

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

| | |
|--|---|
| Complaint of |) |
| |) |
| Campaign Legal Center and Sunlight |) |
| Foundation |) |
| |) |
| Against |) |
| |) |
| CBS Broadcasting, Inc., licensee of |) |
| WWJ-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 CBS Broadcasting, Inc., licensee of WWJ-TV. In March 2014, WWJ-TV ran a political ad sponsored by the Senate Majority PAC (“SMP”). The station failed to disclose information about SMP and the ad in its online political file 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

WWJ-TV is a CBS-owned and operated broadcast station in Detroit, Michigan. Detroit is the 11th largest Designated Market Area in the country, serving more than 1.8 million households.³ CBS Broadcasting, Inc., licensee of WWJ-TV, is headquartered in New York City and is a mass media creation and distribution company with audiences around the world.⁴

B. The Advertisement

In March 2014, WWJ-TV broadcast a political ad sponsored by SMP. SMP is a Super PAC that works to expand the Democratic majority in the U.S. Senate.⁵ The SMP ad, entitled

¹ See Campaign Legal Center, www.campaignlegalcenter.org (last visited Apr. 3, 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 CBS Corporation, <http://www.cbscorporation.com/ourcompany.php?id=11> (last visited Apr. 3, 2014).

⁵ Senate Majority PAC, Our Mission, <http://www.senatemajority.com/about/> (last visited Apr. 14, 2014).

“Them” and transcribed below, refers to Terri Lynn Land.⁶ Land served two terms as Michigan’s Secretary of State from 2003 to 2010. She is now the Republican candidate for the U.S. Senate seat for Michigan in 2014. Her opponent is U.S. Representative Gary Peters. The SMP ad accuses Land of being influenced by large donors because she takes healthcare policy positions that would hurt average Americans.⁷

[Narrator:] You already know that billionaires are paying for Terri Lynn Land’s Senate race. What they [billionaires] already know is that with Land, insurance companies will be able to deny you coverage when you get sick. Women’s access to preventive healthcare would be cut while their costs would increase.

Now you know what the billionaires know. They know Terri Lynn Land answers to them, and not us.

SMP spent over \$21,000 to air this ad at WWJ-TV for one week, and spent \$500,000 in total running the ad in Michigan. The ad ran for two weeks across multiple broadcast and cable channels.⁸

II. Argument

The SMP ad triggers WWJ-TV’s political file disclosure requirements in the Communications Act and the FCC’s regulations. WWJ-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.

⁶ Exhibit A, attached, is a Detroit News article confirming that SMP aired its ad at multiple stations in Detroit during March 2014. The ad is available on SMP’s YouTube channel, at <https://www.youtube.com/watch?v=BrxbF52mH-Y>.

⁷ See Marisa Schultz, *Democratic PAC to air \$500K in ads against Land in battle for Senate seat*, Detroit News, (Mar. 28, 2014), <http://www.detroitnews.com/article/20140328/POLITICS02/303280095> (attached in Exhibit A).

⁸ *Id.*

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.”⁹

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 which the communication refers, or the issue to which the communication refers (as applicable).”¹⁰ 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.”¹¹

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.”¹² 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.”¹³

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

The SMP 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 refers to Terri Lynn

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

¹⁰ *Id.* § 315(e)(2)(E).

¹¹ *Id.* § 315(e)(2)(G).

¹² 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).

¹³ 47 CFR § 73.1212(e).

Land. Land is a “legally qualified candidate” for the U.S. Senate in Michigan because she frequently updates her campaign website with information about her appearances and speeches, issues press releases, and collects donations.¹⁴ She raised over \$2 million for her campaign in the fourth quarter of 2013 alone.¹⁵

Second, the ad communicates a message relating to both a “political matter of national importance” and a “controversial issue of public importance” for purposes of the Communications Act and the FCC’s regulations.¹⁶ The ad discusses health care reform, including cuts to, and rising costs of, preventive care for women. Health care reform and costs of preventive care for women are national and controversial issues because they are subject to nationwide debate and media coverage, and impact citizens across the entire country.¹⁷ Health care reform is the quintessential controversial issue of public importance: it was President Obama’s key initiative and has been subject to multiple court challenges, including at the Supreme Court.

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

WWJ-TV uploaded the following to its online political file for the sale of airtime for this ad: the contract, which discloses rates, dates, and times the ad ran, in compliance with section 315(e)(2)(A)-(D); and the National Association of Broadcasters (NAB) Form PB-18,

¹⁴ See Terri Lynn Land, The Latest, <http://terrilynnland.com/latest-posts/> (last visited Apr. 15, 2014).

¹⁵ Fritz Klug, *U.S. Senate Update: Terri Lynn Land raises \$2 million in 3 months; new 'Pure Washington' ad attacks Gary Peters*, MLive (Oct. 7, 2013), http://www.mlive.com/news/index.ssf/2013/10/us_senate_update_terri_lynn_la.html.

¹⁶ WWJ-TV’s National Association of Broadcasters form incorrectly identifies the ad as not communicating a national issue. See Exhibit B.

¹⁷ See, e.g., Women’s Preventive Services in the Affordable Care Act: Frequently Asked Questions, <http://www.nwlc.org/resource/women%E2%80%99s-preventive-services-affordable-care-act-frequently-asked-questions> (last visited Apr. 22, 2014).

“Agreement Form for Non-Candidate/Issue Advertisements.” Copies of both are included in Exhibit B.

WWJ-TV has failed to disclose the candidate and issue addressed by the ad. The NAB form provides the space for stations to meet the disclosure requirements of § 315 of the Communications Act. The form asks whether the ad communicates a “message relating to any political matter of national importance.” If yes, then the station must, in the next section, disclose a list of the “candidate(s) the [ad] refers to, the office being sought, and the date(s) of the election.” Stations must also disclose the issue referred to by the ad. WWJ-TV, however, incorrectly checked the box “No,” despite the ad’s explicit references to Land and health care reform. The station thus neglected to fill out the necessary sections requiring disclosure of the candidate and the issue referred to. These omissions amount to a failure to comply with the disclosure laws.

Finally, WWJ-TV fails to disclose a list of SMP’s board of directors or chief executive officers. The NAB form requires this information as well, but the form for the SMP ad lists only one SMP officer, Rebecca Lambe, SMP’s treasurer. Listing merely the treasurer of the organization is insufficient. WWJ-TV’s failure to disclose all of the information described above violates the Communications Act and the FCC’s regulations.

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. WWJ-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 WWJ-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.

Respectfully submitted,

Of counsel:

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Dated: May 1, 2014

*Counsel for Campaign Legal Center
and Sunlight Foundation*

Exhibit A

This ad is available at: <https://www.youtube.com/watch?v=BrxbF52mH-Y>.



The image shows a YouTube video player interface. The video title is "Them". The channel name is "majoritypac" with 84 videos. The video has 5,348 views. The video player shows a woman with blonde hair and glasses, looking slightly to the side. Overlaid text reads: "BILLIONAIRES KNOW TERRI LYNN LAND ANSWERS TO THEM NOT US." Below this, smaller text states: "PAID FOR BY SENATE MAJORITY PAC. WWW.SENATEMAJORITY.COM. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE. SENATE MAJORITY PAC IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING." The video player controls show a progress bar at 0:28 / 0:32. Below the video player, there are buttons for Like, About, Share, Add to, and a flag icon. The video was published on Apr 2, 2014, and no description is available.

Them

majoritypac · 84 videos

5,348

Subscribe 174

Like About Share Add to

Published on Apr 2, 2014
No description available.

Democratic PAC to air \$500K in ads against Land in battle for Senate seat

Marisa Schultz, The Detroit News

March 28, 2014, at 7:33 PM

<http://www.detroitnews.com/article/20140328/POLITICS02/303280095>

A Democratic political action committee is coming to the aid of U.S. Rep. Gary Peters by launching an ad campaign in Michigan.

Senate Majority PAC bought \$500,000 in TV commercials that began airing statewide on broadcast and cable networks and will run for two weeks. The 30-second ad targets Peters' opponent in the U.S. Senate race, Republican Terri Lynn Land, and tries to link her to the billionaire industrialist Koch brothers.

This is the second boost this week for Peters, who launched his first TV ads earlier aimed at introducing the Bloomfield Township Democrat to U.S. Senate voters statewide in a \$1 million buy over seven weeks. The ads feature his wife, Colleen, and family, and emphasizes his middle-class roots, personal story and his efforts to support policies that help the middle class.

The latest push brings TV ad spending on behalf of Peters up to about \$2 million. In turn, conservative groups have spent about \$5 million attacking Peters thus far in the highly competitive race that could determine which party controls the U.S. Senate.

The Senate Majority PAC campaign aims to combat the unequal ad spending by blackballing the financiers of conservative ads. The ad tries to paint Land as being influenced by billionaires by taking healthcare policy positions that would hurt average Michiganians.

"Billionaires are paying for Terri Lynn Land's senate race," the ad says, citing a Feb. 25 Detroit News article that doesn't make that statement at all.

In reality, the Koch brothers have financially backed Americans for Prosperity, a conservative political group that has funneled more than \$5 million in TV advertising in Michigan — largely to attack Peters. By law, Americans for Prosperity is a separate entity from Land's campaign and must make advertising and fundraising decisions independent of candidates.

There's no doubt, however, AFP's emotional anti-Obamacare attack ads on Peters are a factor in the Senate race. While an earlier ad featuring cancer patient Julie Boonstra came under fire for the accuracy of its claims, AFP doubled down recently with another \$1.5 million ad buy featuring Grand Rapids mother of five Shannon Wendt, saying she lost insurance under Obamacare and the new plan is "unaffordable."

The Washington Post's fact checker Glenn Kessler rated that ad with two Pinocchios Thursday because the Wendts turned down government-funded Medicaid, which would have made their health care less expensive.

Senate Majority PAC stands by its ad claims that Land is being funded by billionaires: “Americans for Prosperity, funded by the billionaire Koch brothers, are spending millions to ensure a Land victory,” spokesman Ty Matsdorf said in an email. “They are doing this because Land has already publicly stated that she will adhere to their reckless and irresponsible agenda of repealing health care reform which would go back to the days where insurance companies wrote the rules at the expense of families and seniors.”

Land’s campaign spokeswoman, Heather Swift, called the ad campaign hypocritical. She pointed to financial reports showing the largest donor to Senate Majority PAC is billionaire former New York Mayor Michael Bloomberg. (He donated \$2.5 million to the Democratic group last year, records show.)

“It’s no surprise that Harry Reid’s super PAC, which is funded by billionaires from California and New York, are sinking to hypocrisy and lies,” Swift said in a statement. “... If Gary and Harry want to silence the ‘out of state billionaires,’ they should start with their own allies.”

Exhibit B

NAB Form PB-17 Issues

AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

| | |
|------------------------------|--------------|
| Station and Location: | Date: |
|------------------------------|--------------|


I, DAN NAGELBERG
do hereby request station time concerning the following issue:

| |
|---------------------|
| SENATE MAJORITY PAC |
|---------------------|

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

| |
|-----------------------|
| Total Charges: |
|-----------------------|

This broadcast time will be used by: SENATE MAJORITY PAC



| |
|--|
| Does the programming (in whole or in part) communicate "a message relating to any political matter of national importance?" |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

Copyright © 2011 by the National Association of Broadcasters. May Not Be Copied, Reproduced, or Further Distributed.

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 office(s) being sought and the date(s) of the election(s) (if applicable):



For programming that "communicates a message relating to any political matter of national importance," attach Agreed Upon Schedule (Page 3)

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

SENATE MAJORITY PAC 700 15th ST NW STE 600
 WASHINGTON DC 20005
 202-450-3486

and you are authorized to announce the time as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is:

☐ a corporation;
 ☐ a committee;
 ☐ an association;
 ☒ or other unincorporated group.

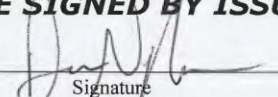


The names, offices, and addresses of the chief executive officers, directors, and/or authorized agents of the entity are named below (may be attached separately): REBECCA LAMB, TREASURER

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

I agree 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), I also agree to prepare a script, transcript, or tape, which will be delivered to the station at least _____ before the time of the scheduled broadcasts.

TO BE SIGNED BY ISSUE ADVERTISER

7/23/13  202-338-8700
 Date Signature Contact Phone Number

TO BE SIGNED BY STATION REPRESENTATIVE

☐ Accepted ☐ Accepted in Part ☐ Rejected

 Signature Printed Name Title

AGREED UPON SCHEDULE

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

| Broadcast Length | Time of Day, Rotation or Package | Days | Class | Times per Week | Number of Weeks |
|--|----------------------------------|------|-------|----------------|-----------------|
| <div style="font-size: 48px; font-family: cursive;">AS ORDERED</div> | | | | | |

Total Charges:

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, 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.



AGREEMENT MADE BETWEEN

WWJ-TV

26905 WEST ELEVEN MILE RD., . SOUTHFIELD MI 48034

WWJ-TV

CONTRACT NO. REV.

1091-60902-1

DATE PRINTED

03/21/14

AND

PAGE 1

| 179297 | AGENCY (OR SERVICE) ACTING AS AGENT FOR 339947 | | ADVERTISER (OR AGENCY AND ADVERTISER) | | Cancellation Notice Required Announcement 28 days prior notice | | | | | |
|--|---|---------------|--|---------------|--|-------------------|-----------------------------|--------------|-----------|----------------|
| NAME | WATERFRONT STRATEGIES | | SENATE MAJORITY PAC | | | | | | | |
| AND | 3050 K St NW Ste 100 | | 700 13th St NW | | | | | | | |
| ADDRESS | Washington | DC 20007-5108 | Washington | DC 20005-3960 | | | | | | |
| CONTACT | USA | | USA | | | | | | | |
| LOCAL SALESPERSON | Maggie McWilliams - CTS-PH | | PRODUCT | EST 2620 | | | | | | |
| AGENCY EST. NO. | 2620 | | CODE | 1300 | | | | | | |
| NATIONAL SALESPERSON | | | | | | | | | | |
| BROADCAST SCHEDULE STARTING 03/24/14 AND ENDING 03/30/14 NO. WEEKS: 1 | | | | | | | | | | |
| CBS Television Stations Standard Terms and Conditions for advertising shall apply. NONDISCRIMINATION POLICY: CBS Television Stations and its Stations do not discriminate in advertising contracts on the basis of race or ethnicity, and will not accept any advertising which is intended to discriminate on the basis of race or ethnicity. Advertiser represents and warrants that it is not purchasing time from CBS Television Stations or its Stations that is intended to discriminate on the basis of race or ethnicity. | | | | | | | | | | |
| ITEM | DAYS | SPOTS PWK. | TIME | | LENGTH | EFFECTIVE DATES | PROGRAMS | TOTAL BDCST. | UNIT RATE | TOTAL VALUE(1) |
| | | | FROM | TO | | | | | | |
| 1 | M-F | 2 | 06:00P | 06:28P | 30S | 03/24/14-03/28/14 | THE INSIDER | 2 | 300.00 | 600.00 |
| 2 | M-F | 2 | 07:27P | 07:57P | 30S | 03/24/14-03/28/14 | FAMILY FEUD | 2 | 1000.00 | 2000.00 |
| 3 | T | 1 | 10:00P | 11:00P | 30S | 03/25/14-03/25/14 | PERSON OF INTEREST | 1 | 3500.00 | 3500.00 |
| 4 | M-F | 1 | 11:35P | 12:37A | 30S | 03/24/14-03/28/14 | DAVID LETTERMAN | 1 | 350.00 | 350.00 |
| 5 | Sa | 1 | 11:00P | 11:03P | 30S | 03/29/14-03/29/14 | LATE FIRST FORECAST SPONSOR | 1 | 1500.00 | 1500.00 |
| 6 | M-F | 2 | 06:00A | 06:58A | 30S | 03/24/14-03/28/14 | CBS MORNING NEWS | 2 | 60.00 | 120.00 |
| 7 | M-F | 2 | 06:57A | 09:00A | 30S | 03/24/14-03/28/14 | CBS THIS MORNING | 2 | 75.00 | 150.00 |
| 8 | Su | 1 | 08:58A | 10:30A | 30S | 03/30/14-03/30/14 | CBS SUNDAY MORNING | 1 | 500.00 | 500.00 |
| 9 | M-F | 3 | 10:57A | 12:00N | 30S | 03/24/14-03/28/14 | THE PRICE IS RIGHT | 3 | 400.00 | 1200.00 |
| 10 | M-F | 3 | 04:58P | 06:00P | 30S | 03/24/14-03/28/14 | DR. PHIL | 3 | 450.00 | 1350.00 |
| 11 | Su | 1 | 09:00P | 10:00P | 30S | 03/30/14-03/30/14 | THE GOOD WIFE | 1 | 3500.00 | 3500.00 |
| 12 | W | 1 | 10:00P | 11:00P | 30S | 03/26/14-03/26/14 | CSI:CRIME SCENE | 1 | 3000.00 | 3000.00 |
| 13 | M-F | 2 | 11:00P | 11:03P | 30S | 03/24/14-03/28/14 | LATE FIRST FORECAST SPONSOR | 2 | 1500.00 | 3000.00 |
| 14 | M-F | 1 | 11:02P | 11:35P | 30S | 03/24/14-03/28/14 | TWO AND A HALF MEN | 1 | 500.00 | 500.00 |
| (1) Less Agency commission of 15% Except on Non-Commissionable Amounts. Conditions on the reverse of this page and any attachments hereto are an integral part of this Agreement. If this contract is with an Advertiser, references to Agency apply to Advertiser, except no commission will be allowed an Advertiser. | | | | | | | | | | |
| ACCEPTED BY AGENCY | | | AS AGENT FOR (ADVERTISER) | | | | ACCEPTED BY STATION | | | |



AGREEMENT MADE BETWEEN

WWJ-TV

26905 WEST ELEVEN MILE RD., . SOUTHFIELD MI 48034

WWJ-TV

CONTRACT NO. REV.

1091-60902-1

DATE PRINTED

03/21/14

AND

PAGE 2

| | | | | |
|--|--|---------------|--|---|
| 179297 | AGENCY (OR SERVICE) ACTING AS AGENT FOR | 339947 | ADVERTISER (OR AGENCY AND ADVERTISER) | Cancellation Notice Required Announcement 28 days prior notice |
| NAME | WATERFRONT STRATEGIES | | SENATE MAJORITY PAC | |
| AND | 3050 K St NW Ste 100 | | 700 13th St NW | |
| ADDRESS | Washington | DC 20007-5108 | Washington DC 20005-3960 | |
| | USA | | USA | |
| CONTACT | Mike FURMAN | | PRODUCT EST 2620 | |
| LOCAL SALESPERSON | AGENCY EST. NO. 2620 | | PRODUCT CODE 1300 | |
| NATIONAL SALESPERSON | Maggie McWilliams - CTS-PH | | | |
| BROADCAST SCHEDULE STARTING 03/24/14 AND ENDING 03/30/14 NO. WEEKS: 1 | | | | |

CBS Television Stations Standard Terms and Conditions for advertising shall apply.
NONDISCRIMINATION POLICY: CBS Television Stations and its Stations do not discriminate in advertising contracts on the basis of race or ethnicity, and will not accept any advertising which is intended to discriminate on the basis of race or ethnicity. Advertiser represents and warrants that it is not purchasing time from CBS Television Stations or its Stations that is intended to discriminate on the basis of race or ethnicity.

| ITEM | DAYS | SPOTS PWK | TIME | | LENGTH | EFFECTIVE DATES | PROGRAMS | TOTAL BDCST. | UNIT RATE | TOTAL VALUE(1) |
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(1) Less Agency commission of 15% Except on Non-Commissionable Amounts. Conditions on the reverse of this page and any attachments hereto are an integral part of this Agreement. If this contract is with an Advertiser, references to Agency apply to Advertiser, except no commission will be allowed an Advertiser.

ACCEPTED BY AGENCY

AS AGENT FOR (ADVERTISER)

ACCEPTED BY STATION

Order Item Summary

CBS TELEVISION STATIONS



WWJ-TV

Order#: 60902 CF NTL-Cash-Political
Advertiser: SENATE MAJORITY PAC (339947)
700 13th St NW
Washington, DC 20005-3960

Start - End: 3/24/2014 - 3/30/2014
Alt Ord Id:

HL#:

Created: 03/20/2014 05:41 P

Agency: WATERFRONT STRATEGIES (179297)
3050 K St NW Ste 100
Washington, DC 20007-5108

CPE: 163/173/2620
Product: EST 2620
Demo: HHOLDS DMARTG

Print Invoice Locally: N
Co-op Invoice: N
Do Not Mail Invoice: N
Apply Taxes: N
Notarize Invoice: N
Print Affidavit: N
Print Sub Invoice: N
Notarize Sub Invoice: N
Updated: 03/21/2014 09:22 A
Contract: 03/21/2014 09:23 A
Billing Int: Normal
Billing Mth: Item Rate
Comm Cat: Political
Supress Rates: N
Schedule Code: Z

AE: Maggie McWilliams (CTS-PH)
Buyer: Mike FURMAN

Agency Commission: 15%
Self Protection Intr: :30.00

Share: 15% WDIV: 39% WXYZ: 25% WJBK: 17% WKBD: 4%

Internal: NEW ORDER; ZRP/CTS-PH 3/20/14
ok sr 3.21.14
ok sr 3.21.14

| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
|------|------------|---------------|-----------|--------------------------------------|-----|----|---------|--------|------|-------|-------|-----------|----|
|------|------------|---------------|-----------|--------------------------------------|-----|----|---------|--------|------|-------|-------|-----------|----|

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|-----|-------------|---------------------------------------|------|----------------------------------|----|---|--------|------|----------|---|----------|----------|--|
| 001 | CF EINSIDER | MTWTF** | EFG1 | Airtime (Broadcast) Political | 30 | Z | :30.00 | 0.00 | \$300.00 | 2 | \$600.00 | \$300.00 | |
| | | <u>Start</u> <u>End</u> <u>Mar 24</u> | | | | | | | | | | | |
| | | 03/24/14 03/28/14 2 | | | | | | | | | | | |

| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
|------|------------|---------------|-----------|--------------------------------------|-----|----|---------|--------|------|-------|-------|-----------|----|
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|-----|--------------|---------------------------------------|-----|----------------------------------|----|---|--------|------|------------|---|------------|------------|--|
| 002 | CF AFEUD730P | MTWTF** | ACC | Airtime (Broadcast) Political | 30 | Z | :30.00 | 0.00 | \$1,000.00 | 2 | \$2,000.00 | \$1,000.00 | |
| | | <u>Start</u> <u>End</u> <u>Mar 24</u> | | | | | | | | | | | |
| | | 03/24/14 03/28/14 2 | | | | | | | | | | | |

| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
|------|------------|---------------|-----------|--------------------------------------|-----|----|---------|--------|------|-------|-------|-----------|----|
|------|------------|---------------|-----------|--------------------------------------|-----|----|---------|--------|------|-------|-------|-----------|----|

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|-----|----------------|---------------------------------------|------|----------------------------------|----|---|--------|------|------------|---|------------|------------|--|
| 003 | CF PPERSONTUE3 | *T***** | REGP | Airtime (Broadcast) Political | 30 | Z | :30.00 | 0.00 | \$3,500.00 | 1 | \$3,500.00 | \$3,500.00 | |
| | | <u>Start</u> <u>End</u> <u>Mar 24</u> | | | | | | | | | | | |
| | | 03/25/14 03/25/14 1 | | | | | | | | | | | |

| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
|------|------------|---------------|-----------|--------------------------------------|-----|----|---------|--------|------|-------|-------|-----------|----|
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|-----|--------------|---------------------------------------|------|----------------------------------|----|---|--------|------|----------|---|----------|----------|--|
| 004 | CF LLETTER02 | MTWTF** | LETT | Airtime (Broadcast) Political | 30 | Z | :30.00 | 0.00 | \$350.00 | 1 | \$350.00 | \$350.00 | |
| | | <u>Start</u> <u>End</u> <u>Mar 24</u> | | | | | | | | | | | |
| | | 03/24/14 03/28/14 1 | | | | | | | | | | | |

| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
|------|------------|---------------|-----------|--------------------------------------|-----|----|---------|--------|------|-------|-------|-----------|----|
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|-----|--------------|---------------------------------------|-----|----------------------------------|----|---|--------|------|------------|---|------------|------------|--|
| 005 | CF LFORECAST | *****S* | WEA | Airtime (Broadcast) Political | 30 | Z | :30.00 | 0.00 | \$1,500.00 | 1 | \$1,500.00 | \$1,500.00 | |
| | | <u>Start</u> <u>End</u> <u>Mar 24</u> | | | | | | | | | | | |
| | | 03/29/14 03/29/14 1 | | | | | | | | | | | |

| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
|------|------------|---------------|-----------|--------------------------------------|-----|----|---------|--------|------|-------|-------|-----------|----|
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|-----|------------|---------------------------------------|------|----------------------------------|----|---|--------|------|---------|---|----------|---------|--|
| 006 | CF MNEWS6A | MTWTF** | NEWS | Airtime (Broadcast) Political | 30 | Z | :30.00 | 0.00 | \$60.00 | 2 | \$120.00 | \$60.00 | |
| | | <u>Start</u> <u>End</u> <u>Mar 24</u> | | | | | | | | | | | |
| | | 03/24/14 03/28/14 2 | | | | | | | | | | | |

| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
|------|------------|---------------|-----------|--------------------------------------|-----|----|---------|--------|------|-------|-------|-----------|----|
|------|------------|---------------|-----------|--------------------------------------|-----|----|---------|--------|------|-------|-------|-----------|----|

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|-----|-----------|---------------------------------------|------|----------------------------------|----|---|--------|------|---------|---|----------|---------|--|
| 007 | CF MEARLY | MTWTF** | MORN | Airtime (Broadcast) Political | 30 | Z | :30.00 | 0.00 | \$75.00 | 2 | \$150.00 | \$75.00 | |
| | | <u>Start</u> <u>End</u> <u>Mar 24</u> | | | | | | | | | | | |
| | | 03/24/14 03/28/14 2 | | | | | | | | | | | |

Order Item Summary

WWJ-TV

| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
|------|--------------|---------------|---------------|--------------------------------------|-----|----|---------|--------|------------|-------|------------|------------|----|
| 008 | CF WCBSSUN01 | *****S | MORN | Airtime (Broadcast) Political | 30 | Z | :30:00 | 0.00 | \$500.00 | 1 | \$500.00 | \$500.00 | |
| | <u>Start</u> | <u>End</u> | <u>Mar 24</u> | | | | | | | | | | |
| | 03/30/14 | 03/30/14 | 1 | | | | | | | | | | |
| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
| 009 | CF DPRICE | MTWTF** | DAY | Airtime (Broadcast) Political | 30 | Z | :30:00 | 0.00 | \$400.00 | 3 | \$1,200.00 | \$400.00 | |
| | <u>Start</u> | <u>End</u> | <u>Mar 24</u> | | | | | | | | | | |
| | 03/24/14 | 03/28/14 | 3 | | | | | | | | | | |
| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
| 010 | CF EPHIL5P | MTWTF** | EFG1 | Airtime (Broadcast) Political | 30 | Z | :30:00 | 0.00 | \$450.00 | 3 | \$1,350.00 | \$450.00 | |
| | <u>Start</u> | <u>End</u> | <u>Mar 24</u> | | | | | | | | | | |
| | 03/24/14 | 03/28/14 | 3 | | | | | | | | | | |
| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
| 011 | CF PWIFESUN2 | *****S | REGP | Airtime (Broadcast) Political | 30 | Z | :30:00 | 0.00 | \$3,500.00 | 1 | \$3,500.00 | \$3,500.00 | |
| | <u>Start</u> | <u>End</u> | <u>Mar 24</u> | | | | | | | | | | |
| | 03/30/14 | 03/30/14 | 1 | | | | | | | | | | |
| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
| 012 | CF PCSIWE3 | **W**** | REGP | Airtime (Broadcast) Political | 30 | Z | :30:00 | 0.00 | \$3,000.00 | 1 | \$3,000.00 | \$3,000.00 | |
| | <u>Start</u> | <u>End</u> | <u>Mar 24</u> | | | | | | | | | | |
| | 03/26/14 | 03/26/14 | 1 | | | | | | | | | | |
| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
| 013 | CF LFORECAST | MTWTF** | WEA | Airtime (Broadcast) Political | 30 | Z | :30:00 | 0.00 | \$1,500.00 | 2 | \$3,000.00 | \$1,500.00 | |
| | <u>Start</u> | <u>End</u> | <u>Mar 24</u> | | | | | | | | | | |
| | 03/24/14 | 03/28/14 | 2 | | | | | | | | | | |
| Item | Time Class | Eligible Days | BreakType | Product Category Commission Catg. | Dur | SC | Self Pr | HHOLDS | Rate | Spots | Total | NRate A/G | LC |
| 014 | CF L2.5MEN | MTWTF** | LFG | Airtime (Broadcast) Political | 30 | Z | :30:00 | 0.00 | \$500.00 | 1 | \$500.00 | \$500.00 | |
| | <u>Start</u> | <u>End</u> | <u>Mar 24</u> | | | | | | | | | | |
| | 03/24/14 | 03/28/14 | 1 | | | | | | | | | | |

Confirmed Broadcast Buyline Summary

| Q1 2014 | Mar | |
|-----------------|-------|-------------|
| | Spots | Revenue |
| Total | 23 | \$21,270.00 |
| Credited | 0 | \$0.00 |

Order Item Summary

CBS TELEVISION
STATIONS



WWJ-TV

Order Summary

| | Confirmed | | |
|----------------------|-----------|--------------|-------------|
| | Quantity | Gross Amount | Net Amount |
| Broadcast Buy Lines | 23 | \$21,270.00 | \$18,079.50 |
| Ancillary Buy Lines | 0 | \$0.00 | \$0.00 |
| Installment Schedule | 0 | \$0.00 | \$0.00 |
| Total | 23 | \$21,270.00 | \$18,079.50 |