

**BEFORE THE FEDERAL ELECTION COMMISSION**

COMMITTEE TO DEFEND )  
THE PRESIDENT )  
203 S. Union Street, Suite 300 )  
Alexandria, VA 22314, )

*Complainant,* )

v. )

HILLARY VICTORY FUND )  
FEC ID Number C00586537 )  
P.O. Box 5256 )  
New York, NY 10185-5256 )  
Elizabeth Jones, Treasurer, )

ELIZABETH JONES, in her official capacity )  
as Treasurer of Hillary Victory Fund )  
P.O. Box 5256 )  
New York, NY 10185-5256 )

HILLARY FOR AMERICA )  
FEC ID Number C00575795 )  
P.O. Box 5256 )  
New York, NY 10185-5256 )  
Jose H. Villareal, Treasurer, )

HILLARY RODHAM CLINTON )  
in her official capacity as a Candidate for )  
President of the United States )  
FEC ID Number P00003392 )  
P.O. Box 5256 )  
New York, NY 10185-5256 )

DNC SERVICES CORPORATION / )  
DEMOCRATIC NATIONAL COMMITTEE )  
FEC ID Number C00010603 )  
430 South Capitol Street SE )  
Washington, D.C., 20003 )  
William Q. Derrough, Treasurer, )

WILLIAM Q. DERROUGH, in his official )  
capacity as Treasurer of DNC Services )  
Corporation / Democratic National Committee )  
399 Park Ave., 5th Floor )  
New York, NY 10022 )

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ALASKA DEMOCRATIC PARTY )  
FEC ID: C00191247 )  
2602 Fairbanks St. )  
Anchorage, AK 99503 )  
Carolyn Covington, Treasurer, )

DEMOCRATIC PARTY OF ARKANSAS )  
FEC ID number C00024372 )  
1300 West Capitol Ave )  
Little Rock, AR 72201 )  
Dawne Vandiver, Treasurer, )

COLORADO DEMOCRATIC PARTY )  
FEC ID number C00161786 )  
789 Sherman Street, Suite 110 )  
Denver, CO 80203 )  
Rita Simas, Treasurer, )

DEMOCRATIC STATE COMMITTEE )  
(DELAWARE) )  
FEC ID number C00211763 )  
P.O. Box 2065 )  
Wilmington, DE 19899 )  
Helene Keeley, Treasurer, )

DEMOCRATIC EXECUTIVE COMMITTEE )  
OF FLORIDA )  
FEC ID number C00005561 )  
214 South Bronough Street )  
Tallahassee, FL 32301 )  
Francesca Menes, Treasurer, )

GEORGIA FEDERAL ELECTIONS )  
COMMITTEE )  
FEC ID number C00041269 )  
PO Box 89202 )  
Atlanta, GA 30312 )  
Kip Carr, Treasurer, )

IDAHO STATE DEMOCRATIC PARTY )  
FEC ID number C00010439 )  
P.O. Box 445 )  
Boise, ID 83701 )  
A.J. Balukoff, Treasurer, )

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INDIANA DEMOCRATIC )  
 CONGRESSIONAL VICTORY )  
 COMMITTEE )  
 FED ID number C00108613 )  
 115 W Washington St )  
 Ste 1165 )  
 Indianapolis, IN 46204 )  
 Henry Fernandez, Treasurer, )  
 )  
 IOWA DEMOCRATIC PARTY )  
 FEC ID number C00035600 )  
 5661 Fleur Drive )  
 Des Moines, IA 50321 )  
 Ken Sagar, Treasurer, )  
 )  
 KANSAS DEMOCRATIC PARTY )  
 FEC ID number C00019380 )  
 P.O. Box 1914 )  
 Topeka, KS 66601 )  
 Bill Hutton, Treasurer, )  
 )  
 KENTUCKY STATE DEMOCRATIC )  
 EXECUTIVE COMMITTEE )  
 FEC ID number C00011197 )  
 PO Box 694 )  
 Frankfort, KY 40602 )  
 M. Melinda Karns, Treasurer, )  
 )  
 DEMOCRATIC STATE CENTRAL )  
 COMMITTEE OF LA )  
 FEC ID number C00071365 )  
 PO Box 4385 )  
 Baton Rouge, LA 70821 )  
 Sean Bruno, Treasurer, )  
 )  
 MAINE DEMOCRATIC PARTY )  
 FEC ID number C00179408 )  
 PO Box 5258 )  
 320 Water St 3rd Floor )  
 Augusta, ME 04330-5258 )  
 Betty Johnson, Treasurer, )  
 )

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MASSACHUSETTS DEMOCRATIC )  
STATE COMMITTEE - FEDERAL FUND )  
FEC ID number C00089243 )  
11 Beacon Street, Suite 410 )  
Boston, MA 02108 )  
Paul G Yorkis, Treasurer, )  
)

MICHIGAN DEMOCRATIC STATE )  
CENTRAL COMMITTEE )  
FEC ID number C00031054 )  
606 Townsend St. )  
Lansing, MI 48933 )  
Sandy O'Brien, Treasurer, )  
)

MINNESOTA DEMOCRATIC-FARMER- )  
LABOR PARTY )  
FEC ID number C00025254 )  
255 Plato Blvd E )  
St Paul, MN 55107 )  
Tyler Moroles, Treasurer, )  
)

MISSISSIPPI DEMOCRATIC PARTY PAC )  
FEC ID number C00149641 )  
P.O. Box 1583 )  
Jackson, MS 39215 )  
Ryan Brown, Treasurer, )  
)

MISSOURI DEMOCRATIC STATE )  
COMMITTEE )  
FEC ID number C00135558 )  
300 St James St Suite 104 )  
Columbia, MO 65201 )  
Lauren Arthur, Treasurer, )  
)

MONTANA DEMOCRATIC PARTY )  
FEC ID number C00010033 )  
P.O. Box 802 )  
Helena, MT 59624 )  
Sandi Luckey, Treasurer, )  
)

NEVADA STATE DEMOCRATIC PARTY )  
FEC ID number C00208991 )  
409 Horn Street )  
Las Vegas, NV 89107 )  
Jan Churchill, Treasurer, )  
)

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NEW HAMPSHIRE DEMOCRATIC PARTY )  
FEC ID number C00178038 )  
105 N. State Street )  
Concord, NH 03301 )  
Brian Rapp, Treasurer, )  
)  
NEW JERSEY DEMOCRATIC STATE )  
COMMITTEE )  
FEC ID number C00104471 )  
196 West State Street )  
Trenton, NJ 08608 )  
Kelly Stewart Maer, Treasurer, )  
)  
DEMOCRATIC PARTY OF NEW MEXICO )  
FEC ID number C00161810 )  
322 Adams St SE )  
Albuquerque, NM 87108 )  
Robert Lara, Treasurer, )  
)  
NORTH CAROLINA DEMOCRATIC )  
PARTY – FEDERAL )  
FEC ID number C00165688 )  
220 Hillsborough Street )  
Raleigh, NC 27603 )  
Anna Tilghman, Treasurer, )  
)  
OHIO DEMOCRATIC PARTY )  
FEC ID number C00016899 )  
340 East Fulton Street )  
Columbus, OH 43215 )  
Fran Alberty, Treasurer, )  
)  
OKLAHOMA DEMOCRATIC PARTY )  
FEC ID number C00190934 )  
3700 N Classen, Suite 100 )  
Oklahoma City, OK 73118 )  
Rachael Hunsucker, Treasurer, )  
)  
DEMOCRATIC PARTY OF OREGON )  
FEC ID number C00188367 )  
232 NE 9th Ave. )  
Portland, OR 97232 )  
Eddy Morales, Treasurer, )  
)

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PENNSYLVANIA DEMOCRATIC PARTY )  
FEC ID number C00167130 )  
229 State St. )  
Harrisburg, PA 17101 )  
John A. Hanna, Treasurer, )  
)  
RHODE ISLAND DEMOCRATIC STATE )  
COMMITTEE )  
FEC ID number C00136200 )  
P.O. Box 6004 )  
Providence, RI 02940 )  
Jeffrey Padwa, Treasurer, )  
)  
DEMOCRATIC PARTY OF SOUTH )  
CAROLINA )  
FEC ID number C00007658 )  
P.O. Box 5965 )  
Columbia, SC 29250 )  
Kathryn Hensley, Treasurer, )  
)  
SOUTH DAKOTA DEMOCRATIC PARTY - )  
FEDERAL )  
FEC ID number C00160937 )  
P.O. Box 1485 )  
Sioux Falls, SD 57101 )  
Bill Nibbelink, Treasurer, )  
)  
TENNESSEE DEMOCRATIC PARTY )  
FEC ID number C00167346 )  
1900 Church St., Suite 203 )  
Nashville, TN 37203 )  
Dr. Geeta McMillan, Treasurer, )  
)  
TEXAS DEMOCRATIC PARTY )  
FEC ID number C00099267 )  
1106 Lavaca, Suite 100 )  
Austin, TX 78701 )  
Gilberto Hinojosa, Treasurer, )  
)  
UTAH STATE DEMOCRATIC )  
COMMITTEE )  
FEC ID number C00105973 )  
825 N 300 W )  
Suite C400 )  
Salt Lake City, UT 84103 )  
Peter Corroon, Treasurer, )

DEMOCRATIC PARTY OF VIRGINIA )  
 FEC ID number C00155952 )  
 919 East Main Street, Suite 2050 )  
 Richmond, VA 23219 )  
 Barbara Klear, Treasurer, )  
 )  
 WV STATE DEMOCRATIC EXECUTIVE )  
 COMMITTEE )  
 FEC ID number C00162578 )  
 P.O. Box 11926 )  
 Charleston, WV 25339 )  
 Jerry Brookover, Treasurer, )  
 )  
 DEMOCRATIC PARTY OF WISCONSIN )  
 FEC ID number C00019331 )  
 15 N. Pinckney St., Suite 200 )  
 Madison, WI 53703 )  
 Randy A. Udell, Treasurer, )  
 )  
 WY DEMOCRATIC STATE CENTRAL )  
 COMMITTEE )  
 FEC ID number C00001917 )  
 P.O. Box 1972 )  
 Cheyenne, WY 82003 )  
 Chris Russell, Treasurer, )  
 )  
*and* )  
 )  
 UNNAMED CO-CONSPIRATOR )  
 CONTRIBUTORS TO HILLARY VICTORY )  
 FUND, )  
 )  
*Respondents.* )

**VERIFIED COMPLAINT**

**Introduction**

This Complaint alleges an unprecedented, massive, nationwide multi-million dollar conspiracy among the Democratic National Committee ("DNC"); Democratic presidential candidate Hillary Rodham Clinton's joint fundraising committee ("JFC"), Hillary Victory Fund

“HVF”); Clinton’s presidential candidate committee, Hillary for America (“HFA”), 40 Democratic state parties, and an undetermined number of individual “super donors” to circumvent federal contribution limits and earmarking restrictions by effectively laundering nearly all contributions received by HVF through the state parties to the DNC, which contributed much of those funds to HFA, made coordinated expenditures with HFA, and otherwise granted control of those funds to HFA resulting in a *de facto* unlawful contribution. As explained below, this scheme allowed the DNC to receive tens of millions of dollars in contributions far exceeding federal limits.

Based on publicly available FEC records, repeatedly throughout the 2016 presidential campaign, HVF would purportedly transfer funds to its constituent political committees, which included between 34 and 40 state parties. On the very same day each of these transfers supposedly occurred, or occasionally the very next day, every single one of those state parties purportedly contributed all of those funds entirely to the DNC. The uniformity, regularity, magnitude, immediacy, and extent of these reported transfers—every single state party transferring every single disbursement it received from HVF, in its entirety, exclusively to the DNC, immediately upon receipt—inexorably leads to the compelling inference, supported by public statements, HVF’s members had an understanding or agreement to automatically funnel funds they received through HVF to the DNC.

The DNC, in turn, contributed most of those funds to HFA, made coordinated expenditures with HFA and otherwise transferred control of its money to HFA, as both the DNC’s own public filings and former DNC Chairwoman Donna Brazile’s public confessions make clear. In *McCutcheon v. FEC*, 134 S. Ct. 1434, 1455 (2014), the Supreme Court itself recognized this precise arrangement would flatly violate federal earmarking restrictions, 52 U.S.C. § 30116(a)(8); 11 C.F.R. § 110.6, though the Court dismissed the possibility of such a flagrantly illegal scheme

as “unlikely” to occur. Not even the Supreme Court could anticipate the extent to which the Democratic Party and its elite, wealthy donor class would commit willful felonies in a futile attempt to facilitate Clinton’s election.

Because funds state parties received through HVF were apparently “earmarked” to be immediately transferred to the DNC, each contribution to HVF qualifies as a contribution from the original source of the funds to the DNC itself, 11 C.F.R. § 110.6(a), (d)(2), causing most such contributions to grossly exceed federal limits of \$33,400 per person. 52 U.S.C. § 30116(a)(1)(B); FEC, *Price Index Adjustments for Contribution and Expenditure Limitations and Lobbyist Bundling Disclosure Threshold*, 80 FED. REG. 5,750, 5,752 (Feb. 3, 2015). Additionally, no contribution to HVF was properly reported to the FEC as a contribution entirely to the DNC. Any contributor to HVF who was expressly or implicitly assured contributions to HVF would be transferred to the DNC, or otherwise used for the benefit and at the direction of Clinton’s presidential campaign, would have been willful participants in the conspiracy to violate federal contribution limits, reporting requirements, and earmarking restrictions, and may be deemed unnamed co-conspirators.

On information and belief, it also reasonably appears state parties may have attempted to conceal their conspiracy by fabricating and erroneously reporting pass-through transactions. Even assuming the co-conspirators were wiring their funds across the nation, it appears extraordinarily unlikely that, on hundreds of occasions collectively involving tens of millions of dollars, HVF would have been able to transfer funds to 34-40 different state parties, each of those state parties would have received those funds and immediately transferred them to the DNC, *and* the DNC would have received those funds, all on the same day. Based on the eerily precise timing of these hundreds of transactions involving dozens of entities over more than a year—and the telling

absence of a few such entries—it appears far more plausible HVF did not actually transfer contributions it received to state parties, which in turn contributed them to the DNC (as the FEC filings of both the state parties themselves and the DNC contend occurred). Instead, it appears HVF may have transferred contributions it received directly to the DNC, and the entities involved falsely reported intermediate transfers that never occurred.

Even if the transfers did occur as reported, however, the virtually unbroken pattern demonstrates state parties were being used as intermediate pass-through entities to funnel over 80 million dollars in contributions HVF received to the DNC, in violation of federal contribution limits, earmarking restrictions, and reporting requirements. Likewise, assuming such transfers did occur, then at the very least many of the Respondent state parties transferred millions of dollars over dozens of transactions without properly reporting them. On numerous occasions, state parties reported receiving transfers from HVF, and the DNC reported receiving transfers from those state parties, but the state parties never reported contributing or transferring those funds to the DNC. At the very least, Democratic state parties throughout the nation failed to provide public transparency of their byzantine and intentionally convoluted financial transactions.

An FEC investigation is likely to confirm, however, the existence of an unprecedented scheme, staggering in scale, to solicit and accept tens of millions of dollars in earmarked contributions and launder them through dozens of state parties to the DNC to be used for the benefit, and subject to the control, of Hillary Clinton's presidential campaign, resulting in vastly excessive contributions to the DNC and HFA.

### **PARTIES**

1. Complainant COMMITTEE TO DEFEND THE PRESIDENT is a non-connected hybrid political committee registered with the Federal Election Commission ("FEC").

2. Respondent HILLARY VICTORY FUND ("HVF") is a federal joint fundraising committee ("JFC") registered with the FEC and an authorized committee of Respondent HILLARY RODHAM CLINTON. Its Treasurer is Respondent ELIZABETH JONES.

a. On September 16, 2015, HVF filed an amended Statement of Organization with the FEC disclosing it collects contributions, pays fundraising expenses, and disburses net proceeds for 35 political committees, including HILLARY FOR AMERICA, DNC, ALASKA DEMOCRATIC PARTY, DEMOCRATIC PARTY OF ARKANSAS, COLORADO DEMOCRATIC PARTY, DEMOCRATIC EXECUTIVE COMMITTEE OF FLORIDA, GEORGIA FEDERAL ELECTION COMMITTEE, IDAHO STATE DEMOCRATIC PARTY, INDIANA DEMOCRATIC CONGRESSIONAL VICTORY COMMITTEE, KENTUCKY STATE DEMOCRATIC CENTRAL EXECUTIVE COMMITTEE, DEMOCRATIC STATE CENTRAL COMMITTEE OF LA, MAINE DEMOCRATIC STATE COMMITTEE, MASSACHUSETTS DEMOCRATIC STATE COMMITTEE - FED FUND, MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE, MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY, MISSISSIPPI DEMOCRATIC PARTY PAC, MISSOURI DEMOCRATIC STATE COMMITTEE, MONTANA DEMOCRATIC PARTY, NEVADA STATE DEMOCRATIC PARTY, NEW HAMPSHIRE DEMOCRATIC PARTY, NORTH CAROLINA DEMOCRATIC PARTY - FEDERAL, OHIO DEMOCRATIC PARTY, OKLAHOMA DEMOCRATIC PARTY, DEMOCRATIC PARTY OF OREGON, PENNSYLVANIA DEMOCRATIC PARTY, Democratic Party of the Commonwealth of Puerto Rico [which is not a Respondent in this matter], RHODE ISLAND DEMOCRATIC STATE COMMITTEE, DEMOCRATIC PARTY OF SOUTH CAROLINA, TENNESSEE DEMOCRATIC PARTY, TEXAS DEMOCRATIC PARTY, UTAH STATE DEMOCRATIC COMMITTEE,

DEMOCRATIC PARTY OF VIRGINIA, WV STATE DEMOCRATIC EXECUTIVE COMMITTEE, DEMOCRATIC PARTY OF WISCONSIN, and WY DEMOCRATIC STATE CENTRAL COMMITTEE.

b. On November 2, 2015, HVF filed a second amended Statement of Organization with the FEC disclosing it collects contributions, pays fundraising expenses, and disburses net proceeds for only 34 political committees. The Democratic Party of the Commonwealth of Puerto Rico was no longer a member.

c. On July 1, 2016, HVF filed a third amended Statement of Organization with the FEC disclosing it collects contributions, pays fundraising expenses, and disburses net proceeds for 40 political committees. In addition to the committees identified in Paragraph 3(a)—with the exception of the Democratic Party of the Commonwealth of Puerto Rico—HVF's constituent members also included SOUTH DAKOTA DEMOCRATIC PARTY – FEDERAL, DEMOCRATIC STATE COMMITTEE (DELAWARE), IOWA DEMOCRATIC PARTY, KANSAS DEMOCRATIC PARTY, NEW JERSEY DEMOCRATIC STATE COMMITTEE, and DEMOCRATIC PARTY OF NEW MEXICO.

3. Respondent ELIZABETH JONES is Treasurer for Respondent HVF. This Complaint is brought against her in her official capacity as HVF's Treasurer.

4. Respondent HILLARY FOR AMERICA ("HFA") is a presidential candidate campaign committee registered with the FEC for 2016 Democratic nominee for President, Respondent HILLARY RODHAM CLINTON. Its Treasurer is Jose H. Villareal.

5. Respondent HILLARY RODHAM CLINTON was the 2016 Democratic nominee for President. HFA was her authorized principal candidate committee and HVF was also an

authorized committee of the candidate. This Complaint is brought against Clinton in her capacity as a candidate.

6. Respondent DNC SERVICES CORPORATION / DEMOCRATIC NATIONAL COMMITTEE ("DNC") is a national political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Respondent WILLIAM Q. DERROUGH.

7. Respondent WILLIAM Q. DERROUGH is Treasurer of Respondent DNC. This Complaint is brought against him in his official capacity as the DNC's Treasurer.

8. Respondent ALASKA DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Carolyn Covington.

9. Respondent DEMOCRATIC PARTY OF ARKANSAS is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Dawne Vandiver.

10. Respondent COLORADO DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Rita Simas.

11. Respondent DEMOCRATIC STATE COMMITTEE (DELAWARE) is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Helene Keeley.

12. Respondent DEMOCRATIC EXECUTIVE COMMITTEE OF FLORIDA is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Francesca Menes.

13. Respondent GEORGIA FEDERAL ELECTIONS COMMITTEE is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Kip Carr.

14. Respondent IDAHO STATE DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is A.J. Balukoff.

15. Respondent INDIANA DEMOCRATIC CONGRESSIONAL VICTORY COMMITTEE is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Henry Fernandez.

16. Respondent IOWA DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Ken Sager.

17. Respondent KANSAS DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Bill Hutton.

18. Respondent KENTUCKY STATE DEMOCRATIC EXECUTIVE COMMITTEE is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is M. Melinda Karns.

19. Respondent DEMOCRATIC STATE CENTRAL COMMITTEE OF LA is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Sean Bruno.

20. Respondent MAINE DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Betty Johnson.

21. Respondent MASSCHUSETTS DEMOCRATIC STATE COMMITTEE – FEDERAL FUND is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Paul G. Yorkis.

22. Respondent MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Sandy O'Brien.

23. Respondent MINNESOTA DEMOCRATIC-FARMER-LABOR PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Tyler Moroles.

24. Respondent MISSISSIPPI DEMOCRATIC PARTY PAC is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Ryan Brown.

25. Respondent MISSOURI DEMOCRATIC STATE COMMITTEE is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Lauren Arthur.

26. Respondent MONTANA DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Sandi Luckey.

27. Respondent NEVADA STATE DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Jan Churchill.

28. Respondent NEW HAMPSHIRE DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Brian Rapp.

29. Respondent NEW JERSEY DEMOCRATIC STATE COMMITTEE is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Kelly Stewart Maer.

30. Respondent DEMOCRATIC PARTY OF NEW MEXICO is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Robert Lara.

31. Respondent NORTH CAROLINA DEMOCRATIC PARTY – FEDERAL is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Anna Tilghman.

32. Respondent OHIO DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Fran Alberty.

33. Respondent OKLAHOMA DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Rachael Hunsucker.

34. Respondent DEMOCRATIC PARTY OF OREGON is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Eddy Morales.

35. Respondent PENNSYLVANIA DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is John A. Hanna.

36. Respondent RHODE ISLAND DEMOCRATIC STATE COMMITTEE is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Jeffrey Padwa.

37. Respondent DEMOCRATIC PARTY OF SOUTH CAROLINA is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Kathryn Hensley.

38. Respondent SOUTH DAKOTA DEMOCRATIC PARTY – FEDERAL is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Bill Nibelink.

39. Respondent TENNESSEE DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Geeta McMillan.

40. Respondent TEXAS DEMOCRATIC PARTY is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Gilberto Hinojosa.

41. Respondent UTAH STATE DEMOCRATIC COMMITTEE is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Peter Corroon.

42. Respondent DEMOCRATIC PARTY OF VIRGINIA is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Barbara Klear.

43. Respondent WV STATE DEMOCRATIC EXECUTIVE COMMITTEE is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Jerry Brookover.

44. Respondent DEMOCRATIC PARTY OF WISCONSIN is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Randy A. Udell.

45. Respondent WV DEMOCRATIC STATE CENTRAL COMMITTEE is a state political party committee affiliated with the Democratic Party and registered with the FEC. Its Treasurer is Chris Russell.

#### **RELEVANT CAMPAIGN FINANCE LAWS**

46. Contribution Limits—52 U.S.C. § 30116(a)(1)(B), as adjusted for inflation by 80 FED. REG. at 5,752, permitted a person to contribute no more than \$33,400 per year to a national political party committee's principal account during the 2015-16 election cycle.<sup>1</sup>

47. Reporting Requirements—52 U.S.C. § 30104(a)(4) requires “[a]ll political committees other than authorized committees of a candidate” to file periodic reports with the FEC.

a. Section 30104(b)(2)(C), (F) specify such reports must disclose the total amount of “contributions from other political committees” and “transfers from affiliated committees and, where the reporting committees is a political party committee, transfers from other political party committees, regardless of whether such committees are affiliated.”

b. Section 30104(b)(3)(B), (D) specify such reports for political party committees must disclose each transfer of funds from another political committee.

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<sup>1</sup> Federal law also allows a person to contribute up to \$100,200 to each *McCutcheon* account of a national political party committee established for specific purposes, including presidential nominating conventions, recounts, and headquarters buildings. 52 U.S.C. § 30116(a)(1)(B), (a)(9)(A)-(C). These accounts are not pertinent to this Complaint.

c. Section 30104(b)(4)(C) specifies such reports for political party committees must disclose “transfers to other political party committees, regardless of whether they are affiliated.”

d. Section 30104(b)(5)(C) specifies such reports for political party committees must disclose “each transfer of funds . . . to another political party committee, regardless of whether such committees are affiliated, together with the date and amount of such transfers.”

e. Section 30104(b)(6)(B)(i) specifies such reports for non-authorized committees must disclose the “date and amount” of any contribution to a political committee.

48. Earmarking Prohibitions—52 U.S.C. § 30116(a)(8) provides, “[A]ll contributions made by a person, either directly or indirectly, on behalf of a particular candidate, including contributions which are in any way earmarked or otherwise directed through an intermediary or conduit to such candidate, shall be treated as contributions from such person to such candidate. The intermediary or conduit shall report the original source and the intended recipient of such contribution to the Commission and to the intended recipient.” *Accord* 11 C.F.R. § 110.6(a), (c)(1)(i).

49. Prohibition on Contributions in the Name of Another—52 U.S.C. § 30122 provides, “No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.”

**ACCORDING TO PUBLICLY AVAILABLE FEC REPORTS,  
CONTRIBUTIONS WERE CONSISTENTLY FUNNELED FROM THE  
HILLARY VICTORY FUND THROUGH STATE PARTIES TO THE DNC**

50. According to reports filed with the FEC by HVF, the DNC, and dozens of Democratic state parties, for more than a year, over 80 million dollars in contributions to HVF

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were funneled through state parties to the DNC, which made coordinated expenditures with the Clinton campaign and was controlled by it.

51. According to reports filed with the FEC, in each series of transactions, HVF disbursed contributions it received to its state party committee members (as required for JFCs) and those state parties received the funds the same day. HVF would disburse funds to up to 40 state parties at a time. That same day, or on occasion the very next day, each and every one of those state parties immediately contributed all of the funds to the DNC.

52. It appears virtually every single disbursement from HVF to a state party resulted in an immediate transfer of the same amount of funds from the state party to the DNC. Over 99% of funds transferred through HVF to state parties wound up at the DNC (which, as explained below, made coordinated expenditures with HFA and otherwise spent its funds subject to the oversight, direction, and control of HFA).

53. The uniformity, regularity, magnitude, immediacy, and extent of these reported transfers—every single state party transferring every single disbursement it received from HVF, in its entirety, exclusively to the DNC, immediately upon receipt—unavoidably implies HVF's members had an understanding or agreement they would automatically funnel funds they received through HVF to the DNC.

54. Exhibit 1 to this Complaint is an Excel spreadsheet derived exclusively from publicly available FEC reports filed by Respondents. Each row reflects a separate occasion on which contributions to HVF flowed through state parties directly to the DNC, usually on the same day and no later than the next day. Each row contains citations to the specific FEC reports documenting each step of each purported transaction.

55. As discussed at greater length below, several of these alleged transactions were reported incompletely. HVF reported transferring funds to a state party, but that party never reported receiving them and/or contributing them to the DNC. The DNC nevertheless reported receiving the same amount of funds from that state party on the same day. At a minimum, millions of dollars in financial transactions among these Democratic political committees were omitted from statutorily required public reports, thereby hindering public scrutiny.

56. It defies credulity to believe that, on hundreds of occasions, dozens of state parties around the country all independently received tens or hundreds of thousands of dollars from HVF, immediately decided to transfer all of those funds to the DNC, and successfully executed those transactions all on the same day. On information and belief, it is also reasonably possible the alleged transfers of HVF's funds to state parties never actually occurred, and all of the funds at issue were actually transferred directly from HVF to the DNC, rendering all FEC reports concerning these alleged transactions fraudulent. In the alternative, public statements indicate the JFC and/or HFA may have moved some funds in and out of participants' accounts without the state parties' knowledge or permission, thus never actually devolving custody or control of the funds to the state parties. Kenneth P. Vogel & Isaac Arnsdorf, *Clinton Fundraising Leaves Little for State Parties*, POLITICO (May 2, 2016, 5:21 A.M.) ("While state party officials were made aware that Clinton's campaign would control the movement of the funds between participating committees, one operative who has relationships with multiple state parties said that some of their officials have complained that they weren't notified of the transfers into and out of their accounts until after the fact."), at <https://www.politico.com/story/2016/04/clinton-fundraising-leaves-little-for-state-parties-222670>. If the JFC, HFA, or either of those entities' Treasurers retained control of the JFC's funds even after they had been transferred into the state parties' accounts, those

transfers would be shell transactions attempting to camouflage the unlawful transfer of JFC-controlled funds to the DNC.

57. Each alleged transaction followed the identical structure:

a. HVF reported transferring a certain amount of funds to its state party members on a particular day. For example, as discussed below HVF reported transferring a total of \$505,000 to 17 of its state party members on November 2, 2015, including \$43,500 to the Alaska Democratic Party. *See* Exhibit 1, Row 15 (citing FEC Report # FEC-1180810 (amended), page 1387, Transaction ID # D22506).

b. Except as otherwise noted, each of those state party members reported receiving transfers in the identical amounts of funds from HVF on the very same day. For example, the Alaska Democratic Party reported receiving \$43,500 from HVF on November 2, 2015. *See* Exhibit 1, Row 15 (citing FEC Report ID # FEC-1036643, page 36, Transaction ID # VR029EM5A75).

c. Except as otherwise noted, each of those state party members then reported contributing the same amount of money they received from HVF to the DNC on the very same day (or occasionally the next day). For example, the Alaska Democratic Party reported transferring \$43,500 to the DNC on November 2, 2015. *See* Exhibit 1, Row 15 (citing FEC Report # FEC-1036643, page 53, Transaction ID # VQZ31A45P85).

d. Finally, the DNC reported receiving the same amount of funds, generally on the same day. For example, the DNC reported receiving \$43,500 from the Alaska Democratic Party on November 1 [sic], 2015. *See* Exhibit 1, Row 15 (citing FEC Report # FEC-1039017 (amended), page 6204, Transaction ID # C32017336). This particular example, which suggests the

DNC received the \$43,500 *before* it had been transferred, shows how many of the transfers in this complex scheme were inconsistently or inaccurately reported.

e. Each transfer of funds from HVF, allegedly through a state party committee, to the DNC is recorded in a separate row of Exhibit 1. The last cell in each row cites the specific FEC reports that document—or fail to document—each step of the transaction. For example, Row 15 of Exhibit 1 sets explains the \$43,500 transfer through the Alaska Democratic Party:

History	Transfer	Alaska Democratic Party	Transfer	Transfer	Transfer	1. Report ID: FEC-1180810 (A), Page: 1387, Transaction ID: 022506 2. Report ID: FEC-1036643, Page: 36, Transaction ID: W0226246A75 3. Report ID: FEC-1036643, Page: 53, Transaction ID: W0221445P05 4. Report ID: FEC-1038017 (A), Page: 6204, Transaction ID: C32017336
Fund	11/2/2015	\$43,500.00 to Affiliate	11/2/2015	\$43,500.00 to Affiliate	11/2/2015	\$43,500.00 DNC

f. Through hundreds of transactions with this identical structure outlined in Exhibit 1, HVF funneled over 80 million dollars through state parties directly to the DNC, starting in October 2015.

58. **October 2015**—HVF reported transferring a total of \$216,000 to 9 of its member state party committees on October 1, 2015. *See* Exhibit 1, Rows 2-10. The amount of each individual transfer was \$24,000. *Id.* Each of those 9 state party committees reported receiving a transfer of \$24,000 from HVF that same day. *Id.* Each of those 9 state party committees also reported transferring precisely the same amount of funds to the DNC on the same day or the very next day, October 2, 2015. *Id.* The DNC reported receiving transfers of \$24,000 from each of those committees on October 2, 2015. *Id.* Through these transactions, a total of \$216,000 was transferred from HVF, through 9 state party committees, to the DNC on or about October 1, 2015. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

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Entity	Date	Amount	To	From	Report ID	Page	Transaction ID
Haley Victory Fund	10/1/2015	\$24,000.00	to Affiliate	Main Dem Party	FEC-1180810 (A1), Page: 1393	1393	Transaction ID: 022177
Haley Victory Fund	10/1/2015	\$24,000.00	to Affiliate	Main Dem Party	FEC-1180810 (A1), Page: 1393	1393	Transaction ID: 022177
Haley Victory Fund	10/1/2015	\$24,000.00	to Affiliate	Main Dem Party	FEC-1180810 (A1), Page: 1393	1393	Transaction ID: 022177
Haley Victory Fund	10/1/2015	\$24,000.00	to Affiliate	Main Dem Party	FEC-1180810 (A1), Page: 1393	1393	Transaction ID: 022177
Haley Victory Fund	10/1/2015	\$24,000.00	to Affiliate	Main Dem Party	FEC-1180810 (A1), Page: 1393	1393	Transaction ID: 022177
Haley Victory Fund	10/1/2015	\$24,000.00	to Affiliate	Main Dem Party	FEC-1180810 (A1), Page: 1393	1393	Transaction ID: 022177
Haley Victory Fund	10/1/2015	\$24,000.00	to Affiliate	Main Dem Party	FEC-1180810 (A1), Page: 1393	1393	Transaction ID: 022177
Haley Victory Fund	10/1/2015	\$24,000.00	to Affiliate	Main Dem Party	FEC-1180810 (A1), Page: 1393	1393	Transaction ID: 022177
Haley Victory Fund	10/1/2015	\$24,000.00	to Affiliate	Main Dem Party	FEC-1180810 (A1), Page: 1393	1393	Transaction ID: 022177
Haley Victory Fund	10/1/2015	\$24,000.00	to Affiliate	Main Dem Party	FEC-1180810 (A1), Page: 1393	1393	Transaction ID: 022177

59. HVF reported transferring a total of \$48,000 to two of its other member state party committees, also on October 1, 2015, including \$24,000 each to the Mississippi Democratic Party and the Utah State Democratic Committee. See Exhibit 1, Rows 12-13. Neither of those entities reported receiving any transfers from the HVF on or about that day, however. *Id.* And neither of those entities reported transferring funds to the DNC on or about that day. *Id.* Nevertheless, the DNC reported receiving transfers of \$24,000 each from the Mississippi Democratic Party and Utah State Democratic Committee on October 2, 2015. *Id.* Through these transactions, a total of \$48,000 was transferred from HVF, purportedly through two additional state party committees, to the DNC on or about October 2, 2015. It is reasonably possible HVF never actually transferred funds to these or any other state parties on or about October 2, 2015, but rather transferred those funds directly to the DNC, and/or some or all of these state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Entity	Date	Amount	To	From	Report ID	Page	Transaction ID
Haley Victory Fund	10/2/2015	\$24,000.00	to Affiliate	Miss Dem Party	FEC-1180810 (A1), Page: 1374	1374	Transaction ID: 022180
Haley Victory Fund	10/2/2015	\$24,000.00	to Affiliate	Utah State Democratic Committee	FEC-1180810 (A1), Page: 1374	1374	Transaction ID: 022180

60. **November 2015**—HVF reported transferring a total of \$505,000 to 17 of its member state party committees on November 2, 2015. *See* Exhibit 1, Rows 15-31. The amount of each individual transfer was between \$19,500 and \$45,000. *Id.* Each of those 17 state party committees reported receiving a transfer from HVF that same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of those 17 state party committees also reported transferring precisely the same amount of funds to the DNC on the same day. *Id.* The DNC reported receiving transfers from those committees on November 1 [sic], 2015, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$505,000 was transferred from HVF, through 17 state party committees, to the DNC on or about November 2, 2015. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

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Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Alaska Democratic Party	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	1. Report ID: FEC-1180810 (A), Page: 1387, Transaction ID: 022506 2. Report ID: FEC-1036643, Page: 36, Transaction ID: VRO29M5475 3. Report ID: FEC-1036643, Page: 33, Transaction ID: VGE21M5493 4. Report ID: FEC-1039017 (A), Page: 6294, Transaction ID: C32017316 5. Report ID: FEC-1180810 (A), Page: 1391, Transaction ID: 022507 6. Report ID: FEC-1088879 (A3), Page: 31, Transaction ID: 12-08-00001-00001 7. Report ID: FEC-1088879 (A3), Page: 43, Transaction ID: 23-08-00007-00002 8. Report ID: FEC-1039017 (A), Page: 6294, Transaction ID: C32017317 9. Report ID: FEC-1180810 (A), Page: 1388, Transaction ID: 022508 10. Report ID: FEC-1180810 (A), Page: 96, Transaction ID: VRO84M5632 11. Report ID: FEC-1180810 (A), Page: 112, Transaction ID: VMC20A4585 12. Report ID: FEC-1039017 (A), Page: 6294, Transaction ID: C32017322 13. Report ID: FEC-1180810 (A), Page: 1393, Transaction ID: 022509 14. Report ID: FEC-1036925, Page: 66, Transaction ID: D479106 15. Report ID: FEC-1039017 (A), Page: 6296, Transaction ID: C32017349 16. Report ID: FEC-1180810 (A), Page: 1396, Transaction ID: 022509 17. Report ID: FEC-1123433 (A2), Page: 69, Transaction ID: VPK5G48478 18. Report ID: FEC-1123433 (A2), Page: 81, Transaction ID: VPK5G48478 19. Report ID: FEC-1039017 (A), Page: 6296, Transaction ID: C32017336 20. Report ID: FEC-1180810 (A), Page: 1383, Transaction ID: C32017334 21. Report ID: FEC-1036643, Page: 27, Transaction ID: 12-13-00007-00007 22. Report ID: FEC-1039017 (A), Page: 6296, Transaction ID: C32017334 23. Report ID: FEC-1180810 (A), Page: 1385, Transaction ID: 022495 24. Report ID: FEC-1054424 (A), Page: 58, Transaction ID: V99B4M68927 25. Report ID: FEC-1054424 (A), Page: 65, Transaction ID: VPK5G48478 26. Report ID: FEC-1180810 (A), Page: 1372, Transaction ID: C32017373 27. Report ID: FEC-1071842 (A), Page: 35, Transaction ID: 12-13-00006-00006 28. Report ID: FEC-1071842 (A), Page: 49, Transaction ID: 22-03-00006-00005 29. Report ID: FEC-1039017 (A), Page: 6307, Transaction ID: C32017325 30. Report ID: FEC-1180810 (A), Page: 1372, Transaction ID: C32017373 31. Report ID: FEC-1071842 (A), Page: 23, Transaction ID: C10328180 32. Report ID: FEC-1071842 (A), Page: 34, Transaction ID: 0582166 33. Report ID: FEC-1039017 (A), Page: 6297, Transaction ID: C32017339 34. Report ID: FEC-1180810 (A), Page: 1393, Transaction ID: 022498 35. Report ID: FEC-1039017 (A), Page: 6297, Transaction ID: 12-30-00002-00002 36. Report ID: FEC-1039017 (A), Page: 6297, Transaction ID: 12-30-00002-00002 37. Report ID: FEC-1039017 (A), Page: 6297, Transaction ID: 12-30-00002-00002 38. Report ID: FEC-1039017 (A), Page: 6297, Transaction ID: 12-30-00002-00002 39. Report ID: FEC-1180810 (A), Page: 1374, Transaction ID: 022510 40. Report ID: FEC-1040606 (A), Page: 90, Transaction ID: 0773253 41. Report ID: FEC-1039017 (A), Page: 6298, Transaction ID: C32017325 42. Report ID: FEC-1180810 (A), Page: 1380, Transaction ID: 022903 43. Report ID: FEC-1049108 (A), Page: 1A, Transaction ID: C3779775 44. Report ID: FEC-1049108 (A), Page: 2A, Transaction ID: 0659559 45. Report ID: FEC-1039017 (A), Page: 6298, Transaction ID: C32017331 46. Report ID: FEC-1180810 (A), Page: 1395, Transaction ID: 022499 47. Report ID: FEC-1038846, Page: 14, Transaction ID: 12-04-00004-00004 48. Report ID: FEC-1038846, Page: 21, Transaction ID: 22-04-00005-00005 49. Report ID: FEC-1039017 (A), Page: 6298, Transaction ID: C32017337 50. Report ID: FEC-1180810 (A), Page: 1373, Transaction ID: 022500 51. Report ID: FEC-1037905, Page: 8, Transaction ID: 5A12.24057 52. Report ID: FEC-1037905, Page: 12, Transaction ID: 5A12.24058 53. Report ID: FEC-1039017 (A), Page: 6298, Transaction ID: C32017329 54. Report ID: FEC-1180810 (A), Page: 1381, Transaction ID: 022511 55. Report ID: FEC-1036992, Page: 82, Transaction ID: 12-30-00001-00001 56. Report ID: FEC-1036992, Page: 93, Transaction ID: 22-30-00001-00002 57. Report ID: FEC-1039017 (A), Page: 6299, Transaction ID: C32017341 58. Report ID: FEC-1180810 (A), Page: 1381, Transaction ID: 022504 59. Report ID: FEC-1037129 (A), Page: 15, Transaction ID: 12-12-00003-00003 60. Report ID: FEC-1037129 (A), Page: 29, Transaction ID: 22-12-00004-00004 61. Report ID: FEC-1039017 (A), Page: 6682, Transaction ID: C32017333 62. Report ID: FEC-1180810 (A), Page: 1385, Transaction ID: 022505 63. Report ID: FEC-1071253 (A), Page: 34, Transaction ID: VPK5G48478 64. Report ID: FEC-1071253 (A), Page: 38, Transaction ID: VPK5G48478 65. Report ID: FEC-1039017 (A), Page: 6682, Transaction ID: C32017333
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Colorado Democratic Party	Transfer from Affiliate	11/2/2015	\$45,000.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$45,000.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$45,000.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Dem. Elec. Com. Fl.	Transfer from Affiliate	11/2/2015	\$21,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$21,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$21,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	GA Fed. Election Com.	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Iowa State Dem. Party	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Maine Dem. Party	Transfer from Affiliate	11/2/2015	\$15,000.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$15,000.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$15,000.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Mass. Dem. State Com.	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Michigan Central Com.	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Miss. Dem. Party	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	MD Dem. State Com.	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	MT Dem. Party	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Democratic Party of Virginia	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Pennsylvania Democratic Party	Transfer from Affiliate	11/2/2015	\$21,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$21,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$21,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	South Island Democratic Party	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Texas Democratic Party	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$43,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	West Virginia Democratic Party	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	
Hilary Victory Fund	11/2/2015	Transfer from Affiliate	Utah State Dem. Party	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	11/2/2015	Transfer from Affiliate	11/2/2015	\$19,500.00	DNC	

61. HVF reported transferring a total of \$102,000 to four of its other member state party committees, also on November 2, 2015, including \$19,500 to the Mississippi Democratic Party, \$19,500 to the Democratic Party of South Carolina, \$43,500 to the Tennessee Democratic Party, and \$19,500 to the Utah State Democratic Party. *See* Exhibit 1, Rows 33-36. None of those entities reported receiving any transfers from the HVF on or about that day, however. *Id.* And none of those entities reported transferring funds to the DNC on or about that day. *Id.* Nevertheless, the DNC reported receiving transfers in the same amounts of money, from those same parties, on November 1 [sic], 2015. *Id.* Through these transactions, a total of \$102,000 was transferred from HVF, purportedly through four additional state party committees, to the DNC on or about November 2, 2015. It is reasonably possible HVF never actually transferred funds to these or any other state parties on or about November 2, 2015, but rather transferred those funds directly to the

DNC, and/or these state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Hilary Victory Fund	11/7/2015	\$19,500.00	Transfer to Affiliate	Miss. Dem. Party	Transfer from Affiliate	DNC	Transfer from Affiliate	11/7/2015	\$19,500.00	1. Report ID: FEC-1180810 (A), Page: 1390, Transaction ID: 022497 2. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 3. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 4. Report ID: FEC-1039017 (A), Page: 6209, Transaction ID: C32017235
Hilary Victory Fund	11/7/2015	\$19,500.00	Transfer to Affiliate	Democratic Party of South Carolina	Transfer from Affiliate	DNC	Transfer from Affiliate	11/7/2015	\$19,500.00	1. Report ID: FEC-1180810 (A), Page: 1376, Transaction ID: 022501 2. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 3. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 4. Report ID: FEC-1039017 (A), Page: 6209, Transaction ID: C32017334
Hilary Victory Fund	11/7/2015	\$43,500.00	Transfer to Affiliate	Tennessee Democratic Party	Transfer from Affiliate	DNC	Transfer from Affiliate	11/7/2015	\$43,500.00	1. Report ID: FEC-1180810 (A), Page: 1378, Transaction ID: 022517 2. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 3. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 4. Report ID: FEC-1039017 (A), Page: 6209, Transaction ID: C32017340
Hilary Victory Fund	11/7/2015	\$19,500.00	Transfer to Affiliate	Utah State Democratic Committee	Transfer from Affiliate	DNC	Transfer from Affiliate	11/7/2015	\$19,500.00	1. Report ID: FEC-1180810 (A), Page: 1376, Transaction ID: 022502 2. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 3. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 4. Report ID: FEC-1039017 (A), Page: 6463, Transaction ID: C32017230

62. **December 2015**—HVF reported transferring a total of \$799,400 to 26 of its member state party committees on December 1, 2015. *See* Exhibit 1, Rows 38-63. The amount of each individual transfer was between \$14,600 and \$66,200. *Id.* Each of those 26 state party committees reported receiving a transfer from HVF that same day or the next day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of those 26 state party committees also reported transferring precisely the same amount of funds to the DNC on either December 1 or 2, 2015—except for the Colorado Democratic Party, which reported it transferred its funds to the DNC on December 7. *Id.* The DNC nevertheless reported receiving transfers from all those committees (including Colorado) on December 2, 2015, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$799,400 was transferred from HVF, through 26 state party committees, to the DNC on or about December 1, 2015. The fact the DNC reported receiving all 26 transfers on the same date of December 2, 2015, despite the fact state party committees reported making the transfers at different times (including December 7) makes it reasonably possible HVF never actually transferred funds to these or any other state parties on or about December 1, 2015, but rather transferred those funds directly to the DNC. It is also reasonably possible some or all of these state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

DUPLICATE

Entity	Date	Amount	To/From	Party	Report ID	Page	Transaction ID
HVFA Victory Fund	12/1/2015	\$20,600.00	Transfer to Affiliate	Alaska Democratic Party			1. Report ID: FEC-138010 (A1), Page: 1385, Transaction ID: 060729 2. Report ID: FEC-104560, Page: 71, Transaction ID: 570241176 3. Report ID: FEC-104560, Page: 107, Transaction ID: 10251643904 4. Report ID: FEC-104560, Page: 6257, Transaction ID: C31202307 5. Report ID: FEC-1180510 (A1), Page: 1381, Transaction ID: 060657
HVFA Victory Fund	12/1/2015	\$21,000.00	Transfer to Affiliate	Colorado Democratic Party			1. Report ID: FEC-128953 (A2), Page: 81, Transaction ID: 116440001400001 2. Report ID: FEC-128953 (A2), Page: 91, Transaction ID: 124460000400004 3. Report ID: FEC-104560, Page: 6157, Transaction ID: C31202303 4. Report ID: FEC-1180510 (A1), Page: 1376, Transaction ID: C31202305 5. Report ID: FEC-1180510 (A2), Page: 60, Transaction ID: 10238483780 6. Report ID: FEC-104560, Page: 104, Transaction ID: 10222441446 7. Report ID: FEC-1180510 (A1), Page: 1372, Transaction ID: 062760 8. Report ID: FEC-1180510 (A2), Page: 18, Transaction ID: 10232517026 9. Report ID: FEC-1180510 (A1), Page: 43, Transaction ID: 10224470020 10. Report ID: FEC-104560, Page: 6260, Transaction ID: C31202316 11. Report ID: FEC-1180510 (A1), Page: 1384, Transaction ID: 060653 12. Report ID: FEC-104560, Page: 6260, Transaction ID: C31202308 13. Report ID: FEC-104560, Page: 107, Transaction ID: 0419526 14. Report ID: FEC-104560, Page: 6259, Transaction ID: C31202308 15. Report ID: FEC-1180510 (A1), Page: 1375, Transaction ID: 060654 16. Report ID: FEC-1180510 (A2), Page: 91, Transaction ID: 10143101255 17. Report ID: FEC-1180510 (A1), Page: 103, Transaction ID: 10143101255 18. Report ID: FEC-104560, Page: 6259, Transaction ID: C31202316 19. Report ID: FEC-1180510 (A1), Page: 1381, Transaction ID: 060728 20. Report ID: FEC-104560, Page: 6259, Transaction ID: C31202316 21. Report ID: FEC-104560, Page: 107, Transaction ID: 0641700 22. Report ID: FEC-1180510 (A1), Page: 1375, Transaction ID: 060654 23. Report ID: FEC-1180510 (A2), Page: 91, Transaction ID: 10143101255 24. Report ID: FEC-104560, Page: 6259, Transaction ID: C31202316 25. Report ID: FEC-1180510 (A1), Page: 1381, Transaction ID: 060728 26. Report ID: FEC-104560, Page: 6259, Transaction ID: C31202316 27. Report ID: FEC-104560, Page: 107, Transaction ID: 0641700 28. Report ID: FEC-104560, Page: 6259, Transaction ID: C31202316 29. Report ID: FEC-104560, Page: 107, Transaction ID: 0641700 30. Report ID: FEC-1180510 (A1), Page: 1377, Transaction ID: 060654 31. Report ID: FEC-104560, Page: 23, Transaction ID: 11310001000010 32. Report ID: FEC-104560, Page: 76, Transaction ID: 121940001400001 33. Report ID: FEC-104560, Page: 6260, Transaction ID: C31202309 34. Report ID: FEC-1180510 (A1), Page: 1384, Transaction ID: 060655 35. Report ID: FEC-1071244 (A1), Page: 56, Transaction ID: 113440001400001 36. Report ID: FEC-1071244 (A1), Page: 54, Transaction ID: 721940001400001 37. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202301 38. Report ID: FEC-1180510 (A1), Page: 1385, Transaction ID: 060729 39. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 40. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 41. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 42. Report ID: FEC-104560, Page: 18, Transaction ID: 113440001400001 43. Report ID: FEC-104560, Page: 18, Transaction ID: 113440001400001 44. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202301 45. Report ID: FEC-1180510 (A1), Page: 1385, Transaction ID: 060729 46. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 47. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 48. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 49. Report ID: FEC-104560, Page: 18, Transaction ID: 113440001400001 50. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202301 51. Report ID: FEC-1180510 (A1), Page: 1385, Transaction ID: 060729 52. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 53. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 54. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 55. Report ID: FEC-104560, Page: 18, Transaction ID: 113440001400001 56. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202301 57. Report ID: FEC-1180510 (A1), Page: 1385, Transaction ID: 060729 58. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 59. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 60. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 61. Report ID: FEC-104560, Page: 18, Transaction ID: 113440001400001 62. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202301 63. Report ID: FEC-1180510 (A1), Page: 1385, Transaction ID: 060729 64. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 65. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 66. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 67. Report ID: FEC-104560, Page: 18, Transaction ID: 113440001400001 68. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202301 69. Report ID: FEC-1180510 (A1), Page: 1385, Transaction ID: 060729 70. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 71. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 72. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 73. Report ID: FEC-104560, Page: 18, Transaction ID: 113440001400001 74. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202301 75. Report ID: FEC-1180510 (A1), Page: 1385, Transaction ID: 060729 76. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 77. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 78. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 79. Report ID: FEC-104560, Page: 18, Transaction ID: 113440001400001 80. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202301 81. Report ID: FEC-1180510 (A1), Page: 1385, Transaction ID: 060729 82. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 83. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 84. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 85. Report ID: FEC-104560, Page: 18, Transaction ID: 113440001400001 86. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202301 87. Report ID: FEC-1180510 (A1), Page: 1385, Transaction ID: 060729 88. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 89. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 90. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 91. Report ID: FEC-104560, Page: 18, Transaction ID: 113440001400001 92. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202301 93. Report ID: FEC-1180510 (A1), Page: 1385, Transaction ID: 060729 94. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 95. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 96. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316 97. Report ID: FEC-104560, Page: 18, Transaction ID: 113440001400001 98. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202301 99. Report ID: FEC-1180510 (A1), Page: 1385, Transaction ID: 060729 100. Report ID: FEC-104560, Page: 6261, Transaction ID: C31202316

63. HVF reported transferring a total of \$83,600 to two of its other member state party committees, also on December 1, 2015, including \$63,000 to the Democratic Party of Arkansas and \$20,600 to the Massachusetts Democratic State Committee. *See Exhibit 1, Rows 65-66. Both*

of those entities reported receiving transfers from the HVF for the same amount of funds either the same day or the next day. *Id.* Neither of those entities reported transferring funds to the DNC on or about that day. *Id.* Nevertheless, the DNC reported receiving \$63,000 from the Democratic Party of Arkansas and \$20,600 from the Massachusetts Democratic State Committee on December 2, 2015. Through these transactions, a total of \$83,600 was transferred from HVF, purportedly through two additional state party committees, to the DNC on or about December 2, 2015. It is reasonably possible HVF never actually transferred funds to these or any other state parties on or about December 2, 2015, but rather transferred those funds directly to the DNC. It is also reasonably possible these state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Holder:	Transfer:	Democratic Party of Arkansas	Transfer:	from	to	Transfer:
Victory Fund	12/2/2015	\$63,000.00	12/2/2015	\$63,000.00	to	DNC
Holder:	Transfer:	Mass. Dem. State Comm.	Transfer:	from	to	Transfer:
Victory Fund	12/2/2015	\$20,600.00	12/2/2015	\$20,600.00	to	DNC

Transfer:	from	to	Transfer:
DNC	12/2/2015	\$83,600.00	12/2/2015

1. Report ID: FEC-112810 (A1), Page: 1176, Transaction ID: 080791  
 2. Report ID: FEC-1076119A-11, Page: 46, Transaction ID: 13-48-00001-00001  
 3. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported  
 4. Report ID: FEC-0945800, Page: 6257, Transaction ID: C32202182  
 5. Report ID: FEC-112810 (A1), Page: 1176, Transaction ID: 080791  
 6. Report ID: FEC-112817 (A1), Page: 1176, Transaction ID: 5998A101704  
 7. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported  
 8. Report ID: FEC-1076119A-11, Page: 46, Transaction ID: 13-48-00001-00001

64. **January 2016**—HVF reported transferring a total of \$1,527,278.19 to 16 of its member state party committees on January 4, 2016. *See* Exhibit 1, Rows 68-83. The amount of each individual transfer was between \$70,000 and \$207,278.19. *Id.* Each of those 16 state party committees reported receiving a transfer from HVF that same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of those 16 state party committees also reported transferring precisely the same amount of funds to the DNC on the same day (except for the Wisconsin Democratic Party, which reported transferring \$207,000 rather than \$207,278.18). *Id.* The DNC reported receiving transfers from all those committees, including \$207,000 from the Wisconsin Democratic Party, on the same day (January 4, 2016), with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$1,527,000 was transferred from HVF, through 16 state party

committees, to the DNC on January 4, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Party	Date	Amount	To	From	Party	Date	Amount	To	From	Party	Date	Amount	To	From	Party	Date	Amount	To	From	
Kentucky Victory Fund	1/4/2016	\$70,000.00	to Affiliate	Democratic Party	Kentucky Victory Fund	1/4/2016	\$70,000.00	to Affiliate	Democratic Party	Kentucky Victory Fund	1/4/2016	\$70,000.00	to Affiliate	Democratic Party	Kentucky Victory Fund	1/4/2016	\$70,000.00	to Affiliate	Democratic Party	
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Dem. St. Central Comm IA	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Dem. St. Central Comm IA	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Dem. St. Central Comm IA	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Dem. St. Central Comm IA	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of Arkansas	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of Arkansas	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of Arkansas	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of Arkansas	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	GA Fed. Election Com.	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	GA Fed. Election Com.	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	GA Fed. Election Com.	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	GA Fed. Election Com.	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Maine State Party of Affiliates	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Maine State Party of Affiliates	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Maine State Party of Affiliates	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Maine State Party of Affiliates	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Indiana Dem. Cong. Member Circo.	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Indiana Dem. Cong. Member Circo.	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Indiana Dem. Cong. Member Circo.	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Indiana Dem. Cong. Member Circo.	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$150,000.00	to Affiliate	Miss. Dem. Party	Kentucky Victory Fund	1/4/2016	\$150,000.00	to Affiliate	Miss. Dem. Party	Kentucky Victory Fund	1/4/2016	\$150,000.00	to Affiliate	Miss. Dem. Party	Kentucky Victory Fund	1/4/2016	\$150,000.00	to Affiliate	Miss. Dem. Party	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	NC Dem. Party Fed.	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	NC Dem. Party Fed.	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	NC Dem. Party Fed.	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	NC Dem. Party Fed.	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	NY St. Dem. Party	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	NY St. Dem. Party	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	NY St. Dem. Party	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	NY St. Dem. Party	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of Oregon	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of Oregon	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of Oregon	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of Oregon	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of South Carolina	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of South Carolina	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of South Carolina	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Democratic Party of South Carolina	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$207,278.19	to Affiliate	Democratic Party of Wisconsin	Kentucky Victory Fund	1/4/2016	\$207,278.19	to Affiliate	Democratic Party of Wisconsin	Kentucky Victory Fund	1/4/2016	\$207,278.19	to Affiliate	Democratic Party of Wisconsin	Kentucky Victory Fund	1/4/2016	\$207,278.19	to Affiliate	Democratic Party of Wisconsin	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Ohio Democratic Affiliate	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Ohio Democratic Affiliate	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Ohio Democratic Affiliate	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Ohio Democratic Affiliate	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$140,000.00	to Affiliate	Oklahoma Democratic Party	Kentucky Victory Fund	1/4/2016	\$140,000.00	to Affiliate	Oklahoma Democratic Party	Kentucky Victory Fund	1/4/2016	\$140,000.00	to Affiliate	Oklahoma Democratic Party	Kentucky Victory Fund	1/4/2016	\$140,000.00	to Affiliate	Oklahoma Democratic Party	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Tennessee Democratic Party	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Tennessee Democratic Party	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Tennessee Democratic Party	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Tennessee Democratic Party	Kentucky Victory Fund
Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Utah Democratic Party	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Utah Democratic Party	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Utah Democratic Party	Kentucky Victory Fund	1/4/2016	\$80,000.00	to Affiliate	Utah Democratic Party	Kentucky Victory Fund

65. HVF reported transferring \$73,000 to the Kentucky State Democratic Central Executive Committee, also on January 4, 2016. See Exhibit 1, Row 85. The Kentucky State Democratic Central Executive Committee did not report receiving any funds from HVF on or about this date. *Id.* It nevertheless reported transferring \$73,000 to the DNC that day, and the DNC reported receiving \$73,000 from the Kentucky State Democratic Central Executive Committee that same day. *Id.* Through these transactions, a total of \$73,000 was transferred from HVF, purportedly through the Kentucky State Democratic Central Executive Committee, to the DNC on January 4, 2016. It is reasonably possible HVF never actually transferred funds to the Kentucky

State Democratic Central Executive Committee or any other state parties on or about January 4, 2016, but rather transferred those funds directly to the DNC, and/or the Kentucky State Democratic Central Executive Committee had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

1/4/2016	\$71,000.00 to Affiliate	Transfer from	1/4/2016	\$71,000.00 to DNC	Transfer from	1/4/2016	\$71,000.00 to	Transfer from
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66. **April 2016**—HVF reported transferring a total of \$707,000 to four of its member state party committees on April 25, 2016. *See* Exhibit 1, Rows 87-90. The amount of each individual transfer was between \$176,000 and \$179,000. *Id.* Each of those four state party committees reported receiving a transfer from HVF that same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of those four state party committees also reported transferring precisely the same amount of funds to the DNC on the same day. *Id.* The DNC reported receiving transfers from all those committees on the same day (April 25, 2016), with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$707,000 was transferred from HVF, through four state party committees, to the DNC on April 25, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

1/12/2016	\$300,000.00 to Affiliate	Transfer from	1/12/2016	\$300,000.00 to Affiliate	Transfer from	1/12/2016	\$300,000.00 to DNC	Transfer from
5/12/2016	\$150,000.00 to Affiliate	Transfer from	5/12/2016	\$150,000.00 to Affiliate	Transfer from	5/12/2016	\$150,000.00 to DNC	Transfer from
5/12/2016	\$150,000.00 to Affiliate	Transfer from	5/12/2016	\$150,000.00 to Affiliate	Transfer from	5/12/2016	\$150,000.00 to DNC	Transfer from
5/12/2016	\$300,000.00 to Affiliate	Transfer from	5/12/2016	\$300,000.00 to Affiliate	Transfer from	5/12/2016	\$300,000.00 to DNC	Transfer from

67. **May 2016**—HVF reported transferring a total of \$900,000 to four of its member state party committees on May 12, 2016. *See* Exhibit 1, Rows 92-95. The amount of each

individual transfer was between \$150,000 and \$300,000. *Id.* Each of those four state party committees reported receiving a transfer from HVF, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Oddly, even though HVF claims it transferred the funds to each committee on May 12, the Democratic State Central Committee of Louisiana claims it received its \$300,000 on May 6; the Georgia Federal Election Committee claims it received its \$150,000 on May 11; and the Oklahoma Democratic Party likewise claims it received its \$300,000 on May 11. Each of these four state party committees also reported transferring precisely the same amounts of funds they reported having received to the DNC on dates ranging from May 6 through May 12. *Id.* The DNC nevertheless reported receiving transfers from all those committees on the same day, May 12, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$900,000 was transferred from HVF, through four state party committees, to the DNC on May 12, 2016. It is reasonably possible HVF never actually transferred funds to these four state party committees on or about May 12, 2016, but rather transferred those funds directly to the DNC, and/or these state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

State Party	Date	Amount	From	To	Report ID
Idaho State Democratic Party	5/12/2016	\$100,000.00	HVF	DNC	FEC-1191112 (A4), Page: 18308, Transaction ID: 0220154
Democratic State Central Committee of Louisiana	5/6/2016	\$300,000.00	HVF	DNC	FEC-1079053, Page: 28, Transaction ID: V9310250W7, V9310250V14
Georgia Federal Election Committee	5/11/2016	\$150,000.00	HVF	DNC	FEC-1079053, Page: 82, Transaction ID: V9310250W7, V9310250V14
Oklahoma Democratic Party	5/11/2016	\$300,000.00	HVF	DNC	FEC-1079053, Page: 1376, Transaction ID: C22015729

68. HVF reported transferring \$100,000 to the Idaho State Democratic Party, also on May 12, 2016. *See* Exhibit 1, Row 97. The Idaho State Democratic Party did not report receiving any funds from HVF on or about this date. *Id.* It also did not report transferring any funds to the DNC on or about that date. *Id.* Nevertheless, the DNC reported receiving a transfer of \$100,000

from the Idaho State Democratic Party on May 12, 2016. *Id.* Through these transactions, a total of \$100,000 was transferred from HVF, purportedly through the Idaho State Democratic Party, to the DNC on May 12, 2016. It is reasonably possible HVF never actually transferred funds to the Idaho State Democratic Party or any other state parties on or about May 12, 2016, but rather transferred those funds directly to the DNC. It is also reasonably possible the Idaho State Democratic Party had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Netbr. Vccfy Cmg	5/12/2016	\$100,000.00	to Affiliat Idaho State Party	Transfer from Affiliat	to Affiliat	5/12/2016	\$100,000.00	Reason ID: 10191560, Page: 1770, Transaction ID: C32816190
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69. **Early July 2016**—HVF reported transferring a total of \$5,000,000 to 8 of its member state party committees on July 13, 2016. *See* Exhibit 1, Rows 99-106. The amount of each individual transfer was between \$600,000 and \$740,000. *Id.* Each of those eight state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these eight state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, July 13, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$5,000,000 was transferred from HVF, through 8 state party committees, to the DNC on July 13, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

History Victory Fund	7/11/2016	Transfer	NY St. Dem. Com. of Exec. Cmte.	Transfer from Affiliate	7/11/2016	Transfer		Transfer from Affiliate	7/11/2016	6600,000.00 DNC	6600,000.00 DNC	6600,000.00 DNC	7/11/2016	6600,000.00	Transfer from Affiliate	1. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448 2. Report ID: FEC-1097886 (A-1), Page: 24, Transaction ID: 11-51-00006 00006 3. Report ID: FEC-1097886 (A-1), Page: 24, Transaction ID: 11-51-00006 00006
History Victory Fund	7/11/2016	Transfer	Mass. Dem. % Exec.	Transfer from Affiliate	7/11/2016	Transfer		Transfer from Affiliate	7/11/2016	6600,000.00 DNC	6600,000.00 DNC	6600,000.00 DNC	7/11/2016	6600,000.00	Transfer from Affiliate	4. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: C23977310 5. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448 6. Report ID: FEC-1164575 (A-1), Page: 226, Transaction ID: VP933062023 7. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: VP933062023 8. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448
History Victory Fund	7/11/2016	Transfer	Miss. Dem. Party	Transfer from Affiliate	7/11/2016	Transfer		Transfer from Affiliate	7/11/2016	6600,000.00 DNC	6600,000.00 DNC	6600,000.00 DNC	7/11/2016	6600,000.00	Transfer from Affiliate	9. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: 12-09-00009 00009 10. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448 11. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: 12-09-00009 00009 12. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: 12-09-00009 00009
History Victory Fund	7/11/2016	Transfer	MT Dem. Party	Transfer from Affiliate	7/11/2016	Transfer		Transfer from Affiliate	7/11/2016	6600,000.00 DNC	6600,000.00 DNC	6600,000.00 DNC	7/11/2016	6600,000.00	Transfer from Affiliate	13. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448 14. Report ID: FEC-1097937, Page: 229, Transaction ID: V8071800764 15. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: C23977311 16. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448
History Victory Fund	7/11/2016	Transfer	North Carol. Democrat Commitee	Transfer from Affiliate	7/11/2016	Transfer		Transfer from Affiliate	7/11/2016	6600,000.00 DNC	6600,000.00 DNC	6600,000.00 DNC	7/11/2016	6600,000.00	Transfer from Affiliate	17. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: 0241448 18. Report ID: FEC-1097937, Page: 229, Transaction ID: V8071800764 19. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: C23977311 20. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448
History Victory Fund	7/11/2016	Transfer	Ohio State Democrat Commitee	Transfer from Affiliate	7/11/2016	Transfer		Transfer from Affiliate	7/11/2016	6600,000.00 DNC	6600,000.00 DNC	6600,000.00 DNC	7/11/2016	6600,000.00	Transfer from Affiliate	21. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: 0241448 22. Report ID: FEC-1097937, Page: 229, Transaction ID: V8071800764 23. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: C23977311 24. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448
History Victory Fund	7/11/2016	Transfer	South Carolina Democrat Commitee	Transfer from Affiliate	7/11/2016	Transfer		Transfer from Affiliate	7/11/2016	6600,000.00 DNC	6600,000.00 DNC	6600,000.00 DNC	7/11/2016	6600,000.00	Transfer from Affiliate	25. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: 0241448 26. Report ID: FEC-1097937, Page: 229, Transaction ID: V8071800764 27. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: C23977311 28. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448
History Victory Fund	7/11/2016	Transfer	Texas Democrat Commitee	Transfer from Affiliate	7/11/2016	Transfer		Transfer from Affiliate	7/11/2016	6600,000.00 DNC	6600,000.00 DNC	6600,000.00 DNC	7/11/2016	6600,000.00	Transfer from Affiliate	29. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: 0241448 30. Report ID: FEC-1097937, Page: 229, Transaction ID: V8071800764 31. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: C23977311 32. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448
History Victory Fund	7/11/2016	Transfer	Virginia Democrat Commitee	Transfer from Affiliate	7/11/2016	Transfer		Transfer from Affiliate	7/11/2016	6600,000.00 DNC	6600,000.00 DNC	6600,000.00 DNC	7/11/2016	6600,000.00	Transfer from Affiliate	33. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: 0241448 34. Report ID: FEC-1097937, Page: 229, Transaction ID: V8071800764 35. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: C23977311 36. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448
History Victory Fund	7/11/2016	Transfer	West Virginia Democrat Commitee	Transfer from Affiliate	7/11/2016	Transfer		Transfer from Affiliate	7/11/2016	6600,000.00 DNC	6600,000.00 DNC	6600,000.00 DNC	7/11/2016	6600,000.00	Transfer from Affiliate	37. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: 0241448 38. Report ID: FEC-1097937, Page: 229, Transaction ID: V8071800764 39. Report ID: FEC-1164575 (A-1), Page: 4979, Transaction ID: C23977311 40. Report ID: FEC-1162666 (A-1), Page: 72276, Transaction ID: 0241448

70. Late July 2016—HVF reported transferring a total of \$5,438,000 to 13 of its member state party committees on July 26, 2016. See Exhibit 1, Rows 108-120. The amount of each individual transfer was between \$150,000 and \$800,000. *Id.* Each of those 13 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 13 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, July 26, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$5,438,000 was transferred from HVF, through 13 state party committees, to the DNC on July 26, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

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Entity	Date	Amount	From	To	Date	Amount	From	To	Reference
Victory Fund	7/26/2016	\$460,000.00	GA Fed. Election Comm.	Affiliate	7/26/2016	\$460,000.00	DNC	Affiliate	1. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0143188 2. Report ID: FEC-1098647 (A1), Page: 38, Transaction ID: C1091816 3. Report ID: FEC-1098647 (A1), Page: 228, Transaction ID: 0511820
Victory Fund	7/26/2016	\$475,000.00	Ohio State Dem. Party	Affiliate	7/26/2016	\$475,000.00	DNC	Affiliate	1. Report ID: FEC-1164573 (A1), Page: 3491, Transaction ID: C2977323 2. Report ID: FEC-1164573 (A1), Page: 3492, Transaction ID: 0242167 3. Report ID: FEC-1154634 (A1), Page: 57, Transaction ID: 1997464506 4. Report ID: FEC-1154634 (A1), Page: 218, Transaction ID: 1997464509
Victory Fund	7/26/2016	\$760,000.00	Indiana Dem. Cong. Victory Comm.	Affiliate	7/26/2016	\$760,000.00	DNC	Affiliate	1. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0242168 2. Report ID: FEC-1164573 (A1), Page: 116, Transaction ID: C1291717 3. Report ID: FEC-1164573 (A1), Page: 245, Transaction ID: 0646899 4. Report ID: FEC-1164573 (A1), Page: 3492, Transaction ID: C1297322
Victory Fund	7/26/2016	\$193,000.00	NY St. Dem. Central Exec. Comm.	Affiliate	7/26/2016	\$193,000.00	DNC	Affiliate	1. Report ID: FEC-1097646 (A1), Page: 21, Transaction ID: 14-01-00000-00000 2. Report ID: FEC-1097646 (A1), Page: 54, Transaction ID: 11-54-00007-00007 3. Report ID: FEC-1164573 (A1), Page: 3492, Transaction ID: C1297324
Victory Fund	7/26/2016	\$700,000.00	Mass. Dem. Party	Affiliate	7/26/2016	\$700,000.00	DNC	Affiliate	1. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0242169 2. Report ID: FEC-1164573 (A1), Page: 219, Transaction ID: 1997464511 3. Report ID: FEC-1164573 (A1), Page: 3492, Transaction ID: C1297324 4. Report ID: FEC-1182866 (A1), Page: 7252, Transaction ID: 0242169 5. Report ID: FEC-1182866 (A1), Page: 189, Transaction ID: 17-09-00017-00017 6. Report ID: FEC-1182866 (A1), Page: 143, Transaction ID: 17-08-00018-00018
Victory Fund	7/26/2016	\$200,000.00	MD Dem. State Party	Affiliate	7/26/2016	\$200,000.00	DNC	Affiliate	1. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0242170 2. Report ID: FEC-1164573 (A1), Page: 182, Transaction ID: 11-54-00011-00011 3. Report ID: FEC-1164573 (A1), Page: 202, Transaction ID: 17-54-00011-00011 4. Report ID: FEC-1164573 (A1), Page: 3492, Transaction ID: C1297325
Victory Fund	7/26/2016	\$200,000.00	NY Dem. Party	Affiliate	7/26/2016	\$200,000.00	DNC	Affiliate	1. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0242171 2. Report ID: FEC-1164573 (A1), Page: 227, Transaction ID: 1997464513 3. Report ID: FEC-1164573 (A1), Page: 3492, Transaction ID: C1297325 4. Report ID: FEC-1182866 (A1), Page: 7258, Transaction ID: 0242171
Victory Fund	7/26/2016	\$450,000.00	Democratic Party of South Carolina	Affiliate	7/26/2016	\$450,000.00	DNC	Affiliate	1. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0242172 2. Report ID: FEC-1164573 (A1), Page: 162, Transaction ID: 17-25-00040-00040 3. Report ID: FEC-1164573 (A1), Page: 3492, Transaction ID: C1297326 4. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0242172
Victory Fund	7/26/2016	\$450,000.00	Ohio Dem. Party	Affiliate	7/26/2016	\$450,000.00	DNC	Affiliate	1. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0242173 2. Report ID: FEC-1164573 (A1), Page: 150, Transaction ID: 1997464515 3. Report ID: FEC-1164573 (A1), Page: 3492, Transaction ID: C1297326 4. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0242173
Victory Fund	7/26/2016	\$600,000.00	Democratic Party NY State	Affiliate	7/26/2016	\$600,000.00	DNC	Affiliate	1. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0242174 2. Report ID: FEC-1164573 (A1), Page: 111, Transaction ID: 11-54-00009-00009 3. Report ID: FEC-1164573 (A1), Page: 216, Transaction ID: 17-24-00010-00010 4. Report ID: FEC-1164573 (A1), Page: 3492, Transaction ID: C1297327
Victory Fund	7/26/2016	\$300,000.00	Democratic Party	Affiliate	7/26/2016	\$300,000.00	DNC	Affiliate	1. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0242175 2. Report ID: FEC-1164573 (A1), Page: 22, Transaction ID: 17-24-00010-00010 3. Report ID: FEC-1182866 (A1), Page: 7264, Transaction ID: C1297327 4. Report ID: FEC-1182866 (A1), Page: 192, Transaction ID: 1997464517 5. Report ID: FEC-1182866 (A1), Page: 186, Transaction ID: 1997464519
Victory Fund	7/26/2016	\$150,000.00	Democratic Party	Affiliate	7/26/2016	\$150,000.00	DNC	Affiliate	1. Report ID: FEC-1182866 (A1), Page: 7276, Transaction ID: 0242176 2. Report ID: FEC-1164573 (A1), Page: 3492, Transaction ID: C1297328

71. Early August 2016—HVF reported transferring a total of \$4,795,000 to 17 of its member state party committees on August 11, 2016. See Exhibit 1, Rows 122-138. The amount of each individual transfer was between \$100,000 and \$875,000. *Id.* Each of those 17 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 17 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, August 11, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$4,795,000 was transferred from HVF, through 17 state party committees, to the DNC on August 11, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

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Party	Date	Amount	To/From	Party	Date	Amount	To/From	Party	Date	Amount	To/From
HVF	8/11/2016	\$370,000.00	to Affilate	Dem. St. Central Com. LA	8/11/2016	\$370,000.00	from Affilate	HVF	8/11/2016	\$370,000.00	to DNC
HVF	8/11/2016	\$100,000.00	to Affilate	GA Fed. Election Com.	8/11/2016	\$100,000.00	from Affilate	HVF	8/11/2016	\$100,000.00	to DNC
HVF	8/11/2016	\$150,000.00	to Affilate	NY St. Dem. Central Com. Cotic.	8/11/2016	\$150,000.00	from Affilate	HVF	8/11/2016	\$150,000.00	to DNC
HVF	8/11/2016	\$150,000.00	to Affilate	Mass. Dem. St. Com.	8/11/2016	\$150,000.00	from Affilate	HVF	8/11/2016	\$150,000.00	to DNC
HVF	8/11/2016	\$150,000.00	to Affilate	N.H. Dem. Party	8/11/2016	\$150,000.00	from Affilate	HVF	8/11/2016	\$150,000.00	to DNC
HVF	8/11/2016	\$150,000.00	to Affilate	MD Dem. St. Com.	8/11/2016	\$150,000.00	from Affilate	HVF	8/11/2016	\$150,000.00	to DNC
HVF	8/11/2016	\$150,000.00	to Affilate	MT Dem. Party	8/11/2016	\$150,000.00	from Affilate	HVF	8/11/2016	\$150,000.00	to DNC
HVF	8/11/2016	\$250,000.00	to Affilate	Democrat. Party of New Mexico	8/11/2016	\$250,000.00	from Affilate	HVF	8/11/2016	\$250,000.00	to DNC
HVF	8/11/2016	\$475,000.00	to Affilate	Democratic Party of Oregon	8/11/2016	\$475,000.00	from Affilate	HVF	8/11/2016	\$475,000.00	to DNC
HVF	8/11/2016	\$200,000.00	to Affilate	Democratic State Committee (Polisemen) New Jersey	8/11/2016	\$200,000.00	from Affilate	HVF	8/11/2016	\$200,000.00	to DNC
HVF	8/11/2016	\$250,000.00	to Affilate	Mass. Connector Roads Board	8/11/2016	\$250,000.00	from Affilate	HVF	8/11/2016	\$250,000.00	to DNC
HVF	8/11/2016	\$450,000.00	to Affilate	Director of State Comptroller	8/11/2016	\$450,000.00	from Affilate	HVF	8/11/2016	\$450,000.00	to DNC
HVF	8/11/2016	\$250,000.00	to Affilate	South Dakota Democratic Party	8/11/2016	\$250,000.00	from Affilate	HVF	8/11/2016	\$250,000.00	to DNC
HVF	8/11/2016	\$800,000.00	to Affilate	Idaho Democratic Party	8/11/2016	\$800,000.00	from Affilate	HVF	8/11/2016	\$800,000.00	to DNC
HVF	8/11/2016	\$200,000.00	to Affilate	Utah State Democratic Committee WV State	8/11/2016	\$200,000.00	from Affilate	HVF	8/11/2016	\$200,000.00	to DNC
HVF	8/11/2016	\$150,000.00	to Affilate	Democratic Executive Committee WV	8/11/2016	\$150,000.00	from Affilate	HVF	8/11/2016	\$150,000.00	to DNC
HVF	8/11/2016	\$150,000.00	to Affilate	Democratic State Central Copyrigton	8/11/2016	\$150,000.00	from Affilate	HVF	8/11/2016	\$150,000.00	to DNC

72. HVF also reported transferring \$700,000 to the Democratic Party of Arkansas on August 13, 2016. See Exhibit 1, Row 140. The Democratic Party of Arkansas reported receiving those funds on August 11, 2016, however. *Id.* It also reported transferring \$700,000 to the DNC on August 11, 2016, and the DNC reported receiving those funds the same day. *Id.* Through these transactions, a total of \$700,000 was transferred from HVF, purportedly through the Democratic Party of Arkansas, to the DNC on August 13, 2016. It is reasonably possible HVF never actually transferred funds to the Democratic Party of Arkansas or any other state parties on or about August 11 or 13, 2016, but rather transferred those funds directly to the DNC, and/or the Democratic Party or Arkansas had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Party	Transfer	Date	Amount	From	To	Transaction ID
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178562
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178563
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178564
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178565
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178566
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178567
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178568
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178569
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178570
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178571
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178572
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178573
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178574
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178575
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178576
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178577
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178578
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178579
Democrat	Transfer	8/11/2016	\$700,000.00	HVF	DNC	178580

73. **Late August 2016**—HVF reported transferring a total of \$5,500,000 to 16 of its member state party committees on August 26, 2016. *See* Exhibit 1, Rows 142-157. The amount of each individual transfer was between \$300,000 and \$600,000. *Id.* Each of those 16 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 16 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, August 26, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$5,500,000 was transferred from HVF, through 16 state party committees, to the DNC on August 26, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.



possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Entity	Date	Amount	From	To	Entity	Date	Amount	From	To
WV State Democratic Fund	9/12/2016	\$100,000.00	Transfer from Affiliates	Alabama Democratic Party	9/12/2016	\$100,000.00	Transfer from Affiliates	DNC	
WV State Democratic Fund	9/12/2016	\$350,000.00	Transfer from Affiliates	Miss. Dem. Party	9/12/2016	\$350,000.00	Transfer from Affiliates	DNC	
WV State Democratic Fund	9/12/2016	\$400,000.00	Transfer from Affiliates	Democratic Party of New Mexico	9/12/2016	\$400,000.00	Transfer from Affiliates	DNC	
WV State Democratic Fund	9/12/2016	\$150,000.00	Transfer from Affiliates	Democratic Party of Oregon	9/12/2016	\$150,000.00	Transfer from Affiliates	DNC	
WV State Democratic Fund	9/12/2016	\$350,000.00	Transfer from Affiliates	Random Island Democrats State Committee	9/12/2016	\$350,000.00	Transfer from Affiliates	DNC	
WV State Democratic Fund	9/12/2016	\$400,000.00	Transfer from Affiliates	South Dakota Democratic Party	9/12/2016	\$400,000.00	Transfer from Affiliates	DNC	
WV State Democratic Fund	9/12/2016	\$700,000.00	Transfer from Affiliates	Iowa Democratic Party	9/12/2016	\$700,000.00	Transfer from Affiliates	DNC	
WV State Democratic Fund	9/12/2016	\$350,000.00	Transfer from Affiliates	Utah State Committee	9/12/2016	\$350,000.00	Transfer from Affiliates	DNC	

75. HVF reported transferring \$350,000 to the WV State Democratic Executive Committee, also on September 12, 2016. *See* Exhibit 1, Row 168. The WV State Democratic Executive Committee did not report receiving any funds from HVF on or about this date. *Id.* It also did not report transferring any funds to the DNC on or about that date. *Id.* Nevertheless, the DNC reported receiving a transfer of \$350,000 from the WV State Democratic Executive Committee on September 12, 2016. *Id.* Through this transaction, \$350,000 was transferred from HVF, purportedly through the WV State Democratic Executive Committee, to the DNC on September 12, 2016. It is reasonably possible HVF never actually transferred funds to the WV State Democratic Executive Committee or any other state parties on or about September 12, 2016, but rather transferred those funds directly to the DNC, and/or the WV State Democratic Executive Committee had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Entity	Date	Amount	From	To
WV State Democratic Fund	9/12/2016	\$350,000.00	Transfer from WV State Democratic Executive Committee	DNC

76. **Late September 2016**—HVF reported transferring a total of \$2,850,000 to 7 of its member state party committees on September 26, 2016. *See* Exhibit 1, Rows 170-176. The amount

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of each individual transfer was between \$300,000 and \$1,000,000. *Id.* Each of those 7 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 7 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, September 26, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$2,850,000 was transferred from HVF, through 7 state party committees, to the DNC on September 26, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Victory Fund	Date	Amount	To	From	Date	Amount	To	From
Victory Fund	9/26/2016	\$1,000,000.00	to Affiliates	State Dem. Party	9/26/2016	\$1,000,000.00	to Affiliates	DNC
Victory Fund	9/26/2016	\$350,000.00	to Affiliates	News, Dem. Party	9/26/2016	\$350,000.00	to Affiliates	DNC
Victory Fund	9/26/2016	\$350,000.00	to Affiliates	Democratic Party of New Mexico	9/26/2016	\$350,000.00	to Affiliates	DNC
Victory Fund	9/26/2016	\$300,000.00	to Affiliates	Democratic Party of Oregon	9/26/2016	\$300,000.00	to Affiliates	DNC
Victory Fund	9/26/2016	\$300,000.00	to Affiliates	Democratic State Committee Rhode Island	9/26/2016	\$300,000.00	to Affiliates	DNC
Victory Fund	9/26/2016	\$350,000.00	to Affiliates	Democratic South Dakota Party	9/26/2016	\$350,000.00	to Affiliates	DNC
Victory Fund	9/26/2016	\$300,000.00	to Affiliates	Utah State Democratic Party	9/26/2016	\$300,000.00	to Affiliates	DNC
Victory Fund	9/26/2016	\$300,000.00	to Affiliates	Utah State Democratic Party	9/26/2016	\$300,000.00	to Affiliates	DNC

77. HVF reported transferring \$300,000 to the Mississippi Democratic Party, also on September 26, 2016. *See* Exhibit 1, Row 177. The Mississippi Democratic Party reported receiving \$350,000 from HVF on that date, however. *Id.* It also reported transferring \$350,000 to the DNC on that date. *Id.* The DNC however, reported receiving a transfer of \$300,000 from the Mississippi Democratic Party on September 26, 2016. *Id.* Through this transaction, at least \$300,000 was transferred from HVF, purportedly through the Mississippi Democratic Party, to the DNC on September 26, 2016. It is reasonably possible HVF never actually transferred funds to the

Mississippi Democratic Party or any other state parties on or about September 26, 2016, but rather transferred those funds directly to the DNC, and/or the Mississippi Democratic Party had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

State	Date	Transfer From	Transfer To	Amount	Report ID	Page	Transaction ID
Mississippi	9/26/2016	Transfer from HVF	Transfer to Affiliates	\$320,000.00	FEC-1182666 (A1)	Page 7754	Transaction ID: 0304530
Mississippi	9/26/2016	Transfer from HVF	Transfer to Affiliates	\$150,000.00	FEC-1182666 (A1)	Page 7754	Transaction ID: 0304530
Mississippi	9/26/2016	Transfer from HVF	Transfer to Affiliates	\$150,000.00	FEC-1182666 (A1)	Page 7754	Transaction ID: 0304530
Mississippi	9/26/2016	Transfer from HVF	Transfer to Affiliates	\$300,000.00	FEC-1182666 (A1)	Page 7754	Transaction ID: 0304530

78. **October 6, 2016**—HVF reported transferring a total of \$2,750,000 to 7 of its member state party committees on October 6, 2016. *See* Exhibit 1, Rows 179-185. The amount of each individual transfer was between \$100,000 and \$1,200,000. *Id.* Each of those 7 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 7 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, October 6, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$2,750,000 was transferred from HVF, through 7 state party committees, to the DNC on October 6, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

State	Date	Transfer From	Transfer To	Amount	Report ID	Page	Transaction ID
Mississippi	10/6/2016	Transfer from HVF	Transfer to Affiliates	\$1,200,000.00	FEC-1182666 (A1)	Page 7754	Transaction ID: 0304530
Mississippi	10/6/2016	Transfer from HVF	Transfer to Affiliates	\$100,000.00	FEC-1182666 (A1)	Page 7754	Transaction ID: 0304530
Mississippi	10/6/2016	Transfer from HVF	Transfer to Affiliates	\$900,000.00	FEC-1182666 (A1)	Page 7754	Transaction ID: 0304530
Mississippi	10/6/2016	Transfer from HVF	Transfer to Affiliates	\$150,000.00	FEC-1182666 (A1)	Page 7754	Transaction ID: 0304530
Mississippi	10/6/2016	Transfer from HVF	Transfer to Affiliates	\$100,000.00	FEC-1182666 (A1)	Page 7754	Transaction ID: 0304530
Mississippi	10/6/2016	Transfer from HVF	Transfer to Affiliates	\$150,000.00	FEC-1182666 (A1)	Page 7754	Transaction ID: 0304530
Mississippi	10/6/2016	Transfer from HVF	Transfer to Affiliates	\$150,000.00	FEC-1182666 (A1)	Page 7754	Transaction ID: 0304530

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79. HVF reported transferring \$900,000 to the Kansas Democratic Party, also on October 6, 2016. *See* Exhibit 1, Row 187. The Kansas Democratic Party did not report receiving any funds from HVF on or about this date. *Id.* It also did not report transferring any funds to the DNC on or about that date. *Id.* Nevertheless, the DNC reported receiving a transfer of \$900,000 from the Kansas Democratic Party on October 6, 2016. *Id.* Through this transaction, \$900,000 was transferred from HVF, purportedly through the Kansas Democratic Party, to the DNC on October 6, 2016. It is reasonably possible HVF never actually transferred funds to the Kansas Democratic Party or any other state parties on or about October 6, 2016, but rather transferred those funds directly to the DNC, and/or the Kansas Democratic Party had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

10/6/2016	900,000.00	to Kansas Democratic Party	Transfer from HVF	10/6/2016	900,000.00	to DNC	Transfer from Kansas Democratic Party	10/6/2016	900,000.00	to DNC	Transfer from Kansas Democratic Party
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1. Report ID: FEC-1188853 (A), Page: 21944, Transaction ID: 0109903  
 2. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported  
 3. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported  
 4. Report ID: FEC-1164580 (A), Page: 1114, Transaction ID: CA1003315

80. **October 7, 2016**—HVF reported transferring \$550,000 to the Texas Democratic Party on October 7, 2016. *See* Exhibit 1, Rows 189. The Texas Democratic Party reported receiving a transfer of \$550,000 from HVF on the same day. *Id.* The Texas Democratic Party also reported transferring \$550,000 to the DNC that same day. *Id.* The DNC reported receiving \$550,000 from the Texas Democratic Party on the same day, October 7, 2016. *Id.* Through these transactions, \$550,000 was transferred from HVF, through the Texas Democratic Party, to the DNC on October 6, 2016. It is reasonably possible the Texas Democratic Party had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

10/7/2016	550,000.00	to Texas Democratic Party	Transfer from HVF	10/7/2016	550,000.00	to DNC	Transfer from Texas Democratic Party	10/7/2016	550,000.00	to DNC	Transfer from Texas Democratic Party
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1. Report ID: FEC-1188853 (A), Page: 21970, Transaction ID: 0109903  
 2. Report ID: FEC-1164449 (A), Page: 218, Transaction ID: 11-05-00009-00000  
 3. Report ID: FEC-1188849 (A), Page: 227, Transaction ID: 22-00-00010 00010  
 4. Report ID: FEC-1164580 (A), Page: 1116, Transaction ID: CA1003315

81. **October 11, 2016**—HVF reported transferring a total of \$8,400,000 to 11 of its member state party committees on October 11, 2016. See Exhibit 1, Rows 191-201. The amount of each individual transfer was between \$250,000 and \$1,200,000. *Id.* Each of those 11 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 11 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, October 11, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$8,400,000 was transferred from HVF, through 11 state party committees, to the DNC on October 11, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Transfer From	Transfer To	Amount	Date	Transfer From	Transfer To	Amount	Date
Indiana Victory Fund	Indiana Dem. Conf., Victory	\$400,000.00	10/11/2016	Indiana Dem. Conf., Victory	DNC	\$400,000.00	10/11/2016
Indiana Victory Fund	Malice Bush Party	\$1,200,000.00	10/11/2016	Malice Bush Party	DNC	\$1,200,000.00	10/11/2016
Indiana Victory Fund	Mich. Dem. M. Com.	\$1,025,000.00	10/11/2016	Mich. Dem. M. Com.	DNC	\$1,025,000.00	10/11/2016
Indiana Victory Fund	Miss. Dem. Party	\$400,000.00	10/11/2016	Miss. Dem. Party	DNC	\$400,000.00	10/11/2016
Indiana Victory Fund	MO Dem. St. Affiliates	\$1,050,000.00	10/11/2016	MO Dem. St. Affiliates	DNC	\$1,050,000.00	10/11/2016
Indiana Victory Fund	MI Dem. Party	\$1,050,000.00	10/11/2016	MI Dem. Party	DNC	\$1,050,000.00	10/11/2016
Indiana Victory Fund	Democratic Party of Oregon	\$375,000.00	10/11/2016	Democratic Party of Oregon	DNC	\$375,000.00	10/11/2016
Indiana Victory Fund	Democratic Party of South Carolina	\$600,000.00	10/11/2016	Democratic Party of South Carolina	DNC	\$600,000.00	10/11/2016
Indiana Victory Fund	OH/Nebraska Democratic Party	\$1,000,000.00	10/11/2016	OH/Nebraska Democratic Party	DNC	\$1,000,000.00	10/11/2016
Indiana Victory Fund	Democratic State Committee ILL	\$350,000.00	10/11/2016	Democratic State Committee ILL	DNC	\$350,000.00	10/11/2016
Indiana Victory Fund	State Central Committee	\$1,050,000.00	10/11/2016	State Central Committee	DNC	\$1,050,000.00	10/11/2016

82. **October 18, 2016**—HVF reported transferring a total of \$4,000,000 to 3 of its member state party committees on October 18, 2016. See Exhibit 1, Rows 203-205. The amount of each individual transfer was between \$600,000 and \$2,100,000. *Id.* Each of those 3 state party

committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 3 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, October 18, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$4,000,000 was transferred from HVF, through 3 state party committees, to the DNC on October 18, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

83. HVF reported transferring \$275,000 to the Kentucky State Democratic Central Executive Committee, also on October 18, 2016. *See* Exhibit 1, Row 207. The Kentucky State Democratic Central Executive Committee did not report receiving any funds from HVF on or about this date. *Id.* It reported transferring \$275,000 to the DNC on that date, however, and the DNC reported receiving a transfer of \$275,000 from the Kentucky State Democratic Central Executive Committee the same day, October 18, 2016, as well. *Id.* Through this transaction, \$275,000 was transferred from HVF, purportedly through the Kentucky State Democratic Central Executive Committee, to the DNC on October 18, 2016. It is reasonably possible HVF never actually transferred funds to the Kentucky State Democratic Central Executive Committee or any other state parties on or about October 18, 2016, but rather transferred those funds directly to the DNC, and/or the Kentucky State Democratic Central Executive Committee had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

From	To	Amount	Date	Party
HVF	Kentucky State Democratic Central Executive Committee	\$275,000.00	10/18/2016	Dem

From	To	Amount	Date	Party
Kentucky State Democratic Central Executive Committee	DNC	\$275,000.00	10/18/2016	Dem

1. Report ID: FEC-2016-10-18-1, Page: 21981, Transaction ID: 0021397  
 2. Report ID: 0021397, Page: 14, Transaction ID: 0021397  
 3. Report ID: FEC-2016-10-18-1, Page: 21981, Transaction ID: 0021397

84. **October 20, 2016**—HVF reported transferring a total of \$8,345,000 to 21 of its member state party committees on October 20, 2016. *See* Exhibit 1, Rows 209-229. The amount of each individual transfer was between \$75,000 and \$1,300,000. *Id.* Each of those 21 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 21 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, October 20, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$8,345,000 was transferred from HVF, through 21 state party committees, to the DNC on October 20, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.



2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$1,018,000 was transferred from HVF, through 4 state party committees, to the DNC on October 24, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Victory Fund	10/24/2016	\$100,000.00	Transfer to Affiliate Party	Alaska Democratic Party	Transfer from Affiliate	10/24/2016	\$100,000.00	Transfer to Affiliate	10/24/2016	\$100,000.00	DNC	Transfer from Affiliate	10/24/2016	\$100,000.00	1. Report ID: FEC-1180211 (A1), Page: 21479, Transaction ID: D327870 2. Report ID: FEC-1152211 (A1), Page: 207, Transaction ID: V902527870 3. Report ID: FEC-1152211 (A2), Page: 536, Transaction ID: V0231480294 4. Report ID: FEC-1154593 (A1), Page: 7074, Transaction ID: C33302283
Victory Fund	10/24/2016	\$400,000.00	Transfer to Affiliate	Utah State Democratic Party	Transfer from Affiliate	10/24/2016	\$400,000.00	Transfer to Affiliate	10/24/2016	\$400,000.00	DNC	Transfer from Affiliate	10/24/2016	\$400,000.00	1. Report ID: FEC-1180211 (A1), Page: 21479, Transaction ID: D327870 2. Report ID: FEC-1152211 (A1), Page: 207, Transaction ID: V902527870 3. Report ID: FEC-1152211 (A2), Page: 536, Transaction ID: V0231480294 4. Report ID: FEC-1154593 (A1), Page: 7074, Transaction ID: C33302283 5. Report ID: FEC-1154593 (A2), Page: 558, Transaction ID: V914445323 6. Report ID: FEC-1154593 (A3), Page: 676, Transaction ID: V914445323 7. Report ID: FEC-1164593 (A1), Page: 7042, Transaction ID: C33302283 8. Report ID: FEC-1180211 (A1), Page: 2740, Transaction ID: D327870 9. Report ID: FEC-1154593 (A1), Page: 513, Transaction ID: 1154593-00017 10. Report ID: FEC-1154593 (A1), Page: 500, Transaction ID: 1154593-00017 11. Report ID: FEC-1180211 (A1), Page: 7054, Transaction ID: C33302283 12. Report ID: FEC-1180211 (A1), Page: 27126, Transaction ID: C33302283 13. Report ID: FEC-1180211 (A1), Page: 675, Transaction ID: 1180211-00011 14. Report ID: FEC-1154593 (A1), Page: 671, Transaction ID: 1154593-00017
Victory Fund	10/24/2016	\$118,000.00	Transfer to Affiliate	NY St. Dem. Central Exec. Comm.	Transfer from Affiliate	10/24/2016	\$118,000.00	Transfer to Affiliate	10/24/2016	\$118,000.00	DNC	Transfer from Affiliate	10/24/2016	\$118,000.00	1. Report ID: FEC-1180211 (A1), Page: 2740, Transaction ID: D327870 2. Report ID: FEC-1154593 (A1), Page: 513, Transaction ID: 1154593-00017 3. Report ID: FEC-1154593 (A1), Page: 500, Transaction ID: 1154593-00017 4. Report ID: FEC-1180211 (A1), Page: 7054, Transaction ID: C33302283 5. Report ID: FEC-1180211 (A1), Page: 27126, Transaction ID: C33302283 6. Report ID: FEC-1180211 (A1), Page: 675, Transaction ID: 1180211-00011 7. Report ID: FEC-1154593 (A1), Page: 671, Transaction ID: 1154593-00017
Victory Fund	10/24/2016	\$400,000.00	Transfer to Affiliate	Trans Democratic Party	Transfer from Affiliate	10/24/2016	\$400,000.00	Transfer to Affiliate	10/24/2016	\$400,000.00	DNC	Transfer from Affiliate	10/24/2016	\$400,000.00	1. Report ID: FEC-1180211 (A1), Page: 2740, Transaction ID: D327870 2. Report ID: FEC-1154593 (A1), Page: 513, Transaction ID: 1154593-00017 3. Report ID: FEC-1154593 (A1), Page: 500, Transaction ID: 1154593-00017 4. Report ID: FEC-1180211 (A1), Page: 7054, Transaction ID: C33302283 5. Report ID: FEC-1180211 (A1), Page: 27126, Transaction ID: C33302283 6. Report ID: FEC-1180211 (A1), Page: 675, Transaction ID: 1180211-00011 7. Report ID: FEC-1154593 (A1), Page: 671, Transaction ID: 1154593-00017

86. HVF reported transferring a total of \$1,225,000 to two of its other member state party committees, also on October 24, 2016, including \$400,000 to the Democratic State Central Committee of LA, and \$825,000 to the Democratic Party of Arkansas. *See Exhibit 1, Rows 236-37.* Neither of those entities reported receiving any transfers from the HVF on or about that day, however. *Id.* The Democratic Party of Arkansas did not report transferring any funds to the DNC on or about that day, either; the Democratic State Central Committee of LA reported transferring \$400,000 to the DNC that day. *Id.* The DNC reported receiving contributions of \$400,000 from the Democratic State Central Committee of LA and \$825,000 from the Democratic Party of Arkansas on October 24, 2016. *Id.* Through these transactions, a total of \$1,225,000 was transferred from HVF, purportedly through two additional state party committees, to the DNC on or about October 24, 2016. It is reasonably possible HVF never actually transferred funds to these or any other state parties on or about October 24, 2016, but rather transferred those funds directly to the DNC, and/or these state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

<table border="1"> <tr><td>to</td><td>10/24/2016</td><td>\$400,000.00</td><td>to</td><td>AlBate</td></tr> <tr><td>from</td><td>10/24/2016</td><td>\$400,000.00</td><td>from</td><td>AlBate</td></tr> </table>	to	10/24/2016	\$400,000.00	to	AlBate	from	10/24/2016	\$400,000.00	from	AlBate	<table border="1"> <tr><td>to</td><td>10/24/2016</td><td>\$400,000.00</td><td>to</td><td>DNC</td></tr> <tr><td>from</td><td>10/24/2016</td><td>\$400,000.00</td><td>from</td><td>DNC</td></tr> </table>	to	10/24/2016	\$400,000.00	to	DNC	from	10/24/2016	\$400,000.00	from	DNC	<table border="1"> <tr><td>to</td><td>10/24/2016</td><td>\$400,000.00</td><td>to</td><td>AlBate</td></tr> <tr><td>from</td><td>10/24/2016</td><td>\$400,000.00</td><td>from</td><td>AlBate</td></tr> </table>	to	10/24/2016	\$400,000.00	to	AlBate	from	10/24/2016	\$400,000.00	from	AlBate
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from	10/24/2016	\$400,000.00	from	AlBate																												

87. **October 26, 2016**—HVF reported transferring a total of \$7,115,000 to 27 of its member state party committees on October 26, 2016. *See* Exhibit 1, Rows 239-265. The amount of each individual transfer was between \$20,000 and \$1,100,000. *Id.* Each of those 27 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 27 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, October 26, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$7,115,000 was transferred from HVF, through 27 state party committees, to the DNC on October 26, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

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Date	From	To	Amount	Transaction ID
10/26/2016	Major Democratic Party	Transfer from Affiliates	\$100,000.00	1. Report ID: FEC-1180561 (A1), Page: 2749, Transaction ID: 0329221 2. Report ID: FEC-115211 (A1), Page: 155, Transaction ID: 0002020952 3. Report ID: FEC-115211 (A1), Page: 516, Transaction ID: 0002100010
10/26/2016	Colorado Democratic Party	Transfer from Affiliates	\$500,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	GA Fed. Election Comm.	Transfer from Affiliates	\$170,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Indiana Dem. Cong. Victory Fund	Transfer from Affiliates	\$75,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Ill. St. Dem. Central Exec. Com.	Transfer from Affiliates	\$120,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Maine Dem. Party	Transfer from Affiliates	\$175,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Miss. Dem. Cong. Victory Fund	Transfer from Affiliates	\$225,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	MO Dem. Cent.	Transfer from Affiliates	\$425,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Ark. Dem. Party	Transfer from Affiliates	\$30,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	NH Dem. Party	Transfer from Affiliates	\$1,100,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Democratic Party of New Mexico	Transfer from Affiliates	\$230,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Democratic Party of Oregon	Transfer from Affiliates	\$215,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Democratic Party of South Carolina	Transfer from Affiliates	\$210,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Democratic Party of Wisconsin	Transfer from Affiliates	\$200,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Wisconsin Democratic State Committee (Downtown)	Transfer from Affiliates	\$275,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	New Jersey Democratic Party	Transfer from Affiliates	\$330,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	New Jersey Democratic State Committee	Transfer from Affiliates	\$240,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Ohio Democratic Party	Transfer from Affiliates	\$215,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Rhode Island Democratic State Committee	Transfer from Affiliates	\$270,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	South Dakota Democratic Party	Transfer from Affiliates	\$230,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Tennessee Democratic Party	Transfer from Affiliates	\$210,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	Utah State Democratic Party	Transfer from Affiliates	\$220,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206
10/26/2016	NY State Democratic Executive Committee	Transfer from Affiliates	\$160,000.00	1. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 2. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206 3. Report ID: FEC-1164993 (A1), Page: 7094, Transaction ID: C31306206

88. HVF reported transferring \$125,000 to the Democratic Party of Arkansas, also on October 26, 2016. See Exhibit 1, Row 267. The Democratic Party of Arkansas did not report receiving any funds from HVF on or about that date. *Id.* It likewise did not report transferring any

funds to the DNC on or about that date, either. *Id.* The DNC reported receiving a transfer of \$125,000 from the Democratic Party of Arkansas the same day, October 26, 2016, as well. *Id.* Through this transaction, \$125,000 was transferred from HVF, purportedly through the Democratic Party of Arkansas, to the DNC on October 26, 2016. It is reasonably possible HVF never actually transferred funds to the Democratic Party of Arkansas or any other state parties on or about October 18, 2016, but rather transferred those funds directly to the DNC, and/or the Democratic Party of Arkansas had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Date: 10/26/2016 Amount: \$125,000.00 From: HVF To: DNC	Date: 10/26/2016 Amount: \$125,000.00 From: HVF To: DNC	Date: 10/26/2016 Amount: \$125,000.00 From: HVF To: DNC	Date: 10/26/2016 Amount: \$125,000.00 From: HVF To: DNC	Date: 10/26/2016 Amount: \$125,000.00 From: HVF To: DNC	Date: 10/26/2016 Amount: \$125,000.00 From: HVF To: DNC
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89. **October 27, 2016**—HVF reported transferring a total of \$2,075,000 to 22 of its member state party committees on October 26, 2016. *See* Exhibit 1, Rows 269-290. The amount of each individual transfer was between \$20,000 and \$900,000. *Id.* Each of those 22 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 22 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, October 27, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$2,075,000 was transferred from HVF, through 22 state party committees, to the DNC on October 27, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.



Party of Arkansas, to the DNC on October 27, 2016. It is reasonably possible HVF never actually transferred funds to the Democratic Party of Arkansas or any other state parties on or about October 27, 2016, but rather transferred those funds directly to the DNC, and/or the Democratic Party of Arkansas had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Party	Transfer	Amount	Date
10/27/2016	\$15,000.00 to Arkansas		
10/27/2016	\$15,000.00		

91. **October 31, 2016**—HVF reported transferring a total of \$2,862,000 to 28 of its member state party committees on October 31, 2016. *See* Exhibit 1, Rows 294-321. The amount of each individual transfer was between \$32,000 and \$540,000. *Id.* Each of those 28 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 28 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, October 31, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$2,862,000 was transferred from HVF, through 28 state party committees, to the DNC on October 31, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

20161031

Party	Date	From	To	Amount	Source	Destination	Comments
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Michelle Democratic Party	\$48,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$48,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	GA Fed. Election Comm. affiliate	\$32,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$32,000.00 from affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	ND State Dem. Party	\$43,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$43,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Indiana Dem. Cong. Victory Comm.	\$300,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$300,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	NY St. Dem. Central Exec. Comm.	\$40,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$40,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Miss. Dem. Party	\$174,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$174,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Miss. Dem. St. Chair.	\$47,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$47,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	AshKagan Dev. St. Center of Am.	\$540,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$540,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Mont. Dem. Party	\$170,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$170,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Miss. Dem. Party	\$43,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$43,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	ND Dem. 3rd.	\$42,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$42,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	NY Dem. Party	\$48,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$48,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Democratic Party of Oregon	\$48,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$48,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Democratic Party of South Carolina	\$42,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$42,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Democratic Party of Virginia	\$375,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$375,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Democratic Party of Wisconsin	\$165,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$165,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	State Democratic Committee (Delaware)	\$44,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$44,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Ind. Democratic Party	\$300,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$300,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Kansas Democratic Party	\$46,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$46,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Nev. State Democratic Committee	\$47,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$47,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Ohio Democratic Party	\$44,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$44,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Ohio State Representative Committee	\$43,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$43,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	South Dakota Democratic Party	\$46,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$46,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Tennessee Democratic Party	\$43,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$43,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Utah State Democratic Committee	\$44,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$44,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	Democratic Party	\$44,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$44,000.00 to affiliate
Hillary Victory Fund	10/31/2016	Transfer from affiliate	SD State Dem. Convention	\$46,000.00	Transfer from affiliate	Hillary Victory Fund	10/31/2016 \$46,000.00 to affiliate

92. HVF reported transferring a total of \$247,000 to two of its other member state party committees, also on October 31, 2016, including \$200,000 to the Democratic State Central

Committee of LA, and \$47,000 to the Democratic Party of Arkansas. *See* Exhibit 1, Rows 323-24. Neither of those entities reported receiving any transfers from the HVF on or about that day, however. *Id.* The Democratic Party of Arkansas did not report transferring any funds to the DNC on or about that day, either; the Democratic State Central Committee of LA reported transferring \$200,000 to the DNC that day. *Id.* The DNC reported receiving contributions of \$200,000 from the Democratic State Central Committee of LA and \$47,000 from the Democratic Party of Arkansas on October 31, 2016. *Id.* Through these transactions, a total of \$247,000 was transferred from HVF, purportedly through two additional state party committees, to the DNC on or about October 31, 2016. It is reasonably possible HVF never actually transferred funds to these or any other state parties on or about October 31, 2016, but rather transferred those funds directly to the DNC, and/or these state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Name Victor Fund 10/31/2016 \$200,000.00 To Affiliates State 10/31/2016 \$47,000.00 To Affiliates	From Central Comm. LA Democratic Party of Arkansas	Transfer to Affiliates 10/31/2016 \$200,000.00 DNC	From Affiliates 10/31/2016 \$200,000.00 DNC	1. Report ID: FEC-1160811 (A1), Page: 2782, Transaction ID: C11205209 2. Report ID: HFA-Reported, Page: HFA, Transaction ID: HFA-Reported 3. Report ID: FEC-1163002 (A3), Page: 304, Transaction ID: Y027AAB0275 4. Report ID: FEC-1164583 (A3), Page: 705B, Transaction ID: C11205252 5. Report ID: FEC-1160811 (A1), Page: 27536, Transaction ID: C11205209 6. Report ID: HFA-Reported, Page: HFA, Transaction ID: HFA-Reported 7. Report ID: HFA-Reported, Page: HFA, Transaction ID: HFA-Reported
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93. **November 2, 2016**—HVF reported transferring a total of \$1,968,000 to 22 of its member state party committees on November 2, 2016. *See* Exhibit 1, Rows 326-347. The amount of each individual transfer was between \$57,000 and \$750,000. *Id.* Each of those 22 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 22 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, November 2, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$1,968,000 was transferred



funds to the DNC on or about that date, either. *Id.* The DNC reported receiving a transfer of \$58,000 from the Democratic Party of Arkansas the same day, November 2, 2016, as well. *Id.* Through this transaction, \$58,000 was transferred from HVF, purportedly through the Democratic Party of Arkansas, to the DNC on November 2, 2016. It is reasonably possible HVF never actually transferred funds to the Democratic Party of Arkansas or any other state parties on or about November 2, 2016, but rather transferred those funds directly to the DNC, and/or the Democratic Party or Arkansas had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Name Party Date	Amount 11/2/2016 \$58,000.00	Description Transfer Party of Arkansas	Recipient Name Address	Amount 11/2/2016 \$58,000.00	Report ID: FEC-116491411, Page: 1/279, Transaction ID: C11108000 Report ID: FEC-116491411, Page: 1/279, Transaction ID: C11108000 Report ID: FEC-116491411, Page: 1/279, Transaction ID: C11108000
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95. **November 3, 2016**—HVF reported transferring a total of \$5,772,000 to 34 of its member state party committees on November 3, 2016. *See* Exhibit 1, Rows 351-384. The amount of each individual transfer was between \$24,000 and \$744,000. *Id.* Each of those 34 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 34 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, November 3, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$5,772,000 was transferred from HVF, through 34 state party committees, to the DNC on November 3, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.



96. HVF reported transferring a total of \$1,870,000 to four of its other member state party committees, also on November 3, 2015, including \$112,000 to the Democratic State Central Committee of LA, \$24,000 to the Democratic Party of Arkansas, \$204,000 to the Minnesota Democrat-Farmer-Labor Party, and \$1,530,000 to the Nevada State Democratic Party. *See* Exhibit 1, Rows 386-389.

a. The Democratic State Central Committee of LA, Democratic Party of Arkansas, and Nevada State Democratic Party did not report receiving any transfers from HVF on or about that day. *See* Exhibit 1, Rows 386-387, 389.

b. The Minnesota Democrat-Farmer-Labor Party reported receiving \$204,000 from HVF on November 3, 2015. *Id.* *See* Exhibit 1, Row 388.

c. The Democratic Party of Arkansas, the Minnesota Democrat-Farmer-Labor Party, and the Nevada State Democratic Party did not report transferring any funds to the DNC on November 3, 2015. *See* Exhibit 1, Rows 387-89.

d. The Democratic State Central Committee of LA reported transferring \$112,000 to the DNC on November 3, 2015. *See* Exhibit 1, Row 386.

e. The DNC reported receiving \$112,000 from the Democratic State Central Committee of LA, \$24,000 from the Democratic Party of Arkansas, \$204,000 from the Minnesota Democrat-Farmer-Labor Party, and \$1,530,000 from the Nevada State Democratic Party. *See* Exhibit 1, Rows 386-389.

f. Through these transactions, a total of \$1,870,000 was transferred from HVF, purportedly through four additional state party committees, to the DNC on or about November 3, 2015. It is reasonably possible HVF never actually transferred funds to these or any other state parties on or about November 3, 2015, but rather transferred those funds directly to the

DNC, and/or these state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Ally Victory Fund	11/7/2016	\$112,000.00 to AllState	Dem. St Central Conf. LA	Transfer from AllState	Transfer to AllState	11/7/2016	\$112,000.00	DNC	Transfer from AllState	11/7/2016	\$112,000.00	DNC	1. Report ID: FEC-1180211 (A1), Page: 27584, Transaction ID: D373694 2. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 3. Report ID: FEC-1164593 (A1), Page: 204, Transaction ID: 10256099310 4. Report ID: FEC-1164593 (A1), Page: 7928, Transaction ID: C13302031 5. Report ID: FEC-1180811 (A1), Page: 27584, Transaction ID: D373694 6. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 7. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 8. Report ID: FEC-1164593 (A1), Page: 7929, Transaction ID: C31305021 9. Report ID: FEC-1180811 (A1), Page: 27592, Transaction ID: D373694 10. Report ID: FEC-1154924 (A1), Page: 403, Transaction ID: C10161117 11. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 12. Report ID: FEC-1180503 (A1), Page: 7989, Transaction ID: C13302915 13. Report ID: FEC-1180811 (A1), Page: 7993, Transaction ID: D373699 14. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 15. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 16. Report ID: FEC-1164593 (A1), Page: 7989, Transaction ID: C13302915
Ally Victory Fund	11/7/2016	\$25,000.00 to AllState	Democrat Party of Arkansas	Transfer from AllState	Transfer to AllState	11/7/2016	\$25,000.00	DNC	Transfer from AllState	11/7/2016	\$25,000.00	DNC	1. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 2. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 3. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 4. Report ID: FEC-1164593 (A1), Page: 7929, Transaction ID: C31305021 5. Report ID: FEC-1180811 (A1), Page: 27592, Transaction ID: D373694 6. Report ID: FEC-1154924 (A1), Page: 403, Transaction ID: C10161117 7. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 8. Report ID: FEC-1180503 (A1), Page: 7989, Transaction ID: C13302915 9. Report ID: FEC-1180811 (A1), Page: 7993, Transaction ID: D373699 10. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 11. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 12. Report ID: FEC-1164593 (A1), Page: 7989, Transaction ID: C13302915
Ally Victory Fund	11/7/2016	\$204,000.00 to AllState	Miss. Dem. Party	Transfer from AllState	Transfer to AllState	11/7/2016	\$204,000.00	DNC	Transfer from AllState	11/7/2016	\$204,000.00	DNC	1. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 2. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 3. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 4. Report ID: FEC-1164593 (A1), Page: 7929, Transaction ID: C31305021 5. Report ID: FEC-1180811 (A1), Page: 27592, Transaction ID: D373694 6. Report ID: FEC-1154924 (A1), Page: 403, Transaction ID: C10161117 7. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 8. Report ID: FEC-1180503 (A1), Page: 7989, Transaction ID: C13302915 9. Report ID: FEC-1180811 (A1), Page: 7993, Transaction ID: D373699 10. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 11. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 12. Report ID: FEC-1164593 (A1), Page: 7989, Transaction ID: C13302915
Ally Victory Fund	11/7/2016	\$1,330,000.00 to AllState	HV M. Dem. Party	Transfer from AllState	Transfer to AllState	11/7/2016	\$1,330,000.00	DNC	Transfer from AllState	11/7/2016	\$1,330,000.00	DNC	1. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 2. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 3. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 4. Report ID: FEC-1164593 (A1), Page: 7929, Transaction ID: C31305021 5. Report ID: FEC-1180811 (A1), Page: 27592, Transaction ID: D373694 6. Report ID: FEC-1154924 (A1), Page: 403, Transaction ID: C10161117 7. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 8. Report ID: FEC-1180503 (A1), Page: 7989, Transaction ID: C13302915 9. Report ID: FEC-1180811 (A1), Page: 7993, Transaction ID: D373699 10. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 11. Report ID: Not Reported, Page: N/A, Transaction ID: Not Reported 12. Report ID: FEC-1164593 (A1), Page: 7989, Transaction ID: C13302915

97. November 7, 2016—HVF reported transferring a total of \$789,000 to 33 of its member state party committees on November 7, 2016. *See* Exhibit 1, Rows 391-423. The amount of each individual transfer was between \$9,000 and \$40,000. *Id.* Each of those 33 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 33 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, November 7, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$789,000 was transferred from HVF, through 33 state party committees, to the DNC on November 7, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

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Year	Month	Day	Amount	To	From	Party	Account	Page	Page	Page	Page
11/7/2016	11/7/2016	11/7/2016	\$1,000.00	to Affiliates	Colorado Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$1,000.00	11/7/2016	\$1,000.00
11/7/2016	11/7/2016	11/7/2016	\$16,000.00	to Affiliates	Dem. Exec. Comm. PA	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$16,000.00	11/7/2016	\$16,000.00
11/7/2016	11/7/2016	11/7/2016	\$30,000.00	to Affiliates	GA Fed Election Comm	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$30,000.00	11/7/2016	\$30,000.00
11/7/2016	11/7/2016	11/7/2016	\$27,000.00	to Affiliates	Mass State Dem Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$27,000.00	11/7/2016	\$27,000.00
11/7/2016	11/7/2016	11/7/2016	\$35,000.00	to Affiliates	Indev. Dem. Corp. Victory Comm.	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$35,000.00	11/7/2016	\$35,000.00
11/7/2016	11/7/2016	11/7/2016	\$23,000.00	to Affiliates	NY St. Dem. Central Exec. Comm.	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$23,000.00	11/7/2016	\$23,000.00
11/7/2016	11/7/2016	11/7/2016	\$6,000.00	to Affiliates	Mass Dem. Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$6,000.00	11/7/2016	\$6,000.00
11/7/2016	11/7/2016	11/7/2016	\$14,000.00	to Affiliates	Mag. Dem. St. Exec.	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$14,000.00	11/7/2016	\$14,000.00
11/7/2016	11/7/2016	11/7/2016	\$7,000.00	to Affiliates	Michigan Local Exec. Comm.	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$7,000.00	11/7/2016	\$7,000.00
11/7/2016	11/7/2016	11/7/2016	\$12,000.00	to Affiliates	Mich. Dem. Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$12,000.00	11/7/2016	\$12,000.00
11/7/2016	11/7/2016	11/7/2016	\$40,000.00	to Affiliates	MO Dem. St. Exec. Comm.	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$40,000.00	11/7/2016	\$40,000.00
11/7/2016	11/7/2016	11/7/2016	\$12,000.00	to Affiliates	NY St. Dem. Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$12,000.00	11/7/2016	\$12,000.00
11/7/2016	11/7/2016	11/7/2016	\$36,000.00	to Affiliates	NC Dem. Party Fed.	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$36,000.00	11/7/2016	\$36,000.00
11/7/2016	11/7/2016	11/7/2016	\$25,000.00	to Affiliates	NY Dem. Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$25,000.00	11/7/2016	\$25,000.00
11/7/2016	11/7/2016	11/7/2016	\$30,000.00	to Affiliates	Democratic Party of New Mexico	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$30,000.00	11/7/2016	\$30,000.00
11/7/2016	11/7/2016	11/7/2016	\$25,000.00	to Affiliates	Democratic Party of Oregon	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$25,000.00	11/7/2016	\$25,000.00
11/7/2016	11/7/2016	11/7/2016	\$7,000.00	to Affiliates	Democratic Party of South Carolina	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$7,000.00	11/7/2016	\$7,000.00
11/7/2016	11/7/2016	11/7/2016	\$25,000.00	to Affiliates	Democratic Party of Virginia	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$25,000.00	11/7/2016	\$25,000.00
11/7/2016	11/7/2016	11/7/2016	\$14,000.00	to Affiliates	Democratic Party of West Virginia	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$14,000.00	11/7/2016	\$14,000.00
11/7/2016	11/7/2016	11/7/2016	\$60,000.00	to Affiliates	Democratic Executive State (Dorland)	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$60,000.00	11/7/2016	\$60,000.00
11/7/2016	11/7/2016	11/7/2016	\$13,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$13,000.00	11/7/2016	\$13,000.00
11/7/2016	11/7/2016	11/7/2016	\$76,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$76,000.00	11/7/2016	\$76,000.00
11/7/2016	11/7/2016	11/7/2016	\$34,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$34,000.00	11/7/2016	\$34,000.00
11/7/2016	11/7/2016	11/7/2016	\$10,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$10,000.00	11/7/2016	\$10,000.00
11/7/2016	11/7/2016	11/7/2016	\$27,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$27,000.00	11/7/2016	\$27,000.00
11/7/2016	11/7/2016	11/7/2016	\$5,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$5,000.00	11/7/2016	\$5,000.00
11/7/2016	11/7/2016	11/7/2016	\$25,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$25,000.00	11/7/2016	\$25,000.00
11/7/2016	11/7/2016	11/7/2016	\$26,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$26,000.00	11/7/2016	\$26,000.00
11/7/2016	11/7/2016	11/7/2016	\$26,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$26,000.00	11/7/2016	\$26,000.00
11/7/2016	11/7/2016	11/7/2016	\$22,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$22,000.00	11/7/2016	\$22,000.00
11/7/2016	11/7/2016	11/7/2016	\$21,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$21,000.00	11/7/2016	\$21,000.00
11/7/2016	11/7/2016	11/7/2016	\$25,000.00	to Affiliates	Indev. Democratic Party	Transfer from Affiliates	Transfer from Affiliates	11/7/2016	\$25,000.00	11/7/2016	\$25,000.00

98. HVF reported transferring a total of \$124,000 to five of its other member state party committees, also on November 7, 2016, including \$21,000 to the Alaska Democratic Party, \$16,000 to the Democratic State Central Committee of LA, \$29,000 to the Democratic Party of Arkansas, \$24,000 to the Minnesota Democrat-Farmer-Labor Party, and \$34,000 to the Nevada State Democratic Party. *See* Exhibit 1, Rows 425-429.

a. The Alaska Democratic Party, Democratic State Central Committee of LA, Democratic Party of Arkansas, and Nevada State Democratic Party did not report receiving any transfers from HVF on or about that day. *See* Exhibit 1, Rows 425-427, 429.

b. The Minnesota Democrat-Farmer-Labor Party reported receiving \$24,000 from HVF on November 7, 2016. *Id.* *See* Exhibit 1, Row 428.

c. The Democratic Party of Arkansas, the Minnesota Democrat-Farmer-Labor Party, and the Nevada State Democratic Party did not report transferring any funds to the DNC on or about November 7, 2015. *See* Exhibit 1, Rows 427-429.

d. The Alaska Democratic Party reported transferring \$21,000 and the Democratic State Central Committee of LA reported transferring \$16,000 to the DNC on November 7, 2016. *See* Exhibit 1, Row 425-426.

e. The DNC reported receiving \$21,000 from the Alaska Democratic Party, \$16,000 from the Democratic State Central Committee of LA, \$29,000 from the Democratic Party of Arkansas, \$24,000 from the Minnesota Democrat-Farmer-Labor Party, and \$34,000 from the Nevada State Democratic Party on November 7, 2016. *See* Exhibit 1, Rows 425-429.

f. Through these transactions, a total of \$124,000 was transferred from HVF, purportedly through five additional state party committees, to the DNC on or about November 7, 2016. It is reasonably possible HVF never actually transferred funds to these or any other state

parties on or about November 7, 2015, but rather transferred those funds directly to the DNC, and/or these state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Party	Date	Amount	From	To	Report ID	Page	Transaction ID
Alaska Victory Fund	11/7/2016	\$71,000.00	Transfer from Alaska Party	to Affiliate	FEC-1165211 (A1)	Page 27533	Transaction ID: 0377264
Alaska Victory Fund	11/7/2016	\$16,000.00	Transfer from Alaska Party	to Affiliate	FEC-1165211 (A1)	Page 558	Transaction ID: 74273487029
Alaska Victory Fund	11/7/2016	\$29,000.00	Transfer from Alaska Party	to Affiliate	FEC-1165211 (A1)	Page 7956	Transaction ID: C1302892
Alaska Victory Fund	11/7/2016	\$24,000.00	Transfer from Alaska Party	to Affiliate	FEC-1165211 (A1)	Page 27547	Transaction ID: 0377264
Alaska Victory Fund	11/7/2016	\$34,000.00	Transfer from Alaska Party	to Affiliate	FEC-1165211 (A1)	Page 7956	Transaction ID: C1302892
Alaska Victory Fund	11/7/2016	\$34,000.00	Transfer from Alaska Party	to Affiliate	FEC-1165211 (A1)	Page 7956	Transaction ID: C1302892

99. **November 8, 2016**—HVF reported transferring a total of \$1,063,000 to at least 28 of its member state party committees on November 8, 2016. *See* Exhibit 1, Rows 431-458. The amount of each individual transfer was between \$29,000 and \$64,000. *Id.* Each of those 28 state party committees reported receiving a transfer from HVF on the same day, corresponding to the amount of funds HVF had reported transferring to it. *Id.* Each of these 28 state party committees also reported transferring precisely the same amounts of funds they received to the DNC that same day. The DNC reported receiving transfers from all those committees on the same day, November 8, 2016, with each transfer equaling the amount of funds the state party committee had reported it was sending to the DNC. *Id.* Through these transactions, a total of \$1,063,000 was transferred from HVF, through 28 state party committees, to the DNC on November 8, 2016. It is reasonably possible some or all of the state parties had no prior knowledge of, or control over, these transfers because they were handled entirely by HVF, the DNC, HFA, and/or their Treasurers.

Entity	Date	Amount	From	To	Date	Amount	From	To	Transaction ID
Hillary Victory Fund	11/8/2016	\$34,000.00	Alaska Democrat Party	Transfer from Affiliate	11/8/2016	\$34,000.00	DNC	Transfer from Affiliate	1. Report ID: FEC-1180811 (A1), Page: 27542, Transaction ID: D373645 2. Report ID: FEC-115311(A3), Page: 411, Transaction ID: V0202020813 3. Report ID: FEC-1153211 (A3), Page: 550, Transaction ID: V0211A0107 4. Report ID: FEC-1164959 (A1), Page: 7016, Transaction ID: C31308210 5. Report ID: FEC-1180811 (A1), Page: 27544, Transaction ID: D373650 6. Report ID: FEC-1162775 (A2), Page: 981, Transaction ID: 12-68-00016-00016 7. Report ID: FEC-1162775 (A2), Page: 1009, Transaction ID: 22-68-00016-00021 8. Report ID: FEC-1164959 (A1), Page: 7019, Transaction ID: C31308210 9. Report ID: FEC-1180811 (A1), Page: 27554, Transaction ID: D373656 10. Report ID: FEC-1164959 (A1), Page: 7016, Transaction ID: C31308210 11. Report ID: FEC-1180811 (A1), Page: 27512, Transaction ID: D373732 12. Report ID: FEC-1180811 (A1), Page: 27557, Transaction ID: D373676 13. Report ID: FEC-1180811 (A1), Page: 548, Transaction ID: C1110846 14. Report ID: FEC-1133651, Page: 588, Transaction ID: D518454 15. Report ID: FEC-1164959 (A1), Page: 7041, Transaction ID: C31308313 16. Report ID: FEC-1180811 (A1), Page: 27512, Transaction ID: D373732 17. Report ID: FEC-1180811 (A1), Page: 550, Transaction ID: 12-91-00015-00015 18. Report ID: FEC-1158029 (A1), Page: 581, Transaction ID: 22-91-00015-00017 19. Report ID: FEC-1164959 (A1), Page: 7036, Transaction ID: C31308378 20. Report ID: FEC-1180811 (A1), Page: 27567, Transaction ID: D373627 21. Report ID: FEC-1162822 (A2), Page: 822, Transaction ID: 12-93-00023-00023 22. Report ID: FEC-1162822 (A2), Page: 1123, Transaction ID: 22-93-00023-00028 23. Report ID: FEC-1164959 (A1), Page: 7041, Transaction ID: C31308399 24. Report ID: FEC-1180811 (A1), Page: 27497, Transaction ID: D373661 25. Report ID: FEC-1154824 (A3), Page: 454, Transaction ID: C1052214 26. Report ID: FEC-1154824 (A3), Page: 570, Transaction ID: D638147 27. Report ID: FEC-1164959 (A1), Page: 7016, Transaction ID: C31308399 28. Report ID: FEC-1180811 (A1), Page: 27496, Transaction ID: D373651 29. Report ID: FEC-1134371, Page: 431, Transaction ID: 12-09-00010-00010 30. Report ID: FEC-1134371, Page: 446, Transaction ID: 22-09-00010-00020 31. Report ID: FEC-1164959 (A1), Page: 7073, Transaction ID: C31308377 32. Report ID: FEC-1180811 (A1), Page: 27532, Transaction ID: D373614 33. Report ID: FEC-1161992 (A1), Page: 493, Transaction ID: 12-30-00015-00015 34. Report ID: FEC-1161992 (A1), Page: 514, Transaction ID: 22-30-00015-00014 35. Report ID: FEC-1164959 (A1), Page: 7076, Transaction ID: C31308316 36. Report ID: FEC-1180811 (A1), Page: 27496, Transaction ID: D373681 37. Report ID: FEC-1164959 (A2), Page: 581, Transaction ID: V0210A0107 38. Report ID: FEC-1164959 (A2), Page: 558, Transaction ID: V0210A0107 39. Report ID: FEC-1164959 (A1), Page: 7079, Transaction ID: C31308346 40. Report ID: FEC-1180811 (A1), Page: 27591, Transaction ID: D373699 41. Report ID: FEC-1159558 (A2), Page: 1062, Transaction ID: V0210A0107 42. Report ID: FEC-1164959 (A1), Page: 7083, Transaction ID: C31308377 43. Report ID: FEC-1180811 (A1), Page: 27571, Transaction ID: D373757 44. Report ID: FEC-1153127 (A1), Page: 492, Transaction ID: V0202020813 45. Report ID: FEC-1153127 (A1), Page: 488, Transaction ID: V0216A0107 46. Report ID: FEC-1164959 (A1), Page: 7088, Transaction ID: C31308377 47. Report ID: FEC-1180811 (A1), Page: 27570, Transaction ID: D373717 48. Report ID: FEC-1154900 (A1), Page: 497, Transaction ID: 12-68-00024-00024 49. Report ID: FEC-1154900 (A1), Page: 571, Transaction ID: 22-68-00014-00029 50. Report ID: FEC-1164959 (A1), Page: 7098, Transaction ID: C31308399 51. Report ID: FEC-1180811 (A1), Page: 27507, Transaction ID: D373662 52. Report ID: FEC-1165535 (A1), Page: 427, Transaction ID: 12-78-00024-00024 53. Report ID: FEC-1165535 (A1), Page: 436, Transaction ID: 22-78-00019-00019 54. Report ID: FEC-1164959 (A1), Page: 7031, Transaction ID: C31308399 55. Report ID: FEC-1180811 (A1), Page: 27567, Transaction ID: D373727 56. Report ID: FEC-1167330 (A1), Page: 868, Transaction ID: V0216A0107 57. Report ID: FEC-1167330 (A1), Page: 982, Transaction ID: V0209A0107 58. Report ID: FEC-1164959 (A1), Page: 7035, Transaction ID: C31308376 59. Report ID: FEC-1180811 (A1), Page: 27571, Transaction ID: D373727 60. Report ID: FEC-1130988, Page: 318, Transaction ID: 12-33-00021-00021 61. Report ID: FEC-1130988, Page: 328, Transaction ID: 22-33-00021-00021 62. Report ID: FEC-1164959 (A1), Page: 7024, Transaction ID: C31308340 63. Report ID: FEC-1180811 (A1), Page: 27571, Transaction ID: D373727 64. Report ID: FEC-1153079 (A1), Page: 100, Transaction ID: V0210A0107 65. Report ID: FEC-1163879 (A1), Page: 109, Transaction ID: V0210A0107 66. Report ID: FEC-1164959 (A1), Page: 7081, Transaction ID: C31308367 67. Report ID: FEC-1180811 (A1), Page: 27571, Transaction ID: D373727 68. Report ID: FEC-1133732, Page: 548, Transaction ID: 22-30-00021-00021 69. Report ID: FEC-1164959 (A1), Page: 7084, Transaction ID: C31308367 70. Report ID: FEC-1180811 (A1), Page: 27511, Transaction ID: D373712 71. Report ID: FEC-1154926 (A1), Page: 671, Transaction ID: 12-68-00019-00019 72. Report ID: FEC-1164959 (A1), Page: 684, Transaction ID: 22-68-00014-00014 73. Report ID: FEC-1164959 (A1), Page: 7093, Transaction ID: C31308387 74. Report ID: FEC-1180811 (A1), Page: 27570, Transaction ID: D373727 75. Report ID: FEC-1152484 (A1), Page: 337, Transaction ID: V0202020813 76. Report ID: FEC-1152484 (A1), Page: 370, Transaction ID: V0204A0107 77. Report ID: FEC-1164959 (A1), Page: 7096, Transaction ID: C31308399 78. Report ID: FEC-1180811 (A1), Page: 27494, Transaction ID: D373640 79. Report ID: FEC-1162954 (A1), Page: 447, Transaction ID: 12-64-00026-00026 80. Report ID: FEC-1162954 (A1), Page: 483, Transaction ID: 22-64-00017-00017 81. Report ID: FEC-1164959 (A1), Page: 7101, Transaction ID: C31308399 82. Report ID: FEC-1180811 (A1), Page: 27566, Transaction ID: D373757 83. Report ID: FEC-1147255, Page: 1278, Transaction ID: SA12.20508 84. Report ID: FEC-1147255, Page: 1284, Transaction ID: SA22.20517 85. Report ID: FEC-1164959 (A1), Page: 7079, Transaction ID: C31308399 86. Report ID: FEC-1180811 (A1), Page: 27566, Transaction ID: D373727 87. Report ID: FEC-1160503 (A1), Page: 498, Transaction ID: V0208A0107 88. Report ID: FEC-1160503 (A1), Page: 534, Transaction ID: V0208A0107 89. Report ID: FEC-1164959 (A1), Page: 7104, Transaction ID: C31308342 90. Report ID: FEC-1180811 (A1), Page: 27571, Transaction ID: D373727 91. Report ID: FEC-1160503 (A1), Page: 516, Transaction ID: 12-34-00016-00016 92. Report ID: FEC-1180811 (A1), Page: 324, Transaction ID: 22-34-00016-00016 93. Report ID: FEC-1164959 (A1), Page: 7108, Transaction ID: C31308399 94. Report ID: FEC-1180811 (A1), Page: 27497, Transaction ID: D373671 95. Report ID: FEC-1165014 (A1), Page: 688, Transaction ID: 12-30-00019-00019 96. Report ID: FEC-1165014 (A1), Page: 694, Transaction ID: 22-30-00020-00020 97. Report ID: FEC-1164959 (A1), Page: 7110, Transaction ID: C31308399 98. Report ID: FEC-1180811 (A1), Page: 27508, Transaction ID: D373582 99. Report ID: FEC-1134376, Page: 46, Transaction ID: V0204A0107 100. Report ID: FEC-1134376, Page: 57, Transaction ID: V0216A0107 101. Report ID: FEC-1164959 (A1), Page: 7116, Transaction ID: C31308399 102. Report ID: FEC-1180811 (A1), Page: 27505, Transaction ID: D373727 103. Report ID: FEC-1166652 (A1), Page: 529, Transaction ID: 12-12-00015-00015 104. Report ID: FEC-1166652 (A1), Page: 547, Transaction ID: 22-12-00016-00016 105. Report ID: FEC-1164959 (A1), Page: 7119, Transaction ID: C31308399 106. Report ID: FEC-1180811 (A1), Page: 27546, Transaction ID: D373757 107. Report ID: FEC-1181447 (A1), Page: 370, Transaction ID: V0216A0107 108. Report ID: FEC-1181447 (A1), Page: 395, Transaction ID: V0216A0107 109. Report ID: FEC-1164959 (A1), Page: 7112, Transaction ID: C31308399

100. It also appears one or more transactions were incorrectly reported or completely omitted concerning transfers that purportedly occurred on November 8 among HVF, the DNC, and the following state parties: Democratic State Central Committee of LA, Democratic Party of

Arkansas, Nevada State Democratic Party, Indiana Democratic Congressional Victory Committee, Idaho State Democratic Party, Maine Democratic Party, Massachusetts State Democratic Committee, North Carolina Democratic Party Federal, Democratic Party of Wisconsin, and Iowa Democratic Party. See Exhibit 1, Rows 460-469.

101. The following chart summarizes the total amounts of pass-through transfers from HVF through state parties to the DNC:

<b>DATE</b>	<b>TOTAL AMOUNT TRANSFERRED TO DNC</b>	<b>TRANSACTIONS ON CHART</b>
October 1-2, 2015	\$216,000	Rows 2-10
October 1-2, 2015 (additional transactions w/ inconsistencies among reports)	\$48,000	Rows 12-13
November 2-3, 2015	\$505,000	Rows 15-31
November 2-3, 2015 (additional transactions w/ inconsistencies among reports)	\$102,000	Rows 33-36
December 1-7, 2015	\$799,400	Rows 38-63
December 1-7, 2015 (additional transactions w/ inconsistencies among reports)	\$83,600	Rows 65-66
January 4, 2016	\$1,527,278.16	Rows 68-83
January 4, 2016 (additional transactions w/ inconsistencies among reports)	\$73,000	Row 85
April 2016	\$707,000	Rows 87-90
May 2016	\$900,000	Rows 92-95
May 2016 (additional transactions w/ inconsistencies among reports)	\$100,000	Row 97
July 13, 2016	\$5,000,000	Rows 99-106
July 26, 2016	\$5,438,000	Rows 108-120
August 11, 2016	\$4,795,000	Rows 122-138
August 11, 2016 (additional transactions w/ inconsistencies among reports)	\$700,000	Row 140
August 26, 2016	\$5,500,000	Rows 142-157
September 12, 2016	\$3,200,000	Rows 159-166
September 12, 2016 (additional transactions w/ inconsistencies among reports)	\$350,000	Row 168

September 26, 2016	\$2,900,000	Rows 170 – 176
September 26, 2016 (additional transactions w/ inconsistencies among reports)	\$300,000	Row 177
October 6, 2016	\$2,750,000	Rows 179-185
October 6, 2016 (additional transactions w/ inconsistencies among reports)	\$900,000	Row 187
October 7, 2016	\$550,000	Row 189
October 11, 2016	\$8,400,000	Rows 191-201
October 18, 2016	\$4,000,000	Rows 203-205
October 18, 2016 (additional transactions w/ inconsistencies among reports)	\$275,000	Row 207
October 20, 2016	\$8,435,000	Rows 209-229
October 24, 2016	\$1,018,000	Rows 231-234
October 24, 2016 (additional transactions w/ inconsistencies among reports)	\$1,225,000	Rows 236-237
October 26, 2016	\$7,115,000	Rows 239-265
October 26, 2016 (additional transactions w/ inconsistencies among reports)	\$125,000	Row 267
October 27, 2016	\$2,075,000	Rows 269-290
October 27, 2016 (additional transactions w/ inconsistencies among reports)	\$15,000	Row 292
October 31, 2016	\$2,862,000	Rows 294-321
October 31, 2016 (additional transactions w/ inconsistencies among reports)	\$247,000	Rows 323-324
November 2, 2016	\$1,968,000	Rows 326-347
November 2, 2016 (additional transactions w/ inconsistencies among reports)	\$58,000	Row 349
November 3, 2016	\$5,772,000	Rows 351-384
November 3, 2016 (additional transactions w/ inconsistencies among reports)	\$1,870,000	Rows 386-389
November 7, 2016	\$789,000	Rows 391-423
November 7, 2016 (additional transactions w/ inconsistencies among reports)	\$124,000	Rows 425-429
November 8, 2016	\$1,063,000	Rows 431-458
<b>TOTAL</b>	<b>\$84,880,278.20</b>	

**THE DNC CONTRIBUTED TO HFA MOST OF THE FUNDS IT RECEIVED FROM HVF THROUGH THE STATE PARTIES, COORDINATED ITS EXPENDITURES WITH HFA, AND OTHERWISE SPENT ITS FUNDS SUBJECT TO THE DIRECTION AND CONTROL OF HFA**

102. Between October 1, 2015 and Election Day, when funds were being funneled from HVF through the state parties to the DNC, the DNC transferred much of those funds to HFA; engaged in coordinated expenditures with HFA; and otherwise gave direction, oversight, and control of its funds, including funds that originated with HVF, to HFA and Clinton.

***Contributions from the DNC to HFA***

103. According to press reports, between October 1, 2015 and Election Day, the DNC contributed substantial amounts of money to HFA, including funds that had originated from HVF and were transferred through state parties to the DNC.

104. Former DNC Chairwoman Donna Brazile publicly admitted funds funneled from HVF through state parties to the DNC were then passed along to HFA. She confessed:

Individuals who had maxed out their \$2,700 contribution limit to the campaign could write an additional check for \$353,400 to the Hillary Victory Fund—that figure represented \$10,000 to each of the 32 states’ parties who were part of the Victory Fund agreement—\$320,000—and \$33,400 to the DNC. The money would be deposited in the states first, and transferred to the DNC shortly after that. Money in the battleground states usually stayed in that state, ***but all the other states funneled that money directly to the DNC, which quickly transferred the money to Brooklyn.***

<https://www.politico.com/magazine/story/2017/11/02/clinton-brazile-hacks-2016-215774>

(emphasis added).

105. *Politico* described HVF as “‘essentially . . . money laundering’ for the Clinton campaign.” *Id.*

***Coordinated Expenditures Between the DNC and HFA***

106. Between October 1, 2015 and Election Day, while funds were being funneled from HVF through state parties to the DNC, the DNC also was engaged in coordinated expenditures with Clinton and HFA.

107. The following is a summary chart of the DNC's reported coordinated expenditures with HFA. For a complete listing with citations to FEC records, *see* Exhibit 2.



10/31/2016	\$	20,700.00
11/1/2016	\$	411,600.00
11/2/2016	\$	722,500.00
11/2/2016	\$	500,000.00
11/4/2016	\$	28,800.00
11/4/2016	\$	637.00
11/4/2016	\$	1,076,125.50
11/4/2016	\$	17,750.00
11/4/2016	\$	24,915.00
11/4/2016	\$	33,625.00
11/8/2016	\$	28,800.00
11/8/2016	\$	23,940.00
11/10/2016	\$	135,224.08
11/10/2016	\$	480,612.60
11/10/2016	\$	2,250,000.00
11/14/2016	\$	21,012.52
11/14/2016	\$	10,617.66
11/28/2016	\$	340.00
<b>TOTAL</b>	<b>\$</b>	<b>\$22,816,531.83</b>

108. Citations to the FEC reports documenting each of these coordinated expenditures may be found in Exhibit 2.

109. These coordinated expenditures between the DNC and HFA establish the DNC was spending its money in cooperation with, or at the direction or suggestion of, HFA. Contributions to HVF that HVF and/or its member state parties earmarked for the DNC therefore may be treated as being made indirectly on behalf of Clinton.

***HFA Control of DNC Expenditures***

110. Finally, throughout much of the 2016 presidential campaign, Clinton and HFA exercised oversight, direction, and control over the expenditure of DNC funds, causing DNC accounts to be considered Clinton's accounts for purposes of federal campaign finance law.

111. Former DNC Chairwoman Donna Brazile publicly allocuted, “As Hillary’s campaign gained momentum, she resolved the party’s debt and put it on a starvation diet. It had become dependent on her campaign for survival, for which she expected to wield control of its operations.” <https://www.politico.com/magazine/story/2017/11/02/clinton-brazile-hacks-2016-215774>

112. Gary Gensler, the Chief Financial Officer of HFA, stated the Democratic Party was “fully under the control of the Clinton campaign . . . . The campaign had the DNC on life support, giving it money every month to meet its basic expenses, while the campaign was using the party as a fund-raising clearinghouse.” *Id.*

113. Brazile further revealed, “[T]he Joint Fund-Raising Agreement between the DNC, the Hillary Victory Fund, and Hillary for America. . . . specified that in exchange for raising money and investing in the DNC, ***Hillary would control the party’s finances, strategy, and all the money raised.*** Her campaign had the right of refusal of who would be the party communications director, and it would make final decisions on all the other staff. ***The DNC also was required to consult with the campaign about all other staffing, budgeting, data, analytics, and mailings.***” *Id.* (emphasis added).

114. In July 2016, *Politico* reported, “[W]hat happens to the cash in the Hillary Victory Fund after its initial distribution is left almost entirely to the ***discretion of the Clinton campaign’s chief operating officer***, Beth Jones, who serves as the treasurer of the victory fund.” <https://www.politico.com/story/2016/07/dnc-leak-clinton-team-deflected-state-cash-concerns-226191> (emphasis added).

115. Consequently, Clinton and HFA exercised oversight, direction, and control over funds over the DNC's funds, including funds the DNC obtained from HVF that were reported as flowing through the state parties.

116. It is highly likely—if not an unavoidable inference—at least some major donors were assured the substantial sums they contributed to HVF would wind up in the hands of, or under control of, the Clinton campaign and not were never actually intended to be retained or used by assorted state Democratic party committees.

**THE DEMOCRATIC PARTY'S "MONEY LAUNDERING" CONSPIRACY THROUGH HVF IS EXACTLY THE TYPE OF ARRANGEMENT THE U.S. SUPREME COURT HELD WOULD BE ILLEGAL IN MCCUTCHEON V. FEC**

117. In *McCutcheon v. FEC*, 134 S. Ct. 1434 (2014), the Supreme Court discussed a hypothetical in which:

a donor gives a \$500,000 check to a joint fundraising committee composed of a candidate, a national party committee, and most of the party's state party committees (actually, 47 of the 50). The committees divide up the money so that each one receives the maximum contribution permissible under the base limits, but then each transfers its allocated portion to the same single committee. That committee uses the money for coordinated expenditures on behalf of a particular candidate.

*Id.* at 1454-55 (quotation marks and citations omitted).

118. The Court held this scenario "seems unlikely." *Id.* at 1455 (quotation marks and citation omitted).

119. The Court further declared such an arrangement "*relies on illegal earmarking.*" *Id.* at 1455 (emphasis added).

120. The Court explained, "[A] joint fundraising committee is simply a mechanism for individual committees to raise funds collectively, not to circumvent base limits or earmarking rules. *Under no circumstances may a contribution to a joint fundraising committee result in an*

allocation that exceeds the contribution limits applicable to its constituent parts; the committee is in fact required to return any excess funds to the contributor.” *Id.* (citing 11 C.F.R. §§ 102.17(c)(5), 102.17(c)(6)(i)) (emphasis added). Moreover, “the earmarking provision prohibits an individual from directing funds ‘through an intermediary or conduit’ to a particular candidate,” *id.* (citing 52 U.S.C. § 30116(a)(8)), even if an arrangement were only “implicit,” *id.* (citing 11 C.F.R. § 110.6(b)(1)) (emphasis added).

121. The Court concluded, “[T]his circumvention scenario could not succeed without assuming that nearly 50 separate party committees would engage in a transparent violation of the earmarking rules.” *Id.*

122. Not even the U.S. Supreme Court could anticipate the Democratic Party’s brazen willingness to arrogantly flout federal law to rig the presidential nomination process and funnel tens of millions of dollars to Hillary Clinton while hypocritically attempting to discredit the legitimately elected President, Donald J. Trump.

### **CAUSES OF ACTION**

#### **COUNT I – AGAINST ALL RESPONDENTS**

##### **Earmarked Contributions in Violation of 52 U.S.C. § 30116(a)(8) and 11 C.F.R. § 110.6**

123. Complainant hereby re-alleges incorporates by reference the preceding paragraphs as if fully set forth herein.

124. Over 99% of contributions to HVF, totaling over \$80 million, were funneled through its state party member committees to the DNC.

125. The uniformity, regularity, magnitude, immediacy, and extent of these hundreds of reported transfers show contributions to HVF were directly or indirectly earmarked to be transferred through HVF’s member state party committees to the DNC.

126. Public statements from the former Chairwoman and CFO of the Democratic Party corroborate the existence of this scheme.

127. Contributions from HVF's member state party committees to the DNC, in turn, were:

- a. Transferred to HFA;
- b. Used to fund expenditures coordinated between the DNC and HFA; and/or
- c. Spent subject to the direction, oversight, and control of HFA, rendering the DNC's account a candidate account for purposes of campaign finance law.

128. Through this shell game, contributions to HVF were directed through intermediaries to the DNC, which in turn:

- a. Acted as a further intermediary to transfer such funds to HFA;
- b. Engaged in coordinated expenditures with HFA; and/or
- c. Spent those funds subject to the direction, oversight, and control of HFA, rendering the DNC's account a candidate account for purposes of campaign finance law.

129. Contributions to HVF that HVF and/or its member state parties earmarked for the DNC therefore may be treated as being made indirectly on behalf of Clinton.

130. None of the Respondents reported these contributions in the manner required by 52 U.S.C. § 30116(a)(8) for earmarked contributions.

WHEREFORE, Respondents violated 52 U.S.C. § 30116(a)(8) and 11 C.F.R. § 110.6.

**COUNT II – AGAINST RESPONDENTS DNC AND WILLIAM Q. DERROUGH**  
**Accepting Contributions in the Name of Another in Violation of 52 U.S.C. § 30122**

131. Complainant hereby re-alleges incorporates by reference the preceding paragraphs as if fully set forth herein.

132. The DNC knowingly accepted contributions made by one person in the name of another in violation of 52 U.S.C. § 30122.

133. In applying 52 U.S.C. § 30122, it is necessary to “look past the intermediary’s essentially ministerial role to the substance of the transaction.” *United States v. O’Donnell*, 608 F.3d 546, 550 (9th Cir. 2010); accord *United States v. Whittemore*, 776 F.3d 1074, 1079 (9th Cir. 2015).

134. Over 99% of contributions to HVF, totaling over \$80 million, were funneled through its state party member committees to the DNC.

135. The uniformity, regularity, magnitude, immediacy, and extent of these hundreds of reported transfers show that, if those transactions actually occurred as reported, HVF’s member state party committees were playing an essentially ministerial role. Over \$80 million in contributions to HVF was transferred into its state party members’ accounts for moments, if at all, before being immediately transferred to the DNC pursuant to a longstanding, prearranged understanding, agreement, or arrangement among HVF, its member state party committees, the DNC, and HFA. HVF’s state party committee members were used as pass-through intermediaries to funnel contributions from HVF to the DNC and ultimately HFA.

136. Public statements by state party committees that belonged to HVF confirm funds from HVF flowed through their accounts subject to the custody, direction, and control of HVF itself, the DNC, and/or HFA or their Treasurers.

137. In substance, contributions to HVF were not actually contributions to its member committees, but rather sham contributions papered through these willing co-conspirator intermediary state party committee members to the DNC itself (and ultimately HFA).

138. The DNC reported receiving contributions from HVF's member state party committees, rather than reporting the actual sources of the funds: HVF's contributors.

WHEREFORE, Respondent DNC violated 52 U.S.C. § 30122.

**COUNT III – AGAINST RESPONDENTS DNC AND WILLIAM Q. DERROUGH**  
**Accepting Excessive Contributions in Violation of 52 U.S.C. § 30116(a)(1)(B)**

139. Complainant hereby re-alleges incorporates by reference the preceding paragraphs as if fully set forth herein.

140. Over 99% of contributions to HVF, totaling over \$80 million, were funneled through its state party member committees to the DNC.

141. The uniformity, regularity, magnitude, immediacy, and extent of these hundreds of reported transfers show that, if those transactions actually occurred as reported, contributions to HVF were directly or indirectly earmarked to be transferred through HVF's member state party committees to the DNC, and HVF's member state party committees were playing an essentially ministerial role. These hundreds of virtually instantaneous transfers involving over \$80 million were part of a longstanding, prearranged understanding, agreement, or arrangement among HVF, its member state party committees, the DNC, and HFA.

142. Pursuant to 52 U.S.C. §§ 30116(a)(8) and 30122, contributions to HVF should not be treated as contributions to its member state party committees, but rather as contributions to the DNC. The state party committees, as mere straw man intermediaries, should be disregarded.

143. Any contributions to HVF that would have resulted in more than \$33,400 per contributor passing through its member state party committees to the DNC would violate federal limits on contributions from individuals to national political party committees, as adjusted for inflation. See 52 U.S.C. § 30116(a)(1)(B); 80 FED. REG. at 5,752.

144. The DNC knowingly and willfully accepted contributions in excess of federal limits.

WHEREFORE, Respondent DNC violated 52 U.S.C. § 30116(a)(1)(B).

**COUNT IV – AGAINST RESPONDENTS DNC AND WILLIAM Q. DERROUGH  
False, Inaccurate, and/or Incomplete Reports in Violation of 52 U.S.C. § 30104**

145. Complainant hereby re-alleges incorporates by reference the preceding paragraphs as if fully set forth herein.

146. Over 99% of contributions to HVF, totaling over \$80 million, were funneled through its state party member committees to the DNC.

147. The uniformity, regularity, magnitude, immediacy, and extent of these hundreds of reported transfers show that, if these transactions actually occurred as reported, contributions to HVF were directly or indirectly earmarked to be transferred through HVF's member state party committees to the DNC, and HVF's member state party committees were playing an essentially ministerial role. These hundreds of virtually instantaneous transfers involving hundreds of millions of dollars were part of a longstanding, prearranged understanding, agreement, or arrangement among HVF, its member state party committees, the DNC, and HFA.

148. Pursuant to 52 U.S.C. §§ 30116(a)(8) and 30122, contributions to HVF should not be treated as contributions to its member state party committees, but rather as contributions to the DNC.

149. The DNC did not report funds it received from HVF's member state party committees as contributions from HVF's contributors. Its statutorily required reports to the FEC throughout 2016 are therefore false, inaccurate, and/or incomplete.

WHEREFORE, Respondent DNC violated 52 U.S.C. § 30116(a)(1)(B).

**COUNT V – AGAINST ALL RESPONDENTS**  
**False, Inaccurate, and/or Incomplete Reports in Violation of 52 U.S.C. § 30104**

150. Complainant hereby re-alleges incorporates by reference the preceding paragraphs as if fully set forth herein.

151. Over 99% of contributions to HVF, totaling over \$80 million, were funneled through its state party member committees to the DNC.

152. The uniformity, regularity, magnitude, immediacy, and extent of these hundreds of reported transfers show that, if these transactions actually occurred as reported, contributions to HVF were directly or indirectly earmarked to be transferred through HVF's member state party committees to the DNC, and HVF's member state party committees were playing an essentially ministerial role. These hundreds of virtually instantaneous transfers involving hundreds of millions of dollars were part of a longstanding, prearranged understanding, agreement, or arrangement among HVF, its member state party committees, the DNC, and HFA.

153. It is reasonably possible HVF did not actually transfer contributions into its state party members' accounts for moments before they were immediately re-transferred to the DNC, but rather transferred those funds directly to the DNC. In the alternative, it is reasonably possible based on published press accounts featuring quotes from state party committees that HVF, the DNC, and/or HFA, or their Treasurers actually maintained control over contributions to HVF and executed the transactions to funnel those funds through the state party committees' accounts to the DNC without the state party committees' prior knowledge or consent concerning those transfers. In either case, Respondents' reports to the FEC claiming the funds were transferred through HVF's member state party committees were intentionally false.

WHEREFORE, on information and belief, it is reasonably possible Respondent DNC violated 52 U.S.C. § 30104.

**COUNT VI – AGAINST RESPONDENTS DNC,  
HFA, WILLIAM Q. DERROUGH, AND CLINTON**  
**Making and Accepting Excessive Contributions in Violation of 52 U.S.C. § 30116(a)(1)(B)**

154. Complainant hereby re-alleges incorporates by reference the preceding paragraphs as if fully set forth herein.

155. The DNC allowed HFA and its agents to exercise oversight, direction, and control over the expenditure of DNC funds, including but not limited to funds the DNC obtained through HVF.

156. As noted earlier, Former DNC Chairwoman Donna Brazile publicly admitted, “As Hillary’s campaign gained momentum, she resolved the party’s debt and put it on a starvation diet. It had become dependent on her campaign for survival, for which she expected to wield control of its operations.” <https://www.politico.com/magazine/story/2017/11/02/clinton-brazile-hacks-2016-215774>

157. Gary Gensler, the Chief Financial Officer of HFA, stated the Democratic Party was “fully under the control of the Clinton campaign . . . . The campaign had the DNC on life support, giving it money every month to meet its basic expenses, while the campaign was using the party as a fund-raising clearinghouse.” *Id.*

158. Brazile further confessed, “[T]he Joint Fund-Raising Agreement between the DNC, the Hillary Victory Fund, and Hillary for America . . . specified that in exchange for raising money and investing in the DNC, ***Hillary would control the party’s finances, strategy, and all the money raised.*** Her campaign had the right of refusal of who would be the party communications director, and it would make final decisions on all the other staff. ***The DNC also was required to consult with the campaign about all*** other staffing, budgeting, data, analytics, and ***mailings.***” *Id.* (emphasis added).

159. In July 2016, *Politico* reported, “[W]hat happens to the cash in the Hillary Victory Fund after its initial distribution is left almost entirely to the *discretion of the Clinton campaign’s chief operating officer*, Beth Jones, who serves as the treasurer of the victory fund.” <https://www.politico.com/story/2016/07/dnc-leak-clinton-team-deflected-state-cash-concerns-226191> (emphasis added).

160. By allowing Clinton and HFA to exercise direction, oversight, and control over the DNC’s funds, the DNC made a contribution of those funds to Clinton and HFA. The amount of DNC funds over which Clinton and HFA exercised oversight, direction, and control exceeded the amount of contributions and coordinated expenditures a national political party committee may make with a presidential candidate.

WHEREFORE, Respondent DNC violated 52 U.S.C. § 30116 by making, and Respondent HFA violated 52 U.S.C. § 30116 by receiving, contributions in excess of federal limits from each other.

**COUNT VII – AGAINST RESPONDENT STATE POLITICAL PARTY COMMITTEES  
Inaccurate and/or Incomplete Reports in Violation of 52 U.S.C. § 30104**

161. Complainant hereby re-alleges incorporates by reference the preceding paragraphs as if fully set forth herein.

162. At the very least, the Respondent State Political Party Committees filed inaccurate and/or incomplete reports that failed to disclose transfers of funds they received from HVF, and/or transfers of funds they made to the DNC.

163. HVF reported transferring a total of \$48,000 to two state party committees on October 1, 2015, *see* Exhibit 1, Rows 12-13, but neither of those entities reported receiving those funds, including;

- a. \$24,000 to the Mississippi Democratic Party; and

- b. \$24,000 to the Utah State Democratic Party.

164. The DNC reported receiving a total of \$48,000 from two state party committees on October 1, 2015, *see* Exhibit 1, Rows 12-13, but neither of those entities reported transferring those funds to the DNC, including:

- a. \$24,000 from the Mississippi Democratic Party; and
- b. \$24,000 from the Utah State Democratic Party.

165. HVF reported transferring a total of \$102,000 to four state party committees on November 2, 2015, *see* Exhibit 1, Rows 33-36, but none of those entities reported receiving those funds, including;

- a. \$19,500 to the Mississippi Democratic Party;
- b. \$19,500 to the Democratic Party of South Carolina;
- c. \$43,500 to the Tennessee Democratic Party; and
- d. \$19,500 to the Utah State Democratic Party.

166. The DNC reported receiving a total of \$102,000 from four state party committees on November 1, 2015, *see* Exhibit 1, Rows 33-36, but none of those entities reported transferring those funds to the DNC, including:

- a. \$19,500 from the Mississippi Democratic Party;
- b. \$19,500 from the Democratic Party of South Carolina;
- c. \$43,500 from the Tennessee Democratic Party; and
- d. \$19,500 from the Utah State Democratic Party.

167. The DNC reported receiving a total of \$83,600 from two state party committees on December 2, 2015, *see* Exhibit 1, Rows 65-66, but neither of those entities reported transferring those funds to the DNC, including:

- a. \$63,000 from the Democratic Party of Arkansas; and
- b. \$20,600 from the Massachusetts Democratic State Committee.

168. HVF reported transferring \$73,000 to the Kentucky State Democratic Central Executive Committee on January 4, 2016. *See Exhibit 1, Row 85.* The Kentucky State Democratic Central Executive Committee did not report receiving any funds from HVF on or about this date. *Id.*

169. HVF reported transferring \$100,000 to the Idaho State Democratic Party on May 12, 2016, but the Idaho State Democratic Party did not report receiving a transfer from HVF on or about that date. *See Exhibit 1, Row 97.*

170. The DNC reported receiving \$100,000 from the Idaho State Democratic Party on May 12, 2016, but the Idaho State Democratic Party did not report transferring funds to the DNC on or about that date. *See Exhibit 1, Row 97.*

171. HVF reported transferring \$350,000 to the WV State Democratic Executive Committee on September 12, 2016. *See Exhibit 1, Row 168.* The WV State Democratic Executive Committee did not report receiving any funds from HVF on or about this date. *Id.*

172. The DNC reported receiving \$350,000 from the WV State Democratic Executive Committee on September 12, 2016, but the WV State Democratic Executive Committee did not report transferring funds to the DNC on or about that date. *See Exhibit 1, Row 168.*

173. HVF reported transferring \$300,000 to the Mississippi Democratic Party on September 26, 2016. *See Exhibit 1, Row 177.* The Mississippi Democratic Party reported receiving \$350,000 from HVF on that date, however. *Id.*

174. The Mississippi Democratic Party reported transferring \$350,000 to the DNC on September 26, 2016. *See* Exhibit 1, Row 177. The DNC reported receiving only \$300,000 from the Mississippi Democratic Party on that date, however. *Id.*

175. HVF reported transferring \$900,000 to the Kansas Democratic Party on October 6, 2016. *See* Exhibit 1, Row 187. The Kansas Democratic Party did not report receiving any funds from HVF on or about that date, however. *Id.*

176. The DNC reported receiving \$900,000 from the Kansas Democratic Party on October 6, 2016, but the Kansas Democratic Party did not report transferring funds to the DNC on or about that date. *See* Exhibit 1, Row 187.

177. HVF reported transferring \$275,000 to the Kentucky State Democratic Central Executive Committee on October 18, 2016, but the Kentucky State Democratic Central Executive Committee did not report receiving funds from HVF on or about that date. *See* Exhibit 1, Row 207.

178. HVF reported transferring \$400,000 to the Democratic State Central Committee of LA on October 24, 2014, but the Democratic State Central Committee of LA did not report receiving funds from HVF on or about that date. *See* Exhibit 1, Row 236.

179. HVF reported transferring \$825,000 to the Democratic Party of Arkansas on October 24, 2014, but the Democratic Party of Arkansas did not report receiving funds from HVF on or about that date. *See* Exhibit 1, Row 237.

180. The DNC reported receiving \$825,000 from the Democratic Party of Arkansas on October 24, 2014, but the Democratic Party of Arkansas did not report transferring funds to the DNC on or about that date. *See* Exhibit 1, Row 237.

181. HVF reported transferring \$125,000 to the Democratic Party of Arkansas on October 26, 2016. See Exhibit 1, Row 267. The Democratic Party of Arkansas did not report receiving any funds from HVF on or about that date, however. *Id.*

182. The DNC reported receiving \$125,000 from the Democratic Party of Arkansas on October 26, 2016, but the Democratic Party of Arkansas did not report transferring funds to the DNC on or about that date. See Exhibit 1, Row 267.

183. HVF reported transferring \$15,000 to the Democratic Party of Arkansas on October 27, 2016. See Exhibit 1, Row 292. The Democratic Party of Arkansas did not report receiving any funds from HVF on or about that date, however. *Id.*

184. The DNC reported receiving \$15,000 from the Democratic Party of Arkansas on October 27, 2016, but the Democratic Party of Arkansas did not report transferring funds to the DNC on or about that date. See Exhibit 1, Row 292.

185. HVF reported transferring \$200,000 to the Democratic State Central Committee of LA on October 31, 2016, but the Democratic State Central Committee of LA did not report receiving funds from HVF on or about that date. See Exhibit 1, Row 323.

186. HVF reported transferring \$47,000 to the Democratic Party of Arkansas on October 31, 2016, but the Democratic Party of Arkansas did not report receiving funds from HVF on or about that date. See Exhibit 1, Row 324.

187. The DNC reported receiving \$47,000 from the Democratic Party of Arkansas on October 31, 2016, but the Democratic Party of Arkansas did not report transferring funds to the DNC on or about that date. See Exhibit 1, Row 324.

188. HVF reported transferring \$58,000 to the Democratic Party of Arkansas on November 2, 2016, but the Democratic Party of Arkansas did not report receiving funds from HVF on or about that date. *See* Exhibit 1, Row 349.

189. The DNC reported receiving \$58,000 from the Democratic Party of Arkansas on November 2, 2016, but the Democratic Party of Arkansas did not report transferring funds to the DNC on or about that date. *See* Exhibit 1, Row 349.

190. HVF reported transferring a total of \$1,666,000 to three state party committees on November 3, 2016, but none of them reported receiving those transfers, *see* Exhibit 1, Rows 386-387, 389, including:

- a. \$112,000 to the Democratic State Central Committee of LA,
- b. \$24,000 to the Democratic Party of Arkansas, and
- c. \$1,530,000 to the Nevada State Democratic Party.

191. The DNC reported receiving a total of \$1,758,000 from three state party committees on November 3, 2016, but none of those committees reported contributing funds to the DNC, *see* Exhibit 1, Rows 387-389, including:

- a. \$24,000 from the Democratic Party of Arkansas,
- b. \$204,000 from the Minnesota Democrat-Farmer-Labor Party, and
- c. \$1,530,000 from the Nevada State Democratic Party.

192. HVF reported transferring a total of \$100,000 to four state party committees on November 7, 2016, but none of them reported receiving those transfers, *see* Exhibit 1, Rows 425-427, 429, including:

- a. \$21,000 to the Alaska Democratic Party,
- b. \$16,000 to the Democratic State Central Committee of LA,

- c. \$29,000 to the Democratic Party of Arkansas, and
- d. \$34,000 to the Nevada State Democratic Party.

193. The DNC reported receiving a total of \$87,000 from three state party committees on November 7, 2016, but none of those committees reported contributing funds to the DNC, *see* Exhibit 1, Rows 427-429, including:

- a. \$29,000 from the Democratic Party of Arkansas,
- b. \$24,000 from the Minnesota Democrat-Farmer-Labor Party, and
- c. \$34,000 from the Nevada State Democratic Party.

WHEREFORE, the Respondent state party political committees violated 52 U.S.C. § 30104 by making inaccurate and/or incomplete statutorily required reports.

**CONCLUSION**

For these reasons, Complainant Committee to Defend the President respectfully requests the Federal Election Commission commence enforcement proceedings against Respondents.

**VERIFICATION**

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.

Respectfully submitted,

---

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EXHIBIT 1

Table with columns: Fund Name, Date, Amount, Recipient, Transfer From, Transfer To, Amount, Date, Recipient, Transfer From, Transfer To, Amount, Date, Recipient, Transfer From, Transfer To, and a list of report IDs. Rows include entries for Hillary Victory Fund from 7/26/2016 to 8/26/2016.

11-001014-0001





EXHIBIT I

Table with columns for Fund Number, Date, Amount, From, To, and a list of report IDs. Rows 211 through 267 show transfers from various state and federal parties to the Alaska Democratic Party, Idaho State Dem. Party, etc.

10047610-10







EXHIBIT I

Entity	Date	Amount	From	To	Report ID	Page	Transaction ID	Report ID	Page	Transaction ID	Report ID	Page	Transaction ID
Hillary Victory Fund	11/7/2016	\$34,000.00	Transfer to Affiliates	Tennessee Democratic Party	FEC-1160811	34	1160811-0001	FEC-1160811	34	1160811-0001	FEC-1160811	34	1160811-0001
Hillary Victory Fund	11/7/2016	\$175,000.00	Transfer to Affiliates	Texas Democratic Party	FEC-1160811	34	1160811-0002	FEC-1160811	34	1160811-0002	FEC-1160811	34	1160811-0002
Hillary Victory Fund	11/7/2016	\$34,000.00	Transfer to Affiliates	Utah State Democratic Committee	FEC-1160811	34	1160811-0003	FEC-1160811	34	1160811-0003	FEC-1160811	34	1160811-0003
Hillary Victory Fund	11/7/2016	\$25,000.00	Transfer to Affiliates	Democratic Executive Committee	FEC-1160811	34	1160811-0004	FEC-1160811	34	1160811-0004	FEC-1160811	34	1160811-0004
Hillary Victory Fund	11/7/2016	\$34,000.00	Transfer to Affiliates	Democratic State Central Committee	FEC-1160811	34	1160811-0005	FEC-1160811	34	1160811-0005	FEC-1160811	34	1160811-0005
Hillary Victory Fund	11/7/2016	\$112,000.00	Transfer to Affiliates	Dem. St. Central Comm.	FEC-1160811	34	1160811-0006	FEC-1160811	34	1160811-0006	FEC-1160811	34	1160811-0006
Hillary Victory Fund	11/7/2016	\$34,000.00	Transfer to Affiliates	Democratic Party of Arkansas	FEC-1160811	34	1160811-0007	FEC-1160811	34	1160811-0007	FEC-1160811	34	1160811-0007
Hillary Victory Fund	11/7/2016	\$204,000.00	Transfer to Affiliates	Miss. DFL Party	FEC-1160811	34	1160811-0008	FEC-1160811	34	1160811-0008	FEC-1160811	34	1160811-0008
Hillary Victory Fund	11/7/2016	\$1,330,000.00	Transfer to Affiliates	NY St. Dem. Party	FEC-1160811	34	1160811-0009	FEC-1160811	34	1160811-0009	FEC-1160811	34	1160811-0009
Hillary Victory Fund	11/7/2016	\$9,000.00	Transfer to Affiliates	Colorado Democratic Party	FEC-1160811	34	1160811-0010	FEC-1160811	34	1160811-0010	FEC-1160811	34	1160811-0010
Hillary Victory Fund	11/7/2016	\$16,000.00	Transfer to Affiliates	Dem. Exec. Comm. FL	FEC-1160811	34	1160811-0011	FEC-1160811	34	1160811-0011	FEC-1160811	34	1160811-0011
Hillary Victory Fund	11/7/2016	\$30,000.00	Transfer to Affiliates	GA Fed. Election Comm.	FEC-1160811	34	1160811-0012	FEC-1160811	34	1160811-0012	FEC-1160811	34	1160811-0012
Hillary Victory Fund	11/7/2016	\$22,000.00	Transfer to Affiliates	Idaho State Party	FEC-1160811	34	1160811-0013	FEC-1160811	34	1160811-0013	FEC-1160811	34	1160811-0013
Hillary Victory Fund	11/7/2016	\$35,000.00	Transfer to Affiliates	Indiana Dem. Cong. Victory Comm.	FEC-1160811	34	1160811-0014	FEC-1160811	34	1160811-0014	FEC-1160811	34	1160811-0014
Hillary Victory Fund	11/7/2016	\$21,000.00	Transfer to Affiliates	NY St. Dem. Central Exec. Comm.	FEC-1160811	34	1160811-0015	FEC-1160811	34	1160811-0015	FEC-1160811	34	1160811-0015
Hillary Victory Fund	11/7/2016	\$20,000.00	Transfer to Affiliates	Idaho Dem. Party	FEC-1160811	34	1160811-0016	FEC-1160811	34	1160811-0016	FEC-1160811	34	1160811-0016
Hillary Victory Fund	11/7/2016	\$24,000.00	Transfer to Affiliates	Mass. Dem. State Comm.	FEC-1160811	34	1160811-0017	FEC-1160811	34	1160811-0017	FEC-1160811	34	1160811-0017
Hillary Victory Fund	11/7/2016	\$22,000.00	Transfer to Affiliates	Michigan Dem. St. Central Comm.	FEC-1160811	34	1160811-0018	FEC-1160811	34	1160811-0018	FEC-1160811	34	1160811-0018
Hillary Victory Fund	11/7/2016	\$21,000.00	Transfer to Affiliates	Mass. Dem. Party	FEC-1160811	34	1160811-0019	FEC-1160811	34	1160811-0019	FEC-1160811	34	1160811-0019
Hillary Victory Fund	11/7/2016	\$40,000.00	Transfer to Affiliates	MD Dem. St. Exec. Comm.	FEC-1160811	34	1160811-0020	FEC-1160811	34	1160811-0020	FEC-1160811	34	1160811-0020
Hillary Victory Fund	11/7/2016	\$21,000.00	Transfer to Affiliates	Art Dem. Party	FEC-1160811	34	1160811-0021	FEC-1160811	34	1160811-0021	FEC-1160811	34	1160811-0021
Hillary Victory Fund	11/7/2016	\$16,000.00	Transfer to Affiliates	NC Dem. Party Fed.	FEC-1160811	34	1160811-0022	FEC-1160811	34	1160811-0022	FEC-1160811	34	1160811-0022
Hillary Victory Fund	11/7/2016	\$25,000.00	Transfer to Affiliates	OH Dem. Party	FEC-1160811	34	1160811-0023	FEC-1160811	34	1160811-0023	FEC-1160811	34	1160811-0023
Hillary Victory Fund	11/7/2016	\$30,000.00	Transfer to Affiliates	Democratic Party of New Mexico	FEC-1160811	34	1160811-0024	FEC-1160811	34	1160811-0024	FEC-1160811	34	1160811-0024
Hillary Victory Fund	11/7/2016	\$25,000.00	Transfer to Affiliates	Democratic Party of Oregon	FEC-1160811	34	1160811-0025	FEC-1160811	34	1160811-0025	FEC-1160811	34	1160811-0025
Hillary Victory Fund	11/7/2016	\$23,000.00	Transfer to Affiliates	Democratic Party of South Carolina	FEC-1160811	34	1160811-0026	FEC-1160811	34	1160811-0026	FEC-1160811	34	1160811-0026
Hillary Victory Fund	11/7/2016	\$29,000.00	Transfer to Affiliates	Democratic Party of Virginia	FEC-1160811	34	1160811-0027	FEC-1160811	34	1160811-0027	FEC-1160811	34	1160811-0027
Hillary Victory Fund	11/7/2016	\$14,000.00	Transfer to Affiliates	Democratic Party of Wisconsin	FEC-1160811	34	1160811-0028	FEC-1160811	34	1160811-0028	FEC-1160811	34	1160811-0028
Hillary Victory Fund	11/7/2016	\$30,000.00	Transfer to Affiliates	State Committee (Delaware)	FEC-1160811	34	1160811-0029	FEC-1160811	34	1160811-0029	FEC-1160811	34	1160811-0029
Hillary Victory Fund	11/7/2016	\$23,000.00	Transfer to Affiliates	Ohio Democratic Party	FEC-1160811	34	1160811-0030	FEC-1160811	34	1160811-0030	FEC-1160811	34	1160811-0030
Hillary Victory Fund	11/7/2016	\$22,000.00	Transfer to Affiliates	Ohio Democratic Party	FEC-1160811	34	1160811-0031	FEC-1160811	34	1160811-0031	FEC-1160811	34	1160811-0031
Hillary Victory Fund	11/7/2016	\$22,000.00	Transfer to Affiliates	Democratic Party of Pennsylvania	FEC-1160811	34	1160811-0032	FEC-1160811	34	1160811-0032	FEC-1160811	34	1160811-0032
Hillary Victory Fund	11/7/2016	\$5,000.00	Transfer to Affiliates	Pennsylvania Democratic Party	FEC-1160811	34	1160811-0033	FEC-1160811	34	1160811-0033	FEC-1160811	34	1160811-0033



EXHIBIT I

Hillary Victory Fund	11/8/2016	\$33,000.00	Transfer to Affiliate	Tennessee Democratic Party	Transfer from Affiliate	11/8/2016	\$33,000.00	Transfer to Affiliate	11/8/2016	\$33,000.00	DNC	Transfer from Affiliate	11/8/2016	\$33,000.00	1. Report ID: FEC-1180811 (A), Page: 37557, Transaction ID: D373668 2. Report ID: FEC-1180811 (A), Page: 316, Transaction ID: 12-24-00028-00026 3. Report ID: FEC-1180811 (A), Page: 334, Transaction ID: 12-24-00028-00026 4. Report ID: FEC-1180811 (A), Page: 2108, Transaction ID: C33309293
Hillary Victory Fund	11/8/2016	\$45,000.00	Transfer to Affiliate	Texas Democratic Party	Transfer from Affiliate	11/8/2016	\$45,000.00	Transfer to Affiliate	11/8/2016	\$45,000.00	DNC	Transfer from Affiliate	11/8/2016	\$45,000.00	1. Report ID: FEC-1180811 (A), Page: 27497, Transaction ID: D373671 2. Report ID: FEC-1180811 (A), Page: 688, Transaction ID: 12-30-00079-00079 3. Report ID: FEC-1180811 (A), Page: 688, Transaction ID: 12-30-00079-00079 4. Report ID: FEC-1180811 (A), Page: 2110, Transaction ID: C33309299
Hillary Victory Fund	11/8/2016	\$34,000.00	Transfer to Affiliate	Utah State Democratic Committee	Transfer from Affiliate	11/8/2016	\$34,000.00	Transfer to Affiliate	11/8/2016	\$34,000.00	DNC	Transfer from Affiliate	11/8/2016	\$34,000.00	1. Report ID: FEC-1180811 (A), Page: 27028, Transaction ID: D373682 2. Report ID: FEC-1180811 (A), Page: 40, Transaction ID: VFFGDMR954 3. Report ID: FEC-1180811 (A), Page: 57, Transaction ID: VFFGDMR954 4. Report ID: FEC-1180811 (A), Page: 2116, Transaction ID: C33309309
Hillary Victory Fund	11/8/2016	\$34,000.00	Transfer to Affiliate	WV State Democratic Executive Committee	Transfer from Affiliate	11/8/2016	\$34,000.00	Transfer to Affiliate	11/8/2016	\$34,000.00	DNC	Transfer from Affiliate	11/8/2016	\$34,000.00	1. Report ID: FEC-1180811 (A), Page: 27028, Transaction ID: D373672 2. Report ID: FEC-1180811 (A), Page: 528, Transaction ID: 12-13-00028-00028 3. Report ID: FEC-1180811 (A), Page: 547, Transaction ID: 12-13-00028-00028 4. Report ID: FEC-1180811 (A), Page: 2119, Transaction ID: C33309316
Hillary Victory Fund	11/8/2016	\$34,000.00	Transfer to Affiliate	WV Democratic State Central Committee	Transfer from Affiliate	11/8/2016	\$34,000.00	Transfer to Affiliate	11/8/2016	\$34,000.00	DNC	Transfer from Affiliate	11/8/2016	\$34,000.00	1. Report ID: FEC-1180811 (A), Page: 27028, Transaction ID: D373673 2. Report ID: FEC-1180811 (A), Page: 302, Transaction ID: VFFGDMR954 3. Report ID: FEC-1180811 (A), Page: 305, Transaction ID: VFFGDMR954 4. Report ID: FEC-1180811 (A), Page: 2123, Transaction ID: C33309322
Hillary Victory Fund	11/8/2016	\$40,000.00	Transfer to Affiliate	Dem. St. Central Com. LA	Transfer from Affiliate			Transfer to Affiliate	11/8/2016	\$40,000.00	DNC	Transfer from Affiliate	11/8/2016	\$40,000.00	1. Report ID: FEC-1180811 (A), Page: 27028, Transaction ID: D373686 2. Report ID: Not Reported, Page N/A, Transaction ID: Not Reported 3. Report ID: FEC-1180811 (A), Page: 310, Transaction ID: VQZAA48327 4. Report ID: FEC-1180811 (A), Page: 2054, Transaction ID: C33308985
Hillary Victory Fund	11/8/2016	\$34,000.00	Transfer to Affiliate	Democratic Party of Arkansas	Transfer from Affiliate			Transfer to Affiliate			DNC	Transfer from Affiliate	11/8/2016	\$34,000.00	1. Report ID: FEC-1180811 (A), Page: 27028, Transaction ID: D373687 2. Report ID: Not Reported, Page N/A, Transaction ID: Not Reported 3. Report ID: Not Reported, Page N/A, Transaction ID: Not Reported 4. Report ID: FEC-1180811 (A), Page: 2020, Transaction ID: C33308993
Hillary Victory Fund	11/8/2016	\$40,000.00	Transfer to Affiliate	NY St. Dem. Party	Transfer from Affiliate			Transfer to Affiliate				Transfer from Affiliate	11/8/2016	\$40,000.00	1. Report ID: FEC-1180811 (A), Page: 27028, Transaction ID: D373690 2. Report ID: Not Reported, Page N/A, Transaction ID: Not Reported 3. Report ID: Not Reported, Page N/A, Transaction ID: Not Reported 4. Report ID: FEC-1180811 (A), Page: 2081, Transaction ID: C33308991
Hillary Victory Fund	11/8/2016	\$61,000.00	Transfer to Affiliate	Indiana Dem. Cong. Victory Comm.	Transfer from Affiliate	11/8/2016	\$61,000.00	Transfer to Affiliate	11/8/2016	\$61,000.00	DNC	Transfer from Affiliate	11/8/2016	\$61,000.00	1. Report ID: FEC-1180811 (A), Page: 27028, Transaction ID: D373691 2. Report ID: FEC-1180811 (A), Page: 256, Transaction ID: C3717029 3. Report ID: FEC-1180811 (A), Page: 684, Transaction ID: D6431929 4. Report ID: FEC-1180811 (A), Page: 2017, Transaction ID: C33308991
Hillary Victory Fund	11/8/2016	\$32,000.00	Transfer to Affiliate	Idaho State Dem. Party	Transfer from Affiliate	11/8/2016	\$32,000.00	Transfer to Affiliate	11/8/2016	\$32,000.00	DNC	Transfer from Affiliate	11/8/2016	\$32,000.00	1. Report ID: FEC-1180811 (A), Page: 27028, Transaction ID: D373692 2. Report ID: FEC-1180811 (A), Page: 645, Transaction ID: VFFGDMR956 3. Report ID: FEC-1180811 (A), Page: 678, Transaction ID: VFFGDMR956 4. Report ID: FEC-1180811 (A), Page: 2045, Transaction ID: C33308991
Hillary Victory Fund	11/8/2016	\$32,000.00	Transfer to Affiliate	Madre Dem. Party	Transfer from Affiliate	11/8/2016	\$32,000.00	Transfer to Affiliate	11/8/2016	\$32,000.00	DNC	Transfer from Affiliate	11/8/2016	\$32,000.00	1. Report ID: FEC-1180811 (A), Page: 27028, Transaction ID: D373693 2. Report ID: FEC-1180811 (A), Page: 444, Transaction ID: 12-13-00028-00028 3. Report ID: FEC-1180811 (A), Page: 451, Transaction ID: 12-13-00028-00028 4. Report ID: FEC-1180811 (A), Page: 2053, Transaction ID: C33308991
Hillary Victory Fund	11/8/2016	\$34,000.00	Transfer to Affiliate	Mass. Dem. St. Comm.	Transfer from Affiliate	11/8/2016	\$34,000.00	Transfer to Affiliate	11/8/2016	\$34,000.00	DNC	Transfer from Affiliate	11/8/2016	\$34,000.00	1. Report ID: FEC-1180811 (A), Page: 27028, Transaction ID: D373694 2. Report ID: FEC-1180811 (A), Page: 426, Transaction ID: VFFGDMR957 3. Report ID: FEC-1180811 (A), Page: 432, Transaction ID: VFFGDMR957 4. Report ID: FEC-1180811 (A), Page: 2054, Transaction ID: C33308991
Hillary Victory Fund	11/8/2016	\$49,000.00	Transfer to Affiliate	NC Dem. Party Fed.	Transfer from Affiliate	11/8/2016	\$49,000.00	Transfer to Affiliate	11/8/2016	\$49,000.00	DNC	Transfer from Affiliate	11/8/2016	\$49,000.00	1. Report ID: FEC-1180811 (A), Page: 27028, Transaction ID: D373695 2. Report ID: FEC-1180811 (A), Page: 559, Transaction ID: 12-48-00021-00021 3. Report ID: FEC-1180811 (A), Page: 575, Transaction ID: 12-48-00021-00021 4. Report ID: FEC-1180811 (A), Page: 2054, Transaction ID: C33308991
Hillary Victory Fund	11/8/2016	\$36,000.00	Transfer to Affiliate	Democratic Party of Wisconsin	Transfer from Affiliate	11/8/2016	\$36,000.00	Transfer to Affiliate	11/8/2016	\$36,000.00	DNC	Transfer from Affiliate	11/8/2016	\$36,000.00	1. Report ID: FEC-1180811 (A), Page: 27011, Transaction ID: D373696 2. Report ID: FEC-1180811 (A), Page: 206, Transaction ID: C1048762 3. Report ID: FEC-1180811 (A), Page: 1643, Transaction ID: D651760 4. Report ID: FEC-1180811 (A), Page: 2074, Transaction ID: C33308991
Hillary Victory Fund	11/8/2016	\$39,000.00	Transfer to Affiliate	Iowa Democratic Party	Transfer from Affiliate	11/8/2016	\$39,000.00	Transfer to Affiliate	11/8/2016	\$39,000.00	DNC	Transfer from Affiliate	11/8/2016	\$39,000.00	1. Report ID: FEC-1180811 (A), Page: 27012, Transaction ID: D373697 2. Report ID: FEC-1180811 (A), Page: 439, Transaction ID: D642095 3. Report ID: FEC-1180811 (A), Page: 504, Transaction ID: D642095 4. Report ID: FEC-1180811 (A), Page: 2054, Transaction ID: C33308991

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**EXHIBIT 2**

Row	Recipient 1	Date	Amount	Outgoing Function →	Recipient 2	Report ID/Page #/Transaction ID
1	DNC	8/15/2016	\$ 178,811.83	Party Coordinated Expenditure	Mission Control Inc	Report ID: FEC-1164567 (A1), Page: 4692, Transaction ID: SF-305825
2	DNC	8/15/2016	\$ 406.00	Party Coordinated Expenditure	DNC Services Corp.	Report ID: FEC-1164567 (A1), Page: 4692, Transaction ID: SF-297027
3	DNC	8/31/2016	\$ 2,531.75	Party Coordinated Expenditure	Mack Sumner Communications	Report ID: FEC-1164567 (A1), Page: 4692, Transaction ID: SF-296044
4	DNC	8/31/2016	\$ 1,382.00	Party Coordinated Expenditure	Mission Control Inc	Report ID: FEC-1164567 (A1), Page: 4693, Transaction ID: SF-296046
5	DNC	8/31/2016	\$ 406.00	Party Coordinated Expenditure	DNC Services Corp.	Report ID: FEC-1164567 (A1), Page: 4693, Transaction ID: SF-297030
6	DNC	9/14/2016	\$ 1,408.59	Party Coordinated Expenditure	Resonance Campaigns	Report ID: FEC-1164578 (A1), Page: 4982, Transaction ID: SF-296315
7	DNC	9/14/2016	\$ 1,951.54	Party Coordinated Expenditure	Mission Control Inc	Report ID: FEC-1164578 (A1), Page: 4982, Transaction ID: SF-296308
8	DNC	9/16/2016	\$ 406.00	Party Coordinated Expenditure	DNC Services Corp.	Report ID: FEC-1164578 (A1), Page: 4982, Transaction ID: SF-298983
9	DNC	9/26/2016	\$ 318,200.00	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164578 (A1), Page: 4983, Transaction ID: SF-297358
10	DNC	9/30/2016	\$ 406.00	Party Coordinated Expenditure	DNC Services Corp.	Report ID: FEC-1164578 (A1), Page: 4983, Transaction ID: SF-298985
11	DNC	9/30/2016	\$ 318,200.00	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164578 (A1), Page: 4983, Transaction ID: SF-297897
12	DNC	10/7/2016	\$ 57,678.00	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164580 (A1), Page: 1731, Transaction ID: SF-298141
13	DNC	10/11/2016	\$ 30,000.00	Party Coordinated Expenditure	Markham Group, LLC	Report ID: FEC-1164580 (A1), Page: 1731, Transaction ID: SF-298177
14	DNC	10/14/2016	\$ 19,468.50	Party Coordinated Expenditure	DNC Services Corp.	Report ID: FEC-1164580 (A1), Page: 1731, Transaction ID: SF-299333
15	DNC	10/14/2016	\$ 4,645,717.35	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164580 (A1), Page: 1732, Transaction ID: SF-298801
16	DNC	10/14/2016	\$ 57,678.00	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164580 (A1), Page: 1732, Transaction ID: SF-298802
17	DNC	10/18/2016	\$ 585,656.00	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164580 (A1), Page: 1732, Transaction ID: SF-298850
18	DNC	10/19/2016	\$ 17,750.00	Party Coordinated Expenditure	David Binder Research	Report ID: FEC-1164580 (A1), Page: 1733, Transaction ID: SF-298958
19	DNC	10/21/2016	\$ 4,934,432.94	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164593 (A1), Page: 16688, Transaction ID: SF-299056
20	DNC	10/26/2016	\$ 24,295.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16688, Transaction ID: SF-299297
21	DNC	10/26/2016	\$ 24,408.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16688, Transaction ID: SF-299298
22	DNC	10/26/2016	\$ 50,467.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16689, Transaction ID: SF-301797
23	DNC	10/26/2016	\$ 54,126.97	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16689, Transaction ID: SF-299302
24	DNC	10/26/2016	\$ 43,101.00	Party Coordinated Expenditure	Anzalone Liszt Research, Inc.	Report ID: FEC-1164593 (A1), Page: 16689, Transaction ID: SF-299267
25	DNC	10/26/2016	\$ 152,250.00	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164593 (A1), Page: 16690, Transaction ID: SF-299291
26	DNC	10/28/2016	\$ 37,500.00	Party Coordinated Expenditure	David Binder Research	Report ID: FEC-1164593 (A1), Page: 16690, Transaction ID: SF-299424
27	DNC	10/28/2016	\$ 17,750.00	Party Coordinated Expenditure	David Binder Research	Report ID: FEC-1164593 (A1), Page: 16690, Transaction ID: SF-299425
28	DNC	10/28/2016	\$ 44,225.00	Party Coordinated Expenditure	David Binder Research	Report ID: FEC-1164593 (A1), Page: 16691, Transaction ID: SF-299426
29	DNC	10/28/2016	\$ 4,915,203.33	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164593 (A1), Page: 16691, Transaction ID: SF-299386
30	DNC	10/31/2016	\$ 19,468.50	Party Coordinated Expenditure	DNC Services Corp.	Report ID: FEC-1164593 (A1), Page: 16691, Transaction ID: SF-301799
31	DNC	10/31/2016	\$ 20,175.00	Party Coordinated Expenditure	Latino Decisions	Report ID: FEC-1164593 (A1), Page: 16692, Transaction ID: SF-299985
32	DNC	10/31/2016	\$ 600.00	Party Coordinated Expenditure	Latino Decisions	Report ID: FEC-1164593 (A1), Page: 16692, Transaction ID: SF-299986
33	DNC	10/31/2016	\$ 20,000.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16692, Transaction ID: SF-300010
34	DNC	10/31/2016	\$ 31,695.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16693, Transaction ID: SF-300011
35	DNC	10/31/2016	\$ 31,250.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16693, Transaction ID: SF-300012
36	DNC	10/31/2016	\$ 17,967.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16693, Transaction ID: SF-300013

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EXHIBIT 2

37	DNC	10/31/2016	\$ 173,894.27	Party Coordinated Expenditure	The Pivot Group	Report ID: FEC-1164593 (A1), Page: 16694, Transaction ID: SF-299988
38	DNC	10/31/2016	\$ 137,284.95	Party Coordinated Expenditure	The Pivot Group	Report ID: FEC-1164593 (A1), Page: 16694, Transaction ID: SF-299989
39	DNC	10/31/2016	\$ 17,750.00	Party Coordinated Expenditure	David Binder Research	Report ID: FEC-1164593 (A1), Page: 16694, Transaction ID: SF-300016
40	DNC	10/31/2016	\$ 944.95	Party Coordinated Expenditure	Anzalone Liszt Research, Inc.	Report ID: FEC-1164593 (A1), Page: 16695, Transaction ID: SF-299991
41	DNC	10/31/2016	\$ 22,826.00	Party Coordinated Expenditure	Anzalone Liszt Research, Inc.	Report ID: FEC-1164593 (A1), Page: 16695, Transaction ID: SF-299992
42	DNC	10/31/2016	\$ 20,700.00	Party Coordinated Expenditure	Anzalone Liszt Research, Inc.	Report ID: FEC-1164593 (A1), Page: 16695, Transaction ID: SF-299994
43	DNC	11/1/2016	\$ 411,600.00	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164593 (A1), Page: 16696, Transaction ID: SF-300089
44	DNC	11/2/2016	\$ 722,500.00	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164593 (A1), Page: 16696, Transaction ID: SF-300118
45	DNC	11/2/2016	\$ 500,000.00	Party Coordinated Expenditure	Markham Productions, LLC	Report ID: FEC-1164593 (A1), Page: 16696, Transaction ID: SF-300119
46	DNC	11/4/2016	\$ 28,800.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16698, Transaction ID: SF-300183
47	DNC	11/4/2016	\$ 637.00	Party Coordinated Expenditure	Anzalone Liszt Research, Inc.	Report ID: FEC-1164593 (A1), Page: 16697, Transaction ID: SF-300181
48	DNC	11/4/2016	\$ 1,076,125.50	Party Coordinated Expenditure	GMMB	Report ID: FEC-1164593 (A1), Page: 16697, Transaction ID: SF-300208
49	DNC	11/4/2016	\$ 17,750.00	Party Coordinated Expenditure	David Binder Research	Report ID: FEC-1164593 (A1), Page: 16697, Transaction ID: SF-300191
50	DNC	11/4/2016	\$ 24,915.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16698, Transaction ID: SF-300185
51	DNC	11/4/2016	\$ 33,625.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16698, Transaction ID: SF-300187
52	DNC	11/8/2016	\$ 28,800.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16699, Transaction ID: SF-300396
53	DNC	11/8/2016	\$ 23,940.00	Party Coordinated Expenditure	Benenson Strategy Group	Report ID: FEC-1164593 (A1), Page: 16699, Transaction ID: SF-300397
54	DNC	11/10/2016	\$ 135,224.08	Party Coordinated Expenditure	Air Partner	Report ID: FEC-1164593 (A1), Page: 16699, Transaction ID: SF-300438
55	DNC	11/10/2016	\$ 480,612.60	Party Coordinated Expenditure	Air Partner	Report ID: FEC-1164593 (A1), Page: 16700, Transaction ID: SF-300439
56	DNC	11/10/2016	\$ 2,250,000.00	Party Coordinated Expenditure	Markham Productions, LLC	Report ID: FEC-1164593 (A1), Page: 16700, Transaction ID: SF-300440
57	DNC	11/14/2016	\$ 21,012.52	Party Coordinated Expenditure	PDQ Printing of Las Vegas	Report ID: FEC-1164593 (A1), Page: 16700, Transaction ID: SF-300512
58	DNC	11/14/2016	\$ 10,617.66	Party Coordinated Expenditure	PDQ Printing of Las Vegas	Report ID: FEC-1164593 (A1), Page: 16701, Transaction ID: SF-300513
59	DNC	11/28/2016	\$ 340.00	Party Coordinated Expenditure	Anzalone Liszt Research, Inc.	Report ID: FEC-1164593 (A1), Page: 16701, Transaction ID: SF-301444

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