date of Dissortination:       10/25/16       Date of Public Distributor/Dissortination         Meiling Address       650 Messachusetts Avonue, NW       Suite 210       Amount       16/25/16         City       State       Zip Code       Trensaction ID: SE 553229       Date of Disbursement For:       19691.00         Purpose of Expenditure       Category       Cote of Obligation       10/25/16       Trensaction ID: SE 553229       Date of Disbursement or Obligation         Name of Federal Candidate       Support       Over       Over       19691.00       Trensaction ID: SE 553229       Date of Disbursement or Obligation         Name of Federal Candidate       Support       Over       Over       Viriation ID: SE 500000       10/1 (2/24) (	Name of Federal Candidate	·····		Office Soupht:	se District: 00
Calendar Year-To-Date Per Election for Office Sought       Disbursement For:       Primary       Calendar Year-To-Date Date of Public Distribution/Dissemination:         Full Name of Payee       Buying Time, LLC Date of Dissomination:       Date of Public Distribution/Dissemination         Meiling Addross       650 Mossachusetts Avanue, NW Suite 210       Date of Public Distribution/Dissemination         City       State       Zip Code         Washington       DC       20001         Purpose of Expanditure       Category/ Type       004         Media Buy       Category/ Type       004         Name of Federal Candidate       Support       Office Sought         Donald J. Trump       Xi Oppose       Office Sought       2016         Calendar Year-To-Date Per Election for Office Sought       4369947.93       Disbursement For:       Primary Xi Gene 2016         SUBTOTAL of Itemized Independent Expenditures       4369947.93       Disbursement, For:       Primary Xi Gene 2016         Disbursement For:       Primary       Meanter       Support       Disbursement, For:       Primary Xi Gene 2016         Other (specify) >	Donald J. Trump			· ··-·	
Full Name of Payee       Buying Time, LLC       Date of Dissomination: 10/25/16       Date of Public Distribution/Disseminatio/Disseminatio/Dissemination/Dissemination/Dissemination/		• • •	4369947.93	Disbursement For:	imary 🕅 Gene
Buying Time, LLC       Date of Dissomination: 10/25/16       Image: Construct of Construction	Full Name of Paves				والمست فتسعى والمنصر فال
Mailing Address       650 Mossachusetts Avonue, NW         Suite 210         City       State       Zip Code         Washington       DC       20001         Purpose of Expenditure       Category!       004         Media Buy       Category!       004         Name of Federal Candidate       Support       Office Sought:         Donald J. Trump       Xi Oppose       Office Sought:       House         Category!       004       Total       State:       Office Sought:         Category:       004       Total       State:       Office Sought:       House         Denald J. Trump       Xi Oppose       Office Sought:       House       Disbursement For:       Primary       Gene         Category!       4369947.93       Office Sought:       Primary       Gene         Disbursement For:       Primary       Gene       Other (specify) >         a)       SUBTOTAL of Unitemized Independent Expenditures       Primary consultation, or concertainty or periury I certify that the independent expenditures reported horoin were not made in cooperation, consultation, or concertainty, or anther repuest or suggation of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a politicarty committee or its agent.         Ketty C. Prard       Z016       Z016	Buying Time, LLC	nination: 10/25/16		15. 15. 10.	·····
Suite 210       Amount         City       State       Zip Code         Washington       DC       20001         Purpose of Expanditure       Category       004         Media Buy       Category       004         Name of Federal Candidate       Support       Office Sought:         Donald J. Trump       XI Oppose       Office Sought:       House         Calendar Year-To-Dato       Yestimet For:       President       Senate       State:         Calendar Year-To-Dato       Yestimet for:       President       Senate       State:         Ophose       Support       Office Sought       141541.00         > SUBTOTAL of Itemized Independent Expenditures       Independent Expenditures       Independent Expenditures         > TOTAL Independent Expenditures       Independent Expenditures       Independent Expenditures         > TotAL Independent Expenditures       Independent expenditures reported horoin were not made in cooperation, consultation, or concutiting only candidate or authorized committee or agent of either, or (if the reporting entity is not a politic arty committoe or its agent.         Ketty C. Ward       Date       10       25       2016	Adaption and the second se	<u></u>			
Washington       DC       20001         Purpose of Expenditure Media Buy       Category/ Type       004       Transaction ID: SE 953229 Date of Disbursoment or Obligation         Name of Federal Candidate       Support       004       10       24       2016         Name of Federal Candidate       Support       Office Sought:       House District:       00         Category/ Type       Work       Oppose       Office Sought:       House District:       00         Category/ Type       Work       Oppose       Office Sought:       House District:       00         Category/ Category       Work       Oppose       Office Sought:       House District:       00         Category/ Category       Work       4369947.93       Disbursement For:       President       Senate       State:         Obstursement For:       Primery       Primery       Gene       Disbursement For:       House       141541.00         Disbursement For:       Primery       Primery       State:       Primery       141541.00         Disbursement For:       Primery       House       Independent Expenditures       Independent Expenditures         Disbursement For:       Independent Expenditures       Independent Expenditures       Independent Expenditures       Independen				Amount	
Durpose of Expanditure       Date of Disbursoment or Obligation         Purpose of Expanditure       Category/ Type       004         Name of Federal Candidate       Support         Donald J. Trump       Office Sought       Office Sought         Category/ Type       Oppose       Office Sought       Disbursoment or Obligation         Category/ Type       Oppose       Office Sought       It house       District:       Office Sought         Category/ Donald J. Trump       Category/ Media Boy       Oppose       Office Sought       It house       District:       Office Sought         Category/ Per Election for Office Sought       4369947.93       Oppose       Disbursement For:       Primary       Primary       It for the specify         a) SUBTOTAL of Itemized Independent Expenditures         b) SUBTOTAL of Unitemized Independent expenditures reported horoin were not made in cooperation, consultation, or concellth, or at the reporting entity is not a politication or utheragent.       Itemized in the reporting entity is not a politication or utheragent.         Kelly C. IPund       Date       10       25       2016	City	State	Zip Code		19691.00
Purpose of Expenditure Media Buy       Category/ Type       004       10       24       2016         Name of Federal Candidate       Support       Office Sought:       House       District:       01         Donald J. Trump       Xi Oppose       President       Senate       State:         Category/ Donald J. Trump       Yi Oppose       Office Sought:       House       District:       01         Category/ Persident       Senate       State:       Disbursement For:       Primary       Xi Gene 2016       Other (specify) >         Category/ Persident       141541.00       Disbursement For:       Primary       Xi Gene 2016       Other (specify) >         a) SUBTOTAL of Itemized Independent Expenditures       141541.00       141541.00       141541.00         b) SUBTOTAL of Unitemized Independent Expenditures       141541.00       141541.00         c) TOTAL Independent Expenditures       1       141541.00         c) TOTAL Independent Expenditures       1       1       1         nder penalty of perfury I certify that the independent expenditures reported heroin were not made in cooperation, consultation, or concertith, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a politicative committee or nigent.         Kelly C. IV.ard       10       25       2	Washington	DC	20001		
Donald J. Trump       Image: Depoint of Object of Data Consultation, or concellarly of perfury I certify that the independent expenditures reported heroin were not made in cooperation, consultation, or concellarly committee or agent of either, or (if the reporting entity is apoint of the reporting entity is apoint or its agent.				10 <sup>11</sup> 24	2016
Calendar Year To-Dato For Election for Office Sought	Name of Federal Candidate		Support	Office Sought: Hou	se District: 00
Per Election for Office Sought       4369947.93       2016       Other (specify) >         a) SUBTOTAL of Itemized Independent Expenditures       141541.00       141541.00         b) SUBTOTAL of Unitemized Independent Expenditures       141541.00         c) TOTAL Independent Expenditures       141541.00         mdar penalty of perfury I certify that the independent expenditures reported heroin were not made in cooperation, consultation, or concelth, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a politic arity committee or its agent.         Ketly C. Wurd       Date       10       25       2018	Donald J. Trump		X Oppose	X President Sent	ate State:
a) SUBTOTAL of Itemized Independent Expenditures			4369947.93	2016	
b) SUBTOTAL of Unitemized Independent Expenditures					
c) TOTAL Independent Expenditures	a) SUBTOTAL of Itemized Independent E	xponditures		an a	141541.00
Inder penalty of perjury I certify that the independent expenditures reported heroin were not made in cooperation, consultation, or conce tith, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a politic arity committee) any political party committee or its agent. Kelly C. W.urd Date 10 25 2016	b) SUBTOTAL of Uniternized Independen	Expenditures	•••••••	n ► 1 s s s s s s s s s s s s s s s s s s	چېدېو، مورد يونديو، د ايولې در اور و
ith, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a politic arty committee) any political party committee or its agent. Kelly C. IV. wil Date 10 25 2016	c) TOTAL Independent Expenditures				
Date 10 25 2016	ith, or at the request or suggestion of, ar	y candidate or authoriz	es reported heroin were ted committee or agent o	not made in cooperation, cor if either, or (if the reporting er	nsultation, or conce nilty is not a politic
Date 10 25 2016	. Kelly C. Wurd				و المنتقد الم
			Date	10 25	2016

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/48 HOUR REPORT OF INDEPE chedule E)		,		PAGE FOR	57 OF 57 SE OF FORM 24/48
ME OF COMMITTEE (In Full) ICCC					ICATION NUMBER V
eck If 🕅 24-hour report 🚺 48-hour rep	ori 🕅 New	report [] Amends repo	ri filed c		·] · [ · · · · · · · · · · · · · · · · ·
Full Name of Payee Buying Time, LLC Date of Dissemin				Date of Public Distrit	
Mailing Address 650 Massachusetts Avenue					2016
Suite 210	,			Amount	
City	Stote	Zip Code			17175.00
Washington	. DC	20001		Fransaction ID : SE- Date of Disbursemer	954373
Purpose of Exponditure Media Buy		Category 7 004 Type 1 004	1	10 21	2016
Name of Federal Candidate	· · · · · · · · · · · · · · · · · · ·	Support	Office \$	Sought: [] Hou	se District:00
Donald J. Trump			Σ.	resident 🗍 Sen	ate Stale:
Colendar Year-To-Date Per Election for Office Sought	میں ہے۔ یہ ہوتی ہوتی ہوتی ہوتی ہوتی ہوتی ہوتی ہو	5894458.07			rimary 🔀 General
Screen Strategies Media, LLC Date of Dissemi Mailing Address 11150 Foirfax Blvd	nalion: 11/01/16			11 ' 01 Amount	1 2016 2016
Cily	State	Zip Code	•		74850.00
Fairfax	VA	22030	т	ransaction ID : SE-9 Date of Disbursemen	
Purpose of Expenditure Modia Buy		Category/ 004 Type 004			2016
Name of Federal Candidate	· · · · · · · · · · · · · · · · · · ·	Support	Office	Sought: Hou	se District: 00
Donald J. Trump		🕅 Оррова	ΪŴ Ι	President Sen	alo State:
Calendar Yoar-To-Dale 1 Per Election for Office Sought		5894458.07	Disburs 2016	اس ده ا	rimary 🔀 Goneral
a) SUBTOTAL of Itemized Independent Exp	oenditures		· • •	یر میری و رو بر میری و رو	92025.00
b) SUBTOTAL of Uniternized Independent (	Expenditures		· • 1	ی <mark>ہ۔</mark> ، - <del>میہ،</del> در ہیر	
c) TOTAL Independent Expenditures			•	ر معنور سور معنور	14333615.05
Inder ponalty of perjury I certify that the invite, or at the request or suggestion of, any arty committee) any political party committee	candidate or authori	res reportad herein ware zod committee or agent c	not mad I sillier,	e in cooperation, con or (If the reporting e	nsultation, or concert ntily is not a political
Kelly C. Ward		Data	7 11 14	02 Y	2016
Signature		Ualu	1	* * 7 *	

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## Image# 201611059037127397 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

Schedule E)	PAGE 11 OF 12 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
	C C00000935
Check if X 24-hour report 48-hour report New report Amends report fied	ידידידין ידידין
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/05/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd	11 05 2016 Amount
Suite 505	
City State Zip Code	58700.00
Fairfax VA 22030	Transaction ID : SE-954453 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ 004 Type	10 / 0 / V V V V V V V V V V V V V V V V
Name of Federal Candidate Support Office	e Sought: House District: 00
Trump, Donald, J., ,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought	ursement For: Primary X General
Full Name of Payeo	Date of Public Distribution/Dissemination
Canal Partners Media, LLC Date of Dissemination: 11/06/16	
Mailing Address 25 Whillock Place	Amount
Suite 200	Benden den den den den den den den den de
CityStateZlp CodeMariettaGA30064	7910.00 Transaction ID : SE-954884 Date of Disbursoment or Obligation
Purpose of Expenditure Media Buy Category/ 004 Type	<sup>M</sup> 11 <sup>M</sup> , <sup>D</sup> 03 <sup>M</sup> , <sup>2016</sup>
Name of Fedoral Candidato	e Sought: House District:00
Trump, Donald, J., .	
Calendar Year-To-Date Disb Per Election for Office Sought 6648199.19	ursement For: Primary X General
(a) SUBTOTAL of Itemized Independent Expenditures	66610.00
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	
Under penalty of perjury I certify that the independent expenditures reported herein were not m with, or at the request or suggestion of, any candidate or authorized committee or agent of eithe party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert er, or (if the reporting entity is not a political
Ward, Kelly, C., . [Electronically Filed] Date	11 06 2016
Signature	

## Image# 201610189033039653 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

(Schedule E)	PAGE 19 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼ C C00000935
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Check if 24-hour report 🗶 48-hour report 🔪 🗋 New report 🗶 Amends re	eport filed on 10 12 14 2018
Full Name of Payee	Date of Public Distribution/Dissemination
Ralston Lapp Media, LLC Date of Dissemination: 10/14/16	10 / 6 YU / Y YYYYY 10 14 2016
Mailing Address 1054 31st Street, NW	
Suito 430	<b></b>
City State Zip Code	
Washington DC 20007	Transaction ID : SE-951677 Date of Disbursement or Obligation
Purpose of Expenditure Media Production Category/ Type	104 10 ' 14 ' 2016
Name of Federal Candidate	1 Office Sought: 🗶 House District: 23
Hurd, William, , ,	President State: TX
Calendar Year To-Date 1648833.65 Per Election for Office Sought	Disbursement For: Primary x General 2016 Other (specify) ►
Full Name of Payee	Date of Public Distribution/Dissemination
Buying Time, LLC Date of Dissemination: 10/14/18	
Mailing Address 650 Massachusetts Avenue, NW	handrand handrand handranderad
Suite 210	Amount
City State Zip Code	53000.00
Washington DC 20001	Transaction ID : SE-952374 Date of Disbursement or Obligation
Purpose of Expenditure Category/ O Type	
Name of Federal Candidate Suppor	rt Office Sought: House District: 00
Trump, Donald, J., . 🔀 Oppose	
Catendar Year-To-Date Per Election for Office Sought	Disbursement For:       Primary       × General         2016       Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	65260.71
(b) SUBTOTAL of Uniternized Independent Expenditures	
c) TOTAL independent Expenditures	
	P Land and Mark Street Annal Annal Print Anna
Under penalty of perjury I certify that the independent expenditures reported herein w with, or at the request or suggestion of, any candidate or authorized committee or age party committee) any political party committee or its agent.	rere not made in cooperation, consultation, or concert int of either, or (if the reporting entity is not a political
	Date 10 18 2016
Signature	hardenal hardenal hardenaderal

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FEC Schedule E (Form 24/28) Rev. 09/2013

## Image# 201610199033071490 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

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(Schedule E)				- PAGE 52	OF 52 FORM 24/48
NAME OF COMMITTEE (In Full) DCCC		······		FEC IDENTIFICATI	
				C = C0000935	أستستعمد
Check if 🛄 24-hour report 🛛 🗶 48-hou	r report X New r	eport 🗌 Amends repo	ort filed on		
Full Name of Payee			Date o	I Public Distribution	Dissemination
The New Media Firm, Inc. Date of Dise	semination: 10/18/16		1	10 1 18	2016
Mailing Address 1730 Rhode Island Av			—   L	ليتغيبا ليتغير	
Suite 213			Amour	רו 	
City	State	Zip Code			3407.87
Washington	DC	20036		of Disbursement or (	
Purpose of Expenditure Media Buy Media Production	<u></u>	Category/ Type			
Name of Federal Candidate		Support	Office Sought	: House	District:00
Trump, Donald, J., .		X Oppose	X Preside	ent Senate	State:
Calendar Year-To-Date Per Election for Office Sought		2613000.20	Disbursement	For: Primary	General
Full Name of Payee				of Public Distribution	/Dissemination
Buying Time, LLC	semination: 10/18/16		L L	10 <b>5 18</b>	2016
Mailing Address 650 Massachusetts		·	L	10 18	2016
Suite 210			Amou	nt	
City	State	Zip Codo			83829.00
Washington	DC	20001		ction ID : SE-95207 of Disbursement or	3
Purpose of Expenditure Media Buy		Calegory/ 004			2016
		Туре		استبسا است	ليمستعسك
Name of Federal Candidate		Support	Office Sough	t: 🚺 House	District: 00
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(a) SUBTOTAL of Ilemized Independen	t Expenditures	<b>S</b> .	• •		87236.87
	•				······
(b) SUBTOTAL of Uniternized Independ	ent Expenditures		·· ▶	بىز <del>قەمىلەت بىلىرىز كېتىك</del>	
(c) TOTAL Independent Expenditures			, <b>1</b>	* * * * *	
(c) to the machine of Cyberolius?"			· • •	-0	1152409.38
Under penalty of perjury I certify that the with, or at the request or suggestion of, party committee) any political party com	any candidate or authoriz				
Ward, Kelly, C., .	IElecti	ronically Filed/ Date	10 10		16
Signature			المقسا	لسغسا اسدت	المحمت
	الأواد المتكاف ببسيري الكاف بجب سيري				

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(4/48 HOUR REPORT OF INDEPEN Schedule E)	DENT EXPEND	TURES		PAGE 52 OF 60 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	n 🕅 New rep	ort	ort filed on	· · · · · · · · · · · · · · · · · · ·
Full Name of Payse Screen Strategies Media, LLC Date of Dissomina	10/25/16		1	of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvg Sulte 505		\	Amou	
City Foirfax	State VA	Zip Code 22030	Trons	64326.00 action ID : SE-953184
Purpose of Expenditure . Modia Buy	******	Calegory/ Type 004		10 21 , 2016
Name of Federal Candidate Donald J. Trump		Support	Office Sough	1 January 1 Janu
Calendar Year-To-Date Par Election for Office Sought		169947.93	2016	t For: Denale State: t For: Definition Primary State: ther (specify) >
Full Name of Payee Buying Time, LLC Date of Dissemina	ntion: 10/25/16		. Date	of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Avonu Suite 210	e, NW		Amou	مورية يعدمكم المعرابي والمحال
City Washington	State DC	Zip Code 20001	Transa	62488.00 Inction ID : SE-953185 of Disbursoment or Obligation
Purposo of Exponditure Media Buy		Category/ ! 004		10 21 2016
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Calendar Year-Tc-Date Por Election for Office Sought	, ) I	4369947.93	Disbursemon 2016 c	N For: [] Primary  X General Nher (specily) ▶
(a) SUBTOTAL of Itemized Independent Expe	nditures		• ►	126814.00
(b) SUBTOTAL of Uniternized Independent Ex	penditures		•	و میسی در مراجع از مراجع از م از میشوند میشوند از مراجع از م از مراجع میشوند از مراجع از م
(c) TOTAL Independent Expenditures		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	•	a an
Under penalty of parjury I certily that the indo with, or at the request or suggostion of, any ce party committee) any political party committee	andidate or authorized	reported herein were committee or agent o	not made in c if either, or (if	ooperation, consultation, or concert the reporting entity is not a political
Kolly C. Ward	•	Date	:	25 2018
Signature				• • • • • • •

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