

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Complaint of)
)
Campaign Legal Center and Sunlight)
Foundation)
)
Against)
)
Post-Newsweek Stations, Inc., licensee of)
WDIV-TV, Detroit, MI)
)
For Violations of the Communications Act)
§ 315 and FCC Regulation § 73.1212)

To: Enforcement Bureau

COMPLAINT

The Campaign Legal Center and the Sunlight Foundation file this complaint regarding violations of the Communications Act and the Federal Communications Commission’s (“FCC”) regulations by Post-Newsweek Stations, Inc., licensee of WDIV-TV. In January 2014, WDIV-TV ran a political ad sponsored by Americans for Prosperity (“AFP”). The station failed to disclose in its online political file information about AFP and the ad as required by the Communications Act and the FCC’s regulations.

I. Facts

A. Parties

The Campaign Legal Center is a nonpartisan, nonprofit organization that promotes awareness and enforcement of political broadcasting laws. The Campaign Legal Center’s mission is to represent the public interest in the enforcement of media and campaign laws. Through public education, advocacy for federal rulemaking proceedings, and congressional

action, the Campaign Legal Center seeks to shape political broadcasting policies and promote effective enforcement of the public interest obligations of the media.¹

The Sunlight Foundation is a nonpartisan nonprofit that advocates for open government globally and uses technology to make government more accountable to all. Sunlight accomplishes these goals at municipal, federal, and international levels by building tools that empower democratic participation and by working with policymakers and civil society organizations to employ a technology-centric and transparency-oriented approach to their work. The Sunlight Foundation has built tools that empower individuals and journalists to better and more easily understand political spending across the United States, which depend on data found within broadcast stations' political files and elsewhere.²

WDIV-TV is an NBC-affiliated broadcast television station in Detroit, Michigan. Detroit is the eleventh largest Designated Market Area, serving more than 1.8 million households.³ Post-Newsweek Stations, also headquartered in Detroit, is the licensee of WDIV-TV, and is wholly owned by the Graham Holdings Company. The Graham Holdings Company, formerly the Washington Post Company,⁴ is headquartered in Washington, D.C., and is a conglomerate that deals in media, broadcast, educational, and healthcare services.⁵

¹ See Campaign Legal Center, <http://www.campaignlegalcenter.org> (last visited Apr. 2, 2014).

² For instance, Political Ad Sleuth and Ad Hawk are two such tools. See Political Ad Sleuth, <http://politicaladsleuth.com> (a searchable database created from FCC online public file documents); Ad Hawk, <http://adhawk.sunlightfoundation.com> (a mobile app allowing identification of political ads).

³ *Local Television Market Universe Estimates*, The Nielsen Company, (2013), http://www.tvb.org/media/file/TVB_Market_Profiles_Nielsen_TVHH_DMA_Ranks_2013-2014.pdf.

⁴ Debbi Wilgoren, *Washington Post Co. Renamed Graham Holdings Company to Mark Sale of Newspaper*, WashPost (Nov. 18, 2013), http://www.washingtonpost.com/business/washington-post-co-renamed-graham-holdings-company-to-mark-sale-of-newspaper/2013/11/18/57fbc7fe-5060-11e3-9e2c-e1d01116fd98_story.html.

⁵ Graham Holdings Company, Our Company, <http://www.ghco.com/phoenix.zhtml?c=62487&p=irol-ourcompanyprofile> (last visited Apr. 2, 2014).

B. The Advertisement

In January 2014, WDIV-TV broadcast a political ad sponsored by AFP. AFP is a 501(c)(4) social welfare group headquartered in Arlington, Virginia, that promotes limited government involvement and free economic markets at the local, state, and federal levels.⁶ Although AFP does not disclose its donors, it is known to be closely associated with David and Charles Koch.⁷

The AFP ad, transcribed below, refers to U.S. Representative Gary Peters (D-MI). Peters is a candidate for the 2014 U.S. Senate seat in Michigan.⁸ Since 2008, Peters has served in the U.S. House of Representatives for Detroit's 14th congressional district. As a Representative, Peters supported the Affordable Care Act. The AFP ad discusses the burdens imposed by the Affordable Care Act, and urges voters to "call Gary Peters and tell him Obamacare isn't working."⁹

[Narrator:] They told us the lie of the year.

[Obama:] "If you like your health care plan, you'll be able to keep your health care plan."

[Narrator:] And Congressman Gary Peters kept telling it.

[Peters:] "The Affordable Care Act bars cancellation of insurance policies."

[Narrator:] The truth is 225,000 Michiganders have had their insurance cancelled. Families are losing their doctors and health

⁶ Americans for Prosperity, Our Missions, <http://americansforprosperity.org/about/about-americans-for-prosperity> (last visited Apr. 8, 2014).

⁷ E.g., Pema Levy, *Money In Politics: The Companies Behind David Koch's Americans For Prosperity*, Int'l Bus. Times (Sept. 24, 2013), <http://www.ibtimes.com/money-politics-companies-behind-david-kochs-americans-prosperity-1410408>.

⁸ Sean Sullivan, *Gary Peters Announces Michigan Senate Campaign*, Wash. Post (May 1, 2013), <http://www.washingtonpost.com/blogs/post-politics/wp/2013/05/01/gary-peters-announces-michigan-senate-campaign>.

⁹ Chad Livengood, *Conservative Group Launches Health Care Ad Against Rep. Peters* (Jan. 14, 2014), attached in Appendix A (originally run in Detroit News).

care costs are skyrocketing. Call Congressman Peters and tell him Obamacare isn't working, it's hurting Michigan families.

The ad discloses on-air that it is “Paid for by Americans for Prosperity.”¹⁰

Target Enterprises purchased the airtime for this ad on AFP's behalf at several Detroit stations, including WDIV-TV.¹¹ Target Enterprises is a media placement agency based in Los Angeles, California, that provides advertising placement for companies, ballot initiatives, political campaigns, and advocacy groups.¹²

II. Argument

The AFP ad triggers WDIV-TV's political file disclosure requirements set forth in the Communications Act and the FCC's regulations. WDIV-TV, however, has failed to disclose the required information.

A. The Communications Act and the FCC's regulation requirements.

When broadcasters run political ads, they must meet specific disclosure requirements set forth in the Communications Act and the FCC's regulations.

Section 315(e)(1) of the Communications Act requires that broadcast licensees maintain records regarding any request to purchase broadcast time that “communicates a message relating to any political matter of national importance, including (i) a legally qualified candidate; (ii) any election to Federal office; or (iii) a national legislative issue of public importance.”¹³

For such requests, the licensee must disclose “the name of the candidate to which the communication refers and the office to which the candidate is seeking election, the election to

¹⁰ *Id.* The ad was embedded in the article, and can also be viewed on YouTube: <https://www.youtube.com/watch?v=IsLdhwwSwrQ>.

¹¹ See Robert Maguire, *Americans for Prosperity Helped Churn Koch-Linked Money*, Open Secrets (Nov. 15, 2013), <http://www.opensecrets.org/news/2013/11/americans-for-prosperity-helped-churn-koch-linked-money.html>; Americans for Prosperity, 2012 Cycle, <https://reporting.sunlightfoundation.com/outside-spending-2012/committee/americans-for-prosperity/C30001051/> (last visited Apr. 4, 2014).

¹² See Target Enterprises, <http://www.targetla.com> (last visited Apr. 2, 2014).

¹³ 47 USC § 315(e)(1)(B)(i)–(iii) (2014).

which the communication refers, or the issue to which the communication refers (as applicable).”¹⁴ The licensee must also disclose a list of the purchaser’s “chief executive officers or members of the executive committee or of the board of directors.”¹⁵ Moreover, this information “shall be placed in a political file as soon as possible.”¹⁶

Similarly, FCC regulations require licensees to disclose information about paid broadcasts if those broadcasts concern a “political matter” or discuss a “controversial issue of public importance,” and the ad is paid for by “a corporation, committee, association or other unincorporated group, or other entity.”¹⁷ In such cases, the FCC also requires a “list of the chief executive officers or members of the executive committee or of the board of directors, committee association or other unincorporated group or other entity.”¹⁸ This information must be placed in the public file “as soon as possible, [meaning] immediately absent unusual circumstances.”¹⁹

If the group purchasing the time is an “agent or other person or entity [that] contracts or otherwise makes arrangements with a station on behalf of another,” a list of the chief executive officers or board of directors of the “entity [] paying for or furnishing the broadcast matter” must be “available for public inspection” in a station’s online political file.²⁰

¹⁴ *Id.* § 315(e)(2)(E).

¹⁵ *Id.* § 315(e)(2)(G).

¹⁶ *Id.* § 315(e)(3).

¹⁷ 47 CFR § 73.1212(e). *See also id.* § 73.1943. Currently, a station in the top-50 designated market areas and affiliated with a top-four network must upload its political file to the FCC’s online database; however, all television stations will be required to do so beginning in July 2014. *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Second Report and Order, 27 FCC Rcd 4535, 4536–37 (2012).

¹⁸ 47 CFR § 73.1212(e).

¹⁹ *Id.* § 73.1943(c).

²⁰ *Id.* § 73.1212(e).

B. The AFP ad triggers the disclosure requirements of § 315(e)(2) of the Communications Act and § 73.1212(e) of the FCC’s regulations.

The AFP ad triggers the disclosure requirements of § 315(e)(2) of the Communications Act and § 73.1212(e) of the FCC’s regulations for two reasons. First, the ad references Rep. Peters, a “legally qualified candidate” for the U.S. Senate. He publicly announced his Senate candidacy in May 2013 and maintains a campaign website, collects donations, provides regular updates and press releases, and raised over \$3.4 million for his campaign.²¹

Second, the ad communicates a message relating to both a “national legislative issue of public importance” and a “controversial issue of public importance” for purposes of the Communications Act and the FCC’s regulations. The ad is entirely about the Affordable Care Act, a federal law, Peters’ support of it, and the complaints of citizens that it is not working. The Affordable Care Act is also the quintessential legislative and controversial issue of public importance. It was President Obama’s key initiative and has been the subject of nationwide debate and court challenges, including at the Supreme Court.

C. WDIV-TV failed to disclose the information required by law.

WDIV-TV disclosed the following regarding the sale of airtime for the ad: three contracts, which disclose rates, dates, and times in compliance with section 315(e)(2)(A)-(D);²² and three Supplemental Forms. Copies are included in Exhibit B.

The Supplemental Forms provide the space for the stations to disclose the information required by the Communications Act and the Commission’s regulations. They prompt the station to disclose purchaser information, the top officers or board of directors, the candidate referred to,

²¹ See Peters for Michigan, <http://www.petersformichigan.com/> (last visited Apr. 16, 2014); Open Secrets, <http://www.opensecrets.org/politicians/summary.php?cid=N00029277> (last visited Feb. 26, 2014); Todd Spangler, *U.S. Rep. Gary Peters Raised More Than \$1M in Last Quarter for Senate Run*, Detroit Free Press (Jan. 23, 2014), <http://www.freep.com/article/20140123/NEWS06/301230082/rep-gary-peters-fundraising-senate-run>.

²² See Section II.D below for a discussion of the untimeliness of the contract disclosure.

and the issue referred to. The three uploaded forms are identical except for the contract number, and cover three weeks in January 2014.

The candidate and issue portions of each form are either left blank or filled in incorrectly. First, the candidate section is left blank, even though the ad clearly refers to Representative Peters.²³ Second, the station incorrectly identified the issue as “Americans for Prosperity.” The ad does not even mention AFP other than in its on-air disclosure, and in any event, AFP is merely the purchaser.

The station also failed to disclose the top officers or members of the board of directors. As an initial matter, the form incorrectly identified Target Enterprises, instead of AFP, as the purchaser. Target Enterprises purchased the time on behalf of AFP, and thus is an agent. The disclosure laws require a list of the original purchaser’s officers or board of directors. But the station simply ignored question 2, which seeks officer and director information. Thus, WDIV-TV repeatedly failed to comply with the disclosure laws.

D. WDIV-TV failed to disclose the information in a timely manner.

WDIV-TV also failed to timely disclose the information required by § 315(e)(2). The Communications Act requires stations to disclose the rates charged, the date and time on which the communication aired, and the class of time purchased.²⁴ This information must be placed in the public file “as soon as possible.”²⁵ The Commission interprets “as soon as possible” to mean “immediately absent extraordinary circumstances.”²⁶ Stations typically upload the order contracts to comply with these provisions.

²³ The Order form for contract number 309786 lists “Anti-Peters Senate Race” under the section “Estimate.” The other two contracts do not include this language.

²⁴ 47 USC § 315(e)(2).

²⁵ *Id.* § 315(e)(3).

²⁶ 47 CFR § 73.1943(c)

WDIV-TV uploaded the three Supplemental Forms discussed above on January 17, 2014. The orders associated with these Supplemental Forms indicate that the ads ran at various dates and times between January 13 and February 9, 2014. However, the orders associated with the Supplements, which show the rates charged, the dates and times on which the ads aired, and the class of time purchased, were not uploaded until April 1, 2014.²⁷ By waiting two months or more to place this information in the public file, WDIV-TV failed to comply with § 315's requirement of making this information public as soon as possible.

Conclusion

The Communications Act and FCC rules are intended to inform the public about the amount of spending and source of funding when broadcast stations air paid programming concerning candidates, elections, and political matters of public importance. WDIV-TV has failed to disclose this important information. Thus, the Campaign Legal Center and the Sunlight Foundation respectfully request that the FCC take prompt action to ensure that this information is made available to the public through WDIV-TV's public file. We further request that the FCC take other measures, such as assessing forfeitures and issuing a Public Notice reminding broadcast stations of their obligations, to ensure that this and other broadcast stations include all of the legally required disclosures in the future.

²⁷ See FCC, WDIV-TV, https://stations.fcc.gov/station-profile/wdiv-tv/political-files/browse-%3E2014-%3Enon-candidate_issue_ads (last visited Apr. 20, 2014). Nor does it appear that the orders filed on April 1 are updates of earlier orders. CLC's researcher checked the station's political files frequently before April 1 and never saw any orders associated with the Supplemental Forms.

Respectfully submitted,

Of counsel:

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Dated: May 1, 2014

*Counsel for Campaign Legal Center
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Exhibit A

The screen capture below is of a *Detroit News* article, which has since been removed from its website. The full article is reproduced in full below.

The screenshot shows a news article from The Detroit News. The page header includes the site logo, the main section 'Politics+Government', and a sub-section 'Politics-National'. A navigation bar lists various news categories. Below this, there are trending topics and breadcrumb navigation. The article's publication date is January 14, 2014, at 3:13 PM. The main headline is 'Conservative group launches health care ad against Rep. Peters', with the author 'CHAD LIVENGOOD' and '39 COMMENTS' noted. A video player is embedded in the article, showing a man speaking at a podium. The video's title is 'Tell Gary Peters: Obamacare Isn't Working'. The video content features a man in a suit speaking, with a blue background and white text that reads: 'U.S. CONGRESSMAN GARY PETERS', 'OBAMACARE ISN'T WORKING', 'IT'S HURTING MICHIGAN FAMILIES', and '(202) 225-5802'. At the bottom of the video frame, it says 'PAID FOR BY AMERICANS FOR PROSPERITY'. The video player interface includes a play button, volume control, a progress bar at 0:31 / 0:34, and social media sharing options for Facebook (97 recommendations) and Twitter (0 tweets).

Conservative group launches health care ad against Rep. Peters

Chad Livengood, The Detroit News

January 14, 2014, at 3:13 PM

Lansing — The conservative political group Americans for Prosperity is launching a \$1 million, three-week statewide advertising campaign in Michigan targeting Democratic U.S. Rep. Gary Peters for his support of the new federal health care law.

The ad shows a video clip of President Barack Obama’s debunked claim to voters that “if you like your health care plan, you’ll be able to keep your health care plan” under the Affordable Care Act.

AFP President Tim Phillips said the ad is not meant to hinder Peters’ campaign for the U.S. Senate, although he acknowledges his group isn’t targeting any other Michigan politician who has supported Obama’s health care law in any way, which includes Gov. Rick Snyder, a Republican.

“We don’t have electoral intent with this ad,” Phillips told reporters. “It’s a long-term effort to repeal Obamacare, and that necessarily involves moving the public further and further our way on this issue of Obamacare. ... We think the only way to see the eventual repeal of this law is to keep it on the very front burner for Americans.”

The ad was to begin airing on broadcast and cable television stations Tuesday evening, Phillips said.

Phillips said AFP paid for the ad through its not-for-profit 501(c)4 organization, which does not have to disclose the donors of “issue ads” educating voters on political candidates without telling them whom to vote for.

The Americans for Prosperity ad urges voters to “call Gary Peters and tell him Obamacare isn’t working, it’s hurting Michigan families.”

Peters, D-Bloomfield Township, voted in November with Michigan’s nine Republicans in favor of a bill that would have allowed insurers to continue offering canceled health plans to millions of Americans.

An estimated 225,000 Michiganians received cancellation notices late last year because their plans didn’t cover required essential benefits under Obamacare, such as hospitalization, mental health, maternity and prescription drug coverage.

As part of its \$1 million ad buy, AFP also will air about \$75,000 in radio ads in markets across the state as well as buy online advertising targeting Peters for his vote and continued support of Obamacare, Phillips said.

Phillips and AFP's Michigan state director, Scott Hagerstrom, unveiled the ad Tuesday at a press conference outside of the state Capitol. The group planned to hold its press conference inside the Capitol, but was told to leave after House Speaker Jase Bolger's office learned they planned to unveil the Peters ad, Bolger spokesman Ari Adler said.

Earlier in the day, Michigan Democratic Party Chairman Lon Johnson attempted to step on the group's message by drawing attention to an August video clip of Peters' likely opponent, Republican Terri Lynn Land, in which the former secretary of state indicates her campaign has been in talks with outside groups.

"Our campaign has talked to a lot of those folks. They're committed to Michigan," Land said of super political action committees at a Leelanau County Republican women's event in August. It's illegal for candidates to coordinate with third-party groups, such as Super PACs or groups like Americans for Prosperity.

"You've got Terri Lynn Land admitting her campaign has communicated with Super PACs and now you've got proof of it with this Americans for Prosperity TV ad," Johnson said.

Asked which outside groups the Land campaign has been in contact with, Land's political adviser John Yob sent a statement to The Detroit News saying: "This is nothing more than a desperate attempt by dishonest Democrats to shift attention away from the fact that their candidates for statewide office are failing in the polls after being dishonest with voters and claiming Michiganders could keep their insurance if they liked it."

Johnson said the Democratic Party is giving "strong consideration" to filing a complaint against the Land campaign with the Federal Election Commission.

Exhibit B

SUPPLEMENT TO CONTRACT FOR ISSUE ADVERTISING

(The Ad is Political, Relates to an Issue of Public Importance,
or Refers to But is Not Authorized by a Candidate)

CONTRACT NO. 309102

1. THE CONTACT PERSON FOR THE PURCHASER IS:

Kym Mason – Target Enterprises
Name

15260 Ventura Blvd, Suite 1240, Sherman Oaks, CA 91403
Address

810-905-0005
Phone Number

2. THE TOP OFFICERS OR THE MEMBERS OF THE BOARD OF DIRECTORS OF THE PURCHASER ARE:



3. IF THE AD REFERS TO A CANDIDATE:



a. The name of the candidate is _____.



b. The candidate seeks election to the office of _____ in
the Primary Election, General Election, or Special Election.

4. IF THE AD REFERS TO AN ISSUE:



a. The issue is Americans for Prosperity.



b. The Purchaser is Target Enterprises.

NOTE: If the ad relates to an issue of state or local (not national) importance and does not refer to a candidate, only this Form should be filed in the Political File. Do not file the Order.

This form was uploaded to WDIV-TV's online political file on Jan. 17, 2014, at 11:32 AM; available at [https://stations.fcc.gov/collect/files/53114/Political%20File/2014/Non-Candidate%20Issue%20Ads/01142014-1%20\(13899767455952\).pdf](https://stations.fcc.gov/collect/files/53114/Political%20File/2014/Non-Candidate%20Issue%20Ads/01142014-1%20(13899767455952).pdf).

ORDER



Orders
Order / Rev: 309102
 Alt Order #: 06969576
 Product Desc: 735 AM 4 PROSPERITY
 Estimate: 1Q14
 Flight Dates: 01/14/14 - 01/20/14
 Original Date / Rev: 04/01/14 / 04/01/14
 Order Type: GENERAL

Primary AE: Maria Casey
 Sales Office: LAX
 Sales Region: NAT

Agency Name: Target Enterprises LTD
 Buying Contact:
 Billing Contact:
 15260 Ventura Blvd Ste 1240
 Sherman Oaks, CA 91403

Billing Type: Cash
 Billing Calendar: Broadcast
 Billing Cycle: EOM/EOC
 Agency Commission: 15%

Advertiser Name: ISS/Americans for Prosperity
 Demographic: A35+
 Product Codes: PL-Non-Ballot-Related
 Priority: P-2
 Revenue Codes: AGY, P OL, ISSUE

NewBusiness Thru:
 Order Separation: 00:15:00
 Advertiser External ID:
 Agency External ID:

Bill Plan

Start Date	End Date	# Spots	Gross Amount	Net Amount
12/30/13	01/20/14	21	\$29,900.00	\$25,415.00

Totals

Month	# Spots	Gross Amount	Net Amount	Rating
January 2014	21	\$29,900.00	\$25,415.00	0.00
Totals	21	\$29,900.00	\$25,415.00	0.00

Account Executives

Account Executive	Sales Office	Sales Region	Start Date / End Date	Order %
Maria Casey			Start Of Order - End Of Order	100%

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
1	WDIV	01/15/14	01/17/14	7-9am Today ShowM-FCM Today Show		7-9a	--WTF--	:30	4	\$900.00	P-2	0.00	NM	4	\$3,600.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		01/13/14	01/19/14	--WTF--					4	\$900.00		0.00			
2	WDIV	01/20/14	01/20/14	7-9am Today ShowM-FCM Today Show		7-9a	1-----	:30	1	\$900.00	P-2	0.00	NM	1	\$900.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		01/20/14	01/26/14	1-----					1	\$900.00		0.00			
3	WDIV	01/15/14	01/17/14	6-7am Local 4 News M-FCM Local 4 News Today @ 6A		630A-7A (6:30 AM-7:00 AM)	--WTF--	:30	3	\$900.00	P-2	0.00	NM	3	\$2,700.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		01/13/14	01/19/14	--WTF--					3	\$900.00		0.00			
4	WDIV	01/20/14	01/20/14	6-7am Local 4 News M-FCM Local 4 News Today @ 6A		630A-7A (6:30 AM-7:00 AM)	1-----	:30	1	\$900.00	P-2	0.00	NM	1	\$900.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		01/20/14	01/26/14	1-----					1	\$900.00		0.00			
5	WDIV	01/15/14	01/17/14	6-630pm Local 4 News MCM M-F Local 4 News 6-630pm		6P-630P	--WTF--	:30	3	\$1,300.00	P-2	0.00	NM	3	\$3,900.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		01/13/14	01/19/14	--WTF--					3	\$1,300.00		0.00			
6	WDIV	01/20/14	01/20/14	6-630pm Local 4 News MCM M-F Local 4 News 6-630pm		6P-630P	1-----	:30	1	\$1,300.00	P-2	0.00	NM	1	\$1,300.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
Week:		01/20/14	01/26/14	1-----					1	\$1,300.00		0.00			

Order / Rev: 309102
 Alt Order #: 06969576
 Flight Dates: 01/14/14 - 01/20/14

Advertiser: ISS/Americans for Prosperity
 Product Desc: 735 AM 4 PROSPERITY
 Estimate: 1Q14
WDIV

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
7	WDIV	01/15/14	01/17/14	M-F Local 4 News @11P 11-1135P Late News	CM	11P-1135P	--WTF--	:30	3	\$2,500.00	P-2	0.00	NM	3	\$7,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/13/14	01/19/14	--WTF--		3				\$2,500.00		0.00			
	<u>Spot</u>	<u>Ch</u>	<u>Date Range</u>	<u>Description</u>		<u>Start/End Time</u>	<u>Weekdays</u>	<u>Length</u>		<u>Rate</u>		<u>Rtg</u>	<u>Type</u>		
	1	WDIV	01/13/14-01/19/14	M-F Local 4 News @11P		11P-1135P	--WThF----	:30		(\$2,500.00)		0.00	NM		
				See MG 7.4											
	4	WDIV	01/14/14-01/14/14	M-F Local 4 News @11P		11P-1135P	-T-----	:30		\$2,500.00		0.00	NM		
				MG for 7.1 01/17											
8	WDIV	01/20/14	01/20/14	M-F Local 4 News @11P 11-1135P Late News	CM	11P-1135P	1-----	:30	1	\$2,500.00	P-2	0.00	NM	1	\$2,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/20/14	01/26/14	1-----		1				\$2,500.00		0.00			
9	WDIV	01/19/14	01/19/14	Sun Local News 4 @11P Sun 11-1135P Late News	CM	11-1135P	-----1	:30	1	\$1,900.00	P-2	0.00	NM	1	\$1,900.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/13/14	01/19/14	-----1		1				\$1,900.00		0.00			
10	WDIV	01/15/14	01/17/14	6-7am Local 4 News M-RCM Local 4 News Today @ 6A	CM	6A-630A (6:00 AM-6:30 AM)	--WTF--	:30	1	\$900.00	P-2	0.00	NM	1	\$900.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/13/14	01/19/14	--WTF--		1				\$900.00		0.00			
11	WDIV	01/15/14	01/17/14	630-7p NBC Nightly News NBC Nightly News	GM	630-7p	--WTF--	:30	1	\$1,300.00	P-2	0.00	NM	1	\$1,300.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/13/14	01/19/14	--WTF--		1				\$1,300.00		0.00			
12	WDIV	01/18/14	01/18/14	Sat Local 4 News @ 11P Sat 11-1130P Late News	CM	11-1130P	-----1-	:30	1	\$2,500.00	P-2	0.00	NM	1	\$2,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/13/14	01/19/14	-----1-		1				\$2,500.00		0.00			
													Totals	21	\$29,900.00

SUPPLEMENT TO CONTRACT FOR ISSUE ADVERTISING

(The Ad is Political, Relates to an Issue of Public Importance,
or Refers to But is Not Authorized by a Candidate)

CONTRACT NO. 309786

1. THE CONTACT PERSON FOR THE PURCHASER IS:

Kym Mason – Target Enterprises
Name

15260 Ventura Blvd, Suite 1240, Sherman Oaks, CA 91403
Address

810-905-0005
Phone Number

2. THE TOP OFFICERS OR THE MEMBERS OF THE BOARD OF DIRECTORS OF THE PURCHASER ARE:



3. IF THE AD REFERS TO A CANDIDATE:



a. The name of the candidate is _____.



b. The candidate seeks election to the office of _____ in
the Primary Election, General Election, or Special Election.

4. IF THE AD REFERS TO AN ISSUE:



a. The issue is Americans for Prosperity.



b. The Purchaser is Target Enterprises.

NOTE: If the ad relates to an issue of state or local (not national) importance and does not refer to a candidate, only this Form should be filed in the Political File. Do not file the Order.

This form was uploaded to WDIV-TV's online political file on Jan. 17, 2014, at 2:49 PM; available at [https://stations.fcc.gov/collect/files/53114/Political%20File/2014/Non-Candidate%20Issue%20Ads/01172014-1%20\(13899882997436\).pdf](https://stations.fcc.gov/collect/files/53114/Political%20File/2014/Non-Candidate%20Issue%20Ads/01172014-1%20(13899882997436).pdf).

ORDER



Orders
Order / Rev: 309786
Alt Order #: 07028636
Product Desc: 755 AM 4 PROSPERITY
Estimate: 755 (ANTI-PETERS SENATE RACE)
Flight Dates: 01/21/14 - 01/27/14
Original Date / Rev: 04/01/14 / 04/01/14
Order Type: GENERAL

Primary AE: Maria Casey
Sales Office: LAX
Sales Region: NAT

Agency Name: Target Enterprises LTD
Buying Contact:
Billing Contact:
 15260 Ventura Blvd Ste 1240
 Sherman Oaks, CA 91403

Billing Type: Cash
Billing Calendar: Broadcast
Billing Cycle: EOM/EOC
Agency Commission: 15%

Advertiser Name: ISS/Americans for Prosperity
Demographic: A35+
Product Codes: PL-Non-Ballot-Related
Priority: P-2
Revenue Codes: AGY, P, OL, ISSUE

NewBusiness Thru:
Order Separation: 00:15:00
Advertiser External ID:
Agency External ID:

Bill Plan

Start Date	End Date	# Spots	Gross Amount	Net Amount
12/30/13	01/26/14	20	\$28,400.00	\$24,140.00
01/27/14	01/27/14	4	\$5,700.00	\$4,845.00

Totals

Month	# Spots	Gross Amount	Net Amount	Rating
January 2014	20	\$28,400.00	\$24,140.00	0.00
February 2014	4	\$5,700.00	\$4,845.00	0.00
Totals	24	\$34,100.00	\$28,985.00	0.00

Account Executives

Account Executive	Sales Office	Sales Region	Start Date / End Date	Order %
Maria Casey			Start Of Order - End Of Order	100%

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
1	WDIV	01/21/14	01/24/14	Inside Edition 430-5P M-EM Inside Edition M-F 430-5p	M-EM	TU-F 430p-5p	-1111--	:30	4	\$900.00	P-2	0.00	NM	4	\$3,600.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
Week:		01/20/14	01/26/14	-1111--		4				\$900.00		0.00			
2	WDIV	01/27/14	01/27/14	Inside Edition 430-5P M-EM Inside Edition M-F 430-5p	M-EM	MON 430p-5p	1-----	:30	1	\$900.00	P-2	0.00	NM	1	\$900.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
Week:		01/27/14	02/02/14	1-----		1				\$900.00		0.00			
3	WDIV	01/21/14	01/24/14	6-630pm Local 4 News MCM M-F Local 4 News 6-630pm	MCM	TU-F 6P-630P	-1111--	:30	4	\$1,400.00	P-2	0.00	NM	4	\$5,600.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
Week:		01/20/14	01/26/14	-1111--		4				\$1,400.00		0.00			
4	WDIV	01/27/14	01/27/14	6-630pm Local 4 News MCM M-F Local 4 News 6-630pm	MCM	MON 6P-630P	1-----	:30	1	\$1,400.00	P-2	0.00	NM	1	\$1,400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
Week:		01/27/14	02/02/14	1-----		1				\$1,400.00		0.00			
5	WDIV	01/21/14	01/24/14	5-6pm Local 4 News M-FCM M-F Local 4 News 5-6pm	M-FCM	TU-F 5P-6P	-1111--	:30	4	\$1,200.00	P-2	0.00	NM	4	\$4,800.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
Week:		01/20/14	01/26/14	-1111--		4				\$1,200.00		0.00			
6	WDIV	01/27/14	01/27/14	5-6pm Local 4 News M-FCM M-F Local 4 News 5-6pm	M-FCM	MON 5P-6P	1-----	:30	1	\$1,200.00	P-2	0.00	NM	1	\$1,200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
Week:		01/27/14	02/02/14	1-----		1				\$1,200.00		0.00			

Order / Rev: 309786
 Alt Order #: 07028636
 Flight Dates: 01/21/14 - 01/27/14

Advertiser: ISS/Americans for Prosperity
 Product Desc: 755 AM 4 PROSPERITY
 Estimate: 755 (ANTI-PETERS SENATE RACE)
WDIV

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
6	WDIV	01/27/14	01/27/14	5-6pm Local 4 News M-F M-F Local 4 News 5-6pm	CM	MON 5P-6P	1-----	:30	1	\$1,200.00	P-2	0.00	NM	1	\$1,200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/27/14	02/02/14	1-----		1				\$1,200.00		0.00			
7	WDIV	01/21/14	01/24/14	M-F Local 4 News @11P 11-1135P Late News	CM	TU-F 11P-1135P	-1111--	:30	4	\$2,450.00	P-2	0.00	NM	4	\$9,800.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/20/14	01/26/14	-1111--		4				\$2,450.00		0.00			
8	WDIV	01/27/14	01/27/14	M-F Local 4 News @11P 11-1135P Late News	CM	MON 11P-1135P	1-----	:30	1	\$2,200.00	P-2	0.00	NM	1	\$2,200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/27/14	02/02/14	1-----		1				\$2,200.00		0.00			
9	WDIV	01/24/14	01/24/14	Wheel of Fortune 7-730p M-F Wheel of Fortune	CM	7P-730P	----F--	:30	1	\$1,800.00	P-2	0.00	NM	1	\$1,800.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/20/14	01/26/14	----F--		1				\$1,800.00		0.00			
10	WDIV	01/24/14	01/24/14	Jeopardy 730-8p M-F Jeopardy	CM	730P-8P	----F--	:30	1	\$1,800.00	P-2	0.00	NM	1	\$1,800.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/20/14	01/26/14	----F--		1				\$1,800.00		0.00			
11	WDIV	01/25/14	01/25/14	Sat Wheel 730-8PM Wheel of Fortune	CM	730P-8P	-----S-	:30	1	\$350.00	P-2	0.00	NM	1	\$350.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/20/14	01/26/14	-----S-		1				\$350.00		0.00			
12	WDIV	01/26/14	01/26/14	Sports Final Ed 1130-12M Sports Final Edition	CM	1135P-12M	-----S	:30	1	\$650.00	P-2	0.00	NM	1	\$650.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/20/14	01/26/14	-----S		1				\$650.00		0.00			
													Totals	24	\$34,100.00

SUPPLEMENT TO CONTRACT FOR ISSUE ADVERTISING

(The Ad is Political, Relates to an Issue of Public Importance,
or Refers to But is Not Authorized by a Candidate)

CONTRACT NO. 309809

1. THE CONTACT PERSON FOR THE PURCHASER IS:

Kym Mason – Target Enterprises
Name



15260 Ventura Blvd, Suite 1240, Sherman Oaks, CA 91403
Address

810-905-0005
Phone Number



2. THE TOP OFFICERS OR THE MEMBERS OF THE BOARD OF DIRECTORS OF THE PURCHASER ARE:

 _____

3. IF THE AD REFERS TO A CANDIDATE:

-  a. The name of the candidate is _____.
-  b. The candidate seeks election to the office of _____ in the Primary Election, General Election, or Special Election.

4. IF THE AD REFERS TO AN ISSUE:

-  a. The issue is Americans for Prosperity.
-  b. The Purchaser is Target Enterprises.

NOTE: If the ad relates to an issue of state or local (not national) importance and does not refer to a candidate, only this Form should be filed in the Political File. Do not file the Order.

This form was uploaded to WDIV-TV's online political file on Jan. 17, 2014, at 2:58 PM; available at [https://stations.fcc.gov/collect/files/53114/Political%20File/2014/Non-Candidate%20Issue%20Ads/01172014-2%20\(13899890195320\).pdf](https://stations.fcc.gov/collect/files/53114/Political%20File/2014/Non-Candidate%20Issue%20Ads/01172014-2%20(13899890195320).pdf).

ORDER



Orders
Order / Rev: 309809
Alt Order #: 07028668
Product Desc: 756 AM 4 PROSPERITY
Estimate: 756
Flight Dates: 01/28/14 - 02/03/14
Original Date / Rev: 04/01/14 / 04/01/14
Order Type: GENERAL

Primary AE: Maria Casey
Sales Office: LAX
Sales Region: NAT

Agency Name: Target Enterprises LTD
Buying Contact:
Billing Contact:
 15260 Ventura Blvd Ste 1240
 Sherman Oaks, CA 91403

Billing Type: Cash
Billing Calendar: Broadcast
Billing Cycle: EOM/EOC
Agency Commission: 15%

Advertiser Name: ISS/Americans for Prosperity
Demographic: A35+
Product Codes: PL-Non-Ballot-Related
Priority: P-2
Revenue Codes: AGY, P, OL, ISSUE

NewBusiness Thru:
Order Separation: 00:15:00
Advertiser External ID:
Agency External ID:

Bill Plan

Start Date	End Date	# Spots	Gross Amount	Net Amount
01/27/14	02/03/14	25	\$32,750.00	\$27,837.50

Totals

Month	# Spots	Gross Amount	Net Amount	Rating
February 2014	25	\$32,750.00	\$27,837.50	0.00
Totals	25	\$32,750.00	\$27,837.50	0.00

Account Executives

Account Executive	Sales Office	Sales Region	Start Date / End Date	Order %
Maria Casey			Start Of Order - End Of Order	100%

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
1	WDIV	01/28/14	01/31/14	Inside Edition 430-5P M-EM Inside Edition M-F 430-5p		430p-5p	-1111--	:30	4	\$900.00	P-2	0.00	NM	4	\$3,600.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/27/14	02/02/14	-1111--		4				\$900.00		0.00			
2	WDIV	01/28/14	01/31/14	6-630pm Local 4 News M-F M-F Local 4 News 6-630pm	M	6P-630P	-1111--	:30	4	\$1,500.00	P-2	0.00	NM	4	\$6,000.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/27/14	02/02/14	-1111--		4				\$1,500.00		0.00			
3	WDIV	01/28/14	01/31/14	5-6pm Local 4 News M-F M-F Local 4 News 5-6pm	M	530P-6P (5:30 PM-6:00 PM)	-1111--	:30	4	\$1,300.00	P-2	0.00	NM	4	\$5,200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/27/14	02/02/14	-1111--		4				\$1,300.00		0.00			
4	WDIV	01/28/14	01/31/14	M-F Local 4 News @11P 11-1135P Late News	M	11P-1135P	-1111--	:30	4	\$2,200.00	P-2	0.00	NM	4	\$8,800.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/27/14	02/02/14	-1111--		4				\$2,200.00		0.00			
5	WDIV	02/03/14	02/03/14	Inside Edition 430-5P M-EM Inside Edition M-F 430-5p		430p-5p	1-----	:30	1	\$900.00	P-2	0.00	NM	1	\$900.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 02/03/14	02/09/14	1-----		1				\$900.00		0.00			
6	WDIV	02/03/14	02/03/14	6-630pm Local 4 News M-F M-F Local 4 News 6-630pm	M	6P-630P	1-----	:30	1	\$1,500.00	P-2	0.00	NM	1	\$1,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 02/03/14	02/09/14	1-----		1				\$1,500.00		0.00			

Order / Rev: 309809
 Alt Order #: 07028668
 Flight Dates: 01/28/14 - 02/03/14

Advertiser: ISS/Americans for Prosperity
 Product Desc: 756 AM 4 PROSPERITY
 Estimate: 756
WDIV

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
7	WDIV	02/03/14	02/03/14	5-6pm Local 4 News M-FCM M-F Local 4 News 5-6pm		530P-6P (5:30 PM-6:00 PM)	1-----	:30	1	\$1,300.00	P-2	0.00	NM	1	\$1,300.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 02/03/14	02/09/14	1-----		1				\$1,300.00		0.00			
8	WDIV	02/03/14	02/03/14	M-F Local 4 News @11FCM 11-1135P Late News		11P-1135P	1-----	:30	1	\$2,200.00	P-2	0.00	NM	1	\$2,200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 02/03/14	02/09/14	1-----		1				\$2,200.00		0.00			
9	WDIV	01/28/14	01/31/14	1135-1237a Tonight Len@M Tonight Leno		1135P-1237A	-1111--	:30	4	\$650.00	P-2	0.00	NM	4	\$2,600.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 01/27/14	02/02/14	-1111--		4				\$650.00		0.00			
10	WDIV	02/03/14	02/03/14	1135-1237a Tonight Len@M Tonight Leno		1135P-1237A	1-----	:30	1	\$650.00	P-2	0.00	NM	1	\$650.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>				<u>Rate</u>		<u>Rating</u>			
		Week: 02/03/14	02/09/14	1-----		1				\$650.00		0.00			
													Totals	25	\$32,750.00