

**VENABLE** LLP600 MASSACHUSETTS AVE., NW WASHINGTON, DC 20001  
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January 22, 2021

Ronald M. Jacobs

T 202.344.8215  
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RMJacobs@venable.comJeff S. Jordan  
Assistant General Counsel  
Federal Election Commission  
1050 First Street NE  
Washington, DC 20463  
VIA EMAIL: [CELA@fec.gov](mailto:CELA@fec.gov)**Re: MUR 7786 – Response to Complaint**

Dear Mr. Jordan:

We are writing this letter on behalf of Friends of Matt Gaetz, the principal campaign committee for Congressman Matt Gaetz in Florida's 1st Congressional District, and Steven G. Martin, in his official capacity as Treasurer (collectively, the "Committee"), in response to the Complaint filed in the above-referenced matter by Cris Dosev (the "Complainant"), a two-time losing primary opponent of Congressman Gaetz in 2016 and 2018. The Complaint was clearly filed for publicity and political gain and stems from the Complainant's confusion with respect to the disclaimer requirements for a radio advertisement placed by the Committee in July of 2020. The asserted facts on their face do not support a reason to believe finding in this matter, and the Complaint should be immediately dismissed.

The Federal Election Commission (the "Commission") may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Federal Election Campaign Act (the "Act"). *See* 11 C.F.R. § 111.4(a), (d). Unwarranted legal conclusions from asserted facts or mere speculation will not be accepted as true. *See* MUR 4960, Commissioners Mason, Sandstrom, Smith and Thomas, Statement of Reasons (Dec. 21, 2001). Moreover, the Commission will dismiss a complaint when the allegations are refuted with sufficiently compelling evidence. *See id.*

The single page Complaint alleges that the Committee included an improper oral disclaimer in a radio advertisement it placed on WNRP-AM in Pensacola, FL on July 15, 2020. As support for this allegation, the Complainant cites the order form for the ad purchase contained in WNRP's FCC political file. Specifically, the Complaint states that the "WNRP order for the radio ad referenced lists the client as 'Matt Gaetz for Congress' which would make 'Matt Gaetz for Congress' the 'authorized committee of the legally qualified candidate.'" The Complaint then points to the fact that "the actual radio commercial says it was paid for by 'Friends of Matt Gaetz,' not 'Matt Gaetz for Congress,'" thereby, in Complainant's specious opinion, resulting in

January 22, 2021

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the Committee's radio ad containing an improper disclaimer in violation of the Act and the Commission's regulations.

As an initial matter, it should be noted that the disclaimers required on a candidate committee's public communications are not dictated by whatever name appears on a broadcast or cable station order form contained in its FCC political files. It is common for such forms to contain incorrect information because they are often completed by staffers at the stations and not by agents of the campaign committee.

That is precisely what happened in this case, as the order form attached to the Complaint incorrectly reflected "Matt Gaetz for Congress" as the Client, as opposed to the Committee's actual name, "Friends of Matt Gaetz." When the station realized its error, it filed a revised order form in its political file with the correct name of the Committee and a memorandum explaining its mistake.<sup>1</sup> Interestingly, the Complaint was filed on August 25, 2020, two weeks after WNRP had corrected the record, acknowledged its mistake, and uploaded a revised order form with the correct Committee name, "Friends of Matt Gaetz." The fact that Mr. Dosev filed his Complaint anyway, well after the public was on notice of the station's error, goes to show that his motivations were entirely political in nature.

It is also remarkable that the Complainant, a three-time losing federal candidate<sup>2</sup> who is undoubtedly familiar with the Act and the Commission's regulations, would actually argue with a straight face that it is the name reflected on an advertising order form, and not the name appearing on a Committee's Form 1 Statement of Organization, that must appear in that Committee's advertising disclaimers. If Mr. Dosev was somehow confused by the basic disclaimer requirements after six years of running for federal office, one would assume he might have consulted the Commission's guidance or Congressman Gaetz's Form 1 Statement of Organization, available on the Commission's website, to ensure his allegations had merit. Unfortunately, it appears he did not bother with such due diligence.

In reality, the disclaimers on a committee's public communications are governed by the Act and the Commission's regulations, not by what appears on advertising order forms. If a "communication, including any solicitation, is paid for and authorized by a candidate, an authorized committee of a candidate, or an agent of either of the foregoing, the disclaimer must clearly state that the communication has been paid for by the authorized political committee." 11 CFR § 110.11(b)(1). In this case, as the Complainant acknowledges, the radio ad in question

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<sup>1</sup> See Matt Gaetz July Revision orders, confirmations and memo WNRP, WNRP FCC Political File (uploaded Aug. 12, 2020), available at <https://publicfiles.fcc.gov/am-profile/wnrp/political-files/2020/federal/us-house/matt-gaetz-for-congress-district-1/78101377-e948-b333-ce68-51f2cde1473f/> (a copy is attached as Exhibit A).

<sup>2</sup> See Cris Dosev, Ballotpedia, available at [https://ballotpedia.org/Cris\\_Dosev](https://ballotpedia.org/Cris_Dosev).

January 22, 2021

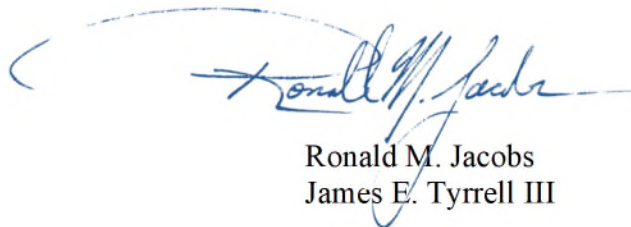
Page 3

correctly stated that it was "Paid for by Friends of Matt Gaetz," which is the name of Congressman Gaetz's authorized Committee.

In presenting politically-motivated and factually and legally unsubstantiated arguments, Mr. Dosev has failed to demonstrate that the Committee has violated any provision of the Act or the Commission's regulations. Instead, he has invoked an administrative process as a means to attack his former political opponent. We therefore respectfully request that the Commission recognize the legal and factual insufficiency of the Complaint on its face and immediately dismiss it.

Thank you for your prompt consideration of these matters, and please do not hesitate to contact me directly at (202) 344-8215 with any questions.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Ronald M. Jacobs", with a large, sweeping flourish above it.

Ronald M. Jacobs  
James E. Tyrrell III

*Counsel to Friends of Matt Gaetz and  
Steven G. Martin as Treasurer*

Enc.

# **Exhibit A**

ADX Communications of Escambia, LLC  
 WYCT/WNRP/ESPN  
 7251 PLANTATION RD  
 PENSACOLA, FL 32504  
 850-494-2800

FRIENDS OF MATT GAETZ

Advertiser ID: 2635 Amount Paid

2635-00003-0000	7/26/2020	1
<b>Official Invoice</b>	<b>Date</b>	<b>Page</b>

DETACH AND RETURN WITH PAYMENT

Katz Media Group  
 125 West 55th St 3rd Floor  
 New York, NY 10019

2635-00003-0000 O 7/26/2020 1

**For: FRIENDS OF MATT GAETZ**

Purchase Order Number: 34123503

Est. Number: 8261

Co-Op:

Description: 8261 6MGAE

Salesperson: Political, National Agency

*ELECTRONIC INVOICE*

Date	Day	Length		Qty	Rate	Total
<b>Copy: 7645 friends of matt gaetz</b>						
7/16/2020	Thu	:30	WNRP-AM 06:28:39 AM 07:29:06 AM 08:27:40 AM 01:30:00 PM 02:30:00 PM 03:29:59 PM 04:48:17 PM 06:57:03 PM	8	\$17.00	\$136.00
7/17/2020	Fri	:30	WNRP-AM 06:17:56 AM 07:19:02 AM 08:37:01 AM 10:34:06 AM 11:52:58 AM 03:18:00 PM 05:28:06 PM 06:48:09 PM	8	\$17.00	\$136.00
7/20/2020	Mon	:30	WNRP-AM 06:27:51 AM 07:49:55 AM 09:19:09 AM 10:17:23 AM 03:30:00 PM 04:47:07 PM 06:18:43 PM	7	\$17.00	\$119.00
7/21/2020	Tue	:30	WNRP-AM 07:18:27 AM 09:16:27 AM 10:33:53 AM 11:59:20 AM 03:30:00 PM 04:46:48 PM 06:48:57 PM	7	\$17.00	\$119.00
7/22/2020	Wed	:30	WNRP-AM 06:21:09 AM 07:36:34 AM 08:50:14 AM 11:23:33 AM 12:58:50 PM 04:26:33 PM 05:57:21 PM	7	\$17.00	\$119.00
7/26/2020			Agency Discount			(\$94.35)

WYCT/WNRP/WYCT-HD2/ESPN--Thank you for your business.

<b>Quantity</b>	37	<b>Total</b>	\$629.00
<b>AGENCY DISCOUNT</b>			(\$94.35)
<b>Total Due</b>			<b>\$534.65</b>

ADX Communications of Escambia, LLC  
 WYCT/WNRP/ESPN  
 7251 PLANTATION RD  
 PENSACOLA, FL 32504  
 850-494-2800

FRIENDS OF MATT GAETZ

Advertiser ID: 2635 Amount Paid

2635-00004-0000	7/26/2020	1
<b>Official Invoice</b>	<b>Date</b>	<b>Page</b>

DETACH AND RETURN WITH PAYMENT

Katz Media Group  
 125 West 55th St 3rd Floor  
 New York, NY 10019

2635-00004-0000 O 7/26/2020 1

For: **FRIENDS OF MATT GAETZ**

Purchase Order Number: 34123509

Est. Number: 8262

Co-Op:

Description: 8262 6MGAE

Salesperson: Political, National Agency

*ELECTRONIC INVOICE*

Date	Day	Length		Qty	Rate	Total
<b>Copy: 7645 friends of matt gaetz</b>						
7/23/2020	Thu	:30	WNRP-AM 06:50:01 AM 07:48:48 AM 08:46:42 AM 11:58:50 AM 12:59:19 PM 03:18:00 PM 05:18:51 PM 06:28:08 PM	8	\$17.00	\$136.00
7/24/2020	Fri	:30	WNRP-AM 06:19:06 AM 07:49:09 AM 08:51:03 AM 10:47:20 AM 12:25:30 PM 03:47:30 PM 05:28:06 PM 06:29:05 PM	8	\$17.00	\$136.00
7/26/2020			Agency Discount			(\$40.80)

WYCT/WNRP/WYCT-HD2/ESPN--Thank you for your business.

<b>Quantity</b>	16	<b>Total</b>	\$272.00
AGENCY DISCOUNT			(\$40.80)
<b>Total Due</b>			<b>\$231.20</b>

ADX Communications of Escambia, LLC  
 WYCT/WNRP/ESPN  
 7251 PLANTATION RD  
 PENSACOLA, FL 32504

Client: **FRIENDS OF MATT GAETZ**  
 Order #: **2635-00003**  
 Description: **8261 6MGAE**  
 Date Entered: **7/15/2020**  
 P.O.#: **34123503**  
 Salesperson: **Political, National Agency**  
 Invoice Frequency: **Billed at end of Media Month, Sorted by Date**

Katz Media Group  
 125 West 55th St 3rd Floor  
 New York, NY 10019

**On-Air Schedule**

Start Date	End Date	Station	Scheduled Time/Event	Repeated	Length	Qty	Rate	Total	M	Tu	W	Th	F	Sa	Su
1 7/16/2020	7/16/2020	WNRP-AM	06:00:00a to 10:00:00a	Weekly	:30	3	17.00	51.00	0	0	0	3	0	0	0
2 7/17/2020	7/17/2020	WNRP-AM	06:00:00a to 10:00:00a	Weekly	:30	3	17.00	51.00	0	0	0	0	3	0	0
3 7/20/2020	7/20/2020	WNRP-AM	06:00:00a to 10:00:00a	Weekly	:30	3	17.00	51.00	3	0	0	0	0	0	0
4 7/21/2020	7/21/2020	WNRP-AM	06:00:00a to 10:00:00a	Weekly	:30	2	17.00	34.00	0	2	0	0	0	0	0
5 7/22/2020	7/22/2020	WNRP-AM	06:00:00a to 10:00:00a	Weekly	:30	3	17.00	51.00	0	0	3	0	0	0	0
6 7/16/2020	7/16/2020	WNRP-AM	10:00:00a to 03:00:00p	Weekly	:30	2	17.00	34.00	0	0	0	2	0	0	0
7 7/17/2020	7/17/2020	WNRP-AM	10:00:00a to 03:00:00p	Weekly	:30	2	17.00	34.00	0	0	0	0	2	0	0
8 7/20/2020	7/20/2020	WNRP-AM	10:00:00a to 03:00:00p	Weekly	:30	1	17.00	17.00	1	0	0	0	0	0	0
9 7/21/2020	7/21/2020	WNRP-AM	10:00:00a to 03:00:00p	Weekly	:30	2	17.00	34.00	0	2	0	0	0	0	0
10 7/22/2020	7/22/2020	WNRP-AM	10:00:00a to 03:00:00p	Weekly	:30	2	17.00	34.00	0	0	2	0	0	0	0
11 7/16/2020	7/16/2020	WNRP-AM	03:00:00p to 07:00:00p	Weekly	:30	3	17.00	51.00	0	0	0	3	0	0	0
12 7/17/2020	7/17/2020	WNRP-AM	03:00:00p to 07:00:00p	Weekly	:30	3	17.00	51.00	0	0	0	0	3	0	0
13 7/20/2020	7/20/2020	WNRP-AM	03:00:00p to 07:00:00p	Weekly	:30	3	17.00	51.00	3	0	0	0	0	0	0
14 7/21/2020	7/21/2020	WNRP-AM	03:00:00p to 07:00:00p	Weekly	:30	3	17.00	51.00	0	3	0	0	0	0	0
15 7/22/2020	7/22/2020	WNRP-AM	03:00:00p to 07:00:00p	Weekly	:30	2	17.00	34.00	0	0	2	0	0	0	0

Order Start Date: 7/16/2020    Order End Date: 7/22/2020    Spots: 37    Total Charges: \$629.00  
 Combined Discounts: \$94.35  
 Total Net: \$534.65

This station does not discriminate in the sale of advertising time on the basis of race, gender, or ethnicity.

Contract is subject to termination by either party upon fourteen (14) days prior written notice. This offer becomes a binding contract upon acceptance by GM of Station or his/her authorized agent. Invoices shall be rendered monthly and shall be due and payable within thirty (30) days from the date of the invoice. 1.5% interest per month will be charged on delinquent accounts. Station shall have the right to cancel this contract upon default by advertiser in the payment of invoices or other material breach. Upon any cancellation, all broadcasting done hereunder, and not paid shall become immediately due and payable at the earned rate. Advertiser shall pay all attorney fees in the event that legal action is initiated to enforce this contract. Political and entertainment advertising requires cash or credit card payment in advance. Advertiser shall hold Station and its agents, employees and officers, harmless against liability for libel, slander, illegal competition or trade practice, infringement of trademarks, trade names or program titles, violation of rights of privacy and infringement of copyrights or proprietary rights resulting from the broadcast of its advertising herein provided in the form furnished by advertiser. Advertiser warrants that all advertising information submitted to Station truly represents the product or services advertised and will be free from false claims or assertions.

**Projected Media Month Billing Totals for FRIENDS OF MATT GAETZ / 2635-00003 :**

Month	Year	Spot Count	Gross Billing	Combined Disc.	Net Billing
July	2020	37	\$629.00	\$94.35	\$534.65

Confirmed & Accepted for ADX Communications of Escambia, LLC By:

Accepted for Katz Media Group By:

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Please Sign and Return One Copy



ADX Communications of Escambia, LLC  
 WYCT/WNRP/ESPN  
 7251 PLANTATION RD  
 PENSACOLA, FL 32504

Client: **FRIENDS OF MATT GAETZ**  
 Order #: **2635-00004**  
 Description: **8262 6MGAE**  
 Date Entered: **7/15/2020**  
 P.O.#: **34123509**  
 Salesperson: **Political, National Agency**  
 Invoice Frequency: **Billed at end of Media Month, Sorted by Date**

Katz Media Group  
 125 West 55th St 3rd Floor  
 New York, NY 10019

**On-Air Schedule**

Start Date	End Date	Station	Scheduled Time/Event	Repeated	Length	Qty	Rate	Total	M	Tu	W	Th	F	Sa	Su
1 7/23/2020	7/23/2020	WNRP-AM	06:00:00a to 10:00:00a	Weekly	:30	3	17.00	51.00	0	0	0	3	0	0	0
2 7/24/2020	7/24/2020	WNRP-AM	06:00:00a to 10:00:00a	Weekly	:30	3	17.00	51.00	0	0	0	0	3	0	0
3 7/27/2020	7/27/2020	WNRP-AM	06:00:00a to 10:00:00a	Weekly	:30	3	17.00	51.00	3	0	0	0	0	0	0
4 7/28/2020	7/28/2020	WNRP-AM	06:00:00a to 10:00:00a	Weekly	:30	2	17.00	34.00	0	2	0	0	0	0	0
5 7/29/2020	7/29/2020	WNRP-AM	06:00:00a to 10:00:00a	Weekly	:30	3	17.00	51.00	0	0	3	0	0	0	0
6 7/23/2020	7/23/2020	WNRP-AM	10:00:00a to 03:00:00p	Weekly	:30	2	17.00	34.00	0	0	0	2	0	0	0
7 7/24/2020	7/24/2020	WNRP-AM	10:00:00a to 03:00:00p	Weekly	:30	2	17.00	34.00	0	0	0	0	2	0	0
8 7/27/2020	7/27/2020	WNRP-AM	10:00:00a to 03:00:00p	Weekly	:30	1	17.00	17.00	1	0	0	0	0	0	0
9 7/28/2020	7/28/2020	WNRP-AM	10:00:00a to 03:00:00p	Weekly	:30	2	17.00	34.00	0	2	0	0	0	0	0
10 7/29/2020	7/29/2020	WNRP-AM	10:00:00a to 03:00:00p	Weekly	:30	2	17.00	34.00	0	0	2	0	0	0	0
11 7/23/2020	7/23/2020	WNRP-AM	03:00:00p to 07:00:00p	Weekly	:30	3	17.00	51.00	0	0	0	3	0	0	0
12 7/24/2020	7/24/2020	WNRP-AM	03:00:00p to 07:00:00p	Weekly	:30	3	17.00	51.00	0	0	0	0	3	0	0
13 7/27/2020	7/27/2020	WNRP-AM	03:00:00p to 07:00:00p	Weekly	:30	3	17.00	51.00	3	0	0	0	0	0	0
14 7/28/2020	7/28/2020	WNRP-AM	03:00:00p to 07:00:00p	Weekly	:30	3	17.00	51.00	0	3	0	0	0	0	0
15 7/29/2020	7/29/2020	WNRP-AM	03:00:00p to 07:00:00p	Weekly	:30	2	17.00	34.00	0	0	2	0	0	0	0

Order Start Date: 7/23/2020    Order End Date: 7/29/2020    Spots: 37    Total Charges: \$629.00  
 Combined Discounts: \$94.35  
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**Projected Media Month Billing Totals for FRIENDS OF MATT GAETZ / 2635-00004 :**

		<u>Spot Count</u>	<u>Gross Billing</u>	<u>Combined Disc.</u>	<u>Net Billing</u>
July	2020	16	\$272.00	\$40.80	\$231.20
August	2020	21	\$357.00	\$53.55	\$303.45

Confirmed & Accepted for ADX Communications of Escambia, LLC By:

Accepted for Katz Media Group By:

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Please Sign and Return One Copy

<b>REVISED</b>
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<b>Aug 12, 20</b>		
CONT#	34123503 Mod# 2 Ver# 5 (Last = MOD 1 CF)	DDS CONT# 0
REP	EASTMAN	C/P/E: na / na / 8261
TO	WNRP-AM (Pensacola, FL)	
FM	LINDSAY COOPER	
OFF	PHILADELPHIA	SALESPERSON FAX#
AGY	Katz Media Group	
ADDR	125 West 55th Street 3rd Floor New York, NY 10019	PH # 410-825-9877
BYR	Helen Hanratty	
ADV	FRIENDS OF MATT GAETZ	
PDT	6MGAE	
FLT	Jul 16, 20 - Jul 22, 20	

## \* REP ORDER COMMENT \*

\*\* 8/12/2020 10:31:00 AM: PLEAS CONFIRM. ADV NAME CHANGE.

\*\* 8/12/2020 10:31:00 AM: THIS IS A KATZ MEDIA GROUP ORDER. ALL BILLING SHOULD BE SENT TO KATZ MEDIA GROUP 125 W 55TH ST./NY,NY 10019. KATZ MEDIA GROUP IS NOT LIABLE FOR PAYMENT.

MC	LN	DAYS	TIME	LEN	EFFECTIVE DATES	# OF Day	NPD	RATE	TOT SPTS
		<b>FLIGHT 1</b>							
	1.1	...T...	6A - 10A	30	07/16/2020 - 07/16/2020	1D	3	\$17.00	3
	1.2	...T...	10A - 3P	30	07/16/2020 - 07/16/2020	1D	2	\$17.00	2
	1.3	...T...	3P - 7P	30	07/16/2020 - 07/16/2020	1D	3	\$17.00	3
					** FLIGHT TOTALS **		8	\$136.00	
		<b>FLIGHT 2</b>							
	2.1	...F..	6A - 10A	30	07/17/2020 - 07/17/2020	1D	3	\$17.00	3
	2.2	...F..	10A - 3P	30	07/17/2020 - 07/17/2020	1D	2	\$17.00	2
	2.3	...F..	3P - 7P	30	07/17/2020 - 07/17/2020	1D	3	\$17.00	3
					** FLIGHT TOTALS **		8	\$136.00	
		<b>FLIGHT 3</b>							
	3.1	M.....	6A - 10A	30	07/20/2020 - 07/20/2020	1D	3	\$17.00	3
	3.2	M.....	10A - 3P	30	07/20/2020 - 07/20/2020	1D	1	\$17.00	1
	3.3	M.....	3P - 7P	30	07/20/2020 - 07/20/2020	1D	3	\$17.00	3
					** FLIGHT TOTALS **		7	\$119.00	
		<b>FLIGHT 4</b>							
	4.1	.T.....	6A - 10A	30	07/21/2020 - 07/21/2020	1D	2	\$17.00	2
	4.2	.T.....	10A - 3P	30	07/21/2020 - 07/21/2020	1D	2	\$17.00	2
	4.3	.T.....	3P - 7P	30	07/21/2020 - 07/21/2020	1D	3	\$17.00	3
					** FLIGHT TOTALS **		7	\$119.00	

Aug 12, 20  
 CONT# 34123503 Mod# 2 Ver# 5 (Last = MOD 1 CF )  
 REP EASTMAN

DDS CONT# 0  
 C/P/E: na / na / 8261

FLIGHT 5									
5.1	..W....	6A - 10A	30	07/22/2020 - 07/22/2020	1D	3	\$17.00	3	
5.2	..W....	10A - 3P	30	07/22/2020 - 07/22/2020	1D	2	\$17.00	2	
5.3	..W....	3P - 7P	30	07/22/2020 - 07/22/2020	1D	2	\$17.00	2	
** FLIGHT TOTALS **						7	\$119.00		

	Jul 20						
SPOTS	37						
CASH	629.00						
TRADE	0.00						
NSL	0.00						
TOTAL	629.00						

	TOTAL						
SPOTS							37
CASH							629.00
TRADE							0.00
NSL							0.00
TOTAL							629.00

**\*\* Competitive Comments \*\***

FRIENDS OF MATT GAETZ RADIO 7.16-7.22 - 6MGAE

SVC:

Demo Adults 35+

Nondiscrimination -Paragraphs 49 and 50 of the United States Federal Communications Commission's Report and Order No. 07-217 provides that broadcast stations' advertising contracts will not discriminate on the basis of race or ethnicity, and must contain nondiscrimination clauses. Consistent with this order, Katz Communications, Inc. (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.

## REVISED

**Aug 12, 20**  
 CONT# 34123509 Mod# 2 Ver# 5 (Last = MOD 1 CF) DDS CONT# 0  
 REP EASTMAN C/P/E: na / na / 8262  
 TO WNRP-AM (Pensacola, FL)  
 FM LINDSAY COOPER  
 OFF PHILADELPHIA SALESPERSON FAX#  
 AGY Katz Media Group  
 ADDR 125 West 55th Street 3rd Floor PH # 410-825-9877  
 New York, NY 10019  
  
 BYR Helen Hanratty  
 ADV FRIENDS OF MATT GAETZ  
 PDT 6MGAE  
 FLT Jul 23, 20 - Jul 29, 20

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		<b>FLIGHT 1</b>							
	1.1	...T...	6A - 10A	30	07/23/2020 - 07/23/2020	1D	3	\$17.00	3
	1.2	...T...	10A - 3P	30	07/23/2020 - 07/23/2020	1D	2	\$17.00	2
	1.3	...T...	3P - 7P	30	07/23/2020 - 07/23/2020	1D	3	\$17.00	3
					** FLIGHT TOTALS **		8	\$136.00	
		<b>FLIGHT 2</b>							
	2.1	....F..	6A - 10A	30	07/24/2020 - 07/24/2020	1D	3	\$17.00	3
	2.2	....F..	10A - 3P	30	07/24/2020 - 07/24/2020	1D	2	\$17.00	2
	2.3	....F..	3P - 7P	30	07/24/2020 - 07/24/2020	1D	3	\$17.00	3
					** FLIGHT TOTALS **		8	\$136.00	
		<b>FLIGHT 3</b>							
	3.1	M.....	6A - 10A	30	07/27/2020 - 07/27/2020	1D	3	\$17.00	3
	3.2	M.....	10A - 3P	30	07/27/2020 - 07/27/2020	1D	1	\$17.00	1
	3.3	M.....	3P - 7P	30	07/27/2020 - 07/27/2020	1D	3	\$17.00	3
					** FLIGHT TOTALS **		7	\$119.00	
		<b>FLIGHT 4</b>							
	4.1	.T.....	6A - 10A	30	07/28/2020 - 07/28/2020	1D	2	\$17.00	2
	4.2	.T.....	10A - 3P	30	07/28/2020 - 07/28/2020	1D	2	\$17.00	2
	4.3	.T.....	3P - 7P	30	07/28/2020 - 07/28/2020	1D	3	\$17.00	3
					** FLIGHT TOTALS **		7	\$119.00	

Aug 12, 20  
 CONT# 34123509 Mod# 2 Ver# 5 (Last = MOD 1 CF )  
 REP EASTMAN

DDS CONT# 0  
 C/P/E: na / na / 8262

FLIGHT 5									
5.1	..W....	6A - 10A	30	07/29/2020 - 07/29/2020	1D	3	\$17.00	3	
5.2	..W....	10A - 3P	30	07/29/2020 - 07/29/2020	1D	2	\$17.00	2	
5.3	..W....	3P - 7P	30	07/29/2020 - 07/29/2020	1D	2	\$17.00	2	
** FLIGHT TOTALS **						7	\$119.00		

	Jul 20	Aug 20					
SPOTS	16	21					
CASH	272.00	357.00					
TRADE	0.00	0.00					
NSL	0.00	0.00					
TOTAL	272.00	357.00					

							TOTAL
SPOTS							37
CASH							629.00
TRADE							0.00
NSL							0.00
TOTAL							629.00

**\*\* Competitive Comments \*\***

FRIENDS OF MATT GAETZ RADIO 7.23-7.29 - 6MGAE

SVC:

Demo Adults 35+

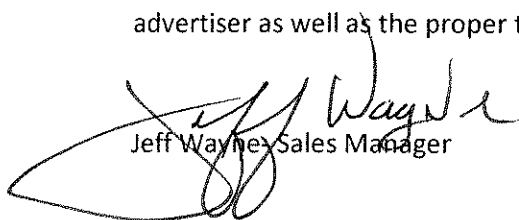
Nondiscrimination -Paragraphs 49 and 50 of the United States Federal Communications Commission's Report and Order No. 07-217 provides that broadcast stations' advertising contracts will not discriminate on the basis of race or ethnicity, and must contain nondiscrimination clauses. Consistent with this order, Katz Communications, Inc. (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.

## ADX Communication of Escambia, LLC

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8/11/2020

Due to an internal error from our KATZ representative, The Friends of Matt Gaetz orders were incorrectly coded. This was strictly an internal coding error. The proper paperwork was provided by the advertiser as well as the proper traffic ran in alignment with the order."



Jeff Wayne Sales Manager

ADX  
**DIGITAL**

NEWS RADIO  
92.3 | AM 1620

 **Cal 98.7**  
Country

**ESPN**  
PENSACOLA  
1330 AM | 99.1 FM

PENSACOLA'S  
**PLAYLIST**  
94.5