



GEORGETOWN LAW  
INSTITUTE FOR PUBLIC REPRESENTATION

Directors  
Hope M. Babcock  
Angela J. Campbell  
Michael T. Kirkpatrick  
Benton Senior Counselor  
Andrew Jay Schwartzman  
Staff Attorneys  
Meghan M. Boone  
Justin Gundlach  
Daniel H. Lutz\*  
Aaron Mackey  
Eric Null

600 New Jersey Avenue, NW, Suite 312  
Washington, DC 20001-2075  
Telephone: 202-662-9535  
Fax: 202-662-9634

October 24, 2014

*VIA EMAIL*

John Idler  
General Manager  
WLS-TV  
190 North State Street  
Chicago, Illinois 60601  
John.H.Idler@ABC.com

Re: WLS-TV's obligation under Section 317 of the Communications Act and Section 73.1212(e) of the FCC's regulations to disclose the true identity of sponsored ads.

Dear Mr. Idler:

We are writing on behalf of the Sunlight Foundation, Campaign Legal Center and Common Cause.

Your station has been running broadcast advertisements supporting Robert Dold's congressional campaign identified as having been paid for by Independence USA PAC ("Independence"). Based on the evidence presented below, Michael Bloomberg is the true sponsor of the ads and should be identified on the air as the sponsor. We therefore call upon WLS-TV to identify Michael Bloomberg on all future broadcasts of ads placed by Independence.

\*Admitted to the Washington bar only;  
DC bar membership pending. Practice supervised by members of the DC bar.

The Communications Act and the FCC's regulations require broadcast stations to "fully and fairly disclose the true identity" of the sponsor of a political advertisement at the time the ad is aired.<sup>1</sup>

The true identity of the sponsor of the Independence ads is Michael Bloomberg. According to Federal Election Commission disclosure reports, 100% of Independence's contributions have come from Michael Bloomberg (see Attachment A). Furthermore, the Independence website states that Bloomberg is the group's creator and calls the PAC a "continuation of Mayor Bloomberg's long history of supporting candidates and referenda that reflect his independent and non-partisan approach to government" (see Attachment B). Because Independence owes its entire existence to Bloomberg's donations, he is clearly the person controlling the group and the ads in question.

WLS-TV need go no further than its own reporting to know that Bloomberg is the true sponsor of the Independence advertisements. On February 20, 2013, a WLS-TV article called Independence advertisements "Bloomberg Super-Pac Ads" and stated that the "commercials are financed by New York City Mayor Michael Bloomberg."<sup>2</sup> Numerous other local media outlets have also reported that Bloomberg founded and funds Independence and controls its operations.<sup>3</sup>

Accordingly, your station should identify Michael Bloomberg as the true sponsor of the ads during all future broadcasts. Please inform us that your station intends to meet this disclosure requirement within one week from today, *i.e.*, October 31, 2014.

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<sup>1</sup> 47 USC § 317; 47 CFR §73.1212(e).

<sup>2</sup> Charles Thomas, *Emanuel Denies Involvement in Bloomberg Super-Pac Ads*, ABC 7 Chicago, (Feb. 20, 2013), <http://abc7chicago.com/archive/9000212>.

<sup>3</sup> See *e.g.*, Paul Merrion, *Bloomberg weighs in for Dold*, Chicago Business (Oct. 20, 2014), <http://www.chicagobusiness.com/article/20141020/NEWS02/141029977/bloomberg-weighs-in-for-dold>; Eric Carlson, *Bloomberg Pours \$1.9 Million Into Pro-Dold Ad Buy*, NBC Chicago (Oct. 22, 2014), <http://www.nbcchicago.com/news/local/Bloomberg-pours-nearly-2-million-into-pro-dold-ad-buy-280047732.html>.

John Idler  
October 24, 2014  
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Yours Truly,

/s/

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Eric G. Null  
Andrew Jay Schwartzman  
Angela J. Campbell  
Institute for Public Representation

Keir Lamont  
Georgetown Law Student

cc. John W. Zucker  
Susan Fox

### Attachment A

Contributor Name	Receipt Date	Amount
<a href="#">BLOOMBERG, MICHAEL R.</a>	08/18/2014	\$417,500
<a href="#">BLOOMBERG, MICHAEL R.</a>	08/13/2014	\$75,000
<a href="#">BLOOMBERG, MICHAEL R.</a>	08/06/2014	\$200,000
<a href="#">BLOOMBERG, MICHAEL R.</a>	02/04/2014	\$200,000
<a href="#">BLOOMBERG, MICHAEL R.</a>	01/31/2014	\$3,000
<a href="#">BLOOMBERG, MICHAEL R.</a>	12/20/2013	\$300,000
<a href="#">BLOOMBERG, MICHAEL R.</a>	11/14/2013	\$15,663
<a href="#">BLOOMBERG, MICHAEL R.</a>	11/01/2013	\$13,275
<a href="#">BLOOMBERG, MICHAEL R.</a>	11/01/2013	\$21,000
<a href="#">BLOOMBERG, MICHAEL R.</a>	11/01/2013	\$28,500
<a href="#">BLOOMBERG, MICHAEL R.</a>	10/31/2013	\$41,581
<a href="#">BLOOMBERG, MICHAEL R.</a>	10/30/2013	\$990,000
<a href="#">BLOOMBERG, MICHAEL R.</a>	10/25/2013	\$1,812,582
<a href="#">BLOOMBERG, MICHAEL R.</a>	10/16/2013	\$13,275
<a href="#">BLOOMBERG, MICHAEL R.</a>	10/10/2013	\$732,535
<a href="#">BLOOMBERG, MICHAEL R.</a>	05/14/2013	\$267
<a href="#">BLOOMBERG, MICHAEL R.</a>	02/14/2013	\$700,000
<a href="#">BLOOMBERG, MICHAEL R.</a>	02/08/2013	\$400,000
<a href="#">BLOOMBERG, MICHAEL R.</a>	02/06/2013	\$400,000
<a href="#">BLOOMBERG, MICHAEL R.</a>	02/05/2013	\$400,000
<a href="#">BLOOMBERG, MICHAEL R.</a>	01/29/2013	\$100,000

*Independence USA's FEC Disclosure Filings*

## Attachment B

# Independence USA PAC

Michael R. Bloomberg has created a new major effort to support candidates and referenda in local, state and Federal races across the country, with a focus on issues including gun laws, education policy and marriage equality. The effort will support moderates on both sides of the aisle – as well as independents –who have shown a willingness to work in a bi-partisan fashion. It will also target candidates who support– and oppose– efforts to crack down on illegal guns and reform education policy.

"It's critically important that we have elected officials in Washington, Albany, and around the nation who are willing to work across party lines to achieve real results," Mayor Bloomberg said. "I've always believed in the need for more independent leadership, and this new effort will support candidates and causes that will help protect Americans from the scourge of gun violence, improve our schools, and advance our freedoms."

This effort is a continuation of Mayor Bloomberg's long history of supporting candidates and referenda that reflect his independent and non-partisan approach to government.

Paid for by Independence USA PAC and not authorized by any candidate or candidate's committee.  
[www.IndependenceUSApac.org](http://www.IndependenceUSApac.org)

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*Independence USA's Homepage*