RECEIVED
FEC MAIL CENTER
2018 OCT 22 PM 3: 05

BEFORE THE FEDERAL ELECTION COMMISSION

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

GIFFORDS
P.O. Box 51196
Washington, DC 20091
(571) 295-7807

v. MUR No. 7524

2018 OCT 23 AM 10: 18
OFFICE OF
GENERAL COUNSEL

NATIONAL RIFLE ASSOCIATION
OF AMERICA POLITICAL VICTORY FUND
Robert G. Owens, Treasurer
11250 Waples Mill Road
Fairfax, VA 22030

JOSH HAWLEY FOR SENATE
Salvatore Purpura. Treasurer
150 Long Road, Suite 50
Chesterfield, MO 63005

COMPLAINT

1. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that the National Rifle Association of America Political Victory Fund ("NRA-PVF") (ID:C00053553) and Josh Hawley for Senate (ID:C00652727) have violated the Federal Election Campaign Act ("FECA"), 52 U.S.C. § 30101, *et seq*.

2. The NRA-PVF and Josh Hawley for Senate appear to have engaged in an elaborate scheme designed to evade detection of violations of the Commission's common vendor coordination rules. OnMessage, Inc. ("OnMessage"), led by Josh Hawley for Senate's top campaign consultant, appears to have deliberately routed the NRA-PVF's independent expenditures

supporting Hawley through the corporate shell of Starboard Strategic, Inc. ("Starboard"), which is functionally indistinguishable from OnMessage. Then, the NRA-PVF's pro-Hawley communications were distributed and placed by employees of the firm National Media Research Planning and Placement, LLC ("National Media") under a trade name, while Josh Hawley for Senate placed its own communications using National Media or an affiliate. In at least one instance, the same National Media official placed advertisements on behalf of both the NRA-PVF and Josh Hawley for Senate on the same stations and on the same day. The coordinated nature of this scheme is further demonstrated by the fact that all of the relevant companies or shell companies are located or have been paid at the same Virginia address.

3. As a result, there is reason to believe that the NRA-PVF made illegal, unreported, and excessive in-kind contributions to Josh Hawley for Senate in the form of coordinated communications, 11 C.F.R. § 109.21, in violation of FECA's source prohibitions, reporting requirements, and contribution limits.

4. "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).

5. 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.

6. Giffords is a nonpartisan, nonprofit 501(c)(4) organization headquartered in Washington, D.C.[1] Founded by former Congresswoman Gabrielle Giffords and retired Navy combat veteran and NASA astronaut Captain Mark Kelly, Giffords researches, writes, and proposes policies designed to reduce gun violence and mobilizes voters and lawmakers in support of safer gun laws. Giffords educates political candidates about issues and policies related to gun violence, and endorses candidates for local, state, and federal office who support strong gun-violence-prevention laws. Many candidates supported by Giffords, including the opponents of Thom Tillis and Corey Gardner in their 2014 campaigns for U.S. Senate and the opponent of Ron Johnson in his 2016 campaign for U.S. Senate, are opposed by the NRA-PVF and the National Rifle Institute for Legislative Action ("NRA-ILA").[2]

FACTS

7. The NRA-PVF is the National Rifle Association of America's lobbyist/registrant PAC.[3]

8. Josh Hawley is a candidate for U.S. Senate in Missouri. Josh Hawley for Senate is his authorized campaign committee.[4] Bradley "Brad" Todd—a partner at the consulting firms OnMessage and Starboard Strategic[5]—is Hawley's campaign consultant.[6]

---

[1] Giffords was founded in 2013 under the name Americans for Responsible Solutions, and was renamed Giffords in October 2017.

[2] Giffords has a sister organization, Giffords Law Center to Prevent Gun Violence, a nonprofit, nonpartisan 501(c)(3) based in San Francisco that works to research, write, enact, and defend laws, policies, and programs proven to reduce gun violence and save lives. Giffords' political action committee, Giffords PAC, works to support candidates and elected officials who promote policies to reduce gun violence and oppose the influence of the gun industry and the NRA, including by making political contributions and independent expenditures.

[3] National Rifle Association of America Political Victory Fund, Statement of Organization, FEC Form 1, at 2, 3 (amended Sept. 5, 2018), http://docquery.fec.gov/pdf/507/201809059121558507/201809059121558507.pdf.

[4] Josh Hawley for Senate, Statement of Organization, FEC Form 1, at 2 (amended Sept. 12, 2018), http://docquery.fec.gov/pdf/149/201809190200727149/201809190200727149.pdf.

[5] *See, e.g.*, Mike Spies, *The Mystery Firm That Became the NRA's Top Election Consultant*, POLITICO (July 13, 2018), https://www.politico.com/magazine/story/2018/07/13/mystery-firm-nra-consultant-219004; *see also infra* notes 19-24.

[6] *See* Tarini Parti & Henry Gomez, *Expanding Front in the Republicans' Culture Wars: The NFL*, BUZZFEED NEWS (Sept. 5, 2018), https://www.buzzfeednews.com/article/tariniparti/nfl-protests-football-republicans-midterm-elections; *see also* Lindsay Wise & Ben Wieder, *Hawley signals a Senate run and Democrats quickly cry foul*, MCCLATCHY (Aug. 3, 2017), https://www.mcclatchydc.com/news/politics-government/article165290077.html. In

9. On October 9, 2018, *The Trace* reported that the NRA-PVF had been routing its independent expenditures supporting Hawley through Starboard, while Josh Hawley for Senate had been contracting with OnMessage.[7]

Facts Relevant to OnMessage and Starboard Strategic

10. OnMessage is a political consulting firm that has performed contracting work for dozens of campaigns and political committees. The *Washington Post* recently called OnMessage "a powerhouse GOP consulting firm."[8]

11. OnMessage was registered in Virginia on April 13, 2005,[9] and was incorporated in Maryland on April 20, 2006.[10] Its website provides detailed information about its staff, past clients, and portfolio of work.[11]

12. In the 2010 election cycle, the NRA-PVF reported paying OnMessage over $4.5 million, primarily for television and radio ad production,[12] including approximately $3.2 million for federal independent expenditures,[13] according to reports filed with the Commission.

2016, Hawley's state attorney general campaign had also contracted with OnMessage; according to a 2017 *McClatchy* news article, "Ninety percent of the $8.7 million Hawley's state campaign committee spent before Election Day last year went to OnMessage Inc. for advertising and research." *Id.*

[7] Mike Spies, *NRA Continues to Use Mystery Firm in Latest Round of Election Spending,* THE TRACE (Oct. 9, 2018), https://www.thetrace.org/rounds/nra-continues-to-use-mystery-firm-in-election-spending/.

[8] James Hohmann, *The Daily 202: Trump voters stay loyal because they feel disrespected*, WASH. POST (May 14, 2018), https://www.washingtonpost.com/news/powerpost/paloma/daily-202/2018/05/14/daily-202-trump-voters-stay-loyal-because-they-feel-disrespected/5af8aac530fb0425887994cc/?utm_term=.8cfa8c40d816.

[9] *OnMessage, Inc.*, Commonwealth of Virginia State Corporation Commission, https://sccefile.scc.virginia.gov/Business/0636043 (last visited Oct. 19, 2018).

[10] *OnMessage, Inc.: General Information*, Maryland Business Express, https://egov.maryland.gov/BusinessExpress/EntitySearch/BusinessInformation/F11249893 (last visited Oct. 19, 2018).

[11] ONMESSAGE, INC., https://onmessageinc.com/ (last visited Oct. 19, 2018).

[12] National Rifle Association of America Political Victory Fund, Disbursements to OnMessage, Inc., 2009-10, Some of these Schedule B disbursements are described as "independent expenditure," but the underlying report suggests the expenditures were in connection with state, not federal, candidates.

[13] National Rifle Association of America Political Victory Fund, Independent Expenditures to OnMessage, Inc. (regularly scheduled reports), 2009-10, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&is_notice=true&payee_name=onmessage&max_date=12%2F31%2F2010.

13. In the 2012 election cycle, the NRA-PVF reported paying OnMessage $7.7 million for independent expenditures[14] and $42,866 in other disbursements.[15] All of the independent expenditure payments were for "Advertising Expenses," and the other disbursements were also for television and radio advertising expenses.

14. Also in the 2012 election cycle, the NRA-ILA—a tax-exempt organization under Section 501(c)(4) of the Internal Revenue Code that describes itself as "the lobbying arm of the NRA,"[16] and which reports independent expenditures to the Commission under ID C90013301[17]—reported paying OnMessage over $3.5 million for independent expenditures described as "Advertising Expenses."[18]

15. On March 22, 2013, Starboard was incorporated in Virginia by OnMessage officials.[19] The incorporation certificate lists five directors: Brad Todd, Curtis Anderson, Wesley Anderson, Graham Shafer, and Timothy Teepell.[20] At the time, three of those directors—Anderson,

---

[14] National Rifle Association of America Political Victory Fund, Independent Expenditures to OnMessage, Inc. (regularly scheduled reports), 2011-12, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&cycle=2012&is_notice=false&payee_name=onmessage&min_date=01%2F01%2F2011&max_date=12%2F31%2F2012.

[15] National Rifle Association of America Political Victory Fund, Disbursements to OnMessage, Inc., 2011-12, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2012&data_type=processed&committee_id=C00053553&recipient_name=onmessage&min_date=01%2F01%2F2011&max_date=12%2F31%2F2012.

[16] NATIONAL RIFLE ASSOCIATION INSTITUTE FOR LEGISLATIVE ACTION, https://www.nraila.org/ (last visited Oct. 19, 2018).

[17] National Rifle Association Institute for Legislative Action, Financial Summary, 2015-16, https://www.fec.gov/data/committee/C90013301/?cycle=2016.

[18] National Rifle Association Institute for Legislative Action, Independent Expenditures to On Message, Inc. (regularly scheduled reports), 2011-12, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C70000716&committee_id=C90013301&cycle=2012&is_notice=true&payee_name=message&min_date=01%2F01%2F2011&max_date=12%2F31%2F2012. The address given for OnMessage, Inc. on the NRA-ILA's 2012 reports is 815 Slaters Lane in Alexandria, Virginia, which was the firm's address at that time. *See* archived version of OnMessage.com (April 5, 2012), https://web.archive.org/web/20120405025059/https://onmessageinc.com (listing OnMessage's address at 815 Slaters Lane). This is also the address on OnMessage's corporate registration. *See OnMessage, Inc.*, Commonwealth of Virginia State Corporation Commission, *supra* note 9.

[19] *Articles of Incorporation: Starboard Strategic, Inc.*, Commonwealth of Virginia State Corporation Commission (Mar. 22, 2013) (attached as Exhibit A).

[20] *Id.*

Anderson, and Todd—were also directors at OnMessage.[21] By the following year, 2014, Shafer and Teepell had been added to OnMessage's board, as was Orrin "Guy" Harrison;[22] Harrison, in turn, was added to Starboard's board the year after, in 2015.[23] Both Starboard's and OnMessage's boards still consist of these same six directors (Anderson, Anderson, Todd, Shafer, Teepell, and Harrison).[24] Starboard's registered agent, Craig M. Palik, is also the registered agent for OnMessage Holdings, Inc.[25]

16. According to a recent *POLITICO* article, "[i]nternal emails indicate executives toggled between roles" at both Starboard and OnMessage, and that "none of Starboard's partners has publicly affiliated himself with the company; four of them have LinkedIn pages, for instance, and their profiles only mention OnMessage."[26]

17. In the 2014 election cycle, the NRA-PVF and the NRA-ILA paid Starboard approximately $20.5 million combined: the NRA-PVF paid Starboard $12.54 million for independent expenditures,[27] and $1.38 million in other disbursements,[28] and the NRA-ILA paid Starboard

---

21 *See 2013 Annual Report: OnMessage, Inc.* Commonwealth of Virginia State Corporation Commission (Mar. 9, 2013) (attached as Exhibit B).

22 *See 2014 Annual Report: OnMessage, Inc.* Commonwealth of Virginia State Corporation Commission (Jun. 2, 2014) (attached as Exhibit C).

23 *See 2015 Annual Report: Starboard Strategic, Inc.* Commonwealth of Virginia State Corporation Commission (Feb. 24, 2015) (attached as Exhibit D).

24 *See Starboard Strategic, Inc.*, 2018 Annual Report (Feb. 24, 2018) (attached as Exhibit E); *OnMessage, Inc.*, 2018 Annual Report (Feb. 27, 2018) (attached as Exhibit F).

25 *See* Exhibit A; *see also OnMessage Holdings, Inc.*, Commonwealth of Virginia State Corporation Commission, https://sccefile.scc.virginia.gov/Business/0770961 (last visited Oct. 19, 2018).

26 Mike Spies, *The Mystery Firm That Became the NRA's Top Election Consultant*, POLITICO (July 13, 2018), https://www.politico.com/magazine/story/2018/07/13/mystery-firm-nra-consultant-219004.

27 National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. (regularly scheduled reports), 2013-14, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&is_notice=false&payee_name=starboard&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

28 National Rifle Association of America Political Victory Fund, Disbursements to Starboard Strategic, Inc., 2013-14, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2014&data_type=processed&committee_id=C00053553&recipient_name=starboard&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

$6.6 million for independent expenditures.[29] Neither the NRA-PVF nor NRA-ILA reported any payments to OnMessage during the 2014 cycle.[30]

18. The NRA-PVF reported paying Starboard for expenses related to television, radio, and digital advertising in the 2014 cycle. The address reported for each Starboard disbursement was 705 Melvin Avenue #105 in Annapolis, Maryland,[31] the same address and suite number as OnMessage's Maryland office.[32]

19. The NRA-ILA also reported paying Starboard for "Advertising Expenses" in the 2014 cycle. The address reported for each Starboard disbursement was 817 Slaters Lane in Alexandria, Virginia,[33] the same address as OnMessage's Virginia office.[34]

20. The NRA's 2014 "focus" included "three major Senate races," and was aimed at "boosting Republican Senate challengers in Arkansas, Colorado and North Carolina," according to published reports.[35] Reports filed with the Commission show that the NRA-PVF supported candidates in these U.S. Senate races—Tom Cotton, Cory Gardner, and Thom Tillis—with

---

[29] National Rifle Association Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. (regularly scheduled reports), 2013-14, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C70000716&committee_id=C90013301&is_notice=false&payee_name=starboard&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

[30] The NRA-PVF and NRA-ILA may have continued using OnMessage for some of its work aside from federal independent expenditures. For example, OnMessage was a finalist for a Reed Award for its production of the NRA-ILA's 2014 ad, "Insult." *2015 Reed Award Finalists*, Campaigns & Elections, https://www.campaignsandelections.com/campaign-insider/2015-reed-award-finalists (last visited June 15, 2018). The ad attacked New York City mayor Michael Bloomberg and ran nationally on cable television, as well as on broadcast stations in Colorado. Fredreka Schouten, *Exclusive: NRA launches anti-Bloomberg ad campaign*, USA TODAY (Aug. 19, 2014), https://www.usatoday.com/story/news/politics/2014/08/19/nra-ad-campaign-targets-michael-bloomberg/14296467/. However, OnMessage also took credit for federal independent expenditures for which the NRA-PVF and NRA-ILA had paid Starboard. *See infra* ¶¶ 26-27.

[31] *See, e.g.*, National Rifle Association of America Political Victory Fund, Itemized Independent Expenditures, Monthly Report for September 2014, FEC Form 3X, at 758 (amended Dec. 4, 2014), http://docquery.fec.gov/cgi-bin/fecimg/?14952928564.

[32] ONMESSAGE, INC., https://onmessageinc.com/ (last visited Oct. 19, 2018).

[33] *See, e.g.*, National Rifle Association Institute for Legislative Action, Itemized Independent Expenditures, January 31 Year-End Report, FEC Schedule 5-E, at 64 (filed Jan. 30, 2015), http://docquery.fec.gov/cgi-bin/fecimg/?15950524359.

[34] ONMESSAGE, INC., https://onmessageinc.com/ (last visited Oct. 19, 2018).

[35] Kevin Bohn, *NRA focuses on three major Senate races*, CNN (Sept. 17, 2014), https://www.cnn.com/2014/09/17/politics/nra-senate-races/index.html.

independent expenditures contracted through Starboard. The NRA-ILA also supported two of these candidates—Gardner and Tillis—with independent expenditures contracted through Starboard. At or around the same time, these same three candidates were contracting with OnMessage for advertising and media consulting.[36]

a) North Carolina U.S. Senate Candidate Thom Tillis:

i. The NRA-PVF paid $2.3 million to Starboard for independent expenditures supporting Tillis or opposing his opponent,[37] and the NRA-ILA paid Starboard $812,658 for Tillis independent expenditures.[38]

ii. Tillis's authorized campaign committee, the Thom Tillis Committee, reported paying OnMessage $6.6 million during the same cycle for "advertising" and "media consulting."[39]

iii. The Thom Tillis Committee reported disbursements to OnMessage at the address 705 Melvin Ave. #105 in Annapolis, Maryland.[40] The NRA-PVF

---

36 *Our Clients*, ONMESSAGE, INC., https://onmessageinc.com/our-clients/ (last visited Oct. 19, 2018). In addition to these three senatorial candidates, Florida gubernatorial candidate Rick Scott also hired OnMessage in 2014 and there is evidence that Starboard was simultaneously producing advertisements supporting Scott on behalf of the NRA (although Florida law does not require groups making independent expenditures to disclose whom they are supporting). *See* Spies, *supra* note 5.

37 National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. in support of Thom Tillis or opposing Kay Hagan (regularly scheduled reports), 2013-14, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&is_notice=false&payee_name=starboard&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

38 National Rifle Association of America Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. in support of Thom Tillis or opposing Kay Hagan (regularly scheduled reports), 2013-14, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C90013301&is_notice=false&candidate_id=S4NC00162&candidate_id=S8NC00239&payee_name=starboard&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

39 Thom Tillis Committee, Disbursements to OnMessage, Inc., 2013-14, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2014&data_type=processed&committee_id=C00545772&recipient_name=onmessage&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

40 *See, e.g.*, Thom Tillis Committee, Report of Receipts and Disbursements, April 15 Quarterly Report, FEC Form 3, at 452 (filed Apr. 15, 2014) http://docquery.fec.gov/pdf/893/14020293893/14020293893.pdf.

also reported disbursements to Starboard at this address in its reports in the 2014 cycle, including for its independent expenditures supporting Tillis.[41]

iv. OnMessage Founding Partner and Starboard Director Bradley Todd was described in news reports as a Tillis campaign "media strategist."[42]

b) Arkansas U.S. Senate Candidate Tom Cotton:

i. The NRA-PVF paid $1.6 million to Starboard for independent expenditures supporting Cotton or opposing his opponent.[43] The NRA-ILA did not pay Starboard for any independent expenditures in this race.

ii. Cotton's authorized campaign committee, Cotton for Senate, reported paying OnMessage $5.3 million during the same cycle for "Placed Media & Production," "Polling Consulting," and related services.[44]

iii. Cotton for Senate reported disbursements to OnMessage at its Annapolis, Maryland address.[45] The NRA-PVF also reported disbursements to Starboard at this address on its reports in the 2014 cycle, including for its independent expenditures supporting Cotton.[46]

---

41 *See* sources cited ¶18.

42 David Catanese, *It's Tillis v. Hagan in North Carolina*, U.S. NEWS & WORLD REPORT (May 6, 2014), https://www.usnews.com/news/articles/2014/05/06/thom-tillis-advances-faces-kay-hagan-in-north-carolina-senate-race.

43 National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. in support of Tom Cotton or opposing Mark Pryor (regularly scheduled reports), 2013-14, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&is_notice=false&candidate_id=S0AR00028&candidate_id=S4AR00103&payee_name=starboard&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

44 Cotton for Senate, Disbursements to OnMessage, Inc., 2013-14, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2014&data_type=processed&committee_id=C00499988&recipient_name=onmessage&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

45 *See, e.g.*, Cotton for Senate, October 2014 Quarterly Report, FEC Form 3, at 1947 (Oct. 15, 2014) http://docquery.fec.gov/cgi-bin/fecimg/?14020824088.

46 *See* sources cited ¶18.

iv. OnMessage's/Starboard's Todd was described in news reports as an "ad consultant" for Cotton's campaign.[47]

c) Colorado U.S. Senate Candidate Cory Gardner:

i. The NRA-PVF paid $2.6 million to Starboard for independent expenditures supporting Gardner or opposing his opponent.[48] The NRA-ILA paid $529,186 to Starboard for Gardner independent expenditures.[49]

ii. Gardner's authorized campaign committee, Cory Gardner for Senate, reported paying OnMessage $8.0 million during the same cycle for "media production," "web services," and similar services.[50]

iii. Cory Gardner for Senate reported disbursements to OnMessage at its Alexandria, Virginia offices.[51] The NRA-ILA also reported disbursements to Starboard at this address on its reports in the 2014 cycle, including for its independent expenditures supporting Gardner.[52]

---

47 Andrea Drusch, *Inside Ad-Makers' Outrageous Arkansas Senate Strategy*, THE ATLANTIC (Sept. 23, 2014), https://www.theatlantic.com/politics/archive/2014/09/inside-ad-makers-outrageous-arkansas-senate-strategy/435168/.

48 National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. in support of Cory Gardner or opposing Mark Udall (regularly scheduled reports), 2013-14, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&is_notice=false&candidate_id=S4CO00395&candidate_id=S8NM00184&payee_name=starboard&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

49 National Rifle Association of America Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. in support of Cory Gardner or opposing Mark Udall (regularly scheduled reports), 2013-14, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C90013301&is_notice=false&candidate_id=S4CO00395&candidate_id=S8CO00172&payee_name=starboard&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

50 Cory Gardner for Senate, Disbursements to OnMessage, Inc., 2013-14, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2016&data_type=processed&committee_id=C00492454&recipient_name=onmessage&min_date=01%2F01%2F2015&max_date=12%2F31%2F2016.

51 *See, e.g.*, Cory Gardner for Senate, 2014 Pre-General Report, FEC Form 3, at 556, (Oct. 23, 2014) http://docquery.fec.gov/cgi-bin/fecimg/?14021141823. The committee reported paying OnMessage at 815 Slaters Lane, the address on its corporate documents, *see, e.g.*, *OnMessage, Inc.*, Commonwealth of Virginia State Corporation Commission, *supra* note 9, rather than 817 Slaters Lane, the address listed on its website, onmessageinc.com.

52 *See* sources cited ¶19.

iv. OnMessage's/Starboard's Todd was described in news reports as a "consultant" for the Gardner campaign for OnMessage.[53]

21. In the 2016 cycle, the NRA-PVF and the NRA-ILA together paid Starboard a total of approximately $40.7 million: the NRA-PVF paid Starboard $17.0 million for independent expenditures[54] and $305,483 in other disbursements,[55] and the NRA-ILA paid Starboard $23.4 million for independent expenditures.[56] Together, the NRA-PVF and the NRA-ILA spent about $52.6 million on independent expenditures for the 2016 federal election;[57] the payments to Starboard represented a majority of that spending.

22. The NRA-PVF reported paying Starboard for expenses related to television, radio, and digital advertising in the 2016 cycle. As was the case in the previous cycle, the address reported on each NRA-PVF disbursement to Starboard[58] was the same address and suite number as OnMessage's Maryland office.[59]

---

[53] Alexis Levinson, *Democrats Try to Turn Cory Gardner into Todd Akin (Video)*, ROLL CALL (July 15, 2014), https://www.rollcall.com/news/hobby-lobby-mark-udall-cory-gardner-2014; Emily Schultheis, *Republicans Will Need to Sweep to Hold Onto Senate Majority in 2016*, THE ATLANTIC (Sept. 16, 2014), https://www.theatlantic.com/politics/archive/2014/09/republicans-will-need-to-sweep-to-hold-onto-senate-majority-in-2016/457608/.

[54] National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. (regularly scheduled reports), 2015-16, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&is_notice=false&payee_name=starboard&min_date=01%2F01%2F2015&max_date=12%2F31%2F2016.

[55] National Rifle Association of America Political Victory Fund, Disbursements to Starboard Strategic, Inc., 2015-16, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2016&data_type=processed&committee_id=C00053553&recipient_name=onmessage&recipient_name=starboard&min_date=01%2F01%2F2015&max_date=12%2F31%2F2016.

[56] National Rifle Association Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. (regularly scheduled reports), 2015-16, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C70000716&committee_id=C90013301&is_notice=false&payee_name=starboard&min_date=01%2F01%2F2015&max_date=12%2F31%2F2016.

[57] National Rifle Association of America Political Victory Fund, Financial Summary, 2015-16, https://www.fec.gov/data/committee/C00053553/?cycle=2016; National Rifle Association Institute for Legislative Action, Financial Summary, 2015-16, https://www.fec.gov/data/committee/C90013301/?cycle=2016.

[58] *See, e.g.*, National Rifle Association of America Political Victory Fund, Itemized Independent Expenditures, 30-Day Post-Election Report, 2016 General Election, FEC Form 3X, at 520 (amended May 4, 2017), http://docquery.fec.gov/cgi-bin/fecimg/?201705049053504739.

[59] ONMESSAGE, INC., https://onmessageinc.com/ (last visited June 15, 2018).

23. The NRA-ILA reported paying Starboard for "Advertising Expenses" in the 2016 cycle. As was the case in the previous cycle, the address reported on each NRA-ILA disbursement to Starboard[60] was the same address as OnMessage's Virginia office.[61]

24. The NRA-PVF and the NRA-ILA paid Starboard for independent expenditures supporting Wisconsin U.S. Senate candidate Ron Johnson, and Johnson's authorized campaign committee also contracted with OnMessage for media expenditures.

a) In the 2016 election cycle, the NRA-PVF paid $315,066 to Starboard for independent expenditures supporting Johnson or opposing his opponent.[62] The NRA-ILA paid $48,537 to Starboard for Johnson independent expenditures.[63]

b) Johnson's authorized campaign committee, Ron Johnson for Senate, Inc., reported paying OnMessage $3.8 million during the same cycle for "placed media," "strategy consulting," and other services.[64]

c) Ron Johnson for Senate Inc. reported disbursements to OnMessage at its Annapolis, Maryland offices.[65] The NRA-PVF also reported disbursements to

---

60 *See, e.g.*, National Rifle Association Institute for Legislative Action, Itemized Independent Expenditures, January 31 Year-End Report, 2016, at 90, http://docquery.fec.gov/cgi-bin/fecimg/?201701309041564790.

61 ONMESSAGE, INC., https://onmessageinc.com/ (last visited June 15, 2018).

62 National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. in support of Ron Johnson or opposing Russ Feingold (regularly scheduled reports), 2015-16, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&is_notice=false&candidate_id=S0WI00197&candidate_id=S8WI00026&payee_name=starboard&min_date=01%2F01%2F2015&max_date=12%2F31%2F2016.

63 National Rifle Association of America Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. in support of Ron Johnson or opposing Russ Feingold (regularly scheduled reports), 2015-16, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C90013301&is_notice=false&candidate_id=S0WI00197&candidate_id=S8WI00026&payee_name=starboard&min_date=01%2F01%2F2015&max_date=12%2F31%2F2016.

64 Ron Johnson for Senate Inc., Disbursements to OnMessage Inc., 2015-16, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2016&data_type=processed&committee_id=C00482984&recipient_name=onmessage&min_date=01%2F01%2F2015&max_date=12%2F31%2F2016.

65 *See, e.g.*, Ron Johnson for Senate, Inc., October 2015 Quarterly Report, FEC Form 3, at 2663 (amended) (Jan. 13, 2017) http://docquery.fec.gov/cgi-bin/fecimg/?201701190200016744.

Starboard at this address on its reports in the 2016 cycle, including for its independent expenditures supporting Johnson.[66]

d) Bradley Todd was a consultant for Johnson's campaign who worked on "media and polling" through August 2016.[67]

25. Neither the NRA-ILA nor NRA-PVF reported any disbursements to OnMessage in federal races for the 2016 election cycle.[68] However, despite this, OnMessage was nominated for, and won, industry awards for NRA-ILA and NRA-PVF ads that had been contracted through Starboard.

26. Specifically, on January 20, 2017, OnMessage Founding Partner Bradley Todd announced that OnMessage was a finalist for Reed Awards for two ads paid for by the NRA-ILA and NRA-PVF opposing presidential candidate Hillary Clinton titled "Nightstand" and "Jet."[69] Todd declared that "OnMessage Inc was proud to partner with the NRA and produce their ads in this election."[70] Both "Nightstand"[71] and "Jet"[72] are prominently featured on

---

66 *See* sources cited ¶22.

67 *See, e.g.*, WisPolitics, *Johnson Downplays Consultant's Departure* (Aug. 18, 2016), http://elections.wispolitics.com/2016/08/jonson-downplays-consultants-departure.html; Bill Glauber, *Strategic Change Pays Off for Johnson*, MILWAUKEE JOURNAL SENTINEL (Nov. 9, 2016), https://www.jsonline.com/story/news/politics/elections/2016/11/09/johnson-lays-out-100-day-goals-gop/93538466/.

68 However, the NRA may have continued to contract with OnMessage to produce advertisements for non-federal races. In 2016, OnMessage also won a Reed Award for its 2015 ad produced for the NRA-ILA, "Tradition," which supported a Texas ballot initiative. *2016 Reed Award Winners*, Campaigns & Elections (Feb. 19, 2016), https://www.campaignsandelections.com/campaign-insider/2016-reed-award-winners (last visited June 15, 2018).

69 Brad Todd, *Two NRA Presidential Ads in Running for Top Reed Award*, ONMESSAGE, INC. (Jan. 20, 2017), https://onmessageinc.com/blog/012017/ (last visited July 16, 2018). The NRA-PVF paid Starboard $3,344,906 for independent expenditures opposing Clinton in the 2016 cycle. National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. opposing candidate Hillary Clinton, https://bit.ly/2md0ynG. The NRA-ILA paid Starboard $341,724 for independent expenditures opposing Clinton in the 2016 cycle. National Rifle Association of America Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. opposing candidate Hillary Clinton, https://bit.ly/2uotuNg. Neither the NRA-PVF nor the NRA-ILA reported any disbursements to OnMessage in the 2016 cycle.

70 *Id.*

71 *Our Work: Nightstand*, ONMESSAGE, INC., https://onmessageinc.com/our-work/nightstand/ (last visited July 16, 2018). The disclaimer at the end of "Nightstand" states it was paid for by the NRA-ILA.

72 *Our Work: Jet*, ONMESSAGE, INC., https://onmessageinc.com/our-work/jet/ (last visited July 16, 2018). The disclaimer at the end of "Jet" states it was paid for by the NRA-ILA; however, a version of the ad released on

OnMessage's website as "featured" examples of "our work." On February 20, 2017, Todd announced on OnMessage's blog that "Nightstand" had won the Reed Award for Best Ad for an Independent Expenditure Campaign (Presidential).[73] In the blog, Todd credited OnMessage for having "brought home" this award.[74]

27. On March 30, 2017, OnMessage Partner Orrin "Guy" Harrison posted on the company's blog that OnMessage had won five awards at the American Association of Political Consultants Awards Conference, noting "[w]e're especially proud that our work on the National Rifle Association's efforts to elect President Trump received the highest honor in both TV and digital categories."[75] The blog noted that OnMessage won Best Presidential Independent Expenditure Digital Campaign for its work on the NRA's independent expenditures campaign "Donald Trump for President."[76] It won Best Ad for Presidential Independent Expenditure Campaign for producing the NRA-ILA's ad "Nightstand."[77] And it won a Bronze award for Best Ad for U.S. Senate Independent Expenditure for the NRA-ILA's ad "The Chair," attacking Indiana U.S. Senate candidate Evan Bayh.[78]

August 9, 2016 stated it was paid for by NRA-PVF. *See* Eliza Collins, *NRA launches $3 million anti-Clinton ad buy*, USA TODAY (Aug. 9, 2016), https://www.usatoday.com/story/news/politics/onpolitics/2016/08/09/nra-ad-hillary-clinton-trump/88489624/.

[73] Brad Todd, *OnMessage Wins Four Reed Awards*, ONMESSAGE, INC. (Feb. 20, 2017), https://onmessageinc.com/blog/02202017/ (last visited July 16, 2018).

[74] *Id.*

[75] Guy Harrison, *OnMessage Wins Five Pollie Awards for TV and Digital Work*, ONMESSAGE, INC. (Mar. 20, 2017), https://onmessageinc.com/blog/03202017/ (last visited July 16, 2018).

[76] *Id.*

[77] *Id.*

[78] *Id.* "The Chair" was paid for by the NRA-ILA and was released in late October. Theodore Schleifer, *NRA calls for check on Hillary Clinton by defeating Evan Bayh*, CNN (Oct. 25, 2016), https://www.cnn.com/2016/10/25/politics/nra-checks-and-balances-evan-bayh-hillary-clinton/index.html. In October, the NRA-ILA reported paying $895,533 to Starboard for television advertising costs related to independent expenditures opposing Hillary Clinton. National Rifle Association Institute for Legislative Action, Itemized Independent Expenditures, January 31 Year-End Report, 77, 85, http://docquery.fec.gov/pdf/701/201701309041564701/201701309041564701.pdf#navpanes=0. The NRA-ILA did not report any payments to OnMessage.

28. So far in the 2018 election cycle, the NRA-PVF has reported $2.4 million in disbursements to Starboard.[79] This cycle, the NRA-PVF has also reported paying Starboard $3.8 million for independent expenditures in the Alabama, Montana, and Georgia special elections, and in the Missouri, Indiana, Tennessee, and Montana U.S. Senate races.[80]

29. Starboard's website (starboardstrategicinc.com) currently includes a generic email address (info@starboardstrategicinc.com) and provides neither a list of staff nor a portfolio of work.[81] Several of the site's links are broken. According to *POLITICO,* OnMessage director Wesley Anderson registered Starboard's website, and the mailing address for the "admin contact" and the "tech contact" on Starboard's website registration begins "OnMessage Inc. ATTN STARBOARDSTRATEGIC.COM."[82]

30. There are many similarities in the language used on Starboard's and OnMessage's websites. For example, Starboard's "Creative" page reads, "**In today's fragmented media age, advertisers must entertain or lose.** Superior marketing carries the day and **we strive to make our ads watchable** and memorable. It's a tough battle, but **we've got a team with the talent and the determination** to win the fight."[83] OnMessage's webpage describing its creative services reads "**In today's fragmented media age, advertisers must entertain or**

---

[79] National Rifle Association of America Political Victory Fund, Disbursements to Starboard Strategic, Inc., 2017-18, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2018&data_type=processed&committee_id=C00053553&recipient_name=onmessage&recipient_name=starboard&min_date=01%2F01%2F2017&max_date=05%2F10%2F2018 (last visited Oct. 21, 2018).

[80] National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. (24- and 48-hour reports), 2017-18, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&is_notice=true&payee_name=onmessage&payee_name=starboard&min_date=01%2F01%2F2017&max_date=12%2F31%2F2018 (last visited Oct. 21, 2018).

[81] STARBOARD STRATEGIC, INC., https://starboardstrategicinc.com/ (last visited Sept. 13, 2018).

[82] Spies, *supra* note 5; *see also* Starboard Strategic Inc. website registration certificate, *available at* https://www.documentcloud.org/documents/4519937-Starboardregistration.html#document/p1/a437455 (last visited July 16, 2018).

[83] *Creative*, STARBOARD STRATEGIC, INC., https://starboardstrategicinc.com/creative/ (last visited Sept. 13, 2018) (emphasis added).

lose. The only thing voters hate more than politics is political advertising and **we strive to make our ads watchable** to even the most jaded voter. It's a steep climb up a rugged path, and **we've got a team with the talent and the determination** to blaze any trail."[84]

31. On July 13, 2018, *POLITICO* reported:

> Despite Starboard's impressive run in 2014, there appeared to be no attempt to market the new company to other prospective clients. In fact, according to FEC reports, other than a small sum it received from the National Republican Congressional Committee—business worth less than $20,000—it has never had another federal election client besides the NRA. Moreover, none of Starboard's partners has publicly affiliated himself with the company; four of them have LinkedIn pages, for instance, and their profiles only mention OnMessage. One of them is Todd, who used the email address brad@starboardstrategicinc.com to offer the former OnMessage employee a job.
>
> There is also no indication that Starboard has a distinct team of employees working within the offices of OnMessage. As with the partners, there are no staff members who publicly list themselves as working for Starboard, though a second email shows acknowledgment of double duty. Vicki Tomchik is OnMessage's longtime chief financial officer; the job is the only one she lists on her LinkedIn page. But in 2014, when the former OnMessage employee received an email from Tomchik, there were two references below her signature. One was OnMessage, and the other was Starboard. (Tomchik did not respond to a request for comment.)[85]

32. *POLTICO* also reported that:

> A former OnMessage employee who worked out of the Alexandria location in 2014 says Starboard had no separate dedicated presence there. "Beyond some Starboard-labeled thumb-drives lying around, I don't recall anything within our office that was called or associated with Starboard," said the former employee who requested anonymity to avoid retribution.[86]

33. Finally, *POLITICO* reported that Starboard's/OnMessage's Todd is close friends with Chris Cox, the executive director of the NRA-ILA (and chairman of the NRA-PVF).[87] NRA

---

84 *Our Story*, ONMESSAGE, INC., https://onmessageinc.com/our-story/ (last visited Sept. 13, 2018) (emphasis added).

85 Spies, *supra* note 5.

86 *Id.*

87 *Id.*

employees reported seeing Todd around their office, and one employee noted "[t]here was consulting with [Todd] over high-end issues that were deemed controversial."[88]

34. On August 3, 2017, *McClatchy* reported that "OnMessage's Brad Todd, a consultant for Hawley's [2016] attorney general campaign, also will be Hawley's consultant for any Senate run."[89] McClatchy also reported that "[n]inety percent of the $8.7 million Hawley's state campaign committee spent before Election Day last year went to OnMessage Inc. for advertising and research."[90] Todd has continued to speak on behalf of Josh Hawley for Congress throughout the general election campaign.[91]

35. On September 25, 2018, the NRA tweeted that the NRA-PVF was endorsing Hawley in his senatorial bid.[92] The tweet also linked to a longer press release on the NRA-ILA's website announcing the endorsement and quoting NRA-PVF chairman Chris Cox, who said, "The NRA encourages all members, gun owners, and sportsmen in Missouri to vote Josh Hawley for U.S. Senate in November."[93]

36. So far in the 2018 election cycle—specifically, on October 5, 2018 and October 19, 2018—the NRA-PVF has reported $973,411 in payments to Starboard for independent expenditures either supporting Hawley or opposing Claire McCaskill.[94] The NRA-PVF reported paying

---

88 *Id.*

89 Lindsay Wise & Ben Wieder, *Hawley signals a Senate run and Democrats quickly cry foul*, MCCLATCHY (Aug. 3, 2017), https://www.mcclatchydc.com/news/politics-government/article165290077.html

90 *Id.*

91 *See, e.g.*, Tarini Parti & Henry Gomez, *Expanding Front in the Republicans' Culture Wars: The NFL* Buzzfeed News (Sept. 5, 2018), https://www.buzzfeednews.com/article/tariniparti/nfl-protests-football-republicans-midterm-elections.

92 NRA, *@NRAPVF endorsed @HawleyMO for U.S. Senate in #Missouri*, TWITTER (Sept. 25, 2018), https://twitter.com/NRA/status/1044700644442079232.

93 Press Release, NRA-ILA, NRA Endorses Hawley for U.S. Senate in Missouri (Sept. 25, 2018), https://www.nraila.org/articles/20180925/nra-endorses-hawley-for-us-senate-in-missouri.

94 National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. in support of Josh Hawley or opposing Claire McCaskill (24- and 48-hour reports), 2017-18, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00053553&is_notice=true&payee_name=starboard&min_date

Starboard at the address 705 Melvin Ave., #105, Annapolis, Maryland, 21401,[95] the same address and suite number as OnMessage's Maryland office.[96]

37. Also on October 5, 2018, the date of the NRA-PVF's first report of independent expenditures to Starboard in the 2018 Missouri U.S. Senate race, the NRA's lobbying arm, the NRA-ILA, issued a press release announcing the start of a seven-figure ad campaign in the Missouri U.S. Senate race by the NRA-PVF.[97] The press release included a quote from Cox, who said, "If you value your constitutional right to self-defense, vote Josh Hawley for U.S. Senate,"[98] and a link to the ad itself.[99]

38. As of September 30, 2018, the close of books for the 2018 October quarterly report, Josh Hawley for Senate had reported paying $2.2 million to OnMessage for purposes including "media production," "web ads," "political strategy consulting/travel," and "survey research,"[100] at the address 705 Melvin Ave., #105, Annapolis, Maryland, 21401.[101]

=01%2F01%2F2017&max_date=12%2F31%2F2018 (last visited Oct. 21, 2018). The payments to Starboard were described as "Media Buy- Broadcast/Cable, Radio, Digital," "Media Buy- Broadcast/Cable," "Media Placement-Digital," and "Media Placement- Cable." *See* National Rifle Association of America Political Victory Fund, 24/48 Hour Report of Independent Expenditures, FEC Schedule E, at 2-3 (filed Oct. 5, 2018), http://docquery.fec.gov/pdf/598/201810059124378598/201810059124378598.pdf; National Rifle Association of America Political Victory Fund, 24/48 Hour Report of Independent Expenditures, FEC Schedule E, at 1-2 (filed Oct. 19, 2018), http://docquery.fec.gov/pdf/605/201810199125764605/201810199125764605.pdf.

[95] *See, e.g.*, National Rifle Association of America Political Victory Fund, 24/48 Hour Report of Independent Expenditures, FEC Schedule E, at 2-3 (filed Oct. 5, 2018), http://docquery.fec.gov/pdf/598/201810059124378598/201810059124378598.pdf.

[96] ONMESSAGE, INC., https://onmessageinc.com/ (last visited Oct. 19, 2018).

[97] Press Release, NRA-ILA, NRA Launches Seven-Figure Campaign in Missouri (Oct. 5, 2018), https://www.nraila.org/articles/20181005/nra-launches-seven-figure-campaign-in-missouri.

[98] *Id.*

[99] *See* NRA, *Josh Hawley will defend our rights. Always*, YOUTUBE (Oct. 5, 2018), https://www.youtube.com/watch?v=m2nC6ICopmk&feature=youtu.be.

[100] *See* Josh Hawley for Senate, Disbursements to OnMessage, 2017-18, FEC.GOV, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2018&data_type=processed&committee_id=C00652727&recipient_name=on+message&recipient_name=onmessage&min_date=01%2F01%2F2017&max_date=10%2F05%2F2018 (last visited Oct. 9, 2018); Josh Hawley for Senate, 2018 October Quarterly Report, FEC Form 3, at 1308-1313 (filed Oct. 15, 2018), http://docquery.fec.gov/pdf/990/201810159124925990/201810159124925990.pdf.

[101] *See, e.g.*, Josh Hawley for Senate, 2018 Pre-Primary Report, FEC Form 3, at 102, http://docquery.fec.gov/cgi-bin/fecimg/?201807270200663877.

39. Additionally, as of September 30, 2018, Josh Hawley for Senate reported paying $98,967 to an entity called "First Tuesday" for "Communications Consulting," "Communications Consulting/Travel," or "Travel,"[102] at the same address as OnMessage, 705 Melvin Ave., #105, Annapolis, Maryland, 21404.[103] Maryland corporate records do not show any results for registered corporations under the name "First Tuesday," but Virginia State Corporation Commission records show that an entity called "First Tuesday: The Ballot Initiative Group" is located at 817 Slaters Lane, Alexandria Virginia,[104] the same address as OnMessage's Virginia office. Its articles of incorporation, dated August 2, 2016, listed the following individuals as directors: Bradley A Todd, Gail Gitcho, Wesley Anderson, Curtis Anderson, and Graham Shafer.[105] Its 2017 annual report, dated May 8, 2018, continued to list Todd, Gitcho, and Shafer, as directors, but replaced Wesley and Curtis Anderson with Orrin Harrison and Timothy Teepell.[106] Todd, Shafer, Teepell, Harrison, and Wesley and Curtis Anderson all serve on Starboard's and OnMessage's boards, and First Tuesday's agent, Craig Palik, is also the registered agent for Starboard and OnMessage.[107]

Red Eagle Media, NMRPP and AMAG

---

102 *See* Josh Hawley for Senate, Disbursements to First Tuesday, 2017-18, FEC.gov, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2018&data_type=processed&committee_id=C00652727&recipient_name=first+tuesday&min_date=01%2F01%2F2017&max_date=10%2F05%2F2018 (last visited Oct. 9, 2018); Josh Hawley for Senate, 2018 October Quarterly Report, FEC Form 3, at 1300 (filed Oct. 15, 2018), http://docquery.fec.gov/pdf/990/201810159124925990/201810159124925990.pdf.

103 *See, e.g.*, Josh Hawley for Senate, 2018 Pre-Primary Report, FEC Form 3, at 98 (filed July 23, 2018), http://docquery.fec.gov/cgi-bin/fecimg/?201807270200663873.

104 *See First Tuesday: The Ballot Initiative Group, Inc.*, Commonwealth of Virginia State Corporation Commission, https://sccefile.scc.virginia.gov/Business/0807948 (last visited Oct. 9, 2018).

105 *Articles of Incorporation of First Tuesday: The Ballot Initiative Group, Inc.*, Commonwealth of Virginia State Corporation Commission (filed Aug. 2, 2016), https://sccefile.scc.virginia.gov/Documents/1608026267.pdf?DocumentName=1608026267.

106 *2017 Annual Report; First Tuesday: The Ballot Initiative Group, Inc.*, Commonwealth of Virginia State Corporation Commission (filed May 8, 2018), https://sccefile.scc.virginia.gov/08079485/AnnualReport/217549752.pdf.

107 *See* ¶15.

40. According to Federal Communications Commission ("FCC") records, the NRA-PVF placed its Missouri broadcast independent expenditures supporting Hawley using Red Eagle Media, located at 815 Slaters Avenue, Alexandria, Virginia, 22314.[108] The FCC database does not appear to show the NRA-PVF placing 2018 broadcast advertisements in Missouri with any agency other than Red Eagle Media.

41. Red Eagle Media does not appear to have a website. Reports filed with the Commission do not show any record of the NRA-PVF or the NRA-ILA reporting disbursements to Red Eagle, either via regular disbursements or via independent expenditures.[109]

42. According to Virginia Corporation Commission records, "Red Eagle Media" is a "fictitious name" or a "trade name" associated with the firm "National Media Research Planning and Placement, LLC," located at 815 Slaters Lane, Alexandria VA.[110] According to the Commonwealth of Virginia State Corporation Commission:

> A fictitious name is a name that a person (individual or business entity) uses instead of the person's true name, usually in the course of transacting or offering to transact business. It is sometimes referred to as an "assumed name" or "trade name," and it is

---

[108] *See, e.g.*, Exhibit G at 1-3 (showing a contract between Red Eagle Media and the Missouri station KOAM for "MO Senate" ads sponsored by the NRA-PVF, slated to run throughout the first three weeks of October 2018 and valued at $100,880).

[109] A handful of other outside groups and super PACs—namely, America First Action, America First Policies, With Honor Fund, Inc., and New Republican PAC—have reported to the FEC paying Red Eagle for independent expenditures in 2018, and the NRCC reported paying Red Eagle in 2017. *See* Independent Expenditures to Red Eagle Media Group (24- and 48-Hour Reports), 2017-18, FEC.GOV, https://www.fec.gov/data/independent-expenditures/?data_type=processed&is_notice=true&payee_name=red+eagle&min_date=01%2F01%2F2017&max_date=12%2F31%2F2018 (last visited Oct. 10, 2018).

[110] A business entity search for "Red Eagle Media" on the Virginia Corporation Commission website produces a list of results that includes "Red Eagle Media Group (Alexandria CI)," with an SCC ID number of S2070524, and a status of "fictitious name." Business Entity Search for "Red Eagle Media," Commonwealth of Virginia State Corporation Commission, https://sccefile.scc.virginia.gov/Find/Business?SearchTerm=red+eagle+media&SearchPattern=K&as_fid=71a314ab0f8a83563c7a4633b7f34602942d6fb4 (last visited Oct. 9, 2018). Clicking on that search result leads to the page for National Media Research Planning and Placement, LLC, and the same SCC ID number, S2070524. *National Media Research Planning and Placement, LLC*, Commonwealth of Virginia State Corporation Commission, https://sccefile.scc.virginia.gov/Business/S207052 (last visited Oct. 9, 2018).

often identified after a person's true name with the abbreviation "t/a" ("trading as"), "dba" ("doing business as"), or "aka" ("also known as").[111]

43. National Media Research, Planning & Placement (generally referred to as "National Media"[112]) describes itself as "a nationally recognized leader in media research, planning, and placement for issue advocacy, corporate, and political campaigns," and its website lists examples of its work, the names of and titles of approximately 20 employees, and a contact address of 817 Slaters Lane, Alexandria, VA, 22314.[113]

44. FCC documents filed on behalf of the NRA-PVF by Red Eagle are signed by National Media employees.[114] For example:

a) An "agreement form" between Red Eagle and the Missouri station KYTV for NRA-PVF ads pertaining to the "Missouri General Election U.S. Senate," was signed on September 6, 2018 by Jon Ferrell,[115] who according to the National Media website is National Media's "Director of Accounting,"[116] and who has been described in news reports as "National Media chief financial officer."[117]

---

111 *Frequently Asked Questions: Fictitious Names*, Commonwealth of Virginia State Corporation Commission, http://www.scc.virginia.gov/clk/befaq/fict.aspx (last visited Oct. 9, 2018).

112 *See, e.g.*, Betsy Woodruff, *Trump's Already Part of the D.C. Swamp, Whether He Knows It or Not*, DAILY BEAST (Oct. 26, 2016), https://www.thedailybeast.com/trumps-already-part-of-the-dc-swamp-whether-he-knows-it-or-not?ref=scroll.

113 NATIONAL MEDIA, www.natmedia.com (last visited Oct. 9, 2018).

114 FCC filings filed on behalf of other political committees or entities also show NMRPP employees listed as Red Eagle contacts. For example, an America First Action political file disclosure form dated October 3, 2018 lists Michael Eyerman as Red Eagle's contact person, Exhibit H at 1, and a With Honor Fund political file disclosure form dated April 19, 2018 lists Melissa Sharp as Red Eagle's contact, Exhibit I at 1. Both Eyerman and Sharp appear as employees on NMRPP's website. NATIONAL MEDIA, www.natmedia.com (last visited Oct. 9, 2018).

115 *See, e.g.*, Exhibit J at 3.

116 NATIONAL MEDIA, www.natmedia.com (last visited Oct. 9, 2018).

117 Evan Morris, *FBI Searches for Possible Accomplices in Probe of Fallen K Street Lobbyist*, WALL ST. J. (Feb. 16, 2017), https://www.wsj.com/articles/fbi-searches-for-possible-accomplices-in-probe-of-fallen-k-street-lobbyist-1487285904.

Ferrell's LinkedIn page describes his position as "CFO at National Media Inc.," and does not mention Red Eagle.[118]

b) A September 19, 2018 "political file disclosure form" filed by Red Eagle with the Missouri station KSHB, for NRA-PVF ads referencing Hawley and his opponent, lists Kristy Kovatch as the "contact person" for Red Eagle.[119] On National Media's website, Kristy M. Kovatch is listed as a "senior media buyer" who "specializes in television media buying for political candidates" and has been with the company for 20 years.[120] Kovatch's LinkedIn page lists her as "Senior Media Buyer at National Media, Research, Planning & Placement," and does not mention Red Eagle.[121]

45. As of September 30, 2018, Josh Hawley for Senate had reported $45,000 in payments to "National Media Digital" for "digital consulting"[122] at the address 815 Slaters Lane, Alexandria, VA, 22314.[123] National Media's website highlights its digital work as one of the services it offers.[124]

46. Additionally, records filed with the Commission and FCC show that Josh Hawley for Senate has made disbursements to, or otherwise contracted with, a firm called "American Media &

---

118 *Jon Ferrell*, LinkedIn, https://www.linkedin.com/in/jon-ferrell-b102967 (last visited Oct. 10, 2018) (listing Ferrell as "CFO at National Media Inc").

119 Exhibit K at 1.

120 NATIONAL MEDIA, www.natmedia.com (last visited Oct. 9, 2018).

121 *Kristy (Moran) Kovatch*, LinkedIn, https://www.linkedin.com/in/kristy-moran-kovatch-838ba3/ (last visited Oct. 9, 2018).

122 Josh Hawley for Senate, Disbursements to National Media, FEC.gov, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2018&data_type=processed&committee_id=C00652727&recipient_name=national+media&min_date=01%2F01%2F2017&max_date=10%2F05%2F2018 (last visited Oct. 9, 2018). Josh Hawley for Senate did not report any additional payments to National Media on its October quarterly report.

123 *See, e.g.*, Josh Hawley for Senate, 2018 Pre-Primary Report, FEC Form 3, at 101 (filed July 23, 2018), http://docquery.fec.gov/cgi-bin/fecimg/?201807270200663876.

124 NATIONAL MEDIA, www.natmedia.com (last visited Oct. 9, 2018).

Advocacy Group" ("AMAG") at that same 815 Slaters Lane address;[125] in a 2016 *Daily Beast* article, a lawyer for National Media and AMAG "confirmed" that the two entities are "affiliated" but "didn't detail the nature of their relationship."[126] According to Virginia Corporation Commission records, "American Media & Advocacy Group, LLC" has a principal office at that 815 Slaters Lane address.[127]

47. FCC documents filed on behalf of Josh Hawley for Senate by AMAG are signed by National Media employees. For example:

a) An October 2018 contract shows AMAG placing $50,175 in Josh Hawley for Senate ads with KMOV, and lists John Jay as AMAG's contact person.[128] According to National Media's website, John Jay has been National Media's "Client Media Planner" since 2015.[129]

b) An undated document uploaded to the FCC database on July 5, 2018 shows AMAG submitting an agreement form on behalf of Josh Hawley for Senate, and signed by "Jon Ferrell, agent for Josh Hawley for Senate."[130] As noted supra ¶44,

---

125 Josh Hawley for Senate has reported paying $1,359 to AMAG at the 815 Slaters Lane address: $799 to AMAG for "web SVC" on May 30, 2018, Josh Hawley for Senate, 2018 July Quarterly Report, FEC Form 3, at 577 (filed July 11, 2018), http://docquery.fec.gov/cgi-bin/fecimg/?201807180200571988, and $560 for "web service" on August 22, 2018, Josh Hawley for Senate, 2018 October Quarterly Report, FEC Form 3, at 1270 (filed Oct. 15, 2018), http://docquery.fec.gov/pdf/990/201810159124925990/201810159124925990.pdf. FCC filings indicate that AMAG has placed tens of thousands of dollars of advertisements on behalf of Josh Hawley for Senate during the most recent reporting period. For example, one order dated August 15, 2018, shows AMAG (at the 815 Slaters Lane address) placing $84,290 in Josh Hawley for Senate ads on KCTV, slated to run October 23, 2018 through October 29, 2018. Exhibit L at 1, 5. This may suggest that, in addition to Josh Hawley for Senate contracting with AMAG directly, it is also used as a subcontractor by Hawley committee vendors.

126 Woodruff, *supra* note 112. Additionally, at least two Missouri FCC filings (for ads run by the super PAC America First Action) display "Red Eagle Media Group" as the agency on the contract, but then list "American Media and Advocacy Group" on the attached Agreement form (NAB Form PB-18), which are signed by National Media's Jon Ferrell. Exhibit M at 1, 10; Exhibit N at 1, 10.

127 *American Media & Advocacy Group, LLC*, Commonwealth of Virginia State Corporation Commission, https://sccefile.scc.virginia.gov/Business/S416256 (last visited Oct. 15, 2018).

128 Exhibit O at 1.

129 NATIONAL MEDIA, www.natmedia.com (last visited Oct. 9, 2018).

130 Exhibit P at 3. Ferrell also signed the second page of the agreement form. *Id.* at 2.

Ferrell is National Media's "Director of Accounting,"[131] and his LinkedIn profile describes him only as "CFO at National Media Inc."[132]

c) Similarly, on an agreement form filed by AMAG dated September 6, 2018 for a "coordinated buy" on behalf of "Josh Hawley for Senate/NRSC," Ferrell signed the second page of the agreement form and the attached "federal candidate certification," where he signed as "Jon Ferrell, agent for Josh Hawley for Senate."[133]

SUMMARY OF THE LAW

48. Federal law limits to $2,700 the amount of a contribution that a senatorial candidate or her authorized campaign committee may accept from an individual donor. 52 U.S.C § 30116(a)(1). FECA also prohibits a corporation or labor union from making a contribution to a federal candidate. 52 U.S.C. § 30118(a).

49. Generally, contributions from a person to political committees other than candidate and party committees may not exceed, in the aggregate, $5,000 per calendar year, 52 U.S.C. § 30116(a)(1)(C), and candidates cannot accept contributions from a non-multicandidate political committee in excess of $2,700, *id.* § 30116(a)(1).

50. A "contribution" includes "any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office." 52 U.S.C. § 30101(8)(A)(i); *see also* 11 C.F.R. §§ 100.52(a), 114.1(a)(1). "Anything of value" includes all in-kind contributions. 11 C.F.R. § 100.52(d)(1). An in-kind contribution includes the provision without charge (or at less than the usual and normal

---

131 NATIONAL MEDIA, www.natmedia.com (last visited Oct. 9, 2018).

132 *Jon Ferrell*, LinkedIn, https://www.linkedin.com/in/jon-ferrell-b102967 (last visited Oct. 10, 2018) (listing Ferrell as "CFO at National Media Inc").

133 Exhibit Q at 2-3.

charge) of any goods or services, including, but not limited to, "facilities, equipment, supplies, personnel, advertising services, membership lists, and mailing lists." *Id.*

51. An "expenditure" includes "any purchase, payment . . . or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office." 52 U.S.C. § 30101(9)(A).

52. Any expenditure made in coordination with a candidate—i.e., "in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized political committees, or their agents"—is an in-kind contribution to the candidate, 52 U.S.C. § 30116(a)(7)(B)(i); 11 C.F.R. § 109.20, and must be reported as a contribution to that candidate by the person that made the payment, 11 C.F.R. § 109.21(b).[134]

53. In enacting the Bipartisan Campaign Reform Act, Congress mandated that the Commission promulgate "regulations on coordinated communications" to address, among other things, "payments for the use of a common vendor" and "payments for communications made by a person after substantial discussion about the communication with a candidate," and that such regulations "shall not require agreement or formal collaboration to establish coordination."[135] Those "coordinated communications" regulations are at 11 C.F.R. § 109.21.

54. Under the regulations, a communication is coordinated with a candidate and/or that candidate's authorized committee, and is thus a contribution to that candidate's committee, when the communication (1) is paid for, in whole or in part, by a person other than the

---

[134] Contributions in the form of "coordinated communications" resulting from conduct described in 11 C.F.R. § 109.21(d)(4) ("common vendor") need not be reported as received by the campaign committee with which the communication is "coordinated," absent other conduct. *Id.* § 109.21(b)(2).

[135] *See* Pub. L. No. 107-155, sec. 214(c)(2), 116 Stat. 81, 94-95 (2002); *see also* note to 52 U.S.C. § 30116(a)(7).

candidate or committee; (2) satisfies at least one of the "content standards" in the regulation; and (3) satisfies at least one of the "conduct standards" in the regulation. *Id.* § 109.21(a).

55. The second prong, the "content standard," is met if the communication "expressly advocates . . . the election or defeat of a clearly identified candidate for Federal office." *Id.* § 109.21(c)(3).

56. The "conduct" standard is satisfied if the political committee paying for the communication (a) uses a commercial vendor[136] to create, produce, or distribute the communication[137] that (b) during the previous 120 days also provided certain services to the candidate identified in the communication or a political party committee,[138] such as development of media strategy and selection of advertising slots; selection of audiences; polling; developing the content of communications; voter identification; or otherwise providing political or media advice,[139] and (c) the vendor uses or conveys to the political committee information about the candidate's or party committee's "plans, projects, activities or needs" (or information used previously by the commercial vendor in providing services to the candidate) and "that information is material to the creation, production, or distribution of the communication."[140] 11 C.F.R. § 109.21(d)(4).[141]

---

136 The regulation cross-references the definition of "commercial vendor" at 11 C.F.R. § 116.1(c), which includes "any persons providing goods or services to a candidate or political committee whose usual and normal business involves the sale, rental, lease or provision of those goods or services." *Id.*

137 11 C.F.R. § 109.21(d)(4)(i).

138 *Id.* § 109.21(d)(4)(ii). For purposes of this analysis, the commercial vendor includes "any owner, officer, or employee of the commercial vendor." *Id.*

139 *Id.* § 109.21(d)(4)(ii)(A-I).

140 *Id.* § 109.21(d)(4)(iii).

141 These requirements are not satisfied if the material information was obtained from a publicly available source, 11 C.F.R. § 109.21(d)(5)(ii), or if the committee establishes and implements a firewall in a written policy that prohibits the flow of information about the candidate's campaign plans, projects, activities or needs to those responsible for the creation, production, or distribution of the communications, pursuant to 11 C.F.R. § 109.21(h). However, in promulgating the rules, the Commission emphasized that "the mere existence of a confidentiality agreement or ethical screen should provide a *de facto* bar to the enforcement of the limits on coordinated

57. The Commission has found reason to believe that FECA has been violated if the first two parts of the common vendor test are satisfied. In MUR 5546, for example, the Commission concluded that, "[b]ecause the first two parts of the common vendor test are met, there is reason to investigate whether the use or exchange of information occurred as described in 11 C.F.R. § 109.21(D)(4)(iii)." MUR 5546 (Progress for America Voter Fund), Notification with Factual and Legal Analysis at 9 (Jul. 5, 2005);[142] *see also* MUR 5502 (Martinez for Senate), Notification with Factual and Legal Analysis at 8 (May 18, 2005).[143] Additionally, in MURs 5403 and 5406, the Commission found reason to believe that the political committee America Coming Together had engaged in coordinated communications pursuant to the § 109.21(d)(4) shared vendor "conduct standard" by contracting with the commercial vendor Dewey Square Group to run a phone bank operation supporting John Kerry's presidential campaign, since that vendor had previously provided voter identification services to the Kerry campaign committee. *Id.*, Notification with Factual and Legal Analysis to America Coming Together at 9-13 (Oct. 20, 2004).[144] The fact that the vendor provided services to both the campaign and the political committee was sufficient to find reason to believe that FECA had been violated; the Commission then investigated whether the vendor used or conveyed to the political committee information about the candidates' plans, projects, activities, or needs. *Id.* at 12.

CAUSES OF ACTION

---

communication imposed by Congress. Without some mechanism to ensure enforcement, these private arrangements are unlikely to prevent the circumvention of the rules." 68 Fed. Reg. 421, 435 (Jan. 3, 2003).

142 *Available at* http://eqs.fec.gov/eqsdocsMUR/00005ABC.pdf.

143 *Available at* http://eqs.fec.gov/eqsdocsMUR/000057D4.pdf.

144 *Available at* http://eqs.fec.gov/eqsdocsMUR/0000615D.pdf.

I. The NRA-PVF Has Illegally Made Excessive and Unreported In-Kind Contributions to Josh Hawley for Senate

58. There is reason to believe that the NRA-PVF has made illegal, excessive, and unreported in-kind contributions to Josh Hawley for Senate by financing at least $973,411 in coordinated communications.

59. A political committee makes a "coordinated communication" when the communication (1) is paid for, in whole or in part, by a person other than the candidate or committee; (2) satisfies at least one of the "content standards" in the regulation, for example by "expressly advocat[ing] . . . the election or defeat of a clearly identified candidate for Federal office"; and (3) satisfies at least one of the "conduct standards" in the regulation, such as the use of a "common vendor," 11 C.F.R. § 109.21(a).

60. The NRA-PVF's communications in support of Hawley, and in opposition to his opponent, satisfy the "payment" prong because they were paid for in whole by the NRA-PVF. *Id.* § 109.21(a)(1).

61. The communications satisfy the "content" prong because they are public communications[145] that expressly advocated for the election of Hawley and the defeat of his opponent, Claire McCaskill. *Id.* § 109.21(c)(2).

62. As described *infra* ¶¶63-74, the NRA-PVF's communications satisfy the "conduct" prong at 11 C.F.R. § 109.21(a)(3) and (d)(4) through the use of two related sets of common vendors: Starboard/OnMessage, which created and produced the communications, and National Media/AMAG, which distributed and placed them.

Starboard/OnMessage

[145] A public communication is a "communication by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public, or any other form of general public political advertising." 11 C.F.R. § 100.26.

63. The NRA-PVF contracted with Starboard, a commercial vendor within the meaning of the regulation,[146] to create, produce, and/or distribute communications expressly advocating for Hawley or against his opponent. It reported payments to Starboard at the address 705 Melvin Avenue #105 in Annapolis, Maryland.

64. During the relevant time period, OnMessage provided several of the regulation's enumerated services to Hawley's principal campaign committee, Josh Hawley for Senate, which reported disbursements to OnMessage at its Maryland office, 705 Melvin Avenue #105 in Annapolis, Maryland.[147]

65. OnMessage, Inc. and Starboard Strategic, Inc. are functionally indistinguishable. The two entities are led by the same people[148]—including Bradley Todd, currently a consultant for Josh Hawley for Senate[149]—and the NRA-PVF reported payments to Starboard at OnMessage's Maryland office, which is consistent with past practices: during the 2014 and 2016 election cycles NRA-ILA and NRA-PVF consistently reported payments to Starboard at OnMessage's addresses,[150] and OnMessage has publicly taken credit for those advertisements that the NRA-ILA and NRA-PVF reported paying Starboard to produce (and has even won awards for such ads).[151] Former employees say that Starboard had no presence at OnMessage offices, an email from an OnMessage partner/Starboard director offering a job

---

146 OnMessage and Starboard are engaged in the regular business of content development and thus qualify as commercial vendors. *Id.* at § 116.1.

147 The enumerated services are "(A) Development of media strategy, including the selection or purchasing of advertising slots; (B) Selection of audiences; (C) Polling; (D) Fundraising; (E) Developing the content of a public communication; (F) Producing a public communication; (G) Identifying voters or developing voter lists, mailing lists, or donor lists; (H) Selecting personnel, contractors, or subcontractors; or (I) Consulting of otherwise providing political or media advice." *Id.* at § 109.21(d)(4)(ii). According to Josh Hawley for Senate's reports, OnMessage has provided services including "media production," "web ads," "political strategy consulting/travel," and "survey research." *See* sources cited ¶38.

148 *See* ¶¶ 15-16.

149 *See* ¶¶ 8, 15.

150 *See* ¶¶ 18-19, 22-23.

151 *See* ¶¶ 25-27.

at OnMessage was sent from his Starboard email address, and Starboard's partners have never publicly associated themselves with the company.[152] Therefore, although the two companies are incorporated separately, they appear to effectively function as a single vendor. Indeed, after years of NRA-ILA and NRA-PVF contracting with OnMessage, the individuals in charge of the firm created Starboard, and the NRA-ILA and NRA-PVF became effectively its only clients,[153] while the independent expenditures that Starboard created for the NRA-ILA and NRA-PVF supported candidates that were contracting with OnMessage.[154] In effect, the evidence indicates that Starboard was created as a shell company to hide OnMessage's status as a common vendor between the NRA-PVF and the candidates it supports.

66. The apparently deliberate routing of OnMessage's NRA business through the corporate shell of Starboard provides reason to believe that the purpose of OnMessage's creation of Starboard was to allow OnMessage to use or convey to the NRA-PVF information about the "plans, projects, activities or needs" of the candidates it supports—in this instance, Josh Hawley for Senate—and that here, such information was "material to the creation, production, or distribution" of the NRA-ILA's communications supporting Hawley.[155] This

---

152 *See* ¶¶ 31-32.

153 The 2013-14 election cycle was the only time a candidate or committee besides the two NRA entities listed Starboard as a vendor on reports filed with the Commission. In May 2013, the National Republican Congressional Committee (ID: C00075820) made two "media" disbursements to Starboard, totaling $18,500. National Republican Congressional Committee, Disbursements to Starboard Strategic, Inc., 2013-14, https://www.fec.gov/data/disbursements/?two_year_transaction_period=2014&data_type=processed&committee_id=C00075820&min_date=01%2F01%2F2013&max_date=12%2F31%2F2014.

154 *See* ¶¶ 20, 24.

155 Although a vendor may establish and implement a firewall in a written policy to prohibit the flow of strategic information from a political party or candidate to an independent expenditure committee, 11 C.F.R. § 109.21(h), there is no evidence of a firewall between Starboard and OnMessage. In any case, in promulgating the common vendor rules, the Commission dismissed the idea that "the mere existence of a confidentiality agreement or ethical screen should provide a *de facto* bar to the enforcement of the limits on coordinated communication imposed by Congress," and emphasized that "[w]ithout some mechanism to ensure enforcement, these private arrangements are unlikely to prevent the circumvention of the rules." 68 Fed. Reg. 421, 435 (Jan. 3, 2003).

inference is strengthened by the fact that Starboard director and OnMessage partner Brad Todd works as a "consultant" for Josh Hawley for Senate.[156]

National Media/AMAG

67. Additionally, during the same period that Josh Hawley for Senate was contracting with National Media and an affiliate to distribute its communications, the NRA-PVF was contracting with an entity that is legally indistinguishable from National Media to distribute communications expressly advocating for Hawley's election or against his opponent's election.

68. "Red Eagle" is a trade name for the political consulting firm National Media, according to Virginia Corporation Commission records.[157] AMAG is "affiliated" with National Media, according to its attorney.[158] National Media, Red Eagle, and AMAG are located at the same address—815 Slaters Lane in Alexandria, Virginia, the same address as OnMessage[159]—and documents filed with the FCC by Red Eagle and AMAG are signed by National Media employees.[160]

69. The NRA-PVF's independent expenditures supporting Hawley have been placed by Red Eagle, and the relevant contracts and documents were signed by National Media employees.[161] Josh Hawley for Senate advertisements have been placed by AMAG, and the

---

156 *See* sources cited ¶¶8, 15, 33-34. Additionally, Josh Hawley for Senate reported disbursements for enumerated services—such as "communications consulting"—to an entity called "First Tuesday," whose board includes Brad Todd and other Starboard/OnMessage board members, and whose principal office is at the same address as OnMessage's Virginia office. *See* sources cited *supra* ¶39. Josh Hawley for Senate reported paying First Tuesday at the same Annapolis, Maryland address at which it paid OnMessage, and at which the NRA-PVF paid Starboard. *Id.*

157 *See* ¶42.

158 *See* ¶46.

159 *See* ¶¶42-43, 46.

160 *See* ¶¶44, 47.

161 *See* ¶44.

relevant contracts and documents were signed by National Media employees.[162] Josh Hawley for Senate also directly reported $45,000 in payments to National Media for "digital consulting."[163]

70. In at least one instance, the same National Media official placed advertisements on behalf of the NRA-PVF and Josh Hawley for Senate at the same station on the same day.

a) On September 6, 2018, National Media "Director of Accounting" Jon Ferrell signed FCC records on behalf of Red Eagle placing the NRA-PVF's pro-Hawley ads on Missouri station KYTV. [164]

b) On that same day, National Media's Ferrell signed FCC records on behalf of AMAG as "Jon Ferrell, agent for Josh Hawley for Senate" for a "coordinated buy" on behalf of "Josh Hawley for Senate/NRSC," also placed on KYTV.[165]

71. These facts and patterns of activity provide reason to believe that the purpose of the NRA-PVF placing its advertisements under a National Media trade name, while Josh Hawley for Senate contracted directly with National Media or its affiliates, was to allow National Media to use or convey to the NRA-PVF information about the "plans, projects, activities or needs" of Josh Hawley for Senate without detection, and that such information was "material to the creation, production, or distribution" of the NRA-ILA's communications supporting Hawley.[166] This inference—and the apparent failure to comply with any firewall policy—is

---

162 *See* ¶47.
163 *See* ¶45.
164 *See, e.g.*, Exhibit J at 3.
165 Exhibit Q at 2-3.
166 Although a vendor may establish and implement a firewall in a written policy to prohibit the flow of strategic information from a political party or candidate to an independent expenditure committee, 11 C.F.R. § 109.21(h), there is no evidence of a firewall between Starboard and OnMessage. In any case, in promulgating the common vendor rules, the Commission dismissed the idea that "the mere existence of a confidentiality agreement or ethical screen should provide a *de facto* bar to the enforcement of the limits on coordinated communication imposed

demonstrated by the fact that the same National Media official placed advertisements on behalf of both the NRA-PVF and Josh Hawley for Senate on the same stations and on the same day.

72. Taken together, these facts suggest an elaborate scheme designed to evade detection of violations of the Commission's common vendor coordination rules. OnMessage, led by Josh Hawley for Senate's top campaign consultant, appears to have deliberately routed the NRA-PVF's independent expenditures supporting Hawley through the corporate shell of Starboard, while Hawley's committee directly contracted with OnMessage. Then, those pro-Hawley communications were distributed and placed by National Media employees under the "Red Eagle" trade name, while Josh Hawley for Senate placed its own communications using National Media or its affiliate AMAG. In at least one instance, the same National Media official placed advertisements on behalf of both the NRA-PVF and Josh Hawley for Senate on the same stations and on the same day. The coordinated nature of this scheme is further demonstrated by the fact that all of the relevant companies or shell companies—OnMessage, Starboard, National Media, Red Eagle, American Media & Advocacy Group—are located or have been paid at the same addresses.

73. These facts and this pattern of activity provide reason to believe that Starboard/OnMessage and National Media used or conveyed to the NRA-PVF information about the "plans, projects, activities or needs" of Josh Hawley for Senate, and that such information was "material to the creation, production, [and] distribution of the communication[s]," *id.* § 109.21(d)(4).

---

by Congress," and emphasized that "[w]ithout some mechanism to ensure enforcement, these private arrangements are unlikely to prevent the circumvention of the rules." 68 Fed. Reg. 421, 435 (Jan. 3, 2003).

74. For these reasons, there is reason to believe that the NRA-PVF and Josh Hawley for Senate satisfied the "conduct" standard by coordinating their communications through a "common vendor." 11 C.F.R. § 109.21(d)(4).

75. A payment for a coordinated communication is an in-kind contribution to the candidate committee or political party committee with which it is coordinated. 11 C.F.R. § 109.21(b).

76. Therefore, because the NRA-PVF's advertisements supporting Hawley satisfy Section 109.21's three-prong test, there is reason to believe that the NRA-PVF has made in-kind contributions to Josh Hawley for Senate in the form of coordinated communications, in excess of FECA's $2,700 limit on contributions by a non-multicandidate political committee to a candidate, 52 U.S.C. § 30116(a)(1), and in violation of FECA's reporting requirements. 52 U.S.C. § 30104(b).

PRAYER FOR RELIEF

77. Wherefore, the Commission should find reason to believe that the NRA-PVF and Josh Hawley for Senate violated 52 U.S.C. § 30101 *et seq.*, and should conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).

78. 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
Washington, DC 20005
(202) 736-2200

Giffords, by
Alison Damaskos
P.O. Box 51196
Washington, DC 20091
(571) 295-7807

Brendan M. Fischer
Campaign Legal Center
1411 K Street, NW, Suite 1400
Washington, DC 20005
Counsel to the Campaign Legal Center

David Pucino
Giffords Law Center to Prevent Gun Violence
223 W. 38th Street #90
New York, NY 10018
Counsel to Giffords

October 22, 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 Campaign Legal Center

Brendan M. Fischer

Sworn to and subscribed before me this 22 day of October 2018.

Notary Public

For Giffords

Alison Damaskos

Sworn to and subscribed before me this 22nd day of October 2018.

Bianca Gutierrez

Notary Public

BIANCA GUTIERREZ
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires September 30, 2020

EXHIBIT A

1303530890

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

Office of the Clerk

March 22, 2013

CRAIG M PALIK
1947 BARTON HILL ROAD
RESTON, VA 20191

RECEIPT

RE: Starboard Strategic, Inc.

ID: 07626674

DCN: 13-03-22-5705

Dear Customer:

This is your receipt for $75.00 to cover the fee(s) for filing articles of incorporation with this office.

The effective date of the certificate of incorporation is March 22, 2013.

If you have any questions, please call (804) 371-9733 or toll-free in Virginia, 1-866-722-2551.

Sincerely,

Joel H. Peck

Joel H. Peck
Clerk of the Commission

CORPRCPT
NEWCD
CISECOM

P.O. Box 1197, Richmond, VA 23218-1197
Tyler Building, First Floor, 1300 East Main Street, Richmond, VA 23219-3630
Clerk's Office (804) 371-9733 or (866) 722-2551 (toll-free in Virginia) www.scc.virginia.gov/clk
Telecommunications Device for the Deaf-TDD/Voice: (804) 371-9206

1303530890

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

AT RICHMOND, MARCH 22, 2013

The State Corporation Commission has found the accompanying articles submitted on behalf of

Starboard Strategic, Inc.

to comply with the requirements of law, and confirms payment of all required fees. Therefore, it is ORDERED that this

CERTIFICATE OF INCORPORATION

be issued and admitted to record with the articles of incorporation in the Office of the Clerk of the Commission, effective March 22, 2013.

The corporation is granted the authority conferred on it by law in accordance with the articles, subject to the conditions and restrictions imposed by law.

STATE CORPORATION COMMISSION

By

James C. Dimitri
Commissioner

CORPACPT
CISECOM
13-03-22-5705

eFile

1303530890

ARTICLES OF INCORPORATION
OF
STARBOARD STRATEGIC, INC.

The undersigned, pursuant to Chapter 9 of Title 13.1 of the Code of Virginia, states as follows:

1. The name of the corporation is Starboard Strategic, Inc.

2. The purpose for which the corporation is formed is to engage in any lawful business not required to be specifically set forth in these Articles for which a corporation may be incorporated under the Virginia Stock Corporation Act.

3. The corporation is authorized to issue 1,000 shares of common stock with a par value of $1.0000 per share.

4. The name of the corporation's initial registered agent is Craig M Palik. The initial registered agent is an individual who is a resident of Virginia and a member of the Virginia State Bar.

5. The address of the corporation's initial registered office, which is identical to the business office of the initial registered agent, is 1947 Barton Hill Road, Reston, VA 20191. The initial registered office is located in Fairfax County, Virginia.

6. The following individuals are to serve as an initial director of the corporation:

Name	Address
Curtis Anderson	1947 Barton Hill Road Reston, VA 20191
Wesley Anderson	1947 Barton Hill Road Reston, VA 20191
Bradley Todd	1947 Barton Hill Road Reston, VA 20191
Graham Shafer	1947 Barton Hill Road Reston, VA 20191
Timothy Teepell	1947 Barton Hill Road Reston, VA 20191

7. The address of the corporation's principal office is 1947 Barton Hill Road, Reston, VA 20191.

1303530890

INCORPORATOR:

/s/ Garth E. Beall Date: March 22, 2013
Garth E. Beall

EXHIBIT B

MUR752400043

2013 ANNUAL REPORT
COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

21305.3487--3/13/2013

File online at
sccefile.scc.virginia.gov

1. CORPORATION NAME:
OnMessage, Inc.

DUE DATE: **04/30/13**

2. VA REGISTERED AGENT NAME AND OFFICE ADDRESS: ATTY.
FRANK SOFOCLEOUS

706 S WASHINGTON ST

FALLS CHURCH, VA 22046

SCC ID NO.: **0636043-2**

3. CITY OR COUNTY OF VA REGISTERED OFFICE:
304-FALLS CHURCH CITY (FILED I

4. STATE OR COUNTRY OF INCORPORATION:
VA-VIRGINIA

5. STOCK INFORMATION

CLASS	AUTHORIZED
COMV	1,000

DO NOT ATTEMPT TO ALTER THE INFORMATION ABOVE. Carefully read the enclosed instructions. Type or print in black only.

6. PRINCIPAL OFFICE ADDRESS:

☐ Mark this box if address shown below is correct	If the block to the left is blank or contains incorrect data please add or correct the address below.
ADDRESS: 815 SLATERS LANE	ADDRESS:
CITY/ST/ZIP ALEXANDRIA, VA 22314	CITY/ST/ZIP

7. DIRECTORS AND PRINCIPAL OFFICERS:

All directors and principal officers must be listed.
An individual may be designated as both a director and an officer.

Mark appropriate box unless area below is blank: [ ] Information is correct [ ] Information is incorrect [ ] Delete Information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: [ ] Correction [ ] Addition [ ] Replacement
OFFICER [X] DIRECTOR [X]	OFFICER [ ] DIRECTOR [ ]
NAME: CURTIS ANDERSON	NAME:
TITLE: PRESIDENT	TITLE:
ADDRESS: 2000 COLE RIDGE LANE	ADDRESS:
CITY/ST/ZIP: CROWNSVILLE, MD 21032	CITY/ST/ZIP:

I affirm that the information contained in this report is accurate and complete as of the date below.

SIGNATURE OF DIRECTOR/OFFICER LISTED IN THIS REPORT	Wes Anderson PRINTED NAME AND CORPORATE TITLE	3-9-13 DATE

It is a Class 1 misdemeanor for any person to sign a document that is false in any material respect with intent that the document be delivered to the Commission for filing.

+ 0415544 000004282 09SCC1

AF00ZV Rev 16 2/11

2013 ANNUAL REPORT CONTINUED

21305.3487--3/13/2013

CORPORATION NAME:
OnMessage, Inc.

DUE DATE: 04/30/13
SCC ID NO.: 0636043-2

7. DIRECTORS AND PRINCIPAL OFFICERS (continued):

All directors and principal officers must be listed.
An individual may be designated as both a director and an officer.

Mark appropriate box unless area below is blank: [ ] Information is correct [ ] Information is incorrect [ ] Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: [ ] Correction [ ] Addition [ ] Replacement
OFFICER [X] DIRECTOR [X]	OFFICER [ ] DIRECTOR [ ]
NAME: WESLEY ANDERSON	NAME:
TITLE: CEO	TITLE:
ADDRESS: 2512 CHAPMAN LN	ADDRESS:
CITY/ST/ZIP: DAVIDSONVILLE, MD 21035	CITY/ST/ZIP:

Mark appropriate box unless area below is blank: [ ] Information is correct [ ] Information is incorrect [ ] Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: [ ] Correction [ ] Addition [ ] Replacement
OFFICER [X] DIRECTOR [X]	OFFICER [ ] DIRECTOR [ ]
NAME: BRADLEY TODD	NAME:
TITLE: COO	TITLE:
ADDRESS: 722 SOUTH FAIRFAX	ADDRESS:
CITY/ST/ZIP: ALEXANDRIA, VA 22314	CITY/ST/ZIP:

Mark appropriate box unless area below is blank: [ ] Information is correct [ ] Information is incorrect [ ] Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: [ ] Correction [ ] Addition [ ] Replacement
OFFICER [ ] DIRECTOR [ ]	OFFICER [ ] DIRECTOR [ ]
NAME:	NAME:
TITLE:	TITLE:
ADDRESS:	ADDRESS:
CITY/ST/ZIP:	CITY/ST/ZIP:

Mark appropriate box unless area below is blank: [ ] Information is correct [ ] Information is incorrect [ ] Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: [ ] Correction [ ] Addition [ ] Replacement
OFFICER [ ] DIRECTOR [ ]	OFFICER [ ] DIRECTOR [ ]
NAME:	NAME:
TITLE:	TITLE:
ADDRESS:	ADDRESS:
CITY/ST/ZIP:	CITY/ST/ZIP:

AF002W Rev 3 3/11

+ 0415544 000004282 09SCC1

EXHIBIT C

21408.8501--6/5/2014

2014 ANNUAL REPORT
COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

File online at
sccefile.scc.virginia.gov

1. CORPORATION NAME:
OnMessage, Inc.

DUE DATE: **04/30/14**

2. VA REGISTERED AGENT NAME AND OFFICE ADDRESS: ATTY.
FRANK SOFOCLEOUS

706 S WASHINGTON ST

FALLS CHURCH, VA 22046

SCC ID NO.: **0636043-2**

3. CITY OR COUNTY OF VA REGISTERED OFFICE:
304-FALLS CHURCH CITY (FILED I

4. STATE OR COUNTRY OF INCORPORATION:
VA-VIRGINIA

5. STOCK INFORMATION

CLASS	AUTHORIZED
COMV	1,000

DO NOT ATTEMPT TO ALTER THE INFORMATION ABOVE. Carefully read the enclosed instructions. Type or print in black only.

6. PRINCIPAL OFFICE ADDRESS:

☐ Mark this box if address shown below is correct	If the block to the left is blank or contains incorrect data please add or correct the address below.
ADDRESS: 815 SLATERS LANE	ADDRESS:
CITY/ST/ZIP ALEXANDRIA, VA 22314	CITY/ST/ZIP

2014 JUN -5 AM 10:4

7. DIRECTORS AND PRINCIPAL OFFICERS: All directors and principal officers must be listed. An individual may be designated as both a director and an officer.

Mark appropriate box unless area below is blank: ☐ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒	OFFICER ☐ DIRECTOR ☐
NAME: CURTIS ANDERSON	NAME:
TITLE: PRESIDENT	TITLE:
ADDRESS: 2000 COLE RIDGE LANE	ADDRESS:
CITY/ST/ZIP: CROWNSVILLE, MD 21032	CITY/ST/ZIP:

I affirm that the information contained in this report is accurate and complete as of the date below.

SIGNATURE OF DIRECTOR/OFFICER LISTED IN THIS REPORT

Wes Anderson CEO
PRINTED NAME AND CORPORATE TITLE

6-2-14
DATE

It is a Class 1 misdemeanor for any person to sign a document that is false in any material respect with intent that the document be delivered to the Commission for filing.

+ 0467346 000003012 09SCC1

AF002V Rev 16 2111

21408.8501--6/5/2014

2014 ANNUAL REPORT CONTINUED

CORPORATION NAME:
OnMessage, Inc.

DUE DATE: 04/30/14
SCC ID NO.: 0636043-2

7. DIRECTORS AND PRINCIPAL OFFICERS (continued):

All directors and principal officers must be listed.
An individual may be designated as both a director and an officer.

Mark appropriate box unless area below is blank: ☐ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☒ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒ NAME: WESLEY ANDERSON TITLE: CEO ADDRESS: 2512 CHAPMAN LN CITY/ST/ZIP: DAVIDSONVILLE, MD 21035	OFFICER ☒ DIRECTOR ☒ NAME: Graham Shafer TITLE: Partner ADDRESS: 2203 South Rd CITY/ST/ZIP: Baltimore MD 21209
Mark appropriate box unless area below is blank: ☐ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☒ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒ NAME: BRADLEY TODD TITLE: COO ADDRESS: 722 SOUTH FAIRFAX CITY/ST/ZIP: ALEXANDRIA, VA 22314	OFFICER ☒ DIRECTOR ☒ NAME: Timothy Teepell TITLE: Partner ADDRESS: 305 Woodstone DR CITY/ST/ZIP: Baton Rouge, LA 70810
Mark appropriate box unless area below is blank: ☐ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☒ Addition ☐ Replacement
OFFICER ☐ DIRECTOR ☐ NAME: TITLE: ADDRESS: CITY/ST/ZIP:	OFFICER ☒ DIRECTOR ☐ NAME: Orrin Harrison TITLE: Partner ADDRESS: 414 Tyler PL CITY/ST/ZIP: Alexandria, VA 22302
Mark appropriate box unless area below is blank: ☐ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☐ DIRECTOR ☐ NAME: TITLE: ADDRESS: CITY/ST/ZIP:	OFFICER ☐ DIRECTOR ☐ NAME: TITLE: ADDRESS: CITY/ST/ZIP:

AF00ZW Rev 3 3/11

+ 0467346 000003012 09SCC1

EXHIBIT D

21504.3887--2/27/2015

2150438887

2015 ANNUAL REPORT
COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

File online at
sccefile.scc.virginia.gov

1. CORPORATION NAME:
   Starboard Strategic, Inc.

DUE DATE: **03/31/15**

SCC ID NO.: **0762667-4**

2. VA REGISTERED AGENT NAME AND OFFICE ADDRESS: ATTY.
   CRAIG M PALIK
   1947 BARTON HILL ROAD
   RESTON, VA 20191

3. CITY OR COUNTY OF VA REGISTERED OFFICE:
   129-FAIRFAX COUNTY

4. STATE OR COUNTRY OF INCORPORATION:
   VA-VIRGINIA

5. STOCK INFORMATION

CLASS	AUTHORIZED
COMMON	1,000

DO NOT ATTEMPT TO ALTER THE INFORMATION ABOVE. Carefully read the enclosed instructions. Type or print in black only.

6. PRINCIPAL OFFICE ADDRESS:

☒ Mark this box if address shown below is correct	If the block to the left is blank or contains incorrect data please add or correct the address below.
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:
CITY/ST/ZIP RESTON, VA 20191	CITY/ST/ZIP

2015 FEB 27 PM 12: 20

7. DIRECTORS AND PRINCIPAL OFFICERS: All directors and principal officers must be listed. An individual may be designated as both a director and an officer.

Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☒ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒	OFFICER ☒ DIRECTOR ☒
NAME: CURTIS ANDERSON	NAME: Orrin Harrison
TITLE: PRESIDENT	TITLE: Partner
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS: 414 Tyler Place
CITY/ST/ZIP: RESTON, VA 20191	CITY/ST/ZIP: Alexandria, VA 22302

I affirm that the information contained in this report is accurate and complete as of the date below.

SIGNATURE OF DIRECTOR/OFFICER LISTED IN THIS REPORT	GRAHAM SHAFER PRINTED NAME AND CORPORATE TITLE	2.24.15 DATE

It is a Class 1 misdemeanor for any person to sign a document that is false in any material respect with intent that the document be delivered to the Commission for filing.

21504.3887--2/27/2015

215043887

2015 ANNUAL REPORT CONTINUED

CORPORATION NAME:
Starboard Strategic, Inc.

DUE DATE: 03/31/15
SCC ID NO.: 0762667-4

All directors and principal officers must be listed.
An individual may be designated as both a director and an officer.

7. DIRECTORS AND PRINCIPAL OFFICERS: (continued)

Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒ NAME: WESLEY ANDERSON TITLE: PRESIDENT ADDRESS: 1947 BARTON HILL ROAD CITY/ST/ZIP: RESTON, VA 20191	OFFICER ☐ DIRECTOR ☐ NAME: TITLE: ADDRESS: CITY/ST/ZIP:
Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒ NAME: BRADLEY TODD TITLE: PRESIDENT ADDRESS: 1947 BARTON HILL ROAD CITY/ST/ZIP: RESTON, VA 20191	OFFICER ☐ DIRECTOR ☐ NAME: TITLE: ADDRESS: CITY/ST/ZIP:
Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☐ NAME: GRAHAM SHAFER TITLE: PRESIDENT ADDRESS: 1947 BARTON HILL ROAD CITY/ST/ZIP: RESTON, VA 20191	OFFICER ☐ DIRECTOR ☐ NAME: TITLE: ADDRESS: CITY/ST/ZIP:
Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☐ NAME: TIMOTHY TEEPELL TITLE: VICE PRESIDENT ADDRESS: 1947 BARTON HILL ROAD CITY/ST/ZIP: RESTON, VA 20191	OFFICER ☐ DIRECTOR ☐ NAME: TITLE: ADDRESS: CITY/ST/ZIP:

0002025

EXHIBIT E

2018 ANNUAL REPORT
COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

1. CORPORATION NAME:
   Starboard Strategic, Inc.

DUE DATE: **03/31/18**

SCC ID NO.: **0762667-4**

2. VA REGISTERED AGENT NAME AND OFFICE ADDRESS: ATTY.
   CRAIG M PALIK
   1947 BARTON HILL ROAD
   RESTON, VA 20191

3. CITY OR COUNTY OF VA REGISTERED OFFICE:
   129-FAIRFAX COUNTY

4. STATE OR COUNTRY OF INCORPORATION:
   VA-VIRGINIA

5. STOCK INFORMATION

CLASS	AUTHORIZED
COMMON	1,000

DO NOT ATTEMPT TO ALTER THE INFORMATION ABOVE. Carefully read the enclosed instructions. Type or print in black only.

6. PRINCIPAL OFFICE ADDRESS:

☐ Mark this box if address shown below is correct	If the block to the left is blank or contains incorrect data please add or correct the address below.
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:
CITY/ST/ZIP RESTON, VA 20191	CITY/ST/ZIP

7. DIRECTORS AND PRINCIPAL OFFICERS: All directors and principal officers must be listed. An individual may be designated as both a director and an officer.

Mark appropriate box unless area below is blank: ☑ Information is correct ☐ Information is Incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒	OFFICER ☐ DIRECTOR ☐
NAME: CURT ANDERSON	NAME:
TITLE: PRESIDENT	TITLE:
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:
CITY/ST/ZIP: RESTON, VA 20191	CITY/ST/ZIP:

I affirm that the information contained in this report is accurate and complete as of the date below.

SIGNATURE OF DIRECTOR/OFFICER LISTED IN THIS REPORT	PRINTED NAME AND CORPORATE TITLE	DATE
	Partner, Curt Anderson	2/27/18

It is a Class 1 misdemeanor for any person to sign a document that is false in any material respect with intent that the document be delivered to the Commission for filing.

0002108

7180456 3

2018 ANNUAL REPORT CONTINUED

CORPORATION NAME:
Starboard Strategic, Inc.

DUE DATE: **03/31/18**
SCC ID NO.: **0762667-4**

2189459 63

7. DIRECTORS AND PRINCIPAL OFFICERS: (continued)

All directors and principal officers must be listed.
An individual may be designated as both a director and an officer.

Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☐ NAME: GRAHAM SHAFER TITLE: PRESIDENT ADDRESS: 1947 BARTON HILL ROAD CITY/ST/ZIP: RESTON, VA 20191	OFFICER ☐ DIRECTOR ☐ NAME: TITLE: ADDRESS: CITY/ST/ZIP:
Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☐ NAME: TIMOTHY TEEPELL TITLE: VICE PRESIDENT ADDRESS: 1947 BARTON HILL ROAD CITY/ST/ZIP: RESTON, VA 20191	OFFICER ☐ DIRECTOR ☐ NAME: TITLE: ADDRESS: CITY/ST/ZIP:
Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒ NAME: WES ANDERSON TITLE: PARTNER ADDRESS: 2512 CHAPMAN LANE CITY/ST/ZIP: DAVIDSONVILLE, MD 21035	OFFICER ☐ DIRECTOR ☐ NAME: TITLE: ADDRESS: CITY/ST/ZIP:
Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒ NAME: ORRIN HARRISON TITLE: PARTNER ADDRESS: 414 TYLER PLACE CITY/ST/ZIP: ALEXANDRIA, VA 22302	OFFICER ☐ DIRECTOR ☐ NAME: TITLE: ADDRESS: CITY/ST/ZIP:

0002106

Addition

officer ☒ Director ☒

Brad Todd
Partner
307 West Walnut Street
Alexandria, VA 22301

EXHIBIT F

2018 ANNUAL REPORT
COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

1. CORPORATION NAME:
   OnMessage, Inc.

DUE DATE: **04/30/18**

2. VA REGISTERED AGENT NAME AND OFFICE ADDRESS: ATTY.
   FRANK SOFOCLEOUS
   706 S WASHINGTON ST
   FALLS CHURCH, VA 22046

SCC ID NO.: **0636043-2**

5. STOCK INFORMATION

CLASS	AUTHORIZED
COMV	1,000

3. CITY OR COUNTY OF VA REGISTERED OFFICE:
   304-FALLS CHURCH CITY (FILED I

4. STATE OR COUNTY OF INCORPORATION:
   VA-VIRGINIA

DO NOT ATTEMPT TO ALTER THE INFORMATION ABOVE. Carefully read the enclosed instructions. Type or print in black only.

6. PRINCIPAL OFFICE ADDRESS:

☐ Mark this box if address shown below is correct	If the block to the left is blank or contains incorrect data please add or correct the address below.
ADDRESS: 815 SLATERS LANE	ADDRESS:
CITY/ST/ZIP ALEXANDRIA, VA 22314	CITY/ST/ZIP

7. DIRECTORS AND PRINCIPAL OFFICERS: All directors and principal officers must be listed. An individual may be designated as both a director and an officer.

Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒	OFFICER ☐ DIRECTOR ☐
NAME: CURTIS ANDERSON	NAME:
TITLE: PARTNER	TITLE:
ADDRESS: 2000 COLERIDGE LANE	ADDRESS:
CITY/ST/ZIP: CROWNSVILLE, MD 21032	CITY/ST/ZIP:

I affirm that the information contained in this report is accurate and complete as of the date below.

SIGNATURE OF DIRECTOR/OFFICER LISTED IN THIS REPORT	Curt Anderson, Partner PRINTED NAME AND CORPORATE TITLE	2/27/18 DATE

It is a Class 1 misdemeanor for any person to sign a document that is false in any material respect with intent that the document be delivered to the Commission for filing.

0003055

2180459995

2018 ANNUAL REPORT CONTINUED

CORPORATION NAME:
OnMessage, Inc.

DUE DATE: **04/30/18**
SCC ID NO.: **0636043-2**

2180459 95

7. DIRECTORS AND PRINCIPAL OFFICERS: (continued)

All directors and principal officers must be listed.
An individual may be designated as both a director and an officer.

Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒	OFFICER ☐ DIRECTOR ☐
NAME: ORRIN HARRISON	NAME:
TITLE: PARTNER	TITLE:
ADDRESS: 414 TYLER PLACE	ADDRESS:
CITY/ST/ZIP: ALEXANDRIA, VA 22302	CITY/ST/ZIP:

Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒	OFFICER ☐ DIRECTOR ☐
NAME: GRAHAM SHAFER	NAME:
TITLE: PARTER	TITLE:
ADDRESS: 2203 SOUTH RD	ADDRESS:
CITY/ST/ZIP: BALTIMORE, MD 21209	CITY/ST/ZIP:

Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒	OFFICER ☐ DIRECTOR ☐
NAME: TIMOTHY TEEPELL	NAME:
TITLE: PARTNER	TITLE:
ADDRESS: 305 WOODSTONE DR	ADDRESS:
CITY/ST/ZIP: BATON ROUGE, LA 70810	CITY/ST/ZIP:

Mark appropriate box unless area below is blank: ☒ Information is correct ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: ☐ Correction ☐ Addition ☐ Replacement
OFFICER ☒ DIRECTOR ☒	OFFICER ☐ DIRECTOR ☐
NAME: BRAD TODD	NAME:
TITLE: PARTNER	TITLE:
ADDRESS: 307 WEST WALNUT ST.	ADDRESS:
CITY/ST/ZIP: ALEXANDRIA, VA 22301	CITY/ST/ZIP:

0003055

Addition
officer ☒ Director ☒
Wesley Anderson
2512 Chapman Ln
Davidsonville, MD 21035

EXHIBIT G

Contract Agreement Between:

CONTRACT

KOAM
2950 Highway 69 NE
P. O. Box 659
Pittsburg, KS 66762
(417)624-0233

And:

Red Eagle Media
815 Slaters Lane
Alexandria, VA 22314

Contract / Revision	Alt Order #
81109 /	26143436

Product
MO Senate

Contract Dates	Estimate #
10/01/18 - 10/21/18	**9911**

Advertiser	Original Date / Revision
NRA-PVF	09/06/18 / 09/06/18

Billing Cycle	Billing Calendar	Cash/Trade
EOM/EOC	Broadcast	Cash
Station	**Account Executive**	**Sales Office**
KOAM	Bill Thomas	Washington DC

Special Handling

Demographic
Adults 35+

IDB#	Advertiser Code	Product Code
9915593	388	1209

Agency Ref	Advertiser Ref

*Line	Ch	Start Date	End Date	Description	Start/End Time	Days	Length	Spots/ Week	Rate	Type	Spots	Amount
N 1	KOAM	10/01/18	10/19/18	KOAM Morning News	530a-7a		:30			NM	15	$8,250.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
	Week:	10/01/18	10/07/18	MTWTF--	5	$550.00						
	Week:	10/08/18	10/14/18	MTWTF--	5	$550.00						
	Week:	10/15/18	10/21/18	MTWTF--	5	$550.00						
N 2	KOAM	10/01/18	10/19/18	CBS This Morning	7-9a		:30			NM	15	$7,500.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
	Week:	10/01/18	10/07/18	MTWTF--	5	$500.00						
	Week:	10/08/18	10/14/18	MTWTF--	5	$500.00						
	Week:	10/15/18	10/21/18	MTWTF--	5	$500.00						
N 3	KOAM	10/01/18	10/19/18	M-F 9-10a	9-10a		:30			NM	3	$480.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
	Week:	10/01/18	10/07/18	MTWTF--	1	$160.00						
	Week:	10/08/18	10/14/18	MTWTF--	1	$160.00						
	Week:	10/15/18	10/21/18	MTWTF--	1	$160.00						
N 4	KOAM	10/01/18	10/19/18	Price is Right	10-11a		:30			NM	6	$3,300.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
	Week:	10/01/18	10/07/18	MTWTF--	2	$550.00						
	Week:	10/08/18	10/14/18	MTWTF--	2	$550.00						
	Week:	10/15/18	10/21/18	MTWTF--	2	$550.00						
N 5	KOAM	10/01/18	10/19/18	KOAM News at Noon	12n-1230p		:30			NM	6	$4,200.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
	Week:	10/01/18	10/07/18	MTWTF--	2	$700.00						
	Week:	10/08/18	10/14/18	MTWTF--	2	$700.00						
	Week:	10/15/18	10/21/18	MTWTF--	2	$700.00						
N 6	KOAM	10/01/18	10/19/18	KOAM News At 5pm	5-530p		:30			NM	4	$5,200.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
	Week:	10/01/18	10/07/18	MTWTF--	1	$1,300.00						
	Week:	10/08/18	10/14/18	MTWTF--	2	$1,300.00						
	Week:	10/15/18	10/21/18	MTWTF--	1	$1,300.00						
N 7	KOAM	10/01/18	10/19/18	KOAM News at 6pm	6-630p		:30			NM	15	$22,500.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
	Week:	10/01/18	10/07/18	MTWTF--	5	$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, on 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.

QueenB Television of Kansas/Missouri LLC, through its subsidiary KOAM-TV, and Sagamore Hill of Missouri LLC, through its subsidiary KFJX-TV, prohibit all forms of discrimination in advertising contracts. We do not and shall not discriminate on the basis of race or gender regarding advertising practices.

Contract Agreement Between:

KOAM
2950 Highway 69 NE
P. O. Box 659
Pittsburg, KS 66762
(417)624-0233

Contract / Revision	Alt Order #
81109 /	26143436

Contract Dates	Product	Estimate #
10/01/18 - 10/21/18	MO Senate	**9911**

Advertiser	Original Date / Revision
NRA-PVF	09/06/18 / 09/06/18

*Line	Ch	Start Date	End Date	Description	Start/End Time	Days	Length	Spots/ Week	Rate	Type	Spots	Amount
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/08/18	10/14/18	MTWTF--	5	$1,500.00						
Week:		10/15/18	10/21/18	MTWTF--	5	$1,500.00						
N 8	KOAM	10/01/18	10/19/18	Wheel of Fortune M-F	630-7p		:30			NM	6	$15,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/01/18	10/07/18	MTWTF--	2	$2,500.00						
Week:		10/08/18	10/14/18	MTWTF--	2	$2,500.00						
Week:		10/15/18	10/21/18	MTWTF--	2	$2,500.00						
N 9	KOAM	10/06/18	10/20/18	Wheel of Fortune Sat	630-7p		:30			NM	4	$3,200.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/01/18	10/07/18	-----S-	1	$800.00						
Week:		10/08/18	10/14/18	-----S-	2	$800.00						
Week:		10/15/18	10/21/18	-----S-	1	$800.00						
N 10	KOAM	10/09/18	10/09/18	Tuesday 7-8p	7-8p		:30			NM	1	$2,400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/08/18	10/14/18	-T-----	1	$2,400.00						
N 11	KOAM	10/02/18	10/16/18	Tuesday 8-9p	8-9p		:30			NM	2	$4,400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/01/18	10/07/18	-T-----	1	$2,200.00						
Week:		10/08/18	10/14/18	-------	0	$0.00						
Week:		10/15/18	10/21/18	-T-----	1	$2,200.00						
N 12	KOAM	10/19/18	10/19/18	Friday 7-8p	7-8p		:30			NM	1	$1,400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/15/18	10/21/18	----F--	1	$1,400.00						
N 13	KOAM	10/12/18	10/12/18	Friday 8-9p	8-9p		:30			NM	1	$1,400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/08/18	10/14/18	----F--	1	$1,400.00						
N 14	KOAM	10/05/18	10/19/18	Friday 9-10p	9-10p		:30			NM	2	$2,800.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/01/18	10/07/18	----F--	1	$1,400.00						
Week:		10/08/18	10/14/18	-------	0	$0.00						
Week:		10/15/18	10/21/18	----F--	1	$1,400.00						
N 15	KOAM	10/01/18	10/19/18	KOAM News at 10p	10-1035p		:30			NM	5	$9,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/01/18	10/07/18	MTWTF--	2	$1,800.00						
Week:		10/08/18	10/14/18	MTWTF--	1	$1,800.00						
Week:		10/15/18	10/21/18	MTWTF--	2	$1,800.00						
N 16	KOAM	10/06/18	10/20/18	KOAM News at 10p	10-1035p		:30			NM	3	$3,300.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/01/18	10/07/18	-----S-	1	$1,100.00						
Week:		10/08/18	10/14/18	-----S-	1	$1,100.00						
Week:		10/15/18	10/21/18	-----S-	1	$1,100.00						
N 17	KOAM	10/07/18	10/14/18	KOAM News at 10p	10-1035p		:30			NM	2	$2,500.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/01/18	10/07/18	------S	1	$1,250.00						
Week:		10/08/18	10/14/18	------S	1	$1,250.00						
N 18	KOAM	10/01/18	10/19/18	M-F 1035p-1137p	1035-1137p		:30			NM	9	$3,150.00
		Start Date	End Date	Weekdays	Spots/Week	Rate						
Week:		10/01/18	10/07/18	MTWTF--	3	$350.00						
Week:		10/08/18	10/14/18	MTWTF--	3	$350.00						

(* 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, on 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.

QueenB Television of Kansas/Missouri LLC, through its subsidiary KOAM-TV, and Sagamore Hill of Missouri LLC, through its subsidiary KFJX-TV, prohibit all forms of discrimination in advertising contracts. We do not and shall not discriminate on the basis of race or gender regarding advertising practices.

Contract Agreement Between:

KOAM
2950 Highway 69 NE
P. O. Box 659
Pittsburg, KS 66762
(417)624-0233

Contract / Revision	Alt Order #
81109 /	26143436

Contract Dates	Product	Estimate #
10/01/18 - 10/21/18	MO Senate	**9911**

Advertiser	Original Date / Revision
NRA-PVF	09/06/18 / 09/06/18

*Line	Ch	Start Date	End Date	Description	Start/End Time	Days	Length	Spots/ Week	Rate	Type	Spots	Amount
		Start Date	End Date	Weekdays	Spots/Week				Rate			
Week:		10/15/18	10/21/18	MTWTF--	3				$350.00			
N	19	KOAM 10/06/18	10/20/18	Sat 1035-1105p	1035-1105p		:30			NM	3	$900.00
		Start Date	End Date	Weekdays	Spots/Week				Rate			
Week:		10/01/18	10/07/18	-----S-	1				$300.00			
Week:		10/08/18	10/14/18	-----S-	1				$300.00			
Week:		10/15/18	10/21/18	-----S-	1				$300.00			
									Totals		103	$100,880.00

Time Period	# of Spots	Gross Amount	Agency Comm.	Net Amount
10/01/18 -10/20/18	103	$100,880.00	($15,132.00)	$85,748.00
Totals	103	$100,880.00	($15,132.00)	$85,748.00

Signature: _____ **Date:** _____

(* 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, on 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.

QueenB Television of Kansas/Missouri LLC, through its subsidiary KOAM-TV, and Sagamore Hill of Missouri LLC, through its subsidiary KFJX-TV, prohibit all forms of discrimination in advertising contracts. We do not and shall not discriminate on the basis of race or gender regarding advertising practices.

EXHIBIT H

POLITICAL FILE DISCLOSURE FORM FOR *NON-CANDIDATE* TIME PURCHASE REQUESTS RELATING TO A POLITICAL MATTER OF NATIONAL IMPORTANCE
(to be completed in full at the time of the initial purchase request and supplemented as necessary--for example, if the purchaser should provide multiple spots with different reportable content)

Request was: [X] Accepted O Rejected

Check one: [X] Original Form O Supplement to Form (Date: _____)

Station: WRTV
Date of purchase request: 10/3/18
Responsible Station employee: Jennifer Hyslop

Agency: Red Eagle Media Group
Contact person: Michael Eyerman

Address: 815 Slaters Lane, Alexandria, VA 22314

Phone #: (202) 872-1155

List **all** issues of national importance referenced (if none, state "None"): to be filled out upon receiving spot

List **all** candidates referenced **and** the office that that candidate is seeking—whether or not the office is mentioned in the spot (if none, state "None"): to be filled out upon receiving spot

List every Federal election referenced in the spot (if none, state "None"): to be filled out upon receiving spot

---

Sponsor (full name): America First Action
Address: 2205 Main Line Blvd. Alexandria, VA 222301
Phone #: Phone Number not listed/found in google search, Website: https://www.a1apac.org/
Contact person (if different from Agency contact): N/A

List of the Sponsor's chief executive officers or members of its executive committee or members of its board of directors*:
Jon Proch – Treasurer
Brain Walsh - President

*If the purchaser provided only one name or if there is any other reason to believe that the "list" provided is not accurate and complete, a copy of a written inquiry that has been sent to the purchaser asking for the missing

EXHIBIT I

POLITICAL FILE DISCLOSURE FORM FOR *NON-CANDIDATE* TIME PURCHASE REQUESTS RELATING TO A POLITICAL MATTER OF NATIONAL IMPORTANCE

(to be completed in full at the time of the initial purchase request and supplemented as necessary--
for example, if the purchaser should provide multiple spots with different reportable content)

Request was: [X] Accepted **O** Rejected

Check one: [X] Original Form **O** Supplement to Form (Date: _____)

Station: WRTV
Date of purchase request: 4/19/18
Responsible Station employee: Jennifer Hyslop

Agency: Red Eagle Media
Contact person: Melissa Sharp
Address: 815 Slaters Lane, Alexandria VA 22314
Phone #: 703-683-4877

List **all** issues of national importance referenced *in the spot covered by this form* (if none, state "None"): None

List **all** candidates referenced **and** the office that that candidate is seeking—whether or not the office is mentioned in the spot (if none, state "None"): Steve Braun (US CONGRESS)

List every Federal election referenced in the spot (if none, state "None"): None

---

Sponsor (full name): With Honor Fund
Address: PO Box 1843. Alexandria, VA 22313
Phone #: not listed; www.withhonor.org
Contact person (if different from Agency contact):

List of the Sponsor's chief executive officers or members of its executive committee or members of its board of directors*:

John Mahoney – COO
Rye Barcott – Co-Founder & CEO

EXHIBIT J

NAB Form PB-18 Issues

AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Station and Location:	Date:
KCAV, Springfield, MO	9-7-18

I, Red Eagle Media Group
do hereby request station time concerning the following issue:

National Rifle Association Political Victory Fund

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

This broadcast time will be used by: NRA-PVF

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

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):

Missouri General Election US Senate

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

11250 Waples Mill Road
Fairfax, VA 22030

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):

Robert G. Owens - Treasurer

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

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

NAB Form PB-18 Issues

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)

09/6/18		
Date	Signature	Contact Phone Number

TO BE SIGNED BY STATION REPRESENTATIVE

☑ Accepted	☐ Accepted in Part	☐ Rejected
Natalie Murphy	Natalie Murphy	NRSM
Signature	Printed Name	Title

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

EXHIBIT K

POLITICAL FILE DISCLOSURE FORM FOR *NON-CANDIDATE* TIME PURCHASE REQUESTS RELATING TO A POLITICAL MATTER OF NATIONAL IMPORTANCE
(to be completed in full at the time of the initial purchase request and supplemented as necessary--for example, if the purchaser should provide multiple spots with different reportable content)

Request was: [X] Accepted O Rejected

Check one: [X] Original Form O Supplement to Form (Date: _____)

Station: KSHB
Date of purchase request: 9/19/18
Responsible Station employee: Mike Wang

Agency: Red Eagle Media Group
Contact person: Kristy Kovatch
Address: 815 Slaters Lane, Alexandria, VA 22314
Phone #: 202-872-1155

List **all** issues of national importance referenced *in the spot covered by this form* (if none, state "None"): Missouri senate, gun rights, supreme court

List **all** candidates referenced **and** the office that that candidate is seeking—whether or not the office is mentioned in the spot (if none, state "None"):

Claire McCaskill, Josh Hawley, senate

List every Federal election referenced in the spot (if none, state "None"): senate

---

Sponsor (full name): National Rifle Association-Political Victory Fund
Address: 11250 Waples Mill Road, Fairfax, VA 22030
Phone #: 800-672-3888; https://contact.nra.org/contact-us.aspx
Contact person (if different from Agency contact):

List of the Sponsor's chief executive officers or members of its executive committee or members of its board of directors: Robert G. Owens- Treasurer; Chris Cox, Chairman

EXHIBIT L

ORDER

Kansas City

Orders	**Order / Rev:**	**897523**		
	Alt Order #:	09195622		
	Product Desc:	HAWLEY FOR SENATE		
	Estimate:	9875		
	Flight Dates:	10/23/18 - 10/29/18	Primary AE:	Ben Stecker
	Original Date / Rev:	08/15/18 / 08/15/18	Sales Office:	T-WAS
	Order Type:	GENERAL	Sales Region:	National
Agency	**Name:**	**American Media & Advocacy Group**		
	Buying Contact:		Billing Type:	Cash
	Billing Contact:		Billing Calendar:	Broadcast
		815 Slaters Lane	Billing Cycle:	EOM/EOC
		Alexandria, VA 22314	Agency Commission:	15%
Advertiser	**Name:**	**Josh Hawley For Senate**		
	Demographic:	A35+	New Business Thru:	
	Product Codes:	Political-Cand-Senate	Order Separation:	00:15:00
	Priority:	IMP	Advertiser External ID:	
	Revenue Code 1:	POL	Agency External ID:	
	Revenue Code 2:	PLC	Unit Code:	General
	Revenue Code 3:	SPL		

Bill Plan

Start Date	End Date	# Spots	Gross Amount	Net Amount
10/01/18	10/28/18	51	$77,630.00	$65,985.50
10/29/18	10/29/18	10	$6,660.00	$5,661.00

Totals

Month	# Spots	Gross Amount	Net Amount	Rating
October 2018	51	$77,630.00	$65,985.50	0.00
November 2018	10	$6,660.00	$5,661.00	0.00
Totals	61	$84,290.00	$71,646.50	0.00

Account Executives

Account Executive	Sales Office	Sales Region	Start Date / End Date	Order %
Ben Stecker			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	KCTV	10/29/18	10/29/18	News @ 5am More in the Morning	CM	5a-6a	1------	:30	1	$200.00	PMT	0.00 NM	1	$200.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/29/18	11/04/18	1------	1	$200.00	0.00								
N 2	KCTV	10/24/18	10/24/18	Better KC/Better TV M-F 9-10am	CM	9-10am	--1----	:30	1	$250.00	PMT	0.00 NM	1	$250.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	--1----	1	$250.00	0.00								
N 3	KCTV	10/25/18	10/25/18	Better KC/Better TV M-F 9-10am	CM	9-10am	---1---	:30	1	$250.00	PMT	0.00 NM	1	$250.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	---1---	1	$250.00	0.00								
N 4	KCTV	10/26/18	10/26/18	Better KC/Better TV M-F 9-10am	CM	9-10am	----1--	:30	1	$250.00	PMT	0.00 NM	1	$250.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	----1--	1	$250.00	0.00								
N 5	KCTV	10/29/18	10/29/18	KCTV5 News 4pm News @ 4pm	CM	4-5pm	1------	:30	1	$450.00	PMT	0.00 NM	1	$450.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/29/18	11/04/18	1------	1	$450.00	0.00								

Order / Rev: 897523
Alt Order #: 09195622
Flight Dates: 10/23/18 - 10/29/18

Advertiser: Josh Hawley For Senate
Product Desc: HAWLEY FOR SENATE
Estimate: 9875

Kansas City

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg Type	Spots	Amount
N 6	KCTV	10/23/18	10/23/18	KCTV5 News 4pm News @ 4pm	CM	4-5pm	-1-----	:30	1	$450.00	PMT	0.00 NM	1	$450.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	-1-----	1	$450.00	0.00								
N 7	KCTV	10/24/18	10/24/18	KCTV5 News 4pm News @ 4pm	CM	4-5pm	--1----	:30	1	$450.00	PMT	0.00 NM	1	$450.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	--1----	1	$450.00	0.00								
N 8	KCTV	10/25/18	10/25/18	KCTV5 News 4pm News @ 4pm	CM	4-5pm	---1---	:30	1	$450.00	PMT	0.00 NM	1	$450.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	---1---	1	$450.00	0.00								
N 9	KCTV	10/26/18	10/26/18	KCTV5 News 4pm News @ 4pm	CM	4-5pm	----1--	:30	1	$450.00	PMT	0.00 NM	1	$450.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	----1--	1	$450.00	0.00								
N 10	KCTV	10/29/18	10/29/18	KCTV5 News 5pm News @ 5pm	CM	5-530pm	1------	:30	1	$550.00	PMT	0.00 NM	1	$550.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/29/18	11/04/18	1------	1	$550.00	0.00								
N 11	KCTV	10/23/18	10/23/18	KCTV5 News 5pm News @ 5pm	CM	5-530pm	-1-----	:30	1	$550.00	PMT	0.00 NM	1	$550.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	-1-----	1	$550.00	0.00								
N 12	KCTV	10/23/18	10/23/18	News @ 5am More in the Morning	CM	5a-6a	-1-----	:30	1	$200.00	PMT	0.00 NM	1	$200.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	-1-----	1	$200.00	0.00								
N 13	KCTV	10/24/18	10/24/18	KCTV5 News 5pm News @ 5pm	CM	5-530pm	--1----	:30	1	$550.00	PMT	0.00 NM	1	$550.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	--1----	1	$550.00	0.00								
N 14	KCTV	10/25/18	10/25/18	KCTV5 News 5pm News @ 5pm	CM	5-530pm	---1---	:30	1	$550.00	PMT	0.00 NM	1	$550.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	---1---	1	$550.00	0.00								
N 15	KCTV	10/26/18	10/26/18	KCTV5 News 5pm News @ 5pm	CM	5-530pm	----1--	:30	1	$550.00	PMT	0.00 NM	1	$550.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	----1--	1	$550.00	0.00								
N 16	KCTV	10/29/18	10/29/18	CBS Evening News M-FCM CBS Evening News		530-6pm	1------	:30	1	$700.00	PMT	0.00 NM	1	$700.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/29/18	11/04/18	1------	1	$700.00	0.00								
N 17	KCTV	10/23/18	10/23/18	CBS Evening News M-FCM CBS Evening News		530-6pm	-1-----	:30	1	$700.00	PMT	0.00 NM	1	$700.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	-1-----	1	$700.00	0.00								
N 18	KCTV	10/24/18	10/24/18	CBS Evening News M-FCM CBS Evening News		530-6pm	--1----	:30	1	$700.00	PMT	0.00 NM	1	$700.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	--1----	1	$700.00	0.00								
N 19	KCTV	10/25/18	10/25/18	CBS Evening News M-FCM CBS Evening News		530-6pm	---1---	:30	1	$700.00	PMT	0.00 NM	1	$700.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/22/18	10/28/18	---1---	1	$700.00	0.00								
N 20	KCTV	10/26/18	10/26/18	CBS Evening News M-FCM CBS Evening News		530-6pm	----1--	:30	1	$700.00	PMT	0.00 NM	1	$700.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								

Order / Rev: 897523
Alt Order #: 09195622
Flight Dates: 10/23/18 - 10/29/18

Advertiser: Josh Hawley For Senate
Product Desc: HAWLEY FOR SENATE
Estimate: 9875

Kansas City

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg Type	Spots	Amount
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	----1--	1	$700.00	0.00							
N21	KCTV	10/29/18	10/29/18	KCTV5 News 6pm News @ 6pm	CM	6-630pm	1------	:30	1	$700.00	PMT	0.00 NM	1	$700.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/29/18	11/04/18	1------	1	$700.00	0.00							
N22	KCTV	10/23/18	10/23/18	KCTV5 News 6pm News @ 6pm	CM	6-630pm	-1-----	:30	1	$700.00	PMT	0.00 NM	1	$700.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	-1-----	1	$700.00	0.00							
N23	KCTV	10/24/18	10/24/18	News @ 5am More in the Morning	CM	5a-6a	--1----	:30	1	$200.00	PMT	0.00 NM	1	$200.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	--1----	1	$200.00	0.00							
N24	KCTV	10/24/18	10/24/18	KCTV5 News 6pm News @ 6pm	CM	6-630pm	--1----	:30	1	$700.00	PMT	0.00 NM	1	$700.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	--1----	1	$700.00	0.00							
N25	KCTV	10/25/18	10/25/18	KCTV5 News 6pm News @ 6pm	CM	6-630pm	---1---	:30	1	$700.00	PMT	0.00 NM	1	$700.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	---1---	1	$700.00	0.00							
N26	KCTV	10/26/18	10/26/18	KCTV5 News 6pm News @ 6pm	CM	6-630pm	----1--	:30	1	$700.00	PMT	0.00 NM	1	$700.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	----1--	1	$700.00	0.00							
N27	KCTV	10/27/18	10/27/18	KCTV5 SA News 6p KCTV5 SA News 6pm	CM	6-7pm	-----1-	:30	1	$500.00	PMT	0.00 NM	1	$500.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	-----1-	1	$500.00	0.00							
N28	KCTV	10/28/18	10/28/18	KCTV5 SU News 530pm KCTV5 SU News 530p	CM	530-6p	------1	:30	1	$500.00	PMT	0.00 NM	1	$500.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	------1	1	$500.00	0.00							
N29	KCTV	10/29/18	10/29/18	M-F 630-7pm M-F 630-7pm	CM	630-7pm	1------	:30	1	$900.00	PMT	0.00 NM	1	$900.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/29/18	11/04/18	1------	1	$900.00	0.00							
N30	KCTV	10/23/18	10/23/18	M-F 630-7pm M-F 630-7pm	CM	630-7pm	-1-----	:30	1	$900.00	PMT	0.00 NM	1	$900.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	-1-----	1	$900.00	0.00							
N31	KCTV	10/24/18	10/24/18	M-F 630-7pm M-F 630-7pm	CM	630-7pm	--1----	:30	1	$900.00	PMT	0.00 NM	1	$900.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	--1----	1	$900.00	0.00							
N32	KCTV	10/25/18	10/25/18	M-F 630-7pm M-F 630-7pm	CM	630-7pm	---1---	:30	1	$900.00	PMT	0.00 NM	1	$900.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	---1---	1	$900.00	0.00							
N33	KCTV	10/26/18	10/26/18	M-F 630-7pm M-F 630-7pm	CM	630-7pm	----1--	:30	1	$900.00	PMT	0.00 NM	1	$900.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	----1--	1	$900.00	0.00							
N34	KCTV	10/25/18	10/25/18	News @ 5am More in the Morning	CM	5a-6a	---1---	:30	1	$200.00	PMT	0.00 NM	1	$200.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	---1---	1	$200.00	0.00							
N35	KCTV	10/29/18	10/29/18		CM	7-8pm		:30	1	$1,800.00	PMT	0.00 NM	1	$1,800.00

Order / Rev: 897523
Alt Order #: 09195622
Flight Dates: 10/23/18 - 10/29/18

Advertiser: Josh Hawley For Senate
Product Desc: HAWLEY FOR SENATE
Estimate: 9875

Kansas City

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg Type	Spots	Amount
				Mon 7-8pm Mon 7-8pm			1------							
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/29/18	11/04/18	1------	1	$1,800.00	0.00							
N36	KCTV	10/24/18	10/24/18	Wed 7-8pm Wed 7-8pm	CM	7-8pm	--1----	:30	1	$3,800.00	PMT	0.00 NM	1	$3,800.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	--1----	1	$3,800.00	0.00							
N37	KCTV	10/24/18	10/24/18	Wed 8-9pm Wed 8-9pm	CM	8-9pm	--1----	:30	1	$2,600.00	PMT	0.00 NM	1	$2,600.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	--1----	1	$2,600.00	0.00							
N38	KCTV	10/24/18	10/24/18	Wed 9-10pm Wed 9-10pm	CM	9-10pm	--1----	:30	1	$2,400.00	PMT	0.00 NM	1	$2,400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	--1----	1	$2,400.00	0.00							
N39	KCTV	10/25/18	10/25/18	Thu 8-9pm Thu 8-9pm	CM	8-9pm	---1---	:30	1	$3,200.00	PMT	0.00 NM	1	$3,200.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	---1---	1	$3,200.00	0.00							
N40	KCTV	10/26/18	10/26/18	Fri 8-9pm Fri 8-9pm	CM	8-9pm	----1--	:30	1	$1,800.00	PMT	0.00 NM	1	$1,800.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	----1--	1	$1,800.00	0.00							
N41	KCTV	10/28/18	10/28/18	Sun 6-7pm Sun 6-7pm	CM	6-7pm	------1	:30	1	$6,400.00	PMT	0.00 NM	1	$6,400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	------1	1	$6,400.00	0.00							
N42	KCTV	10/28/18	10/28/18	Sun 8-9pm Sun 8-9pm	CM	Sun 8-9pm	------1	:30	1	$2,200.00	PMT	0.00 NM	1	$2,200.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	------1	1	$2,200.00	0.00							
N43	KCTV	10/29/18	10/29/18	News @ 10pm KCTV5 News @ 10P	CM	10-1035pm	1------	:30	1	$650.00	PMT	0.00 NM	1	$650.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/29/18	11/04/18	1------	1	$650.00	0.00							
N44	KCTV	10/23/18	10/23/18	News @ 10pm KCTV5 News @ 10P	CM	10-1035pm	-1-----	:30	1	$650.00	PMT	0.00 NM	1	$650.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	-1-----	1	$650.00	0.00							
N45	KCTV	10/26/18	10/26/18	News @ 5am More in the Morning	CM	5a-6a	----1--	:30	1	$200.00	PMT	0.00 NM	1	$200.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	----1--	1	$200.00	0.00							
N46	KCTV	10/24/18	10/24/18	News @ 10pm KCTV5 News @ 10P	CM	10-1035pm	--1----	:30	1	$650.00	PMT	0.00 NM	1	$650.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	--1----	1	$650.00	0.00							
N47	KCTV	10/25/18	10/25/18	News @ 10pm KCTV5 News @ 10P	CM	10-1035pm	---1---	:30	1	$650.00	PMT	0.00 NM	1	$650.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	---1---	1	$650.00	0.00							
N48	KCTV	10/26/18	10/26/18	News @ 10pm KCTV5 News @ 10P	CM	10-1035pm	----1--	:30	1	$650.00	PMT	0.00 NM	1	$650.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	----1--	1	$650.00	0.00							
N49	KCTV	10/27/18	10/27/18	Sat News @ 10pm KCTV5 News @ 10P Sat	CM	10-1035pm	-----1-	:30	1	$650.00	PMT	0.00 NM	1	$650.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							

Order / Rev: 897523
Alt Order #: 09195622
Flight Dates: 10/23/18 - 10/29/18

Advertiser: Josh Hawley For Senate
Product Desc: HAWLEY FOR SENATE
Estimate: 9875

Kansas City

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg Type	Spots	Amount
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	-----1-	1	$650.00	0.00							
N50	KCTV	10/28/18	10/28/18	Sun News @ 10pm	CM	10-1035pm	------1	:30	1	$650.00	PMT	0.00 NM	1	$650.00
				KCTV5 News @ 10P Sun										
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	------1	1	$650.00	0.00							
N51	KCTV	10/29/18	10/29/18	M-F 1035-1135P	CM	1035-1135P	1------	:30	1	$460.00	PMT	0.00 NM	1	$460.00
				M-F 1035-1135P										
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/29/18	11/04/18	1------	1	$460.00	0.00							
N52	KCTV	10/23/18	10/23/18	M-F 1035-1135P	CM	1035-1135P	-1-----	:30	1	$460.00	PMT	0.00 NM	1	$460.00
				M-F 1035-1135P										
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	-1-----	1	$460.00	0.00							
N53	KCTV	10/25/18	10/25/18	M-F 1035-1135P	CM	1035-1135P	---1---	:30	1	$460.00	PMT	0.00 NM	1	$460.00
				10:35 PM-11:35 PM		(10:35 PM-11:35 PM)								
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	---1---	1	$460.00	0.00							
N54	KCTV	10/26/18	10/26/18	M-F 1035-1135P	CM	1035-1135P	----1--	:30	1	$460.00	PMT	0.00 NM	1	$460.00
				M-F 1035-1135P										
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	----1--	1	$460.00	0.00							
N55	KCTV	10/28/18	10/28/18	1035p-11p	CM	10:35p-11p	------1	:30	1	$600.00	PMT	0.00 NM	1	$600.00
				10:35 PM-11:00 PM		(10:35 PM-11:00 PM)								
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	------1	1	$600.00	0.00							
N56	KCTV	10/27/18	10/27/18	KCTV5 Local News 8-10a	CM	8-10a	-----1-	:30	1	$250.00	PMT	0.00 NM	1	$250.00
				KCTV5 Local News 8-10a										
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	-----1-	1	$250.00	0.00							
N57	KCTV	10/27/18	10/27/18	M-SU Prime Rotator	CM	M-Sa 7-10pm/Su 6	-----1-	:30	1	$800.00	PMT	0.00 NM	1	$800.00
				M-Su Prime Rotator										
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	-----1-	1	$800.00	0.00							
N58	KCTV	10/28/18	10/28/18	NFL*Chiefs Reg Season	CM	Various	------1	:30	1	$32,000.00	PMT	0.00 NM	1	$32,000.00
				12:00 PM-3:00 PM		(12:00 PM-3:00 PM)								
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	------1	1	$32,000.00	0.00							
N59	KCTV	10/28/18	10/28/18	Sun AM News	CM	930-1130am	------1	:30	1	$300.00	PMT	0.00 NM	1	$300.00
				Sun AM News										
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	------1	1	$300.00	0.00							
N60	KCTV	10/29/18	10/29/18	Better KC/Better TV	CM	9-10am	1------	:30	1	$250.00	PMT	0.00 NM	1	$250.00
				M-F 9-10am										
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/29/18	11/04/18	1------	1	$250.00	0.00							
N61	KCTV	10/23/18	10/23/18	Better KC/Better TV	CM	9-10am	-1-----	:30	1	$250.00	PMT	0.00 NM	1	$250.00
				M-F 9-10am										
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/22/18	10/28/18	-1-----	1	$250.00	0.00							
												Totals	61	$84,290.00

EXHIBIT M

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

Red Eagle Media Group
815 Slaters Ln
Alexandria, VA 22314

Contract # 3327500

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (122842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Oneill
CO-OP	No
Headline #	ECR26004938
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$5,148.75
Net Total	$29,176.25
Sales Tax	

KECI+KCFW Combo (KECI+KCFW)

By Broadcast Month	Spots	Rate
May. 2018	93	$34,325.00
Grand Total:	93	$34,325.00

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 / SPOT	05/05/18-05/05/18	1	:30	10A- 5P (MST)	3						X		3	$125.00	$375.00	KECI+KCFW Combo (KECI+KCFW	NHL Playoffs Day	5/2/18
2.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	10A- 5P (MST)	3							X	3	$125.00	$375.00	KECI+KCFW Combo (KECI+KCFW	NHL Playoffs Day	5/2/18
3.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	2:30P- 3P (MST)	1				X				1	$160.00	$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY B	5/2/18
4.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	2:30P- 3P (MST)	1					X			1	$160.00	$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY B	5/2/18
5.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30	2:30P- 3P (MST)	1	X							1	$160.00	$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY B	5/2/18
6.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	2:30P- 3P (MST)	1		X						1	$160.00	$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY B	5/2/18
7.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	2:30P- 3P (MST)	1			X					1	$160.00	$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY B	5/2/18
8.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	2P- 2:30P (MST)	1				X				1	$160.00	$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY	5/2/18
9.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	2P- 2:30P (MST)	1					X			1	$160.00	$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY	5/2/18
10.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30	2P- 2:30P (MST)	1	X							1	$160.00	$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY	5/2/18
11.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	2P- 2:30P (MST)	1		X						1	$160.00	$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY	5/2/18
12.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	2P- 2:30P (MST)	1			X					1	$160.00	$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY	5/2/18
13.0	Normal Line / Hockey	05/05/18-05/05/18	2	:30	5P- 8P (MST)	2						X		2	$175.00	$350.00	KECI+KCFW Combo (KECI+KCFW	NHL Playoffs Prime 7e/6c	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

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

B/E Bookend P/B Piggy Back

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

Red Eagle Media Group
815 Slaters Ln
Alexandria, VA 22314

Contract # 3327500

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (122842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Oneill
CO-OP	No
Headline #	ECR2600493B
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$5,148.75
Net Total	$29,176.25
Sales Tax	

KECI+KCFW Combo (KECI+KCFW)

By Broadcast Month	Spots	Rate
May, 2018	93	$34,325.00
Grand Total:	93	$34,325.00

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 / SPOT	05/05/18-05/05/18	2	:30	7A- 8A (MST)	1						X		1	$200.00	$200.00	KECI+KCFW Combo (KECI+KCFW	SATURDAY TODAY/AVG. ALL WKS	5/2/18
15.0	Normal Line / SPOT	05/03/18-05/03/18	2	:30	4P- 5P (MST)	1				X				1	$220.00	$220.00	KECI+KCFW Combo (KECI+KCFW	ELLEN	5/2/18
16.0	Normal Line / SPOT	05/04/18-05/04/18	2	:30	4P- 5P (MST)	1					X			1	$220.00	$220.00	KECI+KCFW Combo (KECI+KCFW	ELLEN	5/2/18
17.0	Normal Line / SPOT	05/07/18-05/07/18	2	:30	4P- 5P (MST)	1	X							1	$220.00	$220.00	KECI+KCFW Combo (KECI+KCFW	ELLEN	5/2/18
18.0	Normal Line / SPOT	05/08/18-05/08/18	2	:30	4P- 5P (MST)	1		X						1	$220.00	$220.00	KECI+KCFW Combo (KECI+KCFW	ELLEN	5/2/18
19.0	Normal Line / SPOT	05/09/18-05/09/18	2	:30	4P- 5P (MST)	1			X					1	$220.00	$220.00	KECI+KCFW Combo (KECI+KCFW	ELLEN	5/2/18
20.0	Normal Line / SPOT	05/05/18-05/05/18	2	:30	4:30P- 5:15P (MST)	1						X		1	$275.00	$275.00	KECI+KCFW Combo (KECI+KCFW	KENTUCKY DERBY	5/2/18
21.0	Normal Line / SPOT	05/06/18-05/06/18	2	:30	10:30P- 11P (MST)	1							X	1	$280.00	$280.00	KECI+KCFW Combo (KECI+KCFW	FULL MEASURE	5/2/18
22.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	10:35P- 11:35P (MST)	1				X				1	$290.00	$290.00	KECI+KCFW Combo (KECI+KCFW	TONITE SHW-NBC	5/2/18
23.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	10:35P- 11:35P (MST)	1					X			1	$290.00	$290.00	KECI+KCFW Combo (KECI+KCFW	TONITE SHW-NBC	5/2/18
24.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30	10:35P- 11:35P (MST)	1	X							1	$290.00	$290.00	KECI+KCFW Combo (KECI+KCFW	TONITE SHW-NBC	5/2/18
25.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	10:35P- 11:35P (MST)	1		X						1	$290.00	$290.00	KECI+KCFW Combo (KECI+KCFW	TONITE SHW-NBC	5/2/18
26.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	10:35P- 11:35P (MST)	1			X					1	$290.00	$290.00	KECI+KCFW Combo (KECI+KCFW	TONITE SHW-NBC	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

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

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

Red Eagle Media Group
815 Slaters Ln
Alexandria, VA 22314

Contract # **3327500**

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (122842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Oneill
CO-OP	No
Headline #	ECR26004938
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$5,148.75
Net Total	$29,176.25
Sales Tax	

KECI+KCFW Combo (KECI+KCFW)

By Broadcast Month	Spots	Rate
May. 2018	93	$34,325.00
Grand Total:	93	$34,325.00

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
27.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	9A- 10A (MST)	2							X	2	$290.00	$580.00	KECI+KCFW Combo (KECI+KCFW	MEET PRESS-SUN	5/2/18
28.0	Normal Line / News	05/03/18-05/03/18	1	:30	6:30A- 7A (MST)	1				X				1	$290.00	$290.00	KECI+KCFW Combo (KECI+KCFW	MONTANA TODAY3	5/2/18
29.0	Normal Line / News	05/04/18-05/04/18	1	:30	6:30A- 7A (MST)	1					X			1	$290.00	$290.00	KECI+KCFW Combo (KECI+KCFW	MONTANA TODAY3	5/2/18
30.0	Normal Line / News	05/07/18-05/07/18	1	:30	6:30A- 7A (MST)	1	X							1	$290.00	$290.00	KECI+KCFW Combo (KECI+KCFW	MONTANA TODAY3	5/2/18
31.0	Normal Line / News	05/08/18-05/08/18	1	:30	6:30A- 7A (MST)	1		X						1	$290.00	$290.00	KECI+KCFW Combo (KECI+KCFW	MONTANA TODAY3	5/2/18
32.0	Normal Line / News	05/09/18-05/09/18	1	:30	6:30A- 7A (MST)	1			X					1	$290.00	$290.00	KECI+KCFW Combo (KECI+KCFW	MONTANA TODAY3	5/2/18
33.0	Normal Line / News	05/05/18-05/05/18	1	:30	5P- 5:30P (MST)	1						X		1	$300.00	$300.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 5 - SA	5/2/18
34.0	Normal Line / News	05/03/18-05/03/18	1	:30	8A- 9A (MST)	2				X				2	$340.00	$680.00	KECI+KCFW Combo (KECI+KCFW	TODAY SHW<	5/2/18
35.0	Normal Line / News	05/04/18-05/04/18	1	:30	8A- 9A (MST)	2					X			2	$340.00	$680.00	KECI+KCFW Combo (KECI+KCFW	TODAY SHW<	5/2/18
36.0	Normal Line / News	05/07/18-05/07/18	1	:30	8A- 9A (MST)	2	X							2	$340.00	$680.00	KECI+KCFW Combo (KECI+KCFW	TODAY SHW<	5/2/18
37.0	Normal Line / News	05/08/18-05/08/18	1	:30	8A- 9A (MST)	2		X						2	$340.00	$680.00	KECI+KCFW Combo (KECI+KCFW	TODAY SHW<	5/2/18
38.0	Normal Line / News	05/09/18-05/09/18	1	:30	8A- 9A (MST)	2			X					2	$340.00	$680.00	KECI+KCFW Combo (KECI+KCFW	TODAY SHW<	5/2/18
39.0	Normal Line / News	05/03/18-05/03/18	1	:30	7A- 8A (MST)	2				X				2	$340.00	$680.00	KECI+KCFW Combo (KECI+KCFW	TODAY SHW<	5/2/18
40.0	Normal Line / News	05/04/18-05/04/18	1	:30	7A- 8A (MST)	2					X			2	$340.00	$680.00	KECI+KCFW Combo (KECI+KCFW	TODAY SHW<	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

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

B/E Bookend P/B Piggy Back

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

Red Eagle Media Group
815 Slaters Ln
Alexandria, VA 22314

Contract # 3327500

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (122842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Oneill
CO-OP	No
Headline #	ECR26004938
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$5,148.75
Net Total	$29,176.25
Sales Tax	

KECI+KCFW Combo (KECI+KCFW)

By Broadcast Month	Spots	Rate
May. 2018	93	$34,325.00
Grand Total:	93	$34,325.00

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
41.0	Normal Line / News	05/07/18-05/07/18	1	:30	7A- 8A (MST)	2	X							2	$340.00	$680.00	KECI+KCFW Combo (KECI+KCFW	TODAY SHW<	5/2/18
42.0	Normal Line / News	05/08/18-05/08/18	1	:30	7A- 8A (MST)	2		X						2	$340.00	$680.00	KECI+KCFW Combo (KECI+KCFW	TODAY SHW<	5/2/18
43.0	Normal Line / News	05/09/18-05/09/18	1	:30	7A- 8A (MST)	2			X					2	$340.00	$680.00	KECI+KCFW Combo (KECI+KCFW	TODAY SHW<	5/2/18
44.0	Normal Line / SPOT	05/05/18-05/05/18	1	:30	9:30P- 11P (MST)	1						X		1	$400.00	$400.00	KECI+KCFW Combo (KECI+KCFW	SAT NITE LIVE	5/2/18
45.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	7P- 8P (MST)	2					X			2	$400.00	$800.00	KECI+KCFW Combo (KECI+KCFW	BLINDSPOT	5/2/18
46.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	8P- 9P (MST)	2					X			2	$400.00	$800.00	KECI+KCFW Combo (KECI+KCFW	TAKEN	5/2/18
47.0	Normal Line / News	05/05/18-05/05/18	1	:30	10P- 10:30P (MST)	1						X		1	$410.00	$410.00	KECI+KCFW Combo (KECI+KCFW	SAT NITE LIVE	5/2/18
48.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	9P- 10P (MST)	2					X			2	$440.00	$880.00	KECI+KCFW Combo (KECI+KCFW	DATELNE FR-NBC	5/2/18
49.0	Normal Line / News	05/03/18-05/03/18	1	:30	5P- 5:30P (MST)	1				X				1	$460.00	$460.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 5	5/2/18
50.0	Normal Line / News	05/04/18-05/04/18	1	:30	5P- 5:30P (MST)	1					X			1	$460.00	$460.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 5	5/2/18
51.0	Normal Line / News	05/07/18-05/07/18	1	:30	5P- 5:30P (MST)	1	X							1	$460.00	$460.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 5	5/2/18
52.0	Normal Line / News	05/08/18-05/08/18	1	:30	5P- 5:30P (MST)	1		X						1	$460.00	$460.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 5	5/2/18
53.0	Normal Line / News	05/09/18-05/09/18	1	:30	5P- 5:30P (MST)	1			X					1	$460.00	$460.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 5	5/2/18
54.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	8P- 9P (MST)	1			X					1	$460.00	$460.00	KECI+KCFW Combo (KECI+KCFW	LAW AND ORDER	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

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

B/E Bookend P/B Piggy Back

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

Red Eagle Media Group
815 Slaters Ln
Alexandria, VA 22314

Contract # 3327500

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (122842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Onelli
CO-OP	No
Headline #	ECR26004938
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$5,148.75
Net Total	$29,176.25
Sales Tax	

KECI+KCFW Combo (KECI+KCFW)

By Broadcast Month	Spots	Rate
May. 2018	93	$34,325.00
Grand Total:	93	$34,325.00

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
55.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	9P- 10P (MST)	1							X	1	$500.00	$500.00	KECI+KCFW Combo (KECI+KCFW	TIMELESS	5/2/18
56.0	Normal Line / News	05/03/18-05/03/18	1	:30	6P- 6:30P (MST)	1				X				1	$540.00	$540.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 6	5/2/18
57.0	Normal Line / News	05/04/18-05/04/18	1	:30	6P- 6:30P (MST)	1					X			1	$540.00	$540.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 6	5/2/18
58.0	Normal Line / News	05/07/18-05/07/18	1	:30	6P- 6:30P (MST)	1	X							1	$540.00	$540.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 6	5/2/18
59.0	Normal Line / News	05/08/18-05/08/18	1	:30	6P- 6:30P (MST)	1		X						1	$540.00	$540.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 6	5/2/18
60.0	Normal Line / News	05/09/18-05/09/18	1	:30	6P- 6:30P (MST)	1			X					1	$540.00	$540.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 6	5/2/18
61.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	7P- 8P (MST)	2			X					2	$560.00	$1,120.00	KECI+KCFW Combo (KECI+KCFW	BLACKLIST-NBC	5/2/18
62.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	9P- 10P (MST)	2				X				2	$580.00	$1,160.00	KECI+KCFW Combo (KECI+KCFW	CHICAGO FIRE	5/2/18
63.0	Normal Line / News	05/03/18-05/03/18	1	:30	10P- 10:35P (MST)	1				X				1	$660.00	$660.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 10	5/2/18
64.0	Normal Line / News	05/04/18-05/04/18	1	:30	10P- 10:35P (MST)	1					X			1	$660.00	$660.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 10	5/2/18
65.0	Normal Line / News	05/07/18-05/07/18	1	:30	10P- 10:35P (MST)	1	X							1	$660.00	$660.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 10	5/2/18
66.0	Normal Line / News	05/08/18-05/08/18	1	:30	10P- 10:35P (MST)	1		X						1	$660.00	$660.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 10	5/2/18
67.0	Normal Line / News	05/09/18-05/09/18	1	:30	10P- 10:35P (MST)	1			X					1	$660.00	$660.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 10	5/2/18
68.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	8P- 9P (MST)	1		X						1	$840.00	$840.00	KECI+KCFW Combo (KECI+KCFW	RISE	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

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

B/E Bookend P/B Piggy Back

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

Red Eagle Media Group
815 Slalers Ln
Alexandria, VA 22314

Contract # 3327500

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (122842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Oneill
CO-OP	No
Headline #	ECR26004938
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$5,148.75
Net Total	$29,176.25
Sales Tax	

KECI+KCFW Combo (KECI+KCFW)

By Broadcast Month	Spots	Rate
May, 2018	93	$34,325.00
Grand Total:	93	$34,325.00

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
69.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	7P-8P (MST)	2		X						2	$860.00	$1,720.00	KECI+KCFW Combo (KECI+KCFW	VOICE-TUE-NBC	5/2/18
70.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30	7P-9P (MST)	2	X							2	$900.00	$1,800.00	KECI+KCFW Combo (KECI+KCFW	VOICE-NBC	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

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

B/E Bookend P/B Piggy Back

KATZ TELEVISION GROUP

125 West 55th St
New York, NY 10019

Contract # 26004938 | Changes as of: 5/2/2018 at 9:15 AM | Version: Original Order

CPE: 622/1149/9355 | Flight: 5/3/18 - 5/9/18 | Station: KECI | Con Type: POLITICAL/VOTE

Agency: RED EAGLE MEDIA GROU
RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA VA 22314

Advertiser: America First Action | Market: Missoula | Total $: $34,325.00

Product: America First | Office: WASHINGTON | Total Spots: 93

Agency Order #: 7314717 | Service: Nielsen | Total CPP: $126.07

Buyer: Eagle Media Media Assistant, Red | Primary Demo: Adults 35-64 | Total GRP: 272.3

Salesperson: MATTHEW MULZOFF 202-955-5342 | Assistant: MATTHEW MULZOFF 202-955-5342

Separation:

Comments: Separation: 30

#	Day/Time	DP	Program	Rate	A3564 Rating	A35P Rating	Len	5/3 - 5/9							Total Spots	Total $	CPP*	GRP*
								5/3	5/4	5/5	5/6	5/7	5/8	5/9				
1	Sa-Su 10a-5p		NHL Playoffs Day	$125.00	1.6	0.5	30	0	0	3	3	0	0	0	6	$750.00	$76.22	9.8
2	Th-F,M-W 2:30p-3p		JUDGE JUDY B	$160.00	1.4	1.4	30	1	1	0	0	1	1	1	5	$800.00	$112.68	7.1
3	Th-F,M-W 2p-2:30p		JUDGE JUDY	$160.00	1.6	1.6	30	1	1	0	0	1	1	1	5	$800.00	$96.97	8.3
4	Sa 5p-8p		NHL Playoffs Prime 7e/6c	$175.00	7.2	4.0	30	0	0	2	0	0	0	0	2	$350.00	$24.20	14.5
5	Sa 7a-8a		SATURDAY TODAY/AVG. ALL WKS	$200.00	0.9	0.5	30	0	0	1	0	0	0	0	1	$200.00	$224.72	0.9
6	Th-F,M-W 4p-5p		ELLEN	$220.00	1.2	0.8	30	1	1	0	0	1	1	1	5	$1,100.00	$183.33	6.0
7	Sa 4:30p-5:15p		KENTUCKY DERBY	$275.00	36.5	6.0	30	0	0	1	0	0	0	0	1	$275.00	$7.54	36.5
8	Su 10:30p-11p		FULL MEASURE	$280.00	1.7	1.9	30	0	0	0	1	0	0	0	1	$280.00	$166.67	1.7
9	Th-F,M-W 10:35p-11:35p		TONITE SHW-NBC	$290.00	1.5	1.6	30	1	1	0	0	1	1	1	5	$1,450.00	$197.28	7.3
10	Su 9a-10a		MEET PRESS-SUN	$290.00	1.8	1.9	30	0	0	0	2	0	0	0	2	$580.00	$164.77	3.5
11	Th-F,M-W 6:30a-7a		MONTANA TODAY3	$290.00	1.9	2.2	30	1	1	0	0	1	1	1	5	$1,450.00	$152.63	9.5
12	Sa 5p-5:30p		NEWS AT 5 - SA	$300.00	3.1	4.7	30	0	0	1	0	0	0	0	1	$300.00	$97.40	3.1
13	Th-F,M-W 8a-9a		TODAY SHW<	$340.00	1.9	1.7	30	2	2	0	0	2	2	2	10	$3,400.00	$176.17	19.3
14	Th-F,M-W 7a-8a		TODAY SHW<	$340.00	2.2	1.8	30	2	2	0	0	2	2	2	10	$3,400.00	$154.55	22.0
15	Sa 9:30p-11p		SAT NITE LIVE	$400.00	6.0	5.4	30	0	0	1	0	0	0	0	1	$400.00	$66.78	6.0
16	F 7p-8p		BLINDSPOT	$400.00	2.2	2.1	30	0	2	0	0	0	0	0	2	$800.00	$182.65	4.4
17	F 8p-9p		TAKEN	$400.00	3.4	3.5	30	0	2	0	0	0	0	0	2	$800.00	$118.69	6.7
18	Sa 10p-10:30p		SAT NITE LIVE	$410.00	7.2	6.3	30	0	0	1	0	0	0	0	1	$410.00	$57.10	7.2

Printed on 05/02/2018 at 12:36 PM | * Stats based on Primary Demo

125 West 55th St
New York, NY 10019

Contract #	26004938	Changes as of:	5/2/2018 at 9:15 AM	Version:	Original Order
CPE:	622/1149/9355	Flight:	5/3/18 - 5/9/18	Station:	KECI
Agency:	RED EAGLE MEDIA GROU RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA VA 22314	Advertiser:	America First Action	Market:	Missoula
		Product:	America First	Office:	WASHINGTON
		Agency Order #:	7314717	Service:	Nielsen
		Buyer:	Eagle Media Media Assistant, Red	Primary Demo:	Adults 35-64
		Salesperson:	MATTHEW MULZOFF 202-955-5342	Assistant:	MATTHEW MULZOFF 202-955-5342
		Separation:			

Con Type:	POLITICAL/VOTE	
Total $:	$34,325.00	
Total Spots:	93	
Total CPP:	$126.07	
Total GRP:	272.3	

#	Day/Time	DP	Program	Rate	A3564 Rating	A35P Rating	Len	5/3 - 5/9							Total Spots	Total $	CPP*	GRP*
								5/3	5/4	5/5	5/6	5/7	5/8	5/9				
19	F 9p-10p		DATELNE FR-NBC	$440.00	3.0	2.9	30	0	2	0	0	0	0	0	2	$880.00	$146.67	6.0
20	Th-F,M-W 5p-5:30p		NEWS AT 5	$460.00	3.1	4.7	30	1	1	0	0	1	1	1	5	$2,300.00	$149.35	15.4
21	W 8p-9p		LAW AND ORDER	$460.00	4.9	5.1	30	0	0	0	0	0	0	1	1	$460.00	$94.26	4.9
22	Su 9p-10p		TIMELESS	$500.00	2.0	1.9	30	0	0	0	1	0	0	0	1	$500.00	$250.00	2.0
23	Th-F,M-W 6p-6:30p		NEWS AT 6	$540.00	2.5	4.1	30	1	1	0	0	1	1	1	5	$2,700.00	$215.14	12.5
24	W 7p-8p		BLACKLIST-NBC	$560.00	4.8	4.6	30	0	0	0	0	0	0	2	2	$1,120.00	$116.67	9.6
25	Th 9p-10p		CHICAGO FIRE	$580.00	2.5	3.6	30	2	0	0	0	0	0	0	2	$1,160.00	$232.00	5.0
26	Th-F,M-W 10p-10:35p		NEWS AT 10	$660.00	3.7	5.7	30	1	1	0	0	1	1	1	5	$3,300.00	$176.94	18.6
27	Tu 8p-9p		RISE	$840.00	4.9	4.9	30	0	0	0	0	0	1	0	1	$840.00	$171.08	4.9
28	Tu 7p-8p		VOICE-TUE-NBC	$860.00	4.1	4.4	30	0	0	0	0	0	2	0	2	$1,720.00	$210.27	8.2
29	M 7p-9p		VOICE-NBC	$900.00	5.7	5.9	30	0	0	0	0	2	0	0	2	$1,800.00	$158.45	11.4
							TOTALS:	14	18	10	7	14	15	15	93	$34,325.00	$126.07	272.3

Printed on 05/02/2018 at 12:36 PM | * Stats based on Primary Demo

125 West 55th St
New York, NY 10019

Contract #	26004938	Changes as of:	5/2/2018 at 9:15 AM	Version:	Original Order
CPE:	622/1149/9355	Flight:	5/3/18 - 5/9/18	Station:	KECI
Agency:	RED EAGLE MEDIA GROU	Advertiser:	America First Action	Market:	Missoula
	RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA VA 22314	Product:	America First	Office:	WASHINGTON
		Agency Order #:	7314717	Service:	Nielsen
		Buyer:	Eagle Media Media Assistant, Red	Primary Demo:	Adults 35-64
		Salesperson:	MATTHEW MULZOFF 202-955-5342	Assistant:	MATTHEW MULZOFF 202-955-5342
		Separation:			

Con Type:	POLITICAL/VOTE		
Total $:	$34,325.00		
Total Spots:	93		
Total CPP:	$126.07		
Total GRP:	272.3		

Special Instructions	

Order Level Comments

Date/Time	Added by	Comment
05/02/18 9:15 AM	MATTHEW MULZOFF	Separation: 30

Competitive Information

Market Budget:	$98,071
KECI Share:	35%
Comment:	
KPAX:	49%
KTMF:	9%
NTMF:	7%

Daypart Summary

Day/Time	% Distrib	Spots	Dollars	CPP	GRP
	100%	93	$34,325.00	$126.07	272.3
Total	100%	93	$34,325.00	$126.07	272.3

Monthly Summary

Month	Spots	Dollars
2018-May	93	$34,325.00
Total	93	$34,325.00

Transaction History

Trans	Created/Received	Created by	Status	Spot+	Spot-	$ Chg	Contract $	Comment
Queued for Electronic Contracting	5/2/18 10:06 AM					$0	$0	
Queued for Electronic Contracting	5/2/18 10:05 AM					$0	$0	
New	5/2/18 9:15 AM	MATTHEW MULZOFF	New	93		$34,325.00	$34,325.00	

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.

NAB Form PB-18 Issues

AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Station and Location:	Date:
KFCI MISSOULA / KALISPELL	5 2-18

I, American Media and Advocacy Group
do hereby request station time concerning the following issue:

America First Action

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

This broadcast time will be used by: America First Action

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

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)

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

NAB Form PB-18 Issues

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):

Brian Walsh, President
2205 Mount Eno Blvd
Alexandria, VA 22301

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):

Jon Proch, Treasurer
Brian Walsh, President

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

NAB Form PB-18 Issues

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)

Date	Signature	Contact Phone Number

TO BE SIGNED BY STATION REPRESENTATIVE

☒ **Accepted** ☐ **Accepted in Part** ☐ **Rejected**

Signature	Printed Name	Title
	Leslie O'Neill	NSM

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

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.

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

EXHIBIT N

KTVM
340 West Main St
Missoula, MT 59802

Red Eagle Media Group
815 Slaters Ln
Alexandria, VA 22314

Contract # **3327537**

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (122842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Onell
CO-OP	No
Headline #	ECR26004941
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$4,242.75
Net Total	$24,042.25
Sales Tax	

Butte-Bozeman (KTVM)

By Broadcast Month	Spots	Rate
May. 2018	99	$28,285.00
Grand Total:	99	$28,285.00

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	05/03/18-05/03/18	1	:30	5P- 5:30P (MST)	1				X				1	$330.00	$330.00	Butte-Bozeman (KTVM)	NEWS AT 5	5/2/18
2.0	Normal Line / News	05/04/18-05/04/18	1	:30	5P- 5:30P (MST)	1					X			1	$330.00	$330.00	Butte-Bozeman (KTVM)	NEWS AT 5	5/2/18
3.0	Normal Line / News	05/07/18-05/07/18	1	:30	5P- 5:30P (MST)	1	X							1	$330.00	$330.00	Butte-Bozeman (KTVM)	NEWS AT 5	5/2/18
4.0	Normal Line / News	05/08/18-05/08/18	1	:30	5P- 5:30P (MST)	1		X						1	$330.00	$330.00	Butte-Bozeman (KTVM)	NEWS AT 5	5/2/18
5.0	Normal Line / News	05/09/18-05/09/18	1	:30	5P- 5:30P (MST)	1			X					1	$330.00	$330.00	Butte-Bozeman (KTVM)	NEWS AT 5	5/2/18
6.0	Normal Line / News	05/03/18-05/03/18	1	:30	7A- 8A (MST)	2				X				2	$240.00	$480.00	Butte-Bozeman (KTVM)	TODAY SHW<	5/2/18
7.0	Normal Line / News	05/04/18-05/04/18	1	:30	7A- 8A (MST)	2					X			2	$240.00	$480.00	Butte-Bozeman (KTVM)	TODAY SHW<	5/2/18
8.0	Normal Line / News	05/07/18-05/07/18	1	:30	7A- 8A (MST)	2	X							2	$240.00	$480.00	Butte-Bozeman (KTVM)	TODAY SHW<	5/2/18
9.0	Normal Line / News	05/08/18-05/08/18	1	:30	7A- 8A (MST)	2		X						2	$240.00	$480.00	Butte-Bozeman (KTVM)	TODAY SHW<	5/2/18
10.0	Normal Line / News	05/09/18-05/09/18	1	:30	7A- 8A (MST)	2			X					2	$240.00	$480.00	Butte-Bozeman (KTVM)	TODAY SHW<	5/2/18
11.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	9P- 10P (MST)	1			X					1	$430.00	$430.00	Butte-Bozeman (KTVM)	CHICAGO PD-NBC	5/2/18
12.0	Normal Line / News	05/06/18-05/06/18	1	:30	10P- 10:30P (MST)	1							X	1	$310.00	$310.00	Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18
13.0	Normal Line / News	05/05/18-05/05/18	1	:30	5P- 5:30P (MST)	1						X		1	$260.00	$260.00	Butte-Bozeman (KTVM)	NEWS AT 5 - SA	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

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

B/E Bookend P/B Piggy Back

KTVM
340 West Main St
Missoula, MT 59802

Red Eagle Media Group
815 Slaters Ln
Alexandria, VA 22314

Contract # 3327537

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (122842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Oneill
CO-OP	No
Headline #	ECR26004941
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$4,242.75
Net Total	$24,042.25
Sales Tax	

Butte-Bozeman (KTVM)

By Broadcast Month	Spots	Rate
May. 2018	99	$28,285.00
Grand Total:	99	$28,285.00

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 / SPOT	05/03/18-05/03/18	1	:30	8A- 9A (MST)	2				X				2	$240.00	$480.00	Butte-Bozeman (KTVM)	TODAY SHW	5/2/18
15.0	Normal Line / News	05/04/18-05/04/18	1	:30	8A- 9A (MST)	2					X			2	$240.00	$480.00	Butte-Bozeman (KTVM)	TODAY SHW	5/2/18
16.0	Normal Line / News	05/07/18-05/07/18	1	:30	8A- 9A (MST)	2	X							2	$240.00	$480.00	Butte-Bozeman (KTVM)	TODAY SHW	5/2/18
17.0	Normal Line / News	05/08/18-05/08/18	1	:30	8A- 9A (MST)	2		X						2	$240.00	$480.00	Butte-Bozeman (KTVM)	TODAY SHW	5/2/18
18.0	Normal Line / News	05/09/18-05/09/18	1	:30	8A- 9A (MST)	2			X					2	$240.00	$480.00	Butte-Bozeman (KTVM)	TODAY SHW	5/2/18
19.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	9A- 10A (MST)	2							X	2	$270.00	$540.00	Butte-Bozeman (KTVM)	MEET PRESS-SUN	5/2/18
20.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	6:30P- 7P (MST)	1				X				1	$250.00	$250.00	Butte-Bozeman (KTVM)	ENT TONIGHT 30<	5/2/18
21.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	6:30P- 7P (MST)	1					X			1	$250.00	$250.00	Butte-Bozeman (KTVM)	ENT TONIGHT 30<	5/2/18
22.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30	6:30P- 7P (MST)	1	X							1	$250.00	$250.00	Butte-Bozeman (KTVM)	ENT TONIGHT 30<	5/2/18
23.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	6:30P- 7P (MST)	1		X						1	$250.00	$250.00	Butte-Bozeman (KTVM)	ENT TONIGHT 30<	5/2/18
24.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	6:30P- 7P (MST)	1			X					1	$250.00	$250.00	Butte-Bozeman (KTVM)	ENT TONIGHT 30<	5/2/18
25.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	7P- 8P (MST)	2				X				2	$350.00	$700.00	Butte-Bozeman (KTVM)	SUPERSTORE/THE GOOD PLACE	5/2/18
26.0	Normal Line / News	05/03/18-05/03/18	1	:30	10P- 10:35P (MST)	1				X				1	$360.00	$360.00	Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

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

B/E Bookend P/B Piggy Back

KTVM
340 West Main St
Missoula, MT 59802

Red Eagle Media Group
815 Slaters Ln
Alexandria, VA 22314

Contract # **3327537**

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (122842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Oneill
CO-OP	No
Headline #	ECR26004941
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$4,242.75
Net Total	$24,042.25
Sales Tax	

Butte-Bozeman (KTVM)

By Broadcast Month	Spots	Rate
May, 2018	99	$28,285.00
Grand Total:	99	$28,285.00

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
27.0	Normal Line / News	05/04/18-05/04/18	1	:30	10P- 10:35P (MST)	1					X			1	$360.00	$360.00	Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18
28.0	Normal Line / News	05/07/18-05/07/18	1	:30	10P- 10:35P (MST)	1	X							1	$360.00	$360.00	Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18
29.0	Normal Line / News	05/08/18-05/08/18	1	:30	10P- 10:35P (MST)	1		X						1	$360.00	$360.00	Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18
30.0	Normal Line / News	05/09/18-05/09/18	1	:30	10P- 10:35P (MST)	1			X					1	$360.00	$360.00	Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18
31.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	6P- 7P (MST)	1							X	1	$330.00	$330.00	Butte-Bozeman (KTVM)	DATELINE	5/2/18
32.0	Normal Line / News	05/03/18-05/03/18	1	:30	6P- 6:30P (MST)	1				X				1	$370.00	$370.00	Butte-Bozeman (KTVM)	NEWS AT 6	5/2/18
33.0	Normal Line / News	05/04/18-05/04/18	1	:30	6P- 6:30P (MST)	1					X			1	$370.00	$370.00	Butte-Bozeman (KTVM)	NEWS AT 6	5/2/18
34.0	Normal Line / News	05/07/18-05/07/18	1	:30	6P- 6:30P (MST)	1	X							1	$370.00	$370.00	Butte-Bozeman (KTVM)	NEWS AT 6	5/2/18
35.0	Normal Line / News	05/08/18-05/08/18	1	:30	6P- 6:30P (MST)	1		X						1	$370.00	$370.00	Butte-Bozeman (KTVM)	NEWS AT 6	5/2/18
36.0	Normal Line / News	05/09/18-05/09/18	1	:30	6P- 6:30P (MST)	1			X					1	$370.00	$370.00	Butte-Bozeman (KTVM)	NEWS AT 6	5/2/18
37.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	7P- 8P (MST)	1			X					1	$420.00	$420.00	Butte-Bozeman (KTVM)	BLACKLIST-NBC	5/2/18
38.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	7P- 8P (MST)	1							X	1	$330.00	$330.00	Butte-Bozeman (KTVM)	LITTLE BIG SHOTS	5/2/18
39.0	Normal Line / Hockey	05/05/18-05/05/18	2	:30	5P- 8P (MST)	1						X		1	$150.00	$150.00	Butte-Bozeman (KTVM)	NHL PLAYOFFS	5/2/18
40.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30	7P- 9P (MST)	2	X							2	$660.00	$1,320.00	Butte-Bozeman (KTVM)	VOICE-NBC	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

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

B/E Bookend P/B Piggy Back

KTVM
340 West Main St
Missoula, MT 59802

Red Eagle Media Group
815 Slaters Ln
Alexandria, VA 22314

Contract # 3327537

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (122842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Oneill
CO-OP	No
Headline #	ECR26004941
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$4,242.75
Net Total	$24,042.25
Sales Tax	

Butte-Bozeman (KTVM)

By Broadcast Month	Spots	Rate
May. 2018	99	$28,285.00
Grand Total:	99	$28,285.00

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
41.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	8P- 9P (MST)	1					X			1	$360.00	$360.00	Butte-Bozeman (KTVM)	TAKEN	5/2/18
42.0	Normal Line / SPOT	05/05/18-05/05/18	1	:30	9:30P- 11P (MST)	2						X		2	$280.00	$560.00	Butte-Bozeman (KTVM)	SAT NITE LIVE	5/2/18
43.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	4P- 5P (MST)	1				X				1	$200.00	$200.00	Butte-Bozeman (KTVM)	ELLEN	5/2/18
44.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	4P- 5P (MST)	1					X			1	$200.00	$200.00	Butte-Bozeman (KTVM)	ELLEN	5/2/18
45.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30	4P- 5P (MST)	1	X							1	$200.00	$200.00	Butte-Bozeman (KTVM)	ELLEN	5/2/18
46.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	4P- 5P (MST)	1		X						1	$200.00	$200.00	Butte-Bozeman (KTVM)	ELLEN	5/2/18
47.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	4P- 5P (MST)	1			X					1	$200.00	$200.00	Butte-Bozeman (KTVM)	ELLEN	5/2/18
48.0	Normal Line / News	05/05/18-05/05/18	1	:30	10P- 10:30P (MST)	1						X		1	$310.00	$310.00	Butte-Bozeman (KTVM)	SAT NITE LIVE	5/2/18
49.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	9P- 10P (MST)	2				X				2	$490.00	$980.00	Butte-Bozeman (KTVM)	CHCGO FIRE-NBC	5/2/18
50.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	10:35P- 11:35P (MST)	1				X				1	$230.00	$230.00	Butte-Bozeman (KTVM)	TONITE SHW-NBC	5/2/18
51.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	10:35P- 11:35P (MST)	1					X			1	$230.00	$230.00	Butte-Bozeman (KTVM)	TONITE SHW-NBC	5/2/18
52.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30	10:35P- 11:35P (MST)	1	X							1	$230.00	$230.00	Butte-Bozeman (KTVM)	TONITE SHW-NBC	5/2/18
53.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	10:35P- 11:35P (MST)	1		X						1	$230.00	$230.00	Butte-Bozeman (KTVM)	TONITE SHW-NBC	5/2/18
54.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	10:35P- 11:35P (MST)	1			X					1	$230.00	$230.00	Butte-Bozeman (KTVM)	TONITE SHW-NBC	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

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

B/E Bookend P/B Piggy Back

KTVM
340 West Main St
Missoula, MT 59802

Red Eagle Media Group
815 Slaters Ln
Alexandria, VA 22314

Contract # 3327537

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (1ZZ842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Oneill
CO-OP	No
Headline #	ECR26004941
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$4,242.75
Net Total	$24,042.25
Sales Tax	

Butte-Bozeman (KTVM)

By Broadcast Month	Spots	Rate
May. 2018	99	$28,285.00
Grand Total:	99	$28,285.00

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
55.0	Normal Line / News	05/03/18-05/03/18	1	:30	6:30A- 7A (MST)	1				X				1	$220.00	$220.00	Butte-Bozeman (KTVM)	MONTANA TODAY3	5/2/18
56.0	Normal Line / News	05/04/18-05/04/18	1	:30	6:30A- 7A (MST)	1					X			1	$220.00	$220.00	Butte-Bozeman (KTVM)	MONTANA TODAY3	5/2/18
57.0	Normal Line / News	05/07/18-05/07/18	1	:30	6:30A- 7A (MST)	1	X							1	$220.00	$220.00	Butte-Bozeman (KTVM)	MONTANA TODAY3	5/2/18
58.0	Normal Line / News	05/08/18-05/08/18	1	:30	6:30A- 7A (MST)	1		X						1	$220.00	$220.00	Butte-Bozeman (KTVM)	MONTANA TODAY3	5/2/18
59.0	Normal Line / News	05/09/18-05/09/18	1	:30	6:30A- 7A (MST)	1			X					1	$220.00	$220.00	Butte-Bozeman (KTVM)	MONTANA TODAY3	5/2/18
60.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	8P- 9P (MST)	1			X					1	$390.00	$390.00	Butte-Bozeman (KTVM)	LAW & ORDER	5/2/18
61.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	7P- 8P (MST)	1					X			1	$350.00	$350.00	Butte-Bozeman (KTVM)	BLINDSPOT-NBC	5/2/18
62.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	8P- 9P (MST)	2		X						2	$420.00	$840.00	Butte-Bozeman (KTVM)	RISE	5/2/18
63.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	11:05P- 12:05A (MST)	1							X	1	$170.00	$170.00	Butte-Bozeman (KTVM)	ENT TONIGHT 60	5/2/18
64.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	10:35P- 11:05P (MST)	1							X	1	$200.00	$200.00	Butte-Bozeman (KTVM)	FULL MEASURE	5/2/18
65.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	7P- 8P (MST)	2		X						2	$630.00	$1,260.00	Butte-Bozeman (KTVM)	VOICE-TUE-NBC	5/2/18
66.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	10A- 11A (MST)	2				X				2	$190.00	$380.00	Butte-Bozeman (KTVM)	LIVE-KELLY&RYAN	5/2/18
67.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	10A- 11A (MST)	2					X			2	$190.00	$380.00	Butte-Bozeman (KTVM)	LIVE-KELLY&RYAN	5/2/18
68.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30	10A- 11A (MST)	2	X							2	$190.00	$380.00	Butte-Bozeman (KTVM)	LIVE-KELLY&RYAN	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

The parties intend for the Standard Advertiser Terms and Conditions ("Terms") located at... http://sbgi.net/?p=1234 ... to be part of their agreement, and the sale of advertising is expressly subject to said Terms.

B/E Bookend P/B Piggy Back

KTVM
340 West Main St
Missoula, MT 59802

Red Eagle Media Group
815 Slalers Ln
Alexandria, VA 22314

Contract # 3327537

Schedule Dates	05/03/18-05/09/18
Advertiser	America First Action (122842)
Agency	Red Eagle Media Group (15829)
Product	POLITICAL ISSUE (ns) (1187)
Brand	ISSUE ADVERTISING (218560)
Salesperson	Katz/DC, Washington DC (4022)
Sales Office	Katz Washington DC
Buyer Name	Media Med,Eagle
Phone/Fax	/
CPE	622/1149/9355
Account Types	National/Political Issue Agency BRD
Billing Type	Standard
Comments	America First Separation: 30

Date Entered	05/02/18
Last Modified	05/02/18
Entered By	Leslie Stoll-Oneill
CO-OP	No
Headline #	ECR26004941
Demo	
Order Type	Normal
Package Deal	
Commission %	15.00
Commission	$4,242.75
Net Total	$24,042.25
Sales Tax	

Butte-Bozeman (KTVM)

By Broadcast Month	Spots	Rate
May. 2018	99	$28,285.00
Grand Total:	99	$28,285.00

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
69.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	10A- 11A (MST)	2		X						2	$190.00	$380.00	Butte-Bozeman (KTVM)	LVE-KELLY&RYAN	5/2/18
70.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	10A- 11A (MST)	2			X					2	$190.00	$380.00	Butte-Bozeman (KTVM)	LVE-KELLY&RYAN	5/2/18
71.0	Normal Line / Hockey	05/05/18-05/05/18	2	:30	10A- 5P (MST)	2						X		2	$100.00	$200.00	Butte-Bozeman (KTVM)	NHL PLAYOFFS DAY	5/2/18
72.0	Normal Line / Hockey	05/06/18-05/06/18	2	:30	10A- 5P (MST)	2							X	2	$100.00	$200.00	Butte-Bozeman (KTVM)	NHL PLAYOFFS DAY	5/2/18
73.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	9P- 10P (MST)	1							X	1	$470.00	$470.00	Butte-Bozeman (KTVM)	TIMELESS	5/2/18
74.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	8P- 9P (MST)	1				X				1	$490.00	$490.00	Butte-Bozeman (KTVM)	WILL AND GRACE/ AP BIO	5/2/18
75.0	Normal Line / Horse Racing	05/05/18-05/05/18	1	:30	4:30P- 5:15P (MST)	1						X		1	$215.00	$215.00	Butte-Bozeman (KTVM)	KENTUCKY DERBY	5/2/18

CONFIRMATION CONTRACT

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:

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

B/E Bookend P/B Piggy Back

125 West 55th St
New York, NY 10019

Contract # 26004941 | Changes as of: 5/2/2018 at 10:38 AM | Version: Current State Version 1

CPE: 622/1149/9355 | Flight: 5/3/18 - 5/9/18 | Station: KTVM | Con Type: POLITICAL/VOTE

Agency: RED EAGLE MEDIA GROU
RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA VA 22314

Advertiser: America First Action | Market: Butte, MT | Total $: $28,285.00

Product: America First | Office: WASHINGTON | Total Spots: 99

Agency Order #: 7314741 | Service: Nielsen | Total CPP: $104.15

Buyer: Eagle Media Media Assistant, Red | Primary Demo: Adults 35-64 | Total GRP: 271.6

Salesperson: MATTHEW MULZOFF 202-955-5342 | Assistant: MATTHEW MULZOFF 202-955-5342 | Traffic #: 3327537

Separation:

Comments: Separation: 30

#	Day/Time	DP	Program	Rate	A3564 Rating	A35P Rating	Len	5/3 - 5/9								Total Spots	Total $	CPP*	GRP*
								5/3	5/4	5/5	5/6	5/7	5/8	5/9					
1	Th-F,M-W 5p-5:30p		NEWS AT 5	$330.00	4.5	5.9	30	1	1	0	0	1	1	1		5	$1,650.00	$72.69	22.7
2	Th-F,M-W 7a-8a		TODAY SHW<	$240.00	3.4	3.9	30	2	2	0	0	2	2	2		10	$2,400.00	$70.59	34.0
3	W 9p-10p		CHICAGO PD-NBC	$430.00	1.5	6.4	30	0	0	0	0	0	0	1		1	$430.00	$290.54	1.5
4	Su 10p-10:30p		NEWS AT 10	$310.00	4.0	4.5	30	0	0	0	1	0	0	0		1	$310.00	$77.50	4.0
5	Sa 5p-5:30p		NEWS AT 5 - SA	$260.00	2.6	3.7	30	0	0	1	0	0	0	0		1	$260.00	$100.78	2.6
6	Th-F,M-W 8a-9a		TODAY SHW	$240.00	2.4	3.3	30	2	2	0	0	2	2	2		10	$2,400.00	$102.13	23.5
7	Su 9a-10a		MEET PRESS-SUN	$270.00	2.8	3.6	30	0	0	0	2	0	0	0		2	$540.00	$96.43	5.6
8	Th-F,M-W 6:30p-7p		ENT TONIGHT 30<	$250.00	2.7	3.1	30	1	1	0	0	1	1	1		5	$1,250.00	$93.63	13.3
9	Th 7p-8p		SUPERSTORE/THE GOOD PLACE	$350.00	3.6	4.1	30	2	0	0	0	0	0	0		2	$700.00	$97.49	7.2
10	Th-F,M-W 10p-10:35p		NEWS AT 10	$360.00	4.0	4.0	30	1	1	0	0	1	1	1		5	$1,800.00	$90.23	20.0
11	Su 6p-7p		DATELINE	$330.00	2.0	3.5	30	0	0	0	1	0	0	0		1	$330.00	$165.00	2.0
12	Th-F,M-W 6p-6:30p		NEWS AT 6	$370.00	2.9	3.9	30	1	1	0	0	1	1	1		5	$1,850.00	$126.71	14.6
13	W 7p-8p		BLACKLIST-NBC	$420.00	2.6	4.3	30	0	0	0	0	0	0	1		1	$420.00	$161.54	2.6
14	Su 7p-8p		LITTLE BIG SHOTS	$330.00	2.5	3.3	30	0	0	0	1	0	0	0		1	$330.00	$132.00	2.5
15	Sa 5p-8p		NHL PLAYOFFS	$150.00	4.0	1.4	30	0	0	1	0	0	0	0		1	$150.00	$37.50	4.0
16	M 7p-9p		VOICE-NBC	$660.00	6.0	6.1	30	0	0	0	0	2	0	0		2	$1,320.00	$109.45	12.1
17	F 8p-9p		TAKEN	$360.00	1.9	3.4	30	0	1	0	0	0	0	0		1	$360.00	$187.50	1.9
18	Sa 9:30p-11p		SAT NITE LIVE	$280.00	2.6	2.4	30	0	0	2	0	0	0	0		2	$560.00	$100.00	5.6

KATZ TELEVISION GROUP

125 West 55th St
New York, NY 10019

Contract # 26004941 | Changes as of: 5/2/2018 at 10:38 AM | Version: Current State Version 1

CPE: 622/1149/9355
Flight: 5/3/18 - 5/9/18
Station: KTVM
Con Type: POLITICAL/VOTE

Agency: RED EAGLE MEDIA GROU
RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA VA 22314
Advertiser: America First Action
Market: Butte, MT
Total $: $28,285.00

Product: America First
Office: WASHINGTON
Total Spots: 99

Agency Order #: 7314741
Service: Nielsen
Total CPP: $104.15

Buyer: Eagle Media Media Assistant, Red
Primary Demo: Adults 35-64
Total GRP: 271.6

Salesperson: MATTHEW MULZOFF 202-955-5342
Assistant: MATTHEW MULZOFF 202-955-5342
Traffic #: 3327537

Separation:

#	Day/Time	DP	Program	Rate	A3564 Rating	A35P Rating	Len	5/3	5/4	5/5	5/6	5/7	5/8	5/9		Total Spots	Total $	CPP*	GRP*
								5/3 - 5/9											
19	Th-F,M-W 4p-5p		ELLEN	$200.00	1.9	1.7	30	1	1	0	0	1	1	1		5	$1,000.00	$104.71	9.5
20	Sa 10p-10:30p		SAT NITE LIVE	$310.00	3.2	2.6	30	0	0	1	0	0	0	0		1	$310.00	$97.79	3.2
21	Th 9p-10p		CHCGO FIRE-NBC	$490.00	4.0	4.1	30	2	0	0	0	0	0	0		2	$980.00	$120.99	8.1
22	Th-F,M-W 10:35p-11:35p		TONITE SHW-NBC	$230.00	2.2	1.9	30	1	1	0	0	1	1	1		5	$1,150.00	$106.48	10.8
23	Th-F,M-W 6:30a-7a		MONTANA TODAY3	$220.00	1.5	1.8	30	1	1	0	0	1	1	1		5	$1,100.00	$149.66	7.3
24	W 8p-9p		LAW & ORDER	$390.00	1.9	3.2	30	0	0	0	0	0	0	1		1	$390.00	$203.13	1.9
25	F 7p-8p		BLINDSPOT-NBC	$350.00	2.0	2.7	30	0	1	0	0	0	0	0		1	$350.00	$177.66	2.0
26	Tu 8p-9p		RISE	$420.00	3.2	3.1	30	0	0	0	0	0	2	0		2	$840.00	$130.84	6.4
27	Su 11:05p-12:05a		ENT TONIGHT 60	$170.00	1.7	1.2	30	0	0	0	1	0	0	0		1	$170.00	$98.27	1.7
28	Su 10:35p-11:05p		FULL MEASURE	$200.00	1.2	1.4	30	0	0	0	1	0	0	0		1	$200.00	$170.94	1.2
29	Tu 7p-8p		VOICE-TUE-NBC	$630.00	3.7	4.1	30	0	0	0	0	0	2	0		2	$1,260.00	$171.66	7.3
30	Th-F,M-W 10a-11a		LVE-KELLY&RYAN	$190.00	1.2	1.2	30	2	2	0	0	2	2	2		10	$1,900.00	$163.79	11.6
31	Sa-Su 10a-5p		NHL PLAYOFFS DAY	$100.00	3.0	0.6	30	0	0	2	2	0	0	0		4	$400.00	$33.33	12.0
32	Su 9p-10p		TIMELESS	$470.00	2.7	2.3	30	0	0	0	1	0	0	0		1	$470.00	$176.69	2.7
33	Th 8p-9p		WILL AND GRACE/ AP BIO	$490.00	2.2	2.3	30	1	0	0	0	0	0	0		1	$490.00	$224.77	2.2
34	Sa 4:30p-5:15p		KENTUCKY DERBY	$215.00	4.0	0.5	30	0	0	1	0	0	0	0		1	$215.00	$53.75	4.0
							TOTALS:	18	15	8	10	15	17	16		99	$28,285.00	$104.15	271.6

Printed on 05/02/2018 at 12:53 PM | * Stats based on Primary Demo

125 West 55th St
New York, NY 10019

Contract # 26004941	Changes as of: 5/2/2018 at 10:38 AM	Version: Current State Version 1	
CPE: 622/1149/9355	Flight: 5/3/18 - 5/9/18	Station: KTVM	Con Type: POLITICAL/VOTE
Agency: RED EAGLE MEDIA GROU RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA VA 22314	Advertiser: America First Action	Market: Butte, MT	Total $: $28,285.00
	Product: America First	Office: WASHINGTON	Total Spots: 99
	Agency Order #: 7314741	Service: Nielsen	Total CPP: $104.15
	Buyer: Eagle Media Media Assistant, Red	Primary Demo: Adults 35-64	Total GRP: 271.6
	Salesperson: MATTHEW MULZOFF 202-955-5342	Assistant: MATTHEW MULZOFF 202-955-5342	Traffic #: 3327537
	Separation:		

Special Instructions:

Order Level Comments

Date/Time	Added by	Comment
05/02/18 10:38 AM	System	Notice Received.
05/02/18 9:17 AM	MATTHEW MULZOFF	Separation: 30

Competitive Information

Market Budget:	$52,380
KTVM Share:	54%
Comment:	
KWYB:	14%
KXLF:	18%
NWYB:	14%

Daypart Summary

Day/Time	% Distrib	Spots	Dollars	CPP	GRP
	100%	99	$28,285.00	$104.15	271.6
Total	100%	99	$28,285.00	$104.15	271.6

Monthly Summary

Month	Spots	Dollars
2018-May	99	$28,285.00
Total	99	$28,285.00

Transaction History

Trans	Created/Received	Created by	Status	Spot+	Spot-	$ Chg	Contract $	Comment
Queued for Electronic Contracting	5/2/18 10:05 AM					$0	$0	
New	5/2/18 9:17 AM	MATTHEW MULZOFF	Confirmed	99		$28,285.00	$28,285.00	

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.

NAB Form PB-18 Issues

AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Station and Location:	Date:
KTVM BUTTE/BOZEMAN	5/2/18

I, American Media and Advocacy Group
do hereby request station time concerning the following issue:

America First Action

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

This broadcast time will be used by: America First Action

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

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)

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

NAB Form PB-18 Issues

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):

Brian Walsh, President
2205 Mount Line Blvd
Alexandria, VA 22301

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):

Jon Proch, Treasurer
Brian Walsh, President

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

NAB Form PB-18 Issues

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)

Date	Signature	Contact Phone Number

TO BE SIGNED BY STATION REPRESENTATIVE

☒ **Accepted** ☐ **Accepted in Part** ☐ **Rejected**

Signature	Printed Name	Title
	Leslie O'Neill	NSM

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

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.

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

EXHIBIT O

ORDER

KMOV

Orders	**Order / Rev:**	**898464**		
	Alt Order #:	09197759		
	Product Desc:	HAWLEY 4 SENATE		
	Estimate:	9872		
	Flight Dates:	10/02/18 - 10/08/18	Primary AE:	Mica Hansen
	Original Date / Rev:	08/21/18 / 10/09/18	Sales Office:	H-WDC
	Order Type:	GENERAL	Sales Region:	National
Agency	**Name:**	**American Media & Advocacy Group**		
	Buying Contact:	John Jay	Billing Type:	Cash
	Billing Contact:		Billing Calendar:	Broadcast
		815 Slaters Lane	Billing Cycle:	EOM/EOC
		Alexandria, VA 22314	Agency Commission:	15%
Advertiser	**Name:**	**Josh Hawley For Senate**		
	Demographic:	A35+	New Business Thru:	
	Product Codes:	Political-Cand-Senate	Order Separation:	00:15:00
	Priority:	PMT	Advertiser External ID:	
	Revenue Code 1:	POL	Agency External ID:	
	Revenue Code 2:	PLC	Unit Code:	General
	Revenue Code 3:	SPL		

Bill Plan

Start Date	End Date	# Spots	Gross Amount	Net Amount
10/01/18	10/08/18	57	$50,175.00	$42,648.75

Totals

Month	# Spots	Gross Amount	Net Amount	Rating
October 2018	57	$50,175.00	$42,648.75	0.00
Totals	57	$50,175.00	$42,648.75	0.00

Account Executives

Account Executive	Sales Office	Sales Region	Start Date / End Date	Order %
Mica Hansen			Start Of Order - End Of Order	100%

Order Share	Share	Total
KMOV	28%	$50,175.00
Market	100%	$179,196.43

Competitive Share	Share	Total
CABLE	0%	$0.00
KDNL	11%	$19,711.61
KETC	0%	$0.00
KPLR	1%	$1,791.96
KSDK	33%	$59,134.82
KTVI	27%	$48,383.04
MMOV	0%	$0.00
QMOV	0%	$0.00
UNKWN	0%	$0.00
WPXS	0%	$0.00

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg Type	Spots	Amount
N 1	KMOV	10/02/18	10/02/18	M-F 4-430am News 4 @ 4a	CM	M-F 4-430am	-1-----	:30	1	$75.00	PMT	0.00 NM	1	$75.00
	Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:	10/01/18	10/07/18	-1-----	1	$75.00	0.00								
N 2	KMOV	10/05/18	10/05/18		CM	M-F 6-7am	----1--	:30	1	$400.00	PMT	0.00 NM	1	$400.00

Order / Rev: 898464
Alt Order #: 09197759
Flight Dates: 10/02/18 - 10/08/18

Advertiser: Josh Hawley For Senate
Product Desc: HAWLEY 4 SENATE
Estimate: 9872

KMOV

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg Type	Spots	Amount
				M-F 6-7am News 4 @ 6a		(6:00 AM-6:30 AM)								
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/01/18	10/07/18	----1--	1	$400.00	0.00							
N 3	KMOV	10/03/18	10/03/18	M-F 6-7am News 4 @ 6a	CM	M-F 6-7am (6:30 AM-7:00 AM)	--1----	:30	1	$400.00	PMT	0.00 NM	1	$400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/01/18	10/07/18	--1----	1	$400.00	0.00							
N 4	KMOV	10/04/18	10/04/18	M-F 6-7am News 4 @ 6a	CM	M-F 6-7am (6:30 AM-7:00 AM)	---1---	:30	1	$400.00	PMT	0.00 NM	1	$400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/01/18	10/07/18	---1---	1	$400.00	0.00							
N 5	KMOV	10/05/18	10/05/18	M-F 6-7am News 4 @ 6a	CM	M-F 6-7am (6:30 AM-7:00 AM)	----1--	:30	1	$400.00	PMT	0.00 NM	1	$400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/01/18	10/07/18	----1--	1	$400.00	0.00							
N 6	KMOV	10/05/18	10/05/18	M-F 7-9am CBS This Morning	CM	M-F 7-9am	----1--	:30	1	$300.00	PMT	0.00 NM	1	$300.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/01/18	10/07/18	----1--	1	$300.00	0.00							
N 7	KMOV	10/05/18	10/05/18	M-F 9-10am Great Day St. Louis	CM	M-F 9-10am	----1--	:30	1	$200.00	PMT	0.00 NM	1	$200.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/01/18	10/07/18	----1--	1	$200.00	0.00							
N 8	KMOV	10/07/18	10/07/18	Sun 6-8am News 4 This Morning	CM	Sun 6-8am (7:00 AM-8:00 AM)	------1	:30	1	$200.00	PMT	0.00 NM	1	$200.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/01/18	10/07/18	------1	1	$200.00	0.00							
N 9	KMOV	10/08/18	10/08/18	Y&R 11am-12pm Young and the Restless	CM	M-F 11a-12pm	1------	:30	1	$1,000.00	FNP	0.00 NM	1	$1,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/08/18	10/14/18	1------	1	$1,000.00	0.00							
N 11	KMOV	10/03/18	10/03/18	Y&R 11am-12pm Young and the Restless	CM	M-F 11a-12pm	--1----	:30	1	$1,000.00	FNP	0.00 NM	1	$1,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/01/18	10/07/18	--1----	1	$1,000.00	0.00							
N 12	KMOV	10/08/18	10/08/18	M-F 430-5am News 4 @ 430a	CM	M-F 430-5am	1------	:30	1	$150.00	PMT	0.00 NM	1	$150.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/08/18	10/14/18	1------	1	$150.00	0.00							
N 14	KMOV	10/05/18	10/05/18	Y&R 11am-12pm Young and the Restless	CM	M-F 11a-12pm	----1--	:30	1	$1,000.00	FNP	0.00 NM	1	$1,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/01/18	10/07/18	----1--	1	$1,000.00	0.00							
N 15	KMOV	10/05/18	10/05/18	M-F 430-5pm Inside Edition	CM	M-F 430-5pm	----1--	:30	1	$450.00	PMT	0.00 NM	1	$450.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/01/18	10/07/18	----1--	1	$450.00	0.00							
N 16	KMOV	10/08/18	10/08/18	M-F 4-430pm News News 4 @4pm	CM	M-F 4-430pm	1------	:30	1	$400.00	PMT	0.00 NM	1	$400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/08/18	10/14/18	1------	1	$400.00	0.00							
N 17	KMOV	10/02/18	10/02/18	M-F 4-430pm News News 4 @4pm	CM	M-F 4-430pm	-1-----	:30	1	$400.00	PMT	0.00 NM	1	$400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							
Week:		10/01/18	10/07/18	-1-----	1	$400.00	0.00							
N 18	KMOV	10/03/18	10/03/18	M-F 4-430pm News News 4 @4pm	CM	M-F 4-430pm	--1----	:30	1	$400.00	PMT	0.00 NM	1	$400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating							

Order / Rev: 898464
Alt Order #: 09197759
Flight Dates: 10/02/18 - 10/08/18

Advertiser: Josh Hawley For Senate
Product Desc: HAWLEY 4 SENATE
Estimate: 9872

KMOV

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	--1----	1	$400.00	0.00								
N19	KMOV	10/04/18	10/04/18	M-F 4-430pm News News 4 @4pm	CM	M-F 4-430pm	---1---	:30	1	$400.00	PMT	0.00	NM	1	$400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	---1---	1	$400.00	0.00								
N20	KMOV	10/05/18	10/05/18	M-F 4-430pm News News 4 @4pm	CM	M-F 4-430pm	----1--	:30	1	$400.00	PMT	0.00	NM	1	$400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	----1--	1	$400.00	0.00								
N21	KMOV	10/02/18	10/02/18	M-F 5-5:30p News 4 @ 5p	CM	M-F 5-5:30p	-1-----	:30	1	$750.00	PMT	0.00	NM	1	$750.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	-1-----	1	$750.00	0.00								
N22	KMOV	10/03/18	10/03/18	M-F 5-5:30p News 4 @ 5p	CM	M-F 5-5:30p	--1----	:30	1	$750.00	PMT	0.00	NM	1	$750.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	--1----	1	$750.00	0.00								
N23	KMOV	10/05/18	10/05/18	M-F 430-5am News 4 @ 430a	CM	M-F 430-5am	----1--	:30	1	$150.00	PMT	0.00	NM	1	$150.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	----1--	1	$150.00	0.00								
N24	KMOV	10/04/18	10/04/18	M-F 5-5:30p News 4 @ 5p	CM	M-F 5-5:30p	---1---	:30	1	$750.00	PMT	0.00	NM	1	$750.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	---1---	1	$750.00	0.00								
N25	KMOV	10/05/18	10/05/18	M-F 5-5:30p News 4 @ 5p	CM	M-F 5-5:30p	----1--	:30	1	$750.00	PMT	0.00	NM	1	$750.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	----1--	1	$750.00	0.00								
N26	KMOV	10/06/18	10/06/18	Sat 6-6:30pm News 4 @ 6p	CM	Sat 6-6:30pm	-----1-	:30	1	$350.00	PMT	0.00	NM	0	$0.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	-----1-	1	$350.00	0.00								
Spot	Ch	Date Range		Description		Start/End Time		Weekdays		Length		Rate	Rtg	Type	
1	*KMOV*	*10/01/18-10/07/18*		*Sat 6-6:30pm*		Sat 6-6:30pm		------Sa--		*:30*		*~~($350.00)~~*	0.00	*NM*	
	Credited														
N27	KMOV	10/08/18	10/08/18	M-F 6:30-7pm Entertainment Tonight	CM	M-F 6:30-7pm	1------	:30	1	$1,000.00	FNP	0.00	NM	1	$1,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/08/18	10/14/18	1------	1	$1,000.00	0.00								
N29	KMOV	10/03/18	10/03/18	M-F 6:30-7pm Entertainment Tonight	CM	M-F 6:30-7pm	--1----	:30	1	$1,000.00	FNP	0.00	NM	1	$1,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	--1----	1	$1,000.00	0.00								
N31	KMOV	10/05/18	10/05/18	M-F 6:30-7pm Entertainment Tonight	CM	M-F 6:30-7pm	----1--	:30	1	$1,000.00	FNP	0.00	NM	1	$1,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	----1--	1	$1,000.00	0.00								
N32	KMOV	10/08/18	10/08/18	Mon 9-10pm Bull	CM	Mon 9-10pm	1------	:30	1	$3,000.00	PMT	0.00	NM	1	$3,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/08/18	10/14/18	1------	1	$3,000.00	0.00								
Spot	Ch	Date Range		Description		Start/End Time		Weekdays		Length		Rate	Rtg	Type	
1	*KMOV*	*10/08/18-10/14/18*		*Mon 9-10pm*		Mon 9-10pm		M---------		*:30*		*~~($3,000.00)~~*	0.00	*NM*	
	See MG 32.2														
	[Incorrect Priority Code]														
2	KMOV	10/08/18-10/08/18		Mon 9-10pm		Mon 9-10pm		M---------		:30		$3,000.00	0.00	NM	
	Ⓜ MG for 32.1 10/08														

Order / Rev: 898464
Alt Order #: 09197759
Flight Dates: 10/02/18 - 10/08/18

Advertiser: Josh Hawley For Senate
Product Desc: HAWLEY 4 SENATE
Estimate: 9872

KMOV

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
N33	KMOV	10/02/18	10/02/18	Tue 7-8pm NCIS	CM	Tue 7-8pm	-1-----	:30	1	$3,500.00	PMT	0.00	NM	1	$3,500.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
	Week:	10/01/18	10/07/18	-1-----	1	$3,500.00	0.00								
N34	KMOV	10/04/18	10/04/18	M-F 5-6am News 4 @ 5a	CM	M-F 5-6am (5:00 AM-5:30 AM)	---1---	:30	1	$300.00	PMT	0.00	NM	1	$300.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
	Week:	10/01/18	10/07/18	---1---	1	$300.00	0.00								
N35	KMOV	10/02/18	10/02/18	Tue 8-9pm FBI	CM	Tue 8-9pm	-1-----	:30	1	$4,000.00	PMT	0.00	NM	1	$4,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
	Week:	10/01/18	10/07/18	-1-----	1	$4,000.00	0.00								
N36	KMOV	10/02/18	10/02/18	Tue 9-10pm NCIS: New Orleans	CM	Tue 9-10pm	-1-----	:30	1	$2,000.00	PMT	0.00	NM	1	$3,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
	Week:	10/01/18	10/07/18	-1-----	1	$2,000.00	0.00								
	Spot	Ch	Date Range	Description		Start/End Time		Weekdays		Length	Rate	Rtg	Type		
	1	KMOV	10/01/18-10/07/18	Tue 9-10pm		Tue 9-10pm		-T--------		:30	~~($2,000.00)~~	0.00	NM		
			See MG 36.2 [Preempted per Lisa Woods]												
	2	KMOV	10/01/18-10/07/18	Tue 9-10pm		Tue 9-10pm		-T--------		:30	$3,000.00	0.00	NM		
		Ⓜ	MG for 36.1 10/02												
N37	KMOV	10/04/18	10/04/18	Thu 7-8pm Big Bang Theory/Young Sheldoı	CM	Thu 7-8pm	---1---	:30	1	$2,500.00	PMT	0.00	NM	1	$5,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
	Week:	10/01/18	10/07/18	---1---	1	$2,500.00	0.00								
	Spot	Ch	Date Range	Description		Start/End Time		Weekdays		Length	Rate	Rtg	Type		
	1	KMOV	10/01/18-10/07/18	Thu 7-8pm		Thu 7-8pm		---Th-----		:30	~~($2,500.00)~~	0.00	NM		
			See MG 37.2 [Preempted per Lisa Woods]												
	2	KMOV	10/01/18-10/07/18	Thu 7-8pm		Thu 7-8pm		---Th-----		:30	$5,000.00	0.00	NM		
		Ⓜ	MG for 37.1 10/04												
N38	KMOV	10/06/18	10/06/18	Sat 8-9pm Crimetime Saturday	CM	Sat 8-9pm	-----1-	:30	1	$1,000.00	PMT	0.00	NM	0	$0.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
	Week:	10/01/18	10/07/18	-----1-	1	$1,000.00	0.00								
	Spot	Ch	Date Range	Description		Start/End Time		Weekdays		Length	Rate	Rtg	Type		
	1	KMOV	10/01/18-10/07/18	Sat 8-9pm		Sat 8-9pm		------Sa--		:30	~~($1,000.00)~~	0.00	NM		
			See MG 59.2,59.3 [PROGRAM CHANGE -- GOD FRIENDED ME (OTO)]												
N39	KMOV	10/06/18	10/06/18	Sa Late News News 4 @ 10p Saturday	CM	Sa Late News	-----1-	:30	1	$1,000.00	PMT	0.00	NM	1	$1,000.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
	Week:	10/01/18	10/07/18	-----1-	1	$1,000.00	0.00								
N40	KMOV	10/06/18	10/06/18	Sat 10:30-11p News News 4 @ 10:30p Saturday	CM	Sat 10:30-11p Nev	-----1-	:30	1	$600.00	PMT	0.00	NM	1	$600.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
	Week:	10/01/18	10/07/18	-----1-	1	$600.00	0.00								
N41	KMOV	10/08/18	10/08/18	M-F Late News M-F Late News	CM	M-F Late News	1------	:30	1	$1,250.00	PMT	0.00	NM	1	$1,250.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
	Week:	10/08/18	10/14/18	1------	1	$1,250.00	0.00								
N42	KMOV	10/02/18	10/02/18	M-F Late News M-F Late News	CM	M-F Late News	-1-----	:30	1	$1,250.00	PMT	0.00	NM	1	$1,250.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
	Week:	10/01/18	10/07/18	-1-----	1	$1,250.00	0.00								
N43	KMOV	10/03/18	10/03/18	M-F Late News M-F Late News	CM	M-F Late News	--1----	:30	1	$1,250.00	PMT	0.00	NM	1	$1,250.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								

Order / Rev: 898464
Alt Order #: 09197759
Flight Dates: 10/02/18 - 10/08/18

Advertiser: Josh Hawley For Senate
Product Desc: HAWLEY 4 SENATE
Estimate: 9872

KMOV

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	--1----	1	$1,250.00	0.00								
N44	KMOV	10/04/18	10/04/18	M-F Late News	CM	M-F Late News	---1---	:30	1	$1,250.00	PMT	0.00	NM	1	$1,250.00
				M-F Late News											
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	---1---	1	$1,250.00	0.00								
N45	KMOV	10/05/18	10/05/18	M-F 5-6am	CM	M-F 5-6am	----1--	:30	1	$300.00	PMT	0.00	NM	1	$300.00
				News 4 @ 5a											
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	----1--	1	$300.00	0.00								
N46	KMOV	10/05/18	10/05/18	M-F Late News	CM	M-F Late News	----1--	:30	1	$1,250.00	PMT	0.00	NM	1	$1,250.00
				M-F Late News											
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	----1--	1	$1,250.00	0.00								
N47	KMOV	10/08/18	10/08/18	Colbert	CM	M-F 10:35p-11:37p	1------	:30	1	$350.00	PMT	0.00	NM	1	$350.00
				Late Show with Stephen Colbert											
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/08/18	10/14/18	1------	1	$350.00	0.00								
N48	KMOV	10/03/18	10/03/18	Colbert	CM	M-F 10:35p-11:37p	--1----	:30	1	$350.00	PMT	0.00	NM	1	$350.00
				Late Show with Stephen Colbert											
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	--1----	1	$350.00	0.00								
N49	KMOV	10/05/18	10/05/18	Colbert	CM	M-F 10:35p-11:37p	----1--	:30	1	$350.00	PMT	0.00	NM	1	$350.00
				Late Show with Stephen Colbert											
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	----1--	1	$350.00	0.00								
N50	KMOV	10/02/18	10/02/18	The Late Late Show	CM	The Late Late Sho	-1-----	:30	1	$150.00	PMT	0.00	NM	1	$150.00
				James Corden											
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	-1-----	1	$150.00	0.00								
N51	KMOV	10/03/18	10/03/18	The Late Late Show	CM	The Late Late Sho	--1----	:30	1	$150.00	PMT	0.00	NM	1	$150.00
				James Corden											
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	--1----	1	$150.00	0.00								
N52	KMOV	10/04/18	10/04/18	The Late Late Show	CM	The Late Late Sho	---1---	:30	1	$150.00	PMT	0.00	NM	1	$150.00
				James Corden											
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	---1---	1	$150.00	0.00								
N53	KMOV	10/05/18	10/05/18	The Late Late Show	CM	The Late Late Sho	----1--	:30	1	$150.00	PMT	0.00	NM	1	$150.00
				James Corden											
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	----1--	1	$150.00	0.00								
N54	KMOV	10/07/18	10/07/18	NFL Early Game	CM	NFL Early Game	------1	:30	1	$3,750.00	PMT	0.00	NM	1	$3,750.00
				NFL Early Game											
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	------1	1	$3,750.00	0.00								
N55	KMOV	10/02/18	10/02/18	M-F 5-6am	CM	M-F 5-6am	-1-----	:30	1	$300.00	PMT	0.00	NM	1	$300.00
				News 4 @ 5a		(5:30 AM-6:00 AM)									
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	-1-----	1	$300.00	0.00								
N56	KMOV	10/03/18	10/03/18	M-F 5-6am	CM	M-F 5-6am	--1----	:30	1	$300.00	PMT	0.00	NM	1	$300.00
				News 4 @ 5a		(5:30 AM-6:00 AM)									
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	--1----	1	$300.00	0.00								
N57	KMOV	10/05/18	10/05/18	M-F 5-6am	CM	M-F 5-6am	----1--	:30	1	$300.00	PMT	0.00	NM	1	$300.00
				News 4 @ 5a		(5:30 AM-6:00 AM)									
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
		Week: 10/01/18	10/07/18	----1--	1	$300.00	0.00								
N58	KMOV	10/08/18	10/08/18		CM	M-F 6-7am		:30	1	$400.00	PMT	0.00	NM	1	$400.00

Order / Rev: 898464
Alt Order #: 09197759
Flight Dates: 10/02/18 - 10/08/18

Advertiser: Josh Hawley For Senate
Product Desc: HAWLEY 4 SENATE
Estimate: 9872

KMOV

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
				M-F 6-7am News 4 @ 6a		(6:00 AM-6:30 AM)	1------								
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/08/18	10/14/18	1------	1	$400.00	0.00								
N59	KMOV	10/06/18	10/06/18	Sat 7-8pm Crimetime Saturday	CM	Sat 7-8pm	-----S-	:30	1	$750.00	PMT	0.00	NM	2	$1,750.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	-----S-	1	$750.00	0.00								
Spot	Ch	Date Range		Description		Start/End Time		Weekdays		Length		Rate	Rtg	Type	
1	*<MOV*	*10/01/18-10/07/18*		*Sat 7-8pm*		Sat 7-8pm		------Sa--		*:30*		*~~($750.00)~~*	0.00	*NM*	
	See MG 59.2,59.3														
	[PROGRAM CHANGE -- THE NEIGHBORHOOD/HAPPY TOGETHER (OTO)]														
2	<MOV	10/01/18-10/07/18		Sat 7-8pm		Sat 7-8pm		------Sa--		:30		$750.00	0.00	NM	
Ⓜ	MG for 38.1,59.1														
3	<MOV	10/01/18-10/07/18		Sat 8-9pm		Sat 8-9pm		------Sa--		:30		$1,000.00	0.00	NM	
Ⓜ	MG for 38.1,59.1														
N60	KMOV	10/07/18	10/07/18	Sports Sunday Sports Sunday	CM	Sports Sunday	------S	:30	1	$400.00	PMT	0.00	NM	1	$400.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	------S	1	$400.00	0.00								
N61	KMOV	10/03/18	10/05/18	The Late Late Show James Corden	CM	The Late Late Sho	--WTF--	:30	1	$150.00	PMT	0.00	NM	1	$150.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	--WTF--	1	$150.00	0.00								
N62	KMOV	10/03/18	10/05/18	M-F 12:37-1:07am Inside Edition	CM	M-F 12:37-1:07am	--WTF--	:30	1	$100.00	PMT	0.00	NM	1	$100.00
		Start Date	End Date	Weekdays	Spots/Week	Rate	Rating								
Week:		10/01/18	10/07/18	--WTF--	1	$100.00	0.00								
												Totals		57	$50,175.00

EXHIBIT P

NAB Form PB-18 Candidates

AGREEMENT FORM FOR POLITICAL CANDIDATE ADVERTISEMENTS

(check applicable box)

■ **FEDERAL CANDIDATE** ☐ **STATE/LOCAL CANDIDATE**

To Avail Themselves Of The Lowest Unit Charge During A Political Window, Federal Candidates Must Sign The Certification On Page 3

Station and Location:	**Date:**

I, American Media & Advocacy Group,

being/on behalf of: Josh Hawley for Senate,

a legally qualified candidate of the Republican

political party for the office of: U.S. Senate

in the Primary Election

election to be held on: August 7th, 2018

do hereby request station time as follows:

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

Attach proposed schedule with charges (if available):

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

NAB Form PB-18 Candidates

I represent that the payment for the above described broadcast time has been furnished by:

American Media & Advocacy Group

and you are authorized to announce the time as paid for by such person or entity. I represent that this person or entity is either a legally qualified candidate or an authorized committee/organization of the legally qualified candidate.

The name of the treasurer of the candidate's authorized committee is:

Salvatore Purpura

This station has disclosed to me its political advertising policies, including: applicable classes and rates; and discount, promotional and other sales practices (not applicable to federal candidates).

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

To Be Signed By Candidate or Authorized Committee

Date	Signature

To Be Signed By Station Representative

☒ Accepted	☐ Accepted In Part	☐ Rejected
Chris Scott	Chris Scott	NSM
Signature	Printed Name	Title

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

NAB Form PB-18 Candidates

FEDERAL CANDIDATE CERTIFICATION

In Order For Federal Candidates To Receive The Lowest Unit Charge During A Political Window, The Following Certification Is Required:

I, American Media & Advocacy Group
(name of federal candidate or authorized committee) hereby certify that the programming to be broadcast (in whole or in part) pursuant to this agreement:

☐ **does** ☐ **does not**

refer to an opposing candidate (check applicable box). I further certify that for the programming that does refer to an opposing candidate:

(check applicable box)

☐ the radio programming contains a personal audio statement by the candidate that identifies the candidate, the office being sought, and that the candidate has approved the broadcast.

☐ the television programming contains a clearly identifiable photograph or similar image of the candidate for a duration of at least four seconds, and a simultaneously displayed printed statement identifying the candidate, that the candidate approved the broadcast, and that the candidate and/or the candidate's authorized committee paid for the broadcast.

Jon Ferrell, agent for Just Family for Senate

signature of candidate or authorized committee

printed name **date**

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

AGREED UPON SCHEDULE

(TO BE FILLED IN ONLY IF STATION DOES NOT ACCEPT ALL OF CANDIDATE'S REQUEST)

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 times the spots air and the rates charged, 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 specific spots aired and the rates charged. 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.

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

EXHIBIT Q

NAB Form PB-18 Candidates

AGREEMENT FORM FOR POLITICAL CANDIDATE ADVERTISEMENTS

(check applicable box)

☒ **FEDERAL CANDIDATE** ☐ **STATE/LOCAL CANDIDATE**

To Avail Themselves Of The Lowest Unit Charge During A Political Window, Federal Candidates Must Sign The Certification On Page 3

Station and Location:	**Date:**
KYYN Springfield, MO	9-6-18

I, American Media & Advocacy Group,

being/on behalf of: Josh Hawley for Senate/NRSC,

a legally qualified candidate of the Republican

political party for the office of: U.S. Senate

in the General Election

election to be held on: November 6th, 2018

do hereby request station time as follows:

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

Attach proposed schedule with charges (if available):

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

NAB Form PB-18 Candidates

I represent that the payment for the above described broadcast time has been furnished by:

American Media & Advocacy Group

and you are authorized to announce the time as paid for by such person or entity. I represent that this person or entity is either a legally qualified candidate or an authorized committee/organization of the legally qualified candidate.

The name of the treasurer of the candidate's authorized committee is:

Salvatore Purpura

This station has disclosed to me its political advertising policies, including: applicable classes and rates; and discount, promotional and other sales practices (not applicable to federal candidates).

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

To Be Signed By Candidate or Authorized Committee

Date	Signature

To Be Signed By Station Representative

☒ Accepted	☐ Accepted In Part	☐ Rejected
Natalie Murphy	Natalie Murphy	NRS
Signature	Printed Name	Title

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

NAB Form PB-18 Candidates

FEDERAL CANDIDATE CERTIFICATION

In Order For Federal Candidates To Receive The Lowest Unit Charge During A Political Window, The Following Certification Is Required:

I, American Media & Advocacy Group
(name of federal candidate or authorized committee) hereby certify that the programming to be broadcast (in whole or in part) pursuant to this agreement:

☐ **does** ☐ **does not**

refer to an opposing candidate (check applicable box). I further certify that for the programming that does refer to an opposing candidate:

(check applicable box)

☐ the radio programming contains a personal audio statement by the candidate that identifies the candidate, the office being sought, and that the candidate has approved the broadcast.

☐ the television programming contains a clearly identifiable photograph or similar image of the candidate for a duration of at least four seconds, and a simultaneously displayed printed statement identifying the candidate, that the candidate approved the broadcast, and that the candidate and/or the candidate's authorized committee paid for the broadcast.

Jon R Ferrell, agent for Josh Hawley for Senate/Inc

signature of candidate or authorized committee

JONATHAN FERRELL

printed name **date**

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed

AGREED UPON SCHEDULE

(TO BE FILLED IN ONLY IF STATION DOES NOT ACCEPT ALL OF CANDIDATE'S REQUEST)

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 times the spots air and the rates charged, 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 specific spots aired and the rates charged. 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.

Copyright © 2013 by the National Association of Broadcasters. May not be copied, reproduced or further distributed