BEFORE THE FEDERAL ELECTION COMMISSION

2018 DEC -7

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

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NATIONAL RIFLE ASSOCIATION OF AMERICA INSTITUTE FOR LEGISLATIVE ACTION Mary Rose Adkins, Treasurer 11250 Waples Mill Road Fairfax, VA 22030

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

COMPLAINT

- 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 Institute for Legislative Action ("NRA-ILA") (ID: C90013301) and the National Rifle Association of America Political Victory Fund ("NRA-PVF") (ID:C00053553) have violated the Federal Election Campaign Act ("FECA"), 52 U.S.C. § 30101, *et seq*.
- During the 2016 election cycle, the NRA-ILA and NRA-PVF together spent over \$25 million on independent expenditures supporting Trump, and distributed and placed those advertisements using the same employees that were placing Donald J. Trump for President,

Inc.'s own advertisements. Specifically, according to records on file with the Federal Communication Commission, the NRA-ILA and NRA-PVF placed pro-Trump ads using the firm Red Eagle Media Group ("Rcd Eagle"), which is a trade name for a firm called National Media Research, Planning and Placement ("National Media"), and the Trump campaign placed ads using the firm American Media & Advocacy Group ("AMAG"), which is located at the same address as Red Eagle/National Media and has the same registered agent and the same employees. In the final stretch of the 2016 election, four high-ranking National Media employees repeatedly placed ads on behalf of both the NRA and the Trump campaign, in some cases on the same stations or programs, thereby ensuring that spending by both the NRA and the Trump campaign would be complementary and advance a unified, coordinated election strategy.

- 3. As a result, there is reason to believe that the NRA-ILA and NRA-PVF made illegal, unreported, and excessive in-kind contributions to Donald J. Trump for President, Inc. 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.

2

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 gunviolence-prevention laws. Giffords opposed candidate Trump in his 2016 campaign.² Congresswoman Giffords and Captain Kelly endorsed candidate Trump's general election opponent.

FACTS

- Donald Trump was a candidate for president in the 2016 election. His designated presidential campaign committee is Donald J. Trump for President, Inc. (I.D. C00580100).³
- 8. The NRA-ILA is a tax-exempt organization under Section 501(c)(4) of the Internal Revenue Code that describes itself as "the 'lobbying' arm of the NRA."⁴ It reports independent expenditures to the Commission.⁵ In the 2016 election cycle, it reported approximately \$21.1

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 Donald J. Trump for President, Inc., Statement of Organization, FEC Form 1, at 1 (amended Jan. 20, 2017), http://docquery.fec.gov/pdf/839/201701209041435839/201701209041435839.pdf.

⁴ NATIONAL RIFLE ASSOCIATION INSTITUTE FOR LEGISLATIVE ACTION, <u>https://www.nraila.org/</u> (last visited Dec. 4, 2018).

⁵ National Rifle Association Institute for Legislative Action, Financial Summary, 2015-16, https://www.fec.gov/data/committee/C90013301/?cycle=2016.

million in independent expenditures supporting Trump or opposing his opponent, Hillary Clinton.⁶

- 9. The NRA-PVF is the National Rifle Association of America's lobbyist/registrant PAC.⁷ In the 2016 cycle it reported approximately \$9.31 million in independent expenditures supporting Trump or opposing Clinton.⁸
- 10. On December 7, 2018, *Mother Jones* and *The Trace* reported that during the 2016 elections, the NRA-ILA and NRA-PVF placed independent expenditures supporting Trump through a network of consulting firms also employed by Donald J. Trump for President, Inc.⁹ Specifically, the firm Red Eagle placed the NRA-PVF and NRA-ILA television ads supporting Trump, and the Trump campaign placed ads using American Media & Advocacy Group ("AMAG"); as described *infra* ¶¶13-16, both entities are functionally indistinguishable from the media strategy firm National Media, and employ the same officials. The article noted that the Trump campaign's ads "were aimed at precisely the same demographic as the NRA spots, and often ran during the same shows": During the last week of October, for instance, Red Eagle bought \$36,250 worth of ads

on the ABC affiliate in Cleveland, Ohio, on behalf of the NRA. A form the NRA filed with the station described spots mentioning the Second Amendment, Hillary Clinton, and the 2016 presidential election.

At the same time, AMAG spent almost the exact same amount — \$36,150 — on a series of Trump campaign ads on the same Cleveland station during the same week.

⁶ National Rifle Association Institute for Legislative Action, Spending, 2015-16, <u>https://www.fec.gov/data/committee/C90013301/?cycle=2016&tab=spending</u> (describing \$12,307,930 in independent expenditures opposing Clinton and \$8,778,720 in independent expenditures supporting Trump).

 ⁷ National Rifle Association of America Political Victory Fund, Statement of Organization, FEC Form 1, at
 2, 3 (amended Sept. 5, 2018), <u>http://docquery.fec.gov/pdf/507/201809059121558507/201809059121558507.pdf</u>.
 ⁸ National Rifle Association Political Victory Fund, Spending, 2015-16,

https://www.fec.gov/data/committee/C00053553/?cycle=2016&tab=spending (describing \$7,448,184 in independent expenditures opposing Clinton and \$1,865,453 in independent expenditures supporting Trump).

⁹ Mike Spies, *Documents Point to Illegal Campaign Coordination Between Trump and the NRA*, MOTHER JONES (Dec. 6, 2018), <u>https://www.motherjones.com/politics/2018/12/nra-trump-2016-campaign-coordination-political-advertising/</u>.

Both the NRA ads and the Trump ads aired during many of the same programs, including local newscasts, Good Morning America, and NCAA football.¹⁰

11. The article noted that Ben Angle, a senior buyer at National Media, has been a proponent of

sports as a way to reach conservative audiences, and had previously stated that "Every time

we assist a Republican candidate, we advise him to advertise at sports events":

On September 15, for instance, Red Eagle executed an \$86,000 deal for the NRA with Raycom Sports Network, a syndicator of sports programs, for slots during seven ACC college football games airing during the final weeks of the presidential race Less than a week later, another National Media staffer authorized virtually the same purchase for Trump.¹¹

12. Additionally, the article continued:

Effectively placing ads is among the most important tasks in getting a candidate elected to office. "The creative content is only part of the equation," Rick Wilson, a Republican media strategist, said. "Political advertising relies on smart media placement at every stage. Anything else and you might as well just throw your money in a bonfire."¹²

13. "National Media" describes itself as "a nationally recognized leader in media research,

planning, and placement" that "work[s] with [its] clients to develop and execute research-

based, targeted, and efficient media plans"; its website lists examples of its work, the names

and titles of approximately 20 employees, and a contact address of 817 Slaters Lane,

Alexandria, VA, 22314.¹³ According to Virginia Corporation Commission filings, National

Media uses the address 815 Slaters Lane, Alexandria, VA, 22314, and its registered agent is

¹⁰ *Id*.

 $[\]begin{array}{ccc} 11 & Id. \\ 12 & Id \end{array}$

I2 Id.

¹³ NATIONAL MEDIA, <u>www.natmedia.com</u> (last visited Dec. 6, 2018).

Joel L. Dahnke.¹⁴ Dahnke is a Virginia-based lawyer who highlights National Media on his website's list of "representative clients."¹⁵

14. 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.¹⁶ 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 often identified after a person's true name with the abbreviation "t/a" ("trading as"), "dba" ("doing business as"), or "aka" ("also known as").¹⁷

15. Records on file with the Federal Communications Commission ("FCC") indicate that Red Eagle placed the NRA-ILA and NRA-PVF ads supporting Trump or attacking his opponent in the 2016 presidential race, using the address 815 Slaters Lane, Alexandria, VA, 22314.¹⁸ It appears that Red Eagle was subcontracted by the consulting firm Starboard Strategic, Inc. ("Starboard"), to which the NRA-ILA and NRA-PVF paid more than \$25 million for independent expenditures supporting Trump or attacking his opponent in the 2016

https://sccefile.scc.virginia.gov/Find/Business?SearchTerm=red+eagle+media&SearchPattern=K&as_fid=71a314ab 0f8a83563c7a4633b7f34602942d6fb4 (last visited Dec. 7, 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 Dec. 7, 2018).

¹⁴ National Media Research Planning and Placement, LLC, Commonwealth of Virginia State Corporation Commission, <u>https://sccefile.scc.virginia.gov/Business/S207052</u> (last visited Dec. 4, 2018).

¹⁵ *Representative Clients*, Joel L. Dahnke, Esquire PLC, <u>http://www.dahnkelaw.com/styled-7/</u> (last visited Dec. 4, 2018).

¹⁶ 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,

¹⁷ Frequently Asked Questions: Fictitious Names, Commonwealth of Virginia State Corporation Commission, http://www.scc.virginia.gov/clk/befaq/fict.aspx (last visited Dec. 7, 2018).

¹⁸ See, e.g., Exhibit E at 1.

presidential race.¹⁹ (The NRA-PVF's and NRA-ILA's reports filed with the Commission do not reflect direct payments to Red Eagle.²⁰) Reporting by *POLITICO* and previous CLC complaints describe how Starboard is functionally indistinguishable from the political consulting firm OnMessage, whose Alexandria, Virginia office is also located at 815 Slaters Lane.²¹ The NRA-ILA paid Starboard at OnMessage's Alexandria, VA address, 817 Slaters Lane; the NRA-PVF paid Starboard at OnMessage's Annapolis, MD address, 705 Melvin Ave. #105.²²

According to Virginia Corporation Commission records, American Media & Advocacy
 Group, LLC ("AMAG") has a principal office at the same address as National Media and
 Red Eagle, 815 Slaters Lane, Alexandria, VA, 22314.²³ Its registered agent is Joel L.
 Dahnke, who is also National Media's registered agent.²⁴ In a 2016 *Daily Beast* article, a

¹⁹ See NRA-PVF and NRA-ILA, Independent expenditures mentioning candidates Trump or Clinton paid to Starboard Strategic (regularly scheduled reports), FEC.gov <u>https://www.fec.gov/data/independent-</u> expenditures/?data_type=processed&committee_id=C00053553&committee_id=C90013301&is_notice=false&cand idate_id=P00003392&candidate_id=P80001571&payee_name=starboard.

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, <u>https://www.fec.gov/data/independentexpenditures/?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).</u>

²¹ See 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 generally Campaign Legal Center, Complaint Against the NRA-PVF and Josh Hawley for Senate (Oct. 22, 2018), https://campaignlegal.org/sites/default/files/2018-10/10-22-18%20NRA%20Hawley%20Complaint%20%28final%29.pdf.

18%20NRA%20Hawley%20Complaint%20%28final%29.pdf.

²² See NRA-PVF and NRA-ILA, supra note 19. This practice follows the NRA-ILA's and NRA-PVF's practices in past cycles—namely, to report expenditures to Starboard, which is associated with both addresses—at its Alexandria and Annapolis addresses, which are also both linked to another Starboard alter ego, OnMessage. See generally Campaign Legal Center, Complaint Against the NRA-PVF and Josh Hawley for Senate (Oct. 22, 2018), https://campaignlegal.org/sites/default/files/2018-10/10-22-

²³ American Media & Advocacy Group, LLC, Commonwealth of Virginia State Corporation Commission, https://sccefile.scc.virginia.gov/Business/S416256 (last visited Dec. 4, 2018).

⁴ *Id*.

lawyer for National Media and AMAG "confirmed" that the two entities are "affiliated" but "didn't detail the nature of their relationship."²⁵

- According to reports filed with the Commission, Donald J. Trump for President, Inc. paid
 \$74.2 million to AMAG for "placed media" in the 2016 cycle.²⁶ Records filed with the FCC also reflect that AMAG placed the Trump campaign's advertisements in the 2016 cycle.²⁷
- 18. According to records filed with the FCC, during the 2016 cycle, at least four National Media employees placed the NRA-ILA's and NRA-PVF's pro-Trump ads as "Red Eagle" employees, and also placed Donald J. Trump for President, Inc.'s ads as "AMAG" employees. Those employees were:
 - a) Ben Angle, who is described on National Media's website as a "senior media buyer" who "strategically place[s] efficient and effective media buys," and "has helped national media develop strategies to combat the challenges of the online public file by identifying new ways to negotiate with stations on placement and location."²⁸ In the 2018 book *Inside Campaigns: Elections through the Eyes of Political Professionals*, Angle is described as an architect of the Trump campaign's television advertising strategy. "In mid-September," the book says, "Angle and his boss were summoned to Trump Tower and told their firm would

https://www.fec.gov/data/disbursements/?two_year_transaction_period=2016&data_type=processed&committee_id =C00580100&recipient_name=american+media&recipient_name=amag&min_date=01%2F01%2F2015&max_date =12%2F31%2F2016 (last visited Dec. 3, 2018). The address at which the Trump campaign paid AMAG was 817 Slaters Lane, Alexandria, Virginia, 22314. See, e.g., Donald J. Trump for President, Inc., Post-General 2016, FEC Form 3, at 46745 (amended May 12, 2017), http://docquery.fec.gov/cgi-bin/fecimg/?201705129053687680.

²⁷ See, e.g., Exhibit M at 1, 4.

²⁵ Betsy Woodruff, *Trump's Already Part of the D.C. Swamp, Whether He Knows It or Not*, DAILY BEAST (Oct. 26, 2016), <u>https://www.thedailybeast.com/trumps-already-part-of-the-dc-swamp-whether-he-knows-it-or-not?ref=scroll</u>.

²⁶ Donald J. Trump for President, Inc., Disbursements to American Media & Advocacy Group, 2015-16, FEC.GOV,

²⁸ NATIONAL MEDIA, *supra* note 13. (Attached as Exhibit A.)

be placing all of the Trump campaign's television advertising during the last seven weeks of the campaign."²⁹

- b) Kristy Kovatch, who is described on National Media's website as a "senior media buyer" who "specializes in television media buying for political candidates, issue/advocacy groups and public affairs clients."³⁰
- c) Jon Ferrell, who is described on National Media's website as National Media's "director of accounting," in a profile that emphasizes that Ferrell "ensures that every penny allocated for media is spent according to election laws."³¹
- d) Caroline Kowalski, whose LinkedIn page identifies her as a former "media specialist" at National Media from March 2016 until May 2017.³² On LinkedIn, Kowalski emphasizes that she "[a]cted as liaison between media buyers and TV, radio, and cable networks" and "[r]esearched voter demographic data to help create national, statewide and local advertising campaigns for Presidential, senatorial, and congressional candidates, issue-advocacy groups, and PACs," among other duties.³³
- On May 24, 2016, Kovatch appeared as Red Eagle's contact person on a Station Issue Advertising Request Sheet for a flight of NRA-PVF ads mentioning "Hillary Clinton" and pertaining to the "Presidential General Election 11/8/16."³⁴

²⁹ WILLIAM J. FELTUS, KENNETH M. GOLDSTEIN, & MATTHEW DALLEK, INSIDE CAMPAIGNS: ELECTIONS THROUGH THE EYES OF POLITICAL PROFESSIONALS 115 (2d ed. 2018); see also Spies, supra note 9.

³⁰ Id. (Attached as Exhibit B.)

³¹ *Id.* (Attached as Exhibit C.)

 ³² Caroline Kowalski, LINKEDIN, <u>https://www.linkedin.com/in/caroline-kowalski-8b98a546/</u> (last visited Dec.
 3, 2018). (Attached as Exhibit D.)

³³ *Id*.

³⁴ Exhibit E at 1.

- On June 28, 2016, Angle was listed as a Red Eagle representative for a Political Inquiry 20. Form for NRA-PVF ads labeled "Anti-Clinton (D)" and "Pro-Trump (R)."35 The next day, on June 29, 2016, USA Today reported that the NRA-PVF "is launching its first ad campaign of the 2016 presidential race" with an anti-Clinton ad focused on Benghazi.³⁶
- In its reporting on this new ad a few days later, the New York Times described the NRA as 21. "coming to the rescue" with an ad buy that would "provide air cover for Mr. Trump's campaign in June and early July" and that also provided "desperately needed television presence on behalf of the Trump campaign, which spent nothing in June in battleground states."37 The New York Times further noted that the message of the ad did not pertain to gun rights or the Second Amendment; rather, it criticized Clinton for the Benghazi incident, "an unusual tactic for the interest group" that would appear to have the group "playing a role often filled by 'super PACs' aligned with candidates."38
- On July 11, 2016, Ferrell signed an agreement form on behalf of the NRA-PVF and Red 22. Eagle for ads pertaining to the "2016 Presidential Election, 11/8/2016 Hillary Clinton & Donald Trump."³⁹
- On August 5, 2016, Ferrell signed another agreement form on behalf of the NRA-PVF and 23. Red Eagle related to "Hillary Clinton for U.S. President, Nov. 8, 2016 General Election, Gun Control" and slated to run August 8 through August 14, 2016.40

³⁵ Exhibit F at 1.

Donovan Slack, Exclusive: NRA to run \$2 million Benghazi-themed ad campaign for Trump, USA TODAY 36 (June 29, 2016), https://www.usatoday.com/story/news/politics/elections/2016/06/29/nra-2-million-ad-campaigntrump-benghazi/86484306/.

Nick Corasaniti, NRA Comes to Rescue of Donald Trump With Ad, N.Y. TIMES (July 3, 2016), https://www.nytimes.com/2016/07/03/us/politics/nra-comes-to-rescue-of-donald-trump-with-ad.html.

Id. 39

Exhibit G at 2-4. 40

Exhibit H at 1-2, 4.

- On August 9, 2016, USA Today reported that the NRA-PVF had released a new ad attacking Clinton in an ad buy costing \$3 million.⁴¹ The ad's voiceover said, among other things:
 "Protected by armed guards for thirty years. But she doesn't believe in your right to keep a gun at home for self-defense."⁴² USA Today also noted that "[t]he ad was released the same day that Trump drew fire for suggesting that 'Second Amendment people' could stop Clinton."⁴³
- 25. On an August 11, 2016 "traffic instructions" document for an NRA-PVF ad purchase on a Florida station, **Kowalski** is the Red Eagle contact, with a @redeagleteam.com email address.⁴⁴ **Ferrell** signed a check paid to the station, and signed an agreement form.⁴⁵ The instructions do not state whether they relate to a Trump/Clinton ad, but searching for one of the ID numbers listed on the traffic instructions⁴⁶ shows that that same ID number is associated with the NRA-PVF's "Hillary Will Leave You Defenseless" ad,⁴⁷ also called "Jet."⁴⁸
- 26. On August 16, 2016, *POLITICO* reported that the Trump campaign would be launching its "first barrage of television ads in the battleground states starting this Friday [August 29,

Eliza Collins, NRA launches \$3 million anti-Clinton ad buy, USA TODAY (Aug. 9, 2016),
 https://www.usatoday.com/story/news/politics/2016/08/09/nra-ad-hillary-clinton-trump/88489624/.
 Id.

⁴³ Id.

⁴⁴ Exhibit I at 14.

⁴⁵ *Id.* at 11, 15.

⁴⁶ See id. (showing ID # NRATV080316H, with accompanying instructions to run the ad with that ID number beginning August 12, 2016).

Hillary Will Leave You Defenseless, NRA-PVF (Aug. 10, 2016),

https://www.nrapvf.org/media/20160810/video/nratv080316h-ytmp4 (showing the identifier "nratv080316h" in the URL).

⁴⁸ This is one of the ads OnMessage features on its website as producing for the NRA. *Our Work: Jet*, OnMessage, Inc., <u>https://onmessageinc.com/our-work/jet/</u> (last visited July 16, 2018). The disclaimer at the end of "Jet" states it was paid for by the NRA-ILA, but an otherwise identical version of the ad stated it was paid for by NRA-PVF. *See* Collins, *supra* note 41.

2016].^{**49} The report noted that these ads came "[m]ore than 100 days after he became the presumptive Republican nominee and with fewer than 90 days until the election," and that, to that point in the campaign, "Trump ha[d] been buoyed by ads from the National Rifle Association and two super PACs.^{**50}

- 27. On a September 16, 2016 NBC/Telemundo Political Inquiry Record, Kovatch appeared as AMAG's contact person purchasing the ads on behalf of "Donald Trump, RNC/Trump for President."⁵¹
- On a Station Issue Advertising Request Sheet dated three days later, September 19, 2016,
 Kovatch also appeared as Red Eagle's contact person for a flight of NRA-ILA ads
 mentioning Clinton and Trump and pertaining to the 2016 presidential election.⁵²
- 29. The next day, on September 20, 2016, *CNN* reported, "The NRA is launching a \$5 million TV ad campaign Tuesday [September 20, 2016], the group says, meant to turn out pro-Second Amendment voters at a time when Trump is being attacked for his language about firearms."⁵³ *CNN* further reported:

The NRA's Political Victory Fund is tasked with spending half the money on five swing states -- Ohio, Nevada, Virginia, North Carolina and Pennsylvania -- while its Institute for Legislative Action, its lobbying arm, is spending the second-half on national cable. All of the money is going to a harrowing ad that shows what the NRA says would happen if Hillary Clinton appoints her chosen justices to the Supreme Court.⁵⁴

30. The article included an embedded copy of the ad itself, titled "Don't Let Hillary Clinton Leave You Defenseless," which the NRA also posted to its YouTube channel that same

⁵⁰ Id.

⁵⁴ Id.

⁴⁹ Shane Goldmacher, *Trump campaign to air first TV ads starting Friday*, POLITICO (Aug. 16, 2016), https://www.politico.com/story/2016/08/donald-trump-tv-ads-227092.

⁵¹ Exhibit J at 1.

⁵² Exhibit K at 1.

⁵³ Theodore Schleifer, *NRA returns to Trump's defense with \$5 million ad buy*, CNN (Sept. 20, 2016), https://www.cnn.com/2016/09/20/politics/nra-donald-trump-television/index.html.

day.55 Also on September 20, 2016, the NRA-ILA issued a press release announcing the NRA's "most expensive ad buy to date" that "underscores what's at stake for the Second Amendment if Hillary Clinton is elected president."56 That press release called the ad "Nightstand" and linked to the same video on YouTube, where it was titled "Don't Let Hillary Clinton Leave You Defenseless."57

- On September 15, 2016, Red Eagle placed \$101,200 in NRA-ILA campaign ads on the 31. Raycom Sports Network, a syndicator of sports programming, for seven college football games in September, October, and November 2016.58 Ferrell signed the accompanying agreement form.⁵⁹ The NRA-ILA ads identified on the schedule were "Nightstand,"⁶⁰ "Kristi,"⁶¹ and "Classified,"⁶² all of which opposed Clinton.
- Five days later, on September 20, 2016, AMAG placed \$30,000 in Donald J. Trump for 32. President, Inc. ads on Raycom Sports Network, with the ads slated to run during six football

See NRA, Don't Let Hillary Clinton Leave You Defenseless, YOUTUBE (published Sept. 20, 2016), 55 https://www.youtube.com/watch?time_continue=28&v=hPM8e_DauUw.

Press Release, NRA-ILA, NRA Launches 4th Trump Ad in Presidential Election Cycle (Sept. 20, 2016), https://www.nraila.org/articles/20160920/nra-launches-4th-trump-ad-in-presidential-election-cycle.

Id. OnMessage, Starboard's alter ego, OnMessage, won awards for this ad. See Brad Todd, Two NRA Presidential Ads in Running for Top Reed Award, ONMESSAGE, INC. (Jan. 20, 2017),

https://onmessageinc.com/blog/012017/ (last visited Dec. 7, 2018). See also 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; Guy Harrison, OnMessage Wins Five Pollie Awards for TV and Digital Work, ONMESSAGE, INC. (Mar. 20, 2017), https://onmessageinc.com/blog/03202017/ (last visited Dec. 7, 2018).

Exhibit L at 5-6.

⁵⁹ Id. at 3.

See Press Release, NRA-ILA (Sept. 20, 2016), supra note 56. According to the Raycom schedule, this ad 60 was slated to run on that station on September 24, 2016 and October 1, 2016.

This ad, slated to run on Raycom Sports on October 8 and October 15, appears to correspond to the NRA's "Kristi's Story" ad, first announced October 5, 2016 and also referred to simply as "Kristi." See Press Release, NRA-ILA, NRA's Largest Trump Ad Buy (Oct. 5, 2016), https://www.nraila.org/articles/20161005/nras-largesttrump-ad-buy-featuring-armed-citizen-kristi-mcmains.

See Press Release, NRA-ILA, NRA Launches New Ad Emphasizing Importance of Supreme Court in Presidential Election (Oct. 20, 2016), https://www.nraila.org/articles/20161020/nra-launches-new-ad-emphasizingimportance-of-supreme-court-in-presidential-election.

games, with Angle listed as AMAG's contact on the accompanying invoice.⁶³ Six separate

Trump campaign ads were named on the attached schedule,⁶⁴ slated to run between

September 24 and November 5. The ads named correspond to records of Trump campaign

ads in New Republic's 2016 political ad collection: "Movement,"65 "Why,"66 "Change,"67

"Laura."68 "Corruption."69 and "Choice."70

Five AMAG-placed Trump campaign ads and five Red Eagle-placed NRA-ILA ads were 33.

slated to appear the same afternoons, on the same stations, and during the same five games.⁷¹

As *Mother Jones/The Trace* reported:

The purchases were mirror images of each other. In five of the games, both the NRA and Trump bought ads. When the NRA ran two spots either attacking Clinton or promoting Trump, the Trump campaign ran just one. And when the Trump campaign ran two spots, the NRA ran one. The pattern even persisted when there was no direct overlap: In the two

https://newrepublic.com/political-ad-database/donald-trump-why/OS8zMC8xNjpXaHk (showing a Trump campaign ad named "Why" opposing Clinton with an initial air date of September 30, 2016; the Raycom Sports schedule showed it was scheduled to air on that station shortly thereafter, on October 1 and October 8, 2016).

Donald J. Trump for President, Donald Trump: Change, THE NEW REPUBLIC (aired Oct. 18, 2016), 67 https://newrepublic.com/political-ad-database/donald-trump-change/MTAvMTgvMTY6Q2hhbmdl (showing a Trump campaign ad both advocating for Trump and opposing Clinton named "Change" with an initial air date of October 18, 2016; the Raycom Sports schedule showed it scheduled to air on that station shortly thereafter, on October 29, 2016).

Donald J. Trump for President, Donald Trump: Laura, THE NEW REPUBLIC (aired Oct. 19, 2016), 68 https://newrepublic.com/political-ad-database/donald-trump-laura/MTAvMTkvMTY6TGF1cmE (showing a Trump campaign ad named "Laura" opposing Clinton with an initial air date of October 19, 2016; the Raycom Sports schedule showed it was scheduled to air on that station shortly thereafter, on October 29, 2016).

⁶³ Exhibit M at 4-5.

⁶⁴ *Id.* at 5.

Donald J. Trump for President, Donald Trump: Movement, THE NEW REPUBLIC (aired Sept. 20, 2016), 65 https://newrepublic.com/political-ad-database/donald-trump-movement/OS8yMC8xNjpNb3ZlbWVudA (showing a Trump campaign ad advocating for Trump named "Why" with an initial air date of September 20, 2016; the Raycom Sports schedule showed it was scheduled to air on that station shortly thereafter, on September 24, 2016). Donald J. Trump for President, Donald Trump: Why, THE NEW REPUBLIC (aired Sept. 30, 2016),

Donald J. Trump for President, Donald Trump: Corruption, THE NEW REPUBLIC (aired Nov. 2, 2016), 69 https://newrepublic.com/political-ad-database/donald-trump-corruption/MTEvMi8xNjpDb3JydXB0aW9u (showing a Trump campaign ad opposing Clinton named "Corruption" with an initial air date of November 2, 2016; the Raycom Sports schedule showed it was scheduled to air on that station shortly thereafter, on November 5, 2016).

Donald J. Trump for President, Donald Trump: Choice, THE NEW REPUBLIC (aired Nov. 1, 2016), https://newrepublic.com/political-ad-database/donald-trump-choice/MTEvMS8xNjpDaG9pY2U (showing a Trump campaign ad both opposing Clinton and advocating for Trump named "Choice" with an initial air date of November 1, 2016; the Raycom Sports schedule showed it was scheduled to air on that station shortly thereafter, on November 5, 2016). 71

Compare Exhibit M at 4-5, with Exhibit L at 5-6.

games the Trump campaign sat out, the NRA ran two ads. And in the one game where the NRA didn't buy time, Trump bought two slots. Side by side, the spots aired across the country, on as many as 120 stations, according to data provided by Raycom.

After reviewing the Raycom records, [Republican media strategist Rick] Wilson said the pattern suggests that the purchases were part of a unified strategy by the NRA and the Trump campaign. "Sometimes you want to maximize the lowest unit rate on the campaign side," Wilson said. "But you still need more fire on the target. This is why the FEC says coordination is illegal."⁷²

- 34. On a document dated September 28, 2016, Kowalski was listed as the AMAG contact for advertisements purchased on behalf of Donald J. Trump for President, Inc., where she was listed with an "@americanmediaag.com" email address.⁷³ The "traffic instructions" document for this ad buy is printed on AMAG letterhead, and very closely resembles the Red Eagle "traffic instructions" document dated August 11, 2016 and also listing Kowalski; while ostensibly coming from different entities, both are formatted identically, both list Kowalski, and both list the same mailing address, phone number, and fax number in the header.⁷⁴
- 35. On October 4, 2016, Ferrell signed a Trump campaign/AMAG agreement form as an "agent for Donald J. Trump for President, Inc."⁷⁵
- 36. On October 5, 2016, the NRA-ILA announced the launch of "a \$6.5 million ad buy in support of Donald Trump for President, its largest of the 2016 election cycle" with an ad called "Kristi" that "illustrates [the] consequences of an anti-second amendment president."⁷⁶ CBS News reported that the "organization is more aggressively targeting undecided voters" than in previous cycles. ⁷⁷ An NRA spokeswoman said that "[w]e've done our advertising a

⁷² Spies, *supra* note 9.

⁷³ Exhibit N at 1.

⁷⁴ *Compare id.*, *with* Exhibit I at 14.

⁷⁵ Exhibit O at 3.

⁷⁶ Press Release, NRA-ILA (Oct. 5, 2016), *supra* note 61.

⁷⁷ Reena Flores, *NRA pushes Donald Trump with biggest TV ad buy to date*, CBS NEws (Oct. 5, 2016), https://www.cbsnews.com/news/nra-pushes-donald-trump-with-biggest-tv-ad-buy-to-date/.

little bit different than in the past" and "we've really tried to touch voters outside of that group who may be on the fence" because "we are the only group that has done sustained and significant advertising on behalf of Trump."⁷⁸

37. On an October 14, 2016 Station Issue Advertising Request Sheet for NRA-ILA ads mentioning Clinton, Trump, and the 2016 General Election, Angle is listed as Red Eagle's contact person.⁷⁹

38. On October 19, 2016, POLITICO reported on a new NRA ad buy attacking Clinton:

The National Rifle Association is out with one of its hardest hits on Hillary Clinton yet, just in time for the last debate on Wednesday evening, accusing her of lying repeatedly. The gun rights group is spending \$5 million on broadcasts in Ohio, North Carolina, Pennsylvania and Virginia, as well as national cable, through Oct. 31. It brings the NRA's total television spending in support of Donald Trump up to around \$22 million.

NRA spokeswoman Jennifer Baker said the group expects Clinton once again to say during the debate that she respects gun rights, which the group will seize on to further promote the ad on social media.⁸⁰

This ad, called "Classified," attacked Clinton about her emails and about her views on the

Second Amendment.⁸¹

39. On October 19, 2016, Ferrell signed on behalf of Red Eagle and the NRA-PVF for a "pro-

Trump anti-Clinton" ad buy on the Norfolk, VA ABC affiliate, WVEC.⁸² The ads were

scheduled to run from October 25 to October 31, 2016.⁸³

⁸² Exhibit Q at 5-8.

⁸³ *Id.* at 1.

⁷⁸ Id.

⁷⁹ Exhibit P at 1.

⁸⁰ Sarah Wheaton, *New NRA ad calls Clinton a liar*, POLITICO (Oct. 19, 2016), https://www.politico.com/story/2016/10/nra-ad-clinton-liar-230012.

⁸¹ This is the same "Classified" ad that appeared on the September Raycom Sports schedule mentioned previously. *See* Exhibit L at 6; *see also* NRA-ILA, Press Release (Oct. 20, 2016), *supra* note 62. The on-ad disclaimer says it was paid for by the NRA-ILA. *Id*.

- Five days later, on October 24, 2016, Ferrell signed on behalf of AMAG and Donald J.
 Trump for President, Inc. for "pro-Trump anti-Clinton" ads on the same Norfolk, VA
 station."⁸⁴ The ads were scheduled to run from October 25 to October 31, 2016.⁸⁵
- 41. On October 25, 2016, the NRA's YouTube channel posted a new anti-Clinton ad focused on the Supreme Court and titled "Four Justices."⁸⁶
- 42. On a Station Issue Advertising Request Sheet dated October 28, 2016, for an NRA-PVF ad flight described as "anti-Clinton anti-Murphy," **Kowalski** was listed as Red Eagle's contact person.⁸⁷
- 43. On a November 3, 2016 contract for a Donald J. Trump for President, Inc. ad flight scheduled the first week of November, **Kovatch** was listed as the "buyer" for AMAG.⁸⁸
- 44. On a "traffic instructions" form, dated November 3, 2016, **Kowalski** appeared as AMAG's contact for Donald J. Trump for President, Inc. ads.⁸⁹ The same filing also showed Kovatch as an AMAG contact⁹⁰ and Ferrell as the signatory.⁹¹
- 45. On a November 4, 2016 CBS Political Inquiry Form for ads purchased by Donald J. Trump for President, Inc. and the Republican National Committee (RNC), Kovatch again appeared as AMAG's agency contact.⁹² On another CBS Political Inquiry Form dated November 4, 2016 for RNC/ Donald J. Trump for President, Inc. ads, Kowalski appeared as the agency

Exhibit R at 6-8.

⁸⁵ *Id.* at 1.

⁸⁶ NRA, *Four Justices*, YOUTUBE (published on Oct. 25, 2016), <u>https://www.youtube.com/watch?v=A3yO11-70gA</u>.

⁸⁷ Exhibit S at 1.

 ⁸⁸ Exhibit T at 13-16.
 ⁸⁹ Exhibit U at 8-9

⁸⁹ Exhibit U at 8-9. ⁹⁰ *Id* at 3

 $[\]frac{90}{91}$ *Id.* at 3.

 ⁹¹ *Id.* at 12-13.
 ⁹² Exhibit V at

⁹² Exhibit V at 1.

contact for AMAG.⁹³ Also on November 4, 2016, **Ferrell** signed an agreement form for presidential election ads placed by AMAG as an "agent of RNC/Trump for President."⁹⁴

SUMMARY OF THE LAW

- 46. Federal law limits to \$2,700 the amount of a contribution that a presidential candidate or his 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).
- 47. 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).
- 48. 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 charge) of any goods or services, including, but not limited to, "facilities, equipment, supplies, personnel, advertising services, membership lists, and mailing lists." *Id*.
- 49. 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).

⁹³ Exhibit W at 1.

⁹⁴ Exhibit X at 2, 3.

- 50. 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).⁹⁵
- 51. 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."⁹⁶ Those "coordinated communications" regulations are at 11 C.F.R. § 109.21.
- 52. 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 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).
- 53. 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).

⁹⁵ 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).

⁹⁶ 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).

54. The "conduct" standard is satisfied if the political committee paying for the communication (a) uses a commercial vendor⁹⁷ to create, produce, or distribute the communication⁹⁸ that (b) during the previous 120 days also provided certain services to the candidate identified in the communication or a political party committee,⁹⁹ 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,¹⁰⁰ 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."¹⁰¹

11 C.F.R. § 109.21(d)(4).¹⁰²

55. The Commission has stressed that "a commercial vendor may qualify as a common vendor under 11 C.F.R. § 109.21(d)(4) even after reorganizing or shifting personnel . . . [the rules] focus on the use or conveyance of information used by a vendor, including its owners, officers, and employees, in providing services to a candidate [or committee], rather than the particular structure of the vendor." Explanation & Justification, 68 Fed. Reg. 421, 435 (Jan.

⁹⁷ 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.*

⁹⁸ 11 C.F.R. § 109.21(d)(4)(i).

 $^{^{99}}$ 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.

¹⁰⁰ *Id.* § 109.21(d)(4)(ii)(A-I).

¹⁰¹ *Id.* § 109.21(d)(4)(iii).

¹⁰² 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 . . . [w]ithout some mechanism to ensure enforcement" does not "provide a *de facto* bar to the enforcement of the limits on coordinated communication imposed by Congress." 68 Fed. Reg. 421, 437 (Jan. 3, 2003).

3, 2003); *Cf.* MUR 5546 (Progress for America Voter Fund), General Counsel's Report #2 at 4 ("[t]he applicable rules defining common vendors emphasize substance over form; where entities . . . appear to be closely related, including possible overlapping personnel . . . their particular organizational form will not prevent an investigation of whether the entities used information in the same manner as a common vendor.").

The Commission has found reason to believe that FECA has been violated if the first two 56. 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);¹⁰³ see also MUR 5502 (Martinez for Senate), Notification with Factual and Legal Analysis at 8 (May 18, 2005).¹⁰⁴ 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).¹⁰⁵ 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

¹⁰³ Available at http://eqs.fec.gov/eqsdocsMUR/00005ABC.pdf.

¹⁰⁴ Available at http://eqs.fec.gov/eqsdocsMUR/000057D4.pdf.

¹⁰⁵ Available at http://eqs.fec.gov/eqsdocsMUR/0000615D.pdf.

used or conveyed to the political committee information about the candidates' plans, projects, activities, or needs. *Id.* at 12.

CAUSES OF ACTION

I. The NRA-ILA and NRA-PVF Made Excessive, Corporate, and Unreported In-Kind Contributions to Donald J. Trump for President, Inc.

- 57. There is reason to believe that the NRA-ILA and NRA-PVF violated the law by making millions of dollars in excessive, corporate, and unreported in-kind contributions to Donald J.
 Trump for President, Inc. in the form of coordinated communications.
- 58. An entity 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).
- 59. The NRA-ILA and NRA-PVF communications in support of Trump, and in opposition to his opponent, satisfy the "payment" prong because they were paid for in whole by the NRA-ILA and NRA-PVF. *Id.* § 109.21(a)(1).
- 60. The communications satisfy the "content" prong because they are public communications¹⁰⁶ that expressly advocated for the election of Trump and the defeat of his opponent. *Id.* § 109.21(c)(2).

¹⁰⁶ 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.

- 61. As described *infra* ¶¶62-64, 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 common vendors National Media/Red Eagle/AMAG, which selected and purchased the advertising slots and audiences.
- 62. "Red Eagle" is a trade name for the political consulting firm National Media, according to Virginia Corporation Commission records.¹⁰⁷ AMAG is "affiliated" with National Media, according to its attorney.¹⁰⁸ National Media, Red Eagle, and AMAG are located at the same "pair of adjacent brick buildings that share a parking lot"¹⁰⁹—815 and/or 817 Slaters Lane in Alexandria, Virginia, the same address(es) associated with Starboard/OnMessage¹¹⁰—and documents filed with the FCC by Red Eagle and AMAG are signed by National Media employees.¹¹¹
- 63. The NRA-ILA's and NRA-PVF's independent expenditures supporting Trump were placed by Red Eagle, and the relevant contracts and documents were signed by National Media employees.¹¹² Donald J. Trump for President, Inc. advertisements were placed by AMAG, and the relevant contracts and documents were signed by *those same* National Media employees. Moreover, the officials placing ads on behalf of both the NRA-ILA/NRA-PVF and the Trump campaign were not low-level employees serving administrative functions; they were senior officials with decades of experience tasked with providing the enumerated services described in the Commission's common vendor regulations, including the "selection or purchasing of advertising slots,"¹¹³ "[s]election of audiences,"¹¹⁴ "[i]dentifying voters or

¹⁰⁷ See ¶14.

¹⁰⁸ See ¶16.

¹⁰⁹ Spies, supra note 9. See also \P 13-16.

¹¹⁰ See ¶15.

¹¹¹ See ¶19-20, 22-23, 25, 27-28, 31-32, 34-35, 37, 39-40, 42-45.

¹¹² See ¶19-20, 22-23, 25, 27-28, 31-32, 34-35, 37, 39-40, 42-45.

¹¹³ 11 C.F.R. § 109.21(d)(4)(ii)(A).

¹¹⁴ *Id.* § 109.21(d)(4)(ii)(B).

developing voter lists,"¹¹⁵ or "otherwise providing political or media advice."¹¹⁶ For example:

- a) National Media's "senior media buyer" Ben Angle was AMAG's contact for a Donald J. Trump for President, Inc. ad buy on September 20, 2016, and Red Eagle's contact for a NRA-PVF ad buy on June 28 and an NRA-ILA ad buy October 14, 2016. Angle's bio states that he "strategically place[s] efficient and effective media buys,"¹¹⁷ and he was publicly described as responsible for "placing all of the Trump campaign's television advertising during the last seven weeks of the campaign"¹¹⁸—during the same period that he also purchased and placed the NRA-ILA's pro-Trump ads.
- b) National Media's "senior media buyer" Kristy Kovatch appeared as AMAG's contact for Donald J. Trump for President, Inc. ad buys on September 16, November 3, November 4, 2016, and as Red Eagle's contact for an NRA-PVF ad buy on May 24 and an NRA-ILA ad buy on September 19, 2016. Kovatch's bio describes her as "specializ[ing] in television media buying for political candidates, issue/advocacy groups and public affairs clients," with an "extensive knowledge of ratings, costs and seasonal trends across all time periods and dayparts." ¹¹⁹
- c) National Media's "director of accounting" **Jon Ferrell** signed documents on behalf of AMAG placing placing ads for Donald J. Trump for President, Inc. on

¹¹⁵ Id. § 109.21(d)(4)(ii)(G).

¹¹⁶ *Id.* § 109.21(d)(4)(ii)(I).

¹¹⁷ NATIONAL MEDIA, *supra* note 13. (Attached as Exhibit A.)

¹¹⁸ Spies, *supra* note 9.

¹¹⁹ NATIONAL MEDIA, *supra* note 13. (Attached as Exhibit B.)

October 4, October 24, November 3, and November 4, 2016, and on behalf of Red Eagle for NRA-PVF ad buys on July 11, August 5, and October 19, 2016, and for an NRA-ILA ad buy on September 15, 2016. He also signed a check for an August 11, 2016 NRA-PVF ad buy. Ferrell is the organization's chief financial officer charged with "managing the financial details of political campaigns."¹²⁰

- d) National Media's media specialist Caroline Kowalski appeared as AMAG's contact for Donald J. Trump for President, Inc. ad buys on September 28, November 3, and November 4, and as Red Eagle's contact for NRA ad buys on August 11 and October 28. Kowalski's LinkedIn page states that during her tenure at National Media (March 2016 to May 2017) she "[r]esearched voter demographic data to help create national, statewide and local advertising campaigns for Presidential, senatorial, and congressional candidates, issue-advocacy groups, and PACs."¹²¹
- 64. Moreover, the evidence indicates that these same senior National Media officials made use of their knowledge about the "plans, projects, activities or needs" of the Trump campaign to most effectively place the NRA-ILA and NRA-PVF ads supporting Trump. For example, Jon Ferrell purchased ads on the same ABC affiliate, to air during the same one-week period, on behalf of Donald J. Trump for President, Inc. and AMAG, and on behalf of the NRA-PVF and Red Eagle.¹²² National Media officials placed five Trump campaign ads and five NRA-

¹²⁰ *Id.* (Attached as Exhibit C.)

¹²¹ Caroline Kowalski, LINKEDIN, *supra* note 32. (Attached as Exhibit D.)

¹²² See supra ¶¶ 39-40.

ILA ads to run on the same afternoons, on the same stations, and during the same five college football games.¹²³ As *Mother Jones/The Trace* reported:

The purchases were mirror images of each other. . . When the NRA ran two spots either attacking Clinton or promoting Trump, the Trump campaign ran just one. And when the Trump campaign ran two spots, the NRA ran one. The pattern even persisted when there was no direct overlap: In the two games the Trump campaign sat out, the NRA ran two ads. And in the one game where the NRA didn't buy time, Trump bought two slots. Side by side, the spots aired across the country, on as many as 120 stations, according to data provided by Raycom.¹²⁴

- 65. These facts and this pattern of activity provide reason to believe that National Media employees used information about the "plans, projects, activities or needs" of Donald J. Trump for President, Inc. in placing ads for the NRA-ILA and NRA-PVF, and that such information was "material to the creation, production, [and] distribution of the communication[s]." 11 C.F.R. § 109.21(d)(4).
- 66. For these reasons, there is reason to believe that the NRA-ILA and NRA-PVF satisfied the "conduct" standard by coordinating their communications with Donald J. Trump for President, Inc. through a "common vendor." 11 C.F.R. § 109.21(d)(4).
- 67. 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).
- 68. Therefore, because the NRA-ILA and NRA-PVF advertisements supporting Trump satisfy Section 109.21's three-prong test, the NRA-ILA and NRA-PVF have made in-kind contributions to Donald J. Trump for President, Inc. 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), in violation of FECA's reporting requirements. 52 U.S.C. § 30104(b), and for the NRA-ILA, in violation of FECA's

¹²³ *Compare* Exhibit M at 4-5, *with* Exhibit L at 5-6.

¹²⁴ Spies, *supra* note 9.

prohibition on contributions to a candidate using corporate funds, 52 U.S.C. § 30118(a), (b)(2).

PRAYER FOR RELIEF

- 69. Wherefore, the Commission should find reason to believe that the NRA-ILA and NRA-PVF violated 52 U.S.C. § 30101 *et seq.*, and should conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
- 70. 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

Campaign Legal Center, by Brendan M. Fischer 1411 K Street, NW, Suite 1400 Washington, DC 20005 (202) 736-2200

when

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

December 7, 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 $\frac{1}{2}$ day of December 2018.



For Giffords

a Damashur

Alison Damaskos

Sworn to and subscribed before me this $\underline{/}$ day of December 2018.

Notary Public







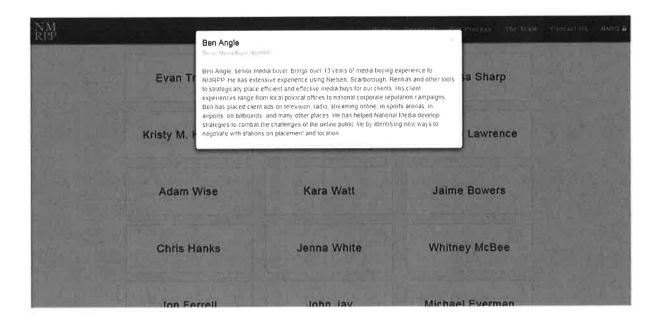


EXHIBIT B

Kristy M. F Niary Kristy M. F		s In her 20 years at s She has consistently densive knowledge of		
Adam Wise		Kara Watt	Jaime Bowers	
Chris Hanks		Jenna White	Whitney McBee	
Jon Ferrell		John Jay	Michael Eyerman	

14

EXHIBIT C

NM RPP	KIISTY W. 1	Jon Ferrell			Cawrence	hulo e	
	Adam V	managing the financia allocated for media is payments to vendors to completes a thorough	han 28 yéars of experience as a CPA-16 of whi I depact of political campaigns. Jon ensures that spent according to election laws, as well as deb to guarantee seamless implementation of media postielection analysis of every account to subs s help NURPP provide optimal financial steward	Bowers			
	Chris H	anks	Jenna White	Whitn	ey McBee		
	Jon Fe	rrell	John Jay	Michae	al Eyerman		
	Craig E	ilum	Kyle Anderson	Joe	ey Ardis		

EXHIBIT D

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E	Project Coordinator USA TODAY Jub, 2017 - Present + 1 year 6 Media Specialist National Media Research. Plan March 2016 - May 2017 + 1 year	ining and Placement LLC
	Researched voter demograph local advertising campaigns for candidates issue-advocacy gr Generated reports and charte Vorked with media outlets to TV and radio stations Managed financial resources financial records for clients	ta buyers and TV tadio and cable networks nic data to help create national statewide and Presidential senatorial and congressional oups and PACs d analytics to monitor viewership of media outlets assist in the execution of media buys on major processed invokes, and ensured accuracy of Poliquin for Congress radio buys in 1.1aine
	Sales Associate ,Stylist, The Lucky Knot July 2012 – 2016 • 4 years	and Vieuel Marketing and Merchandiser

EXHIBIT E

STATION ISSUE ADVERTISING REQUEST SHEET

(to be filled out and kept on file for public inspection)

To: Public File	This request was:
Station: WEWS	✓ Accepted
From: Erin Brody	Rejected
Date: May 24, 2016	

Agency: Red Eagle Media Group Address: 815 Slaters Lane Alexandria, VA 22314

Phone #: 703 683-4877

Contact: Kristy Kovatch

Does the programming (in whole or in part) communicate				
a message relating to any political matter of national importance?				
✓ Yes No				

Issue: 2nd amendment

Candidate Mentioned: Hillary Clinton *Election Mentioned:* Presidential General Election 11/8/16

Sponsor: National Rifle Association of America Political Victory Fund

Address: 11250 Waples Mills Road Fairfax, VA 22030

Phone: 800 672-3888

Executive Officer(s): Mary Rose Adkins Wayne LaPierre *Title:* Treasurer CEO

EXHIBIT F

KDKA/WPCW TV PITTSBURGH

ISSUE GROUP

POLITICAL INQUIRY FORM

KDKA/WPCW TV

RECORD OF REQUEST – Political Broadcast Time:

NAME OF REQUESTOR:

1. NAME OF AD AGENCY:

2. ORGANIZATION PAYING FOR TIME:

- 3. OFFICERS OF GROUP:
- 4. ENTITY FURNISHING TAPES:
- 5. BROADCAST TO FAVOR LEGISLATION:
- 6. CATEGORY:
- 7. POLITICAL PARTY OR OFFICIAL AFFILIATION:
- 8. DATE OF REQUEST
- 9. NATURE OF REQUEST:
- **10. DISPOSITION MADE OF REQUEST**
 - (a) Granted
 - (b) Denied (reason)

2016 – General Election Ben Angle

, ingle

Red Eagle Media Group 815 Slaters Lane Alexandria, VA 22314-1219

National Rifle Association Political Victory Fund See NAB for details

See NAB for details

N.R.A. – P.V.F.

N/A

ISSUE – National Importance w/ Federal Candidate References: Anti-Clinton (D) Pro-Trump (R)

Republican

6/28/16

NON-CANDIDATE Rate Card

_x__

CBS EMPLOYEE Brian Butz Political Advertising Director KDKA/WPCW TV Pittsburgh

14

EXHIBIT G

POLITICAL/ISSUE AVAIL REQUEST

		DATE:	June 11, 2016				
REQUESTED BY:	Red Eagle Med	lia Group					
ADDRESS:	817 Slaters La	ne, Alexandria, VA	22314				
TELEPHONE#	703-683-4877	703-683-4877					
ON BEHALF OF CANDI	DATE/ISSUE:	NRA-PVF					
OFFICE/ISSUE:	US Presidentia	l Race					
PARTY AFFILIATION:	ISSUE						
COMMITTEE:	National Rifle A	Association Political	Victory Fund				
TREAS./CHAIRMAN:	Mary Rose Adl	kins, Treasurer					
ADDRESS:	11250 Waples	Mill Road, Fairfax, V	VA 22030				
TELEPHONE#	NA						
DATES AND TIMES REC	QUESTED:	all					
REMARKS:	www.nrapvf.on	g					
Additional Board Members:	Chris Cox, Exe	ecutive Director; Wa	ayne LaPierre, Executive VP and C				
Kayne Robinson	, Executive Director of	of NRA General Ope	erations Division;				
John Bolton. Cha	irman of Internationa	I Affairs Subcommit	Itee				

AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Date: Station and Location: WMP Ralugh-Durham, NC 11/2014

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

National Rifle Association of America Political Victory Fund 2014 Presidential Election

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

This broadcast time will be used by: NRA-PVF

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?"

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):

ZOLU Presidential Election, 11/8/2016 Hurry Clinton & Doneld Trump

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

National Rifle Association of America Political Victory Fund 11250 Waples Mill Road Falrfax, 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):

Treasurer - Mary Rose Adkins Su Attached

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

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.

ΤΟ ΒΕ	SIGNED BY ISSUE ADVERTISER (S	sponsor)
Date	Signature	Contact Phone Number
7	O BE SIGNED BY STATION REPRESENT.	ATIVE
🗆 Accepte	ed 🛛 Accepted in Part	🗆 Rejected

Signature

Printed Name

Title

AGREED UPON SCHEDULE

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

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Weck	Number of Weeks
As	Attached				

Attach proposed schedule with charges (if available):

AFTER AIRING OF BROADCASTS:

Attach invoices or Schedule Run Summary to this Form showing:

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

dollar amount for each rebate), if any.

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

EXHIBIT H

NAB Form PB-18 Issues

AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Date: Station and Location: WTVD. N Kaleigh, NC 815/2016

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

National Rifle Association of America 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
	F.	3 000	lere d		
			818	8/14/2	016

This broadcast time will be used by: NRA-PVF

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):

Hillary Clinton for 45 President Nov 8,2016 Mereral Election GUD Control

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

National Rifle Association of America Political Victory Fund 11260 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):

Treasurer - Mary Rose Adkins

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

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

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

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

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

NAB Form PB-18 Issues

TO BE COMPLETED FOR ALL ISSUE ADVERTISEMENTS

14

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 SIGNE	D BY ISSUE ADVERTISER (S	SPONSOR)
Date 7	<u>ACZenell</u> Signature	Contact Phone Numbe
TO BE SI	GNED BY STATION REPRESENT.	ATIVE
□ Accepted	Accepted in Part	🗇 Rejected

Signature

2.1

.

Printed Name

Title

AGREED UPON SCHEDULE

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

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

Attach proposed schedule with charges (if available):

AFTER AIRING OF BROADCASTS:

Attach invoices or Schedule Run Summary to this Form showing:

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

dollar amount for each rebate), if any.

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

EXHIBIT I



CP Broadcasting Corporation WBOB 7235 Bonneval Road Jacksonville, FL 32256

WBOB-AM Order Confirmation

OrderID: 1358-001

Sponsor: Nat'l Rifle Assn/Political Victory Fund Product: Nat'l Rifle Assn/Political Victory Fund Estimate/PO: 4285522 AccountRep: Gen Media Partners BillingCycle: Broadcast Month InvoiceType: Detail 8/13/2016 - 8/30/2016 Run Dates: Items Ordered: 58 Ordered Amount: \$2,480.00 -\$372.00 -Agency Commission: Net Amount: \$2,108.00

RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA, VA 22314

Scheduled Station(s): WBOB-AM Nat'l Rifle Assn/Political Victory Fund Estimate #7653

	Run Dates	Run Weeks	Run Times	Ma	n Tu	Wed	Thu	Fri	Sat	Sun	Week Total	Length	Description	Avail Type	Copy ID	Qty	Item Cost	Total Cost
01 02 03 04 05	8/13/2016 - 8/28/2016 8/15/2016 - 8/19/2016 8/22/2016 - 8/26/2016 8/29/2016 - 8/29/2016 8/30/2016 - 8/30/2016	Ali Weeks Ali Weeks Ali Weeks Ali Weeks Ali Weeks Ali Weeks	06:00 AM - 07:00 PM 06:00 AM - 07:00 PM 06:00 AM - 07:00 PM 06:00 AM - 07:00 PM 06:00 AM - 10:00 AM	A 4 A 4 A 4	4 4 4	4 4	4 3	3 4	2	2	4 19 19 4 4	:60 :60 :60	Spot			12 19 19 4 4	15.00 50.00 50.00 50.00 50.00 50.00	180.00 950.00 950.00 200.00 200.00
B	roadcast Month Projecte	ed Billing:					- 21 - 52 - 54											
	Ju⊢16		0.00	Aug-16			2,080.0	0		:	Sep-16		400.	00	Q	3-2016		2,480.00

MARKET: REP: MOD:	Jacksonville, FL Non-Rep Local Focus Stn Ver: 1 Last:	AMOUNT: \$2,480.00 SPOTS: 58	AGENCY:	Red Eagle Media Group 815 Slaters Lane Alexandria, VA 22314
SALES OFFICE: SALESPERSON: SLS EMAIL:	PHILADELPHIA Roger Rafson Roger.Rafson@GenMediaPartner	SLS PH: 412 421 2600 SLS FAX: 412 421 6001 s.com	BUYER:	Megan Burns
AGENCY: ADVERTISER: PRODUCT: FLIGHT:	Red Eagle Media Group Nat'l Rifle Assn/Political Victory Fund Est. 7653 8/12-8/30 08-12-2016 TO 08-30-2016	AGY CLI: AGY PRD: AGY EST: 7653 []Unwired [X]Spot []Mod	CONTRACT INVOICE:	# FOR INVOICING 4285522 Red Eagle Media Group 815 Slaters Lane Alexandria, VA 22314
TOT # OF DAYS: PRIM. DEMO: SEC. DEMO:	19 Adults 35+	[X]Cash []Trade SPOT TYPE:	LAST SENT	: 08/11/2016 14:48

COMMENTS

08/11/2016: This is a new order - it will be sent via email also if you are not on Radio Exchange. Take care not to double book. Please confirm receipt of order in Radio Exchange or by email at joyce.vordenbaum@genmediapartners.com (with call letters in subject line) within 24 hours. Thank you.

Rates are gross. By accepting and running this order this station agrees to pay GenMedia Partners 15% commission on the net amount of this order. Invoices/affidavits of performance are due no later than 7 days after the end of each broadcast month.

DAY#	<u>ب</u>		8/12/2016 To	8/12/2016				TOT \$150.00		TOTAL SPOT	rs 3
МС	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY	RATE	TOTAL
	1	RT	F	6:00AM	7:00PM	60	8/12/2016	8/12/2016	(3 Movet Nevet	\$50	\$150

TOT \$30.00 TOTAL SPOTS 2 DAY#2 8/13/2016 To 8/13/2016 STOP SP/DY RATE TOTAL DAYS START END LEN START MC LN DPT CD TIME ž \$30 8/13/2016 8/13/2016 \$15 60 2 RTs. 6:00AM 7:00PM

DAY	#3		8/14/2016 To 8	B/14/2016				TOT \$30.00		TOTAL SP	POTS 2
мс	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY	RATE	TOTAL
	2	RT	s	6:00AM	7:00PM	60	8/14/2016	8/14/2016	2	\$15	\$30

PIAN	UN.		V V D			URVER			DATE.	00/11/20		1	
MARK	ET:		Jac	ksonville, FL		AMOUN	T: \$ 2,4	180.00	AGENCY:	-	le Media Gr	oup	
REP:			Nor	n-Rep Local Focu	S	SPOTS:	58			815 Slat Alexand	ers Lane ria, VA 2231	4	
MOD:			Str	NVer: 1 Last:									
SALE	S OFF	CE:	PH	ILADELPHIA		SLS PH:	412	421 2600	BUYER:	Megan E	Burns		
SALE	SPERS	SON:	Rog	ger Rafson		SLS FAX	K: 412	421 6001					
SLS E	MAIL:		Rog	ger.Rafson@Gen	MediaPartne	rs.com							
ACEN	ov.		Da	- 		AGY CL			CONTRACT		FOR INVOICING 4285522		
AGEN				Eagle Media Gr	-				INVOICE: Red Eagle Media Group				
ADVE	RTISE	R:	Nat Fur	'l Rifle Assn/Politi	cal Victory	AGY PR	D:		INVOICE:	Red Eag	lie media Gr	oup	
PROD	UCT:			. 7653 8/12-8/30		AGY EST: 7653					ers Lane ria, VA 2231	4	
FLIGH			12-2016 TO 08-3	0-2016	[]Unwired [X]Spot []Mod								
тот #	of D/	AYS:	19										
PRIM.	DEMO):	Adu	ults 35+		[X]Cash	[]Trad	e					
SEC.	DEMO					SPOT T	YPE:		LAST SENT	:08/11/20)16 14:48		
DAY#	A			8/15/2016 To 8/1	5/0046				TOT \$200.00	n	TOTAL SP	OTS 4	
UAT#	4			8/15/2010 10 8/	5/2010				· · · · · · · · · · · · · · · · · · ·		r		
МС	LN	DPT	CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY	RATE	TOTAL	
	1	RT		м	6:00AM	7:00PM	60	8/15/2016	8/15/2016	4	\$50	\$200	
Line 1 DAY#		EASE	NOT	Е - 10AM CUTO 8/16/2016 To 8/					TOT \$150.00)	TOTAL SP	OTS 3	
DAT#			_		· · · · · · · · · · · · · · · · · · ·								
мС	LN	DPT	CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY		TOTAL	
	1	RT		.T	6:00AM	7:00PM	60	8/16/2016	8/16/2016	3	\$50	\$150	

Line 1 => PLEASE NOTE - 10AM CUTOFF ON 8/30.

DAY#	6		8/17/2016 To 8	B/17/2016				TOT \$200.00)	TOTAL SP	OTS 4
мс	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY		TOTAL
	1	RT	w	6:00AM	7:00PM	60	8/17/2016	8/17/2016	4	\$50	\$200

DAY#	7		8/18/2016 To 8/	18/2016				TOT \$150.00)	TOTAL S	POTS 3
мс	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY		TOTAL
	1	RT	T	6:00AM	7:00PM	60	8/18/2016	8/18/2016	3	\$50	\$150

SEC. DEMO:		SPOT TYPE:	LAST SENT	:08/11/2016 14:48
PRIM. DEMO:	Adults 35+	[X]Cash []Trade		
TOT # OF DAYS:	19			
FLIGHT:	08-12-2016 TO 08-30-2016	[]Unwired [X]Spot []Mod		
PRODUCT:	Est. 7653 8/12-8/30	AGY EST : 7653		815 Slaters Lane Alexandria, VA 22314
ADVERTISER:	Nat'l Rifle Assn/Political Victory Fund	AGY PRD:	INVOICE:	Red Eagle Media Group
AGENCY:	Red Eagle Media Group	AGY CLI:		# FOR INVOICING 4285522
SLS EMAIL:	Roger.Rafson@GenMediaPartne	rs.com		
SALESPERSON:	Roger Rafson	SLS FAX: 412 421 6001		
SALES OFFICE:	PHILADELPHIA	SLS PH: 412 421 2600	BUYER:	Megan Burns
MOD:	Stn Ver: 1 Last:			
REP:	Non-Rep Local Focus	SPOTS : 58		815 Slaters Lane Alexandria, VA 22314
MARKET:	Jacksonville, FL	AMOUNT: \$2,480.00	AGENCY:	Red Eagle Media Group
STATION.		URDER#. 3130324	DATE.	Red Feels Media Croup

TOTAL SPOTS 3 TOT \$150.00 DAY#8 8/19/2016 To 8/19/2016 TOTAL RATE STOP SP/DY END LEN START MC DPT CD DAYS START LN TIME 3 \$50 \$150 60 8/19/2016 8/19/2016 7:00PM 1 6:00AM RTF..

Line 1 => PLEASE NOTE - 10AM CUTOFF ON 8/30.

DAY#	9		8/20/2016 To 8	3/20/2016				TOT \$30.00		TOTAL SPO	DTS 2
мс	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY	RATE	TOTAL
	2	RT	s.	6:00AM	7:00PM	60	8/20/2016	8/20/2016	2	\$15	\$30

DAY#	10		8/21/2016 To 8/2	1/2016				TOT \$30.00		TOTAL SPO	TS 2
мс	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY	RATE	TOTAL
	2	RT	S	6:00AM	7:00PM	60	8/21/2016	8/21/2016	2`	\$15	\$30

DAY#	DAY#11 8/22/2016 To			16 To 8/22/2016						TOTAL SPOTS 4		
МС	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY	RATE	TOTAL	
	1	RT	м	6:00AM	7:00PM	60	8/22/2016	8/22/2016	4	\$50	\$200	

STAT	NJN.				URUER	e. aia	0024	VALC.	00/11/20	טוי	
MARK	29		Jacksonville, FL		AMOUN			AGENCY:		le Media G	roup
REP:			Non-Rep Local Foc	us	SPOTS:				815 Slat		
MOD:			Stn Ver: 1 Last:								
SALE	S OFF	ICE:	PHILADELPHIA		SLS PH	: 412	421 2600	BUYER:	Megan E	Burns	
SALE	SPER	SON:	Roger Rafson		SLS FA	K: 412	421 6001				
SLS E	MAIL:		Roger.Rafson@Ge	nMediaPartne	ers.com						
	0.	G				1.		CONTRACT	# 500 W		1205522
			Red Eagle Media G	•	AGY CL			•••••••			
ADVE	RTISE		Nat'l Rifle Assn/Poli Fund	tical victory	AGY PR	D:		INVOICE:	Red Eag	le Media G	oup
PROD	UCT:		Est. 7653 8/12-8/30	1	AGY ES	T : 765	3		• • • • • • • • • • • • • • • • • • • •	ers Lane ria, VA 2231	4
FLIGH	IT:		08-12-2016 TO 08-	30-2016	[]Unwire	ed [X]S	pot []Mod		12		
тот #	OF D	AYS:	19								
	DEMO		Adults 35+		[X]Cash	[]Trad	e				
SEC.	DEMO	:			SPOT T			LAST SENT	:08/11/20	16 14:48	
DAY#	12		8/23/2016 To 8	/23/2016				TOT \$150.00)	TOTAL SP	OTS 3
MC	LN	DPT C	DAYS	START	END TIME	LEN	START	STOP	SP/DY		ΤΟΤΑ
	1	RT	.T	6:00AM	7:00PM	60	8/23/2016	8/23/2016	3	(\ \$50	\$15
Line 1		EASE N	OTE - 10AM CUTC			τį.		TOT \$200 OF		TOTAL SP	015 4
-	F13		8/24/2016 To 8	/24/2016			r	TOT \$200.00		IUIAL SP	
DAY#					END	LEN	START	STOP	SP/DY	/ RATE	ΤΟΤΑ
DAY# MC	LN	DPT C	DAYS	START	END TIME	LEIN	OTAIN				

Line 1 => PLEASE NOTE - 10AM CUTOFF ON 8/30.

DAY#	14		8/25/2016 To 8	3/25/2016				TOT \$150.00)	TOTAL SP	OTS 3
мс	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY		TOTAL
	1	RT	T	6:00AM	7:00PM	60	8/25/2016	8/25/2016	3	\$50	\$150

DAY#	15		8/26/2016 To 8	26/2016				TOT \$200.00)	TOTAL SF	POTS 4
MC	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY	RATE	TOTAL
	1	RT	F	6:00AM	7:00PM	60	8/26/2016	8/26/2016	4	v _{\$50}	\$200

DAY#16	8/27/2016 To 8/27/2016		TOT \$30.00	TOTAL SPOTS 2
SEC. DEMO:		SPOT TYPE:	LAST SENT	Г:08/11/2016 14:48
PRIM. DEMO:	Adults 35+	[X]Cash []Trade		
TOT # OF DAYS:	19			
FLIGHT:	08-12-2016 TO 08-30-2016	[]Unwired [X]Spot []Mod		
PRODUCT:	Est. 7653 8/12-8/30	AGY EST: 7653		815 Slaters Lane Alexandria, VA 22314
ADVERTISER:	Nat'l Rifle Assn/Political Victory Fund	AGY PRD:	INVOICE:	Red Eagle Media Group
AGENCY:	Red Eagle Media Group	AGY CLI:	••••••	F # FOR INVOICING 4285522
SLS EMAIL:	Roger.Rafson@GenMediaPartne			
SALESPERSON:	Roger Rafson	SLS FAX: 412 421 6001		
SALES OFFICE:	PHILADELPHIA		BUTER.	Megan burns
MOD:	Stn Ver: 1 Last:	SLS PH: 412 421 2600	BUYER:	Megan Burns
REP:	Non-Rep Local Focus	SPOTS : 58		815 Slaters Lane Alexandria, VA 22314
MARKET:	Jacksonville, FL	AMOUNT: \$2,480.00	AGENCY:	Red Eagle Media Group
STATION.		URDER#. 3130324	DATE.	V0/11/2010

мс	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY	RATE	TOTAL
	2	RT	s.	6:00AM	7:00PM	60	8/27/20 16	8/27/2016	2	\$15	\$30

DAY	†17		8/28/2016 To 8	B/28/2016				TOT \$30.00		TOTAL SPO	DTS 2
мс	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY	RATE	TOTAL
	2	RT	S	6:00AM	7:00PM	60	8/28/2016	8/28/2016	2`	\$15	\$30

DAY#	DAY#18		8/29/2016 To 8/29/2016					TOT \$200.00)	TOTAL SPOTS 4	
мс	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY	RATE	TOTAL
	1	RT	м	6:00AM	7:00PM	60	8/29/2016	8/29/2016	4	\$50	\$200

Line 1 => PLEASE NOTE - 10AM CUTOFF ON 8/30.

DAY#	DAY#19 8/3		8/30/2016 To	/30/2016 To 8/30/2016				TOT \$200.00 T			TOTAL SPOTS 4		
мс	LN	DPT CD	DAYS	START	END TIME	LEN	START	STOP	SP/DY	/ R4	TE	TOTAL	
	1	RT	.T	6:00AM	10peen	60	8/30/2016	8/30/2016	4	di.	\$50	\$200	

2		MUR755300061		
DIATION.		URDER#. 3130324	DAIG.	V0/ 11/2010
MARKET:	Jacksonville, FL	AMOUNT: \$2,480.00	AGENCY:	Red Eagle Media Group
REP:	Non-Rep Local Focus	SPOTS: 58		815 Slaters Lane Alexandria, VA 22314
MOD:	Stn Ver: 1 Last:			
SALES OFFICE:	PHILADELPHIA	SLS PH: 412 421 2600	BUYER:	Megan Burns
SALESPERSON:	Roger Rafson	SLS FAX: 412 421 6001		
SLS EMAIL:	Roger.Rafson@GenMediaPartne	rs.com		
AGENCY:	Red Eagle Media Group	AGY CLI:	CONTRACT	# FOR INVOICING 4285522
ADVERTISER:	Nat'l Rifle Assn/Political Victory Fund	AGY PRD:	INVOICE:	Red Eagle Media Group

AGY EST: 7653

[X]Cash []Trade SPOT TYPE:

[]Unwired [X]Spot []Mod

PRODUCT:

PRIM. DEMO:

SEC. DEMO:

TOT # OF DAYS: 19

FLIGHT:

Est. 7653 8/12-8/30

Adults 35+

08-12-2016 TO 08-30-2016

1			 	 	T T	T	- r - 1	1	Tetel
TOTAL	Aug	Sep							Total
SPOT	50	8							58
CASH	2,080.00	400.00							2,480.00
TOTAL	2,080.00	400.00							2,480.00

v 210800 net

815 Slaters Lane

LAST SENT:08/11/2016 14:48

Alexandria, VA 22314

NAB Form PB-18 Issues

AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Station and Location:		Date:	
WBOB. AM	Jacksonville, FL	8/11/10	

I, Red Eagle Media Group

do hereby request station time concerning the following issue:

National Rifle Association of America Political Victory Fund

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

This broadcast time will be used by: ______

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).

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):

Netional Rifle Association of America Political Victory Fund 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):

Treasurer - Mary Rose Adkins

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

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

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

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

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

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3

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.

ΤΟ ΒΙ	E SIGNED BY I	SSUE ADVERTISER (S	PONSOR)
Date	- Chi	Signature	Contact Phone Number
,	TO BE SIGNED E	Y STATION REPRESENT	ATIVE
Accep	ted	Accepted in Part	🖾 Rejected
Auila	<u>~</u>	Clerri Landrun Printed Name	Title

AGREED UPON SCHEDULE

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

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

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.

PRODUCTION ORDER

Acce	ount:	NRA Pol	itical Victory	Fund	Date		Au	gust 11, 2016
Г	lime:		4:22pm		_ AE: _	1	National (Gerri)	12
Traffic	Enter	red By:			_Date/	Time Complete	ed	
Prod. [Dir. As	ssigned to:			_ Date/	Time Assigned	db	:
Produc	ced by	y:			_Date/	Time Complet	ed	:
First	Spin	Oth	er DG/	Fast Ch		Email from	Ge	<u>rrí</u>
1:			PRODU	CTION	TO BI	E mp3'd TO:		
	Addro	ess:			Addro	ess:		
	Addro	ess:			Addro	ess:		
New	d CD Spot Hand		Add To Rota Replace Exi Extend Exis	isting		p Information aw End Date	Is this Co-Op	
Stat	ion	PROMISE	ANSWER	BEAG	СН	TRUTH	PRAISE	
Start	Date		8/13/16					
End [Date		8/30/16					-
Order	#		1358-001					
Est#/D	esc.		7653					
Length	%	Cart #			ISC	CI CODE OR T	TLE	
60	100		NRAHDV11	1216				

Special Instructions: Thanks!

8/11/20104.50 PM

1.12.15 Version



Red Eagle Media Group

815 Slaters Lane, Alexandria, VA 22314 Phone: 703-683-4877 Fax: 703-683-6692

TRAFFIC INSTRUCTIONS

TO: TRAFFIC MANAGER

FROM: Caroline Kowalski

DATE: August 11th, 2016

ADVERTISER: NRA-PVF

You will receive a new: 60 spot via email, NRAHDV111216.

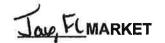
EFFECTIVE Friday August 12th, 2016, please run the following spot in this rotation:

NRATV080316H

100%

PLEASE SIGN & FAX OR EMAIL BACK TO CONFIRM RECEIPT OF TRAFFIC & SPOT

1.)BOB AMSTATION



INITALS

Please call 703-683-4877 or email <u>caroline.kowalski@redeagleteam.com</u> with questions or problems.

D EAGLE MEDIA G		WBOBAM - WBOB-AM		2787	8.71817
Inv Date	invoice #	Description	Balance Due	Discount	Net Amount
08-11-16 08-11-16	CIA-S-3051 CIA-S-3052	NRAPVR-NRP16-NRP16 7653 NRAPVR-NRP16-NRP16 7653	1,768.00 340.00	A 360MA 1 Core	1,768.00 340.00

Check Total:

\$2,108.00

@Sc	afeguard in	140 I/SA TO	D REONDER, CALLYOUR LOCAL SAFEQUARD DIGT	TRIBUTOR AT 800-222-0842		4/14 W145FC00786A1
An	< NUTRING CONTRACTOR	and China and China and	na avantenskran na kova na na oraz 2000	STOLS AND REALDRES A FOLL HOLODORAN	ene., "annis siste	and the second of the second
ţ	_			BB&T	2787	2787
	1	RED EAGLE MEDIA GROUP 817 SLATERS LANE ALEXANDRIA, VA 22314		bipeda biandeng and trajet (Sanyara VIRGINIA		NUMBER
				68-426/514		
		.8				
	PAY EXA	CTLY********2,108*DOLLARS*/	AND*00*CENTS			
1				DATE	¥	AMOUNT
				Aug 11, 2016		\$2,108.00
PAV To the Order Of	4	VBOB-AM 190 Belfort Road, Suite 450 acksonville, FL 32216		Opm R.	7	\mathcal{A}

A THE REAL PROPERTY OF

AUTHORIZED SIGNATURE

""00 2 7**8** 7"

THE STATE AND A CONTRACT OF STATE OF ST



CP Broadcasting Corporation WBOB 7235 Bonneval Road Jacksonville, FL 32256

AM600 WBOB Invoice

Involce ID:	16080587
Involce Date:	8/28/2016
Account ID:	1358
Order ID:	1358-001
Account Rep:	Gen Media Partners
Amount Due:	\$0.00
Amount Paid:	

Page 1

RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA, VA 22314 If you have any questions regarding this invoice, please call 904-861-0444.

Pay online at: http://payment.cpbroadcasting.com

Sponsor: National Rifle Assn / Political Victory Fund / Nat'l Rifle Assn/Pol for P.O./Estimate # 4285522 Nat'l Rifle Assn/Political Victory Fund Estimate #7653

Nat'l Rifle Assn/Pol	ilical victory Ful			rage
Date	Time	Length Description	CopyID / ISCI Code	Cost
8/13/2016	06:32 AM	:60 Spot	1358-1	15.00
B/13/2016	03:31 PM	:60 Spot	1358-1	15.00
8/14/2016	02:30 PM	:60 Spot	1358-1	15.00
8/14/2016	04:31 PM	:60 Spot	1358-1	15.00
0/14/2010	04.01 FIM	.50 0001		
8/15/2016	07:49 AM	:60 Spot	1358-1	50.00
8/15/2016	10:33 AM	:60 Spot	1358-1	50.00
8/15/2016	12:42 PM	:60 Spot	1358-1	50.00
8/15/2016	06:31 PM	:60 Spot	1358-1	50.00
8/16/2016	07:49 AM	:60 Spot	1358-1	50.00
8/16/2016	08:58 AM	:60 Spot	1358-1	50.00
8/16/2016	02:14 PM	:60 Spot	1358-1	50.00
8/16/2016	06:45 PM	:60 Spot	1358-1	50.00
9/17/2016	06:48 AM	:60 Spot	1358-1	50.00
8/17/2016 8/17/2016	08:32 AM	:60 Spot	1358-1	50.00
8/17/2016	02:31 PM	:60 Spot	1358-1	50.00
8/17/2016	05:21 PM	:60 Spot	1358-1	50.00
0.110.0010	00.00 ***	ico orat	1358-1	50.00
8/18/2016	06:20 AM	:60 Spot	1358-1	50.00
8/18/2016	07:49 AM	:60 Spot	1358-1	50.00
8/18/2016	10:32 AM	:60 Spot	1358-1	50.00
8/18/2016	06:57 PM	:60 Spot	1398-1	50.00
8/19/2016	10:04 AM	:60 Spot	1358-1	50.00
8/19/2016	11:32 AM	:60 Spot	1358-1	50.00
8/19/2016	05:49 PM	:60 Spot	1358-1	50.00
8/20/2016	10:31 AM	:60 Spot	1358-1	15.00
8/20/2016	06:46 PM	:60 Spot	1358-1	15.00
8/21/2016	11:03 AM	:60 Spot	1358-1	15.00
	03:58 PM	:60 Spot	1358-1	15.00
8/21/2016	03,30 PIVI	.00 3001	1000-1	
8/22/2016	09:19 AM	:60 Spot	1358-1	50.00
8/22/2016	10:32 AM	:60 Spot	1358-1	50.00
8/22/2016	12:58 PM	:60 Spot	1358-1	50.00
8/22/2016	04:57 PM	:60 Spot	1358-1	50.00
8/23/2016	06:48 AM	:60 Spot	1358-1	50.00
8/23/2016	09:20 AM	:60 Spot	1358-1	50.00
8/23/2016	10:32 AM	:60 Spot	1358-1	50,00
8/23/2016	06:47 PM	:60 Spot	1358-1	50.00
9/04/0010	09.04 AM	:60 Spot	1358-1	50.00
8/24/2016	08:04 AM	:60 Spot	1358-1	50.00
8/24/2016	11:58 AM	:60 Spot	1358-1	50.00
8/24/2016 8/24/2016	02:32 PM 03:32 PM	:60 Spot	1358-1	50.00
0/24/2010	00.02 F W			
				Continued

Continued

AM600 WBOB Invoice

Sponsor: National Rifle Assn / Political Victory Fund / Nat'l Rifle Assn/Pol for P.O./Estimate # 42855 by voice ID: 16080587 Nat'l Rifle Assn/Political Victory Fund Estimate #7653 Invoice Date: 8/28/2016 8/28/2016 Page 2

Date	Time	Length	Description	CopyID / ISCI Code	Cost
8/25/2016	08:32 AM	:60	Spot	1358-1	50.00
8/25/2016	12:19 PM		Spot	1358-1	50.00
8/25/2016	03:58 PM		Spot	1358-1	50.00
8/26/2016	09:33 AM	:60	Spot	1358-1	50.00
8/26/2016	10:52 AM		Spot	1358-1	50.00
8/26/2016	02:45 PM		Spot	1358-1	50.00
8/26/2016	04:24 PM		Spot	1358-1	50.00
8/27/2016	08:55 AM	:60	Spot	1358-1	15.00
8/27/2016	06:32 PM		Spot	1358-1	15.00
8/28/2016	06:08 AM	:60	Spot	1358-1	15.00
8/28/2016	06:58 PM		Spot	1358-1	15.00
			50 Total Items	Total Cost: - Agency Commission:	\$2,080.00 -\$312.00
				Net Total:	\$1,768.00

\$1,768.00

-\$1,768.00 8/12/2016 PrePayment Applied Check 2787:

Amount Due:

\$0.00

\$0.00



CP Broadcasting Corporation WBOB 7235 Bonneval Road Jacksonville, FL 32256

AM600 WBOB Invoice

Invoice ID: Invoice Date: Account ID: Order ID: Account Rep:	16090105 9/11/2016 1358 1358-001 Gen Media Partners
Amount Due:	\$0.00
Amount Paid:	

Page 1

RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA, VA 22314 If you have any questions regarding this invoice, please call 904-861-0444.

Pay online at: http://payment.cpbroadcasting.com

Sponsor: National Rifle Assn / Political Victory Fund / Nat'l Rifle Assn/Pol for P.O./Estimate # 4285522 Nat'l Rifle Assn/Political Victory Fund Estimate #7653

Co	CopyID / ISCI Code	Description	Length	Time	Date
50.0	1358-1	Spot	:60	07:20 AM	8/29/2016
50.0	1358-1	Spot	:60	10:04 AM	/29/2016
50.0	1358-1	Spot	:60	01:20 PM	8/29/2016
50.0	1358-1	Spot	;60	06:17 PM	8/29/2016
50.0		•			
50.0	1358-1	Spot	:60	06:32 AM	/30/2016
50.0	1358-1	Spot	:60	07:19 AM	/30/2016
50.0	1358-1	Spot	:60	08:58 AM	3/30/2016
50.0	1358-1	Spot	:60	09:04 AM	8/30/2016
\$400.0	Total Cost:	8 Total Items			
-\$60.0	- Agency Commission:				
\$340.0	Net Total:				
-\$340.0	8/12/2016 PrePayment Applied Check 2787:				
\$0.0	Amount Due:				

EXHIBIT J





POLITICAL INQUIRY RECORD: FEDERAL, STATE & LOCAL CANDIDATE ADS <u>ALL QUESTIONS MUST BE ANSWERED</u>

Federal Candidate

State or Local Candidate

1. Requested by (Agency name, address, phone number & contact):

Agency NameAmerican Media & Advocacy GroupContactKristy Kovatch

Phone Number 703-683-4877

Address 815 Slaters Lane Alexandria, VA 22314

2. On behalf of (Candidate name & authorized campaign committee name):

Donald Trump, RNC/Trump for President

3. Election (Office sought & date):

U.S. President, 11/8/16

4. Date of request:

9/16/16

5. Request received by:

Corey Lane

6. Details:

Candidate rates requested

7. Name, Address & Phone Number of contact person for the candidate or candidate's authorized campaign committee:

Contact Name Tim Jost Phone Number 646-736-1779 Address 725 Fifth Ave New York, NY 10022





POLITICAL INQUIRY RECORD: FEDERAL, STATE & LOCAL CANDIDATE ADS ALL QUESTIONS MUST BE ANSWERED

8. Name of treasurer of authorized committee:

Tim Jost

9. Date and nature of follow-ups, if any:

Rates sent as requested

- 10. Disposition:
 - Accepted see contract details
 - **O** Rejected provide reason:

Additional Information:

RNC 310 First Street, SE Washington, DC 20003 202-863-8500

EXHIBIT K

STATION ISSUE ADVERTISING REQUEST SHEET

(to be filled out and kept on file for public inspection)

To: Public File	This request was:
Station: WEWS	Accepted
From: Erin Brody	Rejected
Date: September 19, 2016	

Agency: Red Eagle Media Group Address: 815 Slaters Lane Alexandria, VA 22314

Phone #: 202-872-1155

Contact: Kristy Kovatch

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

Issue: 2nd Amendment

Candidate Mentioned:Election Mentioned:Hillary ClintonGeneral Election, 11/8/16Donald TrumpJonale TrumpSponsor:National Rifle Association for American - Institute for Legislative Action

Address: 11250 Waples Mill Road Fairfax, VA 22030

Phone: 800-672-3888

Executive Officer(s): Mary Rose Adkins Wayne LaPierre *Title:* Treasurer CEO

47

EXHIBIT L

NAB Form PB-18 Issues

AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Station and Location:		×	*:		Date:	Ŧ	::
RAYLOM SPORTS	NETWOER			e" 2	9/15	/16	(P)

Red Eagle Media Group

do hereby request station time concerning the following issue:

National Rifle Association for America - Institute for Legislative Action

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

This broadcast time will be used by: NRA - ILA

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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

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):

National Rifle Association of America - Institute for Legislative Action (NRA-ILA)

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

11250 Waples Mill Road Fplifer VX 2205

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):

and the second	i te
Treasurer - Mary Rose Adkins	120 2
	- 13 M

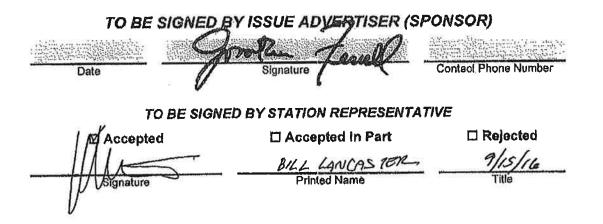
For programming that "communicates a message relating to any political matter of national importance," attach Agreed Upon Schedule (Page 5)

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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.



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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
See	See	See	See	See	See
Schedule	Schedule	Schedule	Schedule	Schedule	Schedule

Attach proposed schedule with charges (if available):

AFTER AIRING OF BROADCASTS:

Attach involces 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.

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INVOICE

	Invoice Date 11/30/2016	Invoice Number 1018035	Page Number 1
	Customer Number RED1	0	Date Printed 10/29/2018
COUNTS PAYABLE	Advertiser NRA-ILA		
SLATERS LANE XANDRIA, VA 22314	Account Executive JIM FORD, RA	YCOM SPORTS,	CHARLOTTE

Description	Quantity	Rate	Net
ACC FOOTBALL - 2016 9/24/2016 EAST CAROLINA @ VIRGINIA TE	2 Commercials	9,200.00	18,400.00
10/1/2016 VIRGINIA @ DUKE	2 Commercials	9,200.00	18,400.00
10/8/2016 GA TECH @ PITTSBURGH	2 Commercials	9,200.00	18,400.00
10/15/2016 PITTSBURGH @ VIRGINIA	2 Commercials	9,200.00	18,400.00
10/22/2016 SYRACUSE @ BOSTON COLLEG	2 Commercials	9,200.00	18,400.00
11/5/2016 GEORGIA TECH @ UNC 11/5/2016 PITTSBURGH @ MIAMI	1 Commercial 1 Commercial	9,200.00 0.00	9,200.00 0.00

TERMS: NET 30 DAYS

MAKE CHECKS PAYABLE TO: RAYCOM SPORTS, INC. 1900 WEST MOREHEAD STREET CHARLOTTE, NC 28208 ATTN: LAURA RHYNE

Federal Tax ID#: 56-2058765 Questions? Contact Laura Rhyne @ 704-338-3061 or Irhyne@raycomsports.com

	\$1	01	,20	0.0
--	-----	----	-----	-----

Less 15% Agency Commission:

15,180.00

Total Amount Due: \$86,020.00

Total:

Raycom Sports

10/29/2018

Page 1

AFFIDAVIT OF PERFORMANCE - ACC FOOTBALL - 2016

Advertiser: NRA-ILA

Date	Time	Len	Туре	Description	_
9/24/2016				EAST CAROLINA @ VIRGINIA TECH	
	2:08:05 pm	:30	Commercial	NRATV091516H "NIGHTSTAND-ILA"	
	3:30:10 pm	:30	Commercial	NRATV091516H "NIGHTSTAND-ILA"	
10/1/2016				VIRGINIA @ DUKE	
	2:17:40 pm	:30	Commercial	NRATV091516H "NIGHTSTAND-ILA"	
	3:20:26 pm	:30	Commercial	NRATV091516H "NIGHTSTAND-ILA"	
10/8/2016				GA TECH @ PITTSBURGH	
	2:54:11 pm	:30	Commercial	NRATV100416H "KRISTI-CC"	
	12:49:29 pm	:30	Commercial	NRATV100416H "KRISTI-CC"	
10/15/2016	3			PITTSBURGH @ VIRGINIA	
	1:21:21 pm	:30	Commercial	NRATV100416H "KRISTI-CC"	
	2:31:06 pm	:30	Commercial	NRATV100416H "KRISTI-CC"	
10/22/2016	5			SYRACUSE @ BOSTON COLLEGE	
	1:12:37 pm	:30	Commercial	NRATV101816H "CLASSIFIED"	
	2:15:01 pm	:30	Commercial	NRATV101816H "CLASSIFIED"	
11/5/2016				GEORGIA TECH @ UNC	
	3:24:54 pm	:30	Commercial	NRATV101816H "CLASSIFIED"	
11/5/2016				PITTSBURGH @ MIAMI	
	3:19:43 pm	:30	Commercial	NRATV101816H "CLASSIFIED"	

.

EXHIBIT M

NAB Form PB-18 Candidates

AGREEMENT FORM FOR POLITICAL CANDIDATE ADVERTISEMENTS

(check applicable box)

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: Raycom Sports 9.20.16

American Media Advocacy Group

being/on behalf of: Donald J. Trump for President, Inc.

a legally qualified candidate of the Republican Party

political party for the office of: President of the United States of America In the General Election

election to be held on: November 8, 2016

do hereby request station time as follows:

Broadcast Length	Time of Day, Rotation or Package	Days	17200191000 A A B B B B B 1017 SNO	Times per Week	25570.0212 APL/6000 #05570 TOTAL
See Schedule	See Schedule	See Schedule	See Schedule	See Schedule	See Schedule
				18	
				alatter of the Problem Science of	

Attach proposed schedule with charges (if available)

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NAB Form PB-18 Candidates

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

Donald J. Trump for President Inc.

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: Tim dost

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.

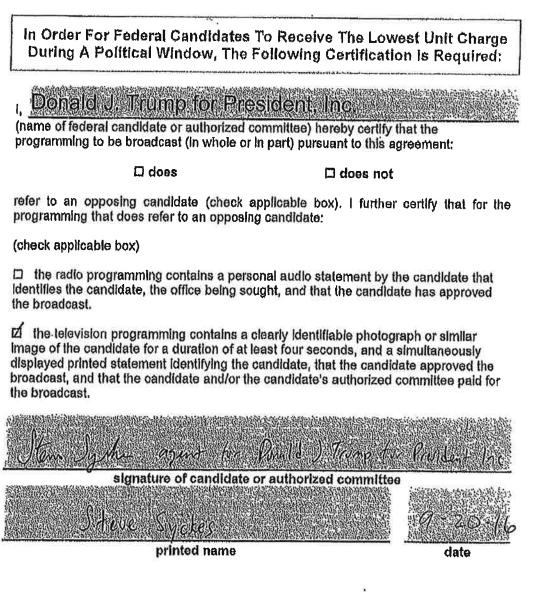
To Be Signed By Candidate or Authorized Committee

9-20-16	In Sinke	
Date	Signature	a which are the second second
TOB	e Signed By Station Representative	
I Accepted	Accepted in Part	🖾 Rejected
	BILL LANCASTER	HP-Sales
Ofghiture	Printed Name	Title

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NAB Form PB-18 Candidates

FEDERAL CANDIDATE CERTIFICATION



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INVOICE

	Invoice Date 11/30/2016	1018047	Page Number 1
	Customer Number AMAG	0	Date Printed 10/29/2018
BEN ANGLE AMAG 817 SLATERS LANE ALEXANDRIA, VA 22314	Account Executive	UMP FOR PR	

Description	Quantity	Rate	Net
ACC FOOTBALL - 2016 9/24/2016 EAST CAROLINA @ VIRGINIA TE	1 Commercial	5,100.00	5,100.00
10/1/2016 VIRGINIA @ DUKE	1 Commercial	5,100.00	5,100.00
10/8/2016 GA TECH @ PITTSBURGH	1 Commercial	5,100.00	5,100.00
10/29/2016 BOSTON COLLEGE @ NC STATE	2 Commercials	5,100.00	10,200.00
11/5/2016 GEORGIA TECH @ UNC 11/5/2016 PITTSBURGH @ MIAMI	2 Commercials 2 Commercials	5,100.00 0.00	10,200.00 0.00

TERMS: NET 30 DAYS

MAKE CHECKS PAYABLE TO: RAYCOM SPORTS, INC. 1900 WEST MOREHEAD STREET CHARLOTTE, NC 28208 ATTN: LAURA RHYNE Total: \$35,700.00

Less 15% Agency Commission:

5,355.00

Total Amount Due: \$30,345.00

Federal Tax ID#: 56-2058765 Questions? Contact Laura Rhyne @ 704-338-3061 or Irhyne@raycomsports.com

Raycom Sports

10/29/2018

۰.

Page 1

AFFIDAVIT OF PERFORMANCE - ACC FOOTBALL - 2016

Advertiser: DONALD TRUMP FOR PRESIDENT

4

Date	Time	Len	Туре	Description
9/24/2016				EAST CAROLINA @ VIRGINIA TECH
	1:11:15 pm	:30	Commercial	DTTV091916H "MOVEMENT H"
10/1/2016				VIRGINIA @ DUKE
	1:15:17 pm	:30	Commercial	DJTTV093016RH "WHY H"
10/8/2016				GA TECH @ PITTSBURGH
	1:01:11 pm	:30	Commercial	DJTTV093016RH "WHY H"
10/29/2016	5			BOSTON COLLEGE @ NC STATE
	1:09:05 pm	:30	Commercial	DJTTV101916AH "CHANGE AH"
	3:43:35 pm	:30	Commercial	DJTTV101716CH "LAURA H"
11/5/2016				GEORGIA TECH @ UNC
	2:44:45 pm	:30	Commercial	DTPCLC3016H "CORRUPTION"
			Commercial	DTTV1028H "CHOICE"
11/5/2016				PITTSBURGH @ MIAMI
	2:36:32 pm	:30	Commercial	DTPCLC3016H "CORRUPTION"
	, 12:24:03 pm		Commercial	DTTV1028H "CHOICE"

.

EXHIBIT N

6403842

American Media & Advocacy Group

815 Slaters Lane, Alexandria, VA 22314 Phone: 703-683-4877 Fax: 703-683-6692

TRAFFIC INSTRUCTIONS

TO: TRAFFIC MANAGER

Revision

DATE: September 28, 2016

RE: Donald J. Trump for President, Inc.

Caroline Kowalski

You should the following :30s spot in house titled 'Voters Speak' DJTVTSPK092716H.

EFFECTIVE IMMEDIATELY, please run the following spot in this rotation:

Voters Speak

FROM:

DJTVTSPK092716H

100%

THESE INSTRUCTIONS ARE EFFECTIVE UNTIL FURTHER NOTICE

Please sign, scan, and email confirmation of receipt to c.kowalski@americanmediaag.com.

STATION

____MARKET

INITALS

Please call 703-683-4877 with questions or problems.

FW: Trump Traffic WTXL Tally

German, Michael

Tue 9/27/2016 5:55 PM

To:WTXL Traffic <wtxltraffic@wtxl.tv>;

Michael German General Sales Manager WTXL ABC 27 1620 Commerce Blvd. Midway, Florida 52343 Direct (850) 580-9506 Mobile (850) 510-2563



From: Vitti, Jonathan [mailto:Jonathan.Vitti@KatzTVGroup.com] Sent: Tuesday, September 27, 2016 5:40 PM To: German, Michael <mgerman@wtxl.tv> Cc: WTXL Traffic <wtxltraffic@wtxl.tv> Subject: FW: Trump Traffic WTXL Tally

Hi,

The agency confirmed...

Please run 'Voters Speak' 100% until both have arrived.

Jonathan Vitti Sales Manager Katz Ad Sales Operations 125 West 55th Street | New York, NY 10019 Jonathan, Vitti@katzivgroup.com o 212.373.8142 | f 917.206.9742



From: John Jay [mailto:j.jay@americanmediaag.com] Sent: Tuesday, September 27, 2016 5:38 PM To: Vitti, Jonathan <<u>Jonathan.Vitti@KatzTVGroup.com</u>> Subject: RE: Trump Traffic WTXL Tally

Please run 'Voters Speak' 100% until both have arrived.

From: Vitti, Jonathan [mailto:Jonathan,Vitti@KatzTVGroup.com] To: John Jay Subject: Trump Traffic WTXL Tally

Hey John,

WTXL has one of the spots, but the instructions say to rotate two of them 50/50. Will the other one be coming tonight? If not, can the station run the one they have for tomorrow morning?

Thanks!

Jonathan Vitti Sales Manager Katz Ad Sales Operations 125 West 55th Street | New York, NY 10019 Jonathan.Vitti@kaizivgroup.com o 212.373.8142 | f 917.206.9742



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EXHIBIT O

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:
, American Media and Advocacy Group	
being/on behalf of: RNC/Trump for President	
a legally qualified candidate of the Republican Party	
political party for the office of:President of the United S	tates of America

in the General Election

election to be held on: Tuesday, November 8th, 2016

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):

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NA8 Form PB-18 Candidates

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

Donald J. Trump for President, Inc.

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:

Tim Jost

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

 10/4/16
 June

 Date
 Signature

 To Be Signed By Station Representative

 Image: Accepted
 Image: Accepted in Part

Signature

Printed Name

Title

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2

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:

Donald J. Trump for Presiden

(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)

I.

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.

M 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.

Wesdert IIC indidate or authorized committee signature of JOHN FERR date

printed name

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3

NAB Form PB-18 Candidates

AGREED UPON SCHEDULE

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

Broadcast Longth	Time of Day, Rotation of Package	Days	Class	Times per Weik	Number of Weeks
See Schedule	See Schedule	See Schedule	See Schedule	See Schedule	See Schedule
		2			1

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.

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1 B C

-i));

EXHIBIT P

STATION ISSUE ADVERTISING REQUEST SHEET

(to be filled out and kept on file for public inspection)

To: Public File Station: KMGH From: Tracey Hunter Date: October 14, 2016 This request was:

Accepted

Agency: Red Eagle Media Group Address: 815 Slaters Lane Alexandria, VA 22314

Phone #: 202-872-1155

Contact: Ben Angle

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

Issue: Pro - Donald Trump and gun rights

Candidate Mentioned:Election Mentioned:Hillary ClintonGeneral Election 11/18/2016Donald TrumpJonald TrumpSponsor: National Rifle Association for American - Institute for Legislative Action

Address: 11250 Waples Mill Road Fairfax, VA 22030

Phone: 800-672-3888

Executive Officer(s): Mary Rose Adkins Wayne LaPierre *Title:* Treasurer CEO

....

1 (F)

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EXHIBIT Q

CONTRACT

WVEC EWS 613 Woodis Ave. Norfolk, VA 23510 (757)625-1313

And:

Red Eagle Media Group / POL 815 Slaters Lane Alexandria, VA 22314

	Contract / Re	vision	Alt Order	Alt Order #		
	1315389	1	08419855	ö		
Product						
NRA ILA 8285						
Contract Dates	Estimate #					
10/25/16 - 10/31/16	8285					
Advertiser			Original Date	/ Revision		
National Rifle Associa	ation		10/19/16	/ 10/19/16		
	Billing Cycle	Billing	Calendar	Cash/Trade		
	EOM/EOC	Broado	cast	Cash		
	Property	Accou	nt Executive	Sales Office		
	WVEC	Jay Sn	nith	Telerep Washir		
	Special Hand	ling				
	Demographic					
	Adults 35-64					
	Agy Code	Advert	iser Code	Product 1/2		
	C91 000e	375	1301 0000	994		
	Agency Ref		Advertise	er Ref		
	20245AG		39533			

*Line Ch Start Date End Date Description	Start/End Time	Spots/ Days Length Week Ra	te Rtn TypeSpots	Amount
N 1 All 10/28/16 10/28/16 Local News @ 5p M-F <u>Start Date End Date Weekdays Spots/Week</u> Week: 10/24/16 10/30/161 1	5-530p <u>Rate</u> \$255.00	:30	NM 1	\$255.00
N 2 All 10/28/16 10/28/16 Local News @ 5a M-F <u>Start Date End Date Weekdays Spots/Week</u> Week: 10/24/16 10/30/161 1	5-6a <u>Rate</u> \$225.00	:30	NM. 1	\$225.00
N 3 All 10/28/16 10/28/16 Local News @ 530p M-F <u>Start Date End Date Weekdays Spots/Week</u> Week: 10/24/16 10/30/161 1	530-6p <u>Rate</u> \$225.00	:30	NM 1	\$225.00
N 4 All 10/28/16 10/28/16 Local News @ 6p M-F <u>Start Date End Date Weekdays Spots/Week</u> Week: 10/24/16 10/30/161 1	6-630p <u>Rate</u> \$600.00	:30	NM 1	\$600.00
N 5 All 10/28/16 10/28/16 Wheel of Fortune 7-730p <u>Start Date End Date Weekdays Spots/Week</u> Week: 10/24/16 10/30/161 1	7-730p <u>Rate</u> \$825.00	:30	NM 1	\$825.00
N 6 All 10/28/16 10/28/16 Good Morning America <u>Start Date</u> End Date <u>Weekdays</u> <u>Spots/Week</u> Week: 10/24/16 10/30/161 1	7-9a <u>Rate</u> \$450.00	:30	NM 1	\$450.00
N 7 All 10/28/16 10/28/16 Jeopardy 730-8p <u>Start Date End Date Weekdays Spots/Week</u> Week: 10/24/16 10/30/161 1	730-8p <u>Rate</u> \$850.00	:30	NM 1	\$850.00
N 8 All 10/28/16 10/28/16 Fri Prime A <u>Start Date End Date Weekdays</u> <u>Spots/Week</u> Week: 10/24/16 10/30/161 1	8-9p <u>Rate</u> \$1,550.00	:30	NM 1	\$1,550.00
N 9 All 10/28/16 10/28/16 Fri Prime B <u>Start Date</u> End Date <u>Weekdays</u> <u>Spots/Week</u> Week: 10/24/16 10/30/161 1	9-10p <u>Rate</u> \$1,200.00	:30	NM 1	\$1,200.00
N 10 All 10/31/16 10/31/16 Mon Prime C <u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> Week: 10/31/16 11/06/16 1 1	10-11p <u>Rate</u> \$750.00	:30	NM 1	\$750.00
N 11 All 10/31/16 10/31/16 Local News @ 5p M-F Start Date End Date Weekdays Spots/Week	5-530p <u>Rate</u>	:30	NM 1	\$255.00

(* Line Transactions: N = New, E = Edited, D = Deleted) Standard Terms: Your purchase of advertising is subject to the TEGNA Media Standard Advertising Terms and Conditions ("Standard Terms"), which are available at http://bit ly/2eyrbCA, as well as on the 'Advertise With Ue' section under the 'About' tab of Station's website. You will be deemed to have accepted our Standard Terms upon the earliest of (i) the date you sign the Insertion Order to which this Contract relates, (ii) the date the campaign contemplated by this Contract first launches, or (iii) the date on which you pay any amounts specified on an invoice related to the Contract.

Non-Discrimination: TEGNA Media and its stations do not discriminate in advertising contracts on the basis of race, gender or ethnicity. Any provision in any order or agreement for advertising that purports to discriminate on the basis of race, gender or ethnicity, even if handwritten, typed or otherwise made a part of the particular contract, is hereby rejected.

	odis Ave.				Contract / Revisio 1315389 /	n <u>Alt O</u> 0841	rder # 9855	
	VA 23510		Contract Dates 10/25/16 - 10/31		Product NRA ILA 8285	Estim 8285	brikeliji Saytmatio	
			Advertiser			Original Da		
		l	National Rifle /	Association				
*Line Ch Start Date End Date D	Description	Start/End Time	Days	S Length V	ipots/ Veek Rate F	Rtn TypeS	pols	Amount
Start Date End Date Wee	ekdays <u>Spots/Week</u>	Rate \$255.00				1		
NECESSIE 20	ocal News @ 5a M-F	5-6a		:30		NM	1	\$225.00
	<u>ekdays Spots/Week</u> 1	<u>Rate</u> \$225.00						
	ocal News @ 530p M-F ekdays Spots/Week	530-6p Rate		:30		NM	1	\$225.00
Week: 10/31/16 11/06/16 1	1	\$225.00						
	ocal News @ 6p M-F <u>ekdays Spots/Week</u> 1	6-630p <u>Rate</u> \$600.00		:30		NM	1	\$600.00
Start Date End Date Wee	Vheel of Fortune 7-730p akdays Spots/Week	7-730p <u>Rate</u> \$825.00		:30		ММ	1	\$825.00
N 16 All 10/31/16 10/31/16 C Start Date End Date Wee	Good Morning America ekdays Spots/Week	7-9a <u>Rate</u> \$450.00		:30		NM	1	\$450.00
N 17 All 10/31/16 10/31/16 J Start Date End Date Wee	eopardy 730-8p ekdays Spots/Week	730-8p Rate \$850.00		:30		NM	1	\$850.00
N 18 All 10/29/16 10/29/16 N Start Date End Date Wee	ICAA Football Game 1 <u>ekdays Spots/Week</u>	12-330p Rate \$350.00		:30		NM	1	\$350.00
N 19 All 10/29/16 10/29/16 N Start Date End Date Wee	ICAA Football Game 2 akdays Spots/Week	330-7p Rate \$650.00		:30		NM	1	\$650.00
N 20 All 10/29/16 10/29/16 L	ocal News @ 6p Sa ekdays Spots/Week	6-630p Rate		:30		NM	2	\$325.00
Spot Ch Date Range	1- 1 Description Local News @ 6p Sa	\$200.00 Start/End Tit 6-630p	me Weekday		th <u>Rate</u> 30 \$200-00	<u>Type</u> NM		
See MG 20.2,20.3 2 All 10/25/16-10/28/16	Local News @ 5a M-F	5-6a	⇒⊤uWThF		\$0 \$135.00	NM		
 MG for 24.1,20.1 3 All 10/30/16-10/30/16 MG for 24.1,20.1 		10-11a		Si :3	30 \$190.00	NM		
N 21 All 10/29/16 10/29/16 S Start Date End Date Wee	SaSu 6-8a News ROS ekdays <u>Spots/Week</u> 1- 1	6-8a <u>Rate</u> \$165.00		:30		NM	1	\$165.00
N 22 All 10/29/16 10/29/16 N Start Date End Date Wee		12:00 AM-12 Rate \$900.00	:00 AN	:30		NM	1	\$900.00
N 23 All 10/29/16 10/29/16 C Start Date End Date Wee	Good Morning America Sa ekdays Spots/Week	8-9a <u>Rate</u> \$290.00		:30		NM	1	\$290.00
N 24 All 10/30/16 10/30/16 T Start Date End Date Wee	This Week Su ekdays Spots/Week	10-11a Rate		:30		NM	0	\$0.00
	1 1 Description This Week Su	\$125.00 <u>Start/End Ti</u> 10-11a	me <u>Weekday</u>		th <u>Rate</u> 30 \$125.00	<u>Type</u> NM		
		V7-V 5314 0.80		max read to est a	2	1.0		

* Line Transactions: N = New, E = Edited, D = Deleted) Standard Terms: Your purchase of advertising is subject to the TEGNA Media Standard Advertising Terms and Conditions ("Standard Terms"), which are available at http://bit/y/2oyrbCA, as well as on the 'Advertise With Us' section under the 'About' tab of Station's website. You will be deemed to have accepted our Standard Terms upon the earliest of (i) the date you sign the Insertion Order to which this Contract reletes, (ii) the date the campaign contemplated by this Contract first launches, or (iii) the date on which you pay any amounts specified on an invoice related to this Contract.

Non-Discrimination: TEGNA Media and its stations do not discriminate in advertising contracts on the basis of race, gender or ethnicity. Any provision in any order or agreement for advertising that purports to discriminate on the basis of race, gender or othenwise made a part of the particular contract, is hereby rejected

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WVEC 613 Woodis Ave. Norfolk, VA 23510 (757)625-1313		Contract Dates 10/25/16 - 10/31/16	Contract / Revision 1315389 / Product NRA ILA 8285	Alt Orde 0841985 Estimate 8285	55 3 #	
		Advertiser National Rifle Association		iginal Date 10/19/16	/ 10/19	
*Line Ch Start Date End Date Description	Start/End Time	Days Length	Spots/ Neek Rate Rtn	TypeSpc	ots	Amount
N 25 All 10/30/16 10/30/16 Superior N 25 All 10/30/16 10/30/16 Superior Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	10-11p <u>Rate</u> \$600.00	:30		NM	1	\$600.00
N 26 All 10/30/16 10/30/16 Local News @ 6p Su Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	6-630p <u>Rate</u> \$300.00	:30		NM	1	\$300.00
N 27 All 10/30/16 10/30/16 SaSu 6-8a News ROS <u>Start Date</u> End Date Weekdays Spots/Week Week: 10/24/16 10/30/161 1	6-8a <u>Rate</u> \$200.00	:30		NM	1	\$200.00
N 28 All 10/30/16 10/30/16 Good Morning America Su Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	8-9a <u>Rate</u> \$250.00	:30		NM	1	\$250.00
N 29 All 10/27/16 10/27/16 Local News @ 5p M-F Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	5-530p <u>Rate</u> \$255.00	:30		NM	1	\$255.00
N 30 All 10/27/16 10/27/16 Local News @ 5a M-F Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	5-6a <u>Rate</u> \$225.00	:30		NM	1	\$225.0
N 31 All 10/27/16 10/27/16 Local News @ 530p M-F Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	530-6p <u>Rate</u> \$225.00	:30		NM	1	\$225 .00
N 32 All 10/27/16 10/27/16 Local News @ 6p M-F Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	6-630p <u>Rate</u> \$600.00	:30		NM	1	\$600.0
N 33 All 10/27/16 10/27/16 Weel of Fortune 7-730p Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	7-730p <u>Rate</u> \$825.00	:30		NM	1	\$825.0
N 34 All 10/27/16 10/27/16 Good Morning America Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	7-9a <u>Rate</u> \$450.00	:30		NM	1	\$450.0
N 35 All 10/27/16 10/27/16 Jeopardy 730-8p Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	730-8p <u>Rate</u> \$850.00	:30		NM	1	\$850.0
N 36 All 10/25/16 10/25/16 Local News @ 5p M-F Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 -1 1	5-530p Rate \$255.00	:30		NM	1	\$255.0
N 37 All 10/25/16 10/25/16 Local News @ 5a M-F Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 -1 1	5-6a Rate \$225.00	:30		NM	1	\$225.0
N 38 All 10/25/16 10/25/16 Local News @ 530p M-F Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 -1 1	530-6p Rate \$225.00	:30		NM	1	\$225.0
N 39 Ali 10/25/16 10/25/16 Local News @ 6p M-F Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 -1 1	6-630p Rate \$600.00	:30		NM	1	\$600.0
Veek 10/24/10 10/30/10 1 N 40 All 10/25/16 10/25/16 Wheel of Fortune 7-730p Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 -1 1	7-730p Rate \$825.00	:30		NM	1	\$825.0
N 41 All 10/25/16 10/25/16 Good Morning America	7-9a	:30		NM	1	\$450.0

(* Line Transactions: N = New, E = Edited, D = Deleted) Standard Terms: Your purchase of advartising is subject to the TEGNA Media Standard Advartising Terms and Conditions (*Standard Terms*), which are evailable at http://biLly/2eyrbCA, as well as on the 'Advartise With Us' saction under the 'About' tab of Station's website. You will be deemed to have accepted our Standard Terms upon the earliest of (i) the date you sign the Insertion Order to which this Contract relates, (ii) the date the campsign contemplated by this Contract first launches, or (iii) the date on which you pay any emounts specified on an invoice related to this Contract.

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Start Date End Date Weekdays Spots/Week Rate Week: 10/25/16 Tue Prime A 8-9p :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Week: 10/26/16 10/26/16 10/26/16 10/26/16 10/26/16 Spots/Week Rate :30 NM 1 Week: 10/24/16 10/26/16 Local News @ 5p M-F 5-530p :30 NM 1 <td< th=""><th></th></td<>	
*Line Ch Start Date End Date Description Time Days Length Week Rate Rtn Type Spots A Week: 10/24/16 10/30/16 -1 1 \$450.00	3 3
Start Date 10/24/16 End Date 10/30/16 Weekdays -1 Spots/Week \$450.00 Rate \$450.00 N 42 All 10/25/16 10/25/16 Jeopardy 730-8p 730-8p 30 NM 1 Start Date Week: 10/24/16 End Date 10/30/16 Weekdays -1 Spots/Week Rate 8850.00 30 NM 1 N 43 All 10/25/16 10/25/16 Tue Prime A 8-9p 30 NM 1 Start Date Week: End Date 10/26/16 Weekdays -1 Spots/Week 9975.00 Rate 9975.00 30 NM 1 Start Date Week: End Date 10/30/16 Weekdays -1 Spots/Week 9975.00 Rate 9975.00 30 NM 1 Start Date Week: End Date 10/30/16 Weekdays -1 Spots/Week 850.00 Rate 975.00 30 NM 1 N 45 All 10/26/16 Local News @ 5p M-F 5-530p :30 NM 1 Start Date Week: In/26/16 Local News @ 5p M-F 5-63 :30 NM 1 Start Date Week: I	mount
N 42 All 10/25/16 10/25/16 Jeopardy 730-8p 730-8p :30 NM 1 Start Date End Date Weekdays Spots/Week Rate \$850.00 1 N 43 All 10/25/16 10/25/16 Tue Prime A 8-9p :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Week: 10/24/16 10/26/16 10/26/16 Weekdays Spots/Week Rate :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Week: 10/24/16 10/26/16 Local News @ 5p M-F 5-530p :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Week: 10/24/16 10/26/16 Local News @ 5p M-F <td></td>	
N 43 All 10/25/16 10/25/16 Tue Prime A 8-9p :30 NM 1 Start Date End Date Weekdays Spots/Week Rate \$975.00 1 1 N 44 All 10/26/16 10/26/16 10/26/16 10/26/16 10/26/16 10/26/16 NM 1 Start Date End Date Weekdays Spots/Week Rate \$30 NM 1 Start Date End Date Weekdays Spots/Week Rate \$30 NM 1 Veek: 10/26/16 10/26/16 Local News @ 5p M-F 5-530p :30 NM 1 Start Date End Date Weekdays Spots/Week Rate \$255.00 10 10 N 46 All 10/26/16 10/26/16 Local News @ 5a M-F 5-6a :30 NM 1 Start Date End Date Weekdays Spots/Week Rate \$30 NM 1 Veek: 10/26/16 10/26/16 Local News @ 5a M-F 5-6a :30 NM 1 Start Date End Da	\$850.00
N 44 All 10/26/16 10/26/16 Weekdays Spots/Week Rate :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Week: 10/24/16 10/26/16 10/26/16 Local News @ 5p M-F 5-530p :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Veek: 10/24/16 10/26/16 Local News @ 5p M-F 5-530p :30 NM 1 Week: 10/24/16 10/26/16 Local News @ 5a M-F 5-6a :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1	\$975.00
N 45 All 10/26/16 10/26/16 Local News @ 5p M-F 5-530p :30 NM 1 Start Date End Date Weekdays Spots/Week Rate \$255.00 \$30 NM 1 Week: 10/26/16 10/26/16 Local News @ 5a M-F 5-6a \$30 NM 1 Start Date End Date Weekdays Spots/Week Rate \$30 NM 1	\$650.00
N 46 All 10/26/16 10/26/16 Local News @ 5a M-F 5-6a :30 NM 1 Start Date End Date Weekdays Spots/Week Rate	\$255.00
	\$225.00
	\$225.00
N 48 All 10/26/16 10/26/16 Local News @ 6p M-F 6-630p :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Week: 10/24/16 10/30/16 1 1 \$600.00 :30 NM 1	\$600.00
	\$825.00
N 50 All 10/26/16 10/26/16 Good Morning America 7-9a :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Week: 10/30/16 1 1 \$450.00 :30 NM 1	\$450.00
N 51 All 10/26/16 10/26/16 Jeopardy 730-8p 730-8p :30 NM 1 Start Date End Date Weekdays Spots/Week Rate :30 NM 1 Week: 10/24/16 10/30/16 1 1 \$850.00 :30 NM 1	\$850.00
	1,500.00
	7,805.00
Time Period # of Spots Gross Amount Agency Comm. Net Amount	
09/26/16 -10/30/16 44 \$23,625.00 (\$3,543.75) \$20,081.25	
10/31/16 -10/31/16 8 \$4,180.00 (\$627.00) \$3,553.00	
Totals 52 \$27,805.00 (\$4,170.75) \$23,634.25	
Signature: Date:	

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NAB Form PB-18 issues

AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Date: **Station and Location:** Norfolk 10/19 WVEC

L Red Eagle Media Group

do hereby request station time concerning the following issue:

National Rifle Association of America Political Victory Fund

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

This broadcast time will be used by: NRA-PVF

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1

Pro Trump Anti Clinton

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)

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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):

NATIONAL RIFLE ASSOCIATION OF AMERICA POLITICAL VICTORY FUND 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):

Treasurer- Mary Rose Adkins

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) tenel Contact Phone Number TO BE SIGNED BY STATION REPRESENTATIVE Accepted □ Accepted in Part Rejected Penne Mars.

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EXHIBIT R

Contract Agreement Between:

And:

Print Date 10/24/16

CONTR

WVEC 613 Woodis Ave. Norfolk, VA 23510 (757)625-1313

	Contract / Re	vision	Alt Order	#
	1314096	1	08410164	1
Product TRUMP 8034				
Contract Dates	Estimate #			
10/25/16 - 10/31/16	8034			
Advertiser			Original Date	e / Revision
Donald Trump / R / Pr	esident / US		10/14/16	/ 10/24/16
	Billing Cycle	Billing	Calendar	Cash/Trade
	EOM/EOC	Broad	cast	Cash
	Property	Accou	nt Executive	Sales Office
	WVEC	Jay Sr	nith	Telerep Washir
	Special Hand	lling		
	Demographic	2		
	Adults 35-64			1
	Agy Code	Advert	iser Code	Product 1/2
		521		958

Agency Ref

Advertiser Ref

American Media & Advocacy Grp/ POL 815 Slaters Lane Alexandria, VA 22314

							9204A		10420	07	
				Start/End			Enote/				
*Line Ch	Start Date En	nd Date	Description	Time	Davs	Length	Spots/ Week	Rate Rtn	Type Sr	oots	Amount
D 1 All	the second s	_	Fri Prime C	10-11p		:30			NM	0	\$0.00
D 2 All	10/28/16 10/	/28/16	Local News @ 11p M-F	11-1135p		:30			NM	0	\$0.00
D 3 All	10/28/16 10/	/28/16	Jimmy Kimmel	1135p-1235a		:30			NM	0	\$0.00
N 4 All <u>Star</u> Week: 10/2	Date End Da	ate We	Local News @ 12p M-F eekdays Spots/Week	12-1p <u>Rate</u> \$145.00		:30			NM	0	\$0.00
<u>Spot</u> Ch 1 All	Date Range 10/24/16-10	0/30/16	Description Local News @ 12p M-F 5,65.6,65.7,65.8,65.9,65.10,6	Start/End Time 12-1p	Weekday	ind in the second se	<u>gth</u> :30	<u>Rate</u> \$145.00	<u>Type</u> NM		
D 5 All	10/28/16 10/	/28/16	TD Jakes 3-4p	3-4p		:30			NM	0	\$0.00
D 6 All	10/28/16 10/	/28/16	Local News @ 5p M-F	5-530p		:30			NM	0	\$0.00
D 7 All	10/28/16 10/	/28/16	Local News @ 5a M-F	5-6a		:30			NM	0	\$0.00
D 8 All	10/28/16 10/	/28/16	Local News @ 530p M-F	530-6p		:30			NM	0	\$0.00
D 9 All	10/28/16 10/	/28/16	Local News @ 6p M-F	6-630p		:30			NM	0	\$0.00
D 10 All	10/28/16 10/	/28/16	Local News @ 6a M-F	6-7a		:30			NM	0	\$0.00
D 11 All	10/28/16 10/	/28/16	Wheel of Fortune 7-730p	7-730p		:30			NM	0	\$0.00
D 12 All	10/28/16 10/	/28/16	Jeopardy 730-8p	730-8p		:30			NM	0	\$0.00
D 13 All	10/31/16 10/	/31/16	Mon Prime C	10-11p		:30			NM	0	\$0.00
D 14 All	10/31/16 10/	/31/16	Local News @ 11p M-F	11-1135p		:30			NM	0	\$0.00
D 15 All	10/31/16 10/	/31/16	Jimmy Kimmel	1135p-1235a		:30			NM	0	\$0.00
D 16 All	10/31/16 10/	/31/16	Local News @ 12p M-F	12-1p		:30			NM	0	\$0.00
D 17 All	10/31/16 10/	/31/16	TD Jakes 3-4p	3-4p		:30			NM	0	\$0.00
D 18 All	10/31/16 10/	/31/16	Local News @ 5p M-F	5-530p		:30			NM	0	\$0.00
D 19 All	10/31/16 10/	/31/16	Local News @ 5a M-F	5-6a		:30			NM	0	\$0.00
D 20 All	10/31/16 10/	/31/16	Local News @ 530p M-F	530-6p		:30			NM	0	\$0.00
D 21 All	10/31/16 10/	/31/16	Local News @ 6p M-F	6-630p		:30			NM	0	\$0.00
D 22 All	10/31/16 10/	/31/16	Local News @ 6a M-F	8-7a		:30			NM	0	\$0.00
D 23 All	10/31/16 10/	/31/16	Wheel of Fortune 7-730p	7-730p		:30			NM	0	\$0.00

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	Contract / Revision 1314096 /	Alt Order # 08410164
Contract Dates 10/25/16 - 10/31/16	Product TRUMP 8034	Estimate # 8034
Advertiser Donald Trump / R / Pr		Original Date / Revision 10/14/16 / 10/24/16

*Line Ch	Start Date End Da	e Description	Start/End Time	Days	Spots/ Length Week	Rate Rtn TypeS	pots	Amount
D 24 All	10/31/16 10/31/16	Jeopardy 730-8p	730-8p		:30	NM	0	\$0.00
D 25 All	10/31/16 10/31/16	Mon Prime Other	8:00 PM-10:00 PM		:30	NM	0	\$0.00
D 26 All	10/29/16 10/29/16	LN (Sa-Su)	11-1135p		:30	NM	0	\$0.00
D 27 All	10/29/16 10/29/16	NCAA Football Game 2	330-7p		:30	NM	0	\$0.00
D 28 All	10/29/16 10/29/16	Local News @ 6a Sa	6-630a		:30	NM	0	\$0.00
D 29 All	10/29/16 10/29/16	Local News @ 6p Sa	6-630p		:30	NM	0	\$0.00
D 30 All	10/29/16 10/29/16	Local News @ 630a Sa	630-7a		:30	NM	0	\$0.00
D 31 All	10/29/16 10/29/16	Local News @ 7a Sa	7-730a		:30	NM	0	\$0.00
D 32 All	10/29/16 10/29/16	PA (Sa)	7-8p		:30	NM	0	\$0,00
D 33 All	10/29/16 10/29/16	Local News @ 730a Sa	730-8a		:30	NM	0	\$0.00
D 34 All	10/29/16 10/29/16	Good Morning America Sa	8-9a		:30	NM	0	\$0.00
D 35 All	10/30/16 10/30/16	Sun Prime D	10-11p		:30	NM	0	\$0.00
D 36 All	10/30/16 10/30/16	LN (Sa-Su)	11-1135p		:30	NM	0	\$0.00
D 37 All	10/30/16 10/30/16	Local News @ 6p Su	6-630p		:30	NM	0	\$0.00
D 38 All	10/30/16 10/30/16	SaSu 6-8a News ROS	6-8a		:30	NM	0	\$0.00
D 39 All	10/30/16 10/30/16	Sun Prime A	7-8p		:30	NM	0	\$0.00
D 40 All	10/30/16 10/30/16	Good Morning America Su	8-9a		:30	NM	0	\$0.00
D 41 All	10/30/16 10/30/16	Sun Prime C	9-10p		:30	NM	Ō	\$0.00
D 42 All	10/27/16 10/27/16	Local News @ 11p M-F	11-1135p		:30	NM	0	\$0.00
D 43 All	10/27/16 10/27/16	Local News @ 12p M-F	12-1p		:30	NM	0	\$0.00
D 44 All	10/27/16 10/27/16	TD Jakes 3-4p	3-4p		:30	NM	0	\$0.00
D 45 All	10/27/16 10/27/16	Local News @ 5p M-F	5-530p		:30	NM	0	\$0.00
D 46 All	10/27/16 10/27/16	Local News @ 5a M-F	5-6a		:30	NM	0	\$0.00
D 47 All	10/27/16 10/27/16	Local News @ 530p M-F	530-6p	_	:30	NM	0	\$0.00
D 48 All	10/27/16 10/27/16	Local News @ 6p M-F	6-630p		:30	NM	0	\$0.00
D 49 All	10/27/16 10/27/16	Local News @ 6a M-F	6-7a		:30	NM	0	\$0.00
D 50 All	10/27/16 10/27/16	Wheel of Fortune 7-730p	7-730p		:30	NM	0	\$0.00
D 51 Ali	10/27/16 10/27/16	Jeopardy 730-8p	730-8p		:30	NM	0	\$0.00
D 52 All	10/25/16 10/25/16	Local News @ 11p M-F	11-1135p		:30	NM	0	\$0.00
D 53 All	10/25/16 10/25/16	Local News @ 12p M-F	12-1p		:30	NM	0	\$0.00
D 54 All	10/25/16 10/25/16	TD Jakes 3-4p	3-4p		:30	NM	0	\$0.00
D 55 All	10/25/16 10/25/16	Local News @ 5p M-F	5-530p		:30	NM	0	\$0.00
D 56 All	10/25/16 10/25/16	Local News @ 5a M-F	5-6a		:30	NM	0	\$0.00
D 57 All	10/25/16 10/25/16	Local News @ 530p M-F	530-6p		:30	NM	0	\$0.00
D 58 All	10/25/16 10/25/16	Local News @ 6p M-F	6-630p		:30	NM	0	\$0.00
D 59 All	10/25/16 10/25/16	Local News @ 6a M-F	6-7a		:30	NM	0	\$0.00
D 60 All	10/25/16 10/25/16	Wheel of Fortune 7-730p	7-730p		:30	NM	0	\$0.00
D 61 All	10/25/16 10/25/16	Jeopardy 730-8p	730-8p		:30	NM	0	\$0.00
D 62 All	10/26/16 10/26/16	Wed Prime C	10-11p		:30	NM	0	\$0.00
D 63 All	10/26/16 10/26/16		11-1135p		:30	NM	0	\$0.00
D 64 All	10/26/16 10/26/16		1135p-1235a		:30	NM	0	\$0.00

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Contract Agreement Between:

WVEC NEWS 613 Woodls Ave. Norfolk, VA 23510 (757)625-1313

	Contract / Revision 1314096 /	Alt Order # 08410164
Contract Dates 10/25/16 - 10/31/16	Product TRUMP 8034	Estimate # 8034
Advertiser Donald Trump / R / Pr		riginal Date / Revision 10/14/16 / 10/24/16

*Line Ch Start Date End Date Description	Start/End Time	Spots/ Days Length Week Rat	e Rtn TypeS	pots	Amount
D 65 All 10/26/16 10/26/16 Local News @ 12p M-F	12-1p	:30	NM	0	\$0.00
D 66 All 10/26/16 10/26/16 TD Jakes 3-4p	3-4p	:30	NM	0	\$0.00
D 67 All 10/26/16 10/26/16 Local News @ 5p M-F	5-530p	:30	NM	0	\$0.00
D 68 All 10/26/16 10/26/16 Local News @ 5a M-F	5-6a	:30	NM	0	\$0.00
D 69 All 10/26/16 10/26/16 Local News @ 530p M-F	530-6p	:30	NM	0	\$0.00
D 70 All 10/26/16 10/26/16 Local News @ 6p M-F	6-630p	:30	NM	o	\$0.00
D 71 All 10/26/16 10/26/16 Local News @ 6a M-F	6-7a	:30	NM	0	\$0.00
D 72 All 10/26/16 10/26/16 Wheel of Fortune 7-730p	7-730p	:30	NM	0	\$0.00
D 73 All 10/26/16 10/26/16 Jeopardy 730-8p	730-8p	:30	NM	0	\$0.00
D 74 All 10/26/16 10/26/16 Wed Prime B	9-10p	:30	NM	0	\$0.00
	10-11p	:30	NM	1	\$640.00
N 75 All 10/28/16 10/28/16 Fri Prime C Start Date End Date Weekdays Spots/Week	Rate		1 NIVI	1.0	40 +0.00
Week: 10/24/16 10/30/161 1	\$640.00				
N 76 All 10/28/16 10/28/16 Local News @ 11p M-F	11-1135p	:30	NM	1	\$255.00
Start Date End Date Weekdays Spots/Week	Rate				
	\$255.00				¢65.00
N 77 All 10/28/16 10/28/16 TD Jakes 3-4p Start Date End Date Weekdays Spots/Week	3-4p <u>Rate</u>	:30	NM	1	\$65.00
Week: 10/24/16 10/30/161 1	\$65.00				
N 78 All 10/28/16 10/28/16 Local News @ 5a M-F	5-6a	:30	NM	1	\$85.00
Start Date End Date Weekdays Spots/Week	Rate		20000		
Week: 10/24/16 10/30/161 1	\$85.00	12120			
N 79 All 10/28/16 10/28/16 Local News @ 6a M-F	6-7a	:30	NM	1	\$220,00
Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	<u>Rate</u> \$220.00				
N 80 All 10/28/16 10/28/16 Jeopardy 730-8p	730-8p	:30	NM	1	\$540.00
Start Date End Date Weekdays Spots/Week	Rate				
Week: 10/24/16 10/30/161 1	\$540.00				
N 81 All 10/28/16 10/28/16 Wheel of Fortune 7-730p	7-730p	:30	NM	1	\$520.00
Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	<u>Rate</u> \$520.00				
N 82 All 10/31/16 10/31/16 Local News @ 11p M-F	11-1135p	:30	NM	1	\$255.00
Start Date End Date Weekdays Spots/Week	Rate	100			4200.00
Week: 10/31/16 11/06/16 1 1	\$255.00				
N 83 All 10/31/16 10/31/16 Local News @ 12p M-F	12- 1p	:30	NM	1	\$95.00
Start Date End Date Weekdays Spots/Week Week: 10/31/16 11/06/16 1 1	<u>Rate</u> \$95.00				
Week: 10/31/16 11/06/16 1 1 Soot Ch Date Range Description	Start/End Time	Weekdays Length Ra	te <u>Type</u>		
1 All 10/31/16-11/06/16 Local News @ 12p M-F	12-1p	M :30 \$95.0	The second se		
N 84 All 10/31/16 10/31/16 TD Jakes 3-4p	3-4p	:30	NM	1	\$65.00
Start Date End Date Weekdays Spots/Week	Rate				
Week: 10/31/16 11/06/16 1 1	\$65.00	12-12-			\$400.0C
N 85 All 10/31/16 10/31/16 Local News @ 5p M-F	5-530p Rate	:30	NM	1	\$120.00
Start Date End Date Weekdays Spots/Week Week: 10/31/16 11/06/16 1 1	\$120.00				
N 86 All 10/31/16 10/31/16 Local News @ 5a M-F	5-6a	:30	NM	1	\$85.00
Start Date End Date Weekdays Spots/Week	Rate	1978 - 1978 - 1978 - 1978 - 1978 - 1978 - 1978 - 1978 - 1978 - 1978 - 1978 - 1978 - 1978 - 1978 - 1978 - 1978 -			
Week: 10/31/16 11/06/16 1 1	\$85.00		.1		

(* Line Transactions: N = New, E = Edited, D = Deleted) Standard Terms: Your purchase of advertising is subject to the TEGNA Media Standard Advertising Terms and Conditions (*Standard Terms"), which are available at http://bit.ly/2eyrbCA, as well as on the 'Advertise With Us' section under the 'About' tab of Station's website. You will be deemed to have accepted our Standard Terms upon the earliest of (i) the date you sign the insertion Order to which this Contract relates, (ii) the date the campaign contemplated by this Contract first launches, or (iii) the date on which you pay any amounts epecified on an Invoice related to the Contract.

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Contract Agreement Between:

WVEC 613 Woodis Ave.			Contract / Revision 1314096 /	0 <u>Ait O</u> 0841	rder # 0164	
Norfolk, VA 23510 (757)625-1313		Contract Dates 10/25/16 - 10/31/16	Product TRUMP 8034	Estin 8034	nate #	
		Advertiser		Original Da		
		Donald Trump / R / Presid		10/14/16	5 / 10/2	24/16
	Start/End	5	Spots/			
*Line Ch Start Date End Date Description	Time	Days Length	•	tn Type S	Spots	Amount
Start Date End Date Weekdays Spots/Week	Rate					
N 87 All 10/31/16 10/31/16 Local News @ 6a M-F <u>Start Date</u> End Date Weekdays Spots/Week Week: 10/31/16 11/06/16 1 1	6-7a <u>Rate</u> \$220.00	:30		NM	1	\$220.00
N 88 All 10/31/16 10/31/16 Jeopardy 730-8p <u>Start Date End Date Weekdays Spots/Week</u> Week: 10/31/16 11/06/16 1 1	730-8p <u>Rate</u> \$540.00	:30		NM	1	\$540.00
N 89 All 10/31/16 10/31/16 Wheel of Fortune 7-730p Start Date End Date Weekdays Spots/Week	7-730p Rate	:30		NM	1	\$520.00
Week: 10/31/16 11/06/16 1 1	\$520.00					Acoo 00
N 90 All 10/29/16 10/29/16 NCAA Football Game 2 <u>Start Date</u> End Date Weekdays Spots/Week Week: 10/24/16 10/30/161- 1	330-7p <u>Rate</u> \$590.00	:30		NM	1	\$590.00
N 91 All 10/29/16 10/29/16 Local News @ 630a Sa <u>Start Date End Date Weekdays Spots/Week</u> Week: 10/24/16 10/30/161- 1	630-7a <u>Rate</u> \$115.00	:30		NM	1	\$115.00
N 92 All 10/29/16 10/29/16 Local News @ 6a Sa <u>Start Date</u> End Date Weekdays Spots/Week Week: 10/24/16 10/30/161- 1	6-630a <u>Rate</u> \$100.00	:30		NM	1	\$100.00
Spot Ch Date Range Description 1 All 10/24/16-10/30/16 Local News @ 6a Sa	<u>Start/End Ti</u> 6-630a		<u>th Rate</u> 30 \$100.00	Type NM		
D 93 All 10/29/16 10/29/16 PA (Sa)	7-8p	:30		NM	0	\$0.00
N 94 All 10/29/16 10/29/16 Local News @ 730a Sa <u>Start Date</u> End Date Weekdays <u>Spots/Week</u> Week: 10/24/16 10/30/161- 1	730-8a <u>Rate</u> \$130.00	:30		NM	1	\$130.00
N 95 All 10/29/16 10/29/16 Local News @ 7a Sa <u>Start Date</u> End Date Weekdays Spots/Week Week: 10/24/16 10/30/161- 1	7-730a <u>Rate</u> \$120.00	:30		NM	1	\$120.00
N 96 All 10/29/16 10/29/16 PA (Sa) <u>Start Date End Date Weekdays Spots/Week</u> Week: 10/24/16 10/30/161- 1	7-8p <u>Rate</u> \$185.00	:30		NM	1	\$185.00
N 97 All 10/29/16 10/29/16 Good Morning America Sa Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1- 1	8-9a <u>Rate</u> \$235.00	:30		NM	1	\$235.00
Spot Ch Date Range Description 1 All 10/24/16-10/30/16 Good Morning America Sa	Start/End Ti 8-9a	Sa	<u>ith Rate</u> 30 \$235.00	<u>Type</u> NM		****
N 98 All 10/30/16 10/30/16 Sun Prime D Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1 Spot Ch Date Range Description	10-11p <u>Rate</u> \$390.00 Start/End Ti	:30 ime Weekdays Leng	th Rate	NM Type	1	\$390.00
Sport Chi Date Hange Description 1 All 10/24/16-10/30/16 Sun Prime D N 99 All 10/30/16 10/30/16 Local News @ 6p Su	10-11p 6-630p	the second se	30 \$390.00	NM	1	\$220.00
Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	8-0300 Rate \$220.00					
N 100 All 10/30/16 10/30/16 SaSu 6-8a News ROS <u>Start Date End Date Weekdays Spots/Week</u> Week: 10/24/16 10/30/161 1	6-8a <u>Rate</u> \$110.00	:30		NM	Ť	\$110.00
N 101 All 10/28/16 10/28/16 Local News @ 5p M-F	5-530p	:30		NM	1	\$120.00
Start Date End Date Weekdays Spots/Week	Rate					

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WVEC 613 Woodis Ave. Norfolk, VA 23510 (757)625-1313		Contract Dates 10/25/16 - 10/31/16	Contract / Revisio 1314096 / Product TRUMP 8034	n <u>Alt O</u> 0841 Estirr 8034	ate #	
		Advertiser		Original Da	te / Revi	sion
		Donald Trump / R / Pres	sic	Concerning the Concerning of the Concerning	/ 10	
*Line Ch Start Date End Date Description	Start/End Time	Days Length	Spots/ Week Rate f	Rtn Types	Spots	Amount
Start Date End Date Weekdays Spots/Week Week: 10/24/16 10/30/16 1 1	Rate \$120.00					
N 102 All 10/31/16 10/31/16 Local News @ 530p M-F <u>Start Date End Date Weekdays</u> <u>Spots/Week</u> Week: 10/31/16 11/06/16 1 1	530-6p <u>Rate</u> \$165.00	;30		NM	1	\$165.00
N 103 All 10/29/16 10/29/16 LN (Sa-Su) <u>Start Date End Date Weekdays</u> Spots/Week Week: 10/24/16 10/30/161- 1	11-1135p <u>Rate</u> \$255.00	:30		NM	1	\$255.00
N 104 All 10/30/16 10/30/16 Sun Prime A <u>Start Date</u> End Date Weekdays Spots/Week Week: 10/24/16 10/30/161 1	7-8р <u>Rate</u> \$395.00	:30		NM	1	\$395. 0 0
N 105 All 10/30/16 10/30/16 Good Morning America Su <u>Start Date</u> End Date Weekdays Spots/Week Week: 10/24/16 10/30/161 1	8-9a <u>Rate</u> \$150.00	:30		NM	1	\$150.00
N 106 All 10/27/16 10/27/16 Local News @ 12p M-F <u>Start Date</u> End Date Weekdays Spots/Week Week: 10/24/16 10/30/161 1	12-1p <u>Rate</u> \$95.00	:30		NM	1	\$95.00
N 107 All 10/27/16 10/27/16 Local News @ 530p M-F <u>Start Date</u> End Date Weekdays Spots/Week Week: 10/24/16 10/30/161 1	530-6p <u>Rate</u> \$165.00	:30		NM	1	\$165.00
N 108 All 10/27/16 10/27/16 Local News @ 6p M-F <u>Start Date</u> End Date Week: 10/24/16 10/30/161 1	6-630p <u>Rate</u> \$415.00	:30		NM	1	\$415.00
		Totals	0.00		33	\$8,180.00
Time Period # of Spots Gross Amount Ag	gency Comm	the second s				
09/26/16 -10/30/16 24 \$6,115.00	(\$917.25					
10/31/16 -10/31/16 9 \$2,065.00	(\$309.75)	and the second se				
Totals 33 \$8,180.00	(\$1,227.00)) \$6,953.00				

Signature:

Date:

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NAB Form PB-18 Candidates

AGREEMENT FORM FOR POLITICAL CANDIDATE ADVERTISEMENTS

(check applicable box)		
FEDERAL	CANDIDATE	S 1

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:
WVEC	Nor folk	10/24
I. American Media a	nd Advocacy Group	,
being/on behalf of: Dona	ald J. Trump for Pres	ident, Inc,
a legally gualified candidat	te of the Republican Pa	irty
political party for the office	of:	ed States of America
in the General Electi	on	2
	iesday, November 8,	2016

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 propo	osed schedule	with charges	(if available):	\$ 6,95	53. Ne

Pro Trump Anti Clinton

#1314096 Rev

NAB Form PB-18 Candidates

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

Donald J. Trump for President, Inc.

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:

Tim Jost

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 enle Signature Date To Be Signed By Station Representative Rejected Accepted in Part Accepted Title

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:

, Donald J. Trump for President, Inc.

(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.

Dorold J. Thup f. Acoulut 11C

signature of candidate or authorized committee

printed name

date

1.4

- 8

EXHIBIT S

STATION ISSUE ADVERTISING REQUEST SHEET

(to be filled out and kept on file for public inspection)

To: Public File Station: WFTX From: Sharon Painter Date: October 28, 2016 This request was:

Accepted

Agency: Red Eagle Meida Group Address: 815 Slaters Lane Alexandria, VA 22314

Phone #: 703-683-4877

Contact: Caroline Kowalski

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

Issue: 2nd Amendment | NRA Membership | NRA Foundation

Candidate Mentioned: Anti- Clinton Anti- Murphy Sponsor: National Rifle Association for America- Political Victory Fund

Address: 11250 Waples Mill Road Fairfax, VA 22030

Phone: 800 672 3888

Executive Officer(s): Wayne LaPierre Mary Rose Adkins *Election Mentioned:* General Election 11/8/2016

Title: CEO Treasurer

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EXHIBIT T



WEAR Mobile 4990 Mobile Hwy Pensacola, FL 32506

American Media & Advocacy Group 815 Slaters Ln Alexandria, VA 22314

	MUR755300123		
Contract # Schedule Dates Advertiser Agency Product Brand Salesperson Sales Office Buyer Name Phone/Fax CPE Account Types Billing Type	2654915 11/01/16-11/07/16 Donald Trump for President-R (107314) American Media & Advocacy Group (9105) POLITICAL CANDIDATE (ns) (1186) 521/962/7999 (867869) Millennium/DC, Washington DC (1108) Millennium Washington DC MediaAssistant,, / 521/962/7999 National/Political Candidate Agency BRD Weekly/Irregular	Date Entered Last Modified Entered By CO-OP Headline # Demo Order Type Package Deal Commission % Commission Net Total Sales Tex	10/05/16 11/03/16 Grace Connors No ECR25323889 A18+ Normal 15.00 \$4,417.50 \$25,032.50
Comments	Florida Separation: 30 rachel chason REV	ISTON	

Spots -	
73	\$29,450.00
73	\$29,450.00

_					Run Time	- C0		Mo T	Ter 1	We Th	Fr	Sa	Su	Spots	Rate	Total	Station	Comments	Entered
Ine	Line Type / Break Type (Ref #)	Dates	Sec				-	1	1	1	1			1	\$75.00	\$75.00	Mobile (WEAR)	3-MORN 5-530AM	10/5/16
1.0	Normal Line / News (11.4)	11/02/16-11/02/16	4	:30	0 5A- News-3 In The S-530a	e morning				-								3-MORN 5-530AM	10/5/16
2.0	Normal Line / News (1)	11/03/16-11/03/16	4	:30	0 5A- News-3 In The	Morning				1				1	\$75.00	\$75.00	Mobile (WEAR)	5-110/41 5 550/01	
		11/07/16-11/07/16		•30	5-530a D SA- News-3 In The	e Morning	+	1	Ì	2			1	1	\$75.00	\$75.00	Mobile (WEAR)	3-MORN 5-530AM	10/5/16
3.0	Normal Line / News (1)	11/07/10-11/07/10			5-530a		_	_	_		+					#13E 00	Mobile (WEAR)	3-MORN 530-6AM	10/5/16
4.0	Normal Line / News (2)	11/01/16-11/01/16	4	:30	0 5:30A- News-3 In Morning 530-6a	The		1	1	12				1	\$125.00	\$123,00			_
		14/02/145 11/02/115		.30	0 5:30A- News-3 In	The				1 .	1	1		1	\$125.00	\$125.00	Mobile (WEAR)	3-MORN 530-6AM	10/5/16
5.0	Normal Line / News (2)	11/02/16-11/02/16			Morning 530-6a		-	4	-		-	-	-		tune not	++2E 0	Mobile (WEAR)	3-MORN 530-6AM	10/5/16
6.0	Normal Line / News (2)	11/07/16-11/07/16	4	:34	30 5:30A- News-3 In Morning 530-6a	The		1		6 R.				1	\$125.00	\$125.00			_
-				.7	30 GA- News-3 In The	e Mornina	+	1	1		1	1					Mobile (WEAR)	3-MORN 6-7AM	10/5/16
7.0	Revised Line / News (3)	11/01/16-11/01/16			6-7a		_	1	_		-	<u> </u>	<u> </u>				Mobile (WEAR)	3-MORN 6-7AM	10/31/2
7.:	1 Normal Line / News (3)	11/01/16-11/01/16	1 2	:3	30 6A- News-3 In Th	e Morning			1					1	\$450.00	\$450.00	MODBE (WEAK)		
			-		6-7a 30 6A- News-3 In Th	e Morrano	-			1	1	1					Mobile (WEAR)	3-MORN 6-7AM	10/5/16
8.	Revised Line / News (3)	11/03/16-11/03/16	- 4 - 3	1 .3	6-7a	ic manning					(1) 		1	\vdash +			· · · · · · · · · · · · · · · · · · ·		
24				-		CONF		NAA		ON	C	ON	TF	SAC	Г				
						CON	IIX	101/-	111		0			0.00		Comments:			
cente	d-Agency/Advertiser:			Date:	A	ccepted-Stati	ion:								Date:	Comments.		Ya .	
aapta																			

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.

WEAR Mobile 4990 Mobile Hwy Pensacola, FL 32506 American Media & Advocacy Group 815 Slaters Ln Alexandria, VA 22314	Contract # Schedule Dates Advertiser Agency Product Brand Salesperson Sales Office Buyer Name Phone/Fax CPE Account Types Billing Type Comments	MUR755300124 26554915 11/01/16-11/07/16 Donald Trump for President-R (107314) American Media & Advocacy Group (9105) POLITICAL CANDIDATE (ns) (1186) 521/962/7999 (867869) Millennium/DC, Washington DC (1108) Millennium Washington DC MediaAssistant,, / 521/962/7999 National/Political Candidate Agency BRD Weekly/Irregular Florida Separation: 30 archel chason	Date Entered Last Modified Entered By CO-OP Headlino # Demo Order Type Package Deal Commission % Commission Net Total Sales Tax	10/05/16 11/03/16 Grace Connors No ECR25323889 A18+ Normal 15.00 \$4,417.50 \$25,032.50	Mobile (WEAR) By Broadcast Month Nov. 2016 Grand Total:	73	<u>Rate</u> \$29,450.00 \$29,450.00
					-		

Line Type / Break Type (Ref #)	Dates			Run Times	: IN	JWI	l Mo	Tu	We T	h Fr	Sa	Sul	Spots	Rate	Total	Station		_
	11/03/16-11/03/16	Sec	Length	0 6A- News-3 In The M			1	1	1				1	\$450.00	\$450.00	Mobile (WEAR)	3-MORN 6-7AM	10/31/1
mal Line / News (3)	11/03/10-11/03/10			6-7a		_						-	-+			Mobile (WEAR)	3-MORN 6-7AM	10/5/16
ised Line / News (3)	11/04/16-11/04/16	2	:3	6A- News-3 In The A	Noming				5	1								
mai Line / News (3)	11/04/16-11/04/16	2	:3	6A- News-3 In The M	Morning					1			1	\$450.00	\$450.00	Mobile (WEAR)	3-MORN 6-7AM	10/31/1
						-			1	1		8				Mobile (WEAR)	3-MORN 6-7AM	10/5/16
ised Line / News (4)	11/02/16-11/02/16	2	:3	Morning 6-7a	ne -				<u> </u>								2. MODN 6-7AM	10/31/1
mal Line / News (4)	11/02/16-11/02/16	2	:3		Moming				1	1			1	\$450.00	\$450.00	MODIRE (WEAK)	5-10141 0 7741	021015
	11/02/15 11/02/15				he				1	1						Mobile (WEAR)	3-MORN 6-7AM	10/5/16
rised Line / News (4)	11/03/16-11/03/16	-		Morning 6-7a		_		_			<u> </u>	_		4450.00	£450 M	Mobile (WEAR)	3-MORN 6-7AM	10/31/1
mal Line / News (4)	11/03/16-11/03/16	2	:3		Morning					1			1	\$450.00	4-20.04			10/5140
rised Line / News (4)	11/04/16-11/04/16	2	:3	30 6:30A- News-3 In T	he					1						Mobile (WEAR)	3-MORN 6-7AM	10/5/16
		-			Momina	-				11	t		1	\$450.00	\$450.0	Mobile (WEAR)	3-MORN 6-7AM	10/31/1
rmal Line / News (4)	11/04/16-11/04/16	2		6-7a	MORENY	_					1							
						-11	284	AT		1.00	ON	TC	AC	r				
					JOIN	-11-	KIVI/	AI	IUN			11	AU					
jency/Advertiser:			Date:	Acc	epted-Sta	tion:	:							Date:	Comments.			
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CONFIRMATION CONTRACT

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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.

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Accepted-Station:

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:30 8A- ABC-Good Morning

:30 7A- ABC-Good Morning

21.0 Revised Line / SPOT (6)

21.1 Normal Line / SPOT (6)

Accepted-Agency/Advertiser:

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10/31/16

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CONFIRMATION CONTRACT

5.14

Date: Comments:

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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.

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· Date:

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Accepted-Station:

B/E Bookend P/B Piggy Back

Accepted-Agency/Advertiser:

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Printed At: 05:47 PM on Thursday, November 3 2016

Page 5 of 12

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Accepted-Agency/Advertiser:

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 Printed At: 05:47 PM on Thursday, November 3 2016

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Page 7 of 12

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Billing Type Weekly/Irregular Comments Florida Separation: 30 rachel chason	2				
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60.0 Normal Line / News (17) 11/05/16-11/05/16 4 :30/10:30* News Channel 3 61.0 Normal Line / News (18) 11/06/16-11/06/16 4 :30/10:30* News Channel 3		90.00 \$90.00	Mobile (WEAR) Mobile (WEAR) Mobile (WEAR)	J KIMMELI-ABC	10/5/ 10/5/ 10/5/

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	Tur (funds Turs	- /DoF #\	Dates	Ser	Length	Ru	un Times	SPW M	οΤι	u We	Th	Fr Sa	Su	Spots	Rate		Tota!		Station	Comments	
	ne Type / Break Type	_	Dates	-	Length	-		SPW M	о Ті	u We		Fr Sa	Su	Spots 1	Rate \$90	0.00		Mobile (W		J KIMMELI-ABC	10/21/1
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64.1 Normal 65.0 Normal 66.0 Normal 67.0 Normal 68.0 Normal	al Line / SPOT (19) al Line / SPOT (19) al Line / SPOT (20) al Line / SPOT (20)) 1	1/04/16-11/04/16 1/07/16-11/07/16 1/01/16-11/01/16 11/03/16-11/03/16	2 2	:30 1 :30 1 :30 1 :30 1 :30 1 :30 1 :30 2	11:40P- AB 11P- ABC-JI 12A- ABC-N 12A- ABC-N 12A- ABC-N 12A- ABC-N 12A- Sports Football 2:30P- Spo	IC-Jimmy Kimmel immy Kimmel Nightline Nightline					1		1	\$90 \$90 \$45 \$45	0.00 5.00 5.00 0.00	\$90.00 \$90.00 \$45.00 \$45.00 \$900.00	Mobile (W Mobile (W Mobile (W	iear) Iear) Iear) Iear) Iear)	J KIMMELI-ABC J KIMMELI-ABC ABC-NITELINE ABC-NITELINE	10/21/3 10/5/10 10/5/10 10/5/10
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		CONFIRMATION C		Company and the	
pted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:	

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4. 4.

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")

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B/E Bookend P/B Piggy Back Printed At: 05:47 PM on Thursday, November 3 2016 Page 12 of 12



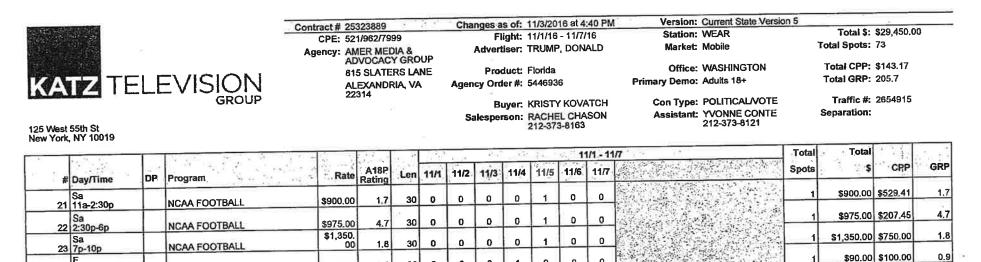


	ə	Contract # 25	323889	-	Merci.	Cha	nges a	s of: 1	1/3/20	16 at 4	:40 PM	Version: Current State Version	on 5			
當社會主体的		CPE: 52	1/962/79			11000	FI	ight: 1	1/1/16	- 11/7/	/16	Station: WEAR Market: Mobile		Total \$: Total Spots:	\$29,450.00 73	0
		Agency: AN	VOCAC	DIA & Y GRO	UP		Advert	iser. T	RUMP	, DON	ALD			•		
			5 SLATE				Pro	duct: F	Torida			Office: WASHINGTON		Total CPP:		
KATZ			EXAND	RIA, VA	۱.	Agen	cy Ord	ier#: 5	44693	6		Primary Demo: Adults 18+		Total GRP:	205.7	
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						Sa	alespe	son: F				Assistant: YVONNE CONTE 212-373-8121		Separation:		
125 West 55th St New York, NY 10019		Comments: Se	namtion	- 30				4	12-37.	3-8163		212 010 0101				
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# Day/Time	DP Program	Rate	A18P Rating	Len	11/1	11/2	11/3	11/4	11/5	11/6	11/7		Spots	1		
Tu-F,M				- 20	0	0.4	1	0	0	0	1	NOT THE WORLD SERVICE	3	\$225.00	\$53,57	4.2
1 5a-5:30a	3-MORN 5-530AM	\$75.00	1.4	30		+	-						3	\$375.00	\$65,79	5.7
Tu-F,M 2 5:30a-6a	3-MORN 530-6AM	\$125.00	1.9	30	1	1	0	0	0	0	1					
M-F 3 6a-7a	3-MORN 6-7AM	\$450.00	2.9	30	1	0	1	1	0	0	1		4	\$1,800.00	\$155.17	11.6
3 68-78 M-F				30	0	1	1	1	0	0	1		4	\$1,800.00	\$118.42	15.2
4 6a-7a	3-MORN 6-7AM	\$450.00	3.8	- 30		<u> `</u>				1			4	\$1,800.00	\$118,42	15.2
5 7a-9a	GD MRN AMR-ABC	\$450.00	3.8	30	1	1	1	0	0	0	1					12.4
M-F 6 7a-9a	GD MRN AMR-ABC	\$450.00	3.1	30	1	1	1	1	0	0	0		4	\$1,800.00	\$145.10	
Su	GD MRN-SUN-ABC	\$200.00	2.4	30	0	0	0	0	0	1	0		1	\$200.00	\$83.33	2.4
7 7a-8a Su		-				0	0	0	0	1	0		1	\$125,00	\$125.00	1.0
8 9a-9;30a	FULL MEASURE	\$125.00	1.0	30	10			1					5	\$950.00	\$90.48	10.5
9 4p-5p	CH3 NEWS-AT 4	\$190.00	2.1	30	1	1	1	1	0	0	1					12.0
M-F 10 4p-5p	CH3 NEWS-AT 4	\$190.00	2.4	30	1	1	1	1	0	0	1		5	\$950.00	\$79.17	
Tu-F,M	CHANNL 3 NWS@5	\$450.00	4.4	30	1	1	1	1	0	0	1		5	\$2,250.00	\$102.27	22.0
11 5p-5:30p Tu-F,M						1	1	1	0	0	1		5	\$3,750.00	\$147.06	25.5
12 6p-6:30p	CH3 NEWS AT 6	\$750.00	5.1	30	1	+	1-1-	1	1	-			2	\$500.00	\$75.76	6.6
Sa 13 6p-7p	CH3 NWS-6 SA	\$250.00	3.3	30	0	0	0	0	2	0	0					
Tu-F,M 14 6:30p-7p	MILLIONAIRE	\$825.00	3.9	30	1	1	1	1	0	0	0		4	\$3,300.00	\$211.54	15.6
Tu-F,M	1000 000000	\$750.0	3.4	30	1 1	1	1	1	0	0	1		5	\$3,750.00	\$220.59	17.0
15 10p-10:35p Tu-F.M	CH3 NEWS AT 10<										1	Te for a state of the	6	\$1,125.00	\$107.14	10.5
16 10:35p-11p	CH3 NEWS EXTRA	\$225.0	2.1	30	1	11	1	+1	0	0			1		\$133.33	1.5
17 10:30p-11p	SA LATE NEWS AFTER	FB \$200.0	0 1.5	5 30	0	0	0	0	1	0	0					
Su 18 10p-10:35p	CH3 NWS-10SU<	\$500.0	0 3.4	4 30	0	0	0	0	0	1	0		1	\$500.00	\$147.06	3.4
Tu-F,M					1	1	0	0	0	0	1		<u> </u>	\$270.00	\$100.00	2.7
19 11p-12m	J KIMMELI-ABC	\$90.0				-	1	1	-					\$90.0	\$56.25	1.6
Tu-F,M 20 12m-12:30a	ABC-NITELINE	\$45.0	0 0.0	8 30	0 1	0	11	0	0	0	0	Automotive and the second second				

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Page 2 of 4

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\$300.00

73 \$29,450.00 \$143.17

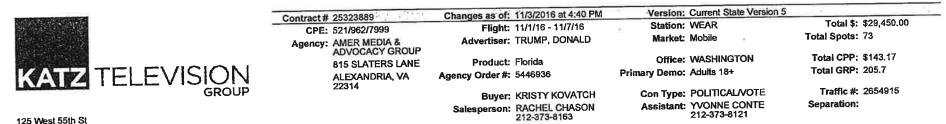
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125 West 55th St New York, NY 10019

Special Instructions		
		Order Level Comments
Date/Time	Added by	Comment
		LN 14 NA 1X 11/7 PER DEB FOR \$825
11/03/16 3:49 PM	Grace Connors	OFR: ADD 1X TO LN 3 1X M 11/7 @ \$450 OFR: SA 1206-106A RING OF HONOR 1X 11/5 @ \$75 OFR: SU 7-8A GMA SUN 1X 11/6 @ \$300
110010 0.45 1 1		TAKING FROM 25323888 LN 13 LN 13 ADD 1X TO 11/5 AND CHANGE TP TO 6-7P
11/01/16 2:04 PM	Grace Connors	THANKSI
	RACHEL CHASON	Separation: 30
10/21/16 10:59 AM	Grace Connors	LN 19 TP CHANGE FOR KIMMEL TO 1140P-1242A ON F 11/4 ONLY.
10/05/16 2:04 PM	System	Notice Received.
10/03/16 4:51 PM	RACHEL CHASON	Separation: 30

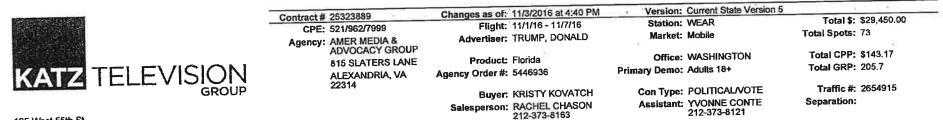
Competitive Information								
Market Budget:	\$65,444							
WEAR Share:	45%							
Comment:								
WALA:								
WKRG:	31%							
WPMI:	11%							

1.11 S	A Stream or and	Daypar	Monthly Summary						
17 Stat	of Distal		Dollars	CPP	10	GRP	Month	Spots	Dollars
Day/Time	% Distrib					Contraction of the	2016-Nov	73	\$29,450.00
	100%	73	\$29,450.00			205.7			
Total	100%		\$29,450.00	\$143.17	1.27	205.7	Total	- 73	\$29,450.0

Trans	Created/Received	Created by	Status	Spot+	Spot-	11 \$1	Chg	Contract \$	Comment
		YVONNE CONTE	Confirmed	2			\$0	920 450 00	Changes: Total Spots from 71 to 73, Total GRPs from 206.7 to 205.7, Total CPP from \$142.48 to \$143.17. 4 buylines added or modified.
Revision			Confirmed				\$0	\$29,450.00	Changes: Total GIMPs from 203 to 207, Total CPM from \$143,559.49 to \$142,477.02
Makegood 3	11/3/16 3:49 PM	RACHEL CHASON	Confirmed	1		\$25	0.00	\$29,450.00	Changes: Total Spots from 70 to 71, Calculated Dollars from \$29,200.00 to \$29,450.0 Changes: Total Spots from 70 to 71, Calculated Dollars from \$29,200.00 to \$29,450.00 Total GRPs from 203.4 to 206.7, Total CPP from \$143.56 to \$142.48, Competitive Market Budget from \$64,889 to \$65,444, User Entered \$ from \$29,200.00 to \$29,450.00, Total \$ from \$29,200.00 to \$29,450.00. 1 buyline added or modified.
	11/1/16 2:04 PM		Confirmed				\$0	\$29,200.00	
Makegood 2 Revision		RACHEL CHASON	Confirmed				\$0	\$29,200.00	Changes: 6 buylines added or modified.

Printed on 11/03/2016 at 05:42 PM

Page 3 of 4



125 West 55th St New York, NY 10019

		O	Status	Spot+	Spot-	\$ Chg	· Contract \$	Comment
rans	Created/Received	Created by	Julius					Changes: Buyer from MediaAssistant, AMAG to KRISTY KOVATCH, User Entered
		DAGUEL OUASON	Confirmed	1 1		\$0	CO 000 00	Changes: Buyer from Wedlarsstatant, Anno 6 Market Budget from \$62,433 to \$64,889. 2 from \$0.00 to \$29,200.00, Competitive Market Budget from \$62,433 to \$64,889. 2 buylines added or modified.
evision		RACHEL CHASON				\$0	\$29 200 00	Changes: Total GIMPs from 0 to 203, Total CPM from \$0.00 to \$143,559.49.
akegood 1	10/21/16 10:59 AM	Grace Connors	Confirmed	-			420,200.00	() () () () () () () () () ()
lectronic	10/3/16 5:02 PM					\$0	\$0	
ontracting		RACHEL CHASON	Confirmed	70		\$29,200.00	\$29,200.00	

Non-Discrimination Policy

PARAGRAPHS 49 AND 50 OF THE UNITED STATES FEDERAL COMMUNICATIONS COMMISSION SHOW STONDARD MUST CONTAIN NONDISCRIMINATION CLAUSES. CONSISTENT WITH THIS ORD ADVERTISING CONTRACTS WILL NOT DISCRIMINATE ON THE BASIS OF RACE OR ETHNICITY, AND MUST CONTAIN NONDISCRIMINATION CLAUSES. CONSISTENT WITH THIS ORD 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.

Printed on 11/03/2016 at 05:42 PM

Page 4 of 4

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EXHIBIT U

Sales Order

Station: WRMD-TV		Agency: AMERICAN MEDIA & ADVOCACY GROUP
Contract Name: TRUMP 1469070 est8596		Address: 815 Slaters Lane
Contract#:		City: Alexandria State: VAZip: 22314
Start Date: 11/04/16 End Date:	11/08/16	Buyer:
Revenue Type: POLITICAL SALES	10000	Tax Schedule: (None)
NATIONAL	Type: Cash	Agency Commission %: 15
Advertiser: TRUMP FOR PRESIDENT	90016	Billing Cycle: Standard
Address:		Salesperson: 5323nnat Comm %: 0
City:Zip:		Makegood Policy: Within Contract Dates
Product Name: 1015 HISP 1469070 est8596		
Estimate #: 8596	ilden eiseren er erresses	
Competitive Code: POLITICAL		

No	DA	TES	Alt	TIA	/IES	ES LEN				DI	STRI	BUT	ION				тс	TOTALS	
140	START	END	wks	START	END	LEN	М	Т	W	Т	F	SA	SU	Per Wk	D/W	RATE	SPOTS	\$\$	PTY
1	11/07/16	11/07/16		7:00 AM	10:00 AM	30	1							1	D	45.00	1	45.00	1
2	11/08/16	11/08/16		7:00 AM	10:00 AM	30		1						1	D	45.00	1	45.00	1
3	11/07/16	11/07/16		6:00 PM	6:30 PM	30	1							1	D	150.00	1	150.00	1
4	11/07/16	11/07/16		6:30 PM	7:00 PM	30	1							1	D	150.00	1	150.00	1
5	11/04/16	11/04/16		7:00 PM	8:00 PM	30					1			1	D	500.00	1	500.00	1
6	11/07/16	11/07/16		7:00 PM	8:00 PM	30	1							1	D	500.00	1	500.00	1
7	11/04/16	11/04/16		8:00 PM	9:00 PM	30					1			1	D	400.00	1	400.00	1
8	11/07/16	11/07/16		8:00 PM	9:00 PM	30	1							1	D	400.00	1	400.00	1
9	11/04/16	11/04/16		9:00 PM	10:00 PM	30					1			1	D	400.00	1	400.00	1
10	11/07/16	11/07/16		9:00 PM	10:00 PM	30	1						1	1	D	400.00	1	400.00	1
11	11/04/16	11/04/16		10:00 PM	11:00 PM	30					1			1	D	400.00	1	400.00	1
12	11/07/16	11/07/16		10:00 PM	11:00 PM	30	1							1	D	400.00	1	400.00	1
13	11/04/16	11/04/16		11:00 PM	11:30 PM	30					1			1	D	125.00	1	125.00	1
14	11/07/16	11/07/16		11:00 PM	11:30 PM	30	1							1	D	125.00	1	125.00	1
15	11/05/16	11/05/16		5:00 PM	5:30 PM	30						1		1	D	55.00	1	55.00	1
16	11/06/16	11/06/16		5:00 PM	5:30 PM	30							1	1	D	45.00	1	45.00	1
17	11/05/16	11/05/16		7:00 PM	9:00 PM	30						1		1	D	55.00	1	55.00	1
18	11/05/16	11/05/16		9:00 PM	11:00 PM	30						1		1	D	80.00	1	80.00	1
19	11/06/16	11/06/16		8:00 PM	10:00 PM	30					-		1	1	D	200.00	1	200.00	1
20	11/06/16	11/06/16		10:00 PM	11:00 PM	30							1	1	D	200.00	1	200.00	1

Billing Projections: By Month

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	Nov 16
CA	4,675.00

ST 4,675.00

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V Print Spot Prices	TOTAL SP	ots	20
EST.8596	GROSS TO	1997 - S.C.	4,675.00
	ADJUSTED	SPOTS	20
	ADJUSTED	D TOTAL \$_	4,675.00
	APPROVE	DECLINE	
	\bigcirc	\bigcirc	General Manager
	\bigcirc	\bigcirc	Regional Traffiic Manager
	\bigcirc	\bigcirc	National Sales Manager
	\bigcirc	\bigcirc	Local Sales Manager

ORDER WORKSHEET

Rep Order# 1469070 Ver# 1 EC'd No	Status Confirmed Traffic Order# 1469070 Last Received: Showing Buylines:	Printed: 11/04/16 11:34 AM 1 of 3 11/04/16 11:34 AM AII Lines AII Lines 1 of 3
Station WRMD-TV TAMPA Advertiser (TRUM) TRUMP FOR PRESIDENT Product 1015 - HISPANIC Estimate# 8596 Buyer KRISTY KOVATCH	Agency (AMAG) AMERICAN MEDIA & ADVOCACY GRO 815 SLATERS LANE ALEXANDRIA, VA 22314 Agency C/P1/P2/E 521/1015/8596 Flight Dates 11/04/16-11/08/16	UPRep Firm NBCUNIVERSAL Sales Office (WA) WASHINGTON Salesperson (HIL) WILL HILDEBRANDT Sales Assistant JAY Salesperson Phone# 2028854861 Salesperson Fax#

--- CONTRACT COMMENT ---

30 MIN SEP. ORDER ID# 5550453

Ln	Day	Time	Program	Len	RTG/IMP	GRPs/ (000)	Rate	Dates	Spots/ Week	Total Spots	Total Cost
1	м	7A-10A	NUEVO DIA	30	-	-	\$45.00	11/07-11/07	/ 1	1	\$45.00
2	Tu	7A-10A	NUEVO DIA	30			\$45.00	11/08-11/08	J 1	1	\$45.00
3	М	6P-630P	TELENOTICAS	30		*	\$150.00	11/07-11/07	3 і	1	\$150.00
4	м	630P-7P	NOTICIERO TELEMUNDO	30			\$150.00	11/07-11/07	ÿ 1	l	\$150.00
5	F	7P-8P	CC-ED	30			\$500.00	11/04-11/04	5 1	1	\$500.00
6	м	7 P-8 P	CC-ED	30	2	-	\$500.00	11/07-11/07	6 1	1	\$500.00
7	F	8P-9P	EVA	30		~	\$400.00	11/04-11/04	7 1	1	\$400.00
8	м	8P-9P	EVA	30			\$400.00	11/07-11/07	8 1	1	\$400.00
9	F	9P-10P	ESCLV	30	*		\$400.00	11/04-11/04	G 1	1	\$400.00
10	м	9P-10P	ESCLV	30	-	. 	\$400.00	11/07-11/07	1) I	1	\$400.00
11	F	10P-11P	SENR	30		-	\$400.00	11/04-11/04	// 1	1	\$400.00
12	м	10P-11P	SENR	30		-	\$400.00	11/07-11/07	12 1	1	\$400.00
13	F	11P-1130P	TELENOTICIAS	30	*		\$125.00	11/04-11/04	13 1	1	\$125.00
14	м	11P-1130P	TELENOTICIAS	30	25	2 2 3	\$125.00	11/07-11/07	14 1	l	\$125.00

ORDER WORKSHEET

	Drder# No	1469070 Ve	r# 1	Status	Confirmed	Traffic Or		Last Received: wing Buylines:	Printed: 11/04/1 All Line	6 11:34 AM	1:34 AM		2 of 3
Station Advert Produc Estima Buyer	tiser (TR ct 101 nte# 859	D-TV TAMPA UM) TRUMP FOR 5 - HISPANIC 6 STY KOVATCH	PRESIDENT		815 SLA	AMERICAN TERS LANE NDRIA, VA 2 521/101 11/04/16-1	22314 5/8596	DVOCACY GRO	Sales Of Salesper Sales As	fice (WA) WASH son (HIL) WILL sistant JAY son Phone# 202	HINGTON HILDEBRAND	т	
Ln	Day	Time	Program			Len	RTG/IMP	GRPs/ (000)	Rate	Dates	Spots/ Week	Total Spots	Total Cost
15	Sa	5P-530P	NOTICIERO FIN			30	-	-	\$55.00	11/05-11/05	15 1	1	\$55.00
16	Su	5P-530P	NOTICIERO FIN			30	1.5	N. 2 .	\$45.00	11/06-11/06	16 1	1	\$45.00
17	Sa	7P-9P	AVG. ALL WKS			30	¥	~	\$55.00	11/05-11/05	17 1	1	\$55.00
18	Sa	9P-11P	AVG. ALL WKS			30	18		\$80.00	11/05-11/05	18 1	1	\$80.00
19	Su	8P-10P	LA VOZ KIDS			30	×	22	\$200.00	11/06-11/06	19 1	1	\$200.00
20	Su	10P-11P	AVG. ALL WKS			30	() 5 ;	05.	\$200.00	11/06-11/06	20 1	l	\$200.00
		• •											

---REPORT TOTALS---

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Report Totals: 20 / \$4,675.00

---SALES MONTHLY TOTALS---

Nov2016: 20/ \$4,6	675.00											
Order Totals: 20 / \$4 COMPETITIVE	,675.00 Tot	al GRPS: 0.0										
Marke	et Totals	\$4,675.00	CGAL	.00%	OTHE	.00%	WAC	.00%	WBL	.00%	WRMD	100.00%
COMPETITIVE COMME	ENTS											
SHARES TO BE UPDATED												

Books [null] Demos RA35+P

--- CREDIT RISK ----

ORDER WORKSHEET

Rep Order# 1469070 Ver# 1 EC'd No	Status Confirmed	affic Order# 1469070 Last Received: Showing Buylines:	Printed: 11/04/16 11:34 AM 11/04/16 11:34 AM All Lines	3 of	3
Station WRMD-TV TAMPA Advertiser (TRUM) TRUMP FOR PRESIDENT Product 1015 - HISPANIC Estimate# 8596 Buyer KRISTY KOVATCH CASH IN ADVANCE	815 SLATI ALEXANI Agency C/P1/P2/E	ERICAN MEDIA & ADVOCACY GR(S LANE IA, VA 22314 521/1015/8596 /04/16-11/08/16	DUPRep Firm NBCUNIVERSAL Sales Office (WA) WASHINGTON Salesperson (HIL) WILL HILDEBRANDT Sales Assistant JAY Salesperson Phone# 2028854861 Salesperson Fax#		

New Order

Agency:	American Media & Advocacy Group	Station:	WRMD	Flight Start:	11/04/2016
Office:	Alexandria	Order Type:	Normal	Flight End:	11/08/2016
Client:	521 - Donald J. Trump for President, Inc.	Cancel Date:		Hiatus:	
Product:	1015 - Hispanic				
Piggyback Product:					
Estimate:	8596 - Spanish language Nov 4-8	Received in ePort:	11/3/2016 5:30:28 PM		
				Airtime Dollars:	\$4,675.00
				Interactive Dollars:	\$0.00
Primary Demo:	A18+	Local/National:	National	Non-Airtime Dollars:	\$0.00
Demo 2:		Rep Office:	Telemundo Group (WRMD)	Total Dollars:	\$4,675.00
Demo 3:		AE:	Will Hildebrandt	Total Spots:	20
GRP:	5.40	Phone:			
CPP:	\$865.74	OrderID:	5550453		
GIMP:	0	Status:	New		
CPM:	\$0.00			MarketShare:	
Comments:	Separation: 30				

Daily Airtime Lines

Line	Daypart	DPT				24.11							Total		A1	8+	
No	(Program)	Code	Rate	СЛ	Len	11/4	11/5	11/6	11/7	11/8			Spots	Rtg	CPP	Imp	СРМ
1	FMTuWTh 7A-10A NUEVO DIA-TEL	EM	\$45.00	С	30	0	0	0	1	1			2	0.10	\$450.00		
2	FMTuWTh 6P-6:30P TELNOTCS TAMPA	EN	\$150.00	С	30	0	0	0	1	0			1	0.20	\$750.00		
3	FMTuWTh 6:30P-7P NOTICIERO-TEL	EN	\$150.00	С	30	0	0	0	1	0			1	0.30	\$500.00		
4	FMTuWTh 7P-8P CC-ED ESTL-TEL<	PA	\$500.00	С	30	1	0	0	1	0			2	0.70	\$714.29		
5	FMTuWTh 8P-9P EVA-TRAILR-TEL<	РT	\$400.00	С	30	1	0	0	1	0			2	0.20	\$2,000.00		
6	FMTuWTh 9P-10P ESCLV BLNC-TEL<	PT	\$400.00	С	30	1	0	0	1	0			2	0.30	\$1,333.33		
7	FMTuWTh 10P-11P SENR-CIEL4-TEL<	PT	\$400.00	С	30	1	0	0	1	0			2	0.30	\$1,333.33		
8	FMTuWTh 11P- 11:30P TELNOTCS TAMPA	LN	\$125.00	С	30	1	0	0	1	0			2	0.10	\$1,250.00		
9	Sa 5P-5:30P NOT-FIN-SA-TEL	EN	\$55.00	С	30	0	1	0	0	0			1	0.20	\$275.00		
10	Su 5P-5:30P NOT-FIN-SU-TEL	EN	\$45.00	С	30	0	0	1	0	0			1	0.10	\$450.00		
11	Sa 7P-9P AVG. ALL WKS	PT	\$55.00	С	30	0	1	0	0	0			1	0.30	\$183.33		
12	Sa 9P-11P AVG. ALL WKS	PT	\$80.00	С	30	0	1	0	0	0		_	1	0.20	\$400.00		

New Order (Page 2)

Agen Clien	•		n Media & mald J. Tru			•	Statio Produ				WRMD 1015 - Hispanic	Order ID: Estimate:		555045 8596 - 3	3 Spanish lang	juage No	ov 4-8
Fligh	t Start:	11/04/20	16				Flight	End:			11/08/2016	Received in ePo	ort:	11/3/20	16 5:30:28 F	PM	
Line	Daypart	DPT				- 2,		1.74					Total		A18	3+	- 5 m)
No	(Program)	Code	Rate	СЛ	Len	11/4	11/5	11/6	11/7	11/8			Spots	Rtg	CPP	Imp	CPM
13	Su 8P-10P VOZ KD 4SU- TEL/AVG. ALL WKS	РТ	\$200.00	С	30	0	0	1	0	0			1	0.60	\$333.33		
	Su 10P-11P AVG. ALL WKS	PT	\$200.00	С	30	0	0	1	0	0			1	0.10	\$2,000.00		
				Total	Spots:	5	3	3	8	1							
				Tota	d GRP:	1.6	0.7	0.8	2.2	0.1							
		Cash\$ - \$	Spots: \$4,67	75.00 -	20 Tra	ade\$ - \$	Spots:	\$0.00 -	0 T	otal Co	st: \$4,675.00 Total GRP - CPP:	5.4 - \$865.74 Total GIMP	(000) - C	PM: 0 - \$	0.00		

American Media & Advocacy Group

815 Slaters Lane, Alexandria, VA 22314 Phone: 703-683-4877 Fax: 703-683-6692

TRAFFIC INSTRUCTIONS

Spanish- Language

TO: TRAFFIC MANAGER

FROM: Caroline Kowalski

DATE: November 3, 2016

RE: Donald J. Trump for President, Inc.

You will be receiving the following :30s spots via Extreme Reach entitled 'Jobs ES H' with isci DTTV1103H

EFFECTIVE Friday, November 4,2016, please run the following spots in the rotation stated below:

'Jobs ES H' DTTV1103H

100%

THESE INSTRUCTIONS ARE EFFECTIVE UNTIL FURTHER NOTICE

Please sign, scan, and email confirmation of receipt to c.kowalski@americanmediaag.com

_STATION

____MARKET

___INITALS

Please call 703-683-4877 with any questions or problems.





POLITICAL INQUIRY RECORD: FEDERAL, STATE & LOCAL CANDIDATE ADS ALL QUESTIONS MUST BE ANSWERED

Federal Candidate

State or Local Candidate

1. Requested by (Agency name, address, phone number & contact):

Agency NameAmerican Media and AdvocacyContactCaroline KowalskiPhone Number(P)703-683-4877Address815 Slaters Lane
Alexandria, VA 22314

2. On behalf of (Candidate name & authorized campaign committee name):

Donald Trump, Donald J. Trump for President, Inc.

3. Election (Office sought & date):

President of the United States, Florida Primary 3/15/16

4. Date of request:

11/3/16

5. Request received by:

Telemundo

6. Details:

Candidate rates requested

7. Name, Address & Phone Number of contact person for the candidate or candidate's authorized campaign committee:

Contact Name Timothy Jost Phone Number 646-736-1779 Address 725 Fifth Avenue New York, NY 10022





POLITICAL INQUIRY RECORD: FEDERAL, STATE & LOCAL CANDIDATE ADS ALL QUESTIONS MUST BE ANSWERED

8. Name of treasurer of authorized committee:

Timothy Jost

9. Date and nature of follow-ups, if any:

Rates sent as requested

- 10. Disposition:
 - O Accepted see contract details
 - O Rejected provide reason:

Additional Information:

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:

L American Media and Advocacy Group

being/on behalf of: Donald J. Trump for President, Inc.

a legally qualified candidate of the Republican Party

political party for the office of: President of the United States of America

in the General Election

election to be held on: Tuesday, November 8,2016

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
					12

Attach proposed schedule with charges (if available):

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

Donald J. Trump for President, Inc.

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: Tim Jost

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

10/4/16	In ten	el
Date	Signature	
To Be :	Signed By Station Representative	
Accepted	Accepted in Part	C Rejected
		3

Signature

Printed Name

Title

FEDERAL CANDIDATE CERTIFICATION

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

Donald J. Trump for President, Inc. 1.

(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.

I 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.

S. Thup & Mcondut IK signature of candidate or authorized committee JOHN FERRE printed name date

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
See Schedule	See Schedule	See Schedule	See Schedule	See Schedule	See Schedule
47.8					24

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
- 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.

EXHIBIT V



POLITICAL INQUIRY FORM WFOR/WBFS - Miami CANDIDATE

SPI	ECIAL () PRIMARY () GENERAL (XX)	OUT OF WINDOW ()
Win	ndow Dates: 9/9/16-11/08/16	Name of Requestor: American Media and Adv Group	Date of Request: 11/4/2016
1.	AGENCY NAME, ADDRESS & PHONE	American Media & Advocacy Group 815 Slaters Lane Alexandria, VA 22314-1219 703-683-4877	Agency Contact: Kristy Kovatch
2.	CANDIDATE'S AUTHORIZED COMMITTEE NAME, ADDRESS, PHONE & TREASURER	RNC/Donald J. Trump for President, Inc. 725 Fifth Avenue New York, NY 10022	Treasurer's Name: Tim Jost
3.	ORGANIZATION FURNISHING TAPES:	See Line 1	
4.	CANDIDATE'S NAME: Donald J. Trump		
	CANDIDATE SEEKING OFFICE OF: Pro	esident is is a FEDERAL office	
	POLITICAL PARTY (if applicable): Republ	ican	
5.	NATURE OF REQUEST: Request For CANDIDATE Card Requesting Political Rate Card All Day	parts, All Programs, All Levels Rates :30s	XX
6.	 DISPOSITION MADE OF REQUEST: a) Granted b) Avails Offered c) Rejected 		XX XX
7.	SUBSEQUENT DEVELOPMENTS/AMOU	NT OF CHARGES: SEE FILE	
8.	REBATES Order # Date An	nount	

CBS EMPLOYEE COMPLETING FORM

Sean Dorsey, CBS Television Stations, WFOR & WBFS

EXHIBIT W

MUR755300156

OCBS STATIONS
POLITICAL INQUIRY FORM
REQUEST FOR POLITICAL CANDIDATE RATECARD

Market/Station: KYW/WPSG - Philadelphia

Date of Request: 11/4/16

Request Received By: Maggie McWilliams

SPI	ECIAL (🗆) PRIMA	RY (🗆)	GENERAL (🛛)	OUT OF WIN	NDOW (🗆)
Wii	ndow Dates: 9/9/16-11/8/16			Name of Requ Caroline Kow	
1.	AGENCY NAME, ADDRESS & PHO	DNE AMERICAN MEI 815 Slaters Ln Alexandria, VA 2 703.683.4877	DIA AND ADVOCACY G 2314	ROUP Agency Conta Caroline Kow	
2.	CANDIDATE'S AUTHORIZED COMMITTEE NAME, ADDRESS, PHONE & TREASURER	REPUBLICAN N COMMITTEE/DO PRESIDENT INC 725 5 Av New York, NY 10 646.736.1779	ONALD J TRUMP FOR	Treasurer's N Timothy Jost	ame:
3.	ORGANIZATION FURNISHING TA	PES: See Line 1			
4.	CANDIDATE'S NAME: Donald J T CANDIDATE SEEKING OFFICE OF POLITICAL PARTY (if applicable): 1	 President, United States This is a FEDERAL off 			
5.	NATURE OF REQUEST: Request For CANDIDATE Card			X	
	All Dayparts, All Programs, All G	Classes of Time, All Length	5		
6.	 DISPOSITION MADE OF REQUEST a) Granted/Avails Offered b) Rejected (Provide Reason) 				
7.	SUBSEQUENT DEVELOPMENTS/A	MOUNT OF CHARGES:	SEE FILE		
8.	REBATES Order # Date	Amount			

CBS EMPLOYEE COMPLETING FORM

Zak Pflieger for Maggie McWilliams, CBS Television Stations, 11/4/16

EXHIBIT X

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:

L American Media and Advocacy Group

being/on behalf of: RNC/Trump for President

a legally qualified candidate of the Republican Party

political party for the office of: President of the United States of America

in the General Election

election to be held on: Tuesday, November 8th, 2016

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
			*		
			† <i>1</i> :		
(4)			ě		

Attach proposed schedule with charges (if available):

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

RNC/Trump for President

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: Tim Jost

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

	Josh Ferre	ep
Date	Signature	
То Ве	Signed By Station Representative	
Accepted	Accepted in Part	Rejected
Tarre Signature	<u>Tara Washburn</u> Printed Name	<u>NSM</u> Title

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:

RNC/Trump for President

(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.

Residi

sighature of candidate or authorized committee

printed name

date

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
See	See	See	See	See	See
Schedule	Schedule	Schedule	Schedule	Schedule	Schedule

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.