

**FEDERAL COMMUNICATIONS COMMISSION
ENFORCEMENT BUREAU****INVESTIGATIONS AND HEARINGS DIVISION**

445 12th STREET, S.W. ■ WASHINGTON, D.C. 20554

TEL: (202) 418-1420 ■ FAX: (202) 418-2080

FACSIMILE TRANSMISSION**DATE:**7/25/2016**TO:**Mr. Mike Stutz, General Manager
Gulf California Broadcast Co.

Fax number:

(760) 343-3512

Telephone number:

(760) 773-0342**FROM:**Melanie Godschall, Esquire

Telephone number:

(202) 418-9259

IMPORTANT: This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is confidential, privileged, and/or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE:

TOTAL NUMBER OF PAGES IN THIS FAX: 151 (including this cover page)

IF THERE IS A PROBLEM WITH THIS TRANSMISSION, PLEASE CALL (202) 418-1420.

**FEDERAL COMMUNICATIONS COMMISSION**

Enforcement Bureau
Investigations and Hearings Division
445 12th Street, SW
Washington, DC 20554

July 25, 2016

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED
AND FACSIMILE AT 816-271-8695

Mr. J. Timothy Hannan
Executive Vice President
News-Press & Gazette Company, Parent of Gulf-California Broadcast Company
825 Edmond Street
Saint Joseph, Missouri 64501

Re: File No. EB-IHD-16-00021742

Dear Mr. Hannan:

The Enforcement Bureau is investigating potential violations of Sections 317 and 507 of the Communications Act of 1934, as amended (Act), and Section 73.1212 of the Commission's rules (Rules) related to required sponsorship identification announcements and disclosure of certain payments.¹ Accordingly, we direct Gulf-California Broadcast Company (Gulf-California), pursuant to Sections 4(i), 4(j), 308(b), and 403 of the Act,² to provide the information and documents requested herein within **thirty (30) calendar days** after the date of this letter of inquiry (LOI).

We are investigating whether Gulf-California violated the sponsorship identification requirements of the Act and the Rules by failing to provide sponsorship announcements for program material promoting individuals and businesses that provided payments or other valuable consideration, as defined herein, to station employees in exchange for such on-air promotion. Specifically, we have received complaints alleging that Bianca Rae, a morning news anchor at Station KESQ-TV, and Alexandra Pierce, a news reporter at Station KESQ-TV, accepted or agreed to accept consideration including, but not limited to, clothing, shoes, spa and aesthetic services, and stylist services from individuals and businesses in exchange for promoting those individuals and businesses during programming aired on the station, but that no required sponsorship announcements were aired even though station managers were aware of these on-air employees' promotional agreements.³

Section 317(a)(1) of the Act and Section 73.1212(a) of the Rules require a television station to broadcast an announcement whenever money or other valuable consideration is directly or indirectly paid or promised to, or charged or accepted by, the station for the broadcast of program material.⁴ The

¹ 47 U.S.C. §§ 317, 508; 47 C.F.R. § 73.1212.

² 47 U.S.C. §§ 154(i), 154(j), 308(b), 403.

³ All of the complainants have requested confidential treatment of their complaints. A redacted copy of one of the complaints is attached. See Complaint, File No. EB-IHD-16-00021509 (Feb. 7, 2016) (on file in EB-IHD-16-00021742).

⁴ 47 U.S.C. § 317(a)(1); 47 C.F.R. § 73.1212(a).

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 2 of 14

disclosure must be aired at the time that the material is broadcast, inform the viewer that the program is sponsored, paid for, or furnished, either in whole or in part, and identify by whom or on whose behalf the consideration was paid to the station in exchange for airing such material.⁵

Section 507 of the Act (codified at 47 U.S.C. § 508) mandates that when an entity or individual pays to have program material broadcast, both the person making the payment and the person receiving it make a disclosure to the licensee in advance of the broadcast. This disclosure permits the licensee to air a sponsorship-identification announcement at the time of the broadcast to inform viewers or listeners that a third party paid for the broadcast.⁶ The duty to disclose rests with any person involved in the production or preparation of broadcast matter who receives or agrees to receive, or provides or promises to provide, money or other consideration in exchange for the inclusion of program material in a broadcast.⁷

In addition, Section 317(c) of the Act and Section 73.1212(b) of the Rules require each licensee to "exercise reasonable diligence" to obtain information from its employees and other individuals concerning whether particular program material is sponsored in order to enable the licensee to make the required announcement.⁸

This LOI constitutes an order of the Commission to produce the documents and information requested herein.⁹ To knowingly and willfully make any false statement or conceal any material fact in reply to this inquiry is punishable by fine or imprisonment.¹⁰ **Failure to respond appropriately to this LOI constitutes a violation of the Act and our Rules.**¹¹

Attachment A to this letter includes filing requirements and instructions for your response and definitions for certain terms in this LOI. Requests for confidential treatment or claims of attorney-client privilege or attorney work product must strictly meet the requirements stated in the attached instructions.

If the Enforcement Bureau determines that Gulf-California has acted in violation of the Act and/or Rules, the continued violation of the disclosure requirements of Section 317 of the Act and Section 73.1212 of the Rules after the receipt of this LOI may subject Gulf-California to additional penalties.

⁵ See 47 C.F.R. § 73.1212(a).

⁶ See 47 U.S.C. § 317(b).

⁷ See 47 U.S.C. § 508(b).

⁸ 47 U.S.C. § 317(c); 47 C.F.R. § 73.1212(b).

⁹ See 47 U.S.C. § 155(c)(3).

¹⁰ See 18 U.S.C. § 1001; see also 47 C.F.R. § 1.17.

¹¹ See 47 U.S.C. 503(b)(1)(B); see also *Net One Int'l, Net One, LLC, Farrahtel Int'l, LLC*, Forfeiture Order, 29 FCC Red 264, 267, para. 9 (Enf. Bur. 2014) (imposing a \$25,000 penalty for failure to respond to LOI); *Conexions, LLC d/b/a Conexion Wireless*, Notice of Apparent Liability for Forfeiture and Order, 28 FCC Red 15318, 15325, para. 22 (2013) (proposing a \$300,000 forfeiture for failure to provide timely and complete responses to an LOI); *Technical Comm'n Network, LLC*, Notice of Apparent Liability for Forfeiture and Order, 28 FCC Red 1018, 1020, para. 8 (Enf. Bur. 2013) (proposing a \$25,000 forfeiture for failure to provide a complete response to an LOI); *SBC Comme'ns, Inc.*, Forfeiture Order, 17 FCC Red 7589, 7600, para. 28 (2002) (imposing \$100,000 penalty for failing to submit a sworn written response).

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 3 of 14

If you have any questions about this matter, please contact Melanie Godschall at 202-418-7259 or
Melanie.Godschall@fcc.gov.

Sincerely,



Matthew L. Conaty
Deputy Chief
Investigations and Hearings Division
Enforcement Bureau

Attachments

cc, via Certified Mail Return Receipt Requested and Facsimile at 760-773-5128:

Mr. Mike Stutz
General Manager
Gulf-California Broadcast Company
31276 Dunham Way
Thousand Palms, California 92276

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 4 of 14

ATTACHMENT A

Inquiries: Information and Documents to be Provided

You must provide the following information and documents as requested below, and in accordance with the Instructions and Definitions below.

Unless otherwise indicated, the time covered by these inquiries is January 5, 2015, to the present.

Requests for Information

1. Describe the business structure of Gulf-California (e.g., corporation, sole proprietorship, partnership, limited liability company, etc.). If it is a corporation, give the date and location of its incorporation and describe what type of corporation it is (e.g., public or privately held).¹² If it is a sole proprietorship, partnership, or limited liability company, identify each owner, partner or member, as applicable.¹³ In addition, identify all parent and affiliate companies of Gulf-California and explain their relationship with Gulf-California.
2. Identify the Licensee's officers and directors and the positions that they held, respectively, for each year from 2015 to the present. If it is a sole proprietorship, partnership, or limited liability company, identify each owner, partner, or member, as applicable.¹⁴
3. Identify the corporate headquarters address of the Licensee and the States in which the Licensee is authorized to do business; indicate whether it is in good standing in each such State. Identify the Tax Identification Number of the Licensee.
4. Identify the registered agent of the Licensee within the United States.
5. Identify the FCC Registration Number (FRN) or FRNs of Gulf-California and any parent and affiliate companies of Gulf-California.
6. Identify any licenses, permits, certificates, or other authorization, including any Section 214 authorization for the resale of international long distance service, issued by the Commission held by Gulf-California and/or held by any parent or affiliate companies of Gulf-California.
7. State whether Gulf-California has received any complaints or reports related to compliance with the sponsorship identification requirements of the Act and the Rules. If so, provide full details of such complaints, including the dates the complaints or reports were received, a description of the complaint or report, and the contact information of the complainant or reporter. In addition, if Gulf-California has received any such complaints or reports, state what actions, if any, Gulf-California has taken in response.
8. Identify Bianca Rae, the dates of her employment by Licensee, and, chronologically, the title and nature of each position she has held with Licensee.
9. Identify Alexandra Pierce, the dates of her employment by Licensee, and, chronologically, the title and nature of each position she has held with Licensee.
10. State whether Bianca Rae received or was promised Consideration from any source including, but not limited to, the Persons listed in Attachment B, in exchange for the Broadcast of Programming

¹² In responding to this inquiry, note the definition below of the term "Identify" when used in reference to a Person in the Instructions to this letter.

¹³ *Id.*

¹⁴ *Id.*

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 5 of 14

on any Station. If so:

- (a) Identify the Persons from whom such consideration was received or promised;
- (b) State the nature and value of the Consideration involved;
- (c) State the dates on which the Consideration was promised or received;
- (d) Provide a description of the agreement, including whether the agreement was oral or written, by which Bianca Rae received or was promised Consideration in exchange for the Broadcast of Programming;
- (e) Identify the Persons who negotiated, approved, or executed the agreement;
- (f) State the dates, times, and Station(s) on which the Programming was Broadcast pursuant to the agreement;
- (g) Provide a full description of the Broadcast during which the Programming aired, including the content of the Broadcast and whether each such Broadcast of the Programming was live or recorded;
- (h) State whether each Broadcast of the Programming followed a script and if so, Identify all of the Persons responsible for drafting, editing, and approving each script;
- (i) Identify all Programming Personnel involved in each Broadcast of the Programming and fully describe each Person's respective role in the Broadcast process; and
- (j) State whether the Licensee announced that such Programming was aired in exchange for Consideration and if so, specify the manner in which that sponsorship identification occurred.

11. State whether Alexandra Pierce received or was promised Consideration from any source including, but not limited to, the Persons listed in Attachment B, in exchange for the Broadcast of Programming on any Station. If so:

- (a) Identify the Persons from whom such consideration was received or promised;
- (b) State the nature and value of the Consideration involved;
- (c) State the dates on which the Consideration was promised or received;
- (d) Provide a description of the agreement, including whether the agreement was oral or written, by which Alexandra Pierce received or was promised Consideration for the Broadcast of Programming;
- (e) Identify the Persons who negotiated, approved, or executed the agreement;
- (f) State the dates, times, and Station(s) on which Programming was Broadcast pursuant to the agreement;
- (g) Provide a full description of the Broadcast during which the Programming aired, including the content of the Broadcast and whether each such Broadcast of the Programming was live or recorded;
- (h) State whether each Broadcast of the Programming followed a script and if so, Identify all of the Persons responsible for drafting, editing, and approving each script;
- (i) Identify all Programming Personnel involved in each Broadcast of the Programming and fully describe each Person's respective role in the Broadcast process; and

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 6 of 14

- (j) State whether the Licensee announced that such Programming was aired in exchange for Consideration and if so, specify the manner in which that sponsorship identification occurred.
12. For each instance of Programming depicted or referenced in Attachment C,¹⁵ provide the following information or, if such information has been previously provided in response to Inquiries 10 and 11 above, provide a reference to such information contained within those responses:
- (a) State whether the Licensee or any Licensee employees, representatives, or agents received or were promised Consideration from any source including, but not limited to, the Persons listed in Attachment B, in exchange for the Broadcast of Programming on any Station. If so:-
- i. Identify the Persons from whom such consideration was received or promised;
 - ii. State the nature and value of the Consideration involved;
 - iii. State the dates on which the Consideration was promised or received;
 - iv. Provide a description of the agreement, including whether the agreement was oral or written, by which the Licensee and/or its employees, representatives, or agents received or were promised Consideration in exchange for the Broadcast of Programming;
 - v. Identify the Persons who negotiated, approved, or executed the agreement;
 - vi. State the dates, times, and Station(s) on which the Programming was Broadcast pursuant to the agreement;
 - vii. Provide a full description of the Broadcast during which the Programming aired, including the content of the Broadcast and whether each such Broadcast of the Programming was live or recorded;
 - viii. State whether each Broadcast of the Programming followed a script and if so, Identify all Persons responsible for drafting, editing, and approving each script;
 - ix. Identify all Programming Personnel involved in each Broadcast of the Programming and fully describe each Person's respective role in the Broadcast process; and
 - x. State whether the Licensee announced that such Programming was aired in exchange for Consideration and if so, specify the manner in which that sponsorship identification occurred.
13. For each Broadcast listed in response to Inquiries 10, 11, and 12 above, state whether any Person provided any oral or written communications and/or materials to the Licensee indicating that any Person had provided Consideration relating to the Programming. If so, provide the following information:
- (a) the dates on which the Licensee received such communications and/or materials; and
 - (b) a written account of any such oral communications.
14. For each Broadcast listed in response to Inquiries 10, 11, and 12 above, provide the following

¹⁵ The source of material in Attachment C is Bianca Rae's and Alexandra Pierce's Station Social Media Accounts (Twitter, Instagram and/or Facebook).

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 7 of 14

information:

- (a) a full description of the actions and/or procedures, if any, the Licensee took to determine whether the Programming required sponsorship identification;
 - (b) the dates on which such actions and/or procedures began and ended;
 - (c) the Persons who authorized or performed such actions and/or procedures; and
 - (d) a full description of the information obtained by means of such actions and/or procedures.
15. If the Licensee asserts that sponsorship identifications were not required in connection for a Broadcast of Programming identified in response to Inquiries 10, 11, and 12 above, fully explain the basis for this assertion.
16. State whether the Licensee has policies, directives, and/or guidelines concerning Station Social Media Accounts and/or postings of its employees, representatives or agents thereto. If so:
- (a) Provide a description of such policies, directives, and/or guidelines;
 - (b) Provide a description of the Licensee's oversight of Station Social Media Account postings;
 - (c) Identify Licensee employees, representatives, or agents responsible for the oversight described in Inquiry 16(b) above;
 - (d) For each social media posting referenced in Attachment C that depicts Programming for which the Licensee or any Licensee employee, agent or representative received or was promised Consideration in exchange for the Broadcast of such Programming, provide a full description of the actions and/or procedures, if any, that the Licensee took to determine if the social media posting related to Programming for which the Licensee or any Licensee employee, agent or representative received or was promised Consideration in exchange for the Broadcast of such Programming;
 - (e) Fully describe the results of the actions and/or procedures listed in response to Inquiry 16(d) above.
17. If the Licensee has no policies, directives, and/or guidelines concerning Station Social Media Accounts and/or postings of its employees, representatives or agents thereto, then provide the following information:
- (a) an explanation as to why the Licensee has no such policies, directives, and/or guidelines; and
 - (b) the nature of any such policies, directives, and/or guidelines discontinued by the Licensee in the past; the date of their discontinuance; and the reason for their discontinuance.
18. State the nature and dates of the training and/or refresher training, if any, concerning the sponsorship identification requirements of Sections 317 and 507 of the Act and Section 73.1212 of the Rules administered to or undertaken by the following Persons:
- (a) Bianca Rae;
 - (b) Alexandra Pierce; and
 - (c) Licensee employees, representatives, and agents Identified in response to Inquiry 16(c) above.
19. For the period January 1, 2006, to the present, Identify any other instance when the Licensee received or was issued a Letter of Inquiry, Citation, Warning Letter, Notice of Apparent Liability,

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 8 of 14

Forfeiture Order, or Admonishment from the Commission, or entered into a Consent Decree with the Commission.

20. Identify any efforts by the Licensee to resolve or correct any noncompliance with the Act or Rules prior to this LOI. Identify any efforts by the Licensee to disclose to the Commission any noncompliance with the Act or Rules prior to this LOI.
21. Identify all Station employees, representatives, or agents fired or otherwise disciplined for apparent violations of Section 317 or 507 of the Act or Section 73.1212 of the Rules and describe the apparent violations and disciplinary actions.
22. Provide a description by category and location of all Documents¹⁶ and tangible things that the Licensee has in its possession, custody, or control that are responsive to the questions herein.

Requests for Documents

23. For each Broadcast of Programming listed in the responses to Inquiries 10, 11, and 12 above, provide the following:
 - (a) two recordings of the Programming in DVD format and if the Programming was edited before Broadcast, two recordings of the unedited Programming in DVD format;¹⁷
 - (b) a written transcript of the Programming;
 - (c) any Documents that relate to such Programming, including e-mails, written agreements, marketing materials, or invoices;
 - (d) a recording of any sponsorship identification in DVD format;¹⁸
 - (e) copies of all written agreements and written accounts of all oral agreements that the Licensee and/or its employees, representatives, or agents entered into with any Person regarding the Broadcast of the Programming; and
 - (f) all Documents that relate to any such oral or written agreements Identified in response to Inquiries 10, 11, and 12 above.
24. Provide all Documents that relate to any payment of or promise to pay Consideration identified in response to Inquiries 10, 11, and 12 above.
25. For each Broadcast listed in the responses to Inquiries 10, 11, and 12 above, provide all Documents relating to the actions, if any, that the Licensee took to determine if Bianca Rae and/or Alexandra Pierce, referenced above in the introductory paragraphs of this letter, or any other Licensee employee, agent or representative had received or been promised Consideration by any Person in exchange for promoting or discussing that Person's products, merchandise, and/or services during Broadcast of any Programming.
26. Provide all documents related to the social media postings listed in response to Inquiry 16(d) above.
27. Provide a copy of all written policies and directives of the Licensee relating to the Licensee's

¹⁶ In responding to this inquiry, note the definition below of the term "Document" in the Instructions to this letter.

¹⁷ Clearly label each recording provided with the file number referenced above and the date and time of the Broadcast.

¹⁸ Clearly label each recording provided with the file number referenced above, the date and time that the identification was Broadcast, and indicate that the recording is a Broadcast identification of the Programming.

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 9 of 14

compliance with Sections 317 and 507 of the Act and Section 73.1212 of the Rules.

28. Provide a copy of all written policies and directives of the Licensee relating to Station Social Media Accounts.
29. Provide a copy of each affidavit, acknowledgement, or other certification concerning awareness of or compliance with the statutory and regulatory provisions governing payola and sponsorship identification contained in 47 U.S.C. §§ 317 or 508 and in 47 C.F.R. § 73.1212 executed by the by the following:
 - (a) Bianca Rae;
 - (b) Alexandra Pierce;
 - (c) all Licensee employees, representatives, or agents who supervised Bianca Rae and/or Alexandra Pierce;
 - (d) any Licensee employee, representative, or agent Identified in the responses to Inquiries 10, 11, 12, and/or 16, above; and
 - (e) any Programming Personnel who were materially involved in or participated in each Broadcast identified in response to Inquiries 10, 11, and 12 above.
30. Provide a copy of all contractual agreements between the Licensee and the following Persons relating to the employment of each:
 - (a) Bianca Rae;
 - (b) Alexandra Pierce; and
 - (c) all Licensee employees, representatives, or agents who supervised Bianca Rae and/or Alexandra Pierce.
31. Provide a copy of the Licensee's certificate of incorporation and a current certificate of good standing in the state in which the Licensee is incorporated.
32. Provide: (1) federal tax returns for the most recent three years; (2) financial statements prepared according to generally accepted accounting principles; or (3) some other reliable and objective documentation that accurately reflects the Licensee's current financial status.
33. Provide copies of all Documents that serve as the basis for or otherwise support the responses to all the Inquiries above, to the extent not already provided.

Filing Requirements

Affidavit Requirement. We direct the Licensee to support its responses with an affidavit or declaration under penalty of perjury, signed and dated by an authorized officer of the Licensee with personal knowledge of the representations provided in the Licensee's response. The affidavit or declaration must verify the truth and accuracy of the information therein, state that all of the information requested by this letter that is in the Licensee's possession, custody, control, or knowledge has been produced, and state that any and all documents provided in its responses are true and accurate copies of the original documents. In addition to such general affidavit or declaration of the authorized officer of the

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 10 of 14

Licensee described above, if such officer (or any other affiant or declarant) is relying on the personal knowledge of any other individual rather than his or her own knowledge, and if multiple Licensee employees contribute to the response, the Licensee shall provide separate affidavits or declarations of each such individual with personal knowledge that identify clearly to which responses the affiant or declarant with such personal knowledge is attesting. All such declarations provided must comply with Section 1.16 of the Rules¹⁹ and be substantially in the form set forth therein. Failure to support your responses with a sworn affidavit could subject you to forfeiture.²⁰

Delivery Requirements. The Licensee shall send its response by hand or messenger delivery, by commercial overnight courier, or by First-Class or overnight U.S. Postal Service mail.

If sent by messenger or hand delivery, the Licensee should direct its response to Marlene H. Dortch, Secretary, Federal Communications Commission, 445 12th Street, SW, Room TW-A325, Washington, DC 20554, to the attention of Melanie A. Godschall, Investigations and Hearings Division, Enforcement Bureau, Room 4-C330, Federal Communications Commission, with a second copy included in the delivery to Jeffrey J. Gee, Chief, Investigations and Hearings Division, Enforcement Bureau.²¹

If sent by commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail), the response should be sent to the attention of Melanie A. Godschall, Investigations and Hearings Division, Enforcement Bureau, Federal Communications Commission, 9300 East Hampton Drive, Capitol Heights, Maryland 20743, with a second copy included in the mailing to Jeffrey J. Gee, Chief, Investigations and Hearings Division, Enforcement Bureau.

If sent by first-class, Express, or Priority Mail, the response should be sent to Melanie A. Godschall, Investigations and Hearings Division, Enforcement Bureau, Federal Communications Commission, 445 12th Street, SW, Room 4-C330, Washington, DC 20554, with a second copy included in the mailing to Jeffrey J. Gee, Chief, Investigations and Hearings Division, Enforcement Bureau.

Electronic Copy. The Licensee shall also transmit a copy of the response via email to Melanie.Godschall@fcc.gov and Jeffrey.Gee@fcc.gov. The electronic copy shall be produced in a format that allows the Commission to access and use it, together with instructions and all other materials necessary to use or interpret the data, including record layouts, data dictionaries, and a description of the data's source.

Instructions

Request for Confidential Treatment. In addition to providing the requested information and documents, any request for confidentiality of certain information or documents must strictly comply with the requirements of 47 C.F.R. § 0.459, including a statement of the reasons for withholding the materials from inspection. The request must include a schedule of the information or documents for which confidentiality is requested that states, individually as to each such item, the information required by Section 0.459(b) of the Rules including, but not limited to, identifying the specific information for which

¹⁹ See 47 C.F.R. § 1.16.

²⁰ *SBC Commc'ns, Inc.*, 17 FCC Rcd at 7600, para. 28 (2002) (imposing \$100,000 penalty for failing to submit a sworn written response).

²¹ Originals and any copies of the response submitted via hand delivery or messenger must be held together with rubber bands or fasteners and must be submitted without envelopes. See Public Notice, FCC Announces Change in Filing Locations for Paper Documents, 24 FCC Rcd 14312 (2009).

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 11 of 14

confidential treatment is sought; explaining the degree to which the information is commercial or financial, or contains a trade secret or is privileged; and explaining how disclosure of the information could result in substantial competitive harm.²² Accordingly, a "blanket" request for confidentiality or a casual request, including simply stamping pages "confidential," will not be considered a proper request for confidentiality, and those materials will not be treated as confidential.²³

Claims of Privilege. If the Licensee withholds any information or documents under claim of privilege, it shall submit, together with any claim of privilege, a schedule of the items withheld that states, individually as to each such item: the numbered Inquiry to which each item responds and the type, title, specific subject matter and date of the item; the names, addresses, positions, and organizations of all authors and recipients of the item; and the specific grounds for claiming that the item is privileged.

Format of Responses. The response must be organized in the same manner as the questions asked, i.e., the response to Inquiry 1 should be labeled as responsive to Inquiry 1.

Method of Producing Documents. The Licensee shall submit each requested document in its entirety, even if only a portion of that document is responsive to an inquiry made herein, including all appendices, tables, or other attachments, and all other documents referred to in the document or attachments. The Licensee shall not edit, cut, expunge, or otherwise take any action to modify any document submitted in response to this LOI. In addition to any document the Licensee submits in response to any inquiry, the Licensee shall also submit all written materials necessary to understand any document responsive to these inquiries.

Identification of Documents. The Licensee shall identify all documents provided in response to these inquiries in accordance with this paragraph. The Licensee shall include a reference label on each document that identifies each document in sequential and consecutive numerical order and "Bates" stamp all documents (e.g., Company 01-000001, where "Company" is the responding entity, "01" signifying that the document is response to Question 1 of this LOI, and "000001" indicating that the document is the first page in a consecutively numbered range potentially reaching one hundred thousand). Elements such as these should be separated by dashes, as indicated. For each document submitted in response to this LOI, the Licensee shall provide an index indicating: the title of the document; the date of the document; the custodian from whose files the document was retrieved; the author and recipient of the document; and the corresponding reference label number assigned to the document. If any document is not dated, the Licensee shall state the date on which it was prepared. If any document does not identify its authors or recipients, state, if known, the names of the authors or recipients.

Documents Already Provided. If a document responsive to any inquiry made herein has already been provided to the Enforcement Bureau during this or any other investigation, identify each such document, when and how it was produced to the Bureau, and specify the Bates-number range for the document.

Documents No Longer Available. If a document responsive to any Inquiry made herein existed but is no longer available, or if the Licensee is unable for any reason to produce a document responsive to any Inquiry, identify each such document by author, recipient, date, title, and specific subject matter, and explain fully why the document is no longer available or why the Company is otherwise unable to produce it.

²² See 47 C.F.R. § 0.459(b).

²³ See 47 C.F.R. § 0.459(c).

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 12 of 14

Retention of Original Documents. With respect only to documents responsive to the specific inquiries made herein and any other documents relevant to those inquiries, the Licensee is directed to retain the originals of those documents for sixty months from the date of this letter unless (a) the Licensee is directed or informed by the Enforcement Bureau in writing to retain such documents for some shorter or longer period of time, or (b) the Enforcement Bureau or the Commission releases an item on the subject of this investigation, including, but not limited to, a Notice of Apparent Liability for Forfeiture or an order disposing of the issues in the investigation, in which case, the Licensee must retain all such documents until the matter has been finally concluded by payment of any monetary penalty, satisfaction of all conditions, expiration of all possible appeals, conclusion of any enforcement action brought by the United States Department of Justice, or execution and implementation of a final settlement with the Commission or the Enforcement Bureau.

In accordance with Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations, Second Report and Order, 27 FCC Red 4535, 4570-71, para. 74 (2012), unless and until otherwise instructed by the Commission, the Enforcement Bureau or their representatives, we hereby direct that the Licensee shall not place in its public file or upload to its online public file this letter, any supplements thereto, or any other correspondence from the Commission concerning this investigation, materials related to such inquiries, Licensee responses to these Commission inquiries, or any Documents in connection with such responses not otherwise required to be placed in the public file or uploaded to the online public file.

Continuing Nature of Inquiries. The specific inquiries made herein are continuing in nature. The Licensee is required to produce in the future any and all documents and information that are responsive to the inquiries made herein but not initially produced at the time, date, and place specified herein. In this regard, the Licensee must supplement its responses (a) if the Licensee learns that, in some material respect, the documents and information initially disclosed were incomplete or incorrect or (b) if additional responsive documents or information are acquired by or become known to the Licensee after the initial production. The requirement to update the record will continue for sixty months from the date of this letter unless (a) the Licensee is directed or informed by the Enforcement Bureau in writing that the Licensee's obligation to update the record will continue for some shorter or longer period of time, or (b) the Enforcement Bureau or the Commission releases an item on the subject of this investigation, including, but not limited to, a Notice of Apparent Liability for Forfeiture or an order disposing of the issues in the investigation, in which case the obligation to update the record will continue until the matter has been finally concluded by payment of any such monetary penalty, satisfaction of all conditions, expiration of all possible appeals, conclusion of any enforcement action brought by the United States Department of Justice, or execution and implementation of a final settlement with the Commission or the Enforcement Bureau.

Construction. The terms "any" and "all," "and" and "or," and "each" and "every" shall be construed inclusively to bring within the scope of the requests for information and documents all information and documents that might otherwise arguably be construed as outside the scope of the requests. Likewise, the singular of any word or defined term shall include the plural and the plural of any such word or defined term shall include the singular. The words "relating to" or "relate to" shall be construed to mean, whether directly or indirectly, in whole or in part constituting, containing, concerning, discussing, describing, analyzing, identifying, supporting, qualifying, confirming, contradicting, or stating.

Definitions

For purposes of this LOI, the following definitions apply. The definitions in this section apply regardless of whether the first letter of the defined term appears in upper or lower case.

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 13 of 14

"Broadcast," when used as noun, shall mean images or sounds or language transmitted or disseminated over a station during the course of a radio or television broadcast.

"Broadcast," when used as a verb, shall mean the transmission or dissemination of radio or television communications intended to be received by the public. The verb "broadcast" may be used interchangeably with the verb "air."

"Consideration" shall mean anything of value, including but not limited to, cash, checks, salary, fees, commissions, loans, management fees, consulting fees, honoraria, per diem allowance, payment of third-party invoices, travel and/or hotel expenses, clothing, shoes, jewelry, aesthetic services including hair and make-up, meals, gifts, bonuses, stylists' services, other services, the purchase of, or promise to purchase, advertising time, and/or any other thing of value, from any source, or given by third parties, to another.

"Document" shall mean the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, punched, computer-stored, electronically-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made.

"Identify," when used with reference to a person, shall mean to state his or her full legal name, job title (if any), current business address, business phone number, and e-mail address. If business address or telephone number are not available, state the person's home address and telephone number.

"Identify," when used with reference to a Document, shall mean to state the date, author, addressee, type of document (e.g., the types of document, as described above), a brief description of the subject matter, its present or last known location, and its custodian.

"Identify," when used with reference to an entity other than a person, shall mean to state its name, current or last known business address, current or last known business telephone number, and e-mail address.

"Gulf-California" shall mean Gulf-California Broadcast Company, the Person which is the licensee of the Stations and any predecessor-in-interest, or wholly or partially owned subsidiary.

"Licensee" shall mean Gulf-California Broadcast Company, and any predecessor-in-interest, affiliate, parent, wholly or partially owned subsidiary, other affiliated company or business, and all owners, including but not limited to, partners or principals, and all directors, officers, employees, or agents, including consultants and any other persons working for or on behalf of the foregoing at any time during the period covered by this LOI. Although this LOI refers to Licensee to collectively include each person or entity listed in this definition, any responses must specifically detail and distinguish between the actions or responsibilities of each entity.

"Person" shall mean any individual, entity, business, company, association, or organization.

"Programming" shall mean audio/video content of any type or format, including, but not limited to interviews, news-style coverage, entertainment programs, documentaries, and informational programs but shall exclude commercial spot advertisements of 60 seconds or less in duration that are displayed during program breaks in accordance with standard industry practice.

J. Timothy Hannan
Gulf-California Broadcast Company
July 25, 2016
Page 14 of 14

"Programming Personnel" shall mean employees who are on-air talent and/or materially participate in the on-air broadcast of program material or in programming decisions including management, direction, creation, planning, production, approval, and their supervisory employees.

"Station" shall mean any station licensed to Gulf-California, including the following: Station KESQ-TV, Palm Springs, California, FID 25577; KCWQ-LD, Palm Springs, California, FID 167761; KCWQ-LP, Palm Springs, California, FID 130100; KDFX-CD, Indio/Palm Springs, California, FID 51207; K27DS, Yucca Valley, California, FID 25576; K31MF-D, Yucca Valley, California, FID 186768; K42LC-D, Yucca Valley, California, FID 186844; KPSP-CD, Cathedral City, California, FID 10535; KUNA-LP, Indio, California, FID 19779; KUNA-LD, Palm Springs, California, FID 167763; KYAV-LD, Palm Springs, California, FID 2961.

"Station Social Media Account" shall mean the following: www.twitter.com/Bianca_Rae; www.instagram.com/bianca_rae; www.facebook.com/Bianca-Rae; www.twitter.com/@_APierce; www.instagram.com/the_alle_cat; www.facebook.com/alexandraepierce; and any other social media account established by Programming Personnel of Gulf-California and/or the Station for related to the Station and their employment.

ATTACHMENT B

Best City Nails
74520 CA-111 B2
Palm Desert, CA 92260

Bohimi Couture
73020 El Paseo, Suite 102
Palm Desert, CA 92260

Diane Von Furstenberg
Desert Hills Premium Outlets
48400 Seminole Drive, #229
Cabazon, CA 92230

Effortless Chic Boutique
73560 El Paseo
Palm Desert, CA 92260

El Paseo Jewelers
73520 El Paseo
Palm Desert, CA 92260

Grayse
73130 El Paseo
Palm Desert, CA 92260

José Eber Rancho Mirage
Ritz Carlton Rancho Mirage
68900 Frank Sinatra Drive
Rancho Mirage, CA 92270

Le Chateau Boutique
78-010 Main Street, Suite 102
La Quinta, CA 92253

Michael Costello Designs
180 E. Andreas Road
Palm Springs, CA 92262

My Little Bridal Boutique
865 North Palm Canyon Drive
Palm Springs, CA 92262

Patrick Marchesson Salon
74855 Country Club Drive
Palm Desert, CA 92260

Pernilla Linner Silversmith
La Quinta, CA

Presage

73-811 El Pasco
Palm Desert, CA 92260

The Jewelry Bar
73255 El Pasco
Palm Desert, CA 92260

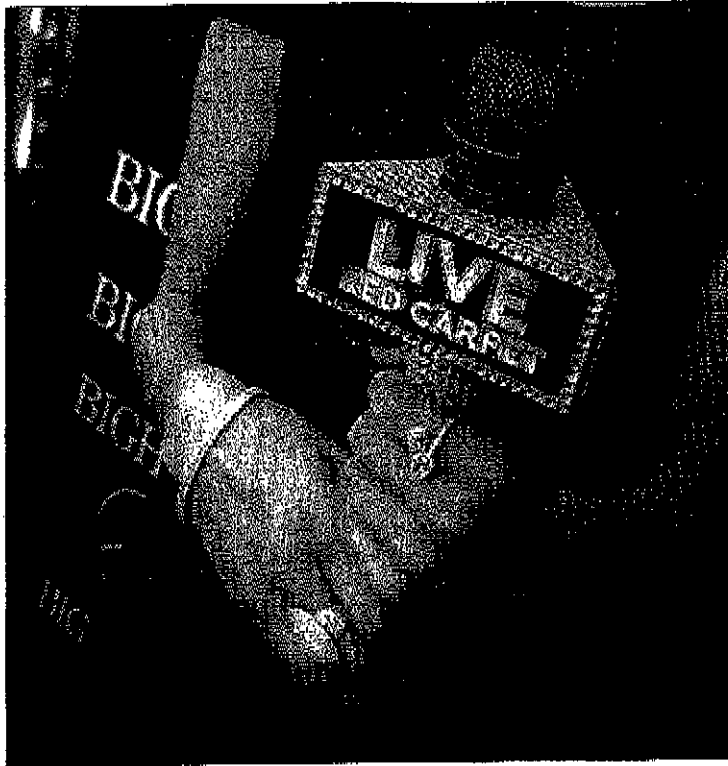
Marina BerBeryan
(Stylist)

Celi That Girl
(Stylist)

Lynnee LaVoie
(Make up Artist)

Vanessa Puccini
(Fashion Designer)

ATTACHMENT C



blanca__rae
Palm Springs Convers...

Follow

102 likes

20w

blanca__rae Almost 1000 crystals on the mic, 27 carats on me. @kentkaycreative and Raju from El Paseo Jewelers...
Thank you!

ardstone You looked awesome! And you got to interview Magnet!!!

kentkaycreative @blanca__rae
#KsAAADream }

jadebugskideboutique You know you made it when they give you 27 carats to wear. ♡
congratulations. You are fabulous.

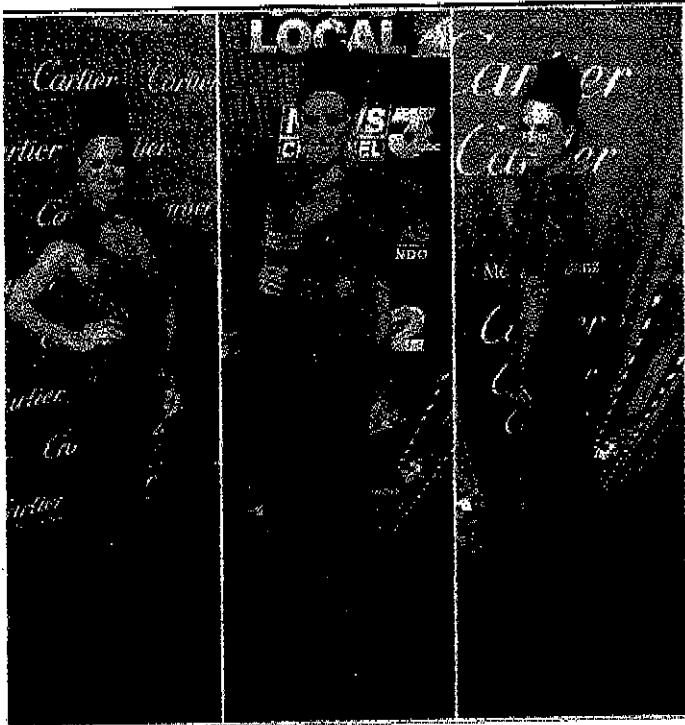
bobbymguerr! Lol

theonlyisatufano Oh, no big deal...

blanca__rae @theonlyisatufano I know right, dying!!!

Log in to like or comment.

40



LOCAL

blanca__rae

Follow

123 likes 72w

blanca__rae So thankful for the opportunity to wear this dress by @mireille_dagher
Styled by @marinaberboryen

krystle.kelley Love ♥♥

athenababy24 Beautiful! 🌟

dauidgonzalezty #GreatJob 🌟 i 🌟 xx

extrachrisb Beautiful choice

terahjode Perfection!

j2181 Perfect choices @blanca__rae xx

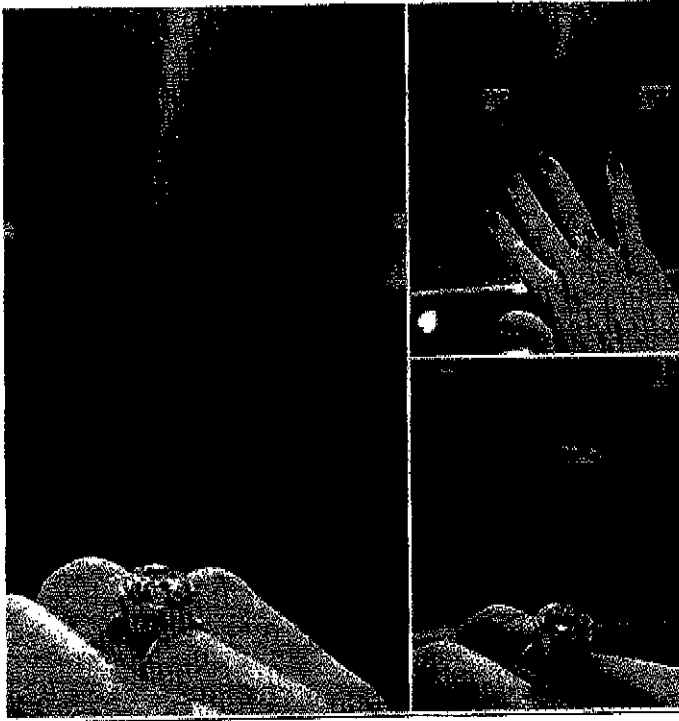
smkeutz 🌟🌟🌟

xdipex Beautiful

marinaberboryen I'm glad you liked it! You looked stunning Bianca! 🌟🌟

onetakestage OMG!! 🌟🌟

Log in to like or comment.



bianca__rae
KESQ Girl California...

Follow

64 likes

18w

bianca__rae Loving this @pernellalines ring and how it shines on set this morning!! Check out her collection, you'll fall in love...
-> @pernellalines

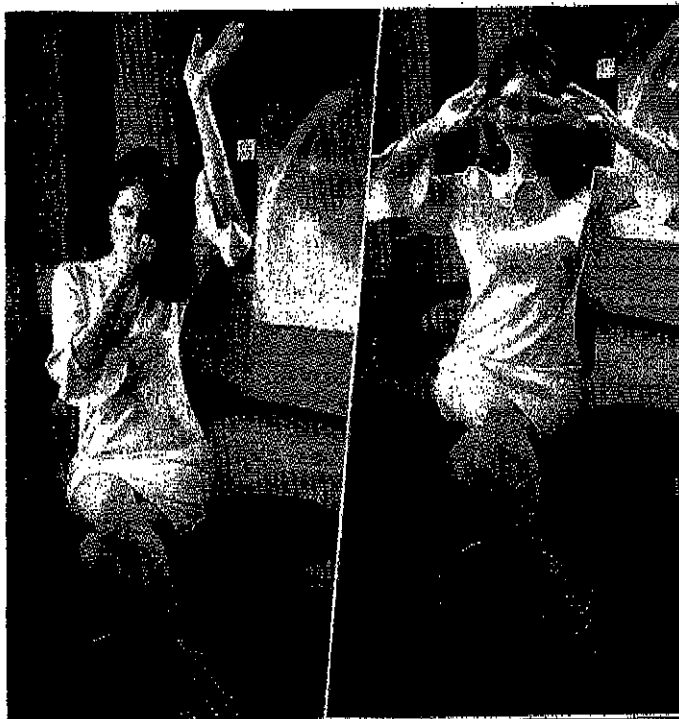
lexiframnessinthezoo For a minute I thought this was an engagement post haha but I then realized its your right hand @

bianca__rae @lexiframnessinthezoo haha oh man I didn't even realize that is what it does look like! Right hand right hand!!

lexiframnessinthezoo Haha I miss you B❤ hope all is well!!

Log in to like or comment.

...



bianca__ree
KESQ Gulf California ...

Follow

115 likes

15w

bianca__ree According to @jerrysteffen,
and everyone else, I took "groovy" today..
Dress: @mkgrayze @grayseelpaseo
Earrings: @thejewelrybar @ttd

artiststone Tell Jerry the ball is in his court
now. Lol

bianca__ree @jerrysteffen the ball is in
your court now ☺

jerrysteffen Okay... I guess it's gonna be a
tie-dye, bell bottoms, granny glasses kind
of day tomorrow morning!

bianca__ree @jerrysteffen ok you got that
@tyjefstahl ??

bianca__ree : @jerrysteffen @tyjefstahl
williamsolazar500 Beautiful

nevermartyred I really like the shoes! ☺

joy.2410 Love the dress @bianca__ree

Log in to like or comment.

...



bianca__rae

Follow

86 likes

16w

bianca__rae Rocking this
 @graysseepaseo @mkgayse dress in
 Rocky's desert home today with
 @hurwitzjamesco realtor @joshreef
 Jewelry @thejewelrybar

Look inside Sylvester Stallone's home on
 Feb. 25th at 5:00 ONLY on News
 Channel 3. Sneak peeks throughout the
 month here on insta ☺ fun day with you
 @rtflicker !!

miss.jasmine.nicole Oh!! Josh! This is
 wonderful!

whalenproductions 🌟🌟🌟
 @bianca__rae

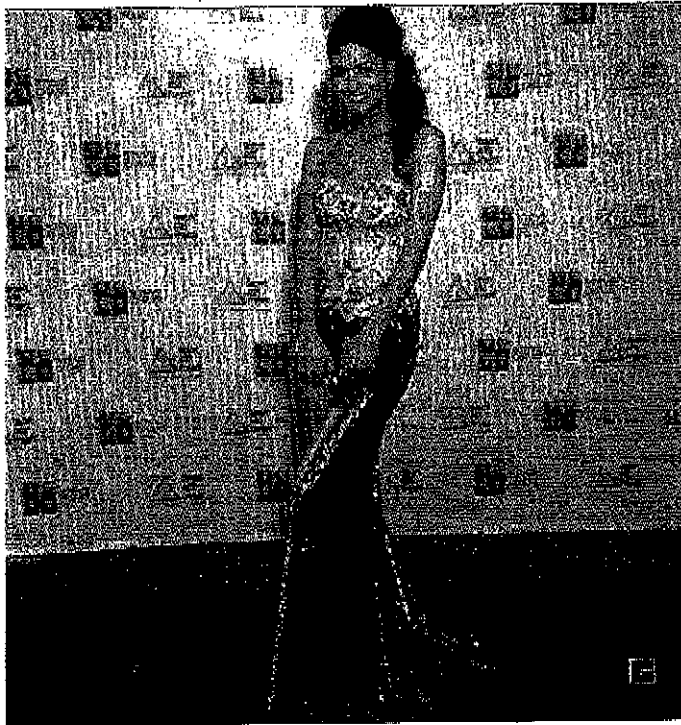
ryanryanna So very hot.....
 @bianca__rae

ryanryanna Stunning
 @eridanusandcassiopeia

eridanusandcassiopeia @bianca__rae

Log in to like or comment.

...



Bianca__rose
Steve Chase Awards...

Follow

172 likes

15w

Bianca__rose Steve Chase Awards!
Gown: @mylittlebrideboutique
Purse: Toni Ackerman
Hair: @asville Jose Eber Ritz-Carlton RM
MU: @michelebeautydesign
Jewelry: @michelejewels from
@the.jewelry.bar @riyanyerjewelry
@stevechasegala #schaspotlight

Glam coordination: @mimasi123

lilieprendevente Always gets it right!
Stunning @bianca__rose!

bobbymguerra Look at this beautiful girl...

discount_mattress_warehouse Awesome
a dress for Palm Springs

mazucha17 Love the gold on you!!!

_meredithkay Gorgeous!

anetaj17 You are beautiful!!!!!!

the_alle_cat Lookin' great B!

Log in to like or comment.

...



blanca__rae
Steve Chase Awards..

Follow

85 likes

15w

blanca__rae My excitement level was high when I interviewed @chokaikhan and her stylist. 📸 Can't wait to see her perform (nile!!) @stevechaseawards #schaspotlight

Log in to like or comment.

...



bianca__rae

Follow

31 likes

65w

bianca__rae Et Online Fashion Contributor, Celebrity Stylist and desert resident... I *... @stylistsalvador and I sit down one more time after Hollywood's biggest night to talk best and worst dressed at the #oscars. See our picks take on Eye On the Desert at 6:45 CBS Local 2. #fashion #Oscars2015 #redcarpet #stylist #enews #redcarpet #online @online @palmspringstyle

stylistsalvador. It's a great one! A must watch! [Link](#) I

...incredibly @bianca__rae very beautiful! fashionably_yoursxoxo Gorgeous! ♥ all your pics doll ☺

Log in to like or comment.

...



bianca__rae

Follow

106 likes

55w

bianca__rae Post #oscars #LOTD only thing I may like better than my pick for Best Dressed last night...is this shirt! ☺
Shirt @bebe_stores @bebepr_lgirl
asparkle #featherandlace

the_olfe_cat Love that look B!!!
@bianca__rae

ariststone Beauty! ☺ @

mrsopstf Love your dress!

fadye_and_me You look fabulous! ☺

aubreyonair Love this look!

@bianca__rae

fancycorrectitude Wow babe you look absolutely stunning

bianca__rae @fancycorrectitude thank you!! ☺

gbetts Amazing.

dailyfeather @bianca__rae I love this
(caption) #oscars #LOTD

Log in to like or comment.

...



bianca__rae
KESQ Gulf California ...

Follow

91 likes

12w

bianca__rae We're at it again! Talking best and worst dressed at the #Oscars2016 with @onlinefashioncontributor @stylistasalvador...only on News Channel 3 at Noon! Love you, Sal! 🌹

Dress/styled by: @bebe_stores El Paso
...meredithkay Y'all look fabulous-gorgeous
@bianca__rae

stylistasalvador @bianca__rae so much fun!
Thanks for having me!!! 🌹🌹🌹

trendguy We 🌹🌹🌹 @stylistasalvador
ardstone And best dressed goes
toooo...Bianca! 🌹🌹🌹

mannfolkpr love your black and white
dress!

Log in to like or comment.

000



bianca__rae

Follow

77 likes

62w

bianca__rae #repost The #Greek and #Italian! Interviewing @michaelcastello for @fashionweekpaseo at his showroom in LA. Wait until you hear what he has planned for us at #FWFP. I'm talking something they didn't even see at @mlfashionweek ... Stay tuned for my story ... Skirt: @bebe_stores shirt: @whbm

cynaraha Are you wearing the @stuzfashion skirt?

bianca__rae @cynaraha no the skirt is @bebe_stores!

cynaraha @bianca__rae it looks exactly like the one @stuzfashion designed last year. It's identical..

jill_us @bianca__rae @michaelcastello would love to be a part that AMAZING SHOW at #FWFP

jill_us @bianca__rae @michaelcastello

Log in to like or comment.

...



bianca__rae

Follow

63 likes

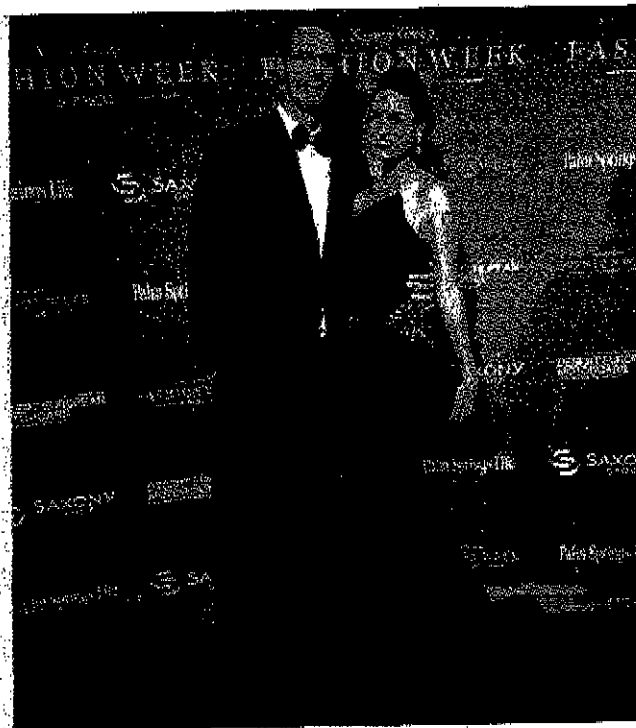
52w

bianca__rae She caters celebrity birthday parties and recently had Sharon Stone over for dinner. The salad she made me almost looked too good to eat. Almost. Obviously I ate it and it was amazing. Find out what @lupowers and some other power women chefs have planned for Food & Wine Festival Palm Desert...tonight only on Eye On the Desert!

Skirt: @belle_stores #chefs #foodandwine
angelasfantasycreations Love the skirt
teasetbrsky Two awesome ladies!
@bianca__rae @lupowers

Log in to like or comment.

009



bianca__rae
Fashion Week El Pas...

Follow

111 likes

61w

bianca__rae "What makes a @michaelcostello gown a Michael Costello gown is the woman wearing it. She not only exudes sex appeal and self-confidence, but she demands attention when she walks into a room so all eyes are always on her. You can always tell there's something different about your woman when she's wearing a Michael Costello gown." -Michael Costello, in our one-one-one interview.

Gown and his bow tie: @michaelcostello
rosa_vargas And I love the one too!
Beautiful!

vendylalene You look fabulous darling
!!

_meredithkay @bianca__rae stunning
bebe

pecei You look stunning !

Log in to like or comment.

0/0



bianca__ree
KESQ Gulf California ...

Follow

103 likes

10w

bianca__ree Top to bottom, love this outfit! Styled by @trappednfashion in @trinatürk ... giving out styling and fashion tips tonight at Tina Türk in Palm Springs 4-6, come say hi! #told

official_ryanhwolf A++

stark_eez Great pants.

kellygolightly Cutie! We'll be there!

rodzlaroddy Big Hair Don't Care! 🍷

artlatone. Televisions most stylist! 🍷

angelag1983 Love this!!!

trinatürk 🍷 I like the mini beehive do!

_ashleye316 I admire you so much I love that outfit! 🍷

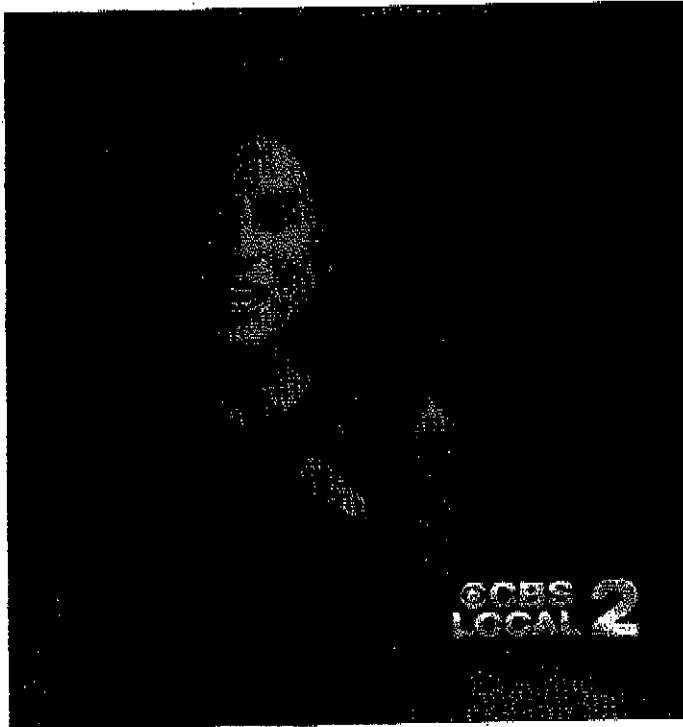
bianca__ree @_ashleye316 thank you!!!! 🍷

bianca__ree @artlatone thank you 🍷

bianca__ree @rodzlaroddy never care about big hair. 🍷

Log in to like or comment.

...



bianca__rae

Follow

90 likes

55w

bianca__rae CBS Local 2 Weekend News
Dress: @qv
@_cath_a_la_mode
#newsanchor

bianca__rae Photo cred: mom :)
@sharbragoutos

lexie33166 Gorgeous! Come home!
sockconclerge Check us out! We think
you'll love it

hermini731 Hey @bianca__rae where are
you based? Is this CBS district 2?

bianca__rae @hermini731 I am in Palm
Springs, California. I'm the CBS Local 2
weekend evening anchor!

hermini731 @bianca__rae well your
awesome! Do they let you do your own
stories? Or usually pick what you can do?

Log in to like or comment.

...



bianca_rae

Follow

128 likes

57w

bianca_rae Tonight on CBS Local 2
News... Shirt: @babe_stores
Skirt: @bcbg
Shoes: @whim
#newsanchor #journalist #fashionblogger

sjs3

Jay.2410 Beautiful

greeneyes278 Gorgeous ♥

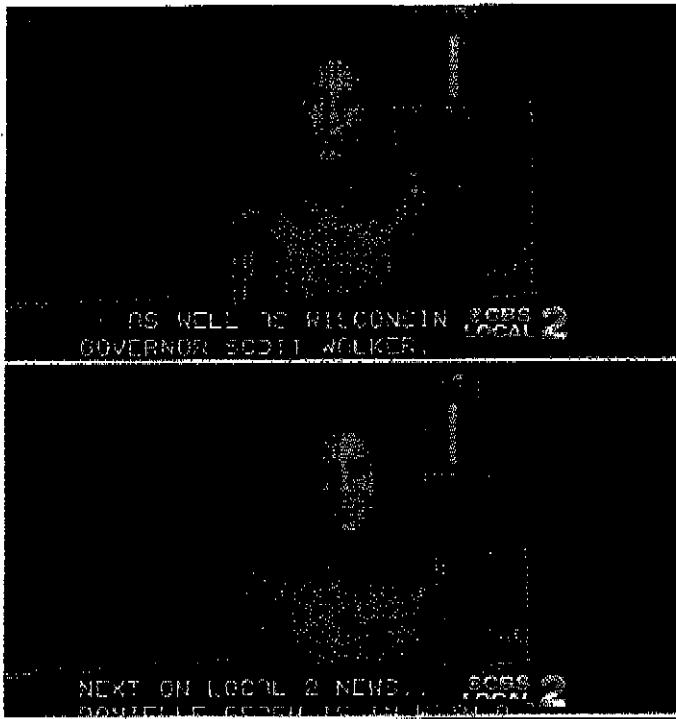
senzashoppingnonsostare Pretty ☺

@bianca_rae

michnell2 Classy

Log in to like or comment.

100%



bianca__rae

Follow

89 likes

57w

bianca__rae One of my favorite colors.
Tonight on CBS Local 2 dress: @dyf styled
by @_celi_a_la_mode

cbello32 Just saw you today for the first
time. I was amazed how beautiful your eyes
are. :) @bianca__rae

cbello32 Come to Kaiser grille in palm
desert someday. :) I work Saturdays :)

_celithatgirl Gorgeous!! ☺

josi92260 Gorgeous in green 🍀 love the
new doo. 🍀

official_ryanwolf 🍀

monday_blooms 🍀

bianca__rae @josi92260 thank you!!

kerat_cake @bianca__rae interested in a
piece?

greeneyes278 Mine too 🍀🍀🍀🍀

Log in to like or comment.

...



blanca__rae
Dolby Theatre

Follow

88 likes

Sw

blanca__rae And it all begins at the @americasidol finale. Just talked to @chriskaughy, Season 5 contestant. This serious moment about his idol memories captured right before convo turned to roadrunners in Palm Springs and our December 28th twin birthdays. 🎉 Great family guy, hear from him on News Channel 3 live at 5.

Thanks @terpsphotos and @kentkeycreative!
Romper/shoes: @bebe_stores
camerasqueens619 Omg I Love him 🥰
👉 So Jelly 🥰

dailyfeather @blanca__rae those shoes 🥰🥰

askimo000 I love your style and so does my daughter!!

artisttione Those heels are on point miss 🥰🥰🥰

Log in to like or comment.

870



bianca__rae

Fellow

102 HKS

5514

blanca...ree Tonight on CBS Local 2
News: Thousands coming together in
Baltimore after six police officers were
charged in connection to the death of
Freddie Gray... Congressman Ruiz trying
to improve water and sewage in
Mexico... Before the night's capped off
by the Mayweather-Pacquiao fight in
#Vegas, it's still or go home time in the
#NBA playoffs and we have a live report
from the Spurs-Clippers game. See you
at 5:30, we have a lot to talk about!
#newsandher

Styler by @_cel_@_iz_made

rodzilaroddy @tempacquire 121

palmpringstyle Love your dress!

christinarapken You look beautiful!

barbarosgoutos Aaasemmmmmmaaaazzz
ziilnnggg!!!

Log in to like or comment.



bianca__rae
KESQ Gulf California...

Follow

113 likes

4w

bianca__rae Feeling all pink and girly at work today 🍷

Dress: @grayseelpaseo #told

Lipstick: Candy Yum Yum @mescosmetics

michaelkurliva 🍷🍷🍷🍷

thedebertbuckeye Nice @mizay :)

_meredithkay @bianca__rae

@grayseelpaseo gorgeous dress on you!!

kroesnews 🍷🍷

aje3 Hello gorgeous 🍷🍷

bianca__rae @aje3 thanks babe!!

bianca__rae @kroesnews 🍷🍷

bianca__rae @_meredithkay thanks med!

grayseelpaseo 🍷🍷🍷🍷

calieljah 🍷

bianca__rae @calieljah :)

Log in to like or comment.

...



bianca__rae
KESQ Gulf Califorme

60 likes

bianca__rae Good morning
time is now to learn about a
construction (road repairs) &
closures (Stagecoach) so ye
in traffic. See you back on t
at Noon...turn it on and turn
Blazer: @grayseelpaseo

Log in to like or comment.



blanca__rae
CBS Local 2

Follow

74 likes

54w

blanca__rae Tonight on CBS Local 2
News...

Dress: @dvt #DVF

Styled by @_celithatgirl

#LOTD #NewsAnchor

williamsaezer556 Looking Beautiful!

vintage.eml_96 Did you bet the email my
mom sent

blanca__rae @vintage.eml_96 yes! I
forwarded it to my producer :)

Log in to like or comment.

400

**FEDERAL COMMUNICATIONS COMMISSION
ENFORCEMENT BUREAU****INVESTIGATIONS AND HEARINGS DIVISION**

445 12th STREET, S.W. ■ WASHINGTON, D.C. 20554

TEL: (202) 418-1420 ■ FAX: (202) 418-2080

FACSIMILE TRANSMISSION

DATE:

7/25/2016

TO:

Mr. Mike Stutz, General Manager
Smif-California Broadcast Company

Fax number:

(760) 343-3512

Telephone number:

(760) 773-0312

FROM:

Melanie Gadschall, Esquire

Telephone number:

(202) 418-7259

IMPORTANT: This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is confidential, privileged, and/or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE:pages 41-78 of 151 page fax (excluding cover sheet)

TOTAL NUMBER OF PAGES IN THIS FAX : _____ (including this cover page)

IF THERE IS A PROBLEM WITH THIS TRANSMISSION, PLEASE CALL (202) 418-1420.



bianca__rae
Palm Springs, Califor...

Follow

117 likes

2w

bianca__rae What is the future of Palm Springs? Will Marilyn come back? Who does Mayor Moon hope to host in his city as the next President of the United States? I have the answers in an exclusive interview tomorrow on KESQ News Channel 3 at 5:00. #StateOftheCity @berflicker Thank you @grayseelpisgo for letting me wear this mod PS dress!

bgoulou Beautiful dress!!

frenchtangerine Your hair looks wonderful!

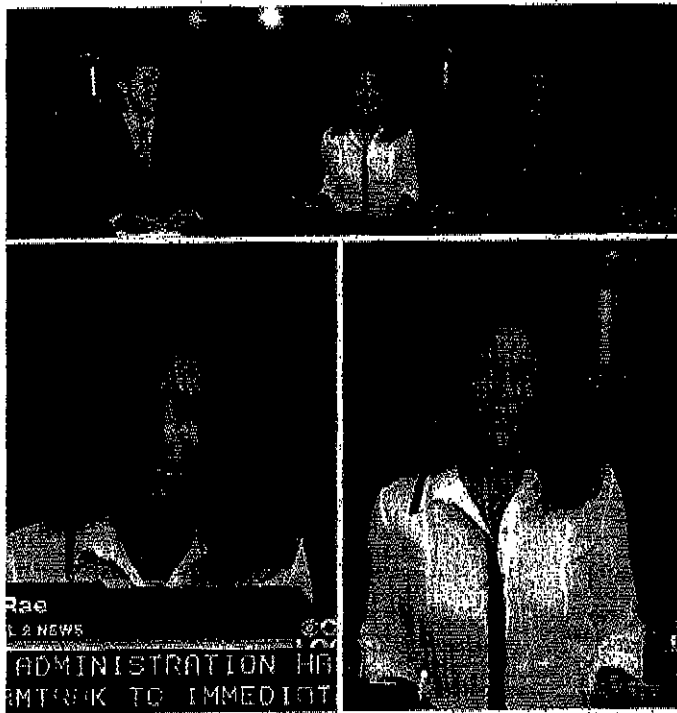
artiststone Bianca 🌟🌟🌟🌟

palmypoolgirl This city is getting crowded enough

paul_michael_2 You so beautiful Bianca ;)

Log in to like or comment.

...



bianca__rae
CBS Local 2

Follow

85 likes

53w

bianca__rae Tonight on CBS Local 2 News Weekend Edition. Blouse: #dvr #DVF styled by: @_calithatgirl We'll see you tonight at 11 for your latest news, weather and sports!

dodgefansince1971 @bianca__rae hair is on point tonight.

kroasnews Love the shirt B!

bianca__rae @dodgefansince1971 I hope I can get it like this again...replication is the hardest thing ever!!!

bianca__rae @dodgefansince1971 and thank you!!

_calithatgirl Love! @


kellygotlightly Love the new 'do!

bianca__rae @kellygotlightly thank you!

Log in to like or comment.

306



 Blanca__ree
KESQ Gulf California ...

Follow

26 likes

2d

blanca__ree Good morning! Today's
4GTD

Thank you @jmcclaughlinny for letting me
wear this navy dress!

spabrat Love a dress with pockets. Super
cute!

artistone Haaaaaay!

lesleyr11 Love this dress on you, Blanca,
you look fabulous in all our fun J
McLaughlin clothes!

aubreyonair Loveeee this look!
@blanca__ree

Log in to like or comment.

...



blanca__rae
CBS 2

Follow

128 likes

5h

blanca__rae Tonight on CBS Local
2...dress, jacket and necklace: @stjohnknits
See you tonight at 11:00! #cbslocal2 #lots
#gold #NewsAnchor

dan_loi_germany 🇩🇪

mikeluna_ Nice picture @blanca__rae 📸

adamischw @stjohnknits

sjs3 St. John 📺

bigboyzconstruction32 Looking great like
always!!

_meredithkay Love this outfit @stjohnknits
@blanca__rae

bgoutos Pure class!!

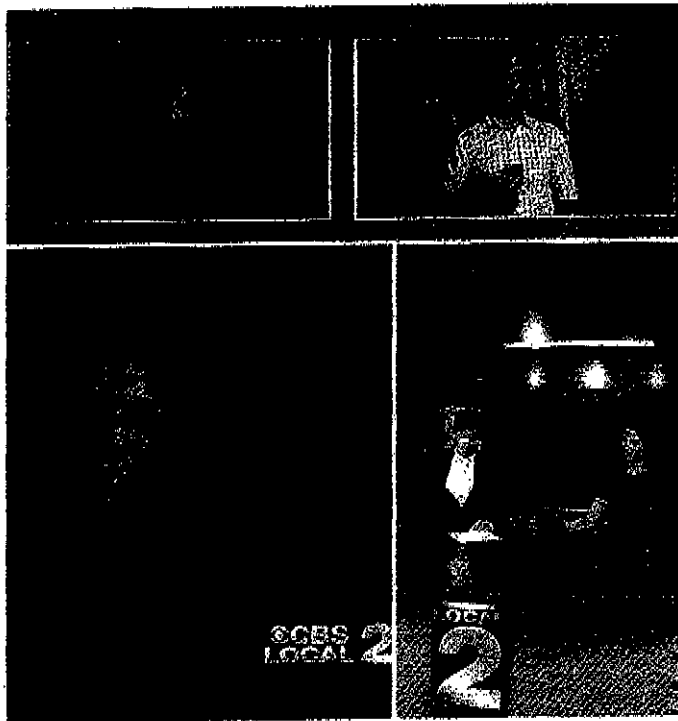
trishd713 Beautiful B!!

williamsalazar598 Beautiful Bianca

silvieboonfiglioli Very elegant

Log in to like or comment.

...



bianca__rae
CBS Local 2

Follow

97 likes

50%

bianca__rae A lot going on tonight on CBS Local 2 News at 6:30: A live report from a fire in India and an update on #AmericanPharoah See you tonight at 11:00 for your latest news, weather and sports! shirt: @dvt #dvt @celithstgirl #NewsAnchor #ltd #gold

dantellegerah Missing my counterpart! Looking gorg as always 🌹


bianca__rae Missing you dan!!! Can't wait to hear about your #croatianvacation ;) xo @dantellegerah

doublee66 Looking good Bianca. 🌹

bianca__rae Thank you @doublee66!

Log in to like or comment.

...



blanca__rae
KESO Gulf California ...

Follow

80 likes 2d

blanca__rae Friday #fashionrownd
Thank you @grayseelpaseo for letting me
wear these two beauties this week!

christinestein @ I'm having a hard time
choosing which I want more. 😊

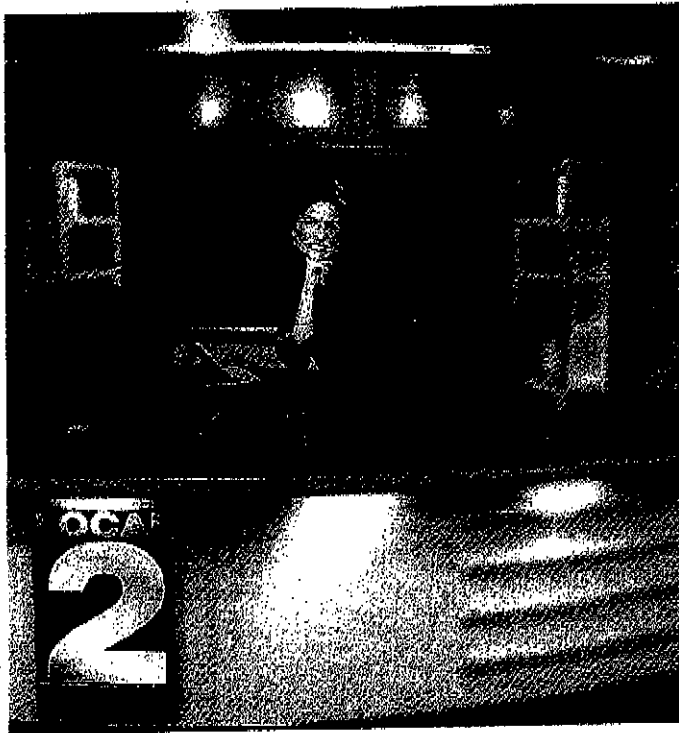
williamsalazar598 Beautiful!

blanca__rae @christinestein you'd look so
great in both!!

jorgechicles911 Happy great weekend

bgoutos Beautiful!!

Log in to like or comment



bianca__rae
CBS 2

Follow

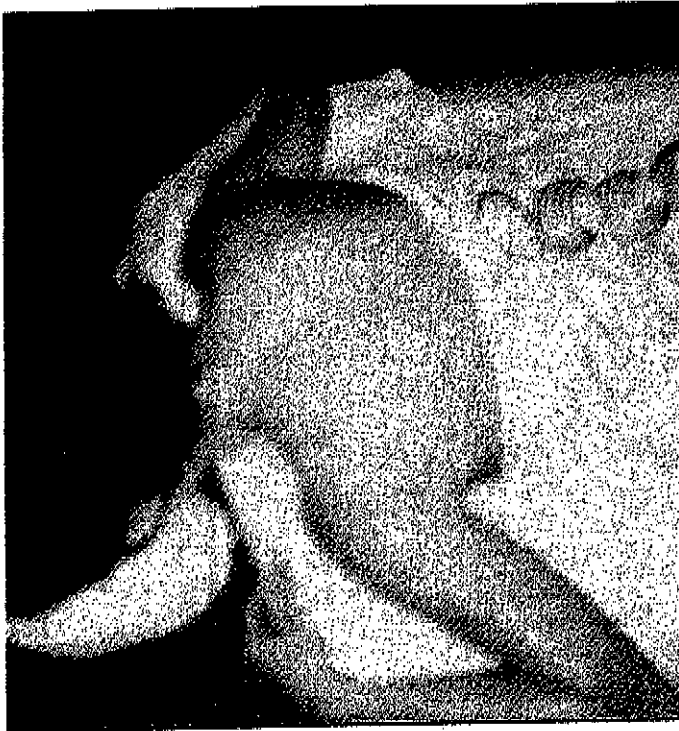
122 likes

45w

bianca__rae Dad was right. If you love your job... ❤️ #NewsAnchor #cbslocal2 #palmsprings
Blouse: @dyl #dyl
williamsalazar598 Breaktime...
marinabarberyari 🌹🌹🌹 miss you D! You look fab as always!

Log in to like or comment.

45w



bianca__rae

Follow

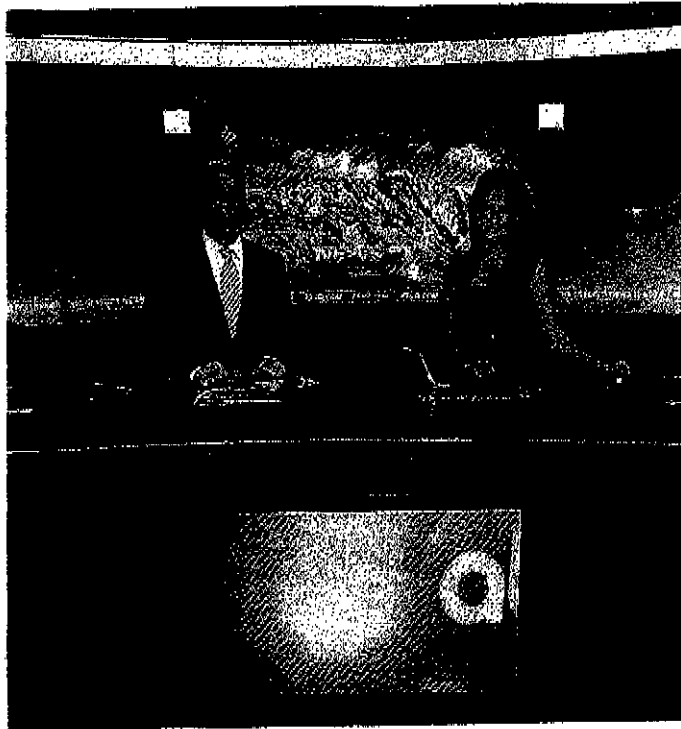
32 likes

28v

bianca__rae Think hot stone massage but better, because these 120 degree lava shells stay hotter longer than stone. Find out where you can get this unique spa treatment Wednesday night on Eye On the Desert! #eyeonthedesert
williamsalazar598 Why the hell?

Log in to like or comment

9/9



bianca_ree
KESQ Gulf California ...

Follow

111 likes

47w

bianca_ree KESQ News Channel 3 in
the morning...see you back here at noon!
#morninganchor #MorningShowLife
#NewsAnchor
Dress: @alltathari

cyreia_s Elle Tahari + Calvin Klein =
morning anchor gal'sbff ☺
swimfluents cyreia_s @bianca_ree
rockstors

vnsapuccini Amazing Bianca 🌟🌟
Congratulations again!!

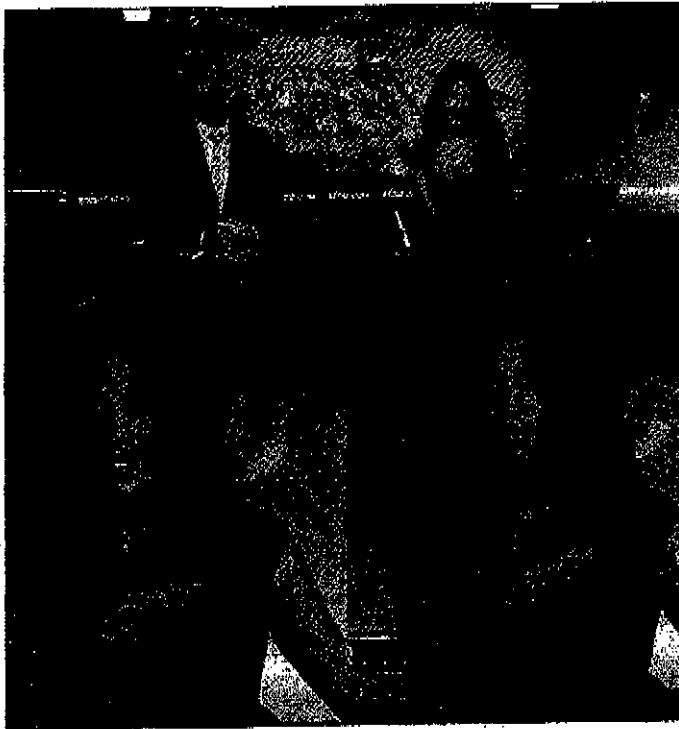
mrsmikeylow Congratulations beautiful
girl. Wishing you all the success in the
world. 🌟🌟🌟

the_alle_cat Lol Jeff cheesin so hard!
You guys look wonderful 🌟🌟

desertwebber @bianca_ree you are a
natural! #keepDoingwhatYoudo
#DesertMiddleMen

Log in to like or comment.

...



bianca__rae

Follow

109 likes

15w

bianca__rae Today on News Channel
3...dress; #dvt #dvt @_celihatgirl
#NewsAnchor

rodzillaroddy Looking good as always 🌟

aisamariacornalesdesigns So pretty!!!

marinaberberyan Hello gorgeous!!!

artiststone Awesome to see you as morning
anchor!

bianca__rae Thank you!!! @artiststone

@marinaberberyan

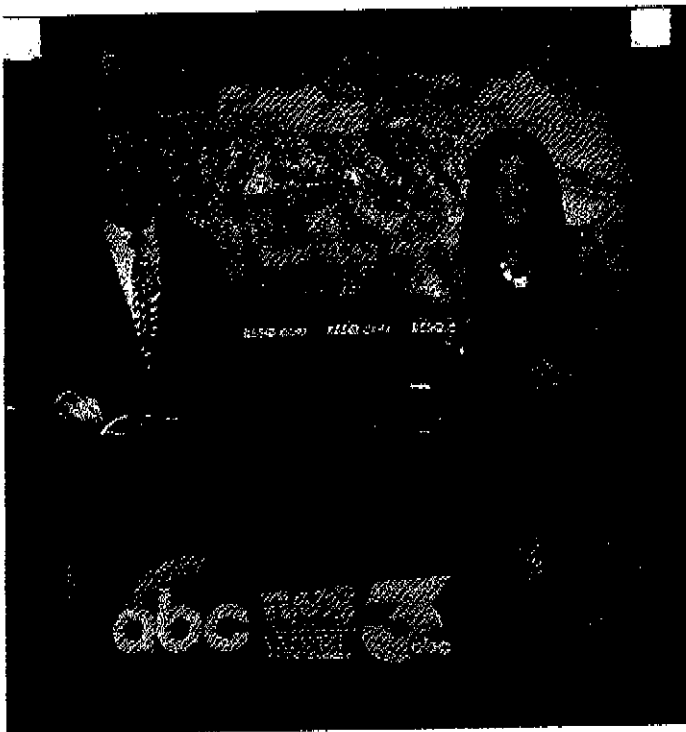
@aisamariacornalesdesigns @rodzillaroddy
:)


coachellaeyewear Our favorite news
anchor! 🌟

bianca__rae @coachellaeyewear thank
you!!

Log in to like or comment.


9 x 6



 bianca_rbe
KESQ Gulf California...

[Follow](#)

52 likes 45w

bianca_rbe It was all  at the KESQ News Channel 3 in the Morning desk today. Did you catch us this am? We'll be back at noon with your latest news and weather...hope you join! @tjefstoph @jerryteffen
Dress: @dvi #dvi

[Log in to like or comment.](#) 000



blanca__rae
KESQ Gulf California

Follow

78 likes

43 yr

blanca__rae Wild weather...I'll leave that to @daniellegersh but the lighting sure is swell for today's #LOTD 📸 Dress: Felicity & Coco from @nordstrom Rack

Shoes: @bcbg Hair: @justblowdrys

ps92264 Looking fab indeed

daniellegersh 🙌🏻

cooolocal5 Looking pretty (an these days... and awfully fit! :))

nevermartyred 🙌🏻

131_rj So sexy

alyssa.doblanco u r so very pretty! 🙌🏻 love ur clothing!

blanca__rae @alyssa.02 thank you so much!

alyssa.doblanco no prob!

Log in to like or comment.

See



bianca__rae
KESO Gulf California ...

Follow

111 likes

45%

bianca__rae Today on KESO News
Channel 3 in the Morning...*** Dress:
@topshop

lotusflowmovement Knockout sunshine
++*

dodgerfansince1971 @bianca__rae can
you send my friend @gabe_mata... a
"welcome Home" Instagram message.
He just arrived from Japan on the USS
GEORGE WASHINGTON.

mzaucha17 Love your dress, B!!!! My
favorite color 🍷

dodgerfansince1971 @bianca__rae
thank you.. You are the best...

bianca__rae @dodgerfansince1971
thanks :)

bianca__rae @mzaucha17 yellow always
makes me think of you!!

bianca__rae @lotusflowmovement.

Log in to like or comment.

0/90



blanca__rae
Dancing with the Stars

Follow

113 likes

25w

blanca__rae Thank you @bebe_stores
Et Paseo for styling me for last night's
@dancingabc premiere. The outfit was a
hit...and so much fun to wear!! @ #dwts
#bebe #told

thedarlingniki @blanca__rae I'd love to
style you in the future!

davidgonzaleztr ●●●●

sjs2 Loving this look and you! 😊

artistone You already won in my eyes 😊
😊😊😊

jsimon2 🌟🌟🌟 Crazy perfection!! So so
beautiful! 🌟🌟

jsimon3 🌟🌟 These shoes!

narendraregm14 Perfect n lots of
lovvvvvv.....suprikeege

williamsalazar598 Beautiful

blanca__rae Thank you guys!!
@bebe_stores @etpaseo @dancingabc

Log in to like or comment



bianca__rae
KESQ Gulf California ...

Follow

79 likes

35w

bianca__rae Today's #LOTD dress: Le
Chateau Old Town La Quinta
See you back on News Channel 3 at Noon!

davidgonzaleztv


jsimon3

the_mystic_bat #wcnnewsedition

Log in to like or comment

see



 bianca__rae
KESO Gulf California ...

Follow

80 likes

34w

bianca__rae Here's to you, coffee. ☕
#nationalcoffeeday

Dress: Le Chateau Old Town La Quinta

mjkacz9 You're famous out there 📸

stephy8 🍷

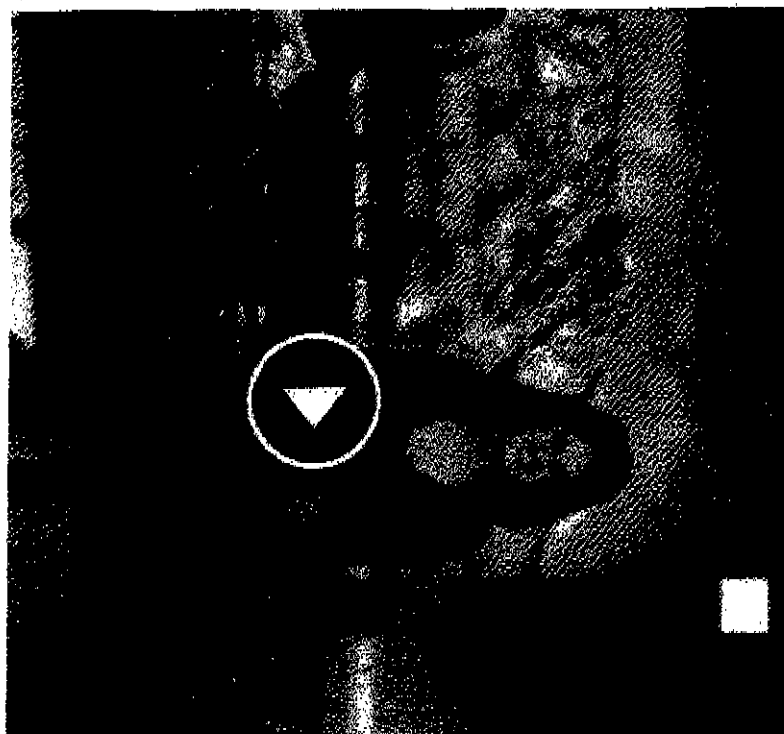
imjustawesonelikedat You look beautiful as
always

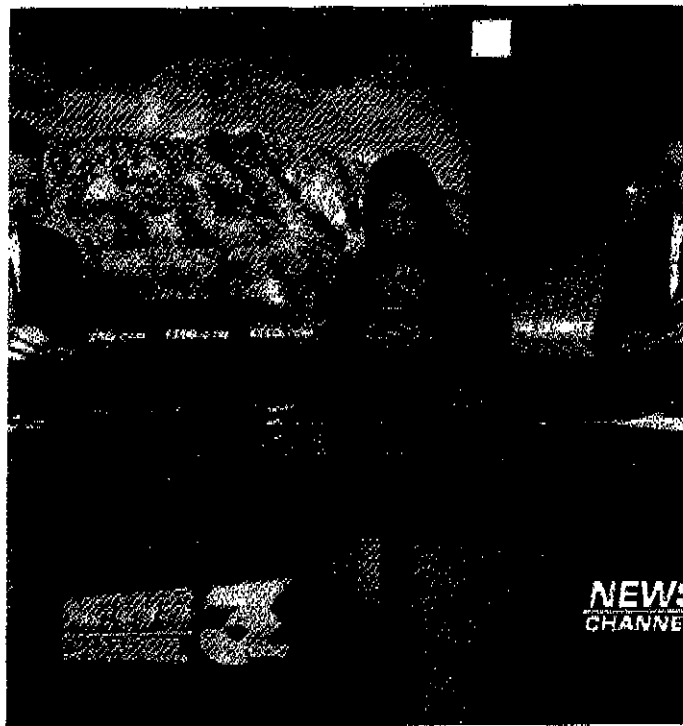
Log in to like or comment

...

Bianca Rae at **KESQ** Gulf California Broadcast
October 8, 2015 Thousand Palms, CA

about social media lend well to skits. We're here all day,
back at noon. @ Jeff Stahl Jerry Steffen
Le Chateau Boutique in Old Town La Quinta





bianca__rae
KESQ Gulf California

Follow

76 likes

32.0

bianca__rae The story was about teens being on social media all the time...but kids, we are ALL GUILTY. @@ @jenysteffen @thegiftah!

Dress: Le Chateau Old Town La Quinta
(tiffnysweetspot Amen)

stark_eez "Oh gosh, yeah."

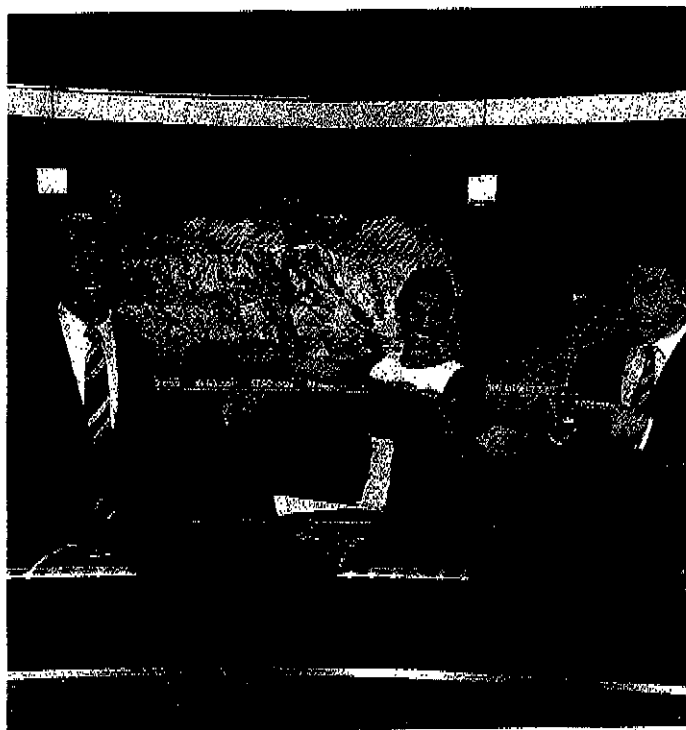
lexifremnessinthezoo @ that's how everyone at my college is. I'm not in my phone as much and I wonder why they are always glued and "can't live without it"

sjs3 Love this!

bgoutos You guys are great!!!! Love watching!!!!

Log in to like or comment

14.0



bianca__rae
KESQ Gulf California ...

Follow

83 likes

20w

bianca__rae Friday is in the building! 🍷
@tylerstahl @jerryteffen

Dress: Le Chateau Old Town La Quinta
dwayneclarkidng All the way from Napo
you make me smile @bianca__rae!
femme_lifestyle Terrific

Log in to like or comment

...



bianca__rae
KESQ Gulf California ..

Follow

101 likes

29m

bianca__rae Good morning!! I've already said the word Santa twice this newscast. Crazy. I've also said #electionday a lot but that is completely warranted. Tune in for all the info... :) @kesq

Dress: @hm

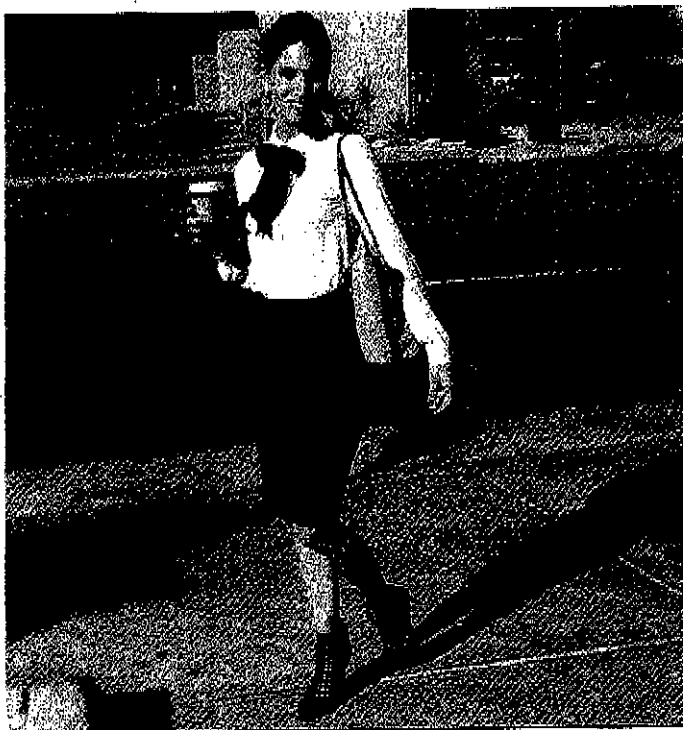
josie92260 My favorite news duo have an awesome day hugs 🤗

davidgonzaleztv 📺

_meredithkay Cute dress!!

Log in to like or comment.

0-0



bianca__rae

Follow

114 likes

28w

bianca__rae Morning anchor, foundation president, Jack's mom...so many hats all before 10:00 am! 🙄🙄🙄 Wouldn't have it any other way. See you on News Channel 3 at Noon.

Blouse: @hm
Skirt: @bcbg Power Skirt
Shoes: @aldo

trappednfashion Love your look!

bianca__rae @trappednfashion thank you!!

the_sile_ant That power skirt life tho0000

...gator... Beautiful

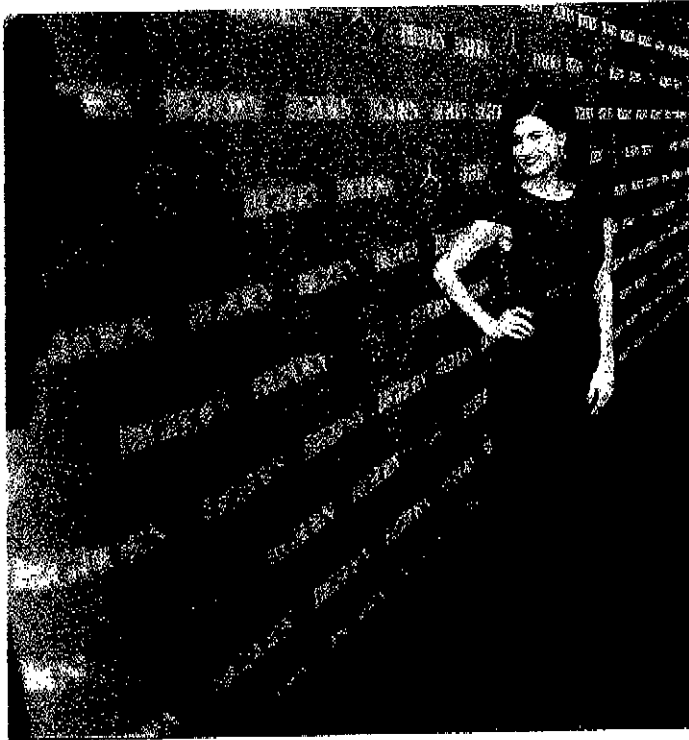
artistone Geeeeez Bianca! 🙄🙄🙄

franchescaa I love your shoes 🙄🙄🙄

x.that.girl.x_ Hi remember me I am Paige I was with there at the diabetes walk

Log in to like or comment.

...



bianca__rae

Follow

183 likes

20%

bianca__rae Palm Springs, you make all my dreams come true --> the 27th Annual Palm Springs International Film Festival Awards gala
Gown: @jovanifashions from Bohimi, Palm Desert
Jewelry: El Paseo Jewelers
Hair: @osivillo Jose Eber Rancho Mirage
Makeup: @nicolepolyerastylist Jose Eber RM
Toes: toena Vasile Jose Eber RM
Nails: Taena, Best City Nails Palm Desert

Thank you Jose Eber Salon Rancho Mirage in the Ritz-Carlton Rancho Mirage and @mtmasi23 for getting me ready!

daniellegersh You look beautiful BI I'm so excited to watch online! Love and miss you guys so much!

slernus96 can we take a picture together? Just like last year!

Log in to like or comment.

20%



Bianca Rae @Bianca_Rae · 3h

Tuesday AM fashion:

Denim suit: Grayse El Paseo

Earrings: The Jewelry Bar

Thank you both for styling me today!





bianca__rae

Follow

118 likes

bianca__rae Tuesday AM fashion: thank you @grayseelpaseo and @the.jewelry.bar for letting me wear this fab denim suit and these unique trendy earrings! #LOTD #fashion #newsanchor

elliepaws Those shoes

artiststone Geeeeez Ms Veronica

Corningstone ●●●●

skybfree +*+*+*

the_bridge_is_rebuilt ☹️

the.jewelry.bar You go girl

you are so appreciated @bianca__rae


dimitriphoto Love

vdog001 Dang you got nice boobs

Log in to like or comment.

...






the_alle_cat
Palm Springs Conven...

Follow

92 likes

the_alle_cat #tbt to last Saturday. Never felt more glamorous!  And there's so many to thank for that! If you need your hair, makeup, nails etc -- @joseeberm @mimasi23 @asivilio @oana.vasile @nicoleisaesthetics)

Log in to like or comment



the elle cat
CBS 2



COPIES

the_alle_cat Happy to help keep an 63 on
the 1* for you! #old #allecatstyle #EOD
Top: @friendconnection_official
Necklace: @bbbgmaxazna
Skirt: @victoriansecret : @sjs3

sljs3 Pure natural Love you
stylists salvador #TeamEOD


Ujsimon3 You are the very best!!! So LOVE watching you!

mensinkkijer Babbe!

blanca tee


eureka!indianwells Cheers!

507

 the_alle_cat
KESO Gulf California ...

Follow

84 likes

the_alle_cat When your @target water
bottle matches your @trinaturk 
Happy to be back at the desk this morning!

.....

#old #duckface #onrepeat #boomerang
#happy #trinaturk #weekend #orange
stylisalsalvador @the_alle_cat YAS!

trinaturk 

wearecoterie 

Log in to like or comment.

...



Alexandra Pierce @APierce · 9 Jul 2015

My story was about limes today so it seemed fitting to wear this lime dress!

Dress: [ALDO MAX VERBA](#)





Alexandra Pierce @APierce 6 Aug 2016

A green screen nightmare for today's

Dress  [View on Amazon](#)

1. 1. The following information was obtained from the records of the
2. Department of the Interior, Bureau of Land Management, regarding the
3. land ownership of the State of California:





 **the_alle_cat**
KESQ Gulf California ...

Follow

79 likes

100

the_alle_cat It's hot outside but my outfit is pretty cool! (Too cheesy?) Staying fashionable in this heat is hard... But @shopdolcevit @ijmaxx & @hgboutique make it easy! #laid #oetd #weekendreporter #matchymatchy #sweatyisthenewsexy?

sjs3 🍷

bianca__rae 🍷🍷🍷🍷

daniellegersh Love it 🍷🍷

bgoutas Sooooo cute!!! ♥

shopblackwater 🍷🍷🍷🍷🍷🍷

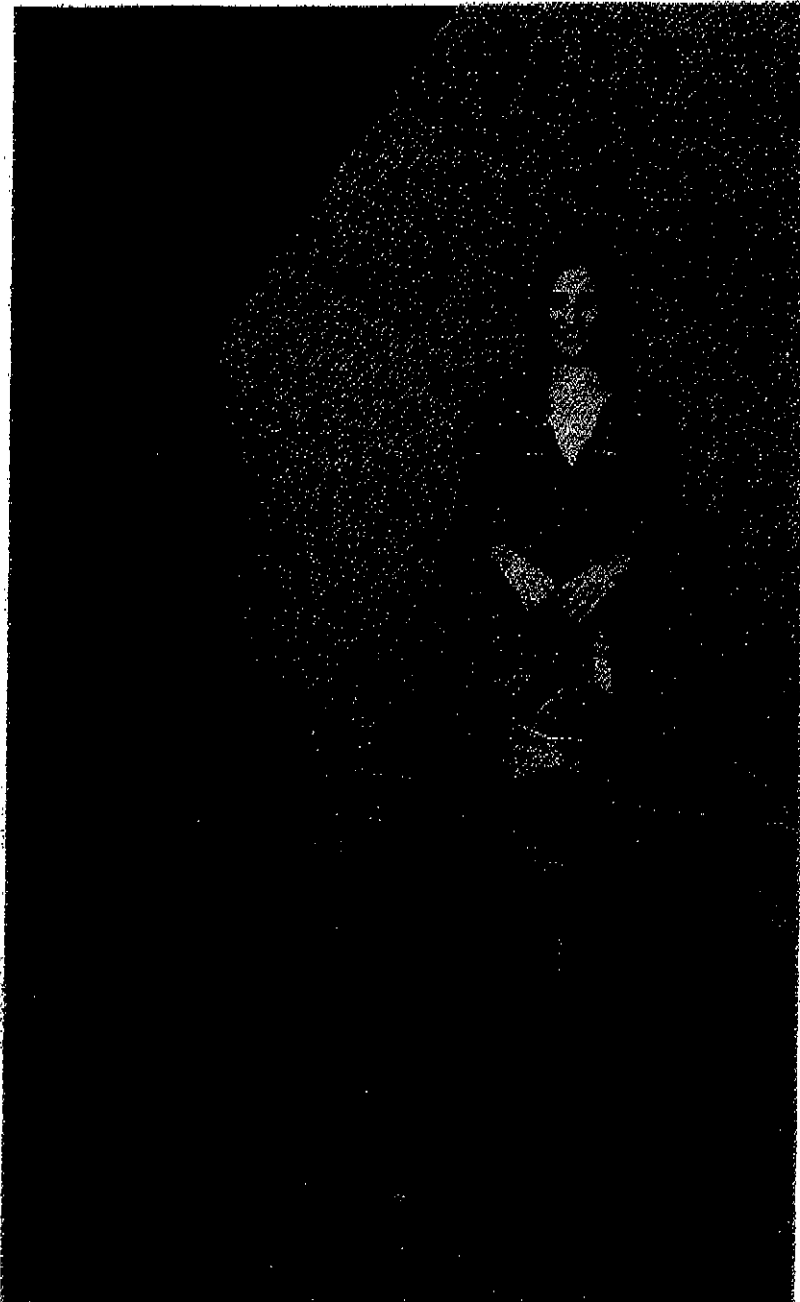
lizcreighton Love it!!

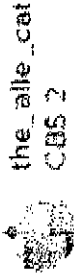
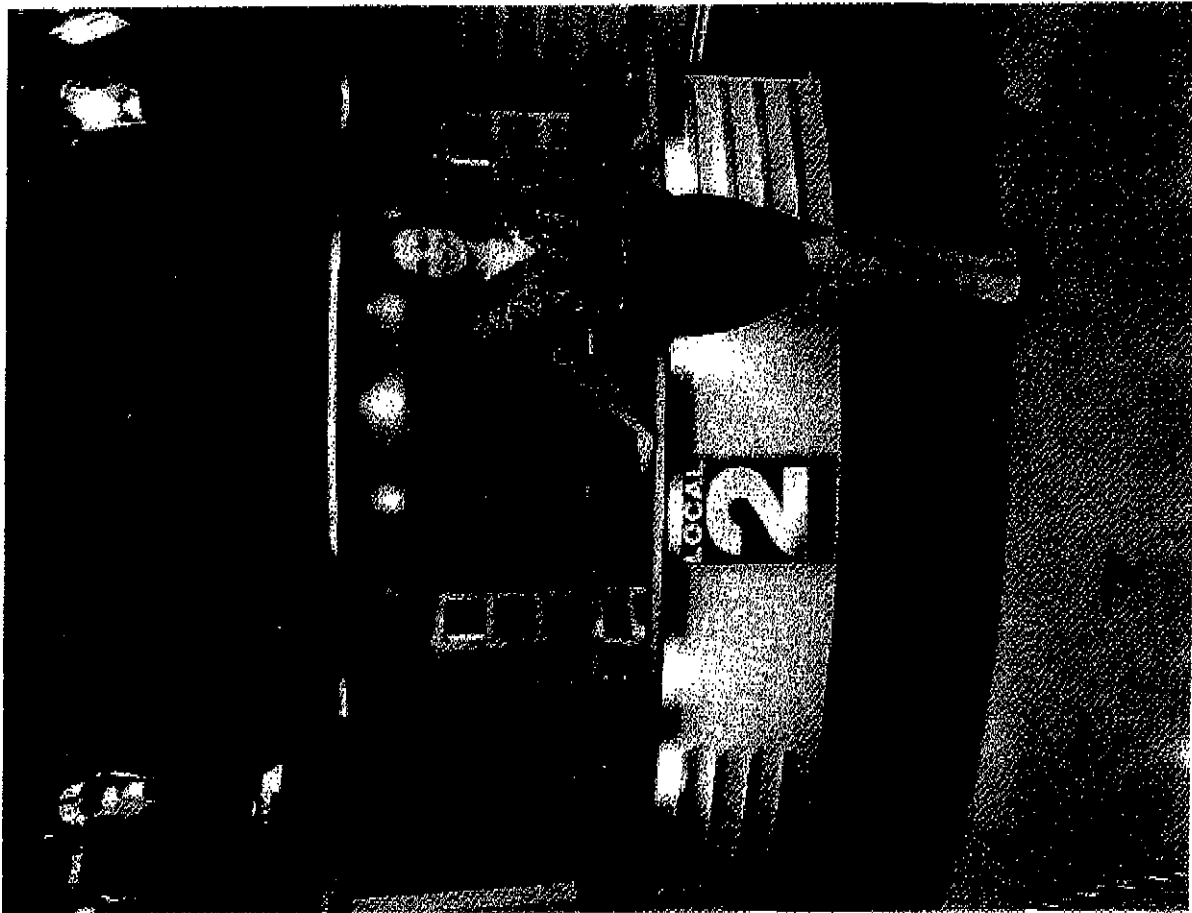
Log in to like or comment



Alexandra Pierce @APierce 25 Aug 2015

My from last weeks 'Eye on the Desert'. Dress:
shoes: . Thanks for watching





the_alle_cat
CBS 2

Follow

100 likes

the_alle_cat A little leopard peplum never
hurt nobody 🐆 This @bbcbignazria
power skirt and blouse are my go to outfit
when I'm feeling funky 🐆 #told
#EyeontheDesert #allecatstyle
#partylikeajournalist

sj53 Amazing in so many ways! 🐆

Log in to like this post.



the_alle_cat
CBS Local 2

Follow

91 likes

the_alle_cat Pop of PINK in my
favorite #etd!! @shopskara
@bcbgmaxazria @ffstores #allecatsyle

anglenbc6 Crite blazer!

miss__rae Love the pink

leezzus Hot mama!

marsh_art_ist SO your looklike

marshaney Pretty in PINK!!

davidgonzaleztv

Log in to like or comment.



the_alie_cat

Dancing with the Sta...

Follow

127 likes

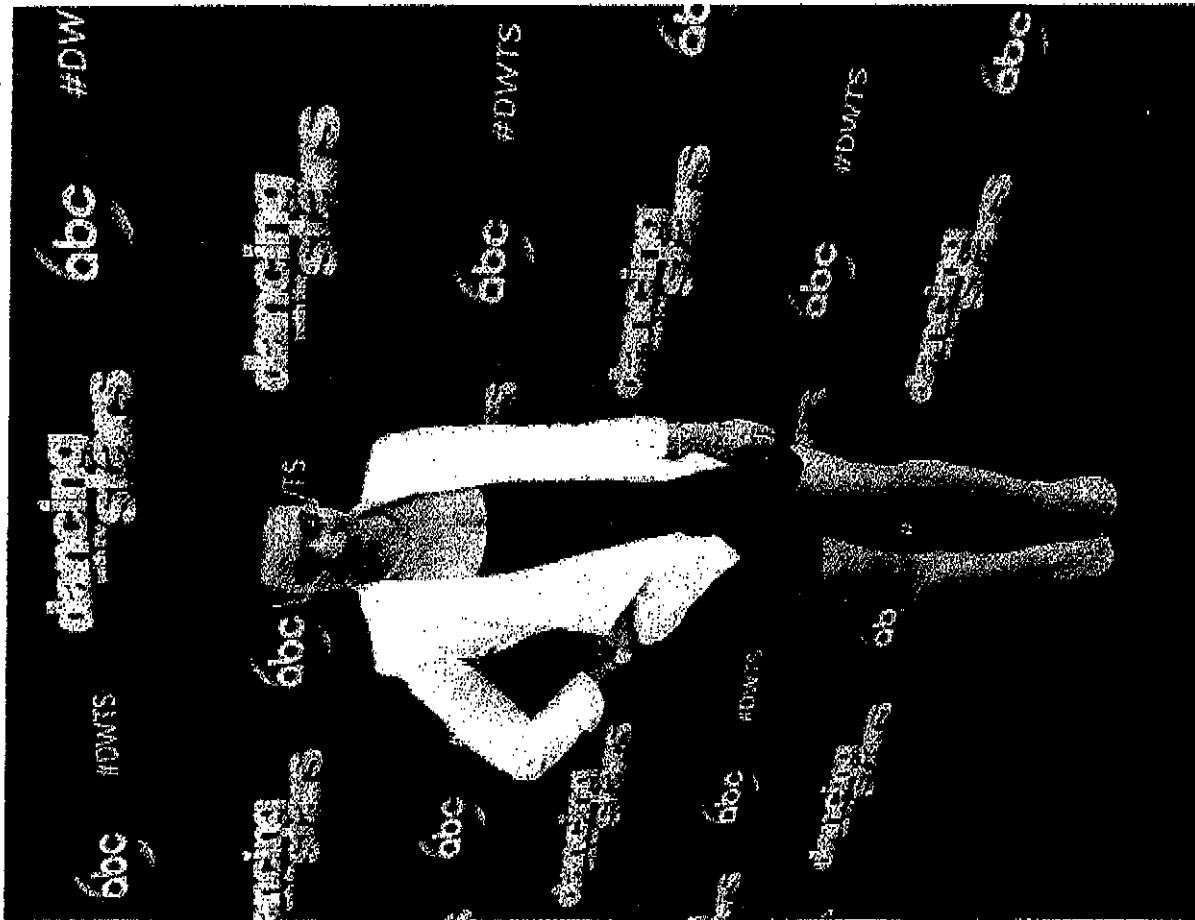
the_alie_cat Last night was a fairytale 🧚 but now I gotta make like Cinderella and get to cleaning my apartment. Thanks @bcbbgmaxazawa for making me look the part 🌟🌟🌟 #fotd #dwts Until next time #lateland 📺 #aliecattravels #aliecatsbye onetakestage OMG yes! Already gone?

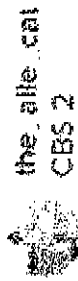
the_alie_cat Yes @onetakestage 📺 back to see you soon boo! Was right next to afterbuzz last night! Loved your people! Wished you were there next to me.

jsimon3 🌟🌟🌟 So pretty!!!

kimderinc 📺📺📺

Log in to like or comment





the_alle_cat
CBS 2

Follow

76 likes

the_alle_cat Hosting Eye on the Desert
is double fun when you're working with
your gal pal [@sjs3](#) +2

Twining on tonight's #EOD #told

Top and skirt: [@bcbgmazaria](#) Shoes:
[@stevemadden](#)

[@sjs3](#) blazer: [@theory](#) ... dress:

[@bcbgmazaria](#) shoes: [@stevemadden](#)
#greatmindstinklike

[sjs3](#) Love you!! [@sjs3](#)

[@stimon3](#) [@sjs3](#) a crazy great
team! +2 +2

[kehoefromreno](#) i'm graduating in May

Log in to like or comment.

the_alle_cat
KESQ Gulf California ...
Follow

83 likes

the_alle_cat I can't lift my arms above my head in this dress... So it becomes my anchoring dress. Tap pic for outfit details! #told #allecatstyle

jsimon3

davidgonzalezty

marsh_art_ist Love the dress

tarpsphotos

Log in to like or comment



the_alle_cat
Palm Springs Conven..

Follow

260 likes

the_alle_cat I think I've died and gone to heaven. Making my @psfilmfest Red Carpet Debut! Let's get this party started. But first so many people to thank for making me feel like — ✨ Dress: @clarissedesigns

Hair: @joseeberm @asivillo

Makeup: @moniesaisaesthetics

Nails: Tina at Best City Nails

Toes: @loana.vasile

Earrings: @bananarepublic

@bianca_uae

But most importantly thank you to KESQ & CBS Local Two for making all of my dreams come true! Now let's get the show on the road! Tune in at 5 on KESQ! If you're a Midwest homie you can stream live @ KESQ.com at 7! Wish me luck! #PSIFF16 #PSIFF

asivillo WOOOOWW!!! You look beyond amazing!!

Log in to like or comment

