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December 22, 2016

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

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

Dear Mr. Jordan:

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

## INTRODUCTION

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

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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>

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=g\_4kBjw8r-U</u>. The advertisement in MUR 7176 can be found here: <u>https://www.youtube.com/watch?v=g\_4kBjw8r-U</u>. The advertisement in MUR 7176 can be found here: <u>https://www.youtube.com/watch?v=g\_4kBjw8r-U</u>. The advertisement in MUR 7176 can be found here: <u>https://www.youtube.com/watch?v=WCx3ObETyrE</u>. The advertisement in MUR 7182 can be found here:

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

<sup>&</sup>lt;sup>11</sup> 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=GJCZwJ3tYXw</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: https://www.youtube.com/watch?v=HixNUxf-t80. The advertisement in MUR 7179 can be found here: https://www.youtube.com/watch?v=OpdllznhrF4. The advertisement in MUR 7188 can be found here: https://www.youtube.com/watch?v=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

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

#### A. Commission rules clearly provide for attribution among multiple candidates.

11 C.F.R. § 106.1(a) provides that "expenditures, including in-kind contributions, independent expenditures, and coordinated expenditures made on behalf of more than one clearly identified Federal candidate shall be attributed to each such candidate according to the benefit reasonably expected to be derived."<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>&</sup>lt;sup>13</sup> The advertisement in MUR 7173 can be found here: https://www.youtube.com/watch?v=RriiljNAe-I. The advertisement in MUR 7187 can be found here: https://www.youtube.com/watch?v=8DN@EgLEECA. See Exhibit B. <sup>14</sup> See Exhibit A.

<sup>&</sup>lt;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). <sup>19</sup> *Id*.

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

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

In attributing the cost of a communication among multiple candidates, the Commission does not look to whether or not the segment associated with a particular candidate contains express advocacy. For example, in Advisory Opinion 2004-01, issued to Bush-Cheney '04, Inc. and Alice Forgy Kerr for Congress, the Commission understood that the ad would "not mention or refer to the President's candidacy for re-election [or] expressly advocate the election nor defeat of any presidential candidate."<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>23</sup> FEC Adv. Op. 2004-01 (Bush/Kerr).

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

<sup>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 cach 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.

<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>&</sup>lt;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 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.

#### С. 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

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<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>&</sup>lt;sup>34</sup> See FEC Adv. Op. 2004-37 (Waters) at 2 (holing that payment for a "brochure would not constitute support of, or be an in-kind contribution to, the Federal candidates listed in the brochure, provided that the Federal candidates provide reimbursements in the appropriate amount in a timely manner"); FEC Adv. Op. 2004-01 (Bush/Kerr) at 6 (holding that "if the Bush-Cheney Committee reimburses the Kerr Committee for its attributable share of the expenses, there is no contribution"); FEC Adv. Op. 2004-29 (Akin). <sup>35</sup> See Exhibit B.

<sup>&</sup>lt;sup>36</sup> Id.

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

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

The ads in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not expressly advocate Trump's defeat. Accordingly, the portions of these ads' costs that were attributable to Trump were reported by the party as operating expenditures and not as independent expenditures. The definition of "express advocacy" is clearly set forth in the Commission's regulations, and when a communication does not meet this definition, the Commission has repeatedly held that the communication does not constitute an independent expenditure.<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>41</sup> 11 C.F.R. § 100.22.

<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. <sup>39</sup> 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).

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), <u>https://www.youtube.com/watch?v=Ch4ToJp3Br0</u>.

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

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

TRUMP: We're going to build a wall.

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

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

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

WILL HURD: A wall absolutely makes sense.

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

[DISCLAIMER].45

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

<sup>&</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>17</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>&</sup>lt;sup>50</sup> FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of

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

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

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

# CONCLUSION

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

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

Very truly yours,

Mr. R-

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

- 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 Advertisementy. I was also in contact, directly or indirectly through my staff, with each of the Campaigns involved in these Advertisements.
- 3. This program was conceived by DCCC without any request, suggestion, or assent by HFA or its agents. DCCC believed that the advertising program would be an effective way to promote our Democratic House candidates and the Democratic Party, given the intense opposition among Democratic voters to Donald Trump and the policies and positions he espoused.
- 4. I managed every aspect of the creation, production, and dissemination process for each of these Advertisements, starting with script development through the advertising buying phase of each Advertisement. To that end, with a core group of DCCC staff, I worked directly with each Campaign and advertising vendor to draft each script and produce and edit each Advertisement.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on this  $\frac{2}{\sqrt{2}}$  day of December, 2016.

icheel Ian Russell

Exhibit B

# -12-04447015-1500

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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 109105 OF 109107 FOR LINE 25 OF FORM 3X

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(To be used only by Political Committees in the General Election)

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FEC Schodule F (Form 3X) Rev. 05/2018

#### 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

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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 109107 OF 109107

DCCC Has your committee been designated to make coordinated expenditures by a political party committee?          K       YES       NO	(To be used only	y by Political Committees in the Gener	ral Election) FOR LINE 25 OF FORM 3X
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Nelson, Tom,       Senate       District:       De         Aggregate General Election       33700.00       Transaction ID : SF-353282       Purpose of Expanditure         Full Name (Last, First, Middle Initial) of Each Payee       Memo Item       Purpose of Expanditure       Category/ Type         City       State       Zip Code       Amount         Name of Faderel Candidate >       State       District:       Amount         Aggregate General Election       Expenditure       City       State       District:         Presidential       District:       Presidential       Amount       Category/ Type         Full Name (Last, First, Middle Initial) of Each Payee       Memo Item       Purpose of Expanditure       Category/ Type         Full Name (Last, First, Middle Initial) of Each Payee       Memo Item       Purpose of Expanditure       Category/ Type         City       State       Zip Code       Amount       Category/ Type       Category/ Type         Full Name (Last, First, Middle Initial) of Each Payee       Memo Item       Purpose of Expanditure       Category/ Type         City       State       Zip Code       Memo Item       Purpose of Expanditure       Category/ Type         Name of Federal Candidate Supported       Office Sought:       House       State:       A	Alexandria V/	1 .	10 24 2016
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FEC Schedule F (Form 3X) Rev. 05/2018

#### 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 General Election) NAME OF COMMITTEE (In Full) DCCC Has your committee been designated to make . Full Name of Subordinate Committee coordinated expenditures by a political party committee? DCCC NO NO X YES If YES, name the designating committee: Mailing Address 430 South Capitol Street, SE 2nd Floor **Democratic National Committee** City State **ZIP Code** Washington DC 20003-4024 Full Name (Last, First, Middle Initial) of Each Payee Memo Item Purpose of Expenditure Media Services Buying Time, LLC Category/ Mailing Address 650 Massachusetts Avenue, NW Туре Suite 210 Date Zip Code State 10 11 2016 Washington DC 20001 Name of Federal Candidate Supported Office Sought: × House State: WI Amount Nelson, Tom, , , Senate District: 08 32700.00 Presidential Aggregate General Election 32700.00 Expenditure for this Candidate > Transaction ID : SF-951664 Full Name (Last, First, Middle Initial) of Each Payee Purpose of Expenditure Memo Item **Media Services** Adelstein & Associates LLC Category/ Mailing Address 222 West Ontarlo Street, Suite 600 Туре Date State Zip Code 10 13 2016 Chicago 1L 60654 Name of Federal Candidate Supported Office Sought: × House State: 1 Amount Schneider, Bradley, Scott., Senate District: 10

		Presidential I		48100.00
Aggregate General Election Expenditure for this Candidate Transaction II	) : SF-951461	48100.00	,	
Full Name (Last, First, Middle Initial) of Eac Mailing Address	h Payoe	🗍 Memo Item	Purpose of Expenditure	Category/ Type
			Date	
City .	State	Zip Code		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
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City

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

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PAGE 63515 OF 63518

(To	be use	d only	Бу Ро	olitical Com	nittees in the Gen	aral Election	) FOR L	NE 25	OF FORM 3X
NAME OF COMMITTEE (In Full)								•	
DCCC	•••						•		
Has your committee boon designated to ma	ke	1	Full N	lame of Subo	ordinate Committee				
coordinated expenditures by a political party x YES NO	commi	ittee?·							
If YES, name the designating committee:			Mailin	g Address	430 South Capitol S	Sireet, SE			
Democratic National Committ	ee &				2nd Floor				
California Democratic Party			City Wast	nington			Slate DC	ZIP C 2000	orie 3-4024
Full Name (Last, First, Middle Initial) of	Each P	ayee			Merno Item	Purpose of	Expenditure		
The New Media Firm, Inc	•					Media S	ervices		Catanatul
Mailing Address 1730 Rhode Island Ave	NW					Date			Category/ Type
Suite 213		State		Zip Code			_		
Washington		DC		20036		09	20		2016
Name of Federal Candidate Supported	Office	Sough	t: x	House	State: CA	Amount			· · · · · · · · · · · · · · · · · · ·
Applegate, Doug, Loren, .				Senale	District: 49				
	<u> </u>			Presidential			•	, 9	1200.00
Aggregate General Election Expenditure for this Candidate >	•	,		91200					
			tion ID	SF-949904					
Full Name (Last, First, Middle Initial) of	Each P	ayee		•	Memo Item	Purpose of Media S	Expenditure		
Screen Strategies Med	lia, Ll	_C				Wedia J	6171663		_
Mailing Address 11150 Fairfax B		<u> </u>		<u> </u>					Category/ Type
Suite 505						Date			
City		State		Zip Code			•		
Fairlex		VA		22030		09	23	:	2016
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Caforio, Bryan ,				Senate	District: 25				
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Mailing Address 11150 Fairlex Blvd						Date	<u></u>		Тура
Suite 505		Slate		Zip Code		17318			
Fairfax	.	VA		22030		09	28	20	6
Name of Federal Candidate Supported	Office		1: #	House	State: CA		·····		
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Aggregate General Election							,	•	-
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FEC Schedule F (Form 3X) Rev. 05/2016

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# Exhibit C

#### BEFORE THE

#### FEDERAL ELECTION COMMISSION

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

I, Maura Johnson, do declare and state as follows:

- During the 2016 election, as a Media Supervisor at GMMB, Inc. ("GMMB"), I provided media buying services for Ralston Lapp Media, the consultant working with Stephanie Murphy for Congress. Through that position, I am familiar with the matters discussed herein.
- 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:

11 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  $\overline{21}$  day of December, 2016.

#### **BEFORE THE**

#### FEDERAL ELECTION COMMISSION

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

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

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

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

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

David Dixon

Dixon / Rydan Da

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**Exhibit** D

24/48 HOUR REPORT OF INDEPENDENT EXPE	ENDITURES	PAGE 9 OF 9
(Schedule E)		PAGE 9 OF 9 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		
DCCC		C C00000935
		hundres the destination of the start
Check if 📋 24-hour report 💢 48-hour report 💢 New	w report [] Amands rep	ort filed on
Full Name of Payee		Date of Public Distribution/Dissomination
Old Towne Media Date of Dissemination: 10/19/16		
Malling Address 4507 Penwood Dr		
		Amount
City State	Zlp Code	
Alexandria VA	22310	Transaction ID : SE-952383 Date of Dispursement or Obligation
Purpose of Expenditure Media Buy	Catogory/ Type 004	10 1 18 2016
Name of Federal Candidata	<u> </u>	
Donald J. Trump	Support	Office Sought: House District: 00
	Oppose	President State:
Calendar Year-To-Date	2742321.20	Disbursement For: Pilmary X General 2016 Other (specify) ▶
Full Name of Payee		Date of Public Distribution/Dissemination
AL Media, LLC Date of Dissemination: 10/19/16		LALAL LOLD , LOLD
	<u></u>	
		Amount
Sulte 600 City State	Zip Code	R1321.00
Chicago IL	60654	Transaction ID : SE-952867 Date of Disbursement or Obligation
Purpose of Exponditure	Category/	"""
Media Buy	Type 004	10 14 2016
Name of Federal Candidate	Support	Office Scught: House District: 00
Donald J. Trump		President Sonate State:
		Disbursement For: Primary X General
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(c) TOTAL Independent Expenditures		ي مسير محيود دوست من من محير مان السير مان المريد العالي . 
		273146.39
Under ponalty of perjury I certify that the independent expendit with, or at the request or suggestion of, any candidate or autho party committee) any political party committee or its agent.		
Kelly C. Ward		1. a
	. Date	10 21 2016
Signature		·
		FEC Schedule E (Form 24/28) Rev. 09/2013

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24/48 HOUR REPORT OF INDEPEND (Schedule E)	ENT EXPEND	ITURES		PAGE 48	OF 60
· · · · · · · · · · · · · · · · · · ·				FOR SE OF FO	ORM 24/48
NAME OF COMMITTEE (In Full) DCCC				FEC IDENTIFICATION	NUMBER V
				C C00000935	
Check if 🖄 24-hour report [] 48-hour report	New rep	ort [] Amends repo	ort filed on		· · · · · · · · · · · · · · · · · · ·
Full Name of Payee Screen Strategies Media, LLC			1.	of Public Distribution/Dis	
Date of Disseminatio	n: 10/24/16		1	10 , 24 /	2016
Mailing Address 11150 Fairfax Blvd Suite 505			. Amol	int	
City	Stato	Zip Code	` <sup>-</sup>		45000.00
Fainfax	VA	22030		saction ID : SE-952072 of Disbursement or Oblig	ليسرو أأعسلت
Purpose of Expenditure Media Buy	<u></u>	Category/ Type 004			2016
Name of Federal Candidate		Support	Office Sough	ni: House Dist	Irict: 00
Donald J. Trump			Presid	ent Senato Si	late:
Calendar Year-To-Date	 , )36	53174.61	Disbursemen 2016	nt For: [_] Primary Diner (spocify) ▶	General
Full Name of Payee			· · · · · · · · · · · · · · · · · · ·	of Public Distribution/Dis	semination
AL Media LLC Date of Disseminatio	n: 10/24/16			10 1 24	2016
Mailing Address 222 W Ontario St			'	سے ہے	
Suite 600			Amou	int	-
City	Stale	Zip Code	'		31250.00
Chicago	iL	60654		action ID : SE-953187 of Disbursement or Oblig	yation
Purpose of Expenditure Media Buy		Category/ 004 Type 004		10 21	2016
Name of Federal Candidate		Support	Office Sough	ht: House Dist	trict: 00
Donald J. Trump		X Oppose	X Presid	ent Sonale St	late:
Calendar Year-To-Date Per Election for Office Sought	ی به در ورید.	3653174.61	Disbursemer 2016	nt For: [] Primary Diher (specify) ▶	X General
(a) SUBTOTAL of Itemized Independent Expendi	luros		• •	176	250.00
(b) SUBTOTAL of Uniternized Independent Expe	nditures		• ► i	میلی و المعنی را مالی م	
			r	م الم الم الم الم الم الم الم	
(c) TOTAL Independent Expenditures			•	I = ℓ − ℓ	
Under ponally of perjury I certify that the indepe with, or at the request or suggestion of, any cano party committee) any political party committee or	didale or authorized				
Kelly C. Ward			., n ,	0 6 4 4 4 5	• .
Signature		Date	10	25 2016	

FEC Schodule E (Form 24/28) Rev. 08/2013

1/48 HOUR REPORT OF INDEP Ichedule E)	ENDENI EXPENI	JITURES		PAGE 51 OF 6
AME OF COMMITTEE (In Full)				FEC IDENTIFICATION NUMBER
	I			C1 600000935
heck If 🔀 24-hour report [ ] 48-hour n	eport 🔀 New ro	port [] Amends rep	ort filed on	
Full Name of Payse AL Media LLC				of Public Distribution/Disseminatio
Date of Disser Malling Address 222 W Ontario St	mination: 10/25/16			10 25 2016
Suite 600			Amo	punt
City	State	Zlp Code	· ·	
Chicago	۹L	60654		saction ID : SE-953228
Purpose of Expenditure Modia Buy	, ,	Category/ Type 004	;	10 24 2016
Name of Federal Candidate		Support	Office Soug	ght: House District: 00
Donald J. Trump		X Oppose		dent Senate State:
Calendar Year To-Date Per Election for Office Sought	4	369947.93	Disbursemo	ont For: [ Primary 🔀 Gene Other (specify) ►
Full Name of Payee Canal Partners Media, LLC				o of Public Distribution/Dissomination 10 1 25 2016
Mailing Address 25 Whitlock Place	nination: 10/25/16		}	10 25 2016
Suite 200			Amo	bini
City	State	Zip Code		184082.00
Marialla	GA	30064		saction ID : SE-952497 a of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004		10 <sup>10</sup> 19 2016
Name of Federal Candidate		Support	Office Soug	pht:
Donald J. Trump		🕅 Oppose	Presi	dent [ Senato State:
Calendar Year-To-Date Per Election kir Office Sought	»	4369947.93	Disbursame	ent For: [ ] Primary 🔯 Gene Other (specify) Þ
(a) SUBTOTAL of Itemized Independent E			• •	193082.00
(c) TOTAL Independent Expenditures			•	پیست مسلم میں میں میں اسل میں اسل میں اسل میں
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 authorized	s raported herain were d committee or agent o	not made in f either, or (if	cooperation, consultation, or conce I the reporting entity is not a politic
Kelly C. Ward			чы <i>г</i> 10 ј	25 2016

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

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	<b>1</b> 220
(Schedule E)	PAGE 23 OF 23 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER
	[C] C0000035
Check if 🔀 24-hour report [] 48-hour report [] Ame	nends report filed on
Full Nume of Payes Moore Campaigns, LLC	Date of Public Distribution/Dissemination
Mailing Address 447 Irving SL NW	10 28 2016 Amount
City State Zip Codo Washington DC 20010	4472.36 Transaction ID : SE-854234 Date of Disbursement or Obligation
Purpose of Expenditure Mail Services Category Type	
Name of Federal Candidato	Support Office Sought: House District: 00
Donald J. Trump 🔀 Op	Oppose Resident Senate State:
Calendar Year-To-Date 4593586.81 Per Election for Office Sought	2016
Full Name of Payee	Dato of Public Distribution/Dissemination
AL Media LLC	10 28 2016
Mailing Address 222 W Ontario St	
Suito 600	
City State Zip Code	30525.00
Chicago IL 60654	Transaction ID : SE-953928 Date of Disbursoment or Obligation
Purposo of Expanditure Media Buy Type	004 10 26 2016
Name of Federal Candidote	Support Office Sought:  _  House District:00
Danald J. Trump	Oppose X President Sunate State:
Calendar Year-To-Date 4593586.81 Per Election for Ottice Sought	Clabursement For: [] Primary [X] General 2016 [] Other (specily) ▶
(e) SUBTOTAL of itemized independent Expenditures	ام جې د د او و و و و و و و و و و و و و و و و
(b) SUBTOTAL of Unkemized independent Expenditures	مد و سو هم سوید و مربعہ مرتبط میں اور ایسن اور اور اور اور اور اور اور اور اور اور
(c) TOTAL Indopendent Expenditures	الم
Undor panally of parjury I corilly that the indopendent expenditures reported here with, or at the request or suggestion ol, any candidate or authorized committee or party committee) any political party committee or its agent.	ein were not made in cooperation, consultation, or concert or agent of either, or (if the reporting entity is not a political
Kelly C. Ward	ኖላ ወር የነበም በደላጀው ቆዳታል እንዲያ
Signature	Date ; 10 29 2016
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(Schedule E)	PAGE 7 OF 8 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER V
DCCC	С сообооэз5
Check If 🗶 24-hour report [] 48-hour report 🖉 🗶 New report [] Amends report filed	on [1] T.1] / [0] T.0] / [/] T.1]
Full Name of Payee Adelstein & Associates LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/31/16	10 31 2016
Mailing Address 222 West Ontario Street, Suite 600	Amount
City State Zip Code	80000.00
Chicago IL 60654	Transaction ID : SE-954371 Date of Disbursement or Obligation
Purpose of Expenditure Category/ Media Buy 004	10 28 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Trump, Donald, J., .	President Senate State:
Calendar Year-To-Date Disbu Per Election for Office Sought 2016	Insement For: Primary X General
Full Name of Payee	Date of Public Distribution/Dissemination
Adelstein & Associates LLC Date of Dissemination: 10/31/16	10 31 2016
Mailing Address 222 West Ontario Street, Suite 600	Amount
City State Zip Code	67387.50
Chicago IL 60654	Transaction ID : SE-954372 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ 004 Typo	10 28 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Trump, Donald, J., ,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought	ursement For: Primary  ¥ General
(a) SUBTOTAL of Itemized Independent Expenditures	147387.50
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	
Under penalty of perjury I certify that the independent expenditures reported herein were not may 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.	
Ward, Kelly, C., [Electronically Filed] Date	0 31 2016
Signature	inner Berertenen herenderen freinigen ihren ihre

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

			PAGE 51 OF 52 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			FEC IDENTIFICATION NUMBER V C C00000935
Check il 📜 24-hour report 🛛 🔀 48-hour report	New	report Amends rep	a a n a train on filed on
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination:	10/18/16	<u></u>	Date of Public Otstribution/Oissemination
Mailing Address 11150 Fairfax Blvd Suite 505			Amount
· · · · · · · · · · · · · · · · · · ·			
City Fairlax	Stale VA	Ziu Code 22030	134898.50 Transaction ID : SE-952377 Date of Disbursement or Obligation
Purpose of Expenditure Madla Buy		Category/ Type 004	10 11 2016
Name of Federal Cundidate		:Support	Office Sought: House District: 00
Donald J. Trump	•	X Oppose	President Senate State:
Calendar Year To-Date Per Election for Office Sought	,	2613000.20	Disbursement For: Primary X General 2016
Full Name of Payee			Date of Public Distribution/Dissemination
Kully Hall, LLC			
Date of Dissemination; Mailing Address 1932 1st Avu, Suite 203	, ,		10 18 2015 Amount
Сіну	State	Zip Code	6225.00
Scattle	WA	98101	Transaction ID : SE-952379 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production	·····	Category/ Type	10 <sup>1/2</sup> 18 <sup>1/2</sup> 2016
Name of Foderal Candidate		Support	Office Sought: : House District: 00 .
Danald J. Trump		X. Oppose	X President ; Senate State:
Calendar Year To-Date Per Election for Office Sought	3	2613000.20	Disbursement For: Primary X General 2016 Other (specify) ►
(a) SUBTOTAL of Itemized Independent Expenditu	#es		
(b) SUBTOTAL of Uniternized Independent Expend	dilures		" <b>&gt;</b>
(c) TOTAL Independent Expenditures		······	"►
Under penalty of perjury I certify that the independ	dent expenditu date or author	ires reported herein were ized committee or agent (	not made in cooperation, consultation, or concert of either, or (if the reporting entity is not a political
with, or at the request or suggestion of, any candic party committee) any political party committee or its			
		Dat	a 10 19 2016

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1/48 HOUR REPORT OF INDEPEN	IDENT EXPE	NDITURES			PAGE 4	B OF 60
chedule E)						F FORM 24/48
AME OF COMMITTEE (In Full)		- <u></u>		FEC I	DENTIFICAT	ION NUMBER
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Full Name of Payee			Date of		c Olstribution	VDissemination
Screen Strategies Media, LLC Date of Dissemin	ation: 10/24/16			10	·	
Mailing Address 11150 Fairfax Blvd						
Suite 505			Amou	ni -		
City	Slate	Zip Code				45000.00
Fairfax	VA	22030			) D:SE-9520 ursement of	
Purpose of Expanditure Media Buy		Calegory/ Type 004	н 1	10	· 5 0 17	2016
Name of Federal Candidate	· · · · · · · · · · · · · · · · · · ·	Support	Office Soughi		House	District: 00
Donald J. Trump		X Oppose	-			State:
						y 🗙 Genera
Calendar Year-To-Data Per Election for Office Sought	;	,3653174.61	1 2016		eäly) ▶	
Full Name of Payee			Date d	of Publi	c Distribution	VDissemination
AL Media LLC	Non: 10/24/15					2016
Date of Dissemini Malling Address 222 W Optavio St	JUGN. 10/24/10			טו	24	2016
			Amoui	ni		
Suite 600		· · · · · · · · · · · · · · · · · · ·				
City	State	Zip Code	:		!.	131250.00
Chicago	u.	60654			D:SE-95318	
Purpose of Expenditure Media Buy		Category/ 004		10	21	2016
Name of Federal Candidate		Support	Office Sough	;	House	District: 00
Donald J. Trump			-		Senale	
Calendar Year-To-Date Per Election for Office Sought		3653174.61	Disbursement 2016	For:	L Prinar	A REAL PROPERTY AND A REAL
		, . 	: C	iher (sp	oecify) 🕨 🔔	
(a) SUBTOTAL of Itemized Independent Expo	ndiures		••• <b>•</b>			176250.00
(b) SUBTOTAL of Uniternized Independent E:	xoenditures					
			•	i.	•	•
(c) TOTAL Independent Exponditures			··· ►	;	:	
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Under penalty of perjury I cartily that the indu- with, or at the request or suggestion of, any o party committee) any political party committee	andidate or author	ures reported herein were lized committee or agent	e not made in c of either, or (if t	ooperal he repo	ion, consulta	ation, or concer is not a politica
Kelly C. Wurd			. 4			
		Dat	ค 10	25	20	:6
Signature						
<u></u>	· · · · · · · · · · · · · · · · · · ·	i	F	EC Sch	dule E (Form	24/28) Rev. 09/2

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24/48 HOUR REPORT OF INDEPE	NDENT EXPEN	DITURES	PAGE 52 OF 60
(Schedule E)			FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	· · · · · · · ·	······································	FEC IDENTIFICATION NUMBER
DCCC			С соооооэз5
Check if 🔀 24 hour report 🔡 48 hour rep	port X New a	cport Amends rep	ort filed on
Full Name of Payer Screen Strategies Media, LLC			Date of Public Distribution/Dissemination
Date of Dissemi	inution: 10/25/16		10 25 2016
Mailing Address 11150 Fairfax Blvd			Amount
Suite 505		·	
City	State	Zip Code	64326.00
Fəirləx .	VA	22030	Transaction ID : SE-953184 Date of Disbursement or Obligation
Purpose of Expanditure Madia Buy		Calegory/ Type 004	10 21 2016
Name of Federal Candidate		Support	Office Sought: House District: 00
Donald J. Trump		X Oppose	President Sanate State:
Calendar Year To-Date Por Election for Office Sought	.ı t	4369947.03	Disbursement For: Primary X General 2016 Other (specify)
Full Name of Payes	······································		Date of Public Distribution/Dissemination
Buying Time, LLC	nation: 10/25/16		10 25 2016
Mailing Address 650 Massachusetts Ave	······································		, 10 25 2010
Suite 210			Amount
City	State	Zin Code	62488.00
Washington	DC	20001	Transaction ID : SE-953185 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10 21 2016
Name of Federal Candidate	<u></u>	Support	Office Sought: House District: 00
Donald J. Trump	<u>.</u>	X Oppose	President State:
Calendar Year-To-Date Per Election for Office Sought		4369947.93	Disbursement For: Primary
(a) SUBTOTAL of Itemized Independent Exp (b) SUBTOTAL of Unitemized Independent, (c) TOTAL Independent Expenditures	Expendilures		126814.00
- Under penalty of perjury I certify that the in with, or at the request or suggestion of, any party committee) any political party committee	candidate or authorize	es reported herein were ed committee or agént d	not made in cooperation, consultation, or concert if either, or (if the reporting entity is not a political
Kelly C. Ward	•	Date	10 25 2016
Signature	·· · ·	,	· · · · · · · · · · · · · · · · · · ·

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

Fairlax       VA       2030       Transaction to: SE-95293 Date of Disturgement or Obligation         Purpose of Federal Candidate Donald J. Trump       Category Type       004       10       25       201         Name of Federal Candidate Der Election to: Office Sought       Serete       State - Disburgement For:       House       Ulsivicit:         Calendar Year-To-Date Per Election to: Office Sought       1976520.65       Disburgement For:       Primary       X C         Mailing Address       222 W Ontario S1 Suite 600       State       Date of Disburgement or Obligation       10       31       201         Mailing Address       222 W Ontario S1 Suite 600       State       Category/ Type       Date of Disburgement or Obligation         Purpose of Expenditure Media Buy       Calegory/ Type       Calegory/ Type       Transaction ID: SE-95473       State         Name of Foderal Candidate Donald J. Trump       Suite 200       Calegory/ Type       Transaction ID: SE-95478       State of Disburgement or Obligation         Name of Foderal Candidate Donald J. Trump       Calegory/ Type       Calegory/ Type       House       Disburgement For:       Primary X C         Calendar Year-To-Date- Por Election for Office Sought       4379520.65       Disburgement For:       Primary X C       C         (c) TOTAL Indopundent Expenditures       4379520.65	48 HOUR REPORT OF INDEPE hedule E)	NDENT EXPEN	DITURES		PAGE 8	بمهدا المركان الأناق المحادثة التقاريس مساك
CCC               Construction report             48-hour report             49-hour             49	ME OF COMMITTEE (In Full)		<u></u>			
ack II ∑ 24-hour report       48-hour report       ∑ New report       Amends report filed on         Full Name of Payee       Date of Disacmination: 10/21/16       Date of Public DistributionQbasemin         Sube Sos       Sube Sos       Sou         City       Sure       Zip Code         Partings       VA       2200         Name of Federal Candidate       Sube Sos       Sou         Darte of Disacmination: 10/21/16       Transaction ID: SE 59233       Sou         Propose of Expanditure       Support       Office Sought       House Office Sought         Propose of Expanditure       Support       Office Sought       House Office State         Calegory       Oppose       Office Sought       House Office State         Calendar Yea-To-Date       Presteint       Senate       State         Citingo       IL       60854       Oner (specify) >       Oner (specify) >         Full Name of Payee       State Of Dissemination: 10/31/16       Transaction f0: SE 4:54176       Dist of Distrustrement for: 1       Primary X C         Citingo       IL       60854       Oner (specify) >       Oner (specify) >       Inform         Purpose of Foderal Candidate       Support       Office Sought       House       Distride:         Dane					-	ION NUMBER
Full Name of Payee     Date of Disacrimination: 10/31/16       Mailing Address 11150 Fairlas Bivd     10 31 201       Suite S05     Amount       City     State       Purpose of Expenditure     Category       Mailing Address     VA       2010     State       Purpose of Expenditure     Category       Maile Buy     Category       Name of Paderal Candidate     Suppose       Date of Dissemination: 10/31/16     Category       Date of Dissemination: 10/31/16     Category       Date of Dissemination: 10/31/16     Category       Category     10 25 200       Full Name of Payee     Category       Category     10 25 200       Full Name of Payee     Category       Category		•		1	C C00000935	_ ·
Screen Strategies Media, LLC       Date of Dissumination: 10/31/16       10 31 201         Mailing Address 11150 Parkax Bivd       Amount         Sube 505       Zip Code         City       State       Zip Code         Purpose of Expenditure       VA 22030       Transaction to : 5E-953283         Purpose of Expenditure       Category       00 10 Extrustement of Colligation         Name of Federal Candidate       Support       Office Sought : - House Oligation         Date of Dissemination: 10/31/16       Date of Dissemination: 10/31/16       Image: Support         Full Name of Payee       Att Media LLC       Date of Dissemination: 10/31/16         Att Media LLC       Date of Dissemination: 10/31/16       Date of Dissemination: 10/31/16         Mailing Address       222 W Ontario S1       Support         Suite 600       It. 60854       Transaction io : 5E-95478         Date of Dissemination: 10/31/16       Transaction io : 5E-95478	ck if 🔀 24-hour report 48-hour re	port X New r	eport Arnends rep	urt filed on	4 ° 7. 2	¥ ,
Mailing Address 11150 Fairfax Bivd Suite 505       Amount         City       State       Zip Code         Fairfax       VA       22030         Purpose of Expenditure       Caregory       0.4         Mailing Address       Supcont       Office Sought         Purpose of Expenditure       Supcont       Office Sought         Daneld J. Trump       X Oppose       President         Daneld J. Trump       X Oppose       Disbursement or Obligation         Date of Disbursement or Obligation       State       Disbursement For:         Per Election for Office Sought       4979520.05       Office Sought         Full Name of Payee       Att Media LLC       Date of Disbursement or Obligation         Att Media LLC       Date of Disbursement or Obligation       10       31       201         Mailing Address       222 W Ontario SI       State       Date of Disbursement or Obligation       10       31       201         Mailing Address       222 W Ontario SI       State       Date of Disbursement or Obligation       10       31       201         Mailing Address       222 W Ontario SI       State       Disbursement or Obligation       1057       27       201         Mailing Address       0 Foderal Candidate       Support <td>Screen Strategies Media, LLC</td> <td></td> <td></td> <td></td> <td></td> <td></td>	Screen Strategies Media, LLC					
Suite 505     Amount       City     State     Zip Code     5500       Fairfax     VA     22030     Tansaction 10: 55-952325       Date of Expenditure     Category     04     10     25     201       Name of Federal Candidate     Supcort     Office Sought     Heuse     Ulstursement or Obligation       Date of Federal Candidate     Supcort     Office Sought     Heuse     Ulstursement for:     President       Calendar Year-To-Date     Oppose     Other (specify) >     Other (specify) >     Calendar Year-To-Date       Full Name of Payee     AL Media LLC     Date of Disbursement For:     Primary     Calendar Year-To-Date       Suite 600     State     Zip Code     Transaction 10: SE-95478       Mailing Address     222 W Ontario SI     Transaction 10: SE-954778       Suite 600     State     Zip Code     Transaction 10: SE-954778       Date of Foderal Candidate     Support     Office Sought     11597       Onaid J. Trump     Calegory/     Yop<004		inalion: 10/31/16		!	10 31	2016
Fairfax     VA     2000     Transaction to: SE-95223 Date of Disturgement of Obligation       Purpose of Expenditure Midia Buy     Category Type     004     10     25     201       Name of Federal Candidate Der Disturgement for:     Surport Prestein     Senate State:     Senate State:     Disturgement for:     Primary     C Category       Category     Category     Category     Office Soupht:     House     Usit ct:       Date of Federal Candidate     Surport     Office Soupht:     House     Usit ct:       Category     Category     Category     Category     Category     Category     Category       Category     1976520.65     Distribution/Dissemin     Senate     State:     Distribution/Dissemin       AL Media LLC     Date of Dissemination: 10/3 1/16     Date of Distribution/Dissemin     Name of Specify) >     Amount       Mailing Address     222 W Ontario S1     Suite 600     It     Senate     Senate       Chicago     It     6054     Transaction ID: SE-95475     Date of Disbusement of Obligation       Purpose of Expenditure     Support     Category/ Type     Office Sought:     House     Disbusement Fo:     Yes/Sederic       Name of Foderal Candidate     Support     Category/ Type     Category     Sonate     State:     Sonate				Amoun	r -	
Purpose of Expenditure Media Buy       Calegory Type       Date of Diskursement or Obligation         Name of Federal Candidate       Supcort       Office Sought:       House       Disture:         Date of Diskursement for:       President       Senate       State:         Calegory       X       Oppose       Office Sought:       House       Disture:         Calegory       X       Oppose       Office Sought:       House       Disture:       Disure:       Disture:	City	State	Zip Code			55000.00
Purpose of Expenditure       Category       0.4       10       25       201         Name of Federal Candidate       Support       Office Sought:       House       Disturcament For:       President       Senate	Fairtax	· VA	22030	Transa	ction ID : SE-9532	93 Obligation
Donald J. Trump       X Oppose       X Presklent       Senate       Stete: -         Calentiar Yea-To-Date Per Election for Office Sought       4978520.65       Disburcament For:       Primary       X C         Full Name of Payeo AL Media LLC       Date of Dissemination: 10/31/16       Date of Public Distribution/Dissemin "10" 31" 201         Mailing Address       222 W Ontario S1 Suite 600       Date of Dissemination: 10/31/16       Date of Public Distribution/Dissemin "10" 31" 201         City       State       Zip Code       Transaction 10 : 5E-354178         Date of Dissemination:       004       10" 27" 201         Purpose of Expenditure Medie Buy       Category/ Type       Othice Sought:       House District: Name of Foderal Candidate         Danald J. Trump       Support       Office Sought:       House District: X; Oppose       Disbursement For:       Primary X C         Category/ Per Election for Office Sought       ,       4379520.55       Disbursement For:       Primary X C         SubstortAL of Itomized Independent Expenditures       ,       4379520.55       Disbursement For:       Primary X C         c) TOTAL Independent Expenditures       ,       ,       4379620.55       Disbursement for:       433711.         Inder panelity of penjury I certily that the independent expenditures reported herein were not made in cooperation, consultation, or		، <sub>ما</sub> ریند که می المی المی المی المی المی المی المی ا	Calegory/ Type 004			
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Mailing Address       222 W Ontario SI Suite 600       Amount         City       State       Zip Code         Chicago       IL       60854         Purpose of Expenditure Media Buy       Category/ Type       004       Transaction i0 : SE-954178 Date of Disbusement or Obligation         Name of Foderal Candidate       Support       Category/ Type       004       "10" 3 27" 201         Name of Foderal Candidate       Support       Office Sought:       House District:         Donald J. Trump       Category/ Sclendar Year To-Date. Per Election for Office Sought       Office Sought       President         Catendar Year To-Date. Per Election for Office Sought       4379620.65       Dibbusement For: i'       Primary X C         SubBTOTAL of Itomized Independent Expenditures       170875.0         b) SUBTOTAL of Uniterrized Independent Expenditures       170875.0         c) TOTAL Independent Expenditures       433711.         Inder penelty of penjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or consultation or any connditures or autorized commitree or agent of		ination: 10/31/16		, n	9 · · · · · · · · · · · · · · · · · · ·	2016
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hith, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a party committee) any political party committee or its agent.	c) TOTAL mospensent Expenditures			" <b>Þ</b>	, ,	433711.75
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Date 10 31 2016	Kelly C. Ward				6 7 · · ·	
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FEC Schedule E (Form 24/28) Rev. 09/2013

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

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(Schedule E)	OF INDEPENDENT	EXPENUI	IUNES			PAGE 10	OF 11 FORM 24/48
NAME OF COMMITTEE (In F	ull)				FEC		
					C	C00000935	
Check if X 24-hour report	48-hour report	× New repo	rl [] Amends repo	ort filed o	on the second	· [ 0 . 0 ] /	
Full Name of Payee Screen Strategie	s Media, LLC				Date of Pub		/Dissemination
Malling Address 11150 F	Date of Dissemination: 11/0	4/16			11	04	2016
Suite 50					Amount		
City	S	late	Zip Code				40000.00
Fairfax	·	VA	22030			DID:SE-9541	
Purpose of Expenditure Media Buy			Calegory/ Type 004		10	' 27 '	2016
Name of Federal Candida	le	·	Support	Office	Sought:	House	District: 00
Trump, Donald, J., ,			X Oppose	×	President	Senate	State:
Calendar Year-To-Da Per Election for Offic		دده بود می منابعه ا ) 	6419383.70	Disbur 2016	sement For:	Priman specify) ►	/ 🗶 General
Full Name of Payee	•				Date of Put	olic Distribution	/Dissemination
AL Media LLC	Date of Dissemination: 11/0	4/16			11	04 °	2016
Mailing Address 222 W	Ontario St				Amount	i laindinad	Que alla adaptations
Suito		N-1-	7:- 0-4-			*********	2750.00
Cliy Chicago	2	Stale IL	Zip Code 60654			ID:SE-95498 bursement or	
Purpose of Expenditure Media Buy	-		Category/ 004 Type		11 11	04	2016
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with, or at the request or a	certily that the independent suggestion of, any candidate cal party committee or its age	or authorized	reported herein were committee or agent c	not mac of either,	de in cooper or (if the re	ation, consulta porting entity	ition, or concert is not a political
Ward, Kelly, C	· · · · · · · · · · · · · · · · · · ·	[Electroni	cally Filed/ Date	, [ <u>"</u> "	04	20	16
Signature							

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

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### Image# 201611049037121059 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

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	ME OF COMMITTEE (In Full)	, <u></u>			FEC		
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_	Full Name of Payee				Date of Put	Nic Distribution	v/Dissemination
	Screen Strategies Media, LL Date of Disser	.C mination: 11/04/16			61 F M	04	2016
j	Mailing Address 11150 Fairfex Blvd					استعمد	- to the second
Į	Suite 505				Amount		
	City	. State	Zip Code				13000.00
	Fairfax	VA	2203Q			ID : SE-9548	
	Purpose of Expenditure Media Buy		Category/ Type 004		11	03	2016
	Name of Federal Candidate	······································		Oífice	Sought	House	District: 00
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	Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbur 2016	sement For:	Primar	y 🗶 General
	Full Namo of Payee			<u></u>			n/Dissemination
	The New Media Firm, Inc.	mination: 11/04/16		ļ	11	04	2016
	Mailing Address 1730 Rhode Island Av				Farmenterne.	L.	hard-and-and
	Suite 213				Amount		
	City	Stale	Zip Code	1		• • • • • •	46000.00
	Washington	DC	20036			ID : SE-9548	
	Purpose of Expenditure Media Buy		Category/ 1 004 Type		11	03	2016
	Name of Foderal Candidate		Support	Oflice	Sought:	House	District: 00
	Trump, Donald, J., ,		🗶 Oppose	X	President	Senate	State:
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	Ward, Kelly, C., ,	/Electro	nically Filed] Date	e 11	04	20	16
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k il 24-nour report 48-nour report	New re	port Amends rep	ort liled on			
ull Name of Payee Screen Strategies Media, LLC Date of Dissemination; 11/07/16 - 24 hours prior to	election day	. Memo	llem Dale	of Publ	ic Distributio	n/Dissemination
lailing Address 11150 Fairfax Blvd	, ciccular, day			11	07	2016
- 11:50 - amax 500 Suite 505			Amo	urit		
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airfox	· VA	22030			ID : SE-954 ursement or	
urpose of Expenditure Media Buy		Category/ Type 00	a .	11	01	2019
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rump. Donald, J.		x Oppose	x Presi	Inec	Senale	State:
Calendar Year-To-Date Per Election for Office Sought		6643372.69	2016		Prma	ry × Genera
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Date of Dissemination: 11/01/16	<u> </u>			11 ,	DI	2018
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Nashinglon	DC	20036			ID:SE-954	
urpose of Expenditure Media Production	<u></u>	Category/ Type 004		11	01	2016
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Calendar Year-To-Date Per Election for Office Sought	, s	6693372.69	2016	•	; : Prima pecily) •	ry 🔽 Genera

(a) TOTAL Independent Expenditures . Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or cuncert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent. Ward Kelly, C. [Electronically Filed] 12 03 2018 Date Signature

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

24/48 HOUR REPORT OF INDEPENDE (Schedule E)	INT EXPEN	DITURES			PAGE 51	OF 52 F FORM 24/48
NAME OF COMMITTEE (In Full)	·	· · · · · · · · · · · · · · · · · · ·		FEG		
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Full Name of Payer		<u>.</u>	Dai	e of Publi	c Distribution	/Dissemination
Screen Strategies Media, LLC.	n: 10/18/16			<b>1</b> 0	- 5 ° 18	2016
Mailing Address 11150 Fairfax Blvd				10	10	2010
Suite 505			Am	ount		
City	Slate	Zio Code				134898,50
Fairfax	VA	22030	Tra	, nsaction	ID.: SE-9523	
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Media Buy		Category/ Type 004		້າ0	11	2016
Name of Federal Candidato		Support	Office Sou	ight: 1	House	District: 00
Donald J. Trump		X Oppose		ident		
Calendar Yoor To Date			Diebuream		Priman	K General
Per Election for Office Sought		2613000.20	2016	Other Ist	pecify) ►	7.5
Full Name of Payee.		·	· · ·			
Kully Hall, LLC			Ua			/Dissemination
Date of Dissemination	n: 10/18/16			ີ 10 <b>້</b>		2016
Mailing Address 1932 1st Ave. Suite 203			Am	0071		
City	State	Zip Code				6225.00
Seattle	WA	98101			D : SE-95237	
Purpose of Expenditure Media Buy Media Production		Category/ Typa	Ua		ursement or 2 2 2 2 18	2016
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Under penalty of perjury I certify that the indepen with, or at the request or suggestion of, any cand party committee) any political party committee or	idate or authoriz					
Kelly C. Ward			ri v		_	
		Date		19	20	6
Signature						

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

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24/48 HOUR REPORT OF INDEPEND	ENT EXPEND	ITURES			
(Schedule E)				PAGE 3	0F 3
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Mailing Address 650 Massachusells Avenuo, NV	N		Amou	in <b>t</b>	•
Suite 210			£		· • • • • • • • • • • • • • • • • • • •
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Washington	DC	20001		action ID : SE-9514 of Disbursement or	
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Full Name of Payee Screen Strategies Media, LLC				of Public Distribution	
Date of Dissominatio	n: 10/12/16		}	10 1 12	2016
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Purpose of Expenditure		Category/· )			2016
Media Buy		Туро	.J   L		2016
Name of Foderal Candidate		Support	Offico Sough	t: House	District:00
Trump, Donald, J., .		V Oppose	Freside	5	Slate:
			Disbursemen		
Calendar Year-To-Date		1534563.62	2016	L, /	
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(a) SUBTOTAL of Itemized Independent Expendent	turos		· • •	a	132132.00
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			٤٠٠	سم	
(c) TOTAL Independent Expenditures			· • · .	art ar a th	170032.00
	·····				
Under penalty of perjury I certify that the indepe	ndent expanditures	reported herein were	not made in c	coperation, consulta	ation, or concert
with, or at the request or suggestion of, any cana party committee) any political party committee or		s committee or agent o	i either, or (if t	the roporting entity	is not a political
	· - •				
Wurd, Kelly. C	<i>,</i> <b>-</b> .		<i>4. 14</i>	· · · · ·	
Signature	[Electron	ically Filed] Date	10	<sup>+ 13</sup> <sup>+</sup> ( <sup>20</sup>	16
			F	EC Schudule E (Form	24/28) Hev, 09/2013

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24/48 HOUR REPORT OF INDEPE	NDENT EXPEN	DITURES		PAGE 17 OF 17
(Schedule E)			·	PAGE 17 OF 17 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			15	
DCCC				C C00000935
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			4	1 110 FET 111 14 4-41
Check if 💢 24-hour report [] 48-hour rep	ort IXI New re	port ! Amends rep	ort filed on a	المربوري معاصمة من الجريمة جريرة المربور. المربوري معاصمة من المربورية المربور
Full Name of Payoo			Date of	Public Distribution/Dissemination
Screen Strategies Media, LLC				
Date of Dissemir Mailing Address 11150 Fairlax Blvd	1810n: 10/20/16	<u> </u>	<sup>1</sup>	0 20 2016
			Amount	
Suite 505			I I	· · · · · · · · · · · · · · · · · · ·
City	State	Zip Coda		107040.00 clion ID : SE-952389
Fairfax	VA	22030	Date of	ction ID : SE-952389 Disbursement or Obligation
Purpose of Exponditure		Category/	Vn -	"" · "o" at / j ~ ~ ~ ~ ~ ~ ~
Media Buy		Type 004	- I . 1	0 18 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	XI Presiden	
Calendar Year-To-Date Per Election for Office Sought	•	2939611.20	2016	For: Primary K General
	.1 1	•• • •	a state of the second sec	er (specifý) 🕨
Full Name of Payes				Public Distribution/Dissemination
AL Media LLC Date of Dissemil	nation: 10/20/16		:",	0 20 2016
Mailing Address 222 W Onterio St	<u></u>			
Suite 600			Amount	
City	Slate	Zip Code		140250.00
Chicago	N,	60654	Transact	tion ID : SE-952071
				Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004		
		1		
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		🔀 Oppose	Presiden	nt [] Senate State:
Calendar Year-To-Date			Disbursement	For: Primary Xi General
Per Election for Office Sought		2989611.20	1 2016	er (specify) >
_ <u></u>				
(a) SUBTOTAL of Itemized Independent Exp				247290.00
(a) SUBTUTAL OF Remized independent Exp	6//Q/UIES			r 1
				•
(b) SUBTOTAL of Uniternized Independent E			··· ►	•
				and the second second
(c) TOTAL Independent Expenditures			·· ►	652070.38
Under penalty of perjury I certify that the inc	tepondent expenditure	s raported herein were	not made in coo	operation, consultation, or concert
with, or at the request or suggestion of, any	candidate or authorize	d committee or agent of	of either, or (it the	e reporting entity is not a political
party committee) any political party committee	a or its agent.	•		
Kelly C. Wurd			់ក្រុងស្រុ	un a l'interne e tre
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Signature				
			FE	C Schedule E (Fonn 24/28) Rov. 09/2013

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SME OF COMMITTEE (In Full)       IFOR 520 FORM 2448         CCC       FC IDENTIFICATION NUMBER Y         C 20000035       FC IDENTIFICATION NUMBER Y         C 20000035       C 20000035         Full Xamo of Payee       Fristin Communications, Inc.       Date of Public Distribution/Dissemination         Mailing Address 1000 Pedmera Street, MW       Suite 420       Amount         City       State       Zip Code         Washington       DC 20007       Transaction to 758 53527         Profeed Cardidate       Support       Office Sought       House Officient Contigation         Mailing Address 1000 Pedmera Street, MW       State       Zip Code       Transaction to 758 53527         Mailing Address 1000 Pedmera Street, MW       State       Zip Code       Transaction to 758 53527         Marker of Faderation to 758 53527       Date of Disconstrant or Obligation       Transaction to 758 53527       Date of Disconstrant or Obligation         Name of Faderation to 7000 Storigt       State       Support       Office Sought       House Ofsinit: DO         Total State       Zip Code       Date of Discontination: 10/26/16       Discontination 10: SE 55/17; galoin       Amount         Total State       Zip Code       Support       Date of Discontination: 10/26/16       Date of Discontination: 10/26/16       Date	/48 HOUR REPORT OF INDEPEND chedule E)	ENT EXPEN	DITURES		PAGE 15 OF 15
CCCC       CC C00000033         neck II ≤ 24-hour report       Anends report         Full Name of Payse       Prism Communications, Inc.         Prism Communications, Inc.       Date of Dissemination: 1027/16         Malling Address 1000 Polomae Street, NW       Amends report         Suite 420       State         City       State         Payse       Prism Communication: 1027/16         Malling Address 1000 Polomae Street, NW       Amount         Suite 420       State         Consol of Federal Candidate       Date of Payse         Parpose of Expenditure       Category         Media Production       Category         Malling Address 1000 Folomae Street, NW       State         Suite 420       State         Category       Date of Federal Candidate         Conneld J. Trump       Support         Category       Office Sought         Full Name of Payse       President State         Category       Date of Dissemination: 10/26/16         Malling Address 1121 Sh St. NW       Date of Dissemination: 10/26/16         Malling Address 1121 Sh St. NW       State         Poor 41       State       20001         Transaction for Office Sought       Souport         Ofti					FOR SE OF FORM 24/48
C cc00000035         Preck II ≥ 24-hour report       New report       Amends report filed on         Full Name of Payse Prism Communications, Inc. Date of Disamination: 10/27/16       Date of Pusic: Distribution/Disamination: 10 27 2016         Mailing Address 1000 Polomac Street, NW Sulle 420       Amount         Twissection in 555: 55597       Date of Distribution/Disamination: 10 26 20007         Purpose of Expenditure Media Production       Catogory/ Type       Date of Distribution/Disamination: 10 26 2007         Name of Federal Candidate Donald J, Trump       Support       Office Sought       House Oldinit: 0 28 2016         Catendar Year-To-Date Production       Category/ 10 28 2016       Distribution/Distr					FEC IDENTIFICATION NUMBER
Hetk II (24-hour report					С соооорэз5
Prism Communications, Inc.       Date of Dissemination: 10/27/16         Mailing Address: 1000 Potomac Street, NW       State:         Sulfe 420       City         City       State:         Veshington       DC         Purpace of Expenditure       Category/ Type       Date of Dissement or Categaton         Name of Faderal Candidate       Support         Donald J, Trump       State:         Calendar Year-To-Date       President Goognament or Obligation         Per Election for Office Sought       State:         Total of Paderal Candidate       Support         Date of Dissemination: 10/28/15       Date of Dissemination: 10/28/15         Mailing Address:       112 Stah St. NW         Full Name of Federal Candidate       Support         Date of Dissemination: 10/28/15       Date of Dissemination: 10/28/15         Mailing Address:       112 Stah St. NW         Meals Production       Category/ Vice       Date of Dissemination: 10/28/15         Name of Federal Candidate       Support         Donald J, Trump       State:       Support         Vord's Corp.       Date of Dissemination: 10/28/15       Date of Dissemination: 10/28/15         Mailing Address:       123 Stah St. NW       Support       Date of Disbusement or Doligation </td <td>neck if 🔀 24-hour report 🗌 48-hour report</td> <td>X New n</td> <td>eport Amends rej</td> <td>aport filed on</td> <td></td>	neck if 🔀 24-hour report 🗌 48-hour report	X New n	eport Amends rej	aport filed on	
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Suite 420       Amount         City       State       Zip Code         Weshington       DC       20007         Purpose of Expenditure       Calendar Year-To-Date       Description         Calendar Year-To-Date       Support       Office Sought         Per Election for Office Sought       Support       Office Sought         Calendar Year-To-Date       Persident       Senato         Per Election for Office Sought       4550355.45       Disbursement For:       Primary © Caneral         76 WordS Corp.       Date of Dispursemination: 10/28/16       Date of Putic Distribution/Dissemination         76 WordS Corp.       Date of Dispursement for Obligation       10       26       2016         Washington       DC       20001       Transaction to Diffue Sought       550.00         Flat Name of Payee       To Corp.       Date of Dispursement or Obligation       10       26       2016         Washington       DC       20001       Transaction ID : SE-49471       500.00       10       26       2016         Name of Payee       To Code       20001       Transaction ID : SE-49471       500.00       10       27       2016         Name of Payee       City       State       Zip Code       500.00	Prism Communications, Inc.	on: 10/27/16		1	
City       Siste       Zip Code       2281.58         Washington       DC       20007       Transaction 10: 35: 35:3527         Purpose of Expenditure       Category       Out       10: 25: 2016         Wedie Production       Image: Support       Office Sought       10: 25: 2016         Dented J. Trump       Image: Opposite       House District:       00         Category       Optice Sought       4550355.45       Disbursement For:       Primary       Category         Category       Other Opposite       Date of District:       00       Other (specify) ▶         Full Name of Payee       121 Sin St. NW       Date of Dissemination:       10: 25: 2016       Amount         City       State       Zip Code       20001       Date of Public Distribution/Dissemination         City       State       Zip Code       20001       Date of Public Distribution/Dissemination         City       State       Zip Code       20001       Transaction ID: SE-95471       2016         Name of Federal Canditate       DC       20001       Date of Dissurement or Obligation       2015         Oprove of Expenditure       Souport       Otice Sought       House       Souport       2016         Obreat J. Trump       Souport				Amoun	 It
Washington       DC       20007       Transaction ID: SE-353227         Purpose of Expenditure Media Production       Category/ Type       004       Transaction ID: SE-353227         Name of Faderal Candidate       Support       Office Sought:       Heure Obstrict:       00         Donald J. Trump       Xi Oppose       Keisen       Senate       5enate       00         Calendar Year-To-Date Per Election for Office Sought       4550355.45       Disbursement For:       Primary Xi General 2016       Other specify) >         Full Name of Payse 76 Words Corp. Date of Dissemination:       10/26/15       Date of Distribution/Dissemination 10/2/26       2016         Mailing Address       1121 Sin Si, NW       State       Zip Code       Transaction ID: SE-854771         City       State       Zip Code       Transaction ID: SE-854771       State       00         Name of Federal Candidate       Calendar Year-To-Date       Support       Otice Sought:       Heuse       Distor of Disbusement or Obligation         Nurse of Expenditure       Support       Otice Sought:       Heuse       Disbusement or:       Disbusement or:       Disbusement or:       Disbusement or:       Disbusement or:       Primary       General         Oppose       Xing       Support       Otice Sought:       Heuse <td< td=""><td></td><td><u> </u></td><td>Zia Cada</td><td><b></b>.</td><td>2001 68</td></td<>		<u> </u>	Zia Cada	<b></b> .	2001 68
Purpose of Expenditure Media Production       Category/ Type       004       10       22       2016         Name of Federal Candidate       Suppont       Office Sought       Howe District:       00         Donald J. Trump       Senato       State:       Disbursement For:       Primary & General Disbursement For:       Primary & General Disbursement For:       Other (specify) >         Full Name of Payse 76 Word's Corp.       Date of Dissemination:       10/26/18       Date of Public Distribution/Dissemination:         76 Word's Corp.       Date of Dissemination:       10/26/18       Transaction ID:       SE-054171         Mailing Address       1121 Sin St. NW       Floor #1       State       Z016         City       State       Z0001       Transaction ID:       SE-054171         Purpose of Expenditure Media Production       Category/ Type       004       "10"       27"       2016         Name of Federal Candidate       Support       Office Sought       "436718.92       Discursement For:       Primary & General         Catendar Vean-To-Date Per Election for Office Sought       *       4436718.92       Discursement For:       Primary & General         (a) SUBTOTAL of Unitemized Independent Expenditures       *       *       771728.77       77         (b) SUBTOTAL of Unitemized In	-				iction ID : SE-953927
Donald J. Trump       Image: Coppose       Image: Coppose       Image: Coppose         Catendar Year-To-Date Per Election for Office Sought       4550355.45       Disbursement For: Image: Compose       Primary (Catendar Year-To-Date Per Election for Office Sought         Full Name of Payse 76 Words Corp.       Date of Dissemination: 10/26/16       Date of Public Distribution/Dissemination 10 26 2016         Mailing Address 1121 Sin St. NW       Date of Dissemination: 10/26/16       Image: Coppose         Washington       DC       20001       Transaction ID: SE-954171         Purpose of Expenditure Meula Production       Category/ Type       004       "10" 27" 2016         Name of Federal Candifate Donald J. Trump       Support       Office Sought       4436718.52         Catendar Vear-To-Date Per Election for Office Sought       4436718.52       Disbursement For: Imprimary (Catendar Vear-To-Date Per Election for Office Sought         (a) SUBTOTAL of Unitemized Independent Expenditures       Af35718.52       Disbursement For: Imprimary (Catendar Vear-To-Date Per Flection for Office Sought       771178.77         (b) SUBTOTAL of Unitemized Independent Expenditures       F771178.77       771178.77         Under penalty of perjury 1 certify that the independent expenditures reported herein were not made in cooperation, consultation, or concent with, or at the request or suggestion of, any candidate or authorbaid committee or agent of eliher, or (If the reporting entity is not a politicel party commit				- 6	
Denaid J. Trump       X: Opposi       X: President       Senato       State:	Name of Federal Candidate			Office Sought	House District: 00
Per Election for Office Sought       4550335.45       2016       Other (specify) ▶         Full Name of Peyse 76 Words Corp.       Date of Dissemination: 10/26/16       Date of Public Distribution/Dissemination 10       26       2016         Mailing Address 1121 Sth St. NW Floor #1       Date of Dissemination: 10/26/16       Date of Public Distribution/Dissemination 10       26       2016         City Washington       Dic       20001       Transaction ID : SE-454171       Amount         Purpose of Expenditure Media Production       Dic Z0001       Transaction ID : SE-454171       5500.00         Name of Federal Canditate       Support       Otice Sought       10       27       2016         Donald J. Trump       Support       Otice Sought       House District:	Donaid J. Trump			-	
76 Words Corp.       Date of Dissemination: 10/26/16       10       26       2016         Mailing Address       1121 Sin St. NW       Ito 26       2016       Amount         City       State       Zip Code       Transaction ID : SE-954171       Date of Dispersion of Obligation         Purpose of Expenditure       DC       20001       Transaction ID : SE-954171       Date of Disbursement or Obligation         Name of Federal Gandidate       DC       20001       Transaction ID : SE-954171       Date of Disbursement or Obligation         Name of Federal Gandidate       Support       Otice Sought:       House       District:       D00         Donald J. Trump       Image: Calendar Year To-Date       Support       Otice Sought:       House       District:       D0         Calendar Year To-Date       Per Election for Office Sought       4436718.92       Disbursement For:       Primary       I General         (a) SUBTOTAL of Itemized Independent Expenditures       Address       Provide in cooperation, consultation, or concent         (b) SUBTOTAL of Unitemized Independent expenditures       Ported therein were not made in cooperation, consultation, or concent       Primary 2016       Primary 2016         Under pensity of perjury 1 certify that the independent expenditures reported herein were not made in cooperation, consultation, or concent       Pri to 27		<b>,</b>		2016	
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Floor #1       Amount         City       State       Zip Code         Washington       DC       2001       Transaction iD : SE-954171         Purpose of Expenditure       Category/ Meula Production       Category/ Type       004       "10"       27       2016         Name of Federal Candidate       Support       Otice Sought       House District:       00         Donald J. Trump       Senate       Senate       Senate       Senate         Catendar Year To-Date Per Election for Office Sought       4436718.92       Disbursement For:       Primary       Sceneral Coher (epocity) >         (a)       SUBTOTAL of Itemized Independent Expenditures       8791.58       771178.77       7         (b)       SUBTOTAL of Unitemized Independent Expenditures       Frontidate or authorized committee or agend of either, or (if the reporting entity is not a political party committee or its agent.       771178.77         Under penalty of perjury 1 certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion ot, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee or its agent.		n: 10/20/16			10 26 2016
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Washington       DC       2001       Transaction iD : SE-954171         Purpose of Expenditure Meula Production       Category/ Type       004       "10" 27 2016         Name of Federal Candidate       Support       Office Sought:       House       Disturce         Donald J. Trump       Oppose       Prosident       Senate       State:         Category/ Type       Out       "10" 27" 2016       Senate       State:         Catendar Year-To-Date Per Election for Office Sought       4436718.92       Disbursement For:       Primary       General 2016       Other (specify) >         (a) SUBTOTAL of Itemized Independent Expenditures       8791.58       771178.77       7         (b) SUBTOTAL of Unitemized Independent Expenditures       771178.77       7       771178.77         Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concart with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.         Kethy C. Ward       10       27       2016	Floor #1				
Date of Disbursement or Obligation         Purpose of Expenditure Meula Production       Category/ Type       Out       Date of Disbursement or Obligation         Name of Federal Candidate       Support       Odd       To       27       2016         Name of Federal Candidate       Support       Odice Sought:       House       Disbursement for:       Oppose         Catendar Year To-Date Per Election for Office Sought       4436718.92       Disbursement For:       Primary       General Science         (a) SUBTOTAL of Itemized Independent Expenditures       A       4436718.92       Disbursement for:       Primary       Science         (b) SUBTOTAL of Unitemized Independent Expenditures       A       A       A       A       A       A         Under penalty of perjury I certify that the independent expenditures or authorized committee or agent of either, or (if the reporting entity is not a political party committee or its agent.       A       A       A       A       A         Late       10       27       2016       A       A       A       A       A       A       A         Date       10       27       2016       A       A       A       A       A       A       A       A       A       A       A       A       A       A	City	State	Zip Code		سامله و (
Meula Production       Callegry 004       10       27       2016         Name of Federal Candidate       Support       Office Sought:       House       District:       00         Donald J. Trump       Oppose       Oppose       President       Senate       State:       00         Calendar Year To-Date       Per Election for Office Sought       4436718.92       Disbursement For:       Primary       General         Calendar Year To-Date       Per Election for Office Sought       4436718.92       Disbursement For:       Primary       General         (a) SUBTOTAL of Itemized Independent Expenditures       # 4436718.92       Disbursement For:       Primary       8791.58         (b) SUBTOTAL of Unitemized Independent Expenditures       # 771178.77       # 771178.77       # 771178.77         (c) TOTAL Indopandent Expenditures       Propriet herein were not made in cooperation, consultation, or concert with, or at the request or auggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee or its agent.         Kelly C. If and       Total arty committee or its agent.		DC	20001		
Donald J. Trump       Image: Support of the sought       President is sought       President is sought         Calendar Year To-Date Per Elaction for Office Sought       4436718.92       Disbursement For: image: Primary is general 2016 image: Office (spacify) >					
Calendar Year To-Date Per Election for Office Sought       4436718.92       Disbursement For:       Primary       Ceneral         (a) SUBTOTAL of Itemized Independent Expenditures       4436718.92       Disbursement For:       Primary       Senare         (b) SUBTOTAL of Unitemized Independent Expenditures       8791.58         (c) TOTAL Independent Expenditures       771178.77         Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concent with, or at the request or auggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.         Kelly C. Werd       10       27       2016	Name of Federal Gandidate		Support	Office Sought	:   House District: 00
Per Election for Office Sought  4436718.92  2016 Other (specify) >  (a) SUBTOTAL of Itemized Independent Expenditures (b) SUBTOTAL of Unitemized Independent Expenditures (c) TOTAL independent (c) TOTAL	Donald J. Trump	· .		X Prosider	nt Senate State:
(a) SUBTOTAL of Itemized Independent Expenditures         (b) SUBTOTAL of Unitemized Independent Expenditures         (c) TOTAL Independent Expenditures         (c) TOTAL Independent Expenditures         771178.77         (c) TOTAL independent expenditures         request or auggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.         Kally C. Ward       Unit / 5 P         Date       10       27         2016	Calendar Year-To-Date	· · ·	•		For: Primary X Gener
(a) SUBTOTAL of Itemized Independent Expenditures	Per Election for Office Sought	y' 7•			her (specify) >
(c) TOTAL Independent Expenditures	(a) SUBTOTAL of Itemized Independent Expend	itures		···· ► .	8791.58
(c) TOTAL Independent Excenditures	(b) SUBTOTAL of UniterNzed Independent Expe	enditures			· · · · · · · · · · · · · · · · · · ·
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.           Kelly C. Ward         4 tit / 5 p         7 Y           Total         10         27         2016	· · · · · · · · · · · · · · · · · · ·			-	e de la constante de la compañía
with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.          Kelly C. Ward       Note of the reporting entity is not a political party committee or its agent.	(c) TOTAL independent Excenditures			•••• •	771178.77
Date 10 27 2016	with, or at the request or suggestion of, any can	didate or authoriz			
	Kelly C. Word		Da	ын <i>)</i> te 10	5 F 'r Y V' 27 2016
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24/48 HOUR REPORT OF INDEPENDENT EXPEND	ITURES	PAGE 22 OF 25
		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER V
DCCC		C. C00000935
Check If [_] 24-hour report 🕅 48-hour report 🕅 New re	port [_] Amends repo	art lied on
Full Name of Payse		Date of Public Distribution/Dissemination
Kully Hall, LLC		10 12 2016
Date of Dissemination: 10/12/16		10 <b>12 ( 2016</b>
Mailing Address 1932 1st Ave. Sulta 203		Amount
City State	Zip Code	4297.00
Scattle WA	98101	Transaction ID : SE-951665
		Date of Disbursement or Obligation
Purpose of Experiditure Media Buy Media Producilon	Category/ Typo	10 14 2016
Name of Federal Candidulo	Support	Office Sought: House District: 00_
Donalo J. Trump		
······································	NA Obbose	
Calendar Year-To-Date	721688.30	Disbursement For: Primary X General
Per Election for Office Sought	121000.30 4	2016 Other (specily) ▶
Full Name of Payee		Date of Public Distribution/Dissemination
The New Media Firm, Inc. Date of Dissemination: 10/12/16		10 12 2018
Mailles Adda	······································	10 <u>12</u> <u>12</u> <u>2016</u>
Maising Address 1730 Rhode Island Avo., NW		, Amount
Suite 213		
City State	Zip Code	, 56930.43
Washington DC	20036	Transaction ID : SE-951666 Date of Disbursement or Obligation
Purpose of Exponditure	Category/ cont	
Media Buy	Type GO4	10 12 2016 4
Name of Federal Candidate	<u> </u>	
	Support	Office Sought: House District: 00
Donald J. Trump	🔀 Oppose	President Senato State:
Calendar Year-To-Date	÷.,	Disbursement For: Disbursement For:
Per Election for Office Sought	1721688.30	2016 Other (specify) ▶
(a) SUBTOTAL of licenized independent Expanditures	<b>***********************************</b> ****	► 61227.43
(b) SUBTOTAL of Uniternized Independent Expenditures		• •
(c) TOTAL Independent Expenditures		
Under penalty of parjury I certify that the independent expenditures with, or at the request or suggestion of, any candidate or authorize party committee) any political party committee or its agent.		
Kelly C. Ward	Date	10 14 2016
Signature		

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

(Schedule E)	PENDENI EAPEND			PAGE 21 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC				
				C   C00000935
Check if 24-hour report 🗶 48-hou	r report 🗶 New rep	port Amends repo	rt filed on	
Full Name of Payee		· .		Public Distribution/Dissemination
The New Media Firm, Inc. Date of Dis	semination: 10/12/16		17	10 12 1 2016
Mailing Address 1730 Rhode Island Av	76., NW		' Amouni	
Suite 213				هم دهوني الارد به مدم معرد الا الد.
City	State DC	Zip Code 20036	Trains	4047.25 ction ID : SE-951654
Washington		20030		Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/		10 12 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 Per Election for Office Sought	·····	1721688.30	Disbursement 2016 Oth	For: Primary ¥ General ner (specify) ▶
Full Name of Payee	_		Date of	Public Distribution/Dissemination
Screen Strategies Media, LL Date of Dis	.C semination: 10/12/16		<u>_</u>	10 12 2016
Mailing Address 11150 Fairfax Blvd				Tangar F. San and Dray and Franks and S
Suite 505			Amoun	
City Fairfax	State VA	Zip Code 22030		121850.00 tion ID : SE-951660
Purpose of Expenditure	<u></u>		.	
Media Buy		Category/ Type 004		0 12 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 Per Election for Office Sought		1721688.30	Disbursement 2016	For: Primary X General ner (specify) ▶
(a) SUBTOTAL of Itemized Independen	t Expenditures		•	125897.25
	• • • <b>•</b> • ••			المحاد مارسو محد مار مربع المع
(b) SUBTOTAL of Uniternized Independ	lent Expenditures		·▶ : 	te d'antien ben ? <u>antient</u> estimate al
(c) TOTAL Independent Expenditures				
(-)				أبهرا الثائد بالاستثناء متصالاها فالعا
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 authorized			
Ward, Kelly, C., .	161	Saulla Filadi	N "M / "	ГО 0° Г V° Y Y Y
Signalure	[Electroi	ically Filed) Date	10	14 2016

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

24/48 HOUR REPORT OF INDEPENDENT	EXPEND	ITURES			DAGE 24	OF 25
(Schedule E)					FOR SE OF	OF 25 FORM 24/48
NAME OF COMMITTEE (In Full)				FEC I		
DCCC				;==	C00000935	· ···· ····
Check if 24-hour report 🗶 48-hour report	New repr	ort 🗶 Amends repo	ort filed on	10	/ • n 🕶 ) / 14 • 4 - i	2016
Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/	42/16		Dat		1 6 . 0 . 1	/Dissemination
Mailing Address 1730 Rhode Island Ave., NW		<del></del>		10	12 12	2016
Suite 213			Am	ount		
	State	Zip Code	ı <sup></sup>			4047.25
Washington	DC	20036	<b>Ťra</b> Dat	nsaction te of Disbu	ID : SE-95237 ursement or (	72 ······
Purpose of Expenditure Media Buy Media Production		Category/ f		10	14	2016
Name of Federal Candidate		Support	Office Sou	icht:	House	District: 00
Trump, Donald, J., ,		X Oppose	Pres		Senate	State:
Calendar Year-To-Date Per Election for Office Sought		1856586.80	Disbursem		Primary	
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/	/12/16					/Dissemination
Mailing Address 11150 Fairfax Blvd Suite 505			Am	iount	يرسم در د	
City	State	Zip Code		• •	- SE 05217	121850.00
Fairfax	VA	22030			D: SE-95237	J
Purpose of Expenditure Media Buy		Category/ 004 Type 004				
Name of Federal Candidate		Support	Office Sou	ight:	House	District: 00
Trump, Donald, J., .		X Oppose	X Pres		Senate	State:
Calendar Year-To-Date Per Election for Office Sought		1856586.80	Disbursem 2016	<u>I</u>	Primary	
(a) SUBTOTAL of Itemized Independent Expenditures.	.,		·· • · · · · · · · · · · · · · · · · ·	مېر همېرېد . دا مېرې د		125897.25
(b) SUBTOTAL of Unitemized Independent Expenditur	ïes		•	ه رسمدر ۲۰۰۰ مالیسینید (	د در دهر معومه د ادبو اید اوم	المنافق للرمين المارية. 1 الأمريكي 1 - كم الأم
(c) TOTAL independent Expenditures			· • ·	5 . 4. 6 . 4.	د پېرېد سر ۲۰ بېد کې	- المستود (مستور) - المستود (مد
Under penalty of perjury I certify that the independent with, or at the request or suggestion of, any candidate party committee) any political party committee or its ac	e or authorized					
Ward, Kelly, C., ,	[Electron	ically Filed) Date	¥г.ч 10	/ 'o" "o 18	: / · • • • • • • • • • • • • • • • • • •	· · · ·
Signature						

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24/48 HOUR REPORT OF INDEPEND	DENT EXPEND	DITURES		PAGE 3 OF 3
(Schedule E)		•		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)				
DCCC				C C00000935
Check II 🛄 24-hour report 🛛 🔀 48-hour report	New re	port [] Amends rep	ort filed on $\frac{i}{1}$	**************************************
Full Name of Payee			Date o	of Public Distribution/Dissemination
Buying Time, LLC	op: 10/11/18		, u	10 11 2016
Mailing Address 650 Massachusetts Avenue, N				10 1 11 2016
Suite 210			Amour	nt
City	State	Zip Code		57500.00
Washington	DC	20001	Date o	action ID : SE-951439 If Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004		10 11 2016
Name of Federal Candidato		Support	Office Sought	: House District: 00
Donald J. Trump		Oppose	X Preside	nt Senato State:
Calendar Year-To-Date Per Election for Office Sought	1	459931.62	Disbursement	For: Primary K General
Cull Name of Datas				
Full Name of Payee Screen Strategies Media, LLC Duto of Disseminati	ion: 10/12/16			12 2016
Mailing Address 11150 Fairfax Blvd				inter a series and be demandered
Suite 505			Amoui	-
Cliy	State	Zip Code		74632.00
Fairfax	VA	22030		ction ID : SE-951438
Purpose of Expenditure		Category/		145 / 10 TO / 247 V EV WY 1
Media Buy		Type 004		10 11 2016
Name of Federal Candidate		Support	Office Sought	: House District: 00_
Donald J. Trump			N Preside	
			Disbursement	
Calendar Year To-Date	• •	1534563.62	2016	lass and
	1 2 9	·7 · a	0	her (specily) 🕨
	dia			132132.00
(a) SUBTOTAL of Ilemized Independent Expendent	Ditufes		• •	132132.00
(b) SUBTOTAL of Uniternized Independent Exp	entitures		•	· · · · ·
			• • • · · •	nanda a sa san basar sa
(c) TOTAL Independent Expenditures			•	170032.00
Under panalty of perjury I certify that the Indep			not made in cr	operation consultation or concert
with, or at the request or suggestion of, any car party committee) any political party committee of	ididate or authorized	d committoe or agent o	f either, or (if li	ne reporting critity is not a political
Kally C. Ward			м'ц /	b-0,/ Y Y Y Y,
		Date	, 10	13 2016
Signature				
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24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
(Schedule E)	PAGE 50 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	
DCCC	C00000935
	16463 / 297479777
Check if X 24-hour report 48-hour report New report Amends report filed on	
Screen Strategies Media, LLC	25 2016
Date of Dissemination: 10/25/16 10 Mailing Address 11150 Fairfax Blvd	25 2016
Sulle 505	
City State Zlo Code	121850.00
Fairfax VA 22030 Transaction II	D : SE-952388 Insement or Obligation
Name of Federal Candidate	House District:00
Donald J. Trump	Senate State:
	Primary X General
Per Election for Office Sought , 4369947.93 2016 Othor (spi	
Buying Time, LLC	25 2016
Date of Dissemination: 10/25/16         j         10           Mailing Address         650 Messachusetts Avenue, NW         j         10	25 2016
Amount	
City State Zip Code	19691.00
Washington DC 20001 Transaction ID Date of Disbu	SE-953229 Irsement or Obligation
Purpose of Expenditure Media Buy Catagory/ 004 10 10	24 Y 2016
Name of Federal Candidate Support Office Sought:	House District: 00
Donald J. Trump X Oppose X President	Senate State:
Celendar Year To-Dato Disbursement For: 2016 2016 2016	Primary 🔀 General
Per Election for Office Sought , , , , , , , , , , , , , , , , , , ,	ecify) 🕨
(a) SUBTOTAL of Ilemized Independent Expenditures	14 154 1.00
(b) SUBTOTAL of Uniternized Independent Expenditures	
	and a second
(c) TOTAL Independent Expenditures	n at attantion at a f
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperati with, or at the request or suggestion of, any candidate or authorized committee or agent of oither, or (if the repo party committee) any political party committee or its agent.	
Kelly C. Hard	1. 7
Signature Date 10 25	2016

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

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 57 OF 57
NAME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48
Check If 🔀 24-hour report [] 48-hour report [] Amends report	
Full Name of Payee Buying Time, LLC Date of Dissemination: 11/01/16	Date of Public Distribution/Dissemination
Mailing Address 850 Massachusetts Avenue, NW	
Sulto 210	
City State Zip Code	17175.00
Washington DC 20001	Transaction ID : SE-954373 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Type	10 28 2016
Name of Federal Candidate Support C	Office Sought: House District: 00
Donald J. Trump Qppose	President Senate State:
	Disbursement For:] Primary _ [X] General 016 Other (specify) ►
Full Name of Payee Screen Strategies Media, LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 11/01/16	
Mailing Address 11150 Foirfox Blvd Sulto 505	Amount
City State Zip Code	74850.00
Fairfax VA 22030	Transaction ID : SE-954175 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ : 004 Type :	
Name of Federal Candidate	Office Sought: House District: 00
	President []] Senate State:
	Disbursement For: Primary 🕅 Goneral 2018 □ Other (specify) ►
(a) SUBTOTAL of Itemized Independent Expenditures	ا المىيەلىيەت ئىيىغان ئىيىغان بار 10 - ئەر 10 - ئار 10 - ئەر 10 - ئار يەر 10 - ئار يەر 10 - ئار يەر 10 - ئار ي يەمىرىيىتچىمىرىيەترە مەرە مەرە مەرە - يەر 10 - يار يەرەبىي
(c) TOTAL Independent Expenditures	14333615.05
Under penalty of perjury I certify that the independent expenditures reported herein were no with, or at the request or suggestion of, any candidate or authorized committee or agent of e party committee) any political party committee or its agent.	
Kelly C. Ward Signature	11 02 2016

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

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

Schedule E)	PAGE 11 OF 12 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	
	C C0000935
Check if X 24-hour report 48-hour report X New report Amends report filed	on שדשע י דמדמע י דידידיקע
	finderal featured have been been been been been been been be
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/05/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd	Amount
Suite 505	
City State Zip Code Fairfax VA 22030	58700.00 Transaction ID : SE-954453
Purpose of Expenditure Media Buy Category/ 004 Type 004	Date of Disbursement or Obligation
Name of Federal Candidate Support Office	Sought: House District: 00
Trump, Donald, J., . X Oppose X	President State:
Calendar Year-To-Date Disbu Per Election for Office Sought 6526208.19	ursement For: Primary X General
Full Name of Payeo Canal Partners Media, LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 11/06/16 Mailing Address 25 Whitlock Place	11 06 2016
Suite 200	Amount
City State Zip Code	7910.00
Marietta GA 30064	Transaction ID : SE-954884 Date of Disbursoment or Obligation
Purpose of Expenditure Category/ 004 Media Buy 004	11 03 2016
Namo of Fedoral 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:
	······
(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 r, or (if the reporting entity is not a political
Ward, Kelly, C [Electronically Filed] Date	1 06 2016
Signature	hand Amsterial Anatomisturetured

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## Image# 201610189033039653 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

(Schedule E)	IDENI EXPEND	UNES		PAGE 19 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			0	EC IDENTIFICATION NUMBER V C C00000935
Check if 24-hour report 🗶 48-hour repo	ort	port 🗶 Amends repo	rt filed on	N , <b>5 + 0</b> , <b>2016</b>
Full Name of Payee Ralston Lapp Media, LLC Date of Dissemin	ation: 10/14/16		Date of	Public Distribution/Dissemination
Mailing Address 1054 31st Street, NW Suite 430			Amount	0 14 2016
City Washington	State DC	Zip Code 20007	Transac	12260.71 tilon ID : SE-951677
Purpose of Expenditure Media Production		Category/ Type 004		Disbursement or Obligation
Name of Federal Candidate Hurd, William, , ,		Support	Office Sought:	X     House     District:     23       I     []     Senate     State:     TX
Calendar Year-To-Date Per Election for Office Sought	موسید با میں	1648833.65	Disbursement	For: Primary X General er (specify) >
Full Name of Payee Buying Time, LLC Date of Dissemin Mailing Address 650 Massachusetts Aven			Date of	Public Distribution/Dissemination 0 14 2016
Sulle 210 City Washington	State DC	Zip Code 20001	Transac	53000.00 tion ID : SE-952374 Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004		0 13 2016
Name of Federal Candidate Trump, Donald, J., .		Support	Office Sought:	House District: 00
Calendar Year-To-Date Per Election for Office Sought		1919459.68	Disbursement 2016	For:
(a) SUBTOTAL of Itemized Independent Exp	enditures		•	65260.71
(b) SUBTOTAL of Uniternized Independent E	xpenditures		•	
(c) TOTAL Independent Expenditures				
Under penally of perjury I certify that the inc with, or at the request or suggestion of, any party committee) any political party committee	candidate or authorize			
Ward, Kelly, C., , Signature	Electro	nically Filed) Date	10 (	18 2016
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#### Image# 201610199033071490 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

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(Schedule E)			• PAGE 52 OF 52 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC		·····	FEC IDENTIFICATION NUMBER ▼ C C00000935
Check if [ 24-hour report 🗶 4	8-hour report X New	v report 🔲 Amends repo	
Full Name of Payee The New Media Firm, Date	Inc. of Dissemination: 10/18/16		Date of Public Distribution/Dissemination
Mailing Addross 1730 Rhode Isla	nd Ave., NW		Amount
Suite 213			<u>}</u>
City Washington	State DC	Zip Code 20036	3407.87 Transaction ID : SE-952382 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type	
Name of Federal Candidate		Support	Office Sought: House District: 00
Trump, Donald, J., ,	<u></u>	X Oppose	Y President Senate State:
Calendar Year-To-Date Per Election for Offico Soug	hi <b>Carteria de la</b>	2613000.20	Disbursement For: Primary X General 2018 Other (specify) ▶
Full Name of Payee Buying Time, LLC Date	of Dissemination: 10/18/16		Date of Public Distribution/Dissemination
Mailine Address	usells Avenue, NW	<u> </u>	
Suite 210	•		Amount
City	State	Zip Code	83829.00
Washington	DC	20001	Transaction ID : SE-952073 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004 Type	10 <sup>11</sup> 17 <sup>11</sup> 2016
Name of Federal Candidate		Support	Office Sought: House District: 00
Trump, Donald, J., ,		X Oppose	X President State:
Calendar Year-To-Date Per Election for Office Soug	ht	2613000.20	Disbursement For: Primary X General 2016 Olhor (specify) ►
(a) SUBTOTAL of Itemized Indep	endent Expenditures		87236.87
(b) SUBTOTAL of Uniternized Ind	epondent Expenditures		
(c) TOTAL Independent Expendit	Ire\$		11152409.38
	on of, any candidate or autho		not made in cooperation, consultation, or concert I either, or (if the roporting entity is not a political
Ward. Kelly, C., .	[Ele	cctronically Filed/ Date	10 19 2016
Signature			

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ME OF COMMITTEE (In Full)						OF FORM 24/48
				FEC	IDENTIFICAT	
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eck it 🕅 24-hour report 🛛 48-hour repor	t 🔀 New rej	port [_] Amends rep	ort filed	on 7	· · · · · · ·	I Part and the second
Full Name of Payee Screen Strategies Media, LLC	· · · · · · · · · · · · · · · · · · ·					n/Dissemination
Date of Dissomina	tion: 10/25/16			. 10	25	, 2 <del>7 7 7 7 7</del> 7 7 7 7 7 7 7 7 7 7 7 7 7 7
Mailing Address 11150 Fairfax Blvd Suite 505				Amount	يتيني منيمة ال	Branc Ingenaut a Bring
				· ·		
Cily Fairfax	State VA	Zip Code 22030		Transaction	n ID : SE-953 bursemont or	64326.00 184
Purpose of Expenditure Modia Buy		Catogory/ 004				2016
Name of Federal Candidate		[ ] Support		Sought:	House	District: 00
Donald J. Trump	<u>i</u>	X Oppose		President	[] riouse [] Senate	State:
Calendar Year-To-Dale - Per Election for Office Sought	۔ 4 ون م	369947.93		sement For:	[_] Primar specilý) ►	ry 🕅 General
Full Name of Payeo		البالي الماكات بعدائك بمعنان ويرجب	T			n/Dissemination
Buying Time, LLC				<b>1</b> 4 - 14 <sup>1</sup>		/ {`V <sup>**</sup> ! \``, Y T'Y
Date of Disseminal	tion: 10/25/16			10	. 25	2016
Mailing Address 650 Massachusetts Avenue	), NW			Amount		
Suite 210					·•• · · · •	. بو معر و و .
City	State	Zip Code				62488.00
Washington	DC	20001	1		ID : SE 95318 bursament or	
Purpose of Expenditure Media Buy		Category/ ! 004		ີນ 10		
		Iype		I	التسعيدة	
Name of Federal Candidate		Support	Office	Sought:	House	District: 00
Donald J. Trump		X Oppose	X	President	Senate	Slate:
Calendar Year-Tc-Date		· · · ·	Disbur	sement For:	Primar	y 🕅 General
Per Election for Office Sought		4369947.93	2016	Other (	specify) 🕨	· · · · · ·
					<u>,</u> • . •,	
a) SUBTOTAL of Itemized Independent Expen	ditures	•••••	·· 🕨		••. •	126814.00
					ويعر مرعي م	سيدر بارتجاره
b) SUBTOTAL of Unliemized Independent Exp	ionditures		·· 🕨 -		<b></b>	مىكە بەلوم يەم بە
					• . •• .	المريد والمريد
c) TOTAL Independent Expenditures			" <b>•</b> ,		<b>.</b>	in energy
Under penalty of porjury I certify that the indep with, or at the request or suggestion of, any ca party committee) any political party committee o	ndidate or authorized	; reported herein were d committee or agent o	nol mad of either,	le in cooper or (if the rej	allon, consulte porting entity	allon, or concert is not a political
with, or at the request or suggestion of, any ca	ndidate or authorized	g comnilitee or agent o	of either,	le in coopera or (if the rej	porting entity	ation, or concert is not a political
vith, or at the request or suggestion of, any ca party committee) any pullitati party committee a	ndidate or authorized	; reported herein were d committee or agent o Date	of either,	or (if the rej	porting entity	ation, or concert is not a political . Y <sup>-ye</sup> vit 16

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