#### BEFORE THE FEDERAL ELECTION COMMISSION

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

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

v.

٨	Л	T	R	N	o.			
11	/ I U		•	1.7	<b>()</b> .			

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

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

## **COMPLAINT**

- 1. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that the National Rifle Association of America Political Victory Fund ("NRA-PVF") (ID:C00053553) and Josh Hawley for Senate (ID:C00652727) have violated the Federal Election Campaign Act ("FECA"), 52 U.S.C. § 30101, et seq.
- 2. The NRA-PVF and Josh Hawley for Senate appear to have engaged in an elaborate scheme designed to evade detection of violations of the Commission's common vendor coordination rules. OnMessage, Inc. ("OnMessage"), led by Josh Hawley for Senate's top campaign consultant, appears to have deliberately routed the NRA-PVF's independent expenditures

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

- 3. As a result, there is reason to believe that the NRA-PVF made illegal, unreported, and excessive in-kind contributions to Josh Hawley for Senate in the form of coordinated communications, 11 C.F.R. § 109.21, in violation of FECA's source prohibitions, reporting requirements, and contribution limits.
- 4. "If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [FECA] . . . [t]he Commission *shall* make an investigation of such alleged violation . . . ." 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).
- 5. Campaign Legal Center ("CLC") is a nonpartisan, nonprofit 501(c)(3) organization whose mission is to protect and strengthen the U.S. democratic process through litigation and other legal advocacy. CLC participates in judicial and administrative matters throughout the nation regarding campaign finance, voting rights, redistricting, and government ethics issues.

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

#### **FACTS**

- 7. The NRA-PVF is the National Rifle Association of America's lobbyist/registrant PAC.<sup>3</sup>
- 8. Josh Hawley is a candidate for U.S. Senate in Missouri. Josh Hawley for Senate is his authorized campaign committee.<sup>4</sup> Bradley "Brad" Todd—a partner at the consulting firms OnMessage and Starboard Strategic<sup>5</sup>—is Hawley's campaign consultant.<sup>6</sup>

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

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.

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

<sup>&</sup>lt;sup>4</sup> Josh Hawley for Senate, Statement of Organization, FEC Form 1, at 2 (amended Sept. 12, 2018), http://docquery.fec.gov/pdf/149/201809190200727149/201809190200727149.pdf.

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

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

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

# Facts Relevant to OnMessage and Starboard Strategic

- 10. OnMessage is a political consulting firm that has performed contracting work for dozens of campaigns and political committees. The *Washington Post* recently called OnMessage "a powerhouse GOP consulting firm."
- 11. OnMessage was registered in Virginia on April 13, 2005,<sup>9</sup> and was incorporated in Maryland on April 20, 2006.<sup>10</sup> Its website provides detailed information about its staff, past clients, and portfolio of work.<sup>11</sup>
- 12. In the 2010 election cycle, the NRA-PVF reported paying OnMessage over \$4.5 million, primarily for television and radio ad production, <sup>12</sup> including approximately \$3.2 million for federal independent expenditures, <sup>13</sup> according to reports filed with the Commission.

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

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

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

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

OnMessage, Inc.: General Information, Maryland Business Express, <a href="https://egov.maryland.gov/BusinessExpress/EntitySearch/BusinessInformation/F11249893">https://egov.maryland.gov/BusinessExpress/EntitySearch/BusinessInformation/F11249893</a> (last visited Oct. 19, 2018).

ONMESSAGE, INC., <a href="https://onmessageinc.com/">https://onmessageinc.com/</a> (last visited Oct. 19, 2018).

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

National Rifle Association of America Political Victory Fund, Independent Expenditures to OnMessage, Inc. (regularly scheduled reports), 2009-10, <a href="https://www.fec.gov/data/independent-expenditures/?data\_type=processed&committee\_id=C00053553&is\_notice=true&payee\_name=onmessage&max\_date=12%2F31%2F2010">https://www.fec.gov/data/independent-expenditures/?data\_type=processed&committee\_id=C00053553&is\_notice=true&payee\_name=onmessage&max\_date=12%2F31%2F2010</a>.

- 13. In the 2012 election cycle, the NRA-PVF reported paying OnMessage \$7.7 million for independent expenditures<sup>14</sup> and \$42,866 in other disbursements.<sup>15</sup> All of the independent expenditure payments were for "Advertising Expenses," and the other disbursements were also for television and radio advertising expenses.
- 14. Also in the 2012 election cycle, the NRA-ILA—a tax-exempt organization under Section 501(c)(4) of the Internal Revenue Code that describes itself as "the lobbying arm of the NRA," and which reports independent expenditures to the Commission under ID C90013301<sup>17</sup>—reported paying OnMessage over \$3.5 million for independent expenditures described as "Advertising Expenses." <sup>18</sup>
- 15. On March 22, 2013, Starboard was incorporated in Virginia by OnMessage officials.<sup>19</sup> The incorporation certificate lists five directors: Brad Todd, Curtis Anderson, Wesley Anderson, Graham Shafer, and Timothy Teepell.<sup>20</sup> At the time, three of those directors—Anderson,

Virginia State Corporation Commission, *supra* note 9.

National Rifle Association of America Political Victory Fund, Independent Expenditures to OnMessage, Inc. (regularly scheduled reports), 2011-12, <a href="https://www.fec.gov/data/independent-expenditures/?data">https://www.fec.gov/data/independent-expenditures/?data</a> type=processed&committee id=C00053553&cycle=2012&is notice=false&payee name=onmessage&min date=01%2F01%2F2011&max date=12%2F31%2F2012.

National Rifle Association of America Political Victory Fund, Disbursements to OnMessage, Inc., 2011-12, <a href="https://www.fec.gov/data/disbursements/?two">https://www.fec.gov/data/disbursements/?two</a> year transaction period=2012&data type=processed&committee id=C00053553&recipient name=onmessage&min date=01%2F01%2F2011&max date=12%2F31%2F2012.

NATIONAL RIFLE ASSOCIATION INSTITUTE FOR LEGISLATIVE ACTION, <a href="https://www.nraila.org/">https://www.nraila.org/</a> (last visited Oct. 19, 2018).

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

National Rifle Association Institute for Legislative Action, Independent Expenditures to On Message, Inc. (regularly scheduled reports), 2011-12, <a href="https://www.fec.gov/data/independent-expenditures/?data\_type=processed&committee\_id=C70000716&committee\_id=C90013301&cycle=2012&is\_notic\_e=true&payee\_name=message&min\_date=01%2F01%2F2011&max\_date=12%2F31%2F2012</a>. The address given for OnMessage, Inc. on the NRA-ILA's 2012 reports is 815 Slaters Lane in Alexandria, Virginia, which was the firm's address at that time. *See* archived version of OnMessage.com (April 5, 2012), <a href="https://web.archive.org/web/20120405025059/https://onmessageinc.com">https://web.archive.org/web/20120405025059/https://onmessageinc.com</a> (listing OnMessage's address at 815 Slaters Lane). This is also the address on OnMessage's corporate registration. *See OnMessage, Inc.*, Commonwealth of

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

Id.

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

- 16. According to a recent *POLITICO* article, "[i]nternal emails indicate executives toggled between roles" at both Starboard and OnMessage, and that "none of Starboard's partners has publicly affiliated himself with the company; four of them have LinkedIn pages, for instance, and their profiles only mention OnMessage."<sup>26</sup>
- 17. In the 2014 election cycle, the NRA-PVF and the NRA-ILA paid Starboard approximately \$20.5 million combined: the NRA-PVF paid Starboard \$12.54 million for independent expenditures, <sup>27</sup> and \$1.38 million in other disbursements, <sup>28</sup> and the NRA-ILA paid Starboard

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

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

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

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

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

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

National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. (regularly scheduled reports), 2013-14, <a href="https://www.fec.gov/data/independent-expenditures/?data">https://www.fec.gov/data/independent-expenditures/?data</a> type=processed&committee id=C00053553&is notice=false&payee name=starboard&min dat e=01%2F01%2F2013&max date=12%2F31%2F2014.

National Rifle Association of America Political Victory Fund, Disbursements to Starboard Strategic, Inc., 2013-14,

https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2014&data\_type=processed&committee\_id=C00053553&recipient\_name=starboard&min\_date=01%2F01%2F2013&max\_date=12%2F31%2F2014.

- \$6.6 million for independent expenditures.<sup>29</sup> Neither the NRA-PVF nor NRA-ILA reported any payments to OnMessage during the 2014 cycle.<sup>30</sup>
- 18. The NRA-PVF reported paying Starboard for expenses related to television, radio, and digital advertising in the 2014 cycle. The address reported for each Starboard disbursement was 705 Melvin Avenue #105 in Annapolis, Maryland,<sup>31</sup> the same address and suite number as OnMessage's Maryland office.<sup>32</sup>
- 19. The NRA-ILA also reported paying Starboard for "Advertising Expenses" in the 2014 cycle.
  The address reported for each Starboard disbursement was 817 Slaters Lane in Alexandria,
  Virginia,<sup>33</sup> the same address as OnMessage's Virginia office.<sup>34</sup>
- 20. The NRA's 2014 "focus" included "three major Senate races," and was aimed at "boosting Republican Senate challengers in Arkansas, Colorado and North Carolina," according to published reports.<sup>35</sup> Reports filed with the Commission show that the NRA-PVF supported candidates in these U.S. Senate races—Tom Cotton, Cory Gardner, and Thom Tillis—with

National Rifle Association Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. (regularly scheduled reports), 2013-14, <a href="https://www.fec.gov/data/independent-expenditures/?data\_type=processed&committee\_id=C70000716&committee\_id=C90013301&is\_notice=false&paye\_ename=starboard&min\_date=01%2F01%2F2013&max\_date=12%2F31%2F2014.</a>

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

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

ONMESSAGE, INC., <a href="https://onmessageinc.com/">https://onmessageinc.com/</a> (last visited Oct. 19, 2018).

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

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

Kevin Bohn, *NRA focuses on three major Senate races*, CNN (Sept. 17, 2014), <a href="https://www.cnn.com/2014/09/17/politics/nra-senate-races/index.html">https://www.cnn.com/2014/09/17/politics/nra-senate-races/index.html</a>.

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

- a) North Carolina U.S. Senate Candidate Thom Tillis:
  - i. The NRA-PVF paid \$2.3 million to Starboard for independent expenditures supporting Tillis or opposing his opponent,<sup>37</sup> and the NRA-ILA paid Starboard \$812,658 for Tillis independent expenditures.<sup>38</sup>
  - ii. Tillis's authorized campaign committee, the Thom Tillis Committee, reported paying OnMessage \$6.6 million during the same cycle for "advertising" and "media consulting."<sup>39</sup>
  - iii. The Thom Tillis Committee reported disbursements to OnMessage at the address 705 Melvin Ave. #105 in Annapolis, Maryland. 40 The NRA-PVF

8

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

National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. in support of Thom Tillis or opposing Kay Hagan (regularly scheduled reports), 2013-14, <a href="https://www.fec.gov/data/independent-">https://www.fec.gov/data/independent-</a>

 $<sup>\</sup>frac{expenditures/?data\ type=processed\&committee\ id=C00053553\&is\ notice=false\&payee\ name=starboard\&min\ dat}{e=01\%2F01\%2F2013\&max\ date=12\%2F31\%2F2014}.$ 

National Rifle Association of America Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. in support of Thom Tillis or opposing Kay Hagan (regularly scheduled reports), 2013-14, <a href="https://www.fec.gov/data/independent-">https://www.fec.gov/data/independent-</a>

expenditures/?data\_type=processed&committee\_id=C90013301&is\_notice=false&candidate\_id=S4NC00162&cand\_idate\_id=S8NC00239&payee\_name=starboard&min\_date=01%2F01%2F2013&max\_date=12%2F31%2F2014.

Thom Tillis Committee, Disbursements to OnMessage, Inc., 2013-14, <a href="https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2014&data\_type=processed&committee\_id=c00545772&recipient\_name=onmessage&min\_date=01%2F01%2F2013&max\_date=12%2F31%2F2014.">https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2014&data\_type=processed&committee\_id=c00545772&recipient\_name=onmessage&min\_date=01%2F01%2F2013&max\_date=12%2F31%2F2014.</a>

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

- also reported disbursements to Starboard at this address in its reports in the 2014 cycle, including for its independent expenditures supporting Tillis.<sup>41</sup>
- iv. OnMessage Founding Partner and Starboard Director Bradley Todd was described in news reports as a Tillis campaign "media strategist." 42
- b) Arkansas U.S. Senate Candidate Tom Cotton:
  - i. The NRA-PVF paid \$1.6 million to Starboard for independent expenditures supporting Cotton or opposing his opponent.<sup>43</sup> The NRA-ILA did not pay Starboard for any independent expenditures in this race.
  - ii. Cotton's authorized campaign committee, Cotton for Senate, reported paying OnMessage \$5.3 million during the same cycle for "Placed Media & Production," "Polling Consulting," and related services.
  - iii. Cotton for Senate reported disbursements to OnMessage at its Annapolis, Maryland address. <sup>45</sup> The NRA-PVF also reported disbursements to Starboard at this address on its reports in the 2014 cycle, including for its independent expenditures supporting Cotton. <sup>46</sup>

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

<u>expenditures/?data\_type=processed&committee\_id=C00053553&is\_notice=false&candidate\_id=S0AR00028&cand\_idate\_id=S4AR00103&payee\_name=starboard&min\_date=01%2F01%2F2013&max\_date=12%2F31%2F2014.</u>

9

See sources cited ¶18.

National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. in support of Tom Cotton or opposing Mark Pryor (regularly scheduled reports), 2013-14, <a href="https://www.fec.gov/data/independent-">https://www.fec.gov/data/independent-</a>

Cotton for Senate, Disbursements to OnMessage, Inc., 2013-14,

https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2014&data\_type=processed&committee\_id=C00499988&recipient\_name=onmessage&min\_date=01%2F01%2F2013&max\_date=12%2F31%2F2014.

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

See sources cited ¶18.

- iv. OnMessage's/Starboard's Todd was described in news reports as an "ad consultant" for Cotton's campaign. 47
- c) Colorado U.S. Senate Candidate Cory Gardner:
  - i. The NRA-PVF paid \$2.6 million to Starboard for independent expenditures supporting Gardner or opposing his opponent.<sup>48</sup> The NRA-ILA paid \$529,186 to Starboard for Gardner independent expenditures.<sup>49</sup>
  - ii. Gardner's authorized campaign committee, Cory Gardner for Senate, reported paying OnMessage \$8.0 million during the same cycle for "media production," "web services," and similar services.
  - iii. Cory Gardner for Senate reported disbursements to OnMessage at its Alexandria, Virginia offices.<sup>51</sup> The NRA-ILA also reported disbursements to Starboard at this address on its reports in the 2014 cycle, including for its independent expenditures supporting Gardner.<sup>52</sup>

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

National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. in support of Cory Gardner or opposing Mark Udall (regularly scheduled reports), 2013-14, <a href="https://www.fec.gov/data/independent-expenditures/2data/type-processed&committee\_id=C00053553&is\_notice-false&candidate\_id=S4C000395&is\_notice-false&candi

<sup>&</sup>lt;u>expenditures/?data\_type=processed&committee\_id=C00053553&is\_notice=false&candidate\_id=S4CO00395&candidate\_id=S8NM00184&payee\_name=starboard&min\_date=01%2F01%2F2013&max\_date=12%2F31%2F2014.</u>

National Rifle Association of America Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. in support of Cory Gardner or opposing Mark Udall (regularly scheduled reports), 2013-14, <a href="https://www.fec.gov/data/independent-">https://www.fec.gov/data/independent-</a>

expenditures/?data type=processed&committee id=C90013301&is notice=false&candidate id=S4CO00395&cand idate\_id=S8CO00172&payee\_name=starboard&min\_date=01%2F01%2F2013&max\_date=12%2F31%2F2014.

Cory Gardner for Senate, Disbursements to OnMessage, Inc., 2013-14, <a href="https://www.fec.gov/data/disbursements/?two">https://www.fec.gov/data/disbursements/?two</a> year transaction period=2016&data type=processed&committee id =C00492454&recipient\_name=onmessage&min\_date=01%2F01%2F2015&max\_date=12%2F31%2F2016.

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

<sup>52</sup> See sources cited ¶19.

- iv. OnMessage's/Starboard's Todd was described in news reports as a "consultant" for the Gardner campaign for OnMessage.<sup>53</sup>
- 21. In the 2016 cycle, the NRA-PVF and the NRA-ILA together paid Starboard a total of approximately \$40.7 million: the NRA-PVF paid Starboard \$17.0 million for independent expenditures<sup>54</sup> and \$305,483 in other disbursements,<sup>55</sup> and the NRA-ILA paid Starboard \$23.4 million for independent expenditures.<sup>56</sup> Together, the NRA-PVF and the NRA-ILA spent about \$52.6 million on independent expenditures for the 2016 federal election;<sup>57</sup> the payments to Starboard represented a majority of that spending.
- 22. The NRA-PVF reported paying Starboard for expenses related to television, radio, and digital advertising in the 2016 cycle. As was the case in the previous cycle, the address reported on each NRA-PVF disbursement to Starboard<sup>58</sup> was the same address and suite number as OnMessage's Maryland office.<sup>59</sup>

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

National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. (regularly scheduled reports), 2015-16, <a href="https://www.fec.gov/data/independent-expenditures/?data\_type=processed&committee\_id=C00053553&is\_notice=false&payee\_name=starboard&min\_date=01%2F01%2F2015&max\_date=12%2F31%2F2016.">https://www.fec.gov/data/independent-expenditures/?data\_type=processed&committee\_id=C00053553&is\_notice=false&payee\_name=starboard&min\_date=01%2F01%2F2015&max\_date=12%2F31%2F2016.</a>

National Rifle Association of America Political Victory Fund, Disbursements to Starboard Strategic, Inc., 2015-16,

https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2016&data\_type=processed&committee\_id =C00053553&recipient\_name=onmessage&recipient\_name=starboard&min\_date=01%2F01%2F2015&max\_date=12%2F31%2F2016.

National Rifle Association Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. (regularly scheduled reports), 2015-16, <a href="https://www.fec.gov/data/independent-expenditures/?data\_type=processed&committee\_id=C70000716&committee\_id=C90013301&is\_notice=false&paye\_e\_name=starboard&min\_date=01%2F01%2F2015&max\_date=12%2F31%2F2016.">https://www.fec.gov/data/independent-expenditures/?data\_type=processed&committee\_id=C70000716&committee\_id=C90013301&is\_notice=false&paye\_e\_name=starboard&min\_date=01%2F01%2F2015&max\_date=12%2F31%2F2016.</a>

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

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

ONMESSAGE, INC., <a href="https://onmessageinc.com/">https://onmessageinc.com/</a> (last visited June 15, 2018).

- 23. The NRA-ILA reported paying Starboard for "Advertising Expenses" in the 2016 cycle. As was the case in the previous cycle, the address reported on each NRA-ILA disbursement to Starboard<sup>60</sup> was the same address as OnMessage's Virginia office.<sup>61</sup>
- 24. The NRA-PVF and the NRA-ILA paid Starboard for independent expenditures supporting Wisconsin U.S. Senate candidate Ron Johnson, and Johnson's authorized campaign committee also contracted with OnMessage for media expenditures.
  - a) In the 2016 election cycle, the NRA-PVF paid \$315,066 to Starboard for independent expenditures supporting Johnson or opposing his opponent.<sup>62</sup> The NRA-ILA paid \$48,537 to Starboard for Johnson independent expenditures.<sup>63</sup>
  - b) Johnson's authorized campaign committee, Ron Johnson for Senate, Inc., reported paying OnMessage \$3.8 million during the same cycle for "placed media," "strategy consulting," and other services.<sup>64</sup>
  - c) Ron Johnson for Senate Inc. reported disbursements to OnMessage at its Annapolis, Maryland offices.<sup>65</sup> The NRA-PVF also reported disbursements to

National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. in support of Ron Johnson or opposing Russ Feingold (regularly scheduled reports), 2015-16, <a href="https://www.fec.gov/data/independent-">https://www.fec.gov/data/independent-</a>

expenditures/?data type=processed&committee id=C00053553&is notice=false&candidate id=S0WI00197&candidate id=S8WI00026&payee name=starboard&min date=01%2F01%2F2015&max date=12%2F31%2F2016.

expenditures/?data\_type=processed&committee\_id=C90013301&is\_notice=false&candidate\_id=S0WI00197&candidate\_id=S8WI00026&payee\_name=starboard&min\_date=01%2F01%2F2015&max\_date=12%2F31%2F2016.

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

ONMESSAGE, INC., <a href="https://onmessageinc.com/">https://onmessageinc.com/</a> (last visited June 15, 2018).

National Rifle Association of America Institute for Legislative Action, Independent Expenditures to Starboard Strategic, Inc. in support of Ron Johnson or opposing Russ Feingold (regularly scheduled reports), 2015-16, <a href="https://www.fec.gov/data/independent-">https://www.fec.gov/data/independent-</a>

Ron Johnson for Senate Inc., Disbursements to OnMessage Inc., 2015-16, <a href="https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2016&data\_type=processed&committee\_id=C00482984&recipient\_name=onmessage&min\_date=01%2F01%2F2015&max\_date=12%2F31%2F2016.</a>

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

- Starboard at this address on its reports in the 2016 cycle, including for its independent expenditures supporting Johnson.<sup>66</sup>
- d) Bradley Todd was a consultant for Johnson's campaign who worked on "media and polling" through August 2016.<sup>67</sup>
- 25. Neither the NRA-ILA nor NRA-PVF reported any disbursements to OnMessage in federal races for the 2016 election cycle.<sup>68</sup> However, despite this, OnMessage was nominated for, and won, industry awards for NRA-ILA and NRA-PVF ads that had been contracted through Starboard.
- 26. Specifically, on January 20, 2017, OnMessage Founding Partner Bradley Todd announced that OnMessage was a finalist for Reed Awards for two ads paid for by the NRA-ILA and NRA-PVF opposing presidential candidate Hillary Clinton titled "Nightstand" and "Jet." Todd declared that "OnMessage Inc was proud to partner with the NRA and produce their ads in this election." Both "Nightstand" and "Jet" are prominently featured on

See sources cited ¶22.

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

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

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

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

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

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

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

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

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

<sup>&</sup>lt;sup>74</sup> Id.

Guy Harrison, *OnMessage Wins Five Pollie Awards for TV and Digital Work*, OnMessage, Inc. (Mar. 20, 2017), <a href="https://onmessageinc.com/blog/03202017/">https://onmessageinc.com/blog/03202017/</a> (last visited July 16, 2018).

<sup>&</sup>lt;sup>76</sup> *Id*.

<sup>&</sup>lt;sup>77</sup> Id.

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

- 28. So far in the 2018 election cycle, the NRA-PVF has reported \$2.4 million in disbursements to Starboard.<sup>79</sup> This cycle, the NRA-PVF has also reported paying Starboard \$3.8 million for independent expenditures in the Alabama, Montana, and Georgia special elections, and in the Missouri, Indiana, Tennessee, and Montana U.S. Senate races.<sup>80</sup>
- 29. Starboard's website (starboardstrategicinc.com) currently includes a generic email address (info@starboardstrategicinc.com) and provides neither a list of staff nor a portfolio of work.<sup>81</sup> Several of the site's links are broken. According to *POLITICO*, OnMessage director Wesley Anderson registered Starboard's website, and the mailing address for the "admin contact" and the "tech contact" on Starboard's website registration begins "OnMessage Inc. ATTN STARBOARDSTRATEGIC.COM."<sup>82</sup>
- 30. There are many similarities in the language used on Starboard's and OnMessage's websites. For example, Starboard's "Creative" page reads, "In today's fragmented media age, advertisers must entertain or lose. Superior marketing carries the day and we strive to make our ads watchable and memorable. It's a tough battle, but we've got a team with the talent and the determination to win the fight." OnMessage's webpage describing its creative services reads "In today's fragmented media age, advertisers must entertain or

National Rifle Association of America Political Victory Fund, Disbursements to Starboard Strategic, Inc., 2017-18,

https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2018&data\_type=processed&committee\_id =C00053553&recipient\_name=onmessage&recipient\_name=starboard&min\_date=01%2F01%2F2017&max\_date=05%2F10%2F2018 (last visited Oct. 21, 2018).

National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. (24- and 48-hour reports), 2017-18, <a href="https://www.fec.gov/data/independent-expenditures/?data">https://www.fec.gov/data/independent-expenditures/?data</a> type=processed&committee id=C00053553&is notice=true&payee name=onmessage&payee name=starboard&min\_date=01%2F01%2F2017&max\_date=12%2F31%2F2018 (last visited Oct. 21, 2018).

STARBOARD STRATEGIC, INC., <a href="https://starboardstrategicinc.com/">https://starboardstrategicinc.com/</a> (last visited Sept. 13, 2018).

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

<sup>83</sup> *Creative*, STARBOARD STRATEGIC, INC., <a href="https://starboardstrategicinc.com/creative/">https://starboardstrategicinc.com/creative/</a> (last visited Sept. 13, 2018) (emphasis added).

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

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

Despite Starboard's impressive run in 2014, there appeared to be no attempt to market the new company to other prospective clients. In fact, according to FEC reports, other than a small sum it received from the National Republican Congressional Committee—business worth less than \$20,000—it has never had another federal election client besides the NRA. Moreover, none of Starboard's partners has publicly affiliated himself with the company; four of them have LinkedIn pages, for instance, and their profiles only mention OnMessage. One of them is Todd, who used the email address <a href="mailto:brad@starboardstrategicinc.com">brad@starboardstrategicinc.com</a> to offer the former OnMessage employee a job.

There is also no indication that Starboard has a distinct team of employees working within the offices of OnMessage. As with the partners, there are no staff members who publicly list themselves as working for Starboard, though a second email shows acknowledgment of double duty. Vicki Tomchik is OnMessage's longtime chief financial officer; the job is the only one she lists on her LinkedIn page. But in 2014, when the former OnMessage employee received an email from Tomchik, there were two references below her signature. One was OnMessage, and the other was Starboard. (Tomchik did not respond to a request for comment.)<sup>85</sup>

## 32. *POLTICO* also reported that:

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

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

Our Story, OnMessage, Inc., <a href="https://onmessageinc.com/our-story/">https://onmessageinc.com/our-story/</a> (last visited Sept. 13, 2018) (emphasis added).

Spies, *supra* note 5.

<sup>86</sup> *Id.* 

<sup>87</sup> *Id.* 

- employees reported seeing Todd around their office, and one employee noted "[t]here was consulting with [Todd] over high-end issues that were deemed controversial."88
- 34. On August 3, 2017, *McClatchy* reported that "OnMessage's Brad Todd, a consultant for Hawley's [2016] attorney general campaign, also will be Hawley's consultant for any Senate run." McClatchy also reported that "[n]inety percent of the \$8.7 million Hawley's state campaign committee spent before Election Day last year went to OnMessage Inc. for advertising and research." Todd has continued to speak on behalf of Josh Hawley for Congress throughout the general election campaign. 91
- 35. On September 25, 2018, the NRA tweeted that the NRA-PVF was endorsing Hawley in his senatorial bid. 92 The tweet also linked to a longer press release on the NRA-ILA's website announcing the endorsement and quoting NRA-PVF chairman Chris Cox, who said, "The NRA encourages all members, gun owners, and sportsmen in Missouri to vote Josh Hawley for U.S. Senate in November." 93
- 36. So far in the 2018 election cycle—specifically, on October 5, 2018 and October 19, 2018—the NRA-PVF has reported \$973,411 in payments to Starboard for independent expenditures either supporting Hawley or opposing Claire McCaskill. 94 The NRA-PVF reported paying

<sup>&</sup>lt;sup>88</sup> *Id.* 

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

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

NRA, @NRAPVF endorsed @HawleyMO for U.S. Senate in #Missouri, TWITTER (Sept. 25, 2018), <a href="https://twitter.com/NRA/status/1044700644442079232">https://twitter.com/NRA/status/1044700644442079232</a>.

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

National Rifle Association of America Political Victory Fund, Independent Expenditures to Starboard Strategic, Inc. in support of Josh Hawley or opposing Claire McCaskill (24- and 48-hour reports), 2017-18, <a href="https://www.fec.gov/data/independent-">https://www.fec.gov/data/independent-</a>

 $<sup>\</sup>underline{expenditures/?data\_type=processed\&committee\_id=C00053553\&is\_notice=true\&payee\_name=starboard\&min\_date}$ 

- Starboard at the address 705 Melvin Ave., #105, Annapolis, Maryland, 21401, 95 the same address and suite number as OnMessage's Maryland office. 96
- Also on October 5, 2018, the date of the NRA-PVF's first report of independent expenditures to Starboard in the 2018 Missouri U.S. Senate race, the NRA's lobbying arm, the NRA-ILA, issued a press release announcing the start of a seven-figure ad campaign in the Missouri U.S. Senate race by the NRA-PVF. The press release included a quote from Cox, who said, "If you value your constitutional right to self-defense, vote Josh Hawley for U.S. Senate," and a link to the ad itself. 99
- 38. As of September 30, 2018, the close of books for the 2018 October quarterly report, Josh Hawley for Senate had reported paying \$2.2 million to OnMessage for purposes including "media production," "web ads," "political strategy consulting/travel," and "survey research," at the address 705 Melvin Ave., #105, Annapolis, Maryland, 21401. 101

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

http://docquery.fec.gov/pdf/598/201810059124378598/201810059124378598.pdf.

See, e.g., National Rifle Association of America Political Victory Fund, 24/48 Hour Report of Independent Expenditures, FEC Schedule E, at 2-3 (filed Oct. 5, 2018),

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

Press Release, NRA-ILA, NRA Launches Seven-Figure Campaign in Missouri (Oct. 5, 2018), <a href="https://www.nraila.org/articles/20181005/nra-launches-seven-figure-campaign-in-missouri">https://www.nraila.org/articles/20181005/nra-launches-seven-figure-campaign-in-missouri</a>.

<sup>&</sup>lt;sup>98</sup> Id.

<sup>99</sup> See NRA, Josh Hawley will defend our rights. Always, YOUTUBE (Oct. 5, 2018),

https://www.youtube.com/watch?v=m2nC6ICopmk&feature=youtu.be.

See Josh Hawley for Senate, Disbursements to OnMessage, 2017-18, FEC.GOV, <a href="https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2018&data\_type=processed&committee\_id">https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2018&data\_type=processed&committee\_id</a>

<sup>=</sup>C00652727&recipient name=on+message&recipient name=onmessage&min date=01%2F01%2F2017&max dat e=10%2F05%2F2018 (last visited Oct. 9, 2018); Josh Hawley for Senate, 2018 October Quarterly Report, FEC Form 3, at 1308-1313 (filed Oct. 15, 2018),

http://docquery.fec.gov/pdf/990/201810159124925990/201810159124925990.pdf.

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

39. Additionally, as of September 30, 2018, Josh Hawley for Senate reported paying \$98,967 to an entity called "First Tuesday" for "Communications Consulting," "Communications Consulting/Travel," or "Travel," at the same address as OnMessage, 705 Melvin Ave., #105, Annapolis, Maryland, 21404. Maryland corporate records do not show any results for registered corporations under the name "First Tuesday," but Virginia State Corporation Commission records show that an entity called "First Tuesday: The Ballot Initiative Group" is located at 817 Slaters Lane, Alexandria Virginia, 404 the same address as OnMessage's Virginia office. Its articles of incorporation, dated August 2, 2016, listed the following individuals as directors: Bradley A Todd, Gail Gitcho, Wesley Anderson, Curtis Anderson, and Graham Shafer. State 2017 annual report, dated May 8, 2018, continued to list Todd, Gitcho, and Shafer, as directors, but replaced Wesley and Curtis Anderson with Orrin Harrison and Timothy Teepell. Todd, Shafer, Teepell, Harrison, and Wesley and Curtis Anderson all serve on Starboard's and OnMessage's boards, and First Tuesday's agent, Craig Palik, is also the registered agent for Starboard and OnMessage.

## Red Eagle Media, NMRPP and AMAG

See Josh Hawley for Senate, Disbursements to First Tuesday, 2017-18, FEC.gov, <a href="https://www.fec.gov/data/disbursements/?two">https://www.fec.gov/data/disbursements/?two</a> year transaction period=2018&data type=processed&committee id =C00652727&recipient name=first+tuesday&min date=01%2F01%2F2017&max date=10%2F05%2F2018 (last visited Oct. 9, 2018); Josh Hawley for Senate, 2018 October Quarterly Report, FEC Form 3, at 1300 (filed Oct. 15, 2018), <a href="https://docquery.fec.gov/pdf/990/201810159124925990/201810159124925990.pdf">https://docquery.fec.gov/pdf/990/201810159124925990/201810159124925990.pdf</a>.

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

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

Articles of Incorporation of First Tuesday: The Ballot Initiative Group, Inc., Commonwealth of Virginia State Corporation Commission (filed Aug. 2, 2016),

https://sccefile.scc.virginia.gov/Documents/1608026267.pdf?DocumentName=1608026267.

<sup>2017</sup> Annual Report; First Tuesday: The Ballot Initiative Group, Inc., Commonwealth of Virginia State Corporation Commission (filed May 8, 2018),

https://sccefile.scc.virginia.gov/08079485/AnnualReport/217549752.pdf.

<sup>&</sup>lt;sup>107</sup> See ¶15.

- 40. According to Federal Communications Commission ("FCC") records, the NRA-PVF placed its Missouri broadcast independent expenditures supporting Hawley using Red Eagle Media, located at 815 Slaters Avenue, Alexandria, Virginia, 22314. The FCC database does not appear to show the NRA-PVF placing 2018 broadcast advertisements in Missouri with any agency other than Red Eagle Media.
- 41. Red Eagle Media does not appear to have a website. Reports filed with the Commission do not show any record of the NRA-PVF or the NRA-ILA reporting disbursements to Red Eagle, either via regular disbursements or via independent expenditures. 109
- 42. According to Virginia Corporation Commission records, "Red Eagle Media" is a "fictitious name" or a "trade name" associated with the firm "National Media Research Planning and Placement, LLC," located at 815 Slaters Lane, Alexandria VA. 110 According to the Commonwealth of Virginia State Corporation Commission:

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

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

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, <a href="https://www.fec.gov/data/independent-expenditures/?data\_type=processed&is\_notice=true&payee\_name=red+eagle&min\_date=01%2F01%2F2017&max\_date=12%2F31%2F2018">https://www.fec.gov/data/independent-expenditures/?data\_type=processed&is\_notice=true&payee\_name=red+eagle&min\_date=01%2F01%2F2017&max\_date=12%2F31%2F2018</a> (last visited Oct. 10, 2018).

A business entity search for "Red Eagle Media" on the Virginia Corporation Commission website produces a list of results that includes "Red Eagle Media Group (Alexandria CI)," with an SCC ID number of S2070524, and a status of "fictitious name." Business Entity Search for "Red Eagle Media," Commonwealth of Virginia State Corporation Commission,

https://sccefile.scc.virginia.gov/Find/Business?SearchTerm=red+eagle+media&SearchPattern=K&as fid=71a314ab 0f8a83563c7a4633b7f34602942d6fb4 (last visited Oct. 9, 2018). Clicking on that search result leads to the page for National Media Research Planning and Placement, LLC, and the same SCC ID number, S2070524. *National Media Research Planning and Placement, LLC*, Commonwealth of Virginia State Corporation Commission, https://sccefile.scc.virginia.gov/Business/S207052 (last visited Oct. 9, 2018).

- often identified after a person's true name with the abbreviation "t/a" ("trading as"), "dba" ("doing business as"), or "aka" ("also known as"). 111
- 43. National Media Research, Planning & Placement (generally referred to as "National Media" describes itself as "a nationally recognized leader in media research, planning, and placement for issue advocacy, corporate, and political campaigns," and its website lists examples of its work, the names of and titles of approximately 20 employees, and a contact address of 817 Slaters Lane, Alexandria, VA, 22314. 113
- 44. FCC documents filed on behalf of the NRA-PVF by Red Eagle are signed by National Media employees. 114 For example:
  - a) An "agreement form" between Red Eagle and the Missouri station KYTV for NRA-PVF ads pertaining to the "Missouri General Election U.S. Senate," was signed on September 6, 2018 by Jon Ferrell, 115 who according to the National Media website is National Media's "Director of Accounting," 116 and who has been described in news reports as "National Media chief financial officer." 117

Frequently Asked Questions: Fictitious Names, Commonwealth of Virginia State Corporation Commission, <a href="http://www.scc.virginia.gov/clk/befaq/fict.aspx">http://www.scc.virginia.gov/clk/befaq/fict.aspx</a> (last visited Oct. 9, 2018).

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

NATIONAL MEDIA, <u>www.natmedia.com</u> (last visited Oct. 9, 2018).

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

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

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

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

- Ferrell's LinkedIn page describes his position as "CFO at National Media Inc.," and does not mention Red Eagle. 118
- b) A September 19, 2018 "political file disclosure form" filed by Red Eagle with the Missouri station KSHB, for NRA-PVF ads referencing Hawley and his opponent, lists Kristy Kovatch as the "contact person" for Red Eagle. 119 On National Media's website, Kristy M. Kovatch is listed as a "senior media buyer" who "specializes in television media buying for political candidates" and has been with the company for 20 years. 120 Kovatch's LinkedIn page lists her as "Senior Media Buyer at National Media, Research, Planning & Placement," and does not mention Red Eagle. 121
- 45. As of September 30, 2018, Josh Hawley for Senate had reported \$45,000 in payments to "National Media Digital" for "digital consulting" at the address 815 Slaters Lane, Alexandria, VA, 22314. National Media's website highlights its digital work as one of the services it offers. 124
- 46. Additionally, records filed with the Commission and FCC show that Josh Hawley for Senate has made disbursements to, or otherwise contracted with, a firm called "American Media &

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

Exhibit K at 1.

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

<sup>121</sup> Kristy (Moran) Kovatch, LinkedIn, <a href="https://www.linkedin.com/in/kristy-moran-kovatch-838ba3/">https://www.linkedin.com/in/kristy-moran-kovatch-838ba3/</a> (last visited Oct. 9, 2018).

Josh Hawley for Senate, Disbursements to National Media, FEC.gov, <a href="https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2018&data\_type=processed&committee\_id=C00652727&recipient\_name=national+media&min\_date=01%2F01%2F2017&max\_date=10%2F05%2F2018</a> (last visited Oct. 9, 2018). Josh Hawley for Senate did not report any additional payments to National Media on its October quarterly report.

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

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

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

- 47. FCC documents filed on behalf of Josh Hawley for Senate by AMAG are signed by National Media employees. For example:
  - a) An October 2018 contract shows AMAG placing \$50,175 in Josh Hawley for Senate ads with KMOV, and lists John Jay as AMAG's contact person. 128

    According to National Media's website, John Jay has been National Media's "Client Media Planner" since 2015. 129
  - An undated document uploaded to the FCC database on July 5, 2018 shows

    AMAG submitting an agreement form on behalf of Josh Hawley for Senate, and signed by "Jon Ferrell, agent for Josh Hawley for Senate." As noted supra ¶44,

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

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

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

American Media & Advocacy Group, LLC, Commonwealth of Virginia State Corporation Commission, <a href="https://sccefile.scc.virginia.gov/Business/S416256">https://sccefile.scc.virginia.gov/Business/S416256</a> (last visited Oct. 15, 2018).

Exhibit O at 1.

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

- Ferrell is National Media's "Director of Accounting," and his LinkedIn profile describes him only as "CFO at National Media Inc." and his LinkedIn profile
- c) Similarly, on an agreement form filed by AMAG dated September 6, 2018 for a "coordinated buy" on behalf of "Josh Hawley for Senate/NRSC," Ferrell signed the second page of the agreement form and the attached "federal candidate certification," where he signed as "Jon Ferrell, agent for Josh Hawley for Senate." Senate."

#### SUMMARY OF THE LAW

- 48. Federal law limits to \$2,700 the amount of a contribution that a senatorial candidate or her authorized campaign committee may accept from an individual donor. 52 U.S.C § 30116(a)(1). FECA also prohibits a corporation or labor union from making a contribution to a federal candidate. 52 U.S.C. § 30118(a).
- 49. Generally, contributions from a person to political committees other than candidate and party committees may not exceed, in the aggregate, \$5,000 per calendar year, 52 U.S.C. § 30116(a)(1)(C), and candidates cannot accept contributions from a non-multicandidate political committee in excess of \$2,700, *id.* § 30116(a)(1).
- 50. A "contribution" includes "any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office." 52 U.S.C. § 30101(8)(A)(i); see also 11 C.F.R. §§ 100.52(a), 114.1(a)(1). "Anything of value" includes all in-kind contributions. 11 C.F.R. § 100.52(d)(1). An in-kind contribution includes the provision without charge (or at less than the usual and normal

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

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

<sup>133</sup> Exhibit Q at 2-3.

- charge) of any goods or services, including, but not limited to, "facilities, equipment, supplies, personnel, advertising services, membership lists, and mailing lists." *Id*.
- 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).
- 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).<sup>134</sup>
- 53. In enacting the Bipartisan Campaign Reform Act, Congress mandated that the Commission promulgate "regulations on coordinated communications" to address, among other things, "payments for the use of a common vendor" and "payments for communications made by a person after substantial discussion about the communication with a candidate," and that such regulations "shall not require agreement or formal collaboration to establish coordination." Those "coordinated communications" regulations are at 11 C.F.R. § 109.21.
- 54. Under the regulations, a communication is coordinated with a candidate and/or that candidate's authorized committee, and is thus a contribution to that candidate's committee, when the communication (1) is paid for, in whole or in part, by a person other than the

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).

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

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

- 55. The second prong, the "content standard," is met if the communication "expressly advocates .

  . . the election or defeat of a clearly identified candidate for Federal office." *Id.* §

  109.21(c)(3).
- The "conduct" standard is satisfied if the political committee paying for the communication (a) uses a commercial vendor<sup>136</sup> to create, produce, or distribute the communication<sup>137</sup> that (b) during the previous 120 days also provided certain services to the candidate identified in the communication or a political party committee, <sup>138</sup> 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, <sup>139</sup> 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." <sup>140</sup> 11 C.F.R. § 109.21(d)(4). <sup>141</sup>

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*.

<sup>11</sup> C.F.R. § 109.21(d)(4)(i).

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*.

<sup>139</sup> *Id.* § 109.21(d)(4)(ii)(A-I).

<sup>140</sup> *Id.* § 109.21(d)(4)(iii).

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

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

## CAUSES OF ACTION

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

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

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

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

- I. The NRA-PVF Has Illegally Made Excessive and Unreported In-Kind Contributions to Josh Hawley for Senate
- 58. There is reason to believe that the NRA-PVF has made illegal, excessive, and unreported inkind contributions to Josh Hawley for Senate by financing at least \$973,411 in coordinated communications.
- A political committee makes a "coordinated communication" when the communication (1) is paid for, in whole or in part, by a person other than the candidate or committee; (2) satisfies at least one of the "content standards" in the regulation, for example by "expressly advocat[ing] . . . the election or defeat of a clearly identified candidate for Federal office"; and (3) satisfies at least one of the "conduct standards" in the regulation, such as the use of a "common vendor," 11 C.F.R. § 109.21(a).
- 60. The NRA-PVF's communications in support of Hawley, and in opposition to his opponent, satisfy the "payment" prong because they were paid for in whole by the NRA-PVF. *Id.* § 109.21(a)(1).
- 61. The communications satisfy the "content" prong because they are public communications that expressly advocated for the election of Hawley and the defeat of his opponent, Claire McCaskill. *Id.* § 109.21(c)(2).
- As described *infra* ¶¶63-74, the NRA-PVF's communications satisfy the "conduct" prong at 11 C.F.R. § 109.21(a)(3) and (d)(4) through the use of two related sets of common vendors: Starboard/OnMessage, which created and produced the communications, and National Media/AMAG, which distributed and placed them.

## Starboard/OnMessage

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

- 63. The NRA-PVF contracted with Starboard, a commercial vendor within the meaning of the regulation, <sup>146</sup> to create, produce, and/or distribute communications expressly advocating for Hawley or against his opponent. It reported payments to Starboard at the address 705 Melvin Avenue #105 in Annapolis, Maryland.
- 64. During the relevant time period, OnMessage provided several of the regulation's enumerated services to Hawley's principal campaign committee, Josh Hawley for Senate, which reported disbursements to OnMessage at its Maryland office, 705 Melvin Avenue #105 in Annapolis, Maryland.<sup>147</sup>
- onMessage, Inc. and Starboard Strategic, Inc. are functionally indistinguishable. The two entities are led by the same people<sup>148</sup>—including Bradley Todd, currently a consultant for Josh Hawley for Senate<sup>149</sup>—and the NRA-PVF reported payments to Starboard at OnMessage's Maryland office, which is consistent with past practices: during the 2014 and 2016 election cycles NRA-ILA and NRA-PVF consistently reported payments to Starboard at OnMessage's addresses,<sup>150</sup> and OnMessage has publicly taken credit for those advertisements that the NRA-ILA and NRA-PVF reported paying Starboard to produce (and has even won awards for such ads).<sup>151</sup> Former employees say that Starboard had no presence at OnMessage offices, an email from an OnMessage partner/Starboard director offering a job

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

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

<sup>&</sup>lt;sup>148</sup> See ¶¶ 15-16.

<sup>&</sup>lt;sup>149</sup> See ¶¶ 8, 15.

<sup>150</sup> See ¶¶ 18-19, 22-23.

See ¶¶ 25-27.

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

of Starboard provides reason to believe that the purpose of OnMessage's creation of Starboard was to allow OnMessage to use or convey to the NRA-PVF information about the "plans, projects, activities or needs" of the candidates it supports—in this instance, Josh Hawley for Senate—and that here, such information was "material to the creation, production, or distribution" of the NRA-ILA's communications supporting Hawley.<sup>155</sup> This

1.

are unlikely to prevent the circumvention of the rules." 68 Fed. Reg. 421, 435 (Jan. 3, 2003).

*See* ¶¶ 31-32.

The 2013-14 election cycle was the only time a candidate or committee besides the two NRA entities listed Starboard as a vendor on reports filed with the Commission. In May 2013, the National Republican Congressional Committee (ID: C00075820) made two "media" disbursements to Starboard, totaling \$18,500. National Republican Congressional Committee, Disbursements to Starboard Strategic, Inc., 2013-14, <a href="https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2014&data\_type=processed&committee\_id">https://www.fec.gov/data/disbursements/?two\_year\_transaction\_period=2014&data\_type=processed&committee\_id</a>

<sup>=</sup>C00075820&min\_date=01%2F01%2F2013&max\_date=12%2F31%2F2014.

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

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

#### National Media/AMAG

- Additionally, during the same period that Josh Hawley for Senate was contracting with National Media and an affiliate to distribute its communications, the NRA-PVF was contracting with an entity that is legally indistinguishable from National Media to distribute communications expressly advocating for Hawley's election or against his opponent's election.
- 68. "Red Eagle" is a trade name for the political consulting firm National Media, according to Virginia Corporation Commission records. AMAG is "affiliated" with National Media, according to its attorney. National Media, Red Eagle, and AMAG are located at the same address—815 Slaters Lane in Alexandria, Virginia, the same address as OnMessage and AMAG are signed by National Media employees.
- 69. The NRA-PVF's independent expenditures supporting Hawley have been placed by Red Eagle, and the relevant contracts and documents were signed by National Media employees. <sup>161</sup> Josh Hawley for Senate advertisements have been placed by AMAG, and the

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

<sup>&</sup>lt;sup>157</sup> See ¶42.

<sup>&</sup>lt;sup>158</sup> See ¶46.

<sup>159</sup> See ¶¶42-43, 46.

See ¶¶44, 47.

<sup>&</sup>lt;sup>161</sup> See ¶44.

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

- 70. In at least one instance, the same National Media official placed advertisements on behalf of the NRA-PVF and Josh Hawley for Senate at the same station on the same day.
  - a) On September 6, 2018, National Media "Director of Accounting" Jon Ferrell signed FCC records on behalf of Red Eagle placing the NRA-PVF's pro-Hawley ads on Missouri station KYTV. 164
  - b) On that same day, National Media's Ferrell signed FCC records on behalf of AMAG as "Jon Ferrell, agent for Josh Hawley for Senate" for a "coordinated buy" on behalf of "Josh Hawley for Senate/NRSC," also placed on KYTV.<sup>165</sup>
- 71. These facts and patterns of activity provide reason to believe that the purpose of the NRA-PVF placing its advertisements under a National Media trade name, while Josh Hawley for Senate contracted directly with National Media or its affiliates, was to allow National Media to use or convey to the NRA-PVF information about the "plans, projects, activities or needs" of Josh Hawley for Senate without detection, and that such information was "material to the creation, production, or distribution" of the NRA-ILA's communications supporting Hawley. This inference—and the apparent failure to comply with any firewall policy—is

<sup>&</sup>lt;sup>162</sup> See ¶47.

<sup>&</sup>lt;sup>163</sup> See ¶45.

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

<sup>165</sup> Exhibit Q at 2-3.

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

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

- 72. Taken together, these facts suggest an elaborate scheme designed to evade detection of violations of the Commission's common vendor coordination rules. OnMessage, led by Josh Hawley for Senate's top campaign consultant, appears to have deliberately routed the NRA-PVF's independent expenditures supporting Hawley through the corporate shell of Starboard, while Hawley's committee directly contracted with OnMessage. Then, those pro-Hawley communications were distributed and placed by National Media employees under the "Red Eagle" trade name, while Josh Hawley for Senate placed its own communications using National Media or its affiliate AMAG. In at least one instance, the same National Media official placed advertisements on behalf of both the NRA-PVF and Josh Hawley for Senate on the same stations and on the same day. The coordinated nature of this scheme is further demonstrated by the fact that all of the relevant companies or shell companies—OnMessage, Starboard, National Media, Red Eagle, American Media & Advocacy Group—are located or have been paid at the same addresses.
- 73. These facts and this pattern of activity provide reason to believe that Starboard/OnMessage and National Media used or conveyed to the NRA-PVF information about the "plans, projects, activities or needs" of Josh Hawley for Senate, and that such information was "material to the creation, production, [and] distribution of the communication[s]," *id.* § 109.21(d)(4).

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

- 74. For these reasons, there is reason to believe that the NRA-PVF and Josh Hawley for Senate satisfied the "conduct" standard by coordinating their communications through a "common vendor." 11 C.F.R. § 109.21(d)(4).
- 75. A payment for a coordinated communication is an in-kind contribution to the candidate committee or political party committee with which it is coordinated. 11 C.F.R. § 109.21(b).
- Therefore, because the NRA-PVF's advertisements supporting Hawley satisfy Section 109.21's three-prong test, there is reason to believe that the NRA-PVF has made in-kind contributions to Josh Hawley for Senate in the form of coordinated communications, in excess of FECA's \$2,700 limit on contributions by a non-multicandidate political committee to a candidate, 52 U.S.C. § 30116(a)(1), and in violation of FECA's reporting requirements. 52 U.S.C. § 30104(b).

#### PRAYER FOR RELIEF

- 77. Wherefore, the Commission should find reason to believe that the NRA-PVF and Josh Hawley for Senate violated 52 U.S.C. § 30101 *et seq.*, and should conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
- 78. The Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with the FECA.

Respectfully submitted,

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

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

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

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

October 22, 2018

## **VERIFICATION**

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

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center

Brendan M. Fischer

Sworn to and subscribed before me this Aday of October 2018.

Notary Public



For Giffords

Alison Damaskos

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

Bianca Gutierrez

Notary Public

EXP COLUMN

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

# EXHIBIT A



### COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION

#### 1303530890

#### Office of the Clerk

March 22, 2013

CRAIG M PALIK 1947 BARTON HILL ROAD RESTON, VA 20191

#### RECEIPT

RE: Starboard Strategic, Inc.

ID: 07626674

DCN: 13-03-22-5705

Dear Customer:

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

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

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

Sincerely,

Joel H. Peck

Clerk of the Commission

CORPROPT NEWCD CISECOM

### COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION

AT RICHMOND, MARCH 22, 2013

The State Corporation Commission has found the accompanying articles submitted on behalf of Starboard Strategic, Inc.

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

#### CERTIFICATE OF INCORPORATION

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

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

STATE CORPORATION COMMISSION

By Jan core

James C. Dimitri Commissioner

# ARTICLES OF INCORPORATION OF STARBOARD STRATEGIC, INC.

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

- 1. The name of the corporation is Starboard Strategic, Inc.
- The purpose for which the corporation is formed is to engage in any lawful business not required to be specifically set forth in these Articles for which a corporation may be incorporated under the Virginia Stock Corporation Act.
- 3. The corporation is authorized to issue 1,000 shares of common stock with a par value of \$1.0000 per share.
- 4. The name of the corporation's initial registered agent is Craig M Palik. The initial registered agent is an individual who is a resident of Virginia and a member of the Virginia State Bar.
- The address of the corporation's initial registered office, which is identical to the business office of the initial registered agent, is 1947 Barton Hill Road, Reston, VA 20191. The initial registered office is located in Fairfax County, Virginia.
- 6. The following individuals are to serve as an initial director of the corporation:

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

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

### 1303530890

#### INCORPORATOR:

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

Garth E. Beall

### **EXHIBIT B**



#### 2013 ANNUAL REPORT **COMMONWEALTH OF VIRGINIA** STATE CORPORATION COMMISSION

21305.3487--3/13/2013

(22) زئين).

 $\bigcirc$ 

હત્ડ

File online at sccefile.scc.virginia.gov CORPORATION NAME: OnMessage, Inc.

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

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

706 S WASHINGTON ST

STOCK INFORMATION

FALLS CHURCH, VA 22046

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

4. STATE OR COUNTRY OF INCORPORATION: **VA-VIRGINIA** 

5. 6100K IIII C	21 1101/77 1014
CLASS	AUTHORIZED
COMV	1,000

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

6. PRINCIPAL OFFI	ICE ADDRESS:
-------------------	--------------

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

7. DIRECTORS AND PRINCIPAL OFFICERS:

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

	cunless area below is blank:	If the block to the left is blank or contains incorre	
1   mormation is corre	ect [ ] Information is incorrect [ ] Delete information	box and enter information below: [ ] Correction	
	OFFICER M DIRECTOR M	OFFICER	DIRECTOR
NAME:	CURTIS ANDERSON	NAME:	
TITLE:	PRESIDENT	TITLE:	
ADDRESS:	2000 COLE RIDGE LANE	ADDRESS:	
CITY/ST/ZIP:	CROWNSVILLE, MD 21032	CITY/ST/ZIP:	

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

GNATURE OF DIRECTOR/OFFICE LISTED IN THIS REPORT

PRINTED NAME AND CORPORATE TITLE

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

+ 0415544 000004282 095CC1

AF00ZV Rov 15 2/11

#### **2013 ANNUAL REPORT CONTINUED**

CORPORATION NAME: OnMessage, Inc.

DUE DATE: 04/30/13 SCC ID NO.: 0636043-2 34659672

7. DIRECTORS AND PRINCIPAL OFFICERS (continued):

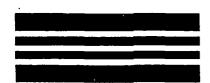
All directors and principal officers must be listed. An individual may be designated as both a director and an officer.

	ox unless area below is blank:  orrect     Information is incorrect [ ] Delete information	If the block to the left is blank or c and enter information below:	contains incorrect data, please mark appropriate box
	OFFICER [X DIRECTOR [X		OFFICER     DIRECTOR
NAME:	WESLEY ANDERSON	NAME:	•
TITLE:	CEO	TITLE:	
ADDRESS:	2512 CHAPMAN LN	ADDRESS:	
CITY/ST/ZIP:	DAVIDSONVILLE, MD 21035	CITY/ST/ZIP:	
	ox unless area below is blank: rrect     Information is incorrect   ] Delete information	If the block to the left is blank or c and enter information below:	contains incorrect data, please mark appropriate box
	OFFICER   X DIRECTOR [X		OFFICER     DIRECTOR
NAME:	BRADLEY TODD	NAME:	
TITLE:	coo	TITLE:	
ADDRESS:	722 SOUTH FAIRFAX	ADDRESS:	
CITY/ST/ZIP:	ALEXANDRIA, VA 22314	CITY/ST/ZIP:	
	ox unless area below is blank:  orrect [ ] Information is incorrect [ ] Delete information	If the block to the left is blank or c and enter information below:	contains incorrect data, please mark appropriate box
	rrect [ ] Information is incorrect [ ] Delete information		Correction   Addition   Replacement
Information is co	rrect [ ] Information is incorrect [ ] Delete information	and enter information below:	Correction   Addition   Replacement
Information is co	rrect [ ] Information is incorrect [ ] Delete information	and enter information below:  NAME:	Correction   Addition   Replacement
NAME:	rrect [ ] Information is incorrect [ ] Delete information	nnd enter information below:  NAME:  TITLE:	Correction   Addition   Replacement
NAME: TITLE: ADDRESS: CITY/ST/ZIP:	rrect [ ] Information is incorrect [ ] Delete information	nad enter information below:  NAME:  TITLE:  ADDRESS:  CITY/ST/ZIP:	Correction   Addition   Replacement
NAME: TITLE: ADDRESS: CITY/ST/ZIP:	OFFICER DIRECTOR over unless area below is blank:	and enter information below:  NAME:  TITLE:  ADDRESS:  CITY/ST/ZIP:	OFFICER   DIRECTOR   OFFICER   DIRECTOR   OFFICER   DIRECTOR   OFFICER   OFF
NAME: TITLE: ADDRESS: CITY/ST/ZIP:	OFFICER  DIRECTOR    over unless area below is blank:  over cot [ ] Information is incorrect [ ] Delete information	and enter information below:  NAME:  TITLE:  ADDRESS:  CITY/ST/ZIP:	OFFICER   DIRECTOR   OFFICER   DIRECTOR   OFFICER   Addition   Replacement
NAME: TITLE: ADDRESS: CITY/ST/ZIP: Mark appropriate b	OFFICER  DIRECTOR    over unless area below is blank:  over cot [ ] Information is incorrect [ ] Delete information	nand enter information below:  NAME:  TITLE:  ADDRESS:  CITY/ST/ZIP:  If the block to the left is blank or cand enter information below:	OFFICER   DIRECTOR   OFFICER   DIRECTOR   OFFICER   Addition   Replacement
NAME: TITLE: ADDRESS: CITY/ST/ZIP: Mark appropriate b	OFFICER  DIRECTOR    over unless area below is blank:  over cot [ ] Information is incorrect [ ] Delete information	nand enter information below:  NAME:  TITLE:  ADDRESS:  CITY/ST/ZIP:  If the block to the left is blank or cand enter information below:  NAME:	OFFICER   DIRECTOR   OFFICER   DIRECTOR   OFFICER   Addition   Replacement

AF00ZW Rev 3 3/11



### EXHIBIT C



### 2014 ANNUAL REPORT COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION

File online at sccefile.scc.virginia.gov



母いののは母

1. CORPORATION NAME: OnMessage, Inc.

DUE DATE: 04/30/14

SCC ID NO.: 0636043-2

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

000.5 .....

706 S WASHINGTON ST

5. STOCK INFORMATION

FALLS	CHURCH,	VA	22046
-------	---------	----	-------

- CITY OR COUNTY OF VA REGISTERED OFFICE: 304-FALLS CHURCH CITY (FILED I
- 4. STATE OR COUNTRY OF INCORPORATION: VA-VIRGINIA

PRINCIPAL OFFICE ADDRESS:

). OTOOK IIV	TOTIVIATION
CLASS	AUTHORIZED
COMV	1,000
	1,1

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

Mark this box if address shown below is correct	If the block to the left is blank or contains incorrect data please add or correct the address below.
ADDRESS: 815 SLATERS LANE	ADDRESS:
CITY/ST/ZIP ALEXANDRIA, VA 22314	CITY/ST/ZIP CITY/ST/ZIP
	s and principal officers must be listed. all may be designated as both a director and an officer.
Mark appropriate box unless area below is blank:	If the block to the left is blank or contains incorrect data, please mark appropriate
☐ Information is correct ☐ Information is incorrect ☐ Delete information	box and enter information below:  Correction  Addition  Replacement
OFFICER (X) DIRECTOR (X)	OFFICER □ DIRECTOR □
NAME: CURTIS ANDERSON	NAME:
TITLE: PRESIDENT	TITLE:
ADDRESS: 2000 COLE RIDGE LANE	ADDRESS:
CITY/ST/ZIP: CROWNSVILLE, MD 21032	CITY/ST/ZIP:

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

SIGNATURE OF DIRECTOR/OFFICER LISTED IN THIS REPORT Nes Androon Uzo

DATE

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

+ 0467346 000003012 09SCC1

AF007V Rev 15 2/11

#### **2014 ANNUAL REPORT CONTINUED**

اأسح
D
(U)
ΟÚ
Ų٩
<b>(</b>

CORPORATI	ON	NAME:
OnMessage,	inc.	

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

7. DIRECTORS AND PRINCIPAL OFFICERS (continued):

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

Mark appropriate box un Information is correct	less area below is blank:	If the block to the left is blank or co and enter information below:	ontains incorrect data, please mark appropriate box
	OFFICER [X] DIRECTOR [X]		OFFICER DIRECTORX
NAME: WE	ESLEY ANDERSON	NAME: GRahum	Shafer
TITLE: CE	0	TITLE: Partne	R
ADDRESS: 251	12 CHAPMAN LN .	ADDRESS: 2203	s South Rd
CITY/ST/ZIP: DA	VIDSONVILLE, MD 21035	CITY/ST/ZIP: Ball	imne MD 21209
	nless area below is blank:  Information is incorrect Delete information	If the block to the left is blank or co	ontains incorrect data, please mark appropriate box
	OFFICER [X DIRECTOR [X		OFFICER DIRECTOR
NAME: BR	ADLEY TODD	NAME: Timothy	
TITLE: CO	00	TITLE: Partn	DV DV
ADDRESS: 722	2 SOUTH FAIRFAX	ADDRESS: 305	Woodstone DR
CITY/ST/ZIP: ALI	EXANDRIA, VA 22314	CITY/ST/ZIP: Bato	nRouge, LA >0810
	nless area below is blank:  Information is incorrect Delete information	If the block to the left is blank or c and enter information below:	ontains incorrect data, please mark appropriate box  Correction Addition Replacement
	OFFICER ☐ DIRECTOR ☐		2
	OFFICER   DIRECTOR		OFFICER 🕅 DIRECTOR 🗆
NAME:	OFFICER   DIRECTOR	NAME: ORRIN	
NAME: TITLE:	OFFICER   DIRECTOR	NAME: ORRIN	Harrison
	OFFICER   DIRECTOR		Harrison
TITLE:	OFFICER   DIRECTOR	TITLE: Pakting	Harrison
TITLE: ADDRESS: CITY/ST/ZIP: Mark appropriate box un	nless area below is blank:	TITLE: Pakting ADDRESS: 414 CITY/ST/ZIP: Ala	Harrison Tyler PL
TITLE: ADDRESS: CITY/ST/ZIP: Mark appropriate box un	nless area below is blank:	TITLE: Pakting ADDRESS: 414 CITY/ST/ZIP: Alog	Harrison Ther PL  xandria, VA 22302  ontains incorrect data, please mark appropriate box
TITLE: ADDRESS: CITY/ST/ZIP: Mark appropriate box un	nless area below is blank:	TITLE: Pakting ADDRESS: 414 CITY/ST/ZIP: Alog	Harrison  Ther PL  Xandria, VA 22302  Ontains incorrect data, please mark appropriate box  Correction Addition Replacement
TITLE: ADDRESS: CITY/ST/ZIP:  Mark appropriate box ur	nless area below is blank:	TITLE: Pakting ADDRESS: 414 CITY/ST/ZIP: Alor If the block to the left is blank or cand enter information below:	Harrison  Ther PL  Xandria, VA 22302  Ontains incorrect data, please mark appropriate box  Correction Addition Replacement
TITLE: ADDRESS: CITY/ST/ZIP:  Mark appropriate box ur information is correct	nless area below is blank:	TITLE: Pakting ADDRESS: 414 CITY/ST/ZIP: Alog If the block to the left is blank or cand enter information below:  NAME:	Harrison  Ther PL  Xandria, VA 22302  Ontains incorrect data, please mark appropriate box  Correction Addition Replacement

AF00ZW Rev 3 3/11

### EXHIBIT D



#### 2015 ANNUAL REPORT **COMMONWEALTH OF VIRGINIA** STATE CORPORATION COMMISSION

File online at sccefile.scc.virginia.gov



1.	CORF	ORAT	ION I	NAME

Starboard Strategic, Inc.

DUE DATE: 03/31/15

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

SCC ID NO .: 0762667-4

**CRAIG M PALIK** 1947 BARTON HILL ROAD RESTON, VA 20191

5. STOCK INFORMATION

		CLASS	AUTHORIZED
3.	CITY OR COUNTY OF VA REGISTERED OFFICE: 129-FAIRFAX COUNTY	COMMON	1,000
4.	STATE OR COUNTRY OF INCORPORATION: VA-VIRGINIA		

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

6. PRINCIPAL OFFICE ADDRESS:

		$\omega$	
Mark this box if address shown below is correct	If the block to the left is blank or contains incorrect data please add or address below.	Popreci	mei Z
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:	PH 12: 20	10.50 10.50
CITY/ST/ZIP RESTON, VA 20191	CITY/ST/ZIP		

7. DIRECTORS AND PRINCIPAL OFFICERS:

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

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

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

SIGNATURE OF DIRECTORIORFICER

PRINTED NAME AND CORPORATE TITLE

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



#### **2015 ANNUAL REPORT CONTINUED**

**CORPORATION NAME:** Starboard Strategic, Inc. DUE DATE: 03/31/15 SCC ID NO .: 0762667-4

All directors and principal officers must be fisted.

7. DIRECTORS AND PRINCIPAL OFFICERS: (continued)	An individual may be designated as both a director and an officer.					
Mark appropriate box unless area below is blank:  [A Information is correct	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:  Correction Addition Replacement					
OFFICER 🔀 DIRECTOR 🔀	OFFICER   DIRECTOR					
NAME: WESLEY ANDERSON	NAME:					
TITLE: PRESIDENT	TITLE:					
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:					
CITY/ST/ZIP: RESTON, VA 20191	CITY/ST/ZIP:					
Mark appropriate box unless area below is blank:	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:					
Information is correct  Information is incorrect  Delete information	Correction Addition Replacement					
OFFICER 🕱 DIRECTOR 🔀	OFFICER   DIRECTOR					
NAME: BRADLEY TODD	NAME:					
TITLE: PRESIDENT	TITLE:					
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:					
CITY/ST/ZIP: RESTON, VA 20191	CITY/ST/ZIP:					
Mark appropriate box unless area below is blank:	If the block to the left is blank or contains incorrect data, please mark appropriate					
Information is correct   Information is incorrect   Delete information	box and enter information below: Correction Addition Replacement					
OFFICER DIRECTOR	OFFICER   DIRECTOR					
NAME: GRAHAM SHAFER	NAME:					
TITLE: PRESIDENT	TITLE:					
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:					
CITY/ST/ZIP: RESTON, VA 20191	CITY/ST/ZIP:					
Mark appropriate box unless area below is blank:	If the block to the left is blank or contains incorrect data, please mark appropriate					
Information is correct  Information is incorrect  Delete information	box and enter information below: Correction Addition Replacement					
OFFICER DIRECTOR	OFFICER   DIRECTOR					
NAME: TIMOTHY TEEPELL	NAME:					
TITLE: VICE PRESIDENT	TITLE:					
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:					
CITY/ST/ZIP: RESTON, VA 20191	CITY/ST/ZIP:					



### EXHIBIT E



# 2018 ANNUAL REPORT COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION

CORPORATION NAME:     Starboard Strategic, Inc.	DUE DATE: 03/31/18					
•	<b>2022</b> , <b>2</b> .					
<ol><li>VA REGISTERED AGENT NAME AND OFFICE ADDRES CRAIG M PALIK</li></ol>	SS: ATTY. SCC ID NO.: 0762667-4					
1947 BARTON HILL ROAD RESTON, VA 20191	5. STOCK INFORMATION					
	CLASS AUTHORIZED					
3. CITY OR COUNTY OF VA REGISTERED OFFICE: 129-FAIRFAX COUNTY	COMMON 1,000					
4. STATE OR COUNTRY OF INCORPORATION: VA-VIRGINIA						
DO NOT ATTEMPT TO ALTER THE INFORMATION ABO print in black only.	VE. Carefully read the enclosed instructions. Type or					
6. PRINCIPAL OFFICE ADDRESS:						
Mark this box if address shown below is correct	If the block to the left is blank or contains incorrect data please add or correct the address below.					
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:					
CITY/ST/ZIP RESTON, VA 20191	CITY/ST/ZIP					
	ors and principal officers must be listed. Iual may be designated as both a director and an officer.					
, , , , , , , , , , , , , , , , , , , ,	I					
Mark appropriate box unless area below is blank:  Mark appropriate box unless area below is blank:  Information is correct ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:  Correction Addition Replacement					
OFFICER X DIRECTOR X	OFFICER   DIRECTOR					
NAME: CURT ANDERSON	NAME:					
TITLE: PRESIDENT	TITLE:					
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:					
CITY/ST/ZIP: RESTON, VA 20191	CITY/ST/ZIP:					

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

SIGNATURE OF DIRECTOR/OFFICER LISTED IN THIS REPORT Partner., Curt Anderson PRINTED NAME AND CORPORATE TITLE

DATE

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

0002106

#### **2018 ANNUAL REPORT CONTINUED**

**CORPORATION NAME:** Starboard Strategic, Inc. DUE DATE: 03/31/18 SCC ID NO.: 0762667-4

All directors and principal officers must be listed.

7. DIRECTORS AND PRINCIPAL OFFICERS: (continued)	An individual may be designated as both a director and an officer.				
Mark appropriate box unless area below is blank:    Mark appropriate box unless area below is blank:   Information is correct	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:				
OFFICER 🗖 DIRECTOR 🗌	OFFICER   DIRECTOR				
NAME: GRAHAM SHAFER	NAME:				
TITLE: PRESIDENT	TITLE:				
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:				
CITY/ST/ZIP: RESTON, VA 20191	CITY/ST/ZIP:				
Mark appropriate box unless area below is blank:  Mark appropriate box unless area below is blank:  Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:   Correction  Addition  Replacement				
OFFICER ☑ DIRECTOR ☐	OFFICER   DIRECTOR				
NAME: TIMOTHY TEEPELL	NAME:				
TITLE: VICE PRESIDENT	TITLE:				
ADDRESS: 1947 BARTON HILL ROAD	ADDRESS:				
CITY/ST/ZIP: RESTON, VA 20191	CITY/ST/ZIP:				
Mark appropriate box unless area below is blank:  ✓ Information is correct □ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:  Correction Addition Replacement				
	hox and enter information below:				
Information is correct ☐ Information is incorrect ☐ Delete information	box and enter information below: Correction Addition Replacement				
Information is correct ☐ Information is incorrect ☐ Delete information  OFFICER ☑ DIRECTOR ☑	box and enter information below:  Correction Addition Replacement  OFFICER DIRECTOR				
Information is correct   Information is incorrect   Delete information   OFFICER   DIRECTOR   DIREC	box and enter information below:  Correction Addition Replacement  OFFICER DIRECTOR  NAME:				
Information is correct   Information is incorrect   Delete information    OFFICER   DIRECTOR   DIRE	DIRECTOR   NAME:				
Information is correct   Information is incorrect   Delete information    OFFICER   DIRECTOR   DIRE	DIRECTOR   NAME: TITLE: ADDRESS:				
OFFICER DIRECTOR NAME: WES ANDERSON TITLE: PARTNER ADDRESS: 2512 CHAPMAN LANE CITY/ST/ZIP: DAVIDSONVILLE, MD 21035  Mark appropriate box unless area below is blank:	DIRECTOR DIRECTOR NAME:  TITLE:  ADDRESS:  CITY/ST/ZIP:  If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:				
OFFICER  Delete information  OFFICER  DIRECTOR    NAME: WES ANDERSON  TITLE: PARTNER  ADDRESS: 2512 CHAPMAN LANE  CITY/ST/ZIP: DAVIDSONVILLE, MD 21035  Mark appropriate box unless area below is blank:  Information is correct  Information is incorrect  Delete information	OFFICER DIRECTOR NAME: TITLE: ADDRESS: CITY/ST/ZIP:  If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: Correction Addition Replacement				
OFFICER DIRECTOR NAME: WES ANDERSON TITLE: PARTNER ADDRESS: 2512 CHAPMAN LANE CITY/ST/ZIP: DAVIDSONVILLE, MD 21035  Mark appropriate box unless area below is blank: Information is correct Information is incorrect Delete information  OFFICER DIRECTOR DIREC	DIRECTOR DIRECTOR DIRECTOR DIRECTOR DIRECTOR CITY/ST/ZIP:  If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:  OFFICER DIRECTOR DIREC				
OFFICER DIRECTOR NAME: WES ANDERSON TITLE: PARTNER ADDRESS: 2512 CHAPMAN LANE CITY/ST/ZIP: DAVIDSONVILLE, MD 21035  Mark appropriate box unless area below is blank: Information is correct Information is incorrect Delete information OFFICER DIRECTOR NAME: ORRIN HARRISON	OFFICER DIRECTOR NAME:  If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:  OFFICER DIRECTOR NAME:  OFFICER DIRECTOR NAME:				

Addition

officer & Director &

Brad Todd Partner 307 West Walnut Street Alexandria, VA ZZ301

0002108



### **EXHIBIT F**



# 2018 ANNUAL REPORT COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION



· · ·							
1. CORPORATION NAME:							
OnMessage, Inc.	[	DUE DATE:	04/30/18				
2. VA REGISTERED AGENT NAME AND OFFICE ADDRES	SS: ATTY.	SCC ID NO.:	0636043-2				
706 S WASHINGTON ST FALLS CHURCH, VA 22046	Ę	5. STOCK IN	IFORMATION				
FALLS CHORCH, VA 22040	Г	CLASS	AUTHORIZED				
3. CITY OR COUNTY OF VA REGISTERED OFFICE:		COMV	1,000				
304-FALLS CHURCH CITY (FILED I							
<ol> <li>STATE OR COUNTRY OF INCORPORATION: VA-VIRGINIA</li> </ol>							
DO NOT ATTEMPT TO ALTER THE INFORMATION ABO print in black only.  6. PRINCIPAL OFFICE ADDRESS:	VE. Carefully read	the enclosed	instructions. Type or				
	If the block to the left is his	ank or contains inco	prect data please add or correct the				
Mark this box if address shown below is correct	address below.						
ADDRESS: 815 SLATERS LANE	ADDRESS:						
CITY/ST/ZIP ALEXANDRIA, VA 22314	CITY/ST/ZIP						
	rs and principal officers mu ual may be designated as h		d an officer.				
Mark appropriate box unless area below is blank:	If the block to the left is blank box and enter information be	low.	ct data, please mark appropriate				
☐ Information is correct ☐ Information is incorrect ☐ Delete information		Correc	tion				
OFFICER 🗵 DIRECTOR 🗓		OFFICE	R 🗌 DIRECTOR 🔲				
NAME: CURTIS ANDERSON	NAME:						
TITLE: PARTNER	TITLE:						
ADDRESS: 2000 COLERIDGE LANE	ADDRESS:						
CITY/ST/ZIP: CROWNSVILLE, MD 21032	CITY/ST/ZIP:						
I affirm that the information contained in this report is accurat	e and complete as of	the date belo	ow.				

SIGNATURE OF DIRECTOR/OFFICER LISTED IN THIS REPORT PRINTED NAME AND CORPORATE TITLE

C/C.1/18

DATE

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

0003055



#### **2018 ANNUAL REPORT CONTINUED**

**CORPORATION NAME:** OnMessage, Inc.

DUE DATE:

04/30/18

SCC ID NO.: 0636043-2

All directors and principal officers must be listed

7. DIRECTORS AND PRINCIPAL OFFICERS: (continued)	An individual may be designated as both a director and an officer.					
Mark appropriate box unless area below is blank:   ☐ Information is incorrect ☐ Delete information	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:  Correction Addition Replacement					
OFFICER X DIRECTOR X	OFFICER   DIRECTOR					
NAME: ORRIN HARRISON	NAME:					
TITLE: PARTNER	TITLE:					
ADDRESS: 414 TYLER PLACE	ADDRESS:					
CITY/ST/ZIP: ALEXANDRIA, VA 22302	CITY/ST/ZIP:					
Mark appropriate box unless area below is blank:   [X] Information is correct	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:					
	Correction Addition Replacement					
OFFICER 🛛 DIRECTOR 🛣	OFFICER   DIRECTOR					
NAME: GRAHAM SHAFER	NAME:					
TITLE: PARTER	TITLE;					
ADDRESS: 2203 SOUTH RD	ADDRESS:					
CITY/ST/ZIP: BALTIMORE, MD 21209	CITY/ST/ZIP:					
Mark appropriate box unless area below is blank:  [X] Information is correct	If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:					
- I want to the second of the	box and enter information below:					
☐ Information is correct ☐ Information is incorrect ☐ Delete information	box and enter information below: Correction Addition Replacement					
☐ Information is correct ☐ Information is incorrect ☐ Delete information  OFFICER ☑ DIRECTOR ☑	box and enter information below:  Correction Addition Replacement  OFFICER DIRECTOR					
□ Information is correct □ Information is incorrect □ Delete information  OFFICER ☑ DIRECTOR ☑  NAME: TIMOTHY TEEPELL	box and enter information below:  Correction Addition Replacement  OFFICER DIRECTOR  NAME:					
☐ Information is correct ☐ Information is incorrect ☐ Delete information  OFFICER ☑ DIRECTOR ☑  NAME: TIMOTHY TEEPELL  TITLE: PARTNER	box and enter information below:  Correction Addition Replacement  OFFICER DIRECTOR  NAME:  TITLE:					
OFFICER DIRECTOR NAME: TIMOTHY TEEPELL TITLE: PARTNER ADDRESS: 305 WOODSTONE DR	DIRECTOR   NAME:  TITLE:  ADDRESS:					
OFFICER DIRECTOR NAME: TIMOTHY TEEPELL TITLE: PARTNER ADDRESS: 305 WOODSTONE DR CITY/ST/ZIP: BATON ROUGE, LA 70810  Mark appropriate box unless area below is blank:	DIRECTOR DIRECTOR NAME:  TITLE:  ADDRESS:  CITY/ST/ZIP:  If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:					
OFFICER DIRECTOR NAME: TIMOTHY TEEPELL TITLE: PARTNER ADDRESS: 305 WOODSTONE DR CITY/ST/ZIP: BATON ROUGE, LA 70810  Mark appropriate box unless area below is blank: Information is correct   Information is incorrect   Delete information	DIRECTOR DIRECTOR NAME:  TITLE:  ADDRESS:  CITY/ST/ZIP:  If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:  Correction Addition Replacement					
OFFICER DIRECTOR NAME: TIMOTHY TEEPELL TITLE: PARTNER ADDRESS: 305 WOODSTONE DR CITY/ST/ZIP: BATON ROUGE, LA 70810  Mark appropriate box unless area below is blank: Information is correct Information is incorrect Delete information  OFFICER DIRECTOR DIREC	DIRECTOR DIRECTOR NAME: TITLE: ADDRESS: CITY/ST/ZIP:  If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below:  OFFICER DIRECTOR D					
OFFICER DIRECTOR NAME: TIMOTHY TEEPELL TITLE: PARTNER ADDRESS: 305 WOODSTONE DR CITY/ST/ZIP: BATON ROUGE, LA 70810  Mark appropriate box unless area below is blank: Information is correct Information is incorrect Delete information  OFFICER DIRECTOR NAME: BRAD TODD	DIRECTOR DIRECTOR NAME:  TITLE: ADDRESS: CITY/ST/ZIP:  If the block to the left is blank or contains incorrect data, please mark appropriate box and enter information below: Correction Addition Replacement  OFFICER DIRECTOR NAME:					
OFFICER DIRECTOR NAME: TIMOTHY TEEPELL TITLE: PARTNER ADDRESS: 305 WOODSTONE DR CITY/ST/ZIP: BATON ROUGE, LA 70810  Mark appropriate box unless area below is blank: Information is correct Information is incorrect Delete information  OFFICER DIRECTOR NAME: BRAD TODD  TITLE: PARTNER	DIRECTOR DIR					

Addition Officer A Director A
Wesley Anderson
2512 Chapman Ln
Davidsonwille, MD 21035

### EXHIBIT G

Product Code

1209

Advertiser Ref

#### CONTRACT



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

And:

**Red Eagle Media** 815 Slaters Lane Alexandria, VA 22314

	Contract / Rev	vision		Alt Order #	•
	81109	/		26143436	
Product					
MO Senate					
Contract Dates	Estimate #				
10/01/18 - 10/21/18	9911				
Advertiser			Or	iginal Date	Revision /
NRA-PVF			(	09/06/18	/ 09/06/18
	Billing Cycle	Billing	Cal	endar	Cash/Trade
	EOM/EOC	Broado	ast		Cash
	Station	Accou	nt E	xecutive	Sales Office
	KOAM	Bill The	oma	as	Washington DC
	Special Handl	I g g ling			
	Demographic Adults 35+				

Advertiser Code

IDB#

9915593

Agency Ref

				Start/End		Spots/				
*Line Ch Start	Date End D	ate Description	on	Time	Days	Length Week	Rate	TypeS	pots	Amount
N 1 KOAM 10/01			rning News	530a-7a		:30		NM	15	\$8,250.00
Start Date	End Date	Weekdays	Spots/Week	Rate						
Week: 10/01/18	10/07/18	MTWTF	5	\$550.00						
Week: 10/08/18	10/14/18	MTWTF	5	\$550.00						
Week: 10/15/18	10/21/18	MTWTF	5	\$550.00						
N 2 KOAM 10/01			U	7-9a		:30		NM	15	\$7,500.00
Start Date	End Date	Weekdays	Spots/Week	Rate						
Week: 10/01/18	10/07/18	MTWTF	5	\$500.00						
Week: 10/08/18	10/14/18	MTWTF	5	\$500.00						
Week: 10/15/18	10/21/18	MTWTF	5	\$500.00						
N 3 KOAM 10/01				9-10a		:30		NM	3	\$480.00
Start Date	End Date	Weekdays	Spots/Week	Rate						
Week: 10/01/18 Week: 10/08/18	10/07/18 10/14/18	MTWTF	1	\$160.00 \$160.00						
Week: 10/15/18	10/14/18	MTWTF	1	\$160.00 \$160.00						
				•					_	
N 4 KOAM 10/01			,	10-11a		:30		NM	6	\$3,300.00
Week: Start Date	End Date 10/07/18	Weekdays MTWTF	Spots/Week 2	Rate \$550.00						
Week: 10/01/18	10/07/18	MTWTF	2	\$550.00 \$550.00						
Week: 10/05/18	10/14/18	MTWTF	2	\$550.00 \$550.00						
				******		22		NIN 4	0	<b>#4.000.00</b>
N 5 KOAM 10/01. Start Date				12n-1230p		:30		NM	6	\$4,200.00
Week: 10/01/18	End Date 10/07/18	<u>Weekdays</u> MTWTF	Spots/Week 2	<u>Rate</u> \$700.00						
Week: 10/08/18	10/14/18	MTWTF	2	\$700.00						
Week: 10/15/18	10/21/18	MTWTF	2	\$700.00						
N 6 KOAM 10/01			<del>_</del>	· · · · · · · · · · · · · · · · · · ·		:30		NM	4	<b>¢</b> E 200 00
Start Date	End Date	18 KOAM Nev Weekdays	Spots/Week	5-530p Rate		.30		INIVI	4	\$5,200.00
Week: 10/01/18	10/07/18	MTWTF	1	\$1,30 <u>0.00</u>						
Week: 10/08/18	10/14/18	MTWTF	2	\$1,300.00						
Week: 10/15/18	10/21/18	MTWTF	1	\$1,300.00						
N 7 KOAM 10/01			ws at 6nm	6-630p		:30		NM	15	\$22,500.00
Start Date	End Date	Weekdays	Spots/Week	Rate		.50		INIVI	13	ΨΖΖ,300.00
Week: 10/01/18	10/07/18	MTWTF	<u> 5</u>	\$1,500.00						
								•		

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

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

Page 2 of 3 Contract Agreement Between: Print Date 09/06/18



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

	Contract / Revision	Alt Order #	
	81109 /	26143436	
Contract Dates	Product	Estimate #	]
10/01/18 - 10/21/18	MO Senate	9911	

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

	Start/End	Spots/			
*Line Ch Start Date End Date Description	Time	Days Length Week Rate	Type Spo	ts	Amount
Start Date End Date Weekdays Spots/Week	Rate				
Week: 10/08/18 10/14/18 MTWTF- 5	\$1,50 <u>0.00</u>				
Week: 10/15/18 10/21/18 MTWTF 5	\$1,500.00				
N 8 KOAM 10/01/18 10/19/18 Wheel of Fortune M-F	630-7p	:30	NM	6	\$15,000.00
Start Date Week: 10/01/18 End Date Weekdays MTWTF Spots/Week	Rate \$2,500.00				
Week: 10/08/18 10/14/18 MTWTF 2	\$2,500.00				
Week: 10/15/18 10/21/18 MTWTF 2	\$2,500.00				
N 9 KOAM 10/06/18 10/20/18 Wheel of Fortune Sat	630-7p	:30	NM	4	\$3,200.00
Start Date End Date Weekdays Spots/Week	Rate	.50	INIVI	4	φ3,200.00
Week: 10/01/18 10/07/18 S- 1	\$800.00		i		
Week: 10/08/18 10/14/18 S- 2	\$800.00				
Week: 10/15/18 10/21/18S- 1	\$800.00				
N 10 KOAM 10/09/18 10/09/18 Tuesday 7-8p	7-8p	:30	NM	1	\$2,400.00
Start Date End Date Weekdays Spots/Week	Rate				<b>4</b> =,
Week: 10/08/18 10/14/18 -T 1	\$2,400.00				
N 11 KOAM 10/02/18 10/16/18 Tuesday 8-9p	8-9p	:30	NM	2	\$4,400.00
Start Date	Rate		I		
Week: 10/01/18 10/07/18 -T 1	\$2,200.00				
Week: 10/08/18 10/14/18 0	\$0.00				
Week: 10/15/18 10/21/18 - T 1	\$2,200.00				
N 12 KOAM 10/19/18 10/19/18 Friday 7-8p	7-8p	:30	NM	1	\$1,400.00
Start Date End Date Weekdays Spots/Week	Rate				
Week: 10/15/18 10/21/18F 1	\$1,400.00				
N 13 KOAM 10/12/18 10/12/18 Friday 8-9p	8-9p	:30	NM	1	\$1,400.00
Start Date Weekl: 10/08/18 10/14/18 Weekdays Spots/Week	<u>Rate</u> \$1,400.00				
1100111 10700710 10711710 1		00	NINA	•	<b>#</b> 0.000.00
N 14 KOAM 10/05/18 10/19/18 Friday 9-10p Start Date End Date Weekdays Spots/Week	9-10p	:30	NM	2	\$2,800.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> Week: 10/01/18	<u>Rate</u> \$1,400.00				
Week: 10/08/18 10/14/18 0	\$0.00				
Week: 10/15/18 10/21/18 F 1	\$1,400.00				
N 15 KOAM 10/01/18 10/19/18 KOAM News at 10p	10-1035p	:30	NM	5	\$9,000.00
Start Date End Date Weekdays Spots/Week	Rate	.00		Ü	ψ0,000.00
Week: 10/01/18 10/07/18 MTWTF 2	\$1,800.00				
Week: 10/08/18	\$1,800.00		i		
Week: 10/15/18 10/21/18 MTWTF 2	\$1,800.00				
N 16 KOAM 10/06/18 10/20/18 KOAM News at 10p	10-1035p	:30	NM	3	\$3,300.00
Start Date	Rate				
Week: 10/01/18 10/07/18S- 1	\$1,100.00				
Week: 10/08/18 10/14/18S- 1	\$1,100.00				
Week: 10/15/18 10/21/18S- 1	\$1,100.00				
N 17 KOAM 10/07/18 10/14/18 KOAM News at 10p	10-1035p	:30	NM	2	\$2,500.00
Start Date Week: 10/01/18 End Date Weekdays Spots/Week	Rate \$1.350.00				
	\$1,25 <del>0.00</del>				
	\$1,250.00			_	
N 18 KOAM 10/01/18 10/19/18 M-F 1035p-1137p	1035-1137p	:30	NM	9	\$3,150.00
Week: 10/01/18 End Date Weekdays Spots/Week 10/07/18 MTWTF 3	Rate \$350.00				
Week: 10/08/18 10/14/18 MTWTF 3	\$350.00				
	Ψ500.00		I		

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

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

Contract Agreement Between: Print Date 09/06/18 Page 3 of 3



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

	Contract / Revision	Alt Order #		
	81109 /	26143436		
Contract Dates	Product	Estimate #		
10/01/18 - 10/21/18	MO Senate	9911		
Advertiser	Or	Original Date / Revision		

/ 09/06/18

09/06/18

*Line Ch Start Date End Date Description	Start/End Time [	Spots/ Days Length Week Rate Ty	rpe Spots Amount
Start Date   End Date   Weekdays   Spots/	Week <u>Rate</u> \$350.00		
N 19 KOAM 10/06/18 10/20/18 Sat 1035-1105p  Start Date Week: 10/01/18 End Date 10/07/18 Weekdays Week: 10/08/18 10/14/18S- 1 Week: 10/15/18 10/21/18S- 1	1035-1105p Week Rate \$300.00 \$300.00	:30 N	M 3 \$900.00
	¥.100.00	Totals	103 \$100,880.00

NRA-PVF

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

Signature:	Date:

### EXHIBIT H

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

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

O Rejected

Request was:

board of directors\*: Jon Proch – Treasurer Brain Walsh - President

X Accepted

Check one:	<b>X</b> Original Form	O Supplement to Form	m (Date:	)
	TV ase request: 10/3/18 Station employee: Jennife	r Hyslop		
•	Eagle Media Group n: Michael Eyerman			
Address: 815	Slaters Lane, Alexandria,	, VA 22314		
Phone #: (202	2) 872-1155			
<mark>spot</mark> List <b>all</b> candid	·	office that that candidate	e "None"): to be filled out upon e is seeking—whether or not a upon receiving spot	<del>,</del>
List every Fed spot	deral election referenced i	n the spot (if none, state	e "None"): to be filled out up	on receiving
Address: 2205 Phone #: Phone	name): America First Act 5 Main Line Blvd. Alexar ne Number not listed/four on (if different from Agen	ndria, VA 222301 nd in google search, We	ebsite: https://www.a1apac.org	g/
List of the Sp	onsor's chief executive of	fficers or members of its	s executive committee or mer	mbers of its

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

### EXHIBIT I

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

(to be completed in full at the time of the initial purchase request and supplemented as necessary--

for example, if the purchaser should provide multiple spots with different reportable content)

Request was: X Accepted O Rejected
Check one: X Original Form O Supplement to Form (Date:
Station: WRTV Date of purchase request: 4/19/18 Responsible Station employee: Jennifer Hyslop
Agency: Red Eagle Media Contact person: Melissa Sharp Address: 815 Slaters Lane, Alexandria VA 22314 Phone #: 703-683-4877

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

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

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

Sponsor (full name): With Honor Fund

Address: PO Box 1843. Alexandria, VA 22313 Phone #: not listed; www.withhonor.org

Contact person (if different from Agency contact):

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

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

### EXHIBIT J

# AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Station and Location:	Date:
KUTVI Splingfield, mo	9-7-18
<sub>I,</sub> Red Eagle Media Group	
do hereby request station time concerning the following issue	HO:
	ue.
National Rifle Association 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
--

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

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

Does the programming (in whole or in part) communicate "a message relating to any political matter of national importance?"  ☐ Yes ☐ No
For programming that "communicates a message relating to any political matter of national importance," list the name of the legally qualified candidate(s) the programming refers to, the offices being sought, the date(s) of the election(s) and/or the issue to which the communication refers (if applicable):
Missouri General Election US Senate
I represent that the payment for the above described broadcast time has been furnished by (name and address):
11250 Waples Mill Road Fairfax, VA 22030
and you are authorized to announce the time as paid for by such person or entity (hereinafter referred to as the "sponsor").
List the chief executive officers or members of the executive committee or the board of directors below (or attach separately):
Robert G. Owens - Treasurer
For programming that "communicates a message relating to any political matter of national importance," attach Agreed Upon Schedule (Page 5)

### 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.

liability, including	reasonable att	y and hold harmless the station orney's fees, that may ensue fro	m the broadcast of the
above-requested	advertisement repare a scrip	(s). For the above-stated broat, transcript, or tape, which will bre the time of the scheduled l	dcast(s), the sponsor
09/6/18	E SIGNED E	BY ISSUE ADVERTISER (S — Levrel l	PONSOR)
Date		Signature	Contact Phone Number
_	TO BE SIGNE	D BY STATION REPRESENTA	TIVE
Accep	oted	☐ Accepted in Part	☐ Rejected
Vatalia No Signatur	re )	Natalie Mary	<u>Nesm</u>

### EXHIBIT K

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

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

Request was:	X Accepted	O Rejected
Check one:	<b>X</b> Original Form	O Supplement to Form (Date:)
	3 ase request: 9/19/18 tation employee: Mike	Wang
Contact person	Eagle Media Group n: Kristy Kovatch Slaters Lane, Alexandr 872-1155	ia, VA 22314
	of national importance e, gun rights, supreme	referenced in the spot covered by this form (if none, state "None"): court
	ates referenced and the he spot (if none, state	e office that that candidate is seeking—whether or not the office is "None"):
Claire McCask	<mark>xill, Josh Hawley, sena</mark>	<mark>te</mark>
List every Fed	eral election referenced	d in the spot (if none, state "None"): senate
	name): National Rifle A	Association-Political Victory Fund

Address: 11250 Waples Mill Road, Fairfax, VA 22030

Phone #: 800-672-3888; https://contact.nra.org/contact-us.aspx

Contact person (if different from Agency contact):

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

### EXHIBIT L

#### **ORDER**

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

#### Bill Plan

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

**PLC** 

SPL

Revenue Code 2:

Revenue Code 3:

#### **Totals**

Unit Code:

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

General

#### **Account Executives**

Account Executive	Executive Sales Office Sales Region		Start Date / End Date	Order %
Ben Stecker			Start Of Order - End Of Order	100%

Ln Ch St	art End	Inventory Code	Break	Start/End	Time Days	Len Spot	s Ra	te Pri	Rtg Type	Spots	Amount
N 1 KCTV 10/	29/18 10/29/18	News @ 5am	CM	5a-6a	1	:30	1 \$200	0.00 PMT	0.00 NM	1	\$200.00
		More in the Morning									
Start Da	te End Date	Weekdays Spo	ts/Week	Rate	Rating						
Week: 10/29/1	8 11/04/18	1	1	\$200.00	0.00						
N 2 KCTV 10/	24/18 10/24/18		CM	9-10am	1	:30	1 \$250	0.00 PMT	0.00 NM	1	\$250.00
		M-F 9-10am									
Start Da	te End Date	Weekdays Spo	ts/Week	Rate	Rating						
Week: 10/22/1	8 10/28/18	1	1	\$250.00	0.00						
N 3 KCTV 10/	25/18 10/25/18	Better KC/Better TV	CM	9-10am	1	:30	1 \$250	0.00 PMT	0.00 NM	1	\$250.00
		M-F 9-10am									
Start Da			ts/Week	Rate	Rating						
Week: 10/22/1	8 10/28/18	1	1	\$250.00	0.00						
N 4 KCTV 10/	26/18 10/26/18		CM	9-10am	1	:30	1 \$250	0.00 PMT	0.00 NM	1	\$250.00
		M-F 9-10am									
Start Da	te End Date		ts/Week	Rate	Rating						
Week: 10/22/1	8 10/28/18	1	1	\$250.00	0.00						
N 5 KCTV 10/	29/18 10/29/18	KCTV5 News 4pm	CM	4-5pm	1	:30	1 \$450	0.00 PMT	0.00 NM	1	\$450.00
		News @ 4pm									
Start Da	te End Date	Weekdays Spo	ts/Week	Rate	Rating						
Week: 10/29/1	8 11/04/18	1	1	\$450.00	0.00						

Print Date: 08/15/18 15:13:06 Page 2 of 5

Order / Rev: 897523 Advertiser: Josh Hawley For Senate

Alt Order #: 09195622 Product Desc: HAWLEY FOR SENATE Kansas City

Ln Ch	Start	End	Inventory Code	Break	Start/End T	ime Day	s	Len Spo	ots	Rate Pri	Rtg Type	Spots	Amount
N 6 KCTV	10/23/1	8 10/23/18	•	СМ	4-5pm	- 1		:30	1	\$450.00 PMT	0.00 NM	1	\$450.00
Sta	rt Date	End Date	News @ 4pm Weekdays Spots	/Week	Rate	Rating							
Week: 10/2	22/18	10/28/18	-1	1	\$450.00	0.00							
N 7 KCTV	10/24/1	8 10/24/18	News @ 4pm	CM	4-5pm	1		:30	1	\$450.00 PMT	0.00 NM	1	\$450.00
Sta Week: 10/2	rt Date 22/18	End Date 10/28/18	Weekdays Spots	Week 1	Rate \$450.00	Rating 0.00							
N 8 KCTV	10/25/1	8 10/25/18	KCTV5 News 4pm News @ 4pm	СМ	4-5pm	1-		:30	1	\$450.00 PMT	0.00 NM	1	\$450.00
Sta Week: 10/2	rt Date 22/18	End Date 10/28/18	Weekdays Spots	Week 1	Rate \$450.00	Rating 0.00							
N 9 KCTV	10/26/1	8 10/26/18	KCTV5 News 4pm News @ 4pm	СМ	4-5pm	1	1	:30	1	\$450.00 PMT	0.00 NM	1	\$450.00
Sta Week: 10/2	rt Date 22/18	End Date 10/28/18	Weekdays Spots	Week 1	<u>Rate</u> \$450.00	Rating 0.00							
N10 KCTV	10/29/1	8 10/29/18	KCTV5 News 5pm News @ 5pm	СМ	5-530pm	1		:30	1	\$550.00 PMT	0.00 NM	1	\$550.00
Star Week: 10/2	rt Date 29/18	End Date 11/04/18	Weekdays Spots	Week 1	<u>Rate</u> \$550.00	Rating 0.00							
N11 KCTV	10/23/1	8 10/23/18	KCTV5 News 5pm News @ 5pm	СМ	5-530pm	- 1		:30	1	\$550.00 PMT	0.00 NM	1	\$550.00
Star Week: 10/2	rt Date 22/18	End Date 10/28/18	Weekdays Spots	Week 1	Rate \$550.00	Rating 0.00							
N12 KCTV	10/23/1	8 10/23/18	News @ 5am More in the Morning	СМ	5a-6a	- 1		:30	1	\$200.00 PMT	0.00 NM	1	\$200.00
Sta	rt Date	End Date	· ·	/Week	Rate	Rating							
Week: 10/2		10/28/18	-1	1	\$200.00	0.00				Ф550 00 DMT	0.00 NA		<b>#</b> 550.00
N13 KCTV	10/24/1	8 10/24/18	KCTV5 News 5pm News @ 5pm	CM	5-530pm	1		:30	1	\$550.00 PMT	0.00 NM	1	\$550.00
Star Week: 10/2	rt Date 22/18	End Date 10/28/18	Weekdays Spots	Week 1	Rate \$550.00	Rating 0.00							
N14 KCTV	10/25/1	8 10/25/18	KCTV5 News 5pm News @ 5pm	СМ	5-530pm	1-		:30	1	\$550.00 PMT	0.00 NM	1	\$550.00
Sta Week: 10/	rt Date	End Date 10/28/18	•	Week 1	Rate \$550.00	Rating 0.00							
N15 KCTV		8 10/26/18	KCTV5 News 5pm News @ 5pm	CM	5-530pm	1	1	:30	1	\$550.00 PMT	0.00 NM	1	\$550.00
<u>Sta</u> Week: 10/	rt Date 22/18	End Date 10/28/18	•	Week 1	Rate \$550.00	Rating 0.00							
N16 KCTV			CBS Evening News M-F		530-6pm	1		:30	1	\$700.00 PMT	0.00 NM	1	\$700.00
Sta Week: 10/2	rt Date 29/18	End Date 11/04/18	_	Week 1	Rate \$700.00	Rating 0.00							
N17 KCTV			CBS Evening News M-F CBS Evening News	СМ	530-6pm	- 1		:30	1	\$700.00 PMT	0.00 NM	1	\$700.00
Sta Week: 10/2	rt Date	End Date 10/28/18	•	Week 1	Rate \$700.00	Rating 0.00							
N18 KCTV			CBS Evening News M-F CBS Evening News		530-6pm	1		:30	1	\$700.00 PMT	0.00 NM	1	\$700.00
Sta Week: 10/2	rt Date	End Date 10/28/18	=	/Week 1	Rate \$700.00	Rating 0.00							
N19 KCTV			CBS Evening News M-F CBS Evening News		530-6pm	1-		:30	1	\$700.00 PMT	0.00 NM	1	\$700.00
	rt Date	End Date	Weekdays Spots	/Week	Rate	Rating							
Week: 10/2		10/28/18	1	1 CM	\$700.00 530-6pm	0.00	1	:30	1	\$700.00 PMT	0.00 NM	4	\$700.00
INZU NCIV	10/20/1	0 10/20/18	CBS Evening News M-F CBS Evening News	CIVI	ooo-opiii	]	1	.30	'	φ <i>τ</i> υυ.υυ ΡΙΝΙ Ι	U.UU INIVI	1	φ/00.00
Sta	rt Date	End Date	Weekdays Spots	/Week	Rate	Rating							

Print Date: 08/15/18 15:13:06 Page 3 of 5

Order / Rev: 897523 Advertiser: Josh Hawley For Senate

Alt Order #: 09195622 Product Desc: HAWLEY FOR SENATE Kansas City

Ln Ch	Start	End	Inventory Code	Break	Start/End	Time Days	Len	Spots	Rate Pri	Rtg Type	Spots	Amount
St Week: 10	tart Date	End Date 10/28/18	<u>Weekdays</u> 1	Spots/Week	Rate \$700.00	Rating 0.00						
N21 KCTV			KCTV5 News 6pn News @ 6pm		6-630pm	1	- :30	1	\$700.00 PMT	0.00 NM	1	\$700.00
<u>Si</u> Week: 10	o/29/18	End Date 11/04/18	Weekdays 1	Spots/Week 1	Rate \$700.00	Rating 0.00						
N22 KCTV	/ 10/23/1	8 10/23/18	KCTV5 News 6pm News @ 6pm	n CM	6-630pm	- 1	- :30	1	\$700.00 PMT	0.00 NM	1	\$700.00
<u>Si</u> Week: 10	<u>D/22/18</u>	End Date 10/28/18	<u>Weekdays</u> - 1	Spots/Week 1	Rate \$700.00	Rating 0.00					<u> </u>	
N23 KCTV	/ 10/24/1	8 10/24/18	News @ 5am More in the Morn	CM ing	5a-6a	1	- :30	1	\$200.00 PMT	0.00 NM	1	\$200.00
Week: 10		End Date 10/28/18	Weekdays 1	Spots/Week 1	Rate \$200.00	Rating 0.00						
		8 10/24/18	KCTV5 News 6pn News @ 6pm		6-630pm	1	- :30	1	\$700.00 PMT	0.00 NM	1	\$700.00
Week: 10		End Date 10/28/18	Weekdays 1	Spots/Week 1	\$700.00	Rating 0.00	-20		Ф700 00 DM	- 0.00 NM		¢700.00
N25 KCT\	10/25/1	8 10/25/18 End Date	KCTV5 News 6pn News @ 6pm Weekdays	n CM Spots/Week	6-630pm	Rating	- :30	1	\$700.00 PMT	0.00 NM	1	\$700.00
Week: 10	0/22/18	10/28/18	1 KCTV5 News 6pn	1	\$700.00 6-630pm	0.00 1-	- :30	1	\$700.00 PMT	- 0.00 NM	1	\$700.00
	tart Date	End Date	News @ 6pm Weekdays	Spots/Week	Rate	Rating	.50	,	ψ700.001 W1	0.00 14101		Ψ100.00
Week: 10	0/22/18	10/28/18 8 10/27/18	KCTV5 SA News	1	\$700.00 6-7pm	0.00	- :30	1	\$500.00 PMT	0.00 NM	1	\$500.00
	tart Date	End Date	KCTV5 SA News Weekdays	•	Rate	Rating			***************************************			*******
Week: 10	0/22/18	10/28/18	1-	1	\$500.00	0.00			A			<b>^-</b>
		8 10/28/18	KCTV5 SU News KCTV5 SU News	530p	530-6p	Detien	1 :30	1	\$500.00 PMT	0.00 NM	1	\$500.00
Week: 10	o/22/18	End Date 10/28/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$500.00	Rating 0.00						
N29 KCT\	/ 10/29/1	8 10/29/18	M-F 630-7pm M-F 630-7pm	СМ	630-7pm	1	- :30	1	\$900.00 PMT	0.00 NM	1	\$900.00
<u>Si</u> Week: 10	art Date 0/29/18	End Date 11/04/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$900.00	Rating 0.00						
			M-F 630-7pm M-F 630-7pm	СМ	630-7pm	- 1	- :30	1	\$900.00 PMT	0.00 NM	1	\$900.00
<u>Si</u> Week: 10	<u>D/22/18</u>	End Date 10/28/18	Weekdays - 1	Spots/Week 1	Rate \$900.00	Rating 0.00						
		8 10/24/18	M-F 630-7pm M-F 630-7pm	СМ	630-7pm	1	- :30	1	\$900.00 PMT	0.00 NM	1	\$900.00
Week: 10		End Date 10/28/18	Weekdays 1	Spots/Week 1	Rate \$900.00	Rating 0.00						
		8 10/25/18	M-F 630-7pm M-F 630-7pm	CM	630-7pm	1	- :30	1	\$900.00 PMT	0.00 NM	1	\$900.00
<u>Si</u> Week: 10	o/22/18	End Date 10/28/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$900.00	Rating 0.00						
N33 KCT\	/ 10/26/1	8 10/26/18	M-F 630-7pm M-F 630-7pm	СМ	630-7pm	1	- :30	1	\$900.00 PMT	0.00 NM	1	\$900.00
Week: 10		End Date 10/28/18	Weekdays 1	Spots/Week 1	Rate \$900.00	Rating 0.00						
N34 KCTV	/ 10/25/1	8 10/25/18	News @ 5am More in the Morni	CM ing	5a-6a	1	- :30	1	\$200.00 PMT	0.00 NM	1	\$200.00
<u>St</u> Week: 10	o/22/18	End Date 10/28/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$200.00	Rating 0.00						
N35 KCTV				СМ	7-8pm		:30	1	\$1,800.00 PMT	0.00 NM	1	\$1,800.00

Print Date: 08/15/18 15:13:06 Page 4 of 5

Order / Rev: 897523 Advertiser: Josh Hawley For Senate

Alt Order #: 09195622 Product Desc: HAWLEY FOR SENATE Kansas City

Ln Ch	Start	End	Inventory Code	Break	Start/End T	ime Days	Len Sp	ots	Rate Pri	Rtg Type	Spots	Amount
			Mon 7-8pm Mon 7-8pm			1						
	rt Date	End Date	Weekdays	Spots/Week	Rate	Rating						
Week: 10/		11/04/18	1 Wed 7-8pm	CM	* ,	0.00	:30	1	\$3,800.00 PMT	0.00 NIM	1	\$3,800.00
NSO KCIV	10/24/1	0 10/24/10	Wed 7-8pm	Civi	7-8pm	1	.30	'	ф3,600.00 FIVI I	U.UU INIVI	'	φ3,600.00
Sta Week: 10/	rt Date 22/18	End Date 10/28/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$3,800.00	Rating 0.00						
N37 KCTV	10/24/1	8 10/24/18	Wed 8-9pm Wed 8-9pm	CM	8-9pm	1	:30	1	\$2,600.00 PMT	0.00 NM	1	\$2,600.00
Sta Week: 10/	rt Date 22/18	End Date 10/28/18	Weekdays	Spots/Week 1	Rate \$2,600.00	Rating 0.00						
N38 KCTV	10/24/1	8 10/24/18	Wed 9-10pm Wed 9-10pm	СМ	9-10pm	1	:30	1	\$2,400.00 PMT	0.00 NM	1	\$2,400.00
Sta Week: 10/	rt Date 22/18	End Date 10/28/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$2,400.00	Rating 0.00						
N39 KCTV	10/25/1	8 10/25/18	Thu 8-9pm Thu 8-9pm	СМ	8-9pm	1	:30	1	\$3,200.00 PMT	0.00 NM	1	\$3,200.00
Sta Week: 10/	rt Date 22/18	End Date 10/28/18	Weekdays	Spots/Week 1	Rate \$3,200.00	Rating 0.00						
N40 KCTV	10/26/1	8 10/26/18	Fri 8-9pm Fri 8-9pm	СМ	8-9pm	1	:30	1	\$1,800.00 PMT	0.00 NM	1	\$1,800.00
Sta Week: 10/	rt Date 22/18	End Date 10/28/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$1,800.00	Rating 0.00						
N41 KCTV	10/28/1	8 10/28/18	Sun 6-7pm Sun 6-7pm	СМ	6-7pm	1	:30	1	\$6,400.00 PMT	0.00 NM	1	\$6,400.00
<u>Sta</u> Week: 10/	rt Date 22/18	End Date 10/28/18	Weekdays 1	Spots/Week 1	Rate \$6,400.00	Rating 0.00						
N42 KCTV	10/28/1	8 10/28/18	Sun 8-9pm Sun 8-9pm	СМ	Sun 8-9pm	1	:30	1	\$2,200.00 PMT	0.00 NM	1	\$2,200.00
Sta Week: 10/	rt Date 22/18	End Date 10/28/18	Weekdays 1	Spots/Week 1	Rate \$2,200.00	Rating 0.00						
N43 KCTV		8 10/29/18	News @ 10pm KCTV5 News @	CM 10P	10-1035pm	1	:30	1	\$650.00 PMT	0.00 NM	1	\$650.00
<u>Sta</u> Week: 10/	rt Date 29/18	End Date 11/04/18	Weekdays 1	Spots/Week 1	Rate \$650.00	Rating 0.00						
N44 KCTV	10/23/1	8 10/23/18	News @ 10pm KCTV5 News @	CM 10P	10-1035pm	- 1	:30	1	\$650.00 PMT	0.00 NM	1	\$650.00
Sta Week: 10/	rt Date 22/18	End Date 10/28/18	<u>Weekdays</u> - 1	Spots/Week 1	Rate \$650.00	Rating 0.00						
N45 KCTV		8 10/26/18	News @ 5am More in the Morn	CM	5a-6a	1	:30	1	\$200.00 PMT	0.00 NM	1	\$200.00
Sta Week: 10/	rt Date 22/18	End Date 10/28/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$200.00	Rating 0.00						
N46 KCTV	10/24/1	8 10/24/18	News @ 10pm KCTV5 News @	CM 10P	10-1035pm	1	:30	1	\$650.00 PMT	0.00 NM	1	\$650.00
Sta Week: 10/	rt Date 22/18	End Date 10/28/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$650.00	Rating 0.00						
N47 KCTV	10/25/1	8 10/25/18	News @ 10pm KCTV5 News @	CM 10P	10-1035pm	1	:30	1	\$650.00 PMT	0.00 NM	1	\$650.00
<u>Sta</u> Week: 10/	rt Date 22/18	End Date 10/28/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$650.00	Rating 0.00						
N48 KCTV			News @ 10pm KCTV5 News @	CM 10P	10-1035pm	1	:30	1	\$650.00 PMT	0.00 NM	1	\$650.00
Sta Week: 10/	rt Date 22/18	End Date 10/28/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$650.00	Rating 0.00						
N49 KCTV			Sat News @ 10pr KCTV5 News @		10-1035pm	1-	:30	1	\$650.00 PMT	0.00 NM	1	\$650.00
Sta	rt Date	End Date	Weekdays	Spots/Week	Rate	Rating						

Print Date: 08/15/18 15:13:06 Page 5 of 5

Order / Rev: 897523 Advertiser: Josh Hawley For Senate

Alt Order #: 09195622 Product Desc: HAWLEY FOR SENATE Kansas City

Ln Ch	Start	End	Inventory Code	Break	Start/End T	ime Days	Len S	Spots	Rate Pri	Rtg Type	Spots	Amount
Sta Week: 10/	rt Date /22/18	End Date 10/28/18	Weekdays 1-	Spots/Week 1	<u>Rate</u> \$650.00	Rating 0.00						
N50 KCTV	10/28/1	8 10/28/18	Sun News @ 10p KCTV5 News @		10-1035pm	1	:30	1	\$650.00 PMT	0.00 NM	1	\$650.00
Sta Week: 10/	art Date /22/18	End Date 10/28/18	Weekdays	Spots/Week	Rate \$650.00	Rating 0.00						
			M-F 1035-1135P M-F 1035-1135P	СМ	1035-1135P	1	:30	1	\$460.00 PMT	0.00 NM	1	\$460.00
Sta Week: 10/	rt Date /29/18	End Date 11/04/18	Weekdays	Spots/Week	Rate \$460.00	Rating 0.00						
			M-F 1035-1135P M-F 1035-1135P	CM	1035-1135P	- 1	:30	1	\$460.00 PMT	0.00 NM	1	\$460.00
Sta Week: 10/	art Date /22/18	End Date 10/28/18	Weekdays - 1	Spots/Week	<u>Rate</u> \$460.00	Rating 0.00						
			M-F 1035-1135P 10:35 PM-11:35	СМ	1035-1135P (10:35 PM-11	1	:30	1	\$460.00 PMT	0.00 NM	1	\$460.00
Sta Week: 10/	rt Date /22/18	End Date 10/28/18	Weekdays 1	Spots/Week	Rate \$460.00	Rating 0.00						
			M-F 1035-1135P M-F 1035-1135P	СМ	1035-1135P	1	:30	1	\$460.00 PMT	0.00 NM	1	\$460.00
<u>Sta</u> Week: 10/	rt Date /22/18	End Date 10/28/18	Weekdays 1	Spots/Week	Rate \$460.00	Rating 0.00					İ	
N55 KCTV			1035p-11p 10:35 PM-11:00	CM PM	10:35p-11p (10:35 PM-11	1	:30	1	\$600.00 PMT	0.00 NM	1	\$600.00
Sta Week: 10/	art Date /22/18	End Date 10/28/18	Weekdays	Spots/Week 1	Rate \$600.00	Rating 0.00						
N56 KCTV	10/27/1	8 10/27/18	KCTV5 Local Nev KCTV5 Local Ne		8-10a	1-	:30	1	\$250.00 PMT	0.00 NM	1	\$250.00
Sta Week: 10/	rt Date /22/18	End Date 10/28/18	Weekdays 1-	Spots/Week 1	Rate \$250.00	Rating 0.00						
N57 KCTV	10/27/1	8 10/27/18	M-SU Prime Rota M-Su Prime Rota		M-Sa 7-10pr	n/Su 61-	:30	1	\$800.00 PMT	0.00 NM	1	\$800.00
Sta Week: 10/	rt Date /22/18	End Date 10/28/18	Weekdays 1-	Spots/Week 1	Rate \$800.00	Rating 0.00						
N58 KCTV	10/28/1	8 10/28/18	NFL*Chiefs Reg \$ 12:00 PM-3:00 P		Various (12:00 PM-3:	1 00 PM)	:30	1\$	32,000.00 PMT	0.00 NM	1	\$32,000.00
Sta Week: 10/	rt Date /22/18	End Date 10/28/18	Weekdays 1	Spots/Week	<u>Rate</u> \$32,000.00	Rating 0.00						
N59 KCTV	10/28/1	8 10/28/18	Sun AM News Sun AM News	СМ	930-1130am	1	:30	1	\$300.00 PMT	0.00 NM	1	\$300.00
Sta Week: 10/	rt Date /22/18	End Date 10/28/18	Weekdays 1	Spots/Week 1	Rate \$300.00	Rating 0.00						
N60 KCTV	10/29/1	8 10/29/18	Better KC/Better M-F 9-10am	TV CM	9-10am	1	:30	1	\$250.00 PMT	0.00 NM	1	\$250.00
Sta Week: 10/	rt Date /29/18	End Date 11/04/18	Weekdays 1	Spots/Week 1	Rate \$250.00	Rating 0.00						
N61 KCTV	10/23/1	8 10/23/18	Better KC/Better M-F 9-10am	TV CM	9-10am	- 1	:30	1	\$250.00 PMT	0.00 NM	1	\$250.00
Sta Week: 10/	art Date /22/18	End Date 10/28/18	<u>Weekdays</u> - 1	Spots/Week 1	<u>Rate</u> \$250.00	Rating 0.00						
										Totala		¢94 200 00

## EXHIBIT M



 $\mathsf{KECl}\text{+}\mathsf{KCFW}\,\mathsf{Combo}\,\mathsf{KECl}\text{+}\mathsf{KCF}^{\mathsf{M}^{\mathsf{dvertiser}}}$ 340 West Main St Missoula, MT 59802

Red Eagle Media Group 815 Slaters Ln Alexandria, VA 22314

#### Contract #

Schedule Dates

Agency Product Brand

Salesperson Sales Office

Buyer Name Phone/Fax

CPE

Account Types Billing Type Comments

#### 3327500

05/03/18-05/09/18

America First Action (122842)

Red Eagle Media Group (15829) POLITICAL ISSUE (ns) (1187) ISSUE ADVERTISING (218560)

Katz/DC, Washington DC (4022)

Katz, Washington DC Media Med, Eagle

622/1149/9355

National/Political Issue Agency BRD

Standard America First Separation: 30 Date Entered Last Modified

Entered By

05/02/18

05/02/18 Leslie Stoll-Oneill

No CO+OP

ECR26004938

Headline # Demo

Order Type Normal

Package Deal

Commission % 15.00

Commission \$5,148.75

Net Total Sales Tax \$29,176.25

KECI+KCFW Combo (KECI+KCFW) By Broadcast Month Spots <u>Rate</u> 93 May. 2018 \$34,325.00 Grand Total: 93 \$34,325.00

Line	Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPW	Мо	Tu	We	e Th	Fr	Sa	Su	Spots	Rate	Total	Station	Comments	Entered
1.0 Nc	ormal Line / SPOT	05/05/18-05/05/18	1	:30	10A- 5P (MST)	3			1			X		3	\$125.00	\$375,00	KECI+KCFW Combo (KECI+KCFW)	NHL Playoffs Day	5/2/18
2.0 No	ormal Line / SPOT	05/06/18-05/06/18	1	:30	10A- SP (MST)	3							Х	3	\$125.00	\$375.00	KECI+KCFW Combo (KECI+KCFW)	NHL Playoffs Day	5/2/18
3.0 No	ormal Line / SPOT	05/03/18-05/03/18	1	:30	2:30P- 3P (MST)	1			Ì	Х				1	\$160.00	\$160.00	KECI+KCFW Combo (KECI+KCFW)	JUDGE JUDY B	5/2/18
4.0 Nc	ormal Line / SPOT	05/04/18-05/04/18	1	:30	2:30P- 3P (MST)	1		1	ĺ		x			1	\$160,00	\$160.00	KECI+KCFW Combo (KECI+KCFW)	JUDGE JUDY B	5/2/18
		05/07/18-05/07/18	1	:30	2:30P+3P (MST)	1	x	1	Ī	1			-	1	\$160,00	\$160.00	KECI+KCFW Combo (KECI+KCFW)	JUDGE JUDY B	5/2/18
		05/08/18-05/08/18	1	:30	2:30P- 3P (MST)	1		Х	-					1	\$160.00	\$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY B	5/2/18
<del></del>	<del></del>	05/09/18-05/09/18	1	:30	2:30P- 3P (MST)	1			x					1	\$160,00	\$160.00	KECI+KCFW Combo (KECI+KCFW	JUDGE JUDY B	5/2/18
<del></del>	ormal Line / SPOT	05/03/18-05/03/18	1	:30	2P- 2:30P (MST)	1				X				1	\$160.00	\$160.00	KECI+KCFW Combo (KECI+KCFW)	JUDGE JUDY	5/2/18
	ormal Line / SPOT	05/04/18-05/04/18	1	:30	2P- 2;30P (MST)	1		ĺ		1	x :		İ	1	\$160.00	\$160.00	KECI+KCFW Combo (KECI+KCFW)	JUDGE JUDY	5/2/18
10.0 No	ormal Line / SPOT	05/07/18-05/07/18	1	:30	2P- 2:30P (MST)	1	X	Π		1				1	\$160.00	\$160.00	KECI+KCFW Combo (KECI+KCFW)	JUDGE JUDY	5/2/18
- 1	· <del></del>	05/08/18-05/08/18	1	:30	2P- 2:30P (MST)	1		x	ŧ				1	1	\$160.00	\$160.00	KECI+KCFW Combo (KECI+KCFW)	JUDGE JUDY	5/2/18
	ormal Line / SPOT	05/09/18-05/09/18	i	:30	2P- 2:30P (MST)	1			X		1	į		1	\$160.00	\$160.00	KECI+KCFW Combo (KECI+KCFW)	JUDGE JUDY	5/2/18
	ormal Line / Hockey	05/05/18-05/05/18	2	:30	5P- 8P (MST)	2			į			Х	i	2	\$175.00	\$350.00	KECI+KCFW Combo (KECI+KCFW)	NHL Playoffs Prime 7e/6c	5/2/18
					CON														

13.0 Normal Line / Hockey	05/05/18-05/05/18	2 :30 59-89 (	MSI)	1 1 2 \$173,00	\$330.00 RECITION W COMBO (RECI	TREE WITH TET BY ONS THING 7 C/OC 3/2/18
			CONFIRMATION	CONTRACT		
Accepted-Agency/Advertiser:		Date:	Accepted-Station:	Date:	Comments:	
					<del>. ' </del>	

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.

				1
--	--	--	--	---

Red Eagle Media Group

Alexandria, VA 22314

815 Slaters Ln

KECI+KCFW Combo KECI+KCFWdvertiser 340 West Main St Agency

Missoula, MT 59802

Product Brand Salesperson

Contract #

Schedule Dates

Sales Office **Buyer Name** Phone/Fax

CPE

Account Types Billing Type

Date:

Comments

3327500

05/03/18-05/09/18 America First Action (122842) Red Eagle Media Group (15829) POLITICAL ISSUE (ns) (1187) ISSUE ADVERTISING (218560) Katz/DC, Washington DC (4022)

Katz Washington DC Media Med, Eagle

622/1149/9355 National/Political Issue Agency BRD

Standard America First Separation: 30

Date Entered 05/02/18 Last Modified

05/02/18 Leslle Stoll-Oneill

CO-OP No

ECR26004938 Headline#

Demo Order Type

Entered By

Normal

\$29,176.25

Comments:

Date:

Package Deal Commission % 15.00

Commission \$5,148.75

Net Total

Sales Tax

By Broadcast Month	Spots	<u>Rate</u>
May. 2018	93	\$34,325.00
Grand Total:	93	\$34,325.00

Line	Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPW	Мо	Tu	We	Th I	Fr Sa	Su	1 5	Spots	Rate	Total	Station	Comments	Entered
14.0	Normal Line / SPOT	05/05/18-05/05/18	2	:30	7A- 8A (MST)	1					X	Ì		1	\$200.00	\$200.00	KECI+KCFW Combo (KECI+KCFW)	SATURDAY TODAY/AVG. ALL WKS	5/2/18
15.0	Normal Line / SPOT	05/03/18-05/03/18	2	:30	4P- 5P (MST)	1				х		1	Ι	1	\$220.00	\$220,00	KECI+KCFW Combo (KECI+KCFW	ELLEN	5/2/18
16.0	Normal Line / SPOT	05/04/18-05/04/18	2	:30	4P- 5P (MST)	1					x l			1	\$220.00	\$220,00	KECI+KCFW Combo (KECI+KCFW	ELLEN	5/2/18
17.0	Normal Line / SPOT	05/07/18-05/07/18	2	:30	4P- 5P (MST)	1	X					-		1	\$220.00	\$220.00	KECI+KCFW Combo (KECI+KCFW)	ELLEN	5/2/18
	Normal Line / SPOT	05/08/18-05/08/18	2	:30	4P- 5P (MST)	1		Ìχ	1	1		4	T	1	\$220.00	\$220.00	KECI+KCFW Combo (KECI+KCFW	ELLEN	5/2/18
19.0	Normal Line / SPOT	05/09/18-05/09/18	2	:30	4P- 5P (MST)	1			x			ļ	T	1	\$220.00	\$220.00	KECI+KCFW Combo (KECI+KCFW	ELLEN	5/2/18
	Normal Line / SPOT	05/05/18-05/05/18	2	:30	4:30P- 5:15P (MST)	1			1 1	T	X	ļ	T	1	\$275,00	\$275.00	KECI+KCFW Combo (KECI+KCFW	KENTUCKY DERBY	5/2/18
21.0	Normal Line / SPOT	05/06/18-05/06/18	2	:30	10:30P- 11P (MST)	1		İ		į		X	T	1	\$280.00	\$280.00	KECI+KCFW Combo (KECI+KCFW	FULL MEASURE	5/2/18
	Normal Line / SPOT	05/03/18-05/03/18	1	:30	10:35P- 11:35P (MST)	1				χ		ĺ	T	1	\$290.00	\$290,00	KECI+KCFW Combo (KECI+KCFW	TONITE SHW-NBC	5/2/18
	Normal Line / SPOT	05/04/18-05/04/18	1	:30	10:35P- 11:35P (MST)	1		İ	1 1		x	-	T	1	\$290.00	\$290.00	KECI+KCFW Combo (KECI+KCFW	TONITE SHW-NBC	5/2/18
	Normal Line / SPOT	05/07/18-05/07/18	1	:30	10:35P- 11:35P (MST)	1	х			-				1	\$290.00	\$290.00	KECI+KCFW Combo (KECI+KCFW	TONITE SHW-NBC	5/2/18
	Normal Line / SPOT	05/08/18-05/08/18	1	:30	10:35P- 11:35P (MST)	1		Х				Ī		1	\$290,00	\$290.00	KECI+KCFW Combo (KECI+KCFW	TONITE SHW-NBC	5/2/18
	Normal Line / SPOT	05/09/18-05/09/18	1	:30	10:35P- 11:35P (MST)	1			x	1		l	I	1	\$290,00	\$290,00	KECI+KCFW Combo (KECI+KCFW	TONITE SHW-NBC	5/2/18
			1_	<u> </u>	CON	FIF	Ţ ΚΜ	AT	101	V C	103	JΤ	Į.	AC	<u> </u>				

The parties intend for the Standard Advertiser Terms and Conditions ("Terms") located at... http://sbgi.net/7p=1224 ... to be part of their agreement, and the sale of advertising is expressly subject to said Terms.

Accepted-Station:

Accepted-Agency/Advertiser:

<b>/</b> (.=	A off	12

Red Eagle Media Group

Alexandria, VA 22314

815 Slaters Ln

KECI+KCFW Combo KECI+KCFWdvertiser 340 West Main St

Agency Missoula, MT 59802 Product Brand

> Salesperson Sales Office

Contract #

Schedule Dates

Buyer Name Phone/Fax CPE

Account Types Billing Type

Date:

Comments

3327500

05/03/18-05/09/18 America First Action (122842) Red Eagle Media Group (15829)

POLITICAL ISSUE (ns) (1187) ISSUE ADVERTISING (218560)

Katz/DC, Washington DC (4022) Katz Washington DC Media Med, Eagle

622/1149/9355

National/Political Issue Agency BRD

Standard America First Separation: 30 Date Entered Last Modified

Entered By

05/02/18

05/02/18 Leslie Stoll-Oneili

CO-OP No

ECR26004938

Headline # Demo

Order Type

Normal

Package Deal Commission %

15.00 \$5,148,75

Net Total

Date:

Comments:

\$29,176.25

Sales Tax

Commission

y Broadcast Month	Spots	<u>Rate</u>
1ay. 2018	93	\$34,325,00
rand Total:	93	\$34,325.00

Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPW	Мо	Tu	We	Th f	Fr S	a Su	Spots	Rate	Total	Station	Comments	Entere
27.0 Normal Line / SPOT	05/06/18-05/06/18	1	:30	9A- 10A (MST)	2		İ			ļ	X	2	\$290.00	\$580.00	KECI+KCFW Combo (KECI+KCFW)	MEET PRESS-SUN	5/2/18
28.0 Normal Line / News	05/03/18-05/03/18	1	:30	6:30A- 7A (MST)	1				хİ			1	\$290,00	\$290.00	KECI+KCFW Combo (KECI+KCFW)	MONTANA TODAY3	5/2/18
29.0 Normal Line / News	05/04/18-05/04/18	1	:30	6:30A-7A (MST)	1				1:	x l		1	\$290,00	\$290.00	KECI+KCFW Combo (KECI+KCFW)	MONTANA TODAY3	5/2/18
30.0 Normal Line / News	05/07/18-05/07/18	1	:30	6:30A-7A (MST)	1	х				1	ļ	1	\$290.00	\$290.00	KECI+KCFW Combo (KECI+KCFW)	MONTANA TODAY3	5/2/18
31.0 Normal Line / News	05/08/18-05/08/18	1	:30	6:30A-7A (MST)	1		Х			1		i	\$290.00	\$290.00	KECI+KCFW Combo (KECI+KCFW)	MONTANA TODAY3	5/2/18
32.0 Normal Line / News	05/09/18-05/09/18	1	:30	6:30A-7A (MST)	1			x		į		1	\$290.00	\$290.00	KECI+KCFW Combo (KECI+KCFW)	MONTANA TODAY3	5/2/18
33.0 Normal Line / News	05/05/18-05/05/18	1	:30	5P- 5:30P (MST)	1			1 1		1	x	1	\$300.00	\$300.00	KECI+KCFW Combo (KECI+KCFW)	NEWS AT 5 - SA	5/2/18
34.0 Normal Line / News	05/03/18-05/03/18	1	:30	8A- 9A (MST)	2			1	x l			2	\$340.00	\$680.00	KECI+KCFW Combo (KECI+KCFW)	TODAY SHW<	5/2/18
35.0 Normal Line / News	05/04/18-05/04/18	1	:30	8A- 9A (MST)	2					x	1	2	\$340.00	\$680.00	KECI+KCFW Combo (KECI+KCFW)	TODAY SHW<	5/2/18
36.0 Normal Line / News	05/07/18-05/07/18	1	:30	8A- 9A (MST)	2	Х				-		2	\$340.00	\$680.00	KECI+KCFW Combo (KECI+KCFW)	TODAY SHW<	5/2/18
37.0 Normal Line / News	05/08/18-05/08/18	1	:30	8A- 9A (MST)	2		Х			I		2	\$340.00	\$680.00	KECI+KCFW Combo (KECI+KCFW)	TODAY SHW<	5/2/18
38,0 Normal Line / News	05/09/18-05/09/18	1	:30	8A- 9A (MST)	2			x		Ţ		2	\$340.00	\$680.00	KECI+KCFW Combo (KECI+KCFW)	TODAY SHW<	5/2/18
39.0 Normal Line / News	05/03/18-05/03/18	1	:30	7A- 8A (MST)	2			1	х	ļ		2	\$340.00	\$680.00	KECI+KCFW Combo (KECI+KCFW)	TODAY SHW<	5/2/18
40.0 Normal Line / News	05/04/18-05/04/18	1	:30	7A- 8A (MST)	2					x E	1	2	\$340.00	\$680.00	KECI+KCFW Combo (KECI+KCFW)	TODAY SHW<	5/2/18

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

Accepted-Station:

Accepted-Agency/Advertiser:

K	Ą	M) 12	, ,
Ŋ	Ą		

KECI+KCFW Combo KECI+KCFW dvertiser 340 West Main St

Agency Missoula, MT 59802 Product Brand

Red Eagle Media Group 815 Slaters Ln Alexandria, VA 22314

#### Contract # 3327500

Schedule Dates

Salesperson

Sales Office

Buyer Name

Account Types

05/03/18-05/09/18

America First Action (122842) Red Eagle Media Group (15829)

POLITICAL ISSUE (ns) (1187) ISSUE ADVERTISING (218560)

Katz/DC, Washington DC (4022)

Katz Washington DC Media Med,Eagle

Separation: 30

Phone/Fax

CPE 622/1149/9355 National/Political Issue Agency BRD

Billing Type Standard Comments America First Date Entered 05/02/18 **Last Modified** 05/02/18

Leslie Stoll-Oneill Entered By

CO-OP No

ECR26004938 Headline #

Demo

Order Type Normal Package Deal

Commission % 15.00

Commission \$5,148.75

\$29,176.25

Net Total

Sales Tax

KECI+KCFW Comb	o (KECI+i	(CFW)
By Broadcast Month		Rate
May. 2018	93	\$34,325.00
Grand Total:	93	\$34,325.00

Line	Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPW	Мо	Tu	We Th	Fr	Sa	Su	Spots	Rate	Total	Station	Comments	Entered
41.0	Normal Line / News	05/07/18-05/07/18	1	:30	7A- 8A (MST)	2	X		.				2	\$340,00	\$680.00	KECI+KCFW Combo (KECI+KCFW)	TODAY SHW<	5/2/18
42.0	Normal Line / News	05/08/18-05/08/18	1	:30	7A- 8A (MST)	2	Γ	Х				-	2	\$340.00	\$680.00	KECI+KCFW Combo (KECI+KCFW)	TODAY SHW<	5/2/18
43.0	Normal Line / News	05/09/18-05/09/18	1	:30	7A- 8A (MST)	2			x				2	\$340.00	\$680.00	KECI+KCFW Combo (KECI+KCFW)	TODAY SHW<	5/2/18
44.0	Normal Line / SPOT	05/05/18-05/05/18	1	:30	9:30P-11P (MST)	1		1			Х		1	\$400.00	\$400.00	KECI+KCFW Combo (KECI+KCFW)	SAT NITE LIVE	5/2/18
45.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	7P- 8P (MST)	7 2				Х			2	\$400,00	\$800.00	KECI+KCFW Combo (KECI+KCFW)	BLINDSPOT	5/2/18
46.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	8P- 9P (MST)	2		1		Х			2	\$400.00	\$800.00	KECI+KCFW Combo (KECI+KCFW	TAKEN	5/2/18
47.0	Normal Line / News	05/05/18-05/05/18	1	:30	10P- 10:30P (MST)	1					х		1	\$410.00	\$410.00	KECI+KCFW Combo (KECI+KCFW)	SAT NITE LIVE	5/2/18
48.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	9P- 10P (MST)	2				X			2	\$440,00	\$880.00	KECI+KCFW Combo (KECI+KCFW)	DATELNE FR-NBC	5/2/18
49.0	Normal Line / News	05/03/18-05/03/18	1	:30	5P+ 5:30P (MST)	1		Ī	X				1	\$460.00	\$460.00	KECI+KCFW Combo (KECI+KCFW)	NEWS AT 5	5/2/18
50.0	Normal Line / News	05/04/18-05/04/18	1	:30	5P- 5:30P (MST)	1				X			1	\$460.00	\$460.00	KECI+KCFW Combo (KECI+KCFW)	NEWS AT 5	5/2/18
51.0	Normal Line / News	05/07/18-05/07/18	1	:30	5P- 5:30P (MST)	1	Х	-					1	\$460.00	\$460.00	KECI+KCFW Combo (KECI+KCFW)	NEWS AT 5	5/2/18
52.0	Normal Line / News	05/08/18-05/08/18	1	. :30	5P- 5:30P (MST)	1		х					1	\$460.00	\$460.00	KECI+KCFW Combo (KECI+KCFW)	NEWS AT 5	5/2/18
53.0	Normal Line / News	05/09/18-05/09/18	1	:30	5P- 5:30P (MST)	1		i	X				1	\$460,00	\$460.00	KECI+KCFW Combo (KECI+KCFW)	NEWS AT 5	5/2/18
54.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	8P- 9P (MST)	1			X				1	\$460.00	\$460,00	KECI+KCFW Combo (KECI+KCFW)	LAW AND ORDER	5/2/18

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

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



Red Eagle Media Group

Alexandria, VA 22314

815 Slaters Ln

 ${\sf KECI\text{+}KCFWCombo\ KECI\text{+}KCF} \text{\textit{M}}^{\textit{dvertiser}}$ 340 West Main St

Missoula, MT 59802

Agency Product Brand

> Salesperson Sales Office

Contract #

Schedule Dates

**Buyer Name** Phone/Fax CPE

Account Types Billing Type

Date:

Comments

3327500

05/03/18-05/09/18 America First Action (122842) Red Eagle Media Group (15829) POLITICAL ISSUE (ns) (1187) ISSUE ADVERTISING (218560) Katz/DC, Washington DC (4022)

Katz Washington DC Media Med, Eagle

1 622/1149/9355

National/Political Issue Agency BRD

Standard America First Separation: 30 Date Entered 05/02/18 Last Modified

05/02/18 Lesiie Stoll-Onell

CO-OP No

ECR26004938 Headline #

Demo

Entered By

Order Type Normal

Package Deal Commission %

15.00 Commission \$5,148.75

Net Total \$29,176.25

Date:

Comments:

Sales Tax

KECI+KCFW Comb By Broadcast Month		<u>Rate</u>
May. 2018	93	\$34,325.00
Grand Total:	93	\$34,325.00
races and the state of the		

Line	Line Type / Break Type (Ref #)	Dates	Sec	c Lengt	gth Run Times	SPW	Мо	Tu	We T	Th F	r S	ia Si	j s	Spots	Rate	Total	Station	Comments	Entered
	Normal Line / SPOT	05/06/18-05/06/18		1	:30 9P+ 10P (MST)	1		$\lceil \rceil$			-	x		i	\$500.00	\$500.00	KECI+KCFW Combo (KECI+KCFW	TIMELESS	5/2/18
	Normal Line / News	05/03/18-05/03/18	+		:30 6P- 6:30P (MST)	1				х			T	1	\$540.00	\$540.00	KECI+KCFW Combo (KECI+KCFW)	NEWS AT 6	5/2/18
	Normal Line / News	05/04/18-05/04/18	+	+	:30 6P- 6:30P (MST)	1				13	ΧĪ		$\top$	1	\$540.00	\$540.00	KECI+KCFW Combo (KECI+KCFW)	NEWS AT 6	5/2/18
	<del> </del>	05/07/18-05/07/18	+		:30 6P- 6:30P (MST)	$\top$	x			Ť	Ť	T	T	1	\$540.00	\$540.00	KECI+KCFW Combo (KECI+KCFW)	NEWS AT 6	5/2/18
	Normal Line / News		+	+	:30 6P- 6:30P (MST)	1	1	х		一	Ť	Ť	$\top$	1	\$540.00	\$540.00	KECI+KCFW Combo (KECI+KCFW)	NEWS AT 6	5/2/18
-	Normal Line / News	05/08/18-05/08/18	+	+	:30 6P- 6:30P (MST)	1	1	<del>-</del>	l x		-	十	$\top$	1	\$540.00	\$540.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 6	5/2/18
	Normal Line / News	05/09/18-05/09/18	+-'	-}	— <del> </del>		,†	-	101		<del>-</del>	-	+-	• 7	\$560.00	· · · · · · · · · · · · · · · · · · ·	KECI+KCFW Combo (KECI+KCFW)		5/2/18
61.0	Normal Line / SPOT	05/09/18-05/09/18	1-1	-	:30 7P- 8P (MST)		+-	<u>i                                     </u>	1 1	<del>,  </del>	╁	$-\frac{i}{1}$	+	2	\$580.00		KECI+KCFW Combo (KECI+KCFW)		5/2/18
62.0	Normal Line / SPOT	05/03/18-05/03/18	<del></del> '	-+	:30 9P- 10P (MST)	+-	┼	<del> </del>	<del></del>	<u> </u>	+	<u> </u>	+-				KECI+KCFW Combo (KECI+KCFW)		5/2/18
63.0	Normal Line / News	05/03/18-05/03/18	'		;30 10P- 10:35P (MST)		-	<u>!</u>	1	X I	$\dashv$	<u> </u>	+	1	\$660.00	<u>-</u> -			<del></del>
64.0	Normal Line / News	05/04/18-05/04/18	<u></u>	1	:30 10P- 10:35P (MST)	1	<del> </del>	1	1 1		X	+	+	1	\$660.00	<del></del>	KECI+KCFW Combo (KECI+KCFW)		5/2/18
65.0	Normal Line / News	05/07/18-05/07/18	՝	1	:30 10P- 10:35P (MST)	1	ı X	<u> </u>	1 1			<u> </u>	-	1	\$660.00	<del>`</del>	KECI+KCFW Combo (KECI+KCFW)		5/2/18
66.0	Normal Line / News	05/08/18-05/08/18		1	:30 10P- 10:35P (MST)	1		X					4	1	\$660.00	\$660,00	KECI+KCFW Combo (KECI+KCFW)	NEWS AT 10	5/2/18
67.0	Normal Line / News	05/09/18-05/09/18	T	1	:30 10P- 10:35P (MST)	1		<u></u>	Х		$\perp$	<u> </u>		1	\$660.00	\$660.00	KECI+KCFW Combo (KECI+KCFW	NEWS AT 10	5/2/18
	Normal Line / SPOT	05/08/18-05/08/18		1	:30 8P- 9P (MST)	1	.[	X					$\perp$	1	\$840.00	\$840.00	KECI+KCFW Combo (KECI+KCFW	RISE	5/2/18
				<del></del>	CO'	NFIF	₹M	ĀT	<b>101</b>	<u>1 C</u>	O'	ÑΤ	R/	AC	Γ	-			

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

Accepted-Station:

Accepted-Agency/Advertiser:

		Contract # Schedule Dates	3327500	Date Entered	05/02/18	KECI+KCFW Comb  By Broadcast Month	oo (KECI+l Spots	KCFW)
	. VEOLVOEW Camba VEOLVO		05/03/18-05/09/18 America First Action (122842)	Last Modified Entered By	05/02/18 Leslie Stoll-Oneill	May. 2018	93	\$3
	KECI+KCFW Combo KECI+KC 340 West Main St	Agency	Red Eagle Media Group (15829)	CO-OP	No	Grand Total:	93	\$3
	Missoula, MT 59802	Preduct	POLITICAL ISSUE (ns) (1187)	Headline #	ECR26004938			
		Brand	ISSUE ADVERTISING (218560)	Demo				
	<i>J</i> 5	Salesperson	Katz/DC, Washington DC (4022)	Order Type	Normal			
		Sales Office	Katz Washington DC	Package Deal		1		
Red Eagle Media Group		Buyer Name	Media Med,Eagle	Commission %	15.00			
815 Slaters Ln		Phone/Fax	1	Commission	\$5,148.75			
Alexandria, VA 22314	1.0	CPE	622/1149/9355	Net Total	\$29,176.25			
		Account Types	National/Political Issue Agency BRD	Sales Tax				
	i i	Billing Type	Standard					
		Comments	America First			-		

Line	Line Type / Break Type (Ref #)	Dates	Sec	Length Run	Times SPW	Mo	Tบ	We 1	Th Fr	Sa S	Su	Spots	Rate	Total	Station	Comments	Entered *
69.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30 7P- 8P (MST)	) 2		l x					2	\$860,00	\$1,720,00	KECI+KCFW Combo (KECI+KCFW	VOICE-TUE-NBC	5/2/18
70.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30 7P- 9P (MST)	) 2	X		<u>                                     </u>				2	\$900.00	\$1,800.00	KECI+KCFW Combo (KECI+KCFW	VOICE-NBC	5/2/18
																	1 3
																	, Ž
ļ																	•
				İ													
								-									
																	-,
	·																
		<del></del>		<u> </u>	CONFIR	ŔΜ.	ΑT	ION	CC	TM	R	ACT	<del></del>		1		
Accepted	-Agency/Advertiser:			Date:	Accepted-Station:								Date:	Comments:			

The parties intend for the Standard Advertiser Terms and Conditions ("Terms") located at... http://sbgi.net/7p=1224 ... to be part of their agreement, and the sale of advertising is expressly subject to said Terms.

Rate \$34,325.00 \$34,325.00



Contract # 26004938

Changes as of: 5/2/2018 at 9:15 AM

Version: Original Order

Station: KECI

Con Type: POLITICAL/VOTE

Advertiser: America First Action

Flight: 5/3/18 - 5/9/18

Market: Missoula

Total \$: \$34,325.00

Agency: RED EAGLE MEDIA GROU

CPE: 622/1149/9355

Total Spots: 93

RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA VA 22314

Product: America First

Office: WASHINGTON

Agency Order #: 7314717

Service: Nielsen

Total CPP: \$126.07

Buyer: Eagle Media Media Assistant, Red

Primary Demo: Adults 35-64

Total GRP: 272.3

Salesperson: MATTHEW MULZOFF 202-955-5342

Assistant: MATTHEW MULZOFF 202-955-5342

Separation:

Comments: Separation: 30

		T -											5/3	- 5/9	·	Total	Total		.
,	Day/Time	DP	Program	Rate	A3564 Rating	A35P Rating	l.en	5/3	5/4	5/5	5/6	5/7	5/8	5/9		Spots	\$	CPP*	GRP*
	Sa-Su 10a-5p		NHL Playoffs Day	\$125.00	1.6	0.5	30	0	0	3	3	0	0	0		6	\$750.00	\$76.22	9.8
	Th-F,M-W 2 2:30p-3p		JUDGE JUDY B	\$160.00	1.4	1.4	30	1	1	0	0	1	1	1_		5	\$800.00	\$112.68	7.1
-	Th-F,M-W 3 2p-2:30p		JUDGE JUDY	\$160.00	1.6	1.6	30	1	1	0	0	1	1	1		5	\$800.00	\$96.97	8.3
	Sa 1 5p-8p		NHL Playoffs Prime 7e/6c	\$175.00	7.2	4.0	30	0	0_	2	0_	0	0	0		2	\$350,00	\$24.20	14.5
	Sa 7a-8a		SATURDAY TODAY/AVG. ALL WKS	\$200.00	0.9	0.5	30	0	0	1	0	0	0	0		1	\$200.00	\$224.72	0.9
	Th-F,M-W 5 4p-5p		ELLEN	\$220,00	1.2	0.8	30	1	1_	0	0	1	1	1		5	\$1,100.00	\$183.33	6,0
-	Sa 7 4:30p-5:15p		KENTUCKY DERBY	\$275.00	36.5	6.0	30	0	0	1	0	0	0	0		1	\$275.00	\$7.54	36.5
	Su 3 10:30p-11p		FULL MEASURE	\$280.00	1.7	1.9	30	0	0	0	1	0	0	0		1	\$280.00	\$166.67	1.7
	Th-F,M-W 10:35p-11:35p		TONITE SHW-NBC	\$290.00	1.5	1,6	30	1	_ 1	0	0	1	1	1		5	\$1,450.00	\$197,28	7.3
11	Su 0 9a-10a		MEET PRESS-SUN	\$290.00	1.8	1.9	30	0	0	0	2	0	0	0		2	\$580.00	\$164.77	3.5
1	Th-F,M-W 1 6:30a-7a		MONTANA TODAY3	\$290.00	1.9	2,2	30	1	1	0	0	1	1	1		5	\$1,450.00	\$152.63	9.5
1:	Sa 2 5p-5:30p		NEWS AT 5 - SA	\$300.00	3.1	4.7	30	0	0	1	0	0	0	_0		1	\$300.00	\$97.40	3.1
1	Th-F,M-W 3 8a-9a		TODAY SHW<	\$340.00	1.9	1.7	30	2	2	0	0_	2	2	2_		10	\$3,400.00	\$176.17	19.3
1	Th-F,M-W 4 7a-8a		TODAY SHW<	\$340.00	2.2	1.8	30	2	2	0	0_	2	2	2		10	\$3,400.00	\$154.55	22,0
1.	Sa 5 9:30p-11p		SAT NITE LIVE	\$400.00	6.0	5,4	30	0	0	1	0	0	0	0		1	\$400.00	\$66.78	6.0
1	F 6 7p-8p		BLINDSPOT	\$400.00	2.2	2.1	30	0	2	0_	0	0	0	0		2	\$800.00	\$182.65	4.4
	F 7 8p-9p		TAKEN	\$400.00	3.4	3,5	30	0_	2	0	0	0	0	0		2	\$800.00	\$118.69	6.7
	Sa 8 10p-10;30p		SAT NITE LIVE	\$410.00	7.2	6.3	30	0	0	1	0	0	0	0		1	\$410.00	\$57.10	7.2



Contract # 26004938

CPE: 622/1149/9355

Agency: RED EAGLE MEDIA GROU

RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA VA 22314

Changes as of: 5/2/2018 at 9:15 AM

Flight: 5/3/18 - 5/9/18

Advertiser: America First Action

Product: America First

Version: Original Order

Station: KECl Market: Missoula Con Type: POLITICAL/VOTE

Total \$: \$34,325.00

Office: WASHINGTON

Total Spots: 93

Service: Nielsen

Agency Order #: 7314717

Buyer: Eagle Media Media Assistant, Red

Primary Demo: Adults 35-64

Total CPP: \$126.07 Total GRP: 272.3

Salesperson: MATTHEW MULZOFF 202-955-5342

Assistant: MATTHEW MULZOFF 202-955-5342

Separation:

					ļ						5/3	- 5/9		Total	Total		ı
DP	Program	Rate	A3564 Rating	A35P Rating	Len	5/3	5/4	5/5	5/6	5/7	5/8	5/9		Spots	\$	CPP*	GRP
	DATELNE FR-NBC	\$440.00	3.0	2,9	30	0	2	0	0	0	0	0		2	\$880.00	\$146.67	6.
	NEWS AT 5	\$460.00	3.1	4.7	30	1	1	0	0	1	1	1		5	\$2,300.00	\$149.35	15.
	LAW AND ORDER	\$460.00	4.9	5.1	30	0	0	0	0	0	0_	1		1	\$460.00	\$94.26	4.
	TIMELESS	\$500.00	2.0	1.9	30	0	0	0_	1	0	0	0		1	\$500 <u>.00</u>	\$250,00	2.
	NEWS AT 6	\$540.00	2.5	4.1	30	1	1	0	0	1	1_	1		5	\$2,700.00	\$215.14	12.
	BLACKLIST-NBC	\$560.00	4.8	4.6	30	0	0	0_	0	0	0	2		2	\$1,120.00	\$116.67	9.
	CHICAGO FIRE	\$580.00	2.5	3,6	30	_2	0	0	0	0	0	0_		2	\$1,160.00	\$232.00	_ 5.
	NEWS AT 10	\$660.00	3.7	5.7	30	1	1	0	0	1	1	1	<b>→</b>	5	\$3,300.00	\$176 <u>.</u> 94	18.
	RISE	\$840 <u>.00</u>	4.9	4,9	30	0	0	0	0	0	1	0		1	\$840,00	\$171.08	4.
	VOICE-TUE-NBC	\$860,00	4.1	4.4	30	0	0	0	0	0	2	0_		2	\$1,720.00	\$210.27	8.
	VOICE-NBC	\$900.00	5.7		30	0	0	0	0_	2	0	0		2	` ` `		11. 272.
· · · · · · · ·	DP	DATELNE FR-NBC  NEWS AT 5  LAW AND ORDER  TIMELESS  NEWS AT 6  BLACKLIST-NBC  CHICAGO FIRE  NEWS AT 10  RISE  VOICE-TUE-NBC	DATELNE FR-NBC \$440.00  NEWS AT 5 \$460.00  LAW AND ORDER \$460.00  TIMELESS \$500.00  NEWS AT 6 \$540.00  BLACKLIST-NBC \$560.00  CHICAGO FIRE \$580.00  NEWS AT 10 \$660.00  RISE \$840.00  VOICE-TUE-NBC \$860.00	DATELNE FR-NBC   \$440.00   3.0     NEWS AT 5   \$460.00   3.1     LAW AND ORDER   \$460.00   4.9     TIMELESS   \$500.00   2.0     NEWS AT 6   \$540.00   2.5     BLACKLIST-NBC   \$560.00   4.8     CHICAGO FIRE   \$580.00   2.5     NEWS AT 10   \$660.00   3.7     RISE   \$840.00   4.9     VOICE-TUE-NBC   \$860.00   4.1	DATELNE FR-NBC \$440.00 3.0 2.9  NEWS AT 5 \$460.00 3.1 4.7  LAW AND ORDER \$460.00 4.9 5.1  TIMELESS \$500.00 2.0 1.9  NEWS AT 6 \$540.00 2.5 4.1  BLACKLIST-NBC \$560.00 4.8 4.6  CHICAGO FIRE \$580.00 2.5 3.6  NEWS AT 10 \$660.00 3.7 5.7  RISE \$840.00 4.9 4.9  VOICE-TUE-NBC \$860.00 4.1 4.4  VOICE-NBC \$900.00 5.7 5.9	DP   Program   Nate   Rating	DATELNE FR-NBC   \$440.00   3.0   2.9   30   0	DATELNE FR-NBC   \$440.00   3.0   2.9   30   0   2	DP   Program   Rating   Rati	DP   Program   Nate   Rating   Rating   Esti   Sto	DP   Program   Nate   Rating   Rating   Ech   So   Sh   Sh   Sh   Sh   Sh   Sh   S	DATELNE FR-NBC	DATELNE FR-NBC	DATELNE FR-NBC   \$440.00   3.0   2.9   30   0   2   0   0   0   0   0	DATELNE FR-NBC	DATELNE FR-NBC   \$440.00   3.0   2.9   30   0   2   0   0   0   0   0   2   \$880.00	DATELNE FR-NBC



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

Flight: 5/3/18 - 5/9/18

Con Type: POLITICAL/VOTE CPE: 622/1149/9355 Station: KECI Agency: RED EAGLE MEDIA Advertiser: America First Action Total \$: \$34,325.00 Market: Missoula GROU

RED EAGLE MEDIA Product: America First Office: WASHINGTON Total Spots: 93

**GROUP 815 SLATERS** LANE ALEXANDRIA

VA 22314 Total CPP: \$126.07 Agency Order #: 7314717 Service: Nielsen

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

Salesperson: MATTHEW MULZOFF Assistant: MATTHEW MULZOFF

202-955-5342 202-955-5342

Separation:

Special Instructions

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

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

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

	Monthly Sumi	mary
Month	Spots	Dollars
2018-May	93	\$34,325,00
Total	93	\$34,325.00

	Transaction History										
Trans	Created/Received	Created by	Status	Spot+	Spot-	\$ Chg	Contract \$	Comment			
Queued for Electronic Contracting	5/2/18 10:06 AM	_				\$0	\$0				
Queued for Electronic Contracting	5/2/18 10:05 AM					\$0	\$0				
New	5/2/18 9:15 AM	MATTHEW MULZOFF	New	93		\$34,325.00	\$34,325,00				

Non-Discrimination Policy

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

### AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Date:
5-2-18

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: America First Action

### 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):
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").

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

List the chief executive officers or members of the executive committee or the board of

directors below (or attach separately):

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

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



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

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



#### TO BE COMPLETED FOR ALL ISSUE ADVERTISEMENTS

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

oer
)÷

#### 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
					•
					1 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 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 N



KTVM 340 West Main St Missoula, MT 59802

Red Eagle Media Group 815 Slaters Ln Alexandria, VA 22314

#### Contract # 3327537

Schedule Dates Advertiser

Agency

**Buyer Name** 

Comments

05/03/18-05/09/18

America First Action (122842)

Red Eagle Media Group (15829)

Product POLITICAL ISSUE (ns) (1187)
Brand ISSUE ADVERTISING (218560)

Salesperson Katz/DC, Washington DC (4022)
Sales Office Katz Washington DC

Katz Washington DC Media Med,Eagle

Phone/Fax

CPE 622/1149/9355

Account Types National/Political Issue Agency BRD
Billing Type Standard

America First Separation: 30 Date Entered Last Modified

Entered By

05/02/18 05/02/18

Leslie Stoll-Oneill

CO-OP No

ECR26004941

\$24,042.25

Headline #

Order Type Normal

Package Deal

Commission % 15.00

Commission \$4,242.75

Net Total Sales Tax

Butte-Bozeman (K		
By Broadcast Month	Spots -	Rate
May. 2018	99	\$28,285.00
Grand Total:	99	\$28,285.00

Line	Line Type / Break Type (Ref #)	Dates	Sec	c Length	Run Times	SPM	V M	,o T	Γu	We	Th F	Fr '	Sa £	úU	Spots	Rate	Total	Station	Comments	Entered
1.0	0 Normal Line / News	05/03/18-05/03/18	1	1 :30	0 5P- 5:30P (MST)		1	1		I = I	x	1			1	\$330.00	30.00	Butte-Bozeman (KTVM)	NEWS AT 5	5/2/18
2.0	0 Normal Line / News	05/04/18-05/04/18	1	i 30	0 5P- 5:30P (MST)		1	Ī	-	. 1		x			1	\$330.00	0 \$330,00	Butte-Bozeman (KTVM)	NEWS AT 5	5/2/18
3.0	0 Normal Line / News	05/07/18-05/07/18	1	1 :30	0 SP- 5:30P (MST)		1 X	Œ	J	1	-	-	ī		1	\$330,00	30,000	0 Butte-Bozeman (KTVM)	NEWS AT 5	5/2/18
4.0	0 Normal Line / News	05/08/18-05/08/18	)	1 ;30	0 SP- 5:30P (MST)		1	$\Box$	х		$\perp$			$\int$	1	\$330.00	\$330.00	0 Butte-Bozeman (KTVM)	NEWS AT 5	5/2/18
5.0	0 Normal Line / News	05/09/18-05/09/18	1	15:30	0 5P- 5:30P (MST)		1	Ţ		X	T			$\int$	1	\$330.00	\$330.00	0 Butte-Bozeman (KTVM)	NEWS AT 5	5/2/18
6,0	0 Normal Line / News	05/03/18-05/03/18	1	1 ;30	0 7A- 8A (MST)		2	Ī	!		х			$\int$	2	\$240.00	\$480.00	0 Butte-Bozeman (KTVM)	TODAY SHW<	5/2/18
7.0	0 Normal Line / News	05/04/18-05/04/18	3	1 ;30	0 7A- 8A (MST)		2	1				хİ			2	\$240.00	\$480.00	0 Butte-Bozeman (KTVM)	TODAY SHW<	5/2/18
8.0	0 Normal Line / News	05/07/18-05/07/18	,	1 :30	0 7A- 8A (MST)		2 X	$\overline{\perp}$	-		<u> </u>				2	\$240.00	\$480.00	0 Butte-Bozeman (KTVM)	TODAY SHW<	5/2/18
9,0	0 Normal Line / News	05/08/18-05/08/18	,	1 :30	0 7A- 8A (MST)		2	,	x			1			2	\$240.00	\$480.00	0 Butte-Bozeman (KTVM)	TODAY SHW<	5/2/18
10.0	0 Normal Line / News	05/09/18-05/09/18	1	1 ;30	0 7A- 8A (MST)		2	I		x				$\int$	2	\$240.00	3 \$480.00	0 Butte-Bozeman (KTVM)	TODAY SHW<	5/2/18
11.0	0 Normal Line / SPOT	05/09/18-05/09/18	1	1 :30	0 9P- 10P (MST)		1	I		x	- 1			$\Box$	1	\$430,00	\$430.00	0 Butte-Bozeman (KTVM)	CHICAGO PD-NBC	5/2/18
12,0	0 Normal Line / News	05/06/18-05/06/18	$\neg \neg$	1 :30	0 10P- 10:30P (MST)		1			1	1	1	1	χŢ	1	\$310.00	\$310.00	0 Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18
13.0	0 Normal Line / News	05/05/18-05/05/18		1 :30	0 SP- 5:30P (MST)		1	$\overline{\perp}$		$\Box$		ļ	x l		1	\$260.00	\$260.00	0 Butte-Bozeman (KTVM)	NEWS AT 5 - SA	5/2/18
						NFIF	<u>L</u>	ΛΔ		$\overline{\Box}$	NI C	$\overline{\sim}$	TIA	븕	بِ ۵۲٫	<del></del> /	<u> </u>			

Accepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:
				<u> </u>

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.



340 West Main St Missoula, MT 59802

Red Eagle Media Group 815 Slaters Ln Alexandria, VA 22314

#### Contract # 3327537

Schedule Dates Advertiser

Agency Product

Brand Salesperson

Sales Office **Buyer Name** 

Phone/Fax

**Account Types** Billing Type

Comments

05/03/18-05/09/18 America First Action (122842) Red Eagle Media Group (15829) POLITICAL ISSUE (ns) (1187)

ISSUE ADVERTISING (218560) Katz/DC, Washington DC (4022)

Katz, Washington DC Media Med, Eagle

622/1149/9355 National/Political Issue Agency BRD

Standard America First Separation: 30 Date Entered 05/02/18 Last Modified

05/02/18 Leslie Stoll-Oneill

CO-OP Νo

ECR26004941 Headline #

Demo

Entered By

Order Type Normal

Package Deal Commission %

15.00

Commission \$4,242.75 Net Total \$24,042.25

Sales Tax

Butte-Bozeman (K	TVM)	1
By Broadcast Month	-	Rate
May. 2018	99	\$28,285,00
Grand Total:	99	\$28,285.00
		İ
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	¢:	

Line	Line Type / Break Type (Ref #)	Dates	Sec	c Length	Run Times	SPW	/ Mo	Τυ	ı W	ve Th	Fr	Sa	Su	Spots	Rate	Total	Station	Comments	Entered
14.0	Normal Line / SPOT	05/03/18-05/03/18	1	1 :30	8A- 9A (MST)	;	2			X	1			2	\$240,00	\$480,00	Butte-Bozeman (KTVM)	TODAY SHW	5/2/18
15.0	Normal Line / News	05/04/18-05/04/18	1	:30	8A- 9A (MST)	:	2	1_			l x	<u> </u>		2	\$240.00	\$480,00	Butte-Bozeman (KTVM)	TODAY SHW	5/2/18
16.0	Normal Line / News	05/07/18-05/07/18	1	:30	8A- 9A (MST)	;	2 X		1		1			2	\$240.00	\$480.00	Butte-Bozeman (KTVM)	TODAY SHW	5/2/18
17.0	Normal Line / News	05/08/18-05/08/18	1	1 :30	8A- 9A (MST)		2	X		1				2	\$240.00	\$480.00	Butte-Bozeman (KTVM)	TODAY SHW	5/2/18
18.0	Normal Line / News	05/09/18-05/09/18	1	:30	8A- 9A (MST)	T :	2		7>	x I				2	\$240.00	\$480.00	Butte-Bozeman (KTVM)	TODAY SHW	5/2/18
19.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	9A- 10A (MST)	:	2	1		1	i		х	2	\$270.00	\$540.00	Butte-Bozeman (KTVM)	MEET PRESS-SUN	5/2/18
20.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	6:30P- 7P (MST)		1	-	į	ł x	Ţ		- 1	1	\$250.00	\$250.00	Butte-Bozeman (KTVM)	ENT TONIGHT 30<	5/2/18
21.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	6:30P- 7P (MST)	T :	1		T		‡ x			1	\$250.00	\$250.00	Butte-Bozeman (KTVM)	ENT TONIGHT 30<	5/2/18
22.0	Normal Line / SPOT	05/07/18-05/07/18	1	1 :30	6:30P-7P (MST)		1 X		1	ì	İ			1	\$250.00	\$250.00	Butte-Bozeman (KTVM)	ENT TONIGHT 30 <	5/2/18
23.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	6:30P-7P (MST)		1	X		1	1			1	\$250.00	\$250.00	Butte-Bozeman (KTVM)	ENT TONIGHT 30 <	5/2/18
24.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	6:30P-7P (MST)	T :	1	1	7>	x ‡	-	1		1	\$250,00	\$250,00	Butte-Bozeman (KTVM)	ENT TONIGHT 30<	5/2/18
25.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	7P- 8P (MST)	:	2			x				2	\$350.00	\$700,00	Butte-Bozeman (KTVM)	SUPERSTORE/THE GOOD PLACE	5/2/18
26.0	Normal Line / News	05/03/18-05/03/18	1	:30	10P- 10:35P (MST)		1			Х	<u> </u>			1	\$360.00	\$360,00	Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18
	· · · · · · · · · · · · · · · · · · ·	_!	'ـــــــــــــــــــــــــــــــــــ	لــــــــا	COL	VIETE	<u> </u>	ΔŦ		$\frac{1}{1}$	$\overline{CC}$	777	긒	AC	Ti	·	· · · · · · · · · · · · · · · · · · ·		<del></del>

	CONFIRMATION CONTRACT											
ccepted-Agency/Advertiser:	Date:	Accepted-Station:	Date:	Comments:								

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



KTVM 340 West Main St Missoula, MT 59802

Red Eagle Media Group 815 Slaters Ln Alexandria, VA 22314

#### Contract # 332

Schedule Dates Advertiser

ivertiser Jency

Agency Product

Brand Salesperson

Sales Office Buyer Name

CPE
Account Types

Billing Type
Comments

Date:

Phone/Fax

3327537

05/03/18-05/09/18

America First Action (122842) Red Eagle Media Group (15829)

POLITICAL ISSUE (ns) (1187) ISSUE ADVERTISING (218560)

Katz/DC, Washington DC (4022)

Katz Washington DC Media Med,Eagle

/ 622/1149/9355

National/Political Issue Agency BRD

Standard America First Separation: 30 Date Entered

Last Modified

05/02/18 05/02/18

Comments:

Date:

Entered By Leslie Stoll-Oneill

CO-OP NO

Headline # ECR26004941

Demo

Order Type Normal

Package Deal

Commission % 15.00

Commission \$4,242.75

Net Total \$24,042.25

Sales Tax

Butte-Bozeman (K	TVM)	1
By Broadcast Month	Spots	Rate
May. 2018	99	\$28,285.00
Grand Total:	99	\$28,285.00
		, , =5.00
T-11-1-12-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-		المستجدين

Line	Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPW	Мо	Tu	We	Th	Fr	Sa	Şu	Spots	Rate	Total	Station	Comments	Entered
27,0	Normal Line / News	05/04/18-05/04/18	1	:30	10P- 10:35P (MST)	1			!		x	<u> </u>	<u> </u>	1	\$360.00	\$360,00	Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18
28.0	Normal Line / News	05/07/18-05/07/18	1	:30	10P- 10:35P (MST)	1	x_	<u> </u>			<u> </u>	ļ	<u> </u>	1	\$360.00	\$360,00	Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18
29.0	Normal Line / News	05/08/18-05/08/18	7	:30	10P- 10:35P (MST)	1		X		<u> </u>	-		1	1	\$360.00	\$360,00	Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18
30.0	Normal Line / News	05/09/18-05/09/18	1	:30	10P- 10:35P (MST)	1			Ιx			ĺ		1	\$360,00	\$360.00	Butte-Bozeman (KTVM)	NEWS AT 10	5/2/18
31.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	6P- 7P (MST)	1			1		ĺ	-	x	1	\$330.00	\$330.00	Butte-Bozeman (KTVM)	DATELINE	5/2/18
32,0	Normal Line / News	05/03/18-05/03/18	1	:30	6P- 6:30P (MST)	1			Ì	ļχ				1	\$370.00	\$370.00	Butte-Bozeman (KTVM)	NEWS AT 6	5/2/18
33,0	Normal Line / News	05/04/18-05/04/18	1	:30	6P- 6:30P (MST)	1			1	1	X		-	1	\$370.00	\$370.00	Butte-Bozeman (KTVM)	NEWS AT 6	5/2/18
34.0	Normal Line / News	05/07/18-05/07/18	1	:30	6P- 6:30P (MST)	1	x		ŀ	Ī	-	i		1	\$370.00	\$370.00	Butte-Bozeman (KTVM)	NEWS AT 6	5/2/18
35.0	Normal Line / News	05/08/18-05/08/18	1	:30	6P- 6:30P (MST)	1		Х	Ţ	1		[	<u> </u>	1	\$370.00	\$370.00	Butte-Bozeman (KTVM)	NEWS AT 6	5/2/18
36,0	Normal Line / News	05/09/18-05/09/18	1	:30	6P- 6:30P (MST)	1			l x		Ì		Ï	1	\$370.00	\$370.00	Butte-Bozeman (KTVM)	NEWS AT 6	5/2/18
37.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	7P- 8P (MST)	1			l x			Ì		1	\$420.00	\$420.00	Butte-Bozeman (KTVM)	BLACKLIST-NBC	5/2/18
38.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	7P- 8P (MST)	1			1	Π	1	1	x	1	\$330.00	\$330.00	Butte-Bozeman (KTVM)	LITTLE BIG SHOTS	5/2/18
39.0	Normal Line / Hockey	05/05/18-05/05/18	2	:30	5P- 8P (MST)	1			1	1	1	Ι×	Ī	1	\$150.00	\$150.00	Butte-Bozeman (KTVM)	NHL PLAYOFFS	5/2/18
40.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30	7P- 9P (MST)	2	Х	1		<u> </u>	-			. 2	\$660.00	\$1,320.00	Butte-Bozeman (KTVM)	VOICE-NBC	5/2/18
	<del></del>	-			CON	FIF	M.	$\overline{AT}$	10	$\overline{N}$	C	NC	TF	AC <sup>*</sup>	Γ	·			

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.

Accepted-Station:

Accepted-Agency/Advertiser:



KTVM 340 West Main St Missoula, MT 59802

Red Eagle Media Group 815 Slaters Ln Alexandria, VA 22314

#### Contract #

Schedule Dates Advertiser

Agency

Product

Salesperson

Sales Office

Buyer Name

Brand

es 05/03/18-05/09/18 America First Action

America First Action (122842) Red Eagle Media Group (15829)

POLITICAL ISSUE (ns) (1187)

ISSUE ADVERTISING (218560)
Katz/DC, Washington DC (4022)

Katz Washington DC Media Med,Eagle

3327537

Phone/Fax

CPE 622/1149/9355

Account Types National/Political Issue Agency BRD

Billing Type Standard

Comments America First Separation: 30

Date Entered Last Modified

Entered By

05/02/18

05/02/18 Leslie Stoll-Oneill

CO-OP No

Headline # ECR26004941

Demo

Normal

Order Type Package Deal

Commission % 15.00

Commission \$4,242.75

Net Total \$24,042.25

Sales Tax

Broadcast Month	Spots -	<u>Rate</u>				
ay. 2018	99	<u>\$28,</u> 285.00				
and Total:	99	\$28,285.00				

Line Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPM	/ M	0 T	u I	We	Th	Fr S	a Su	Sp	ots	Rate	Total	Station	Comments	Entered
41.0 Normal Line / SPOT	05/04/18-05/04/18	1	:30	8P- 9P (MST)		1			ł	-	хI			1	\$360,00	\$360,0	0 Butte-Bozeman (KTVM)	TAKEN	5/2/18
42.0 Normal Line / SPOT	05/05/18-05/05/18	1	:30	9:30P- 11P (MST)		2		1			; )	( L		2	\$280.00	\$560,0	0 Butte-Bozeman (KTVM)	SAT NITE LIVE	5/2/18
43.0 (formal Line / SPOT	05/03/18-05/03/18	1	:30	4P- 5P (MST)		1		-		x	į	İ		1	\$200.00	\$200.0	0 Butte-Bozeman (KTVM)	ELLEN	5/2/18
44.0 Normal Line / SPOT	05/04/18-05/04/18	1	:30	4P- 5P (MST)		1			_		хļ	Ì		1	\$200.00	\$200.0	0 Butte-Bozeman (KTVM)	ELLEN	5/2/18
45.0 Normal Line / SPOT	05/07/18-05/07/18	1	:30	4P- 5P (MST)		ı x				1	-		_	1	\$200.00	\$200.0	0 Butte-Bozeman (KTVM)	ELLEN	5/2/18
46,0 Normal Line / SPOT	05/08/18-05/08/18	1	:30	4P- 5P (MST)	l	1	1 >	<u> </u>	- [	l	İ			1	\$200.00	\$200.0	0 Butte-Bozeman (KTVM)	ELLEN	5/2/18
47,0 Normal Line / SPOT	05/09/18-05/09/18	1	:30	4P- 5P (MST)	[	ı	i		х¦	1		ĺ		1	\$200.00	\$200.0	0 Butte-Bozeman (KTVM)	ELLEN	\$/2/18
48.0 Normal Line / News	05/05/18-05/05/18	1	:30	10P- 10;30P (MST)		1	1			-	>			1	\$310,00	\$310.0	0 Butte-Bozeman (KTVM)	SAT NITE LIVE	5/2/18
49.0 Normal Line / SPOT	05/03/18-05/03/18	1	:30	9P- 10P (MST)		2				х		1		2	\$490.00	\$980.0	0 Butte-Bozeman (KTVM)	CHCGO FIRE-NBC	5/2/18
50,0 Normal Line / SPOT	05/03/18-05/03/18	1	:30	10:35P- 11:35P (MST)		1			1	x	!			1	\$230.00	\$230.0	0 Butte-Bozeman (KTVM)	TONITE SHW-NBC	5/2/18
51.0 Normal Line / SPOT	05/04/18-05/04/18	1	:30	10:35P+ 11:35P (MST)		1		_1	ļ		x l			1	\$230.00	\$230.0	0 Butte-Bozeman (KTVM)	TONITE SHW-NBC	5/2/18
52.0 Normal Line / SPOT	05/07/18-05/07/18	1	:30	10:35P- 11:35P (MST)		1 X	:	1	į	-	į			1	\$230.00	\$230.0	0 Butte-Bozeman (KTVM)	TONITE SHW-NBC	5/2/18
53.0 Normal Line / SPOT	05/08/18-05/08/18	1	:30	10:35P- 11:35P (MST)		1	] x	(	1					1	\$230.00	\$230.0	Butte-Bozeman (KTVM)	TONITE SHW-NBC	5/2/18
54,0 Normal Line / SPOT	05/09/18-05/09/18	1	:30	10:35P- 11:35P (MST)		1			x		ł			1	\$230.00	\$230.0	Butte-Bozeman (KTVM)	TONITE SHW-NBC	5/2/18

D Halloritat End / Dr O1	03/03/10 03/03/10	1 2 100 2000: 1111	(1.0.7)	1 1 1 1 1 1		7.55.55 55.55 55.55 57.57	TOTAL PART TIES	
	<u> </u>		CONFIRM	NATION CONTRA	\CT			
Accepted-Agency/Advertiser:		Date:	Accepted-Station:		Date:	Comments:		

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



340 West Main St Missoula, MT 59802

Red Eagle Media Group 815 Slaters Ln Alexandria, VA 22314

#### Contract #

Schedule Dates Advertiser

Аделсу

Product Brand

Salesperson

Sales Office Buyer Name

Phone/Fax CPE

Account Types

Billing Type Comments

Date:

3327537 05/03/18-05/09/18

America First Action (122842)

Red Eagle Media Group (15829) POLITICAL ISSUE (ns) (1187)

ISSUE ADVERTISING (218560) Katz/DC, Washington DC (4022)

Katz Washington DC Media Med,Eagle

622/1149/9355

National/Political Issue Agency BRD

Standard America First Separation: 30 Date Entered Last Modified

Entered By

05/02/18 05/02/18

Leslie Stoll-Oneill

15,00

No CO-OP

ECR26004941 Headline #

Demo

Order Type Normal Package Deal

Commission % Commission

\$4,242.75 Net Total \$24,042.25

Date:

Comments:

Sales Tax

Butte-Bozeman (K By Broadcast Month May, 2018	TVM) <u>Spots</u> 99	Rate \$28,285.00
Grand Total:	99	\$28,285.00

Line	Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPW	Мо	Tu	We	Th:	Fr 5	a Su	Spots	Rate	Total	Station	Comments	Entered
55.0	Normal Line / News	05/03/18-05/03/18	1	:30	6:30A-7A (MST)	1	ι			X	<u> </u>	Ì	1	\$220.00	\$220.00	Butte-Bozeman (KTVM)	MONTANA TODAY3	5/2/18
56.0	Normal Line / News	05/04/18-05/04/18	1	:30	6:30A- 7A (MST)	1	l	1			x	Ī	1	\$220.00	\$220.00	Butte-Bozeman (KTVM)	MONTANA TODAY3	5/2/18
57.0	Normai Line / News	05/07/18-05/07/18	1	:30	6:30A-7A (MST)	1	X	i	-			Т	1	\$220.00	\$220.00	Butte-Bozeman (KTVM)	MONTANA TODAY3	5/2/18
58.0	Normal Line / News	05/08/18-05/08/18	1	:30	6:30A- 7A (MST)	1	ı.	Х	1				1	\$220,00	\$220,00	Butte-Bozeman (KTVM)	MONTANA TODAY3	5/2/18
59.0	Normal Line / News	05/09/18-05/09/18	1	:30	6:30A-7A (MST)	1	ı į		ļχ				1	\$220.00	\$220.00	Butte-Bozeman (KTVM)	MONTANA TODAY3	5/2/18
60.0	Normal Line / SPOT	05/09/18-05/09/18	1	;30	8P- 9P (MST)	1	ı İ	1	x		<del>   </del>		1	\$390.00	\$390.00	Butte-Bozeman (KTVM)	LAW & ORDER	5/2/18
61.0	Normal Line / SPOT	05/04/18-05/04/18	1	;30	7P- 8P (MST)	1	L		Ī		x	ļ	1	\$350.00	\$350.00	Butte-Bozeman (KTVM)	BLINDSPOT-NBC	5/2/18
62.0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	8P- 9P (MST)	2	2	X				ĺ	2	\$420.00	\$840.00	Butte-Bozeman (KTVM)	RISE	5/2/18
63.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	11:05P- 12:05A (MST)	1		1	Ī	;		x	1	\$170.00	\$170.00	Butte-Bozeman (KTVM)	ENT TONIGHT 60	5/2/18
64.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	10:35P- 11:05P (MST)	1	Ī	1		1		X	1	\$200.00	\$200.00	Butte-Bozeman (KTVM)	FULL MEASURE	5/2/18
65,0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	7P- 8P (MST)	2	2	x	1	!			2	\$630,00	\$1,260.00	Butte-Bozeman (KTVM)	VOICE-TUE-NBC	5/2/18
66.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	10A- 11A (MST)	2	2		1	X	i	1	2	\$190.00	\$380.00	Butte-Bozeman (KTVM)	LVE-KELLY&RYAN	5/2/18
67.0	Normal Line / SPOT	05/04/18-05/04/18	1	:30	10A- 11A (MST)	2	2	Ī			x	1	2	\$190.00	\$380.00	Butte-Bozeman (KTVM)	LVE-KELLY&RYAN	5/2/18
68.0	Normal Line / SPOT	05/07/18-05/07/18	1	:30	10A- 11A (MST)	2	X		-			į	2	\$190.00	\$380.00	Butte-Bozeman (KTVM)	LVE-KELLY&RYAN	5/2/18
	<u> </u>			1	CON	FIF	₹M	ΑT	ΊΟ	N (	CO	ÎT	RAC	T				

The parties intend for the Standard Advertiser Terms and Conditions ("Terms") located at... http://sbgi.net/1p=1224 ... to be part of their agreement, and the sale of advertising is expressly subject to said Terms.

Accepted-Station:

Accepted-Agency/Advertiser:



KTVM Missoula, MT 59802

Red Eagle Media Group 815 Slaters Ln Alexandria, VA 22314

#### Contract #

Schedule Dates Advertiser

Brand

Sales Office

Buyer Name

Agency

Product Salesperson

Media Med, Eagle

Phone/Fax

CPE Account Types

Billing Type Comments

3327537

05/03/18-05/09/18

America First Action (122842) Red Eagle Media Group (15829)

POLITICAL ISSUE (ns) (1187)

ISSUE ADVERTISING (218560) Katz/DC, Washington DC (4022)

Katz, Washington DC

622/1149/9355

National/Political Issue Agency BRD

Standard America First Separation: 30 Date Entered Last Modified

Entered By

05/02/18

05/02/18 Leslie Stoll-Oneill

CO-OP No

ECR26004941 Headline #

Demo

Normal

Order Type Package Deat Commission %

15.00 Commission \$4,242.75

Net Total \$24,042.25

Sales Tax

Butte-Bozeman (K	ΓVM)	1
By Broadcast Month		Rate
May, 2018	99	\$28,285,00
Grand Total:	99	\$28,285.00

Une	Line Type / Break Type (Ref #)	Dates	Sec	Length	Run Times	SPV	/ Мо	Τu	We	Th F	Fr Sa	Su !	Spots	Rate	Total	Station	Comments	Entered
69,0	Normal Line / SPOT	05/08/18-05/08/18	1	:30	10A- 11A (NST)		2	X					2	\$190.00	\$380,00	Butte-Bozeman (KTVM)	LVE-KELLY&RYAN	5/2/18
70.0	Normal Line / SPOT	05/09/18-05/09/18	1	:30	10A- 11A (MST)		2		x				2	\$190.00	\$380.00	Butte-Bozeman (KTVM)	LVE-KELLY&RYAN	5/2/18
71.0	Normal Line / Hockey	05/05/18-05/05/18	2	:30	10A- 5P (MST)		2			1	X		2	\$100.00	\$200,00	Butte-Bozeman (KTVM)	NHL PLAYOFFS DAY	5/2/18
72.0	Normal Line / Hockey	05/06/18-05/06/18	2	:30	10A- 5P (MST)		2			1		xΤ	2	\$100,00	\$200.00	Butte-Bozeman (KTVM)	NHL PLAYOFFS DAY	5/2/18
73.0	Normal Line / SPOT	05/06/18-05/06/18	1	:30	9P- 10P (MST)		1					ΧŢ	1	\$470,00	\$470.00	Butte-Bozeman (KTVM)	TIMELESS	5/2/18
74.0	Normal Line / SPOT	05/03/18-05/03/18	1	:30	8P- 9P (MST)		1			x	1		1	\$490,00	\$490.00	Butte-Bozeman (KTVM)	WILL AND GRACE/ AP BIO	5/2/18
75.0	Normal Line / Horse Racing	05/05/18-05/05/18	1	:30	4:30P- 5:15P (MST)		1		1 1	1	x		1	\$215.00	\$215.00	Butte-Bozeman (KTVM)	KENTUCKY DERBY	5/2/18
						NEI		ΙΔΤ	<u> </u>	10	ΓΝΟ		40					
								1	iOI	<b>V</b> C	OIV	1 1/	70		Ta .		·	
ccepted	1-Agency/Advertiser:			Date:	Accepted	1-Station	;							Date:	Comments:			

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



Contract # 26004941

CPE: 622/1149/9355

Agency: RED EAGLE MEDIA GROU

RED EAGLE MEDIA GROUP 815 SLATERS LANE ALEXANDRIA VA 22314

Changes as of: 5/2/2018 at 10:38 AM

Flight: 5/3/18 - 5/9/18

Advertiser: America First Action

Product: America First

Version: Current State Version 1

Station: KTVM Market: Butte, MT

Service: Nielsen

Con Type: POLITICAL/VOTE

Total \$: \$28,285.00

Office: WASHINGTON

Total Spots: 99

Agency Order #: 7314741

Buyer: Eagle Media Media Assistant, Red

Primary Demo: Adults 35-64

Total CPP: \$104.15 Total GRP: 271.6

Salesperson: MATTHEW MULZOFF 202-955-5342

Assistant: MATTHEW MULZOFF 202-955-5342

Traffic #: 3327537

Separation:

Comments: Separation: 30

													5/3	- 5/9		Total	Total		
#	Day/Time	DP	Program	Rate	A3564 Rating	A35P Rating	Len	5/3	5/4	5/5	5/6	5/7	5/8	5/9		Spots	\$	CPP*	GRP*
1	Th-F,M-W 5p-5:30p		NEWS AT 5	\$330.00	4.5	5.9	30	1	1	0	0	1	1	1		5	\$1,650.00	\$72.69	22.7
2	Th-F,M-W 7a-8a		TODAY SHW<	\$240,00	3.4	3,9	30	2	2	0	0	2_	2	2		10	\$2,400.00	\$70.59	34.0
3	W  9p-10p		CHICAGO PD-NBC	\$430.00	1.5	6.4	30	0	0	0	0	0	0	1		1	\$430.00	\$290.54	1.5
4	Su 10p-10:30p		NEWS AT 10	\$310.00	4.0	4.5	30	0	0	0	1	0	0	0		1	\$310.00	\$77.50	4.0
5	Sa 5p-5:30p		NEWS AT 5 - SA	\$260.00	2.6	3.7	30	0	0	1	0	0	0	0		1	\$260.00	\$100.78	2.6
6	Th-F,M-W 8a-9a		TODAY SHW	\$240.00	2.4	3,3	30	2	2	0	0	2	2	2		10	\$2,400.00	\$102.13	23.5
7	Su 9a-10a		MEET PRESS-SUN	\$270.00	2,8	3,6	30	0	0	0	2	0_	0	0	,	2	\$540,00	\$96.43	5.6
8	Th-F,M-W 6:30p-7p		ENT TONIGHT 30<	\$250.00	2.7	3.1	30	1	1	0_	0	1	11	1		5	\$1,250.00	\$93.63	13.3
9	Th 7p-8p		SUPERSTORE/THE GOOD PLACE	\$350,00	3.6	4.1	30	2	0_	0	0	0	0	0		2	\$700,00	\$97,49	7.2
10	Th-F,M-W 10p-10:35p		NEWS AT 10	\$360.00	4.0	4.0	30	1	1	0	0	1	1	1		5	\$1,800,00	\$90,23	20,0
11	Su  6p-7p		DATELINE	\$330,00	2.0	3.5	30	0	0	0	1	_0	0_	0		1	\$330,00	\$165.00	2.0
12	Th-F,M-W 6p-6:30p		NEWS AT 6	\$370.00	2.9	3.9	30	1	1	0	0	1	1	1		5	\$1,850.00	\$126.71	14.6
13	W 7p-8p		BLACKLIST-NBC	\$420,00	2.6	4.3	30	0	0	0	0	0	0	1	,	1	\$420.00	\$161.54	2.6
14	Su 7p-8p		LITTLE BIG SHOTS	\$330.00	2.5	3,3	30	0	0	0	1	0	0	0		1	\$330.00	\$132.00	2.5
15	Sa 5p-8p		NHL PLAYOFFS	\$150.00	4.0	1.4	30	0	0	1	0	0	0	0		1	\$150.00	\$37.50	4.0
16	M 7p-9p		VOICE-NBC	\$660.00	6.0	6.1	30	0	0	0	0	2	0	0		2	\$1,320.00	\$109.45	12.1
17	F 8p-9p		TAKEN	\$360.00	1.9	3.4	30	0	_1_	0	0	0	0	0		1	\$360.00	\$187.50	1.9
18	Sa 9:30p-11p		SAT NITE LIVE	\$280,00	2,8	2.4	30	0	0_	2	0	0	0	0		2	\$560.00	\$100.00	5.6



Contract # 26004941

CPE: 622/1149/9355

Agency: RED EAGLE MEDIA GROU

RED EAGLE MEDIA **GROUP 815 SLATERS** LANE ALEXANDRIA VA 22314

Changes as of: 5/2/2018 at 10:38 AM

Flight: 5/3/18 - 5/9/18

Advertiser: America First Action

Version: Current State Version 1

Station: KTVM

Market: Butte, MT

Total \$: \$28,285.00

Product: America First

Office: WASHINGTON

Service: Nielsen

Total Spots: 99

Agency Order#: 7314741

Buyer: Eagle Media Media

Primary Demo: Adults 35-64 Assistant, Red

Total CPP: \$104.15 Total GRP: 271.6

Salesperson: MATTHEW MULZOFF 202-955-5342

Assistant: MATTHEW MULZOFF 202-955-5342

Traffic #: 3327537

Con Type: POLITICAL/VOTE

Separation:

					Ţ								5/3 -	- 5/9		Total	Total		
#	Day/Time	DP	Program	Rate	A3564 Rating	A35P Rating	Len	5/3	5/4	5/5	5/6	5/7	5/8	5/9		Spots	\$	CPP*	GRP
	Th-F,M-W 4p-5p		ELLEN	\$200,00	1.9	1.7	30	1	1	0	0	1	1	_1		5	\$1,000.00	\$ <u>104.71</u>	9.5
	Sa 10p-10:30p	<u> </u>	SAT NITE LIVE	\$310,00	3.2	2.6	30	0_	0	1	0	0	0	0		1	\$310.00	\$97 <u>.</u> 79	3.2
21	Th 9p-10p		CHCGO FIRE-NBC	\$490.00	4.0	4.1	30	2	0	0	0	0	0	0_		2	\$980.00	\$120.99	8.
	Th-F,M-W 10:35p-11:35p		TONITE SHW-NBC	\$230.00	2.2	1.9	30	1	1	0	0	1	1	1		5	\$1,150.00	\$106.48	10.
23	Th-F,M-W 6:30a-7a		MONTANA TODAY3	\$220.00	1.5	1.8	30	1	1	0	0	1	1	1_		5	\$1,100.00	\$149.66	7.
	W 8p-9p		LAW & ORDER	\$390,00	1.9	3.2	30	0	0	0	0	0	0	1	·	1	\$390.00	\$203.13	1.
25	F 7p-8p		BLINDSPOT-NBC	\$350.00	2.0	2,7	30	0	1	0	0	0	0	0		1	\$350.00	\$177.66	2.
26	Tu 8p-9p		RISE	\$420,00	3.2	3.1	30	0	0	0	0	0	2	0_		2	\$840.00	\$130.84	6.
27	Su 11:05p-12:05a		ENT TONIGHT 60	\$170.00	1.7	1.2	30	0	0	0	1	0	0	0		1	\$170.00	\$98,27	1.
	Su 10:35p-11:05p		FULL MEASURE	\$200.00	1.2	1.4	30	0	0	0	1	0	0	0		1	\$200.00	\$170.94	1.
	Tu 7p-8p		VOICE-TUE-NBC	\$630,00	3.7	4.1	30	0	0	0	0	0	2	0	·	2	\$1,260.00	\$171.66	7.
	Th-F,M-W 10a-11a		LVE-KELLY&RYAN	\$190.00	1,2	1.2	30	2	2	0	0	2	2	2		10	\$1,900,00	\$163.79	11.
	Sa-Su 10a-5p		NHL PLAYOFFS DAY	\$100.00	3.0	0.6	30	0	0	2	2	0	0	0	· .	4	\$400.00	\$33.33	12.
	Sบ 9p-10p	T	TIMELESS	\$470.00	2.7	2.3	30	0	0	0	1	0	0	0	·	1	\$470.00	\$176.69	2.
	Th 8p-9p		WILL AND GRACE/ AP BIO	\$490.00	2.2	2.3	30	1	0	0	0	0	0	0		1	\$490.00	\$224.77	2,
	Sa 4:30p-5:15p		KENTUCKY DERBY	\$215,00	4.0	0.5	30	0	0	1	0	0	0	0		1	\$215.00	\$53.75	4.



Contract # 26004941

CPE: 622/1149/9355

Agency: RED EAGLE MEDIA GROU

RED EAGLE MEDIA **GROUP 815 SLATERS** LANE ALEXANDRIA VA 22314

Changes as of: 5/2/2018 at 10:38 AM

Flight: 5/3/18 - 5/9/18

Advertiser: America First Action

Version: Current State Version 1

Station: KTVM Market: Butte, MT Con Type: POLITICAL/VOTE Total \$: \$28,285,00

Product: America First

Office: WASHINGTON

Total Spots: 99

Agency Order #: 7314741

Buyer: Eagle Media Media

Primary Demo: Adults 35-64

Service: Nielsen

Total CPP: \$104.15 Total GRP: 271.6

Assistant, Red

Salesperson: MATTHEW MULZOFF 202-955-5342

Assistant: MATTHEW MULZOFF

202-955-5342

Traffic #: 3327537

Separation:

· ·		Order Level Comments	S
Date/Time	Added by	Comment	
	System	Notice Received.	<u>.                                    </u>
	MATTHEW MULZOFF	Separation: 30	

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

		Daypart	Summary		
Day/Time	% Distrib	Spots	Dollars	CPP	GRP
	100%	99	\$28,285.00	\$104,15	271,6
Total	100%	99	\$28,285.00	\$104.15	271.6

N	onthly Sumi	mary
Month	Spots	Dollars
2018-May	99	\$28,285.00
Total	99	\$28,285.00

				Trans	saction History		
Trans	Created/Received Created	l by Status	Spot+	Spot-	\$ Chg	Contract \$	\$ Comment
Queued for Electronic Contracting	5/2/18 10:05 AM				\$0	\$0	0
New	5/2/18 9:17 AM MATTH	EW MULZOFF Confirmed	99		\$28,285,00	\$28,285.00	0

Non-Discrimination Policy

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

### AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Station and Location:	Date:
KTVM BUTTE BOZEMAN	5/2/18
I, American Media and Advocacy Group do hereby request station time concerning the following issue:	
America First Action	

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

This broadcast time will be used by:	America	First	Action	
This broadcast time will be used by:		3 Haw 65363 -		

# 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):
the state of the same relating to any political matter of

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 he by (name and address):	as been furnished
Brian Welsh, Prosident 2205 Meln Line Blvd' Alexandria, VA 22301	
and you are authorized to announce the time as paid for by such personal (hereinafter referred to as the "sponsor").  List the chief executive officers or members of the executive committee the sponsor of the executive committee.	·
directors below (or attach separately):  Jon Proch, Treasurer  Brian Walsh, Bresident	

### 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 S	GNED BY ISSUE ADVERTISER (SP Signature	Contact Phone Number						
TO BE SIGNED BY STATION REPRESENTATIVE								
X Acdepted	☐ Accepted in Part	☐ Rejected						
	1 este 0 Neill	NSM						
Cigrature	Printed Name	Title						

#### AGREED UPON SCHEDULE

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

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

Attach proposed schedule with charges (if available):

#### AFTER AIRING OF BROADCASTS:

Attach invoices or Schedule Run Summary to this Form showing:

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

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

# EXHIBIT O

#### **ORDER**

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

#### Bill Plan

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

SPL

#### **Totals**

Month	# Spots	Gross Amount	Net Amount	Rating
October 2018	57	\$50,175.00	\$42,648.75	0.00
Totals	57	\$50,175,00	\$42,648,75	0.00

#### **Account Executives**

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

Order Share	Share	Total
KMOV	28%	\$50,175.00
Market	100%	\$179 196 43

Revenue Code 3:

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

_	Ln	Ch	Start	End	Inventory Code	Break	Start/End Tir	ne Days	Len S	Spots	Rate Pri	Rtg Type	Spots	Amount
Ī	N 1	KMOV	10/02/18	10/02/18	M-F 4-430am	CM	M-F 4-430am	- 1	:30	1	\$75.00 PMT	0.00 NM	1	\$75.00
					News 4 @ 4a									
		Star	t Date I	End Date	Weekdays	Spots/Week	Rate	Rating						
_	W	eek: 10/0	)1/18 <i>ʻ</i>	10/07/18	- 1	1	\$75.00	0.00						
	N 2	KMOV	10/05/18	10/05/18		CM	M-F 6-7am	1	:30	1	\$400.00 PMT	0.00 NM	1	\$400.00

Print Date: 10/09/18 16:57:39 Page 2 of 6

Order / Rev: 898464 Advertiser: Josh Hawley For Senate

Alt Order #: 09197759 Product Desc: HAWLEY 4 SENATE KMOV

Ln Ch Start End	-	Start/End Time Da	ays Len Spots	Rate Pri Rtg Type	Spots	Amount
	M-F 6-7am News 4 @ 6a	(6:00 AM-6:30 AM)				
Start Date End Date	Weekdays Spots/Week	Rate Rating				
Week: 10/01/18 10/07/18  N 3 KMOV 10/03/18 10/03/18	1 1 M-F 6-7am CM	\$400.00 0.00 M-F 6-7am 1	:30	1 \$400.00 PMT 0.00 NM	1	\$400.00
N 3 KWOV 10/03/10 10/03/10	News 4 @ 6a	(6:30 AM-7:00 AM)	30	1 \$400.00 FIVIT 0.00 INIVI	'	φ400.00
Start Date End Date	Weekdays Spots/Week	Rate Rating				
Week: 10/01/18 10/07/18  N 4 KMOV 10/04/18 10/04/18	1 1 M-F 6-7am CM	\$400.00 0.00 M-F 6-7am	1 :30	1 \$400.00 PMT 0.00 NM	1	\$400.00
10,000,000,000,000,000	News 4 @ 6a	(6:30 AM-7:00 AM)	1 .00	. • • • • • • • • • • • • • • • • • • •	·	Ψσσ.σσ
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 <u>End Date</u>	Weekdays Spots/Week	<u>Rate</u> <u>Rating</u> \$400.00 0.00				
	M-F 6-7am CM		- 1 :30	1 \$400.00 PMT 0.00 NM	1	\$400.00
	News 4 @ 6a	(6:30 AM-7:00 AM)		·		
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 10/07/18	Weekdays Spots/Week	Rate Rating \$400.00 0.00				
N 6 KMOV 10/05/18 10/05/18	<u>.</u>		- 1 :30	1 \$300.00 PMT 0.00 NM	1	\$300.00
0	CBS This Morning	5. 5.				
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 10/07/18	Weekdays Spots/Week	Rate Rating \$300.00 0.00				
N 7 KMOV 10/05/18 10/05/18	M-F 9-10am CM		- 1 :30	1 \$200.00 PMT 0.00 NM	1	\$200.00
Ctart Data - End Data	Great Day St. Louis	Data Dating				
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 10/07/18	Weekdays Spots/Week	Rate Rating \$200.00 0.00				
N 8 KMOV 10/07/18 10/07/18	Sun 6-8am CM		1 :30	1 \$200.00 PMT 0.00 NM	1	\$200.00
Start Date End Date	News 4 This Morning Weekdays Spots/Week	(7:00 AM-8:00 AM) Rate Rating				
Week: 10/01/18 10/07/18	1 <u>opois/week</u>	\$200.00 0.00				
N 9 KMOV 10/08/18 10/08/18	Y&R 11am-12pm CM	M-F 11a-12pm 1	:30	1 \$1,000.00 FNP 0.00 NM	1	\$1,000.00
Start Date End Date	Young and the Restless Weekdays Spots/Week	Rate Rating				
Week: 10/08/18 10/14/18	1 1	\$1,000.00 0.00				
N11 KMOV 10/03/18 10/03/18	Y&R 11am-12pm CM Young and the Restless	M-F 11a-12pm 1	:30 <i>′</i>	1 \$1,000.00 FNP 0.00 NM	1	\$1,000.00
Start Date End Date	Weekdays Spots/Week	Rate Rating				
Week: 10/01/18 10/07/18		\$1,000.00 0.00		4		<b>0.450.00</b>
N12 KMOV 10/08/18 10/08/18	M-F 430-5am CM News 4 @ 430a	M-F 430-5am 1	:30 <i>'</i>	1 \$150.00 PMT 0.00 NM	1	\$150.00
Start Date End Date	Weekdays Spots/Week	Rate Rating				
Week: 10/08/18 10/14/18  N14 KMOV 10/05/18 10/05/18	1 1 Y&R 11am-12pm CM	\$150.00 0.00 M-F 11a-12pm	- 1 :30	1 \$1,000.00 FNP 0.00 NM	1	\$1,000.00
N 14 KWOV 10/03/16 10/03/16	Young and the Restless	W-1 Ha-12piii	- 130	1 \$1,000.00 FINE 0.00 INIVI	'	φ1,000.00
Start Date End Date	Weekdays Spots/Week	Rate Rating				
Week: 10/01/18 10/07/18 N15 KMOV 10/05/18 10/05/18	1 1 M-F 430-5pm CM	<b>+</b> 1,0000000	- 1 :30	1 \$450.00 PMT 0.00 NM	1	\$450.00
1110 14110 1 10/00/10 10/00/10	Inside Edition	шт тоо орт	1 .00	. • • • • • • • • • • • • • • • • • • •		Ψ100.00
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 <u>End Date</u>	Weekdays Spots/Week	<u>Rate</u> <u>Rating</u> \$450.00 0.00				
N16 KMOV 10/08/18 10/08/18	M-F 4-430pm News CM		:30	1 \$400.00 PMT 0.00 NM	1	\$400.00
	News 4 @4pm					
Start Date	Weekdays Spots/Week	Rate Rating \$400.00 0.00				
N17 KMOV 10/02/18 10/02/18	M-F 4-430pm News CM		:30	1 \$400.00 PMT 0.00 NM	1	\$400.00
Chart Data - Find Data	News 4 @4pm	Data Dating				
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 10/07/18	Weekdays Spots/Week	Rate Rating \$400.00 0.00				
N18 KMOV 10/03/18 10/03/18	M-F 4-430pm News CM News 4 @4pm	M-F 4-430pm 1	:30	1 \$400.00 PMT 0.00 NM	1	\$400.00
Start Date End Date	Weekdays Spots/Week	Rate Rating				

Print Date: 10/09/18 16:57:39 Page 3 of 6

Order / Rev: 898464 Advertiser: Josh Hawley For Senate

Alt Order #: 09197759 Product Desc: HAWLEY 4 SENATE KMOV

Ln Ch	Start	End	Inventory Code	Break	Start/End Ti	me Days	Len Spo	te Rate	Pri Rtg Type	Snote	Amount
	rt Date	End Date	Weekdays	Spots/Week	Rate	Rating	Есп оро	is raic	TH Rig Type	Орого	Amount
Week: 10/		10/07/18	1	<u> </u>	\$400.00	0.00					
N19 KMOV		8 10/04/18	M-F 4-430pm Ne News 4 @4pm	ws CM	M-F 4-430pm		:30	1 \$400.00	PMT 0.00 NM	1	\$400.00
	rt Date	End Date	Weekdays	Spots/Week	Rate	Rating					
Week: 10/		10/07/18	1	1	\$400.00	0.00					
N20 KMOV	10/05/1	8 10/05/18	M-F 4-430pm Ne News 4 @4pm	ws CM	M-F 4-430pm	1	:30	1 \$400.00	PMT 0.00 NM	1	\$400.00
Sta Week: 10/	rt Date 01/18	End Date 10/07/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$400.00	Rating 0.00					
N21 KMOV	10/02/1	8 10/02/18	M-F 5-5:30p News 4 @ 5p	СМ	M-F 5-5:30p	- 1	:30	1 \$750.00	PMT 0.00 NM	1	\$750.00
Sta Week: 10/	rt Date	End Date 10/07/18	Weekdays	Spots/Week	<u>Rate</u> \$750.00	Rating 0.00					
N22 KMOV			M-F 5-5:30p	СМ	M-F 5-5:30p	1	:30	1 \$750.00	PMT 0.00 NM	1	\$750.00
	rt Date	End Date	News 4 @ 5p Weekdays	Spots/Week	Rate	Rating					
Week: 10/		10/07/18	1	1	\$750.00	0.00					
N23 KMOV	10/05/1	8 10/05/18	M-F 430-5am News 4 @ 430a	СМ	M-F 430-5am	1	:30	1 \$150.00	PMT 0.00 NM	1	\$150.00
<u>Sta</u> Week: 10/	rt Date 01/18	End Date 10/07/18	<u>Weekdays</u> 1	Spots/Week 1	Rate \$150.00	Rating 0.00					
N24 KMOV	10/04/1	8 10/04/18	M-F 5-5:30p News 4 @ 5p	СМ	M-F 5-5:30p	1	:30	1 \$750.00	PMT 0.00 NM	1	\$750.00
Sta Week: 10/	rt Date	End Date 10/07/18	Weekdays	Spots/Week	<u>Rate</u> \$750.00	Rating 0.00					
N25 KMOV			M-F 5-5:30p	СМ	M-F 5-5:30p	1	:30	1 \$750.00	PMT 0.00 NM	1	\$750.00
	rt Date	End Date	News 4 @ 5p Weekdays	Spots/Week	Rate	Rating					
Week: 10/		10/07/18	1	1	\$750.00	0.00					
N26 KMOV	10/06/1	8 10/06/18	Sat 6-6:30pm News 4 @ 6p	СМ	Sat 6-6:30pm	1-	:30	1 \$350.00	PMT 0.00 NM	0	\$0.00
<u>Sta</u> Week: 10/	rt Date 01/18	End Date 10/07/18	<u>Weekdays</u> 1-	Spots/Week 1	Rate \$350.00	Rating 0.00					
	Date Ra		escription		t/End Time	7	<i>Neekdays</i>		Rate Rtg Type		
	10/01/18 edited	8-10/07/18 S	at 6-6:30pm	Sat	6-6:30pm	-	· Sa	:30 <del>(\$35</del> 6	<del>9.00)</del> 0.00 <i>NM</i>		
N27 KMOV	10/08/1	8 10/08/18	M-F 6:30-7pm Entertainment To		M-F 6:30-7pm	າ 1	:30	1 \$1,000.00	FNP 0.00 NM	1	\$1,000.00
Sta Week: 10/	rt Date	End Date 10/14/18	Weekdays	Spots/Week	Rate \$1,000.00	Rating 0.00					
N29 KMOV			M-F 6:30-7pm	CM	M-F 6:30-7pm		:30	1 \$1,000,00	FNP 0.00 NM	1	\$1,000.00
NZO NWOV	10/00/1	0 10/00/10	Entertainment To		W 1 0.00 7 pm		.00	ι ψι,οοο.οο	0.00 1410	· '	ψ1,000.00
Sta Week: 10/	rt Date	End Date 10/07/18	<u>Weekdays</u> 1	Spots/Week	Rate \$1,000.00	Rating 0.00					
N31 KMOV			M-F 6:30-7pm Entertainment To	CM	M-F 6:30-7pm		:30	1 \$1,000.00	FNP 0.00 NM	1	\$1,000.00
	rt Date	End Date	Weekdays	Spots/Week	Rate	Rating					
Week: 10/ N32 KMOV		10/07/18 8 10/08/18	1 Mon 9-10pm	CM	\$1,000.00 Mon 9-10pm	0.00	:30	1 \$3,000.00	PMT 0.00 NM	1	\$3,000.00
Sta	rt Date	End Date	Bull Weekdays	Spots/Week	Rate	Rating					
Week: 10/	08/18	10/14/18	1	1	\$3,000.00	0.00					
	Date Ra 10/08/18	<u>nge</u> <u>D</u> 8-10/14/18 M	escription Ion 9-10pm		t/End Time 9-10pm	-	<u> </u>		Rate <u>Rtg Type</u> 9.00) 0.00 <i>NM</i>		
	e MG 32. correct Pi	2 riority Code]									
2 KMOV		3-10/08/18 N	lon 9-10pm	Mon	9-10pm	N	M	:30 \$3,00	0.00 0.00 NM		

Print Date: 10/09/18 16:57:39 Page 4 of 6

Order / Rev: 898464 Advertiser: Josh Hawley For Senate

Alt Order #: 09197759 Product Desc: HAWLEY 4 SENATE KMOV

Ln Ch Start End Inventory Code Break Start/End Time Days Len Spots Rate Pri Rtg Typ	e Spots	Amount
N33 KMOV 10/02/18 10/02/18 Tue 7-8pm CM Tue 7-8pm -1 :30 1 \$3,500.00 PMT 0.00 NI	1	\$3,500.00
Start Date         End Date         Weekdays         Spots/Week         Rate         Rating           Week: 10/01/18         10/07/18         - 1         1 \$3,500.00         0.00		
N34 KMOV 10/04/18 10/04/18 M-F 5-6am CM M-F 5-6am1 :30 1 \$300.00 PMT 0.00 NM	1	\$300.00
News 4 @ 5a (5:00 AM-5:30 AM) <u>Start Date End Date Weekdays Spots/Week Rate Rating</u>		
Week: 10/01/18         10/07/18        1         1         \$300.00         0.00           N35 KMOV 10/02/18 10/02/18 Tue 8-9pm         CM         Tue 8-9pm         -1         :30         1         \$4,000.00 PMT 0.00 NI	1 1	\$4,000.00
FBI Start Date End Date Weekdays Spots/Week Rate Rating		
Week: 10/01/18 10/07/18 -1 1 \$4,000.00 0.00	_[	
N36 KMOV 10/02/18 10/02/18 Tue 9-10pm CM Tue 9-10pm - 1 :30 1 \$2,000.00 PMT 0.00 NI NCIS: New Orleans	1	\$3,000.00
<u>Start Date</u> <u>End Date</u> <u>Weekdays</u> <u>Spots/Week</u> <u>Rate</u> <u>Rating</u> Week: 10/01/18 10/07/18 -1 1 \$2,000.00 0.00		
Spot Ch Date Range Description Start/End Time Weekdays Length Rate Rtg Type	<u>.</u> [	
1 KMOV 10/01/18-10/07/18 Tue 9-10pm Tue 9-10pm -T :30 <del>(\$2,000.00)</del> 0.00 NI See MG 36.2	1	
[Preempted per Lisa Woods]		
2 KMOV 10/01/18-10/07/18 Tue 9-10pm Tue 9-10pm - T :30 \$3,000.00 0.00 NI  M MG for 36.1 10/02	1	
N37 KMOV 10/04/18 10/04/18 Thu 7-8pm CM Thu 7-8pm1 :30 1 \$2,500.00 PMT 0.00 NI	1 1	\$5,000.00
Big Bang Theory/Young Sheldor		
Start Date         End Date         Weekdays         Spots/Week         Rate         Rating           Week: 10/01/18         10/07/18        1         1 \$2,500.00         0.00		
Spot         Ch         Date Range         Description         Start/End Time         Weekdays         Length         Rate         Rtg         Type           1 KMOV         10/01/18-10/07/18 Thu 7-8pm         Thu 7-8pm         Th         :30(\$2,500.00)         0.00 NI		
See MG 37.2		
[Preempted per Llsa Woods]	,	
2 ⟨MOV 10/01/18-10/07/18 Thu 7-8pm Thu 7-8pm Th :30 \$5,000.00 0.00 NI ⊕ MG for 37.1 10/04	/1	
N38 KMOV 10/06/18 10/06/18 Sat 8-9pm CM Sat 8-9pm1 :30 1 \$1,000.00 PMT 0.00 NM Crimetime Saturday	0	\$0.00
Start Date End Date Weekdays Spots/Week Rate Rating		
Week: 10/01/18 10/07/181- 1 \$1,000.00 0.00		
Spot         Ch         Date Range         Description         Start/End Time         Weekdays         Length         Rate         Rtg         Type           1 'KMOV         10/01/18-10/07/18 Sat 8-9pm         Sat 8-9pm         Sa         :30(\$1,000.00)         0.00 NI	-	
See MG 59.2,59.3 [PROGRAM CHANGE GOD FRIENDED ME (OTO)]		
N39 KMOV 10/06/18 10/06/18 Sa Late News CM Sa Late News1 :30 1 \$1,000.00 PMT 0.00 NI	1 1	\$1,000.00
News 4 @ 10p Saturday		
Start Date         End Date         Weekdays         Spots/Week         Rate         Rating           Week: 10/01/18         10/07/18        1-         1 \$1,000.00         0.00		
N40 KMOV 10/06/18 10/06/18 Sat 10:30-11p News CM Sat 10:30-11p Nev1- :30 1 \$600.00 PMT 0.00 NI	1	\$600.00
News 4 @ 10:30p Saturday Start Date <u>End Date</u> Weekdays <u>Spots/Week</u> Rate Rating		
Week: 10/01/18 10/07/181- 1 \$600.00 0.00	4	
N41 KMOV 10/08/18 10/08/18 M-F Late News CM M-F Late News 1 :30 1 \$1,250.00 PMT 0.00 Nf M-F Late News	1	\$1,250.00
Start Date         End Date         Weekdays         Spots/Week         Rate         Rating           Week: 10/08/18         10/14/18         1         1 \$1,250.00         0.00		
N42 KMOV 10/02/18 10/02/18 M-F Late News CM M-F Late News -1 :30 1 \$1,250.00 PMT 0.00 NM M-F Late News	1	\$1,250.00
Start Date		
Week: 10/01/18         10/07/18         - 1         1 \$1,250.00         0.00           N43 KMOV 10/03/18 10/03/18 M-F Late News         CM         M-F Late News         1         :30         1 \$1,250.00 PMT 0.00 NI	1 1	\$1,250.00
M-F Late News		

Print Date: 10/09/18 16:57:39 Page 5 of 6

Order / Rev: 898464 Advertiser: Josh Hawley For Senate

Alt Order #: 09197759 Product Desc: HAWLEY 4 SENATE KMOV

Ln Ch Start End	Inventory Code Break	Start/End Time Days	Len Spots	Rate Pri Rtg Type	Spots	Amount
Start Date End Date	Weekdays Spots/Week					
Week: 10/01/18 10/07/18		\$1,250.00 0.00				
N44 KMOV 10/04/18 10/04/18	M-F Late News	M-F Late News1	:30 1	\$1,250.00 PMT 0.00 NM	1	\$1,250.00
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 <u>End Date</u>	Weekdays Spots/Week	Rate   Rating   0.00				
N45 KMOV 10/05/18 10/05/18		M-F 5-6am 1	:30 1	\$300.00 PMT 0.00 NM	1	\$300.00
0 5 . 5 . 15 .	News 4 @ 5a			·		
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 <u>End Date</u>	Weekdays Spots/Week	· . — — —				
N46 KMOV 10/05/18 10/05/18	<u> </u>	M-F Late News1	:30 1	\$1,250.00 PMT 0.00 NM	1	\$1,250.00
Start Date End Date	Weekdays Spots/Week					
Week: 10/01/18 10/07/18 N47 KMOV 10/08/18 10/08/18		\$1,250.00 0.00 M-F 10:35p-11:37;1	:30 1	\$350.00 PMT 0.00 NM	1	\$350.00
1447 1000 10700/10 10700/10	Late Show with Stephen Colbe		.50	\$550.001 WIT 0.00 WW	'	ψ550.00
Start Date End Date	Weekdays Spots/Week					
Week: 10/08/18 10/14/18	1 1	7				
N48 KMOV 10/03/18 10/03/18		M-F 10:35p-11:37r 1	:30 1	\$350.00 PMT 0.00 NM	1	\$350.00
Start Date End Date	Late Show with Stephen Colbo Weekdays Spots/Week					
Week: 10/01/18 10/07/18	1 1	· . — —				
N49 KMOV 10/05/18 10/05/18	Colbert CM	M-F 10:35p-11:37r1	:30 1	\$350.00 PMT 0.00 NM	1	\$350.00
	Late Show with Stephen Colbe	ert				
Start Date End Date	Weekdays Spots/Week					
Week: 10/01/18 10/07/18 N50 KMOV 10/02/18 10/02/18	1 1 The Late Late Show CM	\$350.00 0.00 The Late Late Sho - 1	:30 1	\$450,00 DMT, 0.00 NM	4	<b>\$450.00</b>
	James Corden		:30 1	\$150.00 PMT 0.00 NM	1	\$150.00
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 <u>End Date</u>	Weekdays Spots/Week	· <u> </u>				
N51 KMOV 10/03/18 10/03/18	-	The Late Late Sho 1	:30 1	\$150.00 PMT 0.00 NM	1	\$150.00
	James Corden			*		********
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 <u>End Date</u>	Weekdays Spots/Week	· . — — — — — — — — — — — — — — — — — —				
N52 KMOV 10/04/18 10/04/18	The Late Late Show CM James Corden	The Late Late Sho1	:30 1	\$150.00 PMT 0.00 NM	1	\$150.00
Start Date End Date	Weekdays Spots/Week					
Week: 10/01/18 10/07/18	1 1	Ţ:::::::::::::::::::::::::::::::::::::				
N53 KMOV 10/05/18 10/05/18	The Late Late Show CM James Corden	The Late Late Sho 1	:30 1	\$150.00 PMT 0.00 NM	1	\$150.00
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 <u>End Date</u>	Weekdays Spots/Week	· . —				
N54 KMOV 10/07/18 10/07/18	•	NFL Early Game1	:30 1	\$3,750.00 PMT 0.00 NM	1	\$3,750.00
	NFL Early Game					
<u>Start Date</u> <u>End Date</u> Week: 10/01/18 <u>End Date</u>	Weekdays Spots/Week					
Week: 10/01/18 10/07/18 N55 KMOV 10/02/18 10/02/18		\$3,750.00 0.00 M-F 5-6am - 1	:30 1	\$300.00 PMT 0.00 NM	1	\$300.00
1433 1410 4 10/02/10 10/02/10	News 4 @ 5a	(5:30 AM-6:00 AM)	.50	\$500.001 WIT 0.00 NW	'	ψ500.00
Start Date End Date	Weekdays Spots/Week	Rate Rating				
Week: 10/01/18 10/07/18	-1 1	\$300.00 0.00				
N56 KMOV 10/03/18 10/03/18	M-F 5-6am CM News 4 @ 5a	M-F 5-6am 1 (5:30 AM-6:00 AM)	:30 1	\$300.00 PMT 0.00 NM	1	\$300.00
Start Date End Date	Weekdays Spots/Week	Rate Rating				
Week: 10/01/18 10/07/18	1 1	***************************************				
N57 KMOV 10/05/18 10/05/18	M-F 5-6am CM News 4 @ 5a	M-F 5-6am 1 (5:30 AM-6:00 AM)	:30 1	\$300.00 PMT 0.00 NM	1	\$300.00
Start Date End Date	Weekdays Spots/Week	,				
Week: 10/01/18 10/07/18	1 1	· . — — — — — — — — — — — — — — — — — —				
N58 KMOV 10/08/18 10/08/18	CM	M-F 6-7am	:30 1	\$400.00 PMT 0.00 NM	1	\$400.00

Print Date: 10/09/18 16:57:39 Page 6 of 6

Totals

57

\$50,175.00

Order / Rev: 898464 Advertiser: Josh Hawley For Senate

Alt Order #: 09197759 Product Desc: HAWLEY 4 SENATE KMOV

Flight Dates: 10/02/18 - 10/08/18 Estimate: 9872

Break Start/End Time Ln Ch Start End Inventory Code Days Len Spots Rate Pri Rtg Type Spots Amount M-F 6-/am News 4 @ 6a (6:00 AM-6:30 AM) Weekdays Spots/Week Start Date **End Date** Rating Rate Week: 10/08/18 10/14/18 0.00 \$400.00 N59 KMOV 10/06/18 10/06/18 СМ ---S-:30 \$750.00 PMT 0.00 NM Sat 7-8pm Sat 7-8pm 2 \$1,750.00 Crimetime Saturday Weekdays **End Date** Start Date Spots/Week Rate Rating Week: 10/01/18 10/07/18 \$750.00 0.00 1 Start/End Time Spot Ch Date Range Description Weekdays Length Rate Rtg Type 1 KMOV 10/01/18-10/07/18 Sat 7-8pm Sat 7-8pm <del>(\$750.00)</del> 0.00 NM ----Sa--:30 See MG 59.2.59.3 [PROGRAM CHANGE -- THE NEIGHBORHOOD/HAPPY TOGETHER (OTO)] 2 KMOV 10/01/18-10/07/18 Sat 7-8pm ----Sa--:30 \$750.00 0.00 NM Sat 7-8pm MG for 38.1,59.1 3 KMOV 10/01/18-10/07/18 Sat 8-9pm Sat 8-9pm -----Sa--:30 \$1,000.00 0.00 NM MG for 38.1,59.1 N60 KMOV 10/07/18 10/07/18 Sports Sunday СМ :30 \$400.00 PMT 0.00 NM Sports Sunday ----S 1 \$400.00 Sports Sunday Weekdays Spots/Week Rating Start Date **End Date** Rate Week: 10/01/18 10/07/18 \$400.00 0.00 N61 KMOV 10/03/18 10/05/18 The Late Late Sho - - WTF- -:30 \$150.00 PMT 0.00 NM The Late Late Show CM \$150.00 James Corden Weekdays Start Date **End Date** Spots/Week Rating Rate - - WTF- -Week: 10/01/18 10/07/18 \$150.00 0.00 N62 KMOV 10/03/18 10/05/18 M-F 12:37-1:07am M-F 12:37-1:07am - - WTF- -\$100.00 PMT 0.00 NM CM :30 \$100.00 Inside Edition Weekdays Spots/Week Start Date **End Date** Rating Rate - - WTF- -Week: 10/01/18 10/07/18 \$100.00 0.00

# EXHIBIT P

## AGREEMENT FORM FOR POLITICAL CANDIDATE ADVERTISEMENTS

(check applicable box)

FEI	DE	RA	LC	AA:	IDID	ATF

CT	۸.	TE/	10	10	ΑI	~ A	КII	DID	Α	TE
 <b>3</b> 1.	M		L	,,	AL	CA	INI	DID	А	IE

Station and	Location:	Date:	Date:		
, America	n Media &	Advocacy	Group		
•	nalf of: Josh				
a legally qua	lified candidat	e of the Rep	ublican		
political part	y for the office	of: U.S. S	enate	· · · · · · · · · · · · · · · · · · ·	
***************************************	ary Election	<del>*</del>			
election to be	e held on: Au	gust 7th, :	2018		<del></del>
do hereby re	quest station t	ime as follows	<b>3</b> :		
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	sed schedule	with charges (	if available)		

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

### American Media & Advocacy Group

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

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

### Salvatore Purpura

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

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

To Be Signed By	Candidate or Authorized Con	mmittee
	John John	eull
Date	Signature	
To Be Si	gned By Station Representative	
☑ Accepted	☐ Accepted in Part	☐ Rejected
Chris Scott	Chris Scott	N5M
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:

, American Media & Advocacy Group	
(name of federal candidate or authorized committee) hereby certify that the programming to be broadcast (in whole or in part) pursuant to this agreement:	
□ does □ does not	
refer to an opposing candidate (check applicable box). I further certify that for the programming that does refer to an opposing candidate:	те
(check applicable box)	
$\square$ 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.	r
Ju Ferrell, oget Josh Aculy L Serot	
/ signature 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
		100			

Attach p	proposed	schedule	with	charges	(if available)	1

#### 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.

# EXHIBIT Q

# 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:									
Ky	14V S	ninsfi-	eld.m	0 9-6	0-18				
<sub>I.</sub> America	, American Media & Advocacy Group								
being/on beha	alf of: Josh	Hawley fo	r Senate/N	IRSC					
a legally qual	ified candidate	of the Repu	ublican						
political party	for the office	of: U.S. S€	enate						
in the Gene	eral Election	on							
election to be	held on: No	vember 6t	h, 2018						
	quest station t								
Broadcast Day, Days Class Times per Number of Weeks Length Package									
See Schedule See Schedule See Schedule See Schedule See Schedule									
	Co	ndin	ated 1	Buy					

		with char	

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

### American Media & Advocacy Group

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

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

### Salvatore Purpura

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

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

To Be Signed By Candidate or Authorized Committee

Date

Signature

To Be Signed By Station Representative

Accepted

Accepted

Data Data Nester

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:

<sub>ı.</sub> American Media & Advo	cacy Group
(name of federal candidate or authorized co programming to be broadcast (in whole or in	ommittee) hereby certify that the
□ does	☐ does not
refer to an opposing candidate (check approgramming that does refer to an opposing	pplicable box). I further certify that for the grandidate:
(check applicable box)	
☐ the radio programming contains a persolidentifies the candidate, the office being southe broadcast.	onal audio statement by the candidate that ught, and that the candidate has approved
☐ the television programming contains a comparison of the candidate for a duration of at least displayed printed statement identifying the comparison of the broadcast, and that the candidate and/or the the broadcast.	east four seconds, and a simultaneously
John Jaroll, agent	
signature of candidate	or authorized committee
JOSTHAN FERRELL	
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

						S													

#### **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.