

OFFICE OF  
GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER  
1411 K Street NW, Suite 1400  
Washington, DC 20005  
(202) 736-2200

MARGARET CHRIST  
1411 K Street NW, Suite 1400  
Washington, DC 20005  
(202) 736-2200

v.

MUR No.

7474

PRINCIPLES FIRST, INC.  
Randall Lee Pullen, Treasurer  
4915 E. Lafayette, Suite 106  
Phoenix, AZ 85018

COMPLAINT

1. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Principles First, Inc. (ID: C00679449) ("Principles First") has violated the Federal Election Campaign Act ("FECA"), 52 U.S.C. § 30104, *et seq.*
2. In the weeks before Montana's June 5, 2018 primary, Principles First spent at least \$49,350 on at least 127 television ads expressly advocating against the election of Matt Rosendale, a candidate seeking the Republican nomination for Montana's U.S. Senate seat, yet failed to file timely and accurate independent expenditure reports, depriving complainants and Montana voters of information to which they were legally entitled.
3. "If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [FECA] . . . [t]he Commission *shall* make an investigation of such alleged violation . . . ." 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

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4. Campaign Legal Center (“CLC”) is a nonpartisan, nonprofit 501(c)(3) organization whose mission is to protect and strengthen the U.S. democratic process through litigation and other legal advocacy. CLC participates in judicial and administrative matters throughout the nation regarding campaign finance, voting rights, redistricting, and government ethics issues.

#### FACTS

5. Principles First, Inc. (“Principles First”) also known as Principles First PAC, is an independent expenditure-only political action committee (i.e., a “super PAC”) that was active in Montana’s U.S. Senate primary election, which was held on June 5, 2018.<sup>1</sup>
6. Matt Rosendale is a Republican candidate seeking election to the U.S. Senate from Montana.<sup>2</sup>
7. On May 22, 2018, Principles First began running \$26,625 in broadcast ads on three Montana stations—KPAX-TV/KAJ-TV, KECI, and KTMF—according to Federal Communications Commission (“FCC”) records.<sup>3</sup> The political ad file accompanying one of the contracts described the ad as relating to the “U.S. House race for Montana primary.”<sup>4</sup>
8. A copy of the ad posted to the Advertising Analytics platform AdMo shows that the ad expressly advocated against Rosendale’s election by urging viewers: “On June 5<sup>th</sup> Vote NO! on Maryland Matt Rosendale.”<sup>5</sup> The ad concluded with the message: “Principles First is

<sup>1</sup> See 2018 Congressional Pre-Election Reporting Dates, FEC.gov [https://transition.fec.gov/info/charts\\_primary\\_dates\\_2018.shtml#anchor5](https://transition.fec.gov/info/charts_primary_dates_2018.shtml#anchor5).

<sup>2</sup> Matt Rosendale for Montana, Statement of Candidacy, FEC Form 2, at 1 (amended May 11, 2018), <http://docquery.fec.gov/pdf/618/201805110200366618/201805110200366618.pdf>.

<sup>3</sup> See Exhibits B-E. The contracts with KPAJ and KECI were executed on May 18, 2018. See Exhibit C at 1; Exhibit D at 3-4.

<sup>4</sup> Exhibit B at 2.

<sup>5</sup> Principles First PAC, *Maryland Matt*, AdMO, <https://host2.advertisinganalyticsllc.com/admo/#/viewer/7b838c16-e08f-4676-9160-75e0c9bb55ea/cGVkc8uc3VhcmlV6OGdibWluY291> (last visited June 20, 2018); see also @Robillard, Twitter (Mar. 23, 2018), <https://twitter.com/robillard/status/999336801318920192?lang=en> (Politico reporter Kevin Robillard tweeting on May 23 that “A new group, Principles First PAC, is on the air in #MTSen, attacking GOP frontrunner @MattforMontana as “Maryland Matt,” with a link to the ad).

responsible for the content of this advertising. Paid for by Principles First and not authorized by any candidate or candidate's committee."<sup>6</sup>

9. On May 23, 2018, Principles First filed a statement of organization with the Commission.<sup>7</sup> The statement of organization designated Randall Lee Pullen as the committee's treasurer, listed a Scottsdale, Arizona address for the committee, and informed the Commission that it intended to raise unlimited funds and make independent expenditures.<sup>8</sup>
10. Also on May 23, 2018, an Arizona-based attorney for Principles First sent a letter to the station manager of KTMF ABC/FOX News in Missoula, Montana, responding to a cease-and-desist letter from Matt Rosendale for Montana.<sup>9</sup> The Principles First letter argued that its ad describing Rosendale as "Maryland Matt" did not contain a factually inaccurate voiceover message; rather, the letter insisted "[i]t is clear that the advertisement in question is not misleading, it is not false, and it does not materially misrepresent any facts surrounding this issue."<sup>10</sup>
11. On May 25, 2018, *MTN News* reported that Principles First, a "little-known group," had purchased \$50,000 in airtime for a TV ad attacking U.S. Senate candidate Matt Rosendale.<sup>11</sup> As *MTN News* described:

The ad refers to Rosendale as "Maryland Matt" – a pejorative often used by Democrats to label him as a recent arrival to the state – and says he signed legal documents "affirming he's a Maryland citizen." Rosendale moved from Maryland to Montana in 2002.

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<sup>6</sup> *Id.*

<sup>7</sup> Principles First, Inc., Statement of Organization, FEC Form 1, at 1 (filed May 23, 2018), <http://docquery.fec.gov/pdf/648/201805239113318648/201805239113318648.pdf>.

<sup>8</sup> *Id.* at 1, 5.

<sup>9</sup> Exhibit A at 1-2.

<sup>10</sup> *Id.*

<sup>11</sup> Mike Dennison, *GOP Senate primary: obscure group dings Rosendale; Club for Growth ups the ante against Fagg*, MTN NEWS (May 25, 2018), <http://www.krtv.com/story/38279181/in-gop-senate-primary-obscure-group-dings-rosendale-club-for-growth-ups-ante-against-fagg>.

Rosendale's campaign denounced the ad as "blatantly false," saying that a Maryland title company has said, in writing, that the 2015 land-sale document indicating Rosendale is a resident of Maryland is a mistake that it made.

Principles First PAC is not registered with the Federal Election Commission and a media buyer for the group did not return a telephone message from MTN.<sup>12</sup>

12. On May 30, 2018, Principles First spent an additional \$22,725 on broadcast ads on the same three Montana stations, KPAX-TV/KAJ-TV, KECL, and KTMF, according to FCC records.<sup>13</sup>
13. The officer listed on Principles First's FCC documents appears to be the treasurer listed on Principles First's reports filed with the Commission.<sup>14</sup>
14. On June 19, 2018, Principles First filed two separate amendments to its Statement of Organization. The first amendment reflected zero changes from the original.<sup>15</sup> The second amendment changed the committee's email and mailing addresses, and removed the text appearing on the last page of the two previous versions saying that the committee intended to raise unlimited funds for independent expenditures.<sup>16</sup>
15. On July 7, 2018, Principles First filed a July Quarterly report disclosing \$90,000 in receipts from two contributors: \$40,000 from Alliance for a Better Tomorrow, Inc. on May 15, 2018, and \$50,000 from Almon Blain on May 16, 2018.<sup>17</sup> Schedule E of the report disclosed

<sup>12</sup> *Id.*

<sup>13</sup> See Exhibits F-H.

<sup>14</sup> The "Agreement Form[s] for Non-Candidate/Issue Advertisements" included in this set of filings indicate that this is the same group that registered with the FEC on May 23, 2018, given that Randall, or "Randy," Pullen is listed in filings with both Commissions. Compare Principles First, Inc., Statement of Organization, *supra* n. 7, with Exhibit B at 2.

<sup>15</sup> Compare Principles First, Inc., Statement of Organization, Amendment 1, FEC-1239149, FEC Form 1 (amended June 19, 2018), <http://docquery.fec.gov/pdf/345/201806199113758345/201806199113758345.pdf>, with Principles First, Inc., Statement of Organization, Original, FEC Form 1 (filed May 23, 2018), *supra* n. 7.

<sup>16</sup> Compare Principles First, Inc., Statement of Organization, Amendment 2, Current Version FEC-1239170, FEC Form 1, (amended June 19, 2018), <http://docquery.fec.gov/pdf/587/201806199113758587/201806199113758587.pdf>, with Principles First, Inc., Statement of Organization, Amendment 1, FEC Form 1, (filed June 19, 2018), *supra* n. 15.

<sup>17</sup> Principles First, Inc., July Quarterly Report, FEC Form 3X, at 7 (filed July 7, 2018), <http://docquery.fec.gov/pdf/451/201807079115247451/201807079115247451.pdf>. The July Quarterly includes a note stating "This fil (sic) was created with the help of Kaitlan at the FEC for the quarterly report. Did not need to file monthly report (DC2). Once the 7/15/18 report is filed, will file the 24 hour late reports." *Id.* at 6.

\$65,150 in independent expenditures supporting U.S. Senate candidate Russell Fagg: \$60,000 in TV ads and \$5,150 in digital ads disseminated on May 18, 2018.<sup>18</sup> Also on July 7, 2018, Principles First filed a 24-hour independent expenditure report disclosing those same independent expenditures.<sup>19</sup>

#### SUMMARY OF THE LAW

16. A political committee must comply with the organizational and recordkeeping requirements of 52 U.S.C. § 30102, and must file periodic disclosure reports, either on a monthly or quarterly basis, of its receipts and disbursements, 52 U.S.C. § 30104(a)(4)(A)-(B).
17. Independent expenditures are expenditures that expressly advocate the election or defeat of a clearly identified federal candidate and are not coordinated with such candidate or political party. 52 U.S.C. § 30101(17); 11 C.F.R. § 100.16(a).
18. Every person that makes independent expenditures aggregating \$1,000 or more less than 20 days, but more than 24 hours, before the date of an election must report the expenditures within 24 hours. 52 U.S.C. § 30104(g)(1)(A); 11 C.F.R. §§ 104.4(c), 104.5(g)(2), 109.10(d). The person must file an additional 24-hour report each time the person makes subsequent independent expenditures in that election aggregating \$1,000 or more. *Id.*
19. Such reports must disclose information regarding the committee's independent expenditures, including the date, amount, and purpose of the independent expenditure and a statement indicates whether it is in support of, or in opposition to, a candidate, as well as the name and office sought by that candidate, and the identity of any person to whom over \$200 was

<sup>18</sup> *Id.* at 9.

<sup>19</sup> Principles First, Inc., 24/48 Hour Report of Independent Expenditures, Schedule E (filed July 7, 2018), <http://docquery.fec.gov/pdf/450/201807079115247450/201807079115247450.pdf>.

disbursed in connection with the independent expenditure. 52 U.S.C. § 30104(b)(6)(B)(iii); 11 C.F.R. §§ 104.4(c), 104.3(b)(3)(vii), 109.10(d)-(e).

20. A political committee that makes independent expenditures must itemize them on its periodic reports. 52 U.S.C. §§ 30104(b)(4)(H)(iii), (6)(B)(iii); 11 C.F.R. § 104.4(a).
21. The Supreme Court has repeatedly recognized the importance of campaign finance disclosure to informing the electorate. *See, e.g., Citizens United v. FEC*, 558 U.S. 310, 369 (2010) (discussing the public interest in “knowing who is speaking about a candidate shortly before an election.”).

#### CAUSES OF ACTION

##### I. PRINCIPLES FIRST, INC. FAILED TO REPORT INDEPENDENT EXPENDITURES

22. Published reports and FCC records indicate that Principles First spent at least \$49,350 to air at least 127 broadcast advertisements in Montana that expressly advocated against the election of Montana Congressional candidate Matt Rosendale (“Vote NO! on Maryland Matt Rosendale”) and did so within 20 days before the June 5th election.<sup>20</sup> These advertisements constituted independent expenditures as that phrase is defined in FECA. 52 U.S.C. § 30101(17); 11 C.F.R. § 100.16(a).
23. According to FCC records, Principles First spent:
  - a. \$16,100 on 30 ad spots that ran May 22, 2018 through May 29, 2018 on the KPAX-TV/KAJ-TV station in Missoula, Montana;<sup>21</sup>

<sup>20</sup> See Political Files, Principles First, Federal Communications Commission, [https://publicfiles.fcc.gov/find/%22principles%20first%22/page-offset-0/order-oldest/filter-\[\]/files](https://publicfiles.fcc.gov/find/%22principles%20first%22/page-offset-0/order-oldest/filter-[]/files) (last visited June 21, 2018); see also Principles First PAC, *Maryland Matt*, *supra* note 5.

<sup>21</sup> Exhibit C at 3.

- b. \$9,650 on 25 ad spots that ran May 22, 2018 through May 29, 2018 on the KECI station in Missoula, Montana;<sup>22</sup>
- c. \$875 on 12 ad spots that ran May 22, 2018 through May 29, 2018 on the KTMF station in Missoula, Montana;<sup>23</sup>
- d. \$13,400 on 26 ad spots that ran May 30, 2018 through June 5, 2018 on the KPAX-TV/KAJ-TV station in Missoula, Montana;<sup>24</sup>
- e. \$8,700 on 24 ad spots that ran May 30, 2018 through June 5, 2018 on the KTMF station in Missoula, Montana;<sup>25</sup> and
- f. \$625 on 10 spots that ran May 30, 2018 through June 5, 2018 on the KTMF station in Missoula, Montana.<sup>26</sup>
24. A political committee that makes independent expenditures aggregating \$1,000 or more less than 20 days before the date of an election must report the expenditures within 24 hours, and file additional 24-hour reports each time subsequent independent expenditures aggregate an

<sup>22</sup> Exhibit D at 1-4. On the attached "Agreement Form for Non-Candidate/Issue Advertisements," the "No" box is selected in response to the question, "Does the programming (in whole or in part) communicate 'a message relating to any political matter of national importance?'" *Id.* at 6. However, the preceding contract displays the "Political Issue" designation in the "Product" field, *id.* at 1, 2, and complainants are not aware of any evidence to suggest Principles First was running ads during that period that were not tied to the Montana U.S. Senate race.

<sup>23</sup> Exhibit E at 1-3. A previous version of this filing, dated three days earlier, included an attached agreement form answering "No" to the question, "Does the programming (in whole or in part) communicate 'a message relating to any political matter of national importance?'" However, the most recent version available in the FCC files omitted that attachment. The exhibits cited in this complaint reflect the most recent versions of the records on file with the FCC.

<sup>24</sup> Exhibit F at 3.

<sup>25</sup> Exhibit G at 1-4. On the attached "Agreement Form for Non-Candidate/Issue Advertisements," the "No" box is selected in response to the question, "Does the programming (in whole or in part) communicate 'a message relating to any political matter of national importance?'" *Id.* at 6. However, the preceding contract displays the "Political Issue" designation in the "Product" field, *id.* at 1, 2, and there is no reporting nor other evidence to suggest Principles First was running ads during that period that were not tied to the Montana U.S. Senate race.

<sup>26</sup> Exhibit H at 1-4. On the attached "Agreement Form for Non-Candidate/Issue Advertisements," the "No" box is selected in response to the question, "Does the programming (in whole or in part) communicate 'a message relating to any political matter of national importance?'" *Id.* at 6. However, the preceding order displays the "Political/Vote" designation in the "Con Type" field, *id.* at 3, and there is no reporting nor other evidence to suggest Principles First was running ads during that period that were not tied to the Montana U.S. Senate race.

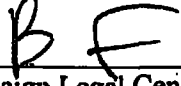
additional \$1,000. 52 U.S.C. § 30104(g)(1)(A); 11 C.F.R. §§ 104.4(c), 104.5(g)(2), 109.10(d).

25. On July 7, 2018, several weeks after the independent expenditures were disseminated, Principles First filed two 24-hour independent expenditure reports: one disclosing \$60,000 for "TV ad Montana," and one disclosing \$5,150 for "Digital Ad."<sup>27</sup>
26. By failing to timely file these independent expenditure reports for its spending on communications expressly advocating against the election of Matt Rosendale, Principles First repeatedly violated 52 U.S.C. § 30104(g)(1).<sup>28</sup>

#### PRAYER FOR RELIEF

27. Wherefore, the Commission should find reason to believe that Principles First, Inc. has violated 52 U.S.C. § 30101 *et seq.*, and the Commission should conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
28. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with the FECA.

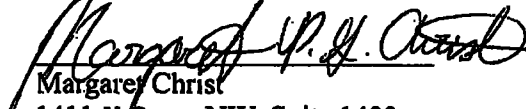
Respectfully submitted,

  
\_\_\_\_\_  
Campaign Legal Center, by  
Brendan M. Fischer  
1411 K Street, NW, Suite 1400

<sup>27</sup> Principles First, Inc., 24/48 Hour Report of Independent Expenditures, *supra* note 19. The \$60,000 disbursement for TV ads was dated May 17, 2018. *Id.*

<sup>28</sup> The close-of-books for Montana's pre-primary report was May 16, 2018, and that report was due May 24, 2018. See 2018 Congressional Pre-Election Reporting Dates, *supra* note 1. As a political committee that files quarterly, Principles First is required to file a pre-primary report for any primary election where it makes an expenditure in support of or against a candidate. 52 U.S.C. § 30104(a)(4)(A); 11 C.F.R. § 104.5(c)(1). If Principles First made any expenditures in advance of May 16, 2018, it may have additionally violated Section 30104(a)(4)(A) by failing to file a pre-primary report.

Washington, DC 20005  
(202) 736-2200

  
Margaret Christ  
1411 K Street NW, Suite 1400  
Washington, DC 20005  
(202) 736-2200

Brendan M. Fischer  
Campaign Legal Center  
1411 K Street, NW, Suite 1400  
Washington, DC 20002  
Counsel to the Campaign Legal Center,  
Margaret Christ

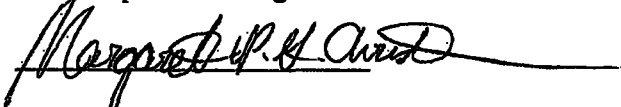
August 9, 2018

VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

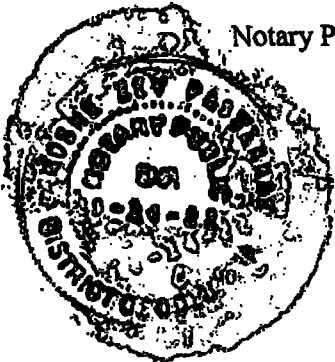
For Complainant Margaret Christ

  
Margaret Christ

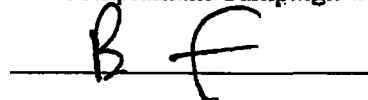
Sworn to and subscribed before me this 9 day of August 2018.

  
\_\_\_\_\_

Notary Public



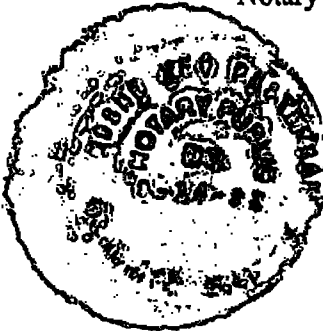
For Complainant Campaign Legal Center

  
Brendan M. Fischer

Sworn to and subscribed before me this 9 day of August 2018.

  
\_\_\_\_\_

Notary Public



# EXHIBIT A

10-1000-1-10-10

THE LAW OFFICE OF  
**DAVID JAMESON KEPHART, PLLC**

1840 EAST WARNER ROAD, SUITE 102 - TEMPE, ARIZONA 85284

(480) 456-0025 OFFICE

DAVID@KEPHARTLAW.COM

(480) 718-7833 FACSIMILE

May 23, 2018

Thomas Ciprari  
Station Manager  
KTMF ABC/FOX News  
2200 Stephens Avenue  
Missoula, Montana 59801-7904

***Re: Response to Cease and Desist False Advertisement Regarding Matt Rosendale***

My firm represents Principles First, Inc. regarding the false claim lodged by Mr. Rosendale and his Campaign against Principles First's advertisement titled "Wrong for Montana."

Mr. Rosendale and his Campaign are attempting to silence Principles First by falsely claiming that their advertisement "Wrong for Montana" is deliberately misleading, false, or that it materially misrepresents facts. The efforts of Mr. Rosendale and his Campaign to trounce the First Amendment right of Principles First by making such false allegations is very troubling and your station should reject their baseless efforts and allow "Wrong for Montana" to remain on the air.

The voiceover portion of "Wrong for Montana" that has been called into question states:

On the Maryland Catch: Montana Senate candidate, "Maryland" Matt Rosendale, hits a big snag by signing legal documents affirming he is a Maryland citizen...

The voiceover is factually accurate. The issue of whether Mr. Rosendale falsely and/or erroneously signed a Certification of Exemption from Withholding Upon Disposition of Maryland Real Estate Affidavit of Residence or Principal Residence ("WH-AR") has been a recent issue that his campaign has been forced to explain.

It is beyond disputed that in 2015, Mr. Rosendale signed the WH-AR in question. The form provides for three Reasons of Exemptions, 1) the transferor is a resident of the State of Maryland, 2) the transferor is a resident entity per Maryland law and the person signing the form is an agent thereof, or 3) the transferor is no longer a Maryland residence, but the property is their principal address.

The first Reason for Exemption is checked, and the form is signed by Mr. Rosendale with the declaration that "[u]nder penalty of perjury, I certify that I have examined this declaration and that, to the best of my knowledge, it is true, correct, and complete."

Once this document was uncovered, various media outlets have been covering this very issue which would certainly qualify as Mr. Rosendale's campaign hitting a "big snag." As an example, Don Pogreba recently wrote in the Montana Post:

....there are three points that seem awfully important for Rosendale to answer:

- 1) Shouldn't he, as a real estate developer, have known the details about a real estate deal?
- 2) Given that the only reason someone would sign this document was to claim a tax break, why did he do it?
- 3) Shouldn't the people of Montana be able to expect that a Senator or State auditor would be careful about reading and signing a document before committing perjury?

Mr. Pogreba's points are very salient. At the time of signing the WH-AR, Mr. Rosendale was not a resident of the state of Maryland. Though much has been made over whether the Reason for Exemption was checked *before* or *after* Mr. Rosendale signed the form, this overlooks a significant point -- Mr. Rosendale should have never signed the form in the first place. Mr. Rosendale was not a resident of Maryland, he was not acting as an agent of a resident entity, and the property in question was not his principal residence.

I can appreciate that closing on a property can be a daunting and even intimidating task for an average person, but someone with the background and professional pedigree of Mr. Rosendale should have known not to sign the form.

Mr. Rosendale's failure to perform an even cursory review of significant legal/transactional documents based on the purported excuse that he was given a "big packet" and that he "signed where flagged" is unconvincing. This issue clearly calls into question his fitness as a candidate and his constituents deserve to be informed accordingly.

It is clear that the advertisement in question is not misleading, it is not false, and it does not materially misrepresent any facts surrounding this issue. Your station should reject the wrongful attempt by Mr. Rosendale and his Campaign to silence Principles First and the advertisement "Wrong for Montana" should remain on the air. The First Amendment requires no less.

Thank you,

/s/

David J. Kephart  
Attorney



**GROUP**  
*further*

**CHRIS K. GOBER**  
**THE GOBER GROUP PLLC**

**PO BOX 341016**  
**AUSTIN, TX 78734**

**512.354.1783**  
**CG@GOBERGROUP.COM**

**May 22, 2018**

**VIA ELECTRONIC MAIL**

**Katie Delany**  
**KTMF/NTMF**  
**2200 Stephens Avenue, Missoula, MT 59801**  
**katie.delany@abcfoxmontana.com**

**Re: Cease and Desist False Advertisement Regarding Matt Rosendale.**

**Dear Ms. Delany:**

Our firm represents Matt Rosendale for Montana, the principal campaign committee of Matt Rosendale, candidate for the United States Senate from Montana. It has come to our attention that Principles First PAC has purchased air time on your network to run a negative advertisement titled "Wrong for Montana" targeting Matt Rosendale ("the Advertisement"). The Advertisement blatantly misrepresents Mr. Rosendale's residency.

We respectfully demand that your network refuse to air the Advertisement and that no similar airings of this misleading content be allowed on your network. Only your refusal to further disseminate this deliberately misleading and false Advertisement will satisfy your network's obligation to prevent the distribution of deceptive content to your audience. Any continued delivery of this content will make your network an active participant in distributing material misrepresentations of fact when our voters are owed true, honest, and fair information about their candidates.

The Advertisement claims that Mr. Rosendale signed legal documents affirming that he is a resident of Maryland. This is not the case. In fact, per the attached letter from the Atlantic Title Group, it is clear that they mistakenly sent Mr. Rosendale the wrong form and the Rosendales did not check any boxes relating to residency. The letter further acknowledges the Rosendales were indeed residents of Montana at the time of the sale of

**T | 202.417.3529**

**🐦 | @GoberGroup**

**F | 877.437.5755**

**🌐 | GoberGroup.com**

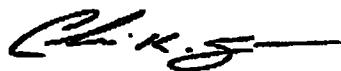
land in question. In addition, it was the title company, not the Rosendales, who later wrongly checked the residency box. Thus, Mr. Rosendale never affirmed that he was a resident of Maryland, and to suggest otherwise is false and misleading.

This attack by Principles First PAC does not constitute a "candidate use." Under *Columbia Broadcasting Sys., Inc. v. Democratic Nat'l Comm.*, 412 U.S. 94 (1973), and *Nat'l Conservative Political Action Comm.*, 89 FCC 2d 626 (1982), your station is not obligated to air any third-party advertisements, such as those aired by Principles First PAC. Simply put, Principles First PAC does not have a guaranteed right of access to air the Advertisements on your network, and your network is not protected from legal liability for airing the Advertisement.

Broadcast licensees have a legal responsibility to review and to eliminate any false, misleading, or deceptive materials contained in advertising. We urge you to recognize Principles First PAC's blatant disregard for the facts and respectfully demand that your network refuse to air this false Advertisement. We further request that you reject any attempts by Principles First PAC to purchase time for the future airing of this Advertisement because of its material misstatements of fact and blatant disregard for the truth.

Thank you for your prompt attention to this matter. Please contact me at your earliest convenience to advise on your network's actions regarding the airing of this Advertisement.

Sincerely,



Chris K. Gober  
Counsel to Matt Rosendale for Montana  
The Gober Group  
P.O. Box 341016  
Austin, TX 78734  
512.354.1783  
cg@gobergroup.com

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🌐 | GoberGroup.com



605 Baltimore Annapolis Blvd, Suite 2  
Severna Park, MD 21146  
410-431-7117 (p) / 410-431-7119 (f)

April 23, 2018

Matthew Rosendale and Jean Rosendale

Glendive, MT 59330

Re: MD Withholding Form

Dear Mr. and Mrs. Rosendale:

Per your request I have reviewed your closing and recordation documents related to the sale of the real property at , Centreville, MD 21617. It appears that you were mistakenly sent the incorrect Certificate of Exemption from Withholding and during our processing; the Maryland resident exemption was incorrectly attributed to your Certificate without your knowledge. Said document was subsequently recorded with the Deed. This document is used when a seller is a resident of Maryland or fulfills other statutory requirements. Unfortunately, this was not the case under your closing since you both were in fact residents of the State of Montana.

However, I have surmised that there were no issues with the recording as presented to the Courthouse. This document is used in conjunction with other tax calculations to determine if a seller owes a withholding tax to the State of Maryland. In your case, there ultimately was no profit from the sale, rendering the aforementioned affidavit moot. As there were no additional taxes owed to the State of Maryland, there was no need for a different withholding form.

We could go through a process to re-record and correct the minor error. However, this would only serve to unnecessarily confuse the chain of title. It is my opinion that there were no consequences to the execution/ recordation of this document and I recommend no further action on the matter. You and your wife were, of course, not residents of Maryland and we should not have sent you this document for execution. It was an error on our part and we apologize.

Sincerely,

James Yoke, Esq.  
The Atlantic Title Group

\_\_\_\_\_

# Introduction

## AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

<b>Station and Location:</b> KPAX	<b>Date:</b> 5/18/19
--------------------------------------	-------------------------

I, TJ Osborne

do hereby request station time concerning the following issue:

Principles First PAC
----------------------

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks

This broadcast time will be used by: Principles First PAC

**THIS PAGE MUST BE COMPLETED FOR PROGRAMMING THAT  
"COMMUNICATES A POLITICAL MATTER OF NATIONAL IMPORTANCE."  
FOR ALL OTHER ISSUE ADS, PLEASE GO TO PAGE 3.**

Programming that "communicates a political matter of national importance" includes (1) references to legally qualified candidates (presidential, vice presidential or congressional); (2) any election to Federal office (e.g., any references to "our next senator", "our person in Washington" or "the President"); and (3) a national legislative issue of public importance (e.g., Affordable Care Act, revising the IRS tax code, federal gun control or any federal legislation).

**Does the programming (in whole or in part) communicate "a message relating to any political matter of national importance?"**

☒ **Yes**

☐ **No**

For programming that "communicates a message relating to any political matter of national importance," list the name of the legally qualified candidate(s) the programming refers to, the offices being sought, the date(s) of the election(s) and/or the issue to which the communication refers (if applicable):

US House race for Montana primary

I represent that the payment for the above described broadcast time has been furnished by (name and address):

Principles First PAC

and you are authorized to announce the time as paid for by such person or entity (hereinafter referred to as the "sponsor").

List the chief executive officers or members of the executive committee or the board of directors below (or attach separately):

Randy Pullen

For programming that "communicates a message relating to any political matter of national importance," attach Agreed Upon Schedule (Page 5)

**THIS PAGE MUST BE COMPLETED FOR PROGRAMMING THAT  
DOES NOT "COMMUNICATE A POLITICAL MATTER OF NATIONAL  
IMPORTANCE"**

I represent that the payment for the above described broadcast time has been furnished  
by (name and address):

and you are authorized to announce the time as paid for by such person or entity  
(hereinafter referred to as the "sponsor").

List the chief executive officers or members of the executive committee or the board of  
directors below (or attach separately):

**TO BE COMPLETED FOR ALL ISSUE ADVERTISEMENTS**

**THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.**

The Sponsor agrees to indemnify and hold harmless the station for any damages or liability, including reasonable attorney's fees, that may ensue from the broadcast of the above-requested advertisement(s). For the above-stated broadcast(s), the sponsor also agrees to prepare a script, transcript, or tape, which will be delivered to the station at least \_\_\_\_\_ before the time of the scheduled broadcasts.

**TO BE SIGNED BY ISSUE ADVERTISER (SPONSOR)**

5/18/2018

Date

Signature

2023375700

Contact Phone Number

**TO BE SIGNED BY STATION REPRESENTATIVE**

☐ Accepted

☐ Accepted in Part

☐ Rejected

Signature

Printed Name

Title

## AGREED UPON SCHEDULE

**For All Issue Advertisements That Communicate a Message Relating to Any Political Matter of National Importance**

<b>Broadcast Length</b>	<b>Time of Day, Rotation or Package</b>	<b>Days</b>	<b>Class</b>	<b>Times per Week</b>	<b>Number of Weeks</b>

**Attach proposed schedule with charges (if available):**

### AFTER AIRING OF BROADCASTS:

Attach invoices or Schedule Run Summary to this Form showing:

- (1) actual air time and charges for each spot;
- (2) the date(s), exact time(s) and reason(s) for Make-Good(s), if any; and
- (3) the amount of rebates given (identify exact date, time, class of broadcast and dollar amount for each rebate), if any.

**Note:** Because the FCC requires that the political file contain the actual time the rate for spots "communicating a political matter of national importance" air, that information should be included in the file as soon as possible. If that information is only generated monthly, the file should include the name of a contact person who can provide the times that and rates for specific spots aired. The FCC's online political files include a folder for "Terms and Disclosures." NAB suggests that, for stations subject to the online public file rule, the names of contact person(s) be placed in that folder.

# EXHIBIT C

**CONTRACT**

**KPAX-TV/KAJ-TV**  
**PO Box 4827**  
**Missoula, MT 59806**  
**(406) 542-4400**

And:

**Nebo Media Inc**  
**1911 N Ft Myer Dr**  
**Ste 400**  
**Arlington, VA 22209**

<b>Contract / Revision</b> 127039 /		<b>Alt Order #</b> 09086819
<b>Product</b> PRINCIPLES FIRST PAC		
<b>Contract Dates</b> 05/22/18 - 05/29/18	<b>Estimate #</b> 4080	
<b>Advertiser</b> Principles First PAC		<b>Original Date / Revision</b> 05/18/18 / 05/18/18
<b>Billing Cycle</b> EOM/EOC	<b>Billing Calendar</b> Broadcast	<b>Cash/Trade</b> Cash
<b>Property</b> KPAX	<b>Account Executive</b> Alex Hong (HRP)	<b>Sales Office</b> National Washin
<b>Special Handling</b>		
<b>Demographic</b> Adults 35+		
<b>Agency Code</b>	<b>Advertiser Code</b> 358	<b>Product 1/2</b> 446
<b>Agency Ref</b>		<b>Advertiser Ref</b>

*Line	Ch	Start Date	End Date	Description	Start/End Time	Days	Length	Spots/Week	Rate	Rtn	Type	Spots	Amount
N 1	All	05/28/18	05/28/18	Montana This Morning	5:30 AM-7:00 AM		:30				NM	1	\$400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	1-----				1	\$400.00				
N 2	All	05/24/18	05/24/18	Noon News	12:00 PM-12:30 PM		:30				NM	1	\$300.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/21/18	05/27/18	---1---				1	\$300.00				
N 3	All	05/25/18	05/25/18	Noon News	12:00 PM-12:30 PM		:30				NM	1	\$300.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/21/18	05/27/18	----1--				1	\$300.00				
N 4	All	05/29/18	05/29/18	Noon News	12:00 PM-12:30 PM		:30				NM	1	\$300.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	-1-----				1	\$300.00				
N 5	All	05/28/18	05/28/18	M-F	4:00 PM-5:00 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	1-----				1	\$200.00				
N 6	All	05/22/18	05/22/18	M-F	4:00 PM-5:00 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/21/18	05/27/18	-1-----				1	\$200.00				
N 7	All	05/23/18	05/23/18	M-F	4:00 PM-5:00 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/21/18	05/27/18	--1----				1	\$200.00				
N 8	All	05/24/18	05/24/18	M-F	4:00 PM-5:00 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/21/18	05/27/18	---1---				1	\$200.00				
N 9	All	05/25/18	05/25/18	M-F	4:00 PM-5:00 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/21/18	05/27/18	----1--				1	\$200.00				
N 10	All	05/29/18	05/29/18	M-F	4:00 PM-5:00 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	-1-----				1	\$200.00				
N 11	All	05/23/18	05/23/18	M-F 530p News	5:30 PM-6:00 PM		:30				NM	1	\$1,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/21/18	05/27/18	--1----				1	\$1,500.00				

(\* Line Transactions: N = New, E = Edited, D = Deleted)

Notwithstanding to whom bills are rendered, advertiser, agency and service, jointly and severally, shall remain obligated to pay to station the amount of any bills rendered by station within the time specified and until payment in full is received by station. Payment by advertiser to agency or to service or payment by agency to service, shall not constitute payment to station. Station will not be bound by conditions, printed or otherwise contracts, insertion orders, copy instructions or any correspondence when such conflict with the above terms and conditions. Two week advance cancellation notice is required unless otherwise specified.



**KPAX-TV/KAJ-TV**  
**PO Box 4827**  
**Missoula, MT 59806**  
**(406) 542-4400**

<b>Contract / Revision</b>	<b>Alt Order #</b>
127039 /	09086819

<b>Contract Dates</b>	<b>Product</b>	<b>Estimate #</b>
05/22/18 - 05/29/18	PRINCIPLES FIRST PAC	4080

<b>Advertiser</b>	<b>Original Date / Revision</b>
Principles First PAC	05/18/18 / 05/18/18

*Line	Ch	Start Date	End Date	Description	Start/End Time	Days	Length	Spots/Week	Rate	Rtn	Type	Spots	Amount
N 12	All	05/22/18	05/22/18	Montana This Morning	5:30 AM-7:00 AM		:30				NM	1	\$400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	-1-----				1	\$400.00				
N 13	All	05/25/18	05/25/18	M-F 530p News	5:30 PM-6:00 PM		:30				NM	1	\$1,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	----1--				1	\$1,500.00				
N 14	All	05/28/18	05/28/18	M-F	6:30 PM-7:00 PM		:30				NM	1	\$1,000.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/28/18	06/03/18	1-----				1	\$1,000.00				
N 15	All	05/22/18	05/22/18	M-F	6:30 PM-7:00 PM		:30				NM	1	\$1,000.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	-1-----				1	\$1,000.00				
N 16	All	05/22/18	05/22/18	M-F 10p News	10:00 PM-10:35 PM		:30				NM	1	\$1,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	-1-----				1	\$1,500.00				
N 17	All	05/24/18	05/24/18	M-F 10p News	10:00 PM-10:35 PM		:30				NM	1	\$1,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	---1---				1	\$1,500.00				
N 18	All	05/29/18	05/29/18	M-F 10p News	10:00 PM-10:35 PM		:30				NM	1	\$1,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/28/18	06/03/18	-1-----				1	\$1,500.00				
N 19	All	05/28/18	05/28/18	The Late Show	10:35 PM-11:35 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/28/18	06/03/18	1-----				1	\$200.00				
N 20	All	05/22/18	05/22/18	The Late Show	10:35 PM-11:35 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	-1-----				1	\$200.00				
N 21	All	05/24/18	05/24/18	The Late Show	10:35 PM-11:35 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	---1---				1	\$200.00				
N 22	All	05/25/18	05/25/18	The Late Show	10:35 PM-11:35 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	----1--				1	\$200.00				
N 23	All	05/25/18	05/25/18	Montana This Morning	5:30 AM-7:00 AM		:30				NM	1	\$400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	----1--				1	\$400.00				
N 24	All	05/29/18	05/29/18	The Late Show	10:35 PM-11:35 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/28/18	06/03/18	-1-----				1	\$200.00				
N 25	All	05/28/18	05/28/18	CBS This Morning	7:00 AM-9:00 AM		:30				NM	1	\$400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/28/18	06/03/18	1-----				1	\$400.00				
N 26	All	05/22/18	05/22/18	CBS This Morning	7:00 AM-9:00 AM		:30				NM	1	\$400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	-1-----				1	\$400.00				
N 27	All	05/24/18	05/24/18	CBS This Morning	7:00 AM-9:00 AM		:30				NM	1	\$400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	---1---				1	\$400.00				
N 28	All	05/25/18	05/25/18	CBS This Morning	7:00 AM-9:00 AM		:30				NM	1	\$400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				

(\* Line Transactions: N = New, E = Edited, D = Deleted)

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KPAX-TV/KAJ-TV  
PO Box 4827  
Missoula, MT 59806  
(406) 542-4400

<b>Contract / Revision</b>	<b>Alt Order #</b>
127039 /	09086819

<b>Contract Dates</b>	<b>Product</b>	<b>Estimate #</b>
05/22/18 - 05/29/18	PRINCIPLES FIRST PA	4080

<b>Advertiser</b>	<b>Original Date / Revision</b>
Principles First PAC	05/18/18 / 05/18/18

*Line	Ch	Start Date	End Date	Description	Start/End Time	Days	Length	Spots/Week	Rate	Rtn	Type	Spots	Amount
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	----1--				1	\$400.00				
N 29	All	05/29/18	05/29/18	CBS This Morning	7:00 AM-9:00 AM		:30				NM	1	\$400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/28/18	06/03/18	-1-----				1	\$400.00				
N 30	All	05/23/18	05/23/18	Noon News	12:00 PM-12:30 PM		:30				NM	1	\$300.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
Week:		05/21/18	05/27/18	--1----				1	\$300.00				
Totals								0.00				30	\$16,100.00

Time Period	# of Spots	Gross Amount	Agency Comm.	Net Amount
04/30/18 - 05/27/18	20	\$11,300.00	(\$1,695.00)	\$9,605.00
05/28/18 - 05/29/18	10	\$4,800.00	(\$720.00)	\$4,080.00
<b>Totals</b>	30	\$16,100.00	(\$2,415.00)	\$13,685.00

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

This station does not discriminate in the sale of advertising time, and will accept no advertising which is placed with an intent to discriminate on the basis of race, national origin or ancestry. Advertiser hereby certifies that it is not buying broadcasting air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, national origin or ancestry. We reserve the right not to accept all copy.

(\* Line Transactions: N = New, E = Edited, D = Deleted)

Notwithstanding to whom bills are rendered, advertiser, agency and service, jointly and severally, shall remain obligated to pay to station the amount of any bills rendered by station within the time specified and until payment in full is received by station. Payment by advertiser to agency or to service or payment by agency to service, shall not constitute payment to station. Station will not be bound by conditions, printed or otherwise contracts, insertion orders, copy instructions or any correspondence when such conflict with the above terms and conditions. Two week advance cancellation notice is required unless otherwise specified.

# EXHIBIT D

10-105M-10000



KECI-KCFW Combo  
340 West Main St  
Missoula, MT 59802

### Contract # 3346016

Schedule Dates

05/22/18-05/29/18

Advertiser

Principles First (124745)

Agency

Nebo Media (10105)

Product

POLITICAL ISSUE (ns) (1187)

Brand

ISSUE ADVERTISING (218560)

Salesperson

Katz/DC, Washington DC (4022)

Sales Office

Katz Washington DC

Buyer Name

TJ Osborne,

Phone/Fax

/

CPE

358/446/4080

Account Types

National/Political Issue Agency BRD

Billing Type

Standard

Comments

Issue Separation: 30

Nebo Media  
PO Box 9825  
Arlington, VA 22219

Date Entered 05/22/18  
Last Modified 05/22/18  
Entered By Leslie Stolt-Onell  
CO-OP No  
Headline # ECR26016641  
Demo  
Order Type Normal  
Package Deal  
Commission % 15.00  
Commission \$1,447.50  
Net Total \$8,202.50  
Sales Tax

KECI-KCFW Combo (KECI+KCFW)  
By Broadcast Month Spots Rate  
May, 2018 16 \$5,990.00  
Jun, 2018 9 \$3,660.00  
Grand Total: 25 \$9,650.00

Line	Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPW	Mo	Tu	We	Th	Fr	Sa	Su	Spots	Rate	Total	Station	Comments	Entered
1.0	Normal Line / News	05/22/18-05/22/18	1	:30	6A- 6:30A (MST)	1		X						1	\$290.00	\$290.00	KECI+KCFW Combo	MONTANA TODAY	5/21/18
2.0	Normal Line / News	05/23/18-05/23/18	1	:30	6A- 6:30A (MST)	1					X			1	\$290.00	\$290.00	KECI+KCFW Combo	MONTANA TODAY	5/21/18
3.0	Normal Line / News	05/24/18-05/24/18	1	:30	6A- 6:30A (MST)	1	X							1	\$290.00	\$290.00	KECI+KCFW Combo	MONTANA TODAY	5/21/18
4.0	Normal Line / News	05/25/18-05/25/18	1	:30	6:30A- 7A (MST)	1		X						1	\$290.00	\$290.00	KECI+KCFW Combo	MONTANA TODAY	5/21/18
5.0	Normal Line / News	05/26/18-05/26/18	1	:30	6:30A- 7A (MST)	1			X					1	\$290.00	\$290.00	KECI+KCFW Combo	MONTANA TODAY	5/21/18
6.0	Normal Line / News	05/27/18-05/27/18	1	:30	6:30A- 7A (MST)	1				X				1	\$290.00	\$290.00	KECI+KCFW Combo	MONTANA TODAY	5/21/18
7.0	Normal Line / News	05/28/18-05/28/18	1	:30	6:30A- 7A (MST)	1	X							1	\$290.00	\$290.00	KECI+KCFW Combo	MONTANA TODAY	5/21/18
8.0	Normal Line / News	05/29/18-05/29/18	1	:30	6:30A- 7A (MST)	1		X						1	\$290.00	\$290.00	KECI+KCFW Combo	MONTANA TODAY	5/21/18
9.0	Normal Line / News	05/30/18-05/30/18	1	:30	5P- 5:30P (MST)	1					X			1	\$460.00	\$460.00	KECI+KCFW Combo	NEWS AT 5	5/21/18
10.0	Normal Line / News	05/31/18-05/31/18	1	:30	5P- 5:30P (MST)	1	X							1	\$460.00	\$460.00	KECI+KCFW Combo	NEWS AT 5	5/21/18
11.0	Normal Line / News	05/22/18-05/22/18	1	:30	6P- 6:30P (MST)	1		X						1	\$940.00	\$940.00	KECI+KCFW Combo	News at 6pm	5/21/18
12.0	Normal Line / News	05/23/18-05/23/18	1	:30	6P- 6:30P (MST)	1				X				1	\$940.00	\$940.00	KECI+KCFW Combo	News at 6pm	5/21/18
13.0	Normal Line / News	05/24/18-05/24/18	1	:30	6P- 6:30P (MST)	1	X							1	\$940.00	\$940.00	KECI+KCFW Combo	News at 6pm	5/21/18

### CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:

Date:

Accepted-Station:

Date:

Comments:

The parties intend for the Standard Advertiser Terms and Conditions ("Terms") located at: <http://adg.net/p=1224> to be part of their agreement, and the sale of advertising is expressly subject to said Terms.



Nabo Media  
PO Box 9825  
Arlington, VA 22219

KECI+KCFW Combo  
340 West Main St  
Missoula, MT 59802

### Contract #

3346016

### Schedule Dates

05/22/18-05/29/18

### Agency

Principles First (124745)

### Product

Nabo Media (10105)

### Brand

POLITICAL ISSUE (ns) (1187)

### Salesperson

ISSUE ADVERTISING (218560)

### Sales Office

Katz/DC, Washington DC (4022)

### Buyer Name

Katz, Washington DC

### Phone/Fax

TJ Osborne,

### CPE

358/446/4080

### Account Types

National/Political Issue Agency BRD

### Billing Type

Standard

### Comments

Issue

Separation: 30

Date Entered 05/21/18  
Last Modified 05/21/18  
Entered By Leslie Stoll-O'Neill  
CO-OP No  
Headline # ECR26016641  
Demo  
Order Type Normal  
Package Deal  
Commission % 15.00  
Commission \$1,447.50  
Net Total \$8,202.50  
Sales Tax

### KECI+KCFW Combo (KECI+KCFW)

By Broadcast Month	Spots	Rate
May, 2018	16	\$5,990.00
Jun, 2018	9	\$3,660.00
<b>Grand Total:</b>	<b>25</b>	<b>\$9,650.00</b>

Line	Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPW	Mo	Tu	We	Th	Fr	Sa	Su	Spots	Rate	Total	Station	Comments	Entered
14.0	Normal Line / News	05/24/18-05/24/18	1	:30	10P-10:35P (MST)	1				X				1	\$560.00	\$560.00	KECI+KCFW Combo (KECI+KCFW)	News at 10	5/21/18
15.0	Normal Line / News	05/28/18-05/28/18	1	:30	10P-10:35P (MST)	1	X							1	\$560.00	\$560.00	KECI+KCFW Combo (KECI+KCFW)	News at 10	5/21/18
16.0	Normal Line / SPOT	05/22/18-05/22/18	1	:30	4P-5P (MST)	1		X						1	\$220.00	\$220.00	KECI+KCFW Combo (KECI+KCFW)	ELLEN	5/21/18
17.0	Normal Line / SPOT	05/28/18-05/28/18	1	:30	4P-5P (MST)	1	X							1	\$220.00	\$220.00	KECI+KCFW Combo (KECI+KCFW)	ELLEN	5/21/18
18.0	Normal Line / SPOT	05/21/18-05/21/18	1	:30	6:30P-7P (MST)	1			X					1	\$300.00	\$300.00	KECI+KCFW Combo (KECI+KCFW)	Entertainment Tonight	5/21/18
19.0	Normal Line / SPOT	05/25/18-05/25/18	1	:30	6:30P-7P (MST)	1				X				1	\$300.00	\$300.00	KECI+KCFW Combo (KECI+KCFW)	Entertainment Tonight	5/21/18
20.0	Normal Line / SPOT	05/29/18-05/29/18	1	:30	6:30P-7P (MST)	1		X						1	\$300.00	\$300.00	KECI+KCFW Combo (KECI+KCFW)	Entertainment Tonight	5/21/18
21.0	Normal Line / SPOT	05/22/18-05/22/18	1	:30	10:35P-11:35P (MST)	1		X						1	\$290.00	\$290.00	KECI+KCFW Combo (KECI+KCFW)	Tonight Show	5/21/18
22.0	Normal Line / SPOT	05/24/18-05/24/18	1	:30	10:35P-11:35P (MST)	1				X				1	\$290.00	\$290.00	KECI+KCFW Combo (KECI+KCFW)	Tonight Show	5/21/18
23.0	Normal Line / SPOT	05/28/18-05/28/18	1	:30	10:35P-11:35P (MST)	1	X							1	\$290.00	\$290.00	KECI+KCFW Combo (KECI+KCFW)	Tonight Show	5/21/18
24.0	Normal Line / SPOT	05/26/18-05/26/18	1	:30	10:30P-12A (MST)	1						X		1	\$400.00	\$400.00	KECI+KCFW Combo (KECI+KCFW)	SNL	5/21/18
25.0	Normal Line / SPOT	05/29/18-05/29/18	1	:30	7P-9P (MST)	1		X						1	\$560.00	\$560.00	KECI+KCFW Combo (KECI+KCFW)	America's Got Talent	5/21/18

## CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:

Date:

Accepted-Station:

Date:

Comments:

The parties intend for the Standard Advertiser Terms and Conditions ("Terms") located at: <http://bit.ly/standardterms> to be part of their agreement, and the sale of advertising is expressly subject to said Terms.

Contract # 26016541 Changes as of: 5/18/2018 at 1:44 PM Version: Original Order  
 CPE: 369/446/4080 Flight: 5/22/18 - 5/29/18 Station: KEGC  
 Agency: NEBO MEDIA Advertiser: Principles First PAC Market: Missoula  
 1911 N.FORT MYER Product: Issue Office: WASHINGTON  
 DRIVE ARLINGTON, VA Agency Order #: 7363565 Service: Nielsen  
 22209



125 West 58th St  
 New York, NY 10019

Buyer: Osborne, TJ Primary Demo:  
 Salesperson: MATTHEW MULZOFF Assistant: MATTHEW MULZOFF  
 202-955-5342 Traffic #: 3346016

Separation:

Comments: Separation: 30

#	Day/Time	DP	Program	Rate	Len	5/22	5/23	5/24	5/25	5/26	5/27	5/28	5/29	Total Spots	Total \$	CPP*	GRP*
1	Tu-FM 6a-630a		MONTANA TODAY2	\$290.00	30	1	0	0	1	0	0	1	0	3	\$870.00	\$0.00	0.0
2	Tu-FM 630a-7a		MONTANA TODAY3	\$290.00	30	1	1	1	0	0	0	1	1	5	\$1,450.00	\$0.00	0.0
3	Tu-FM 5p-530p		NEWS AT 5	\$460.00	30	0	0	0	1	0	0	1	0	2	\$920.00	\$0.00	0.0
4	Tu-FM 6p-630p		News at 6pm	\$540.00	30	1	1	0	1	0	0	0	0	3	\$1,620.00	\$0.00	0.0
5	Tu-FM 10p-1035p		News at 10	\$660.00	30	0	0	1	0	0	0	1	0	2	\$1,320.00	\$0.00	0.0
6	Tu-FM 4p-5p		ELLEN	\$220.00	30	1	0	0	0	0	0	1	0	2	\$440.00	\$0.00	0.0
7	Tu-FM 630p-7p		Entertainment Tonight	\$300.00	30	0	1	0	1	0	0	0	1	3	\$900.00	\$0.00	0.0
8	Tu-FM 1035p-1135p		Tonight Show	\$290.00	30	1	0	1	0	0	0	1	0	3	\$870.00	\$0.00	0.0
9	Sa 1030p-12m		SNL	\$400.00	30	0	0	0	0	0	1	0	0	1	\$400.00	\$0.00	0.0
10	Tu 7p-9p		America's Got Talent	\$860.00	30	0	0	0	0	0	0	0	1	1	\$860.00	\$0.00	0.0
TOTALS:						5	3	3	4	1	0	6	3	25	\$9,850.00	\$0.00	0.0



**KATZ TELEVISION**  
GROUP

125 West 55th St  
New York, NY 10019

Contract # 26016641      Changes as of: 5/18/2018 at 1:44 PM      Version: Original Order

CPE: 358/46/4080      Flight: 5/22/18 - 5/29/18      Station: KECI      Con Type: POLITICAL/NOTE  
 Agency: NEBO MEDIA      Advertiser: Principles First PAC      Market: Missoula      Total \$: \$9,650.00  
 1911 N.FORT MYER      Product: Issue      Office: WASHINGTON      Total Spots: 25  
 DRIVE      Agency Order #: 7363565      Service: Nielsen      Total CPP: \$0.00  
 ARLINGTON, VA      Buyer: Osborne, TJ      Primary Demo:      Total GRP:      Traffic #: 3346016  
 22209      Salesperson: MATTHEW MULZOFF      Assistant: 202-955-5342      Separation:

Special Instructions

Order Level Comments		
Date/Time	Added by	Comment
05/18/18 1:45 PM	MATTHEW MULZOFF	Separation: 30

Competitive Information	
Market Budget: \$26,081	
KECI Share: 37%	
Comment:	
KPAX: 60%	
KTNF: 3%	

Daypart Summary				
Day/Time	% Distrib	Spots	Dollars	GRP
Total	100%	25	\$9,650.00	0.0

Monthly Summary			
Month	Spots	Dollars	
2018-May	18	\$5,990.00	
2018-Jun	9	\$3,660.00	
Total	25	\$9,650.00	

Transaction History				
Trans	Created/Received	Created by	Status	
Queued for Electronic Contracting	5/18/18 3:59 PM			
New	5/18/18 1:44 PM	MATTHEW MULZOFF	New	

Trans	Created/Received	Created by	Status	Spot#	\$ Chg	Contract \$	Comment
Queued for Electronic Contracting	5/18/18 3:59 PM				\$0	\$0	
New	5/18/18 1:44 PM	MATTHEW MULZOFF	New	25	\$9,650.00	\$9,650.00	

PARAGRAPHS 49 AND 50 OF THE UNITED STATES FEDERAL COMMUNICATIONS COMMISSION'S REPORT AND ORDER NO. 07-217 PROVIDES THAT BROADCAST STATIONS' ADVERTISING CONTRACTS WILL NOT DISCRIMINATE ON THE BASIS OF RACE OR ETHNICITY, AND MUST CONTAIN NONDISCRIMINATION CLAUSES, CONSISTENT WITH THIS ORDER. KATZ MEDIA GROUP (INCLUDING ANY SUBSIDIARY OR DIVISION OF KATZ) DOES NOT DISCRIMINATE IN ANY BROADCAST ADVERTISING CONTRACT ON THE BASIS OF RACE OR ETHNICITY AND EVALUATES, NEGOTIATES AND COMPLETES ITS BROADCAST ADVERTISING CONTRACTS WITHOUT REGARD TO RACE OR ETHNICITY.

## AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Station and Location: <b>KECK MISSOULA/KAXR</b>	Date: <b>5/24/18</b>
--	-------------------------

I, **TJ Osborne**

do hereby request station time concerning the following issue:

<b>Principles First PAC</b>
-----------------------------

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks

This broadcast time will be used by: **Principles First PAC**

**THIS PAGE MUST BE COMPLETED FOR PROGRAMMING THAT  
"COMMUNICATES A POLITICAL MATTER OF NATIONAL IMPORTANCE."  
FOR ALL OTHER ISSUE ADS, PLEASE GO TO PAGE 3.**

Programming that "communicates a political matter of national importance" includes (1) references to legally qualified candidates (presidential, vice presidential or congressional); (2) any election to Federal office (e.g., any references to "our next senator", "our person in Washington" or "the President"); and (3) a national legislative issue of public importance (e.g., Affordable Care Act, revising the IRS tax code, federal gun control or any federal legislation).

**Does the programming (in whole or in part) communicate "a message relating to any political matter of national importance?"**

☐ Yes

☒ No

For programming that "communicates a message relating to any political matter of national importance," list the name of the legally qualified candidate(s) the programming refers to, the offices being sought, the date(s) of the election(s) and/or the issue to which the communication refers (if applicable):

I represent that the payment for the above described broadcast time has been furnished by (name and address):

and you are authorized to announce the time as paid for by such person or entity (hereinafter referred to as the "sponsor").

List the chief executive officers or members of the executive committee or the board of directors below (or attach separately):

For programming that "communicates a message relating to any political matter of national importance," attach Agreed Upon Schedule (Page 5)

**THIS PAGE MUST BE COMPLETED FOR PROGRAMMING THAT  
DOES NOT "COMMUNICATE A POLITICAL MATTER OF NATIONAL  
IMPORTANCE"**

I represent that the payment for the above described broadcast time has been furnished  
by (name and address):

Principles First PAC

and you are authorized to announce the time as paid for by such person or entity  
(hereinafter referred to as the "sponsor").

List the chief executive officers or members of the executive committee or the board of  
directors below (or attach separately):

Randy Pullen

**TO BE COMPLETED FOR ALL ISSUE ADVERTISEMENTS**

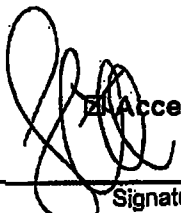
**THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.**

The Sponsor agrees to indemnify and hold harmless the station for any damages or liability, including reasonable attorney's fees, that may ensue from the broadcast of the above-requested advertisement(s). For the above-stated broadcast(s), the sponsor also agrees to prepare a script, transcript, or tape, which will be delivered to the station at least \_\_\_\_\_ before the time of the scheduled broadcasts.

**TO BE SIGNED BY ISSUE ADVERTISER (SPONSOR)**

5/18/2018      TJ Osborne      Digitally signed by TJ Osborne  
Date: 2018.05.18 15:14:00 -0400      2023375700  
Date                                  Signature                                  Contact Phone Number

**TO BE SIGNED BY STATION REPRESENTATIVE**

☒ Accepted      ☐ Accepted in Part      ☐ Rejected  
      Leslie Onizui      NSM  
Signature                                  Printed Name                                  Title

## AGREED UPON SCHEDULE

**For All Issue Advertisements That Communicate a Message Relating to Any Political Matter of National Importance**

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks

**Attach proposed schedule with charges (if available):**

## AFTER AIRING OF BROADCASTS:

Attach Invoices or Schedule Run Summary to this Form showing:

- (1) actual air time and charges for each spot;
- (2) the date(s), exact time(s) and reason(s) for Make-Good(s), if any; and
- (3) the amount of rebates given (identify exact date, time, class of broadcast and dollar amount for each rebate), if any.

**Note:** Because the FCC requires that the political file contain the actual time the rate for spots "communicating a political matter of national importance" air, that information should be included in the file as soon as possible. If that information is only generated monthly, the file should include the name of a contact person who can provide the times that and rates for specific spots aired. The FCC's online political files include a folder for "Terms and Disclosures." NAB suggests that, for stations subject to the online public file rule, the names of contact person(s) be placed in that folder.

# EXHIBIT E

10-10-01-10-01-01

## ORDER

<b>Orders</b>	<b>Order / Rev:</b>	<b>131067</b>	
	<b>Alt Order #:</b>	<b>26016613</b>	
	<b>Product Desc:</b>	<b>Issue</b>	
	<b>Estimate:</b>	<b>4080</b>	<b>KTMF</b>
	<b>Flight Dates:</b>	<b>05/22/16 - 05/29/16</b>	<b>Primary AE:</b> <b>Katz Washington DC</b>
	<b>Original Date / Rev:</b>	<b>05/21/16 / 05/24/16</b>	<b>Sales Office:</b> <b>K-WDC</b>
	<b>Order Type:</b>	<b>GENERAL</b>	<b>Sales Region:</b> <b>NAT</b>

<b>Agency</b>	<b>Name:</b>	<u>Nebo Media</u>	<b>Billing Type:</b>	<u>Cash</u>
	<b>Buying Contact:</b>	<u></u>	<b>Billing Calendar:</b>	<u>Broadcast</u>
	<b>Billing Contact:</b>	<u></u>	<b>Billing Cycle:</b>	<u>EOM/EOC</u>
		<u>1911 North Ft Myer Drive Ste. 400</u>	<b>Agency Commission:</b>	<u>15%</u>
		<u>Arlington, VA 22209</u>		

<b>Advertiser</b>	<b>Name:</b>	<b>POL/Principles First PAC</b>	<b>New Business Thru:</b>	
	<b>Demographic:</b>	<b>HH</b>	<b>Advertiser External ID:</b>	
	<b>Product Codes:</b>	<b>PL Issue</b>	<b>Agency External ID:</b>	
	<b>Revenue Code 1:</b>	<b>AGY</b>	<b>Unit Code:</b>	<b>General</b>
	<b>Revenue Code 2:</b>	<b>POL</b>	<b>Order Separation:</b>	<b>00:20:00</b>
	<b>Revenue Code 3:</b>	<b>ISS</b>		
	<b>Priority:</b>	<b>IS</b>		

## Bill Plan

Start Date	End Date	# Spots	Gross Amount	Net Amount
04/30/18	05/27/18	5	\$355.00	\$301.75
05/28/18	05/28/18	7	\$520.00	\$442.00

**Totals**

Month	# Spots	Gross Amount	Net Amount	Rating
May 2018	5	\$355.00	\$301.75	0.00
June 2018	7	\$520.00	\$442.00	0.00
<b>Totals</b>	<b>12</b>	<b>\$875.00</b>	<b>\$743.75</b>	<b>0.00</b>

## Account Executives

Account Executive	Sales Office	Sales Region	Start Date / End Date	Order %
Katz Washington DC			Start Of Order - End Of Order	100%

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
N 1	KTMF	05/22/18	05/22/18	M-F GMA 7a-9a M-F 7a-9a	CM	8:00 AM-9:00 AM (8:00 AM-9:00 AM)	-T-----	:30	1	\$125.00	IS	0.00	NM	1	\$125.00
GD MRN AMR-ABC<															
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>	<u>Spots/Week</u>		<u>Rate</u>	<u>Rating</u>							
Week:		05/21/18	05/27/18	-T-----	1		\$125.00	0.00							
N 2	KTMF	05/24/18	05/24/18	M-F GMA 7a-9a M-F 7a-9a	CM	8:00 AM-9:00 AM (8:00 AM-9:00 AM)	---T---	:30	1	\$125.00	IS	0.00	NM	0	\$0.00
GD MRN AMR-ABC<															
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>	<u>Spots/Week</u>		<u>Rate</u>	<u>Rating</u>							
Week:		05/21/18	05/27/18	---T---	1		\$125.00	0.00							
<u>Spot</u>	<u>Ch</u>	<u>Date Range</u>	<u>Description</u>	<u>Start/End Time</u>	<u>Weekdays</u>	<u>Length</u>	<u>Rate</u>	<u>Rtg</u>	<u>Type</u>						
1	KTMF	05/21/18-05/27/18	M-F GMA 7a-9a	8:00 AM-9:00 AM	8:00 AM-9:00 AM	A---Th-----	:30	<del>(\$125.00)</del>	0.00	NM					
Credited															
N 3	KTMF	05/28/18	05/28/18	M-F GMA 7a-9a M-F 7a-9a	CM	8:00 AM-9:00 AM (8:00 AM-9:00 AM)	M-----	:30	1	\$125.00	IS	0.00	NM	1	\$125.00
GD MRN AMR-ABC<															
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>	<u>Spots/Week</u>		<u>Rate</u>	<u>Rating</u>							
Week:		05/28/18	06/03/18	M-----	1		\$125.00	0.00							
N 4	KTMF	05/22/18	05/22/18	M-F 11a-12p M-F 11a-12p	CM	11:00 AM-12:00 PM	PI-T-----	:30	1	\$40.00	IS	0.00	NM	1	\$40.00
Millionaire															

Order / Rev: 131067  
 Alt Order #: 28016613  
 Flight Dates: 05/22/18 - 05/29/18

Advertiser: POL/Principles First PAC  
 Product Desc: Issue  
 Estimate: 4080  
 KTMF

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		05/21/18	05/27/18	-T-----					1	\$40.00		0.00			
N 9	KTMF	05/22/18	05/22/18	M-F 4p-5p M-F 4p-5p	CM	4:00 PM-4:30 PM (4:00 PM-4:30 PM)	-T-----	:30	1	\$75.00IS		0.00	NM	1	\$75.00
FAMILY FEUD															
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		05/21/18	05/27/18	-T-----					1	\$75.00		0.00			
N 10	KTMF	05/25/18	05/25/18	M-F 4p-5p M-F 4p-5p	CM	4:00 PM-4:30 PM (4:00 PM-4:30 PM)	----F--	:30	1	\$75.00IS		0.00	NM	1	\$75.00
FAMILY FEUD															
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		05/21/18	05/27/18	----F--					1	\$75.00		0.00			
N 11	KTMF	05/28/18	05/28/18	M-F 4p-5p M-F 4p-5p	CM	4:00 PM-4:30 PM (4:00 PM-4:30 PM)	M-----	:30	1	\$75.00IS		0.00	NM	1	\$75.00
FAMILY FEUD															
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		05/28/18	06/03/18	M-----					1	\$75.00		0.00			
N 12	KTMF	05/29/18	05/29/18	M-F 4p-5p M-F 4p-5p	CM	4:00 PM-4:30 PM (4:00 PM-4:30 PM)	-T-----	:30	1	\$75.00IS		0.00	NM	1	\$75.00
FAMILY FEUD															
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		05/28/18	06/03/18	-T-----					1	\$75.00		0.00			
N 13	KTMF	05/23/18	05/23/18	M-F 2p-3p M-F 2p-3p	CM	2p-3p	--W----	:30	1	\$40.00IS		0.00	NM	0	\$0.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		05/21/18	05/27/18	--W----					1	\$40.00		0.00			
<u>Spot</u>		<u>Ch</u>	<u>Date Range</u>	<u>Description</u>			<u>Start/End Time</u>	<u>Weekdays</u>	<u>Length</u>	<u>Rate</u>	<u>Pri</u>	<u>Rtg</u>	<u>Type</u>		
1		KTMF	05/21/18-05/27/18	M-F 2p-3p			2p-3p	--W-----	:30	(\$40.00)		0.00	NM		
Credited															
N 14	KTMF	05/24/18	05/24/18	M-F 2p-3p M-F 2p-3p	CM	2p-3p	---T---	:30	1	\$40.00IS		0.00	NM	1	\$40.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		05/21/18	05/27/18	---T---					1	\$40.00		0.00			
N 15	KTMF	05/28/18	05/28/18	M-F 2p-3p M-F 2p-3p	CM	2p-3p	M-----	:30	1	\$40.00IS		0.00	NM	1	\$40.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		05/28/18	06/03/18	M-----					1	\$40.00		0.00			
N 16	KTMF	05/29/18	05/29/18	M-F 2p-3p M-F 2p-3p	CM	2p-3p	-T-----	:30	1	\$40.00IS		0.00	NM	1	\$40.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		05/28/18	06/03/18	-T-----					1	\$40.00		0.00			
N 17	KTMF	05/28/18	05/28/18	M-F 2p-3p M-F 2p-3p	CM	2p-3p	M-----	:30	1	\$40.00IS		0.00	NM	1	\$40.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		05/28/18	06/03/18	M-----					1	\$40.00		0.00			
N 18	KTMF	05/29/18	05/29/18	M-F GMA 7a-9a M-F 7a-9a	CM	8:00 AM-9:00 AM (8:00 AM-9:00 AM)	-T-----	:30	1	\$125.00IS		0.00	NM	1	\$125.00
GD MRN AMR-ABC<															
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		05/28/18	06/03/18	-T-----					1	\$125.00		0.00			
Totals														12	\$875.00

20180524 08:32:33



KATZ TELEVISION  
GROUP

125 West 58th St  
New York, NY 10019

Contract # 28016613

CPE: 358446/4080  
Agency: NEBO MEDIA  
1911 N FORT MYER  
DRIVE  
ARLINGTON, VA  
22209

Changes as of: 5/24/2018 at 9:28 AM

Version: Current State Version 2

Student: KTMF  
Market: Missouri  
Office: WASHINGTON  
Service: Nielsen  
Buyer: Osborn, TJ  
Salesperson: SAMUEL LITTLE  
202-655-5342  
Separation:  
Comments: Separation: 30

Com Type: POLITICAL/NOTE  
Total \$: \$875.00  
Total Spots: 12  
Total CPE: \$0.00  
Total GRP:  
Traffic #: 131067

Day/Time	DP	Program	Rate	Spots	5/22	5/23	5/24	5/25	5/26	5/27	5/28	5/29	Total Spots	Total	CPE	GRP
MSD 1 Tu-F 8a-8a		GD MRN AMR-ABC<	\$125.00	30	1	0	1	0	0	0	1	0	2	\$250.00	\$0.00	0.0
MSD 4 M-F 2p-3p		Millionaire	\$40.00	30	1	1	0	0	0	0	1	1	4	\$160.00	\$0.00	0.0
MGD 5 Tu-F 8a-8a		GD MRN AMR-ABC<	\$125.00	30	0	0	0	0	0	0	0	1	1	\$125.00	\$0.00	0.0
MGD 6 M-F 2p-3p		Millionaire	\$40.00	30	0	0	0	0	0	0	1	0	1	\$40.00	\$0.00	0.0
TOTALS:				30	3	0	1	1	0	0	0	4	12	\$875.00	\$0.00	0.0

# EXHIBIT F

EXHIBIT F

## CONTRACT



KPAX-TV/KAJ-TV  
PO Box 4827  
Missoula, MT 59806  
(406) 542-4400

And:

Nebo Media Inc  
1911 N Ft Myer Dr  
Ste 400  
Arlington, VA 22209

<b>Contract / Revision</b> 127038 /		<b>Alt Order #</b> 09088820
<b>Product</b> PRINCIPLES FIRST PAC		
<b>Contract Dates</b> 05/30/18 - 06/05/18	<b>Estimate #</b> 4081	
<b>Advertiser</b> Principles First PAC		<b>Original Date / Revision</b> 05/18/18 / 05/18/18
<b>Billing Cycle</b> EOM/EOC	<b>Billing Calendar</b> Broadcast	<b>Cash/Trade</b> Cash
<b>Property</b> KPAX	<b>Account Executive</b> Alex Hong (HRP)	<b>Sales Office</b> National Washin
<b>Special Handling</b>		
<b>Demographic</b> Adults 35+		
<b>Agv Code</b>	<b>Advertiser Code</b> 358	<b>Product 1/2</b> 446
<b>Agency Ref</b>		<b>Advertiser Ref</b>

*Line	Ch	Start Date	End Date	Description	Start/End Time	Days	Length	Spots/Week	Rate	Rtn	Type	Spots	Amount
N 1	All	06/04/18	06/04/18	Montana This Morning	5:30 AM-7:00 AM		:30				NM	1	\$400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	06/04/18	06/10/18	1-----				1	\$400.00				
N 2	All	06/04/18	06/04/18	Noon News	12:00 PM-12:30 PM		:30				NM	1	\$300.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	06/04/18	06/10/18	1-----				1	\$300.00				
N 3	All	05/30/18	05/30/18	Noon News	12:00 PM-12:30 PM		:30				NM	1	\$300.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	--1----				1	\$300.00				
N 4	All	05/31/18	05/31/18	Noon News	12:00 PM-12:30 PM		:30				NM	1	\$300.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	---1---				1	\$300.00				
N 5	All	06/01/18	06/01/18	Noon News	12:00 PM-12:30 PM		:30				NM	1	\$300.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	----1--				1	\$300.00				
N 6	All	06/04/18	06/04/18	M-F	4:00 PM-5:00 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	06/04/18	06/10/18	1-----				1	\$200.00				
N 7	All	05/30/18	05/30/18	M-F	4:00 PM-5:00 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	--1----				1	\$200.00				
N 8	All	05/31/18	05/31/18	M-F	4:00 PM-5:00 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	---1---				1	\$200.00				
N 9	All	06/01/18	06/01/18	M-F	4:00 PM-5:00 PM		:30				NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	----1--				1	\$200.00				
N 10	All	05/30/18	05/30/18	M-F 530p News	5:30 PM-6:00 PM		:30				NM	1	\$1,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	--1----				1	\$1,500.00				
N 11	All	06/01/18	06/01/18	M-F 530p News	5:30 PM-6:00 PM		:30				NM	1	\$1,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>				<u>Spots/Week</u>	<u>Rate</u>				
	Week:	05/28/18	06/03/18	----1--				1	\$1,500.00				

(\* Line Transactions: N = New, E = Edited, D = Deleted)

Notwithstanding to whom bills are rendered, advertiser, agency and service, jointly and severally, shall remain obligated to pay to station the amount of any bills rendered by station within the time specified and until payment in full is received by station. Payment by advertiser to agency or to service or payment by agency to service, shall not constitute payment to station. Station will not be bound by conditions, printed or otherwise contracts, insertion orders, copy instructions or any correspondence when such conflict with the above terms and conditions. Two week advance cancellation notice is required unless otherwise specified.



**KPAX-TV/KAJ-TV**  
**PO Box 4827**  
**Missoula, MT 59806**  
**(406) 542-4400**

<u>Contract / Revision</u>	<u>Alt Order #</u>
127038 /	09086620

<u>Contract Dates</u>	<u>Product</u>	<u>Estimate #</u>
05/30/18 - 06/05/18	PRINCIPLES FIRST PA	4081

<u>Advertiser</u>	<u>Original Date / Revision</u>
Principles First PAC	05/18/18 / 05/18/18

*Line	Ch	Start Date	End Date	Description	Start/End Time	Days	Length	Spots/Week	Rate	Rtn	Type	Spots	Amount
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
N 12	All	05/30/18	05/30/18	Montana This Morning	5:30 AM-7:00 AM		:30				NM	1	\$400.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 05/28/18 06/03/18 --1---- 1 \$400.00													
N 13	All	05/31/18	05/31/18	M-F	6:30 PM-7:00 PM		:30				NM	1	\$1,000.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 05/28/18 06/03/18 ---1--- 1 \$1,000.00													
N 14	All	06/04/18	06/04/18	M-F 10p News	10:00 PM-10:35 PM		:30				NM	1	\$1,500.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 06/04/18 06/10/18 1----- 1 \$1,500.00													
N 15	All	06/01/18	06/01/18	M-F 10p News	10:00 PM-10:35 PM		:30				NM	1	\$1,500.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 05/28/18 06/03/18 ----1-- 1 \$1,500.00													
N 16	All	06/04/18	06/04/18	The Late Show	10:35 PM-11:35 PM		:30				NM	1	\$200.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 06/04/18 06/10/18 1----- 1 \$200.00													
N 17	All	05/30/18	05/30/18	The Late Show	10:35 PM-11:35 PM		:30				NM	1	\$200.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 05/28/18 06/03/18 --1---- 1 \$200.00													
N 18	All	05/31/18	05/31/18	The Late Show	10:35 PM-11:35 PM		:30				NM	1	\$200.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 05/28/18 06/03/18 ---1--- 1 \$200.00													
N 19	All	06/01/18	06/01/18	The Late Show	10:35 PM-11:35 PM		:30				NM	1	\$200.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 05/28/18 06/03/18 ----1-- 1 \$200.00													
N 20	All	05/31/18	05/31/18	Montana This Morning	5:30 AM-7:00 AM		:30				NM	1	\$400.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 05/28/18 06/03/18 ---1--- 1 \$400.00													
N 21	All	06/01/18	06/01/18	Montana This Morning	5:30 AM-7:00 AM		:30				NM	1	\$400.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 05/28/18 06/03/18 ----1-- 1 \$400.00													
N 22	All	06/04/18	06/04/18	CBS This Morning	7:00 AM-9:00 AM		:30				NM	1	\$400.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 06/04/18 06/10/18 1----- 1 \$400.00													
N 23	All	06/05/18	06/05/18	CBS This Morning	7:00 AM-9:00 AM		:30				NM	1	\$400.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 06/04/18 06/10/18 -1----- 1 \$400.00													
N 24	All	05/30/18	05/30/18	CBS This Morning	7:00 AM-9:00 AM		:30				NM	1	\$400.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 05/28/18 06/03/18 --1---- 1 \$400.00													
N 25	All	05/31/18	05/31/18	CBS This Morning	7:00 AM-9:00 AM		:30				NM	1	\$400.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 05/28/18 06/03/18 ---1--- 1 \$400.00													
N 26	All	06/01/18	06/01/18	CBS This Morning	7:00 AM-9:00 AM		:30				NM	1	\$400.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u>													
Week: 05/28/18 06/03/18 ----1-- 1 \$400.00													
<b>Totals</b>								<b>0.00</b>					<b>\$13,400.00</b>

(\* Line Transactions: N = New, E = Edited, D = Deleted)

Notwithstanding to whom bills are rendered, advertiser, agency and service, jointly and severally, shall remain obligated to pay to station the amount of any bills rendered by station within the time specified and until payment in full is received by station. Payment by advertiser to agency or to service or payment by agency to service, shall not constitute payment to station. Station will not be bound by conditions, printed or otherwise contracts, insertion orders, copy instructions or any correspondence when such conflict with the above terms and conditions. Two week advance cancellation notice is required unless otherwise specified.



**KPAX-TV/KAJ-TV**  
**PO Box 4827**  
**Missoula, MT 59806**  
**(406) 542-4400**

<u>Contract / Revision</u>	<u>Alt Order #</u>
127038 /	09086820

<u>Contract Dates</u>	<u>Product</u>	<u>Estimate #</u>
05/30/18 - 06/05/18	PRINCIPLES FIRST PA	4081

<u>Advertiser</u>	<u>Original Date / Revision</u>
Principles First PAC	05/18/18 / 05/18/18

Time Period	# of Spots	Gross Amount	Agency Comm.	Net Amount
05/28/18 - 06/05/18	26	\$13,400.00	(\$2,010.00)	\$11,390.00
<b>Totals</b>	<b>26</b>	<b>\$13,400.00</b>	<b>(\$2,010.00)</b>	<b>\$11,390.00</b>

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

This station does not discriminate in the sale of advertising time, and will accept no advertising which is placed with an intent to discriminate on the basis of race, national origin or ancestry. Advertiser hereby certifies that it is not buying broadcasting air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, national origin or ancestry. We reserve the right not to accept all copy.

(\* Line Transactions: N = New, E = Edited, D = Deleted)

Notwithstanding to whom bills are rendered, advertiser, agency and service, jointly and severally, shall remain obligated to pay to station the amount of any bills rendered by station within the time specified and until payment in full is received by station. Payment by advertiser to agency or to service or payment by agency to service, shall not constitute payment to station. Station will not be bound by conditions, printed or otherwise contracts, insertion orders, copy instructions or any correspondence when such conflict with the above terms and conditions. Two week advance cancellation notice is required unless otherwise specified.

44-621-1208-01-1

# Contract # 3352683

Schedule Dates

05/30/18-06/05/18

Agency

Principles First (124745)

Product

Nebo Media (10105)

Brand

POLITICAL ISSUE (ns) (1187)

Salesperson

ISSUE ADVERTISING (218560)

Sales Office

Katz/DC, Washington DC (4022)

Buyer Name

Katz Washington DC

Phone/Fax

TJ Osborne,

CPE

358/446/4081

Account Types

National/Political Issue Agency BRD

Billing Type

Standard

Comments

Issue Separation: 30



Nebo Media  
PO Box 9825  
Arlington, VA 22219

Date Entered 05/25/18  
Last Modified 05/25/18  
Entered By Leslie Spill-Ornell  
CO-OP No  
Headline # ECR26016644  
Demo  
Order Type Normal  
Package Deal  
Commission % 15.00  
Commission \$1,305.00  
Net Total \$7,395.00  
Sales Tax

KECI+KCPW Combo (KECI+KCPW)

By Broadcast Month	Spots	Rate
Jun. 2018	24	\$8,700.00
<b>Grand Total:</b>	<b>24</b>	<b>\$8,700.00</b>

Line	Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPW	Mo	Tu	We	Th	Fr	Sa	Su	Spots	Rate	Total	Station	Comments	Entered
1.0	Normal Line / News	05/31/18-05/31/18	1	:30	5:30A- 6A (MST)	1				X				1	\$210.00	\$210.00	KECI+KCPW Combo (KECI+KCPW)	MONTANA TODAY1	5/25/18
2.0	Normal Line / News	05/30/18-05/30/18	1	:30	6A- 6:30A (MST)	1			X					1	\$290.00	\$290.00	KECI+KCPW Combo (KECI+KCPW)	MONTANA TODAY2	5/25/18
3.0	Normal Line / News	06/01/18-06/01/18	1	:30	6A- 6:30A (MST)	1					X			1	\$290.00	\$290.00	KECI+KCPW Combo (KECI+KCPW)	MONTANA TODAY2	5/25/18
4.0	Normal Line / News	06/04/18-06/04/18	1	:30	6A- 6:30A (MST)	1	X							1	\$290.00	\$290.00	KECI+KCPW Combo (KECI+KCPW)	MONTANA TODAY2	5/25/18
5.0	Normal Line / News	05/30/18-05/30/18	1	:30	6:30A- 7A (MST)	1				X				1	\$290.00	\$290.00	KECI+KCPW Combo (KECI+KCPW)	MONTANA TODAY3	5/25/18
6.0	Normal Line / News	05/31/18-05/31/18	1	:30	6:30A- 7A (MST)	1				X				1	\$290.00	\$290.00	KECI+KCPW Combo (KECI+KCPW)	MONTANA TODAY3	5/25/18
7.0	Normal Line / News	06/01/18-06/01/18	1	:30	6:30A- 7A (MST)	1					X			1	\$290.00	\$290.00	KECI+KCPW Combo (KECI+KCPW)	MONTANA TODAY3	5/25/18
8.0	Normal Line / News	06/04/18-06/04/18	1	:30	6:30A- 7A (MST)	1	X							1	\$290.00	\$290.00	KECI+KCPW Combo (KECI+KCPW)	MONTANA TODAY3	5/25/18
9.0	Normal Line / News	06/05/18-06/05/18	1	:30	6:30A- 7A (MST)	1		X						1	\$290.00	\$290.00	KECI+KCPW Combo (KECI+KCPW)	MONTANA TODAY3	5/25/18
10.0	Normal Line / News	06/01/18-06/01/18	1	:30	5P- 5:30P (MST)	1					X			1	\$460.00	\$460.00	KECI+KCPW Combo (KECI+KCPW)	NEWS AT 5	5/25/18
11.0	Normal Line / News	06/04/18-06/04/18	1	:30	5P- 5:30P (MST)	1	X							1	\$460.00	\$460.00	KECI+KCPW Combo (KECI+KCPW)	NEWS AT 5	5/25/18
12.0	Normal Line / News	05/30/18-05/30/18	1	:30	6P- 6:30P (MST)	1				X				1	\$540.00	\$540.00	KECI+KCPW Combo (KECI+KCPW)	News at 6pm	5/25/18
13.0	Normal Line / News	06/01/18-06/01/18	1	:30	6P- 6:30P (MST)	1					X			1	\$540.00	\$540.00	KECI+KCPW Combo (KECI+KCPW)	News at 6pm	5/25/18

## CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:

Date:

Accepted-Station:

Date:

Comments:

The parties intend for the Standard Advertiser Terms and Conditions ("Terms") located at: <http://bbg.net/typ=1224> ... to be part of their agreement, and the sale of advertising is expressly subject to said Terms.

# Contract # 3352683

Schedule Dates 05/30/18-06/05/18

Advertiser Principles First (124745)

Agency Nebo Media (10105)

Product POLITICAL ISSUE (1187)

Brand ISSUE ADVERTISING (218560)

Salesperson Katz/DC, Washington DC (4022)

Sales Office Katz Washington DC

Buyer Name TJ Osborne,

Phone/Fax /

CPE 358/446/4081

Account Types National/Political Issue Agency BRD

Billing Type Standard

Comments Issue Separation: 30

KECI+KCFW Combo  
340 West Main St  
Missoula, MT 59802



Nebo Media  
PO Box 9825  
Arlington, VA 22219

Date Entered 05/25/18  
Last Modified 05/25/18  
Entered By Leslie Stoll-Orrell  
CO-OP No  
Headline # ECR26016644  
Demo  
Order Type Normal  
Package Deal  
Commission % 15.00  
Commission \$1,305.00  
Net Total \$7,395.00  
Sales Tax

## KECI+KCFW Combo (KECI+KCFW)

By Broadcast Month Spots Rate  
Jun. 2018 24 \$8,700.00  
Grand Total: 24 \$8,700.00

Line	Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPW	Mo	Tu	We	Th	Fr	Sa	Su	Spots	Rate	Total	Station	Comments	Entered
14.0	Normal Line / News	06/04/18-06/04/18	1	:30	6P- 6:30P (MST)	1	X							1	\$900.00	\$900.00	KECI+KCFW Combo (KECI+KCFW)	News at 6pm	5/25/18
15.0	Normal Line / News	05/31/18-05/31/18	1	:30	10P- 10:35P (MST)	1				X				1	\$960.00	\$960.00	KECI+KCFW Combo (KECI+KCFW)	News at 10	5/25/18
16.0	Normal Line / News	06/04/18-06/04/18	1	:30	10P- 10:35P (MST)	1	X							1	\$960.00	\$960.00	KECI+KCFW Combo (KECI+KCFW)	News at 10	5/25/18
17.0	Normal Line / News	05/31/18-05/31/18	1	:30	4P- 5P (MST)	1				X				1	\$220.00	\$220.00	KECI+KCFW Combo (KECI+KCFW)	ELLEN	5/25/18
18.0	Normal Line / News	06/04/18-06/04/18	1	:30	4P- 5P (MST)	1	X							1	\$220.00	\$220.00	KECI+KCFW Combo (KECI+KCFW)	ELLEN	5/25/18
19.0	Normal Line / SPOT	05/31/18-05/31/18	1	:30	6:30P- 7P (MST)	1				X				1	\$300.00	\$300.00	KECI+KCFW Combo (KECI+KCFW)	Entertainment Tonight	5/25/18
20.0	Normal Line / SPOT	06/04/18-06/04/18	1	:30	6:30P- 7P (MST)	1	X							1	\$300.00	\$300.00	KECI+KCFW Combo (KECI+KCFW)	Entertainment Tonight	5/25/18
21.0	Normal Line / SPOT	05/31/18-05/31/18	1	:30	10:35P- 11:35P (MST)	1				X				1	\$290.00	\$290.00	KECI+KCFW Combo (KECI+KCFW)	Tonight Show	5/25/18
22.0	Normal Line / SPOT	06/04/18-06/04/18	1	:30	10:35P- 11:35P (MST)	1	X							1	\$290.00	\$290.00	KECI+KCFW Combo (KECI+KCFW)	Tonight Show	5/25/18
23.0	Normal Line / SPOT	06/04/18-06/04/18	1	:30	10:35P- 11:35P (MST)	1	X							1	\$290.00	\$290.00	KECI+KCFW Combo (KECI+KCFW)	Tonight Show	5/25/18
24.0	Normal Line / SPOT	05/02/18-05/02/18	1	:30	10:30P- 12A (MST)	1						X		1	\$900.00	\$900.00	KECI+KCFW Combo (KECI+KCFW)	SNL	5/25/18

## CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:
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The parties intend for the Standard Advertiser Terms and Conditions ("Terms") located at... <http://bbj.net/?p=1224> ... to be part of their agreement, and the sale of advertising is expressly subject to said Terms.



**KATZ TELEVISION**  
GROUP

125 West 56th St  
New York, NY 10019

Contract # 26016544  
CPE: 350/446/081  
Agency: NEBO MEDIA  
1911 N.FORT MYER  
DRIVE  
ARLINGTON, VA  
22209

Changes as of: 5/18/2018 at 1:46 PM  
Flight: 5/30/18 - 6/5/18  
Advertiser: Principles First PAC  
Product: Issue  
Agency Order #: 7363586  
Buyer: Osborne, TJ  
Salesperson: MATTHEW MULZOFF  
202-955-5342

Version: Original Order  
Station: KECI  
Market: Missoula  
Office: WASHINGTON  
Services: Nielsen  
Con Type: POLITICAL/NOTE  
Total \$: \$8,700.00  
Total Spots: 24  
Total CPP: \$0.00  
Total GRP: 0.0  
Traffic #: 3352683

Comments: Separation: 30

Separation:

#	Day/Time	DP	Program	Rate	Len	5/30	5/31	6/1	6/2	6/3	6/4	6/5	Total Spots	Total \$	CPP*	GRP*
1	W-F M-Tu 15:30p-6a		MONTANA TODAY1	\$210.00	30	0	1	0	0	0	0	0	1	\$210.00	\$0.00	0.0
2	W-F M-Tu 6a-8:30a		MONTANA TODAY2	\$290.00	30	1	0	1	0	0	1	0	3	\$870.00	\$0.00	0.0
3	W-F M-Tu 6:30a-7a		MONTANA TODAY3	\$290.00	30	1	1	1	0	0	1	1	5	\$1,450.00	\$0.00	0.0
4	W-F M-Tu 4:5p-5:30p		NEWS AT 5	\$460.00	30	0	0	1	0	0	1	0	2	\$920.00	\$0.00	0.0
5	W-F M-Tu 6p-6:30p		News at 6pm	\$540.00	30	1	0	1	0	0	1	0	3	\$1,620.00	\$0.00	0.0
6	W-F M-Tu 10p-10:35p		News at 10	\$660.00	30	0	1	0	0	0	1	0	2	\$1,320.00	\$0.00	0.0
7	W-F M-Tu 7:5p-8p		ELLEN	\$220.00	30	0	1	0	0	0	1	0	2	\$440.00	\$0.00	0.0
8	W-F M-Tu 8:30p-7p		Entertainment Tonight	\$300.00	30	0	1	0	0	0	1	0	2	\$600.00	\$0.00	0.0
9	W-F M-Tu 10:35p-11:35p		Tonight Show	\$290.00	30	0	1	1	0	0	1	0	3	\$870.00	\$0.00	0.0
10	Sa 10:30p-12m		SNL	\$400.00	30	0	0	0	1	0	0	0	1	\$400.00	\$0.00	0.0
TOTALS:						3	6	5	1	0	3	1	24	\$8,700.00	\$0.00	0.0



**KATZ TELEVISION**  
GROUP

125 West 55th St  
New York, NY 10019

Contract # 26016644  
CPE: 358/446/4081  
Agency: NEBO MEDIA  
1811 N. FORT MYER  
DRIVE  
ARLINGTON, VA  
22209

Changes as of: 5/18/2018 at 1:46 PM  
Flight: 5/30/18 - 6/5/18  
Advertiser: Principles First PAC  
Product: Issue  
Agency Order #: 7383588  
Buyer: Osborne, TJ  
Salesperson: MATTHEW MULZOFF  
202-955-5342  
Separation:

Version: Original Order  
Station: KECI  
Market: Missoula  
Office: WASHINGTON  
Service: Nielsen  
Primary Demo:  
Assistant: MATTHEW MULZOFF  
202-955-5342

Can Type: POLITICAL/CANOTE  
Total \$: \$8,700.00  
Total Spots: 24  
Total CPP: \$0.00  
Total GRP: 3352683  
Traffic #: 3352683

Special Instructions

Order Level Comments		
Date/Time	Added by	Comment
05/18/18 1:47 PM	MATTHEW MULZOFF	Separation: 30

Competitive Information	
Market Budget: \$23,514	
KECI Share: 37%	
Comment:	
KPAX: 60%	
KTFM: 3%	

Daypart Summary				
Day/Time	% Distrib	Spots	Dollars	GRP
Total	100%	24	\$8,700.00	0.0

Monthly Summary		
Month	Spots	Dollars
2018-Jun	24	\$8,700.00
Total	24	\$8,700.00

Transaction History				
Trans	Created/Received	Created by	Status	Spot
Queued for Electronic Contracting	5/25/18 10:12 AM			
New	5/18/18 1:46 PM	MATTHEW MULZOFF	New	24
			Contract \$	\$8,700.00
			Chg	\$0
			Comment	\$0

PARAGRAPHS 49 AND 50 OF THE UNITED STATES FEDERAL COMMUNICATIONS COMMISSION'S REPORT AND ORDER NO. 07-217 PROVIDES THAT BROADCAST STATIONS' ADVERTISING CONTRACTS WILL NOT DISCRIMINATE ON THE BASIS OF RACE OR ETHNICITY, AND MUST CONTAIN NONDISCRIMINATION CLAUSES. CONSISTENT WITH THIS ORDER, KATZ MEDIA GROUP (INCLUDING ANY SUBSIDIARY OR DIVISION OF KATZ) DOES NOT DISCRIMINATE IN ANY BROADCAST ADVERTISING CONTRACT ON THE BASIS OF RACE OR ETHNICITY AND EVALUATES, NEGOTIATES AND COMPLETES ITS BROADCAST ADVERTISING CONTRACTS WITHOUT REGARD TO RACE OR ETHNICITY.

## AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Station and Location: <u>KECI-MISSOULA/KALLISPELL</u>	Date: <u>5/25/18</u>
--	-------------------------

I, TJ Osborne

do hereby request station time concerning the following issue:

Principles First PAC
----------------------

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks

This broadcast time will be used by: Principles First PAC

**THIS PAGE MUST BE COMPLETED FOR PROGRAMMING THAT  
"COMMUNICATES A POLITICAL MATTER OF NATIONAL IMPORTANCE."  
FOR ALL OTHER ISSUE ADS, PLEASE GO TO PAGE 3.**

Programming that "communicates a political matter of national importance" includes (1) references to legally qualified candidates (presidential, vice presidential or congressional); (2) any election to Federal office (e.g., any references to "our next senator", "our person in Washington" or "the President"); and (3) a national legislative issue of public importance (e.g., Affordable Care Act, revising the IRS tax code, federal gun control or any federal legislation).

**Does the programming (in whole or in part) communicate "a message relating to any political matter of national importance?"**

☐ Yes

☒ No

For programming that "communicates a message relating to any political matter of national importance," list the name of the legally qualified candidate(s) the programming refers to, the offices being sought, the date(s) of the election(s) and/or the issue to which the communication refers (if applicable):

I represent that the payment for the above described broadcast time has been furnished by (name and address):

and you are authorized to announce the time as paid for by such person or entity (hereinafter referred to as the "sponsor").

List the chief executive officers or members of the executive committee or the board of directors below (or attach separately):

For programming that "communicates a message relating to any political matter of national importance," attach Agreed Upon Schedule (Page 5)

**THIS PAGE MUST BE COMPLETED FOR PROGRAMMING THAT  
DOES NOT "COMMUNICATE A POLITICAL MATTER OF NATIONAL  
IMPORTANCE"**

I represent that the payment for the above described broadcast time has been furnished  
by (name and address):

Principles First PAC

and you are authorized to announce the time as paid for by such person or entity  
(hereinafter referred to as the "sponsor").

List the chief executive officers or members of the executive committee or the board of  
directors below (or attach separately):

Randy Pullen

TO BE COMPLETED FOR ALL ISSUE ADVERTISEMENTS

THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.

The Sponsor agrees to indemnify and hold harmless the station for any damages or liability, including reasonable attorney's fees, that may ensue from the broadcast of the above-requested advertisement(s). For the above-stated broadcast(s), the sponsor also agrees to prepare a script, transcript, or tape, which will be delivered to the station at least \_\_\_\_\_ before the time of the scheduled broadcasts.

TO BE SIGNED BY ISSUE ADVERTISER (SPONSOR)

5/18/2018 TJ Osborne 2023375700  
Date Signature Contact Phone Number

TO BE SIGNED BY STATION REPRESENTATIVE

☒ Accepted ☐ Accepted in Part ☐ Rejected  
Signature Printed Name Title

## AGREED UPON SCHEDULE

**For All Issue Advertisements That Communicate a Message Relating to Any Political Matter of National Importance**

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks

**Attach proposed schedule with charges (if available):**

## AFTER AIRING OF BROADCASTS:

Attach Invoices or Schedule Run Summary to this Form showing:

- (1) actual air time and charges for each spot;
- (2) the date(s), exact time(s) and reason(s) for Make-Good(s), if any; and
- (3) the amount of rebates given (identify exact date, time, class of broadcast and dollar amount for each rebate), if any.

**Note:** Because the FCC requires that the political file contain the actual time the rate for spots "communicating a political matter of national importance" air, that information should be included in the file as soon as possible. If that information is only generated monthly, the file should include the name of a contact person who can provide the times that and rates for specific spots aired. The FCC's online political files include a folder for "Terms and Disclosures." NAB suggests that, for stations subject to the online public file rule, the names of contact person(s) be placed in that folder.

# 100th Anniversary

## ORDER

<b>Orders</b>	<b>Order / Rev:</b>	<b>131072</b>	
	<b>Alt Order #:</b>	<b>26016614</b>	
	<b>Product Desc:</b>	<b>Issue</b>	
	<b>Estimate:</b>	<b>4081</b>	
	<b>Flight Dates:</b>	<b>05/30/18 - 08/05/18</b>	<b>Primary AE:</b> <b>KTMF</b>
	<b>Original Date / Rev:</b>	<b>05/21/18 / 05/21/18</b>	<b>Sales Office:</b> <b>K-WDC</b>
	<b>Order Type:</b>	<b>GENERAL</b>	<b>Sales Region:</b> <b>NAT</b>
<b>Agency</b>	<b>Name:</b>	<b>Nabo Media</b>	
	<b>Buying Contact:</b>		<b>Billing Type:</b> <b>Cash</b>
	<b>Billing Contact:</b>		<b>Billing Calendar:</b> <b>Broadcast</b>
		<b>1911 North Ft Myer Drive Ste. 400</b>	<b>Billing Cycle:</b> <b>EOM/EOC</b>
		<b>Arlington, VA 22209</b>	<b>Agency Commission:</b> <b>15%</b>
<b>Advertiser</b>	<b>Name:</b>	<b>POL/Principles First PAC</b>	
	<b>Demographic:</b>	<b>HH</b>	<b>New Business Thru:</b>
	<b>Product Codes:</b>	<b>PL Issue</b>	<b>Advertiser External ID:</b>
	<b>Revenue Code 1:</b>	<b>AGY</b>	<b>Agency External ID:</b>
	<b>Revenue Code 2:</b>	<b>POL</b>	<b>Unit Code:</b> <b>General</b>
	<b>Revenue Code 3:</b>	<b>ISS</b>	<b>Order Separation:</b> <b>00:20:00</b>
	<b>Priority:</b>	<b>IS</b>	

## Bill Plan

Start Date	End Date	# Spots	Gross Amount	Net Amount
05/28/18	06/05/18	10	\$625.00	\$531.25

## Totals

Month	# Spots	Gross Amount	Net Amount	Rating
June 2018	10	\$625.00	\$531.25	0.00
<b>Totals</b>	<b>10</b>	<b>\$625.00</b>	<b>\$531.25</b>	<b>0.00</b>

## Account Executives

Account Executive	Sales Office	Sales Region	Start Date / End Date	Order %
Katz Washington DC			Start Of Order - End Of Order	100%

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
N 1	KTMF	05/30/18	06/30/18	M-F 11a-12p M-F 11a-12p	CM	11:00 AM-12:00 PM	--W----	:30	1	\$40.00	IS	0.00	NM	1	\$40.00
Millionaire <u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u> <u>Rating</u> Week: 05/28/18 06/03/18 --W---- 1 \$40.00 0.00															
N 2	KTMF	06/31/18	06/31/18	M-F 11a-12p M-F 11a-12p	CM	11:00 AM-12:00 PM	---T---	:30	1	\$40.00	IS	0.00	NM	1	\$40.00
Millionaire <u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u> <u>Rating</u> Week: 05/28/18 06/03/18 ---T--- 1 \$40.00 0.00															
N 3	KTMF	08/01/18	08/01/18	M-F 11a-12p M-F 11a-12p	CM	11:00 AM-12:00 PM	----F--	:30	1	\$40.00	IS	0.00	NM	1	\$40.00
Millionaire <u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u> <u>Rating</u> Week: 05/28/18 06/03/18 ----F-- 1 \$40.00 0.00															
N 4	KTMF	06/04/18	06/04/18	M-F 11a-12p M-F 11a-12p	CM	11:00 AM-12:00 PM	-----	:30	1	\$40.00	IS	0.00	NM	1	\$40.00
Millionaire <u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u> <u>Rating</u> Week: 06/04/18 06/10/18 ----- 1 \$40.00 0.00															
N 5	KTMF	08/05/18	08/05/18	M-F 11a-12p M-F 11a-12p	CM	11:00 AM-12:00 PM	-----	:30	1	\$40.00	IS	0.00	NM	1	\$40.00

Order / Rev: 131072  
 Alt Order #: 28016814  
 Flight Dates: 05/30/18 - 06/05/18

Advertiser: POL/Principles First PAC  
 Product Desc: Issue  
 Estimate: 4081  
 KTMTF

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
Millionaire															
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 05/04/18	05/10/18	-T-----		1				\$40.00		0.00			
N 6	KTMTF	05/30/18	05/30/18	M-F 4p-5p	CM	4:00 PM-4:30 PM	--W----	:30	1	\$75.00	IS	0.00	NM	1	\$75.00
				M-F 4p-5p		(4:00 PM-4:30 PM)									
	FAMILY FEUD														
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 05/28/18	05/03/18	--W----		1				\$75.00		0.00			
N 7	KTMTF	05/31/18	05/31/18	M-F 4p-5p	CM	4:00 PM-4:30 PM	---T---	:30	1	\$75.00	IS	0.00	NM	1	\$75.00
				M-F 4p-5p		(4:00 PM-4:30 PM)									
	FAMILY FEUD														
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 05/28/18	05/03/18	---T---		1				\$75.00		0.00			
N 8	KTMTF	06/01/18	06/01/18	M-F 4p-5p	CM	4:00 PM-4:30 PM	----F--	:30	1	\$75.00	IS	0.00	NM	1	\$75.00
				M-F 4p-5p		(4:00 PM-4:30 PM)									
	FAMILY FEUD														
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 05/28/18	05/03/18	----F--		1				\$75.00		0.00			
N 9	KTMTF	06/04/18	06/04/18	M-F 4p-5p	CM	4:00 PM-4:30 PM	M-----	:30	1	\$75.00	IS	0.00	NM	1	\$75.00
				M-F 4p-5p		(4:00 PM-4:30 PM)									
	FAMILY FEUD														
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 06/04/18	06/10/18	M-----		1				\$75.00		0.00			
N 10	KTMTF	05/31/18	05/31/18	M-F GMA 7a-9a	CM	8:00 AM-9:00 AM	---T---	:30	1	\$125.00	IS	0.00	NM	1	\$125.00
				M-F 7a-9a		(8:00 AM-9:00 AM)									
	GD MRN AMR-ABC<														
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 05/28/18	06/03/18	---T---		1				\$125.00		0.00			
													Totals	10	\$625.00

20180521110908

**KATZ TELEVISION GROUP**

Contract # 26016814  
CPE: 3584484081  
Agency: NEBO MEDIA  
1911 N FORT  
DRIVE  
ARLINGTON, VA  
22209

Changes as of: 5/18/2018 at 1:34 PM  
Flight: 5/30/18 - 6/5/18  
Advertiser: Principles First PAC  
Product: Issue  
Agency Order #: 7363587

**Version:** Current State Version 1  
**Station:** KTMF  
**Market:** Missoula  
**Office:** WASHINGTON  
**Service:** Nielsen  
**Buy Demo:**  
**Assistant:** SAMUEL LITTLE  
202-955-5342

**Con Type: POLITICAL/VOTE**  
**Total \$: \$625.00**

**Total Spots: 10**

**Total CPP: \$0.00**

**Total GRP:**

**Primary Demo:** SAMUEL LITTLE  
**Assistant:** 202-855-5342

**Comments: Separation: 30**

### Separation:

#	Day/Time	DP	Program	Rate	Len	5/30 - 6/5										Total Spots	Total \$	CPP*	GRP*
						5/30	5/31	6/1	6/2	6/3	6/4	6/5							
1	W-F M-Tu 11a-12n		Millionaire	\$40.00	30	1	1	0	0	1	1				5	\$200.00	\$0.00	0.0	
2	W-F M-Tu 24p-430p		FAMILY FEUD	\$75.00	30	1	1	0	0	1	0				4	\$300.00	\$0.00	0.0	
3	W-F M-Tu 38a-9a		GD MRN AMR-ABC<	\$125.00	30	0	1	0	0	0	0				1	\$125.00	\$0.00	0.0	
TOTALS:						2	3	2	0	0	2	1			10	\$625.00	\$0.00	0.0	



**KATZ TELEVISION GROUP**

**125 West 55th St  
New York, NY 10018**

Contract # 26D16614	Changes as of: 5/18/2018 at 11:34 PM	Version: Current State: Version 1
---------------------	--------------------------------------	-----------------------------------

**CPE: 358/446/4081**  
**Agency: NEBO MEDIA**

1911 N. FORT MYER  
DRIVE  
ARLINGTON, VA  
22208

**Changes as of: 5/18/2018 at 1:34 PM**

**Flight 53018 - 6/5/18**

**Advertiser:** Principles First PAC  
**Product:** Issue

**Office: WASHINGTON**

Service: Nielsen

**Primary Demo:** **SAMUEL LITTLE**  
**Assistant** 202-955-5342

**Buyer:** Osborne, TJ  
**Salesperson:** SAMUEL LITTLE  
202-955-5342

**Con Type: POLITICAL NOTE**  
**Total \$: \$625.00**

**Total Spots: 10**

**Total CPP: \$0.00****Total GRP:**

**Supernatural  
Tapes**

Date/Time	Added by	Comment
05/18/18 1:34 PM	SAMUEL LITTLE	Separation: 30

### Competitive Information.

Market Budget:	\$20.833
KTMF Share:	3%
Comment:	
KECI:	37%
KPAX:	60%

## **Däyapart Summary:**

Day/Time	% Distrib	Spots	Dollars	CPP	GRP
	100%	10	\$825.00	N/A	0.0
<b>Total</b>	100%	10	\$825.00	N/A	0.0

## Monthly Summary

Month	Spots	Dollars
2018-Jun	10	\$625.00
<b>Total</b>	<b>10</b>	<b>\$625.00</b>

### Transaction History

Trans.	Created/Received	Created by	Status	Spot++	Spot-	\$ Chg	Contract \$	Command
Queued for Electronic Contracting	5/18/18 1:44 PM					\$0	\$0	
New	5/18/18 1:25 PM	SAMUEL LITTLE	New	10		\$625.00	\$825.00	

## Non-Discrimination Policy

PARAGRAPHS 49 AND 50 OF THE UNITED STATES FEDERAL COMMUNICATIONS COMMISSION'S REPORT AND ORDER NO. 07-217 PROVIDES THAT BROADCAST STATIONS' ADVERTISING CONTRACTS WILL NOT DISCRIMINATE ON THE BASIS OF RACE OR ETHNICITY, AND MUST CONTAIN NONDISCRIMINATION CLAUSES, CONSISTENT WITH THIS ORDER. KATZ MEDIA GROUP (INCLUDING ANY SUBSIDIARY OR DIVISION OF KATZ) DOES NOT DISCRIMINATE IN ANY BROADCAST ADVERTISING CONTRACT ON THE BASIS OF RACE OR ETHNICITY AND EVALUATES, NEGOTIATES AND COMPLETES ITS BROADCAST ADVERTISING CONTRACTS WITHOUT REGARD TO RACE OR ETHNICITY.

## AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

<b>Station and Location:</b> KAMF-TV, Missoula, MT	<b>Date:</b> 5/21/18
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I, TJ Osborne

do hereby request station time concerning the following issue:

Principles First PAC
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Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks

This broadcast time will be used by: Principles First PAC

**THIS PAGE MUST BE COMPLETED FOR PROGRAMMING THAT  
"COMMUNICATES A POLITICAL MATTER OF NATIONAL IMPORTANCE."  
FOR ALL OTHER ISSUE ADS, PLEASE GO TO PAGE 3.**

Programming that "communicates a political matter of national importance" includes (1) references to legally qualified candidates (presidential, vice presidential or congressional); (2) any election to Federal office (e.g., any references to "our next senator", "our person in Washington" or "the President"); and (3) a national legislative issue of public importance (e.g., Affordable Care Act, revising the IRS tax code, federal gun control or any federal legislation).

**Does the programming (in whole or in part) communicate "a message relating to any political matter of national importance?"**

☒ Yes

☐ No

For programming that "communicates a message relating to any political matter of national importance," list the name of the legally qualified candidate(s) the programming refers to, the offices being sought, the date(s) of the election(s) and/or the issue to which the communication refers (if applicable):

I represent that the payment for the above described broadcast time has been furnished by (name and address):

and you are authorized to announce the time as paid for by such person or entity (hereinafter referred to as the "sponsor").

List the chief executive officers or members of the executive committee or the board of directors below (or attach separately):

For programming that "communicates a message relating to any political matter of national importance," attach Agreed Upon Schedule (Page 5)

**THIS PAGE MUST BE COMPLETED FOR PROGRAMMING THAT  
DOES NOT "COMMUNICATE A POLITICAL MATTER OF NATIONAL  
IMPORTANCE"**

I represent that the payment for the above described broadcast time has been furnished  
by (name and address):

Principles First PAC

and you are authorized to announce the time as paid for by such person or entity  
(hereinafter referred to as the "sponsor").

List the chief executive officers or members of the executive committee or the board of  
directors below (or attach separately):

Randy Pullen

**TO BE COMPLETED FOR ALL ISSUE ADVERTISEMENTS**

**THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.**

The Sponsor agrees to indemnify and hold harmless the station for any damages or liability, including reasonable attorney's fees, that may ensue from the broadcast of the above-requested advertisement(s). For the above-stated broadcast(s), the sponsor also agrees to prepare a script, transcript, or tape, which will be delivered to the station at least \_\_\_\_\_ before the time of the scheduled broadcasts.

**TO BE SIGNED BY ISSUE ADVERTISER (SPONSOR)**

**5/18/2018**

Date

**T.J. Osborne**

Signature

Digitally Signed by: T.J. Osborne  
Date: 2018.05.18 14:00:04

**2023375700**

Contact Phone Number

**TO BE SIGNED BY STATION REPRESENTATIVE**

☒ Accepted

☐ Accepted in Part

☐ Rejected

**Katie Delamy**

Signature

**Katie Delamy**

Printed Name

**NSM**

Title

## AGREED UPON SCHEDULE

**For All Issue Advertisements That Communicate a Message Relating to Any Political Matter of National Importance**

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks

**Attach proposed schedule with charges (if available):**

## AFTER AIRING OF BROADCASTS:

Attach Invoices or Schedule Run Summary to this Form showing:

- (1) actual air time and charges for each spot;
- (2) the date(s), exact time(s) and reason(s) for Make-Good(s), if any; and
- (3) the amount of rebates given (identify exact date, time, class of broadcast and dollar amount for each rebate), if any.

**Note:** Because the FCC requires that the political file contain the actual time the rate for spots "communicating a political matter of national importance" air, that information should be included in the file as soon as possible. If that information is only generated monthly, the file should include the name of a contact person who can provide the times that and rates for specific spots aired. The FCC's online political files include a folder for "Terms and Disclosures." NAB suggests that, for stations subject to the online public file rule, the names of contact person(s) be placed in that folder.

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: March 4, 2019

ANALYST: Kaitlin Seufert

I. COMMITTEE: Principles First, Inc.  
C00679449  
Randall Lee Pullen, Treasurer  
8687 E. Via De Ventura  
Suite 106  
Scottsdale, AZ 85258

II. RELEVANT STATUTE: 52 U.S.C. §30104(g)(1)  
11 CFR §104.4(c)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)**

Principles First, Inc. ("the Committee), failed to timely file one (1) 24-Hour Report totaling \$65,150.00 to support two (2) independent expenditures disclosed on the 2018 July Quarterly Report, made after the 20<sup>th</sup> day but more than 24 hours before the 2018 Primary Election held in the state of Montana (Attachment 2).

On July 6, 2018, Randy Pullen, the Committee treasurer, called the Reports Analysis Division (RAD) Analyst. Mr. Pullen explained he was unable to successfully file a 24-Hour Report in May, and was also having trouble filing the 2018 July Quarterly Report. The Analyst assisted Mr. Pullen in creating the July Quarterly Report in the software, and encouraged him to file the 24-Hour Report as soon as possible as it was already late. The Analyst provided Mr. Pullen with several resources for reporting independent expenditures (Attachment 3).

On July 6, 2018, the Committee filed its 2018 July Quarterly Report, covering the period from May 14, 2018 through June 30, 2018, which included a Schedule E (Itemized

Independent Expenditures) disclosing two (2) independent expenditures, totaling \$65,150.00, made in support of one (1) federal candidate (Image 201807069115244750).

Also on July 6, 2018, the Committee filed an Amended 2018 July Quarterly Report. The report contained no changes to Schedule E from the original report (Image 201807069115245088).

On July 7, 2018, the Committee filed an Amended 2018 July Quarterly Report. The report disclosed modifications to the date of dissemination and date of disbursement for one (1) Independent Expenditure, but no other changes to Schedule E from the original report (Image 201807079115247459).

Also on July 7, 2018, the Committee filed one (1) 24-Hour Report to support (2) independent expenditures totaling \$65,150.00 disseminated on May 18, 2018 (Image 201807079115247450).

On October 3, 2018, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2018 July Quarterly Report, received July 7, 2018. The RFAI noted that the Committee may have failed to timely file one (1) or more required 24-Hour Reports regarding independent expenditures. A chart was included with the RFAI identifying the two (2) independent expenditures, totaling \$65,150.00, for which a 24-Hour Report had not been timely filed (Image 201810030300021116).

On October 16, 2018, while speaking with Mr. Pullen regarding a separate matter, the Analyst reminded Mr. Pullen of the RFAI that was sent to the Committee referencing the Amended 2018 July Quarterly Report, received July 7, 2018. Mr. Pullen responded that he had given the letter to the Committee's attorney to respond (Attachment 3).

On November 9, 2018 the RAD Analyst left a voicemail message for Mr. Pullen. The Analyst explained that the issue on the Committee's Amended 2018 July Quarterly Report, received July 7, 2018, may be referred for potential further action to another office within the Commission. The Analyst further explained the Committee could provide additional information for the public record if they wished to do so. Later that day, Mr. Pullen returned the Analyst's call and said the Committee would file a response (Attachment 3).

On November 14, 2018, Mr. Pullen called the RAD Analyst to ask where he should mail the Committee's response to the RFAI sent referencing the Amended 2018 July Quarterly Report. The Analyst explained that because the Committee files electronically, they are required to file their response electronically via FEC Form 99 (Miscellaneous Electronic Submission) (Attachment 3).

Also on November 14, 2018, Mr. Pullen spoke with the RAD Analyst and stated that the Committee had emailed a response to the referable issue within the Amended 2018 July Quarterly Report to a contact in the Office of General Counsel (OGC). Mr. Pullen said it was in response to the Matter Under Review (MUR) being handled by OGC as the result of an outside complaint. The Analyst explained that the Committee should file any

response to the RFAI electronically via an FEC Form 99 so that it would be on the public record (Attachment 3).

Later on November 14, 2018, the Committee filed an FEC Form 99, which stated in part:

"In reference to your letter dated October 3, 2018, I would like to apologize for not filing timely Form 24 reports for the 2018 Montana Senate primary election on behalf of Principles First, Inc. I did not willfully or intentionally not file the 24-hour reports. I did experience problems with entering transactions in the electronic filing software, which precluded me from filing the reports.

After filing the Form 1 in May, I tried to file on the same day a Form 24 report, but the software would not accept the expenditures. At first, I thought the problem was I needed to wait a day until the Form 1 was processed. After trying a couple of times the following day, I contacted the FEC technical department and left a message that I was having problems. I did not hear back from them.

I did speak to an FEC Analyst in June, when attempting to file a monthly report for May. Since I had missed filing the Form 24 reports, I was trying to file a monthly report for May. I talked through the same problem I was having with the monthly report and earlier with the Form 24 reports. The issue was the software was not accepting the expenditures. The Analyst could not determine what was the cause of the problems I was experiencing. However, she did explain to me that I did not need to file a monthly report and a quarterly report would be ok for a small PAC.

I did continue to try and find a way to enter the expenditures in the software. The problem seemed to be every time I tried to input the candidate's name that the expenditure supported, the transaction was rejected. I reviewed the electronic filing instructions several times and was unable to find a solution in the instructions provided by the FEC.

Eventually, I tried adding the candidate benefited by the independent expenditure under the Individuals/Organizations and Events tab. Once I entered the candidate committee for Mr. Fagg, I was able to complete the expenditures to support the candidate and filed a quarterly report. This instruction - that you first must add the candidate to the Individuals/Organizations and Events tab before you could file the independent expenditure report - is not necessarily intuitive from the software and should have been noted in the electronic filing instructions from the FEC" (Image 201811149133679207).

To date, no further communications have been received from the Committee regarding this matter.

O-Index (2019-2020)													
Cmte. ID: C00679449 Cmte. Name: PRINCIPLES FIRST, INC.													
Treasurer Name: PULLEN, RANDALL LEE Address: 8687 E. VIA DE VENTURA SUITE 106, SCOTTSDALE, AZ 85258													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER													
Form Tp	Rpt Tp	All	Receipt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits & Loans

No records were found for this cycle.

O-Index (2017-2018)													
Cmte. ID: C00679449 Cmte. Name: PRINCIPLES FIRST, INC.													
Treasurer Name: PULLEN, RANDALL LEE Address: 8687 E. VIA DE VENTURA SUITE 106, SCOTTSDALE, AZ 85258													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER													
Form Tp	Rpt Tp	All	Receipt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits & Loans
MS-T			11/14/2018	1	201811149133679207								
RQ2	Q2	A	10/3/2018	3	201810030300021116	5/14/2018	6/30/2018	10/3/2018					
RQ2	TER	T	10/28/2018	2	201810280300022876	7/1/2018	9/30/2018	10/28/2018					
F3XN	Q2	N	7/6/2018	9	201807069115244742	5/14/2018	6/30/2018		\$0	\$90,000	\$86,154	\$3,845	\$0
F3XA	Q2	A	7/6/2018	9	201807069115245080	5/14/2018	6/30/2018		\$0	\$90,000	\$86,154	\$3,845	\$0
F3XA	Q2	A	7/7/2018	9	201807079115247451	5/14/2018	6/30/2018		\$0	\$90,000	\$86,154	\$3,845	\$0
F3XT	TER	T	10/18/2018	6	201810189125612299	7/1/2018	9/30/2018		\$3,845	\$0	\$0	\$0	\$0
F3XN	30G	N	12/7/2018	5	201812079142253046	10/1/2018	11/26/2018		\$0	\$0	\$0	\$0	\$0
F3XN	YE	N	1/4/2019	5	201901049143729439	11/27/2018	12/31/2018		\$0	\$0	\$0	\$0	\$0
F1A		A	6/19/2018	5	201806199113758345								
F1A		A	6/19/2018	4	201806199113758587								
F1N		N	5/23/2018	5	201805239113318648								
F24N	24		7/7/2018	1	201807079115247450								
Totals										\$90,000	\$90,000		

O-Index (2015-2016)													
Cmte. ID: C00679449 Cmte. Name: PRINCIPLES FIRST, INC.													
Treasurer Name: PULLEN, RANDALL LEE Address: 8687 E. VIA DE VENTURA SUITE 106, SCOTTSDALE, AZ 85258													
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER													
Form Tp	Rpt Tp	All	Receipt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits & Loans

No records were found for this cycle.

**Principles First, Inc. (C00679449)**

Amended 2018 July Quarterly Report, received July 7, 2018

**24-Hour Reports Not Timely Filed**

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported	State and Date of Election	24-Hour Report Filed
Intrepid Global Strategies, LLC	5/18/2018	\$5,150.00	Russell C Fagg	Montana - 2018 Primary (6/5/2018)	7/7/2018
Nebo Media, Inc.	5/18/2018	\$60,000.00 <i>24-Hour Report Required</i>	Russell C Fagg	Montana - 2018 Primary (6/5/2018)	7/7/2018