



Adelman Broadcasting

Antelope Valley, CA

Ridgecrest, CA

Carlsbad, CA



April 25, 2019

EEO Staff
Policy Division - Media Bureau
Federal Communications Commission
445 12 Street, S. W.
Washington DC 20554

Re: EEO Audit Response for KGBB (FM), Ridgecrest, Ca 93555-3510 (Facility ID No. 457)

Dear Sir or Madam:

This letter is in response to the EEO audit letter dated February 14, 2019 which was received by Radio Station KGBB (FM), Ridgecrest, California (the "Station" or "KGBB").

Audit Data Requested (Paragraph 3 of the Audit Letter):

- a. Adelman Broadcasting, Incorporated hereinafter "Adelman Broadcasting" is the Licensee of the multiple broadcast stations serving the Ridgecrest, Lancaster/Palmdale and Central Coast markets. The combination of these stations comprise the one employment "unit" and this unit has over five full time employees. Attached hereto as Exhibit 1 are the 2016-2017 and 2017-2018 EEO Reports. These EEO Reports are available online at www.adelmanbroadcasting.com and in the Station's on-line Public Inspection at www.adelmanbroadcasting.com station specific "Public File" link .
- b. The EEO Reports provides the reader with information regarding the hiring of individuals for the Station and the "unit". During 2016-2017, one (1) individual was hired part time as a Administrative Assistant, one (1) individual was hired full time as a Salesperson for the Central Coast market; one (1) individual was hired part time as a Receptionist for the Ridgecrest/Inyokern market; two (2) individuals were hired as a Traffic Coordinator, one (1) individual was hired full time as a Program Director/Operations for the Lancaster/Palmdale market. These positions were posted on Craigslist, Indeed and Radio ads ran on KGBB-FM, KEPD-FM, KRAJ-FM, KTEA-FM, KCJZ-FM. We have provided one spot detail log per station and have maintained copies of all air times ran. During 2017-2018, one (1) individual was hired full time as Salesperson/Operations. This position was posted on Craigslist, Indeed and Radio ads ran on KGBB-FM, KEPD-FM, KRAJ-FM, KTEA-FM, KCJZ-FM. We have provided one spot detail log per station and have maintained copies of all air times ran attached Exhibit 2.
- c. During 2016-2017 Central Coast hired two (2) individuals, one (1) for part time Administrative, one (1) Salesperson full time, 22 applications received, 8 interviewed, 14 not qualified or over qualified.

Ridgecrest hired (1) individual part time Receptionist, 20 applications, 6 interviewed, 14 not qualified or over qualified. Lancaster/Palmdale hired three (3) individuals, one (1) for full time Traffic Coordinator 7/2016 and (1) full time Traffic Coordinator 7/2017, 118 total applications, 58 interviewed, 60 not qualified or over qualified. We ran in July 2016 and filled position but the position opened again in July, 2017 we posted the same job with the same sources and was filled again, one (1) individual was hired as a Program Director/Operations, 9 applications, 4 interviewed, 5 not qualified or over qualified.

During 2017-2018 Lancaster/Palmdale hired one (1) individual for full time Salesperson, 25 applicants, 15 interviewed, 10 were not qualified or over qualified.

- d. Adelman Broadcasting is very sensitive to the needs and opportunities in this community and has Participated in the following areas of outreach:
 - 1. Intern Program. Our intern program, which was started upon inception of group consists of college age students and adults that have an interest in radio. These individuals assist Adelman Broadcasting staff with their daily tasks. These interns have and continue to assist Adelman Broadcasting in programming, promotions, sales and general office duties. We have trained and hired individuals from our internship programs.
 - 2. Job Fairs/Expos. From 2016 thru 2018, Adelman Broadcasting has been a participant in the AV College Job Fair and various other job events. At each of these various events, Adelman Broadcasting personnel were on site to promote broadcasting careers. These job fairs have proven very effective as applicants are encouraged to fill out applications and referred to station websites for job openings Exhibit 3.
- e. There are no actions pending or resolved during the Station's current license period.
- f. Adelman Broadcasting standardized EEO policy is: (1) advertise over the air; (2) consider internal promotions; (3) post positions on our website; (4) look at the intern programs; (5) job postings for vacant positions on Craigslist, Indeed and All Access. Individuals interview through departments then all final decisions are made by Colleen Wardlaw, Vice President. On all of Adelman Broadcasting Postings and on air advertising, we make it clear that we are an Equal Opportunity Employer, Minorities and Women are encouraged to apply.
- g. Adelman Broadcasting always seeks to improve its EEO recruitment program and have continually worked community colleges, universities and local outreach programs to develop intern programs and job fairs in which it hopes that the students will stay in the communications field (and to be possibly hired by Adelman Broadcasting in the future in non-intern positions). Adelman Broadcasting also holds quarterly meetings with management. The management and staff discuss EEO policies on what discrimination is, and mechanisms and procedures to report any incidents of discrimination.
- h. Adelman Broadcasting is an equal opportunity employer. Our management has sought to keep up with employment rules and regulations and as stated above one way it has done so is to be a member of the National Association of Broadcasters. This organization has been helpful with all aspects of broadcast operations, including employment law. Adelman Broadcasting does not have any union agreements.
- i. Not applicable

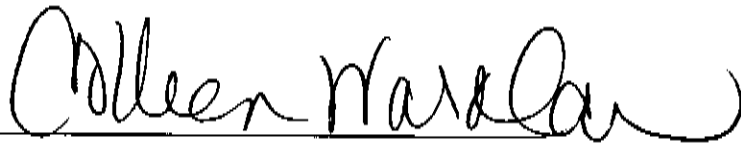
- j. **EEO Opportunity-Employee Handbook:** In order to provide equal employment and advancement opportunities for all individuals, employment decisions at Adelman Broadcasting, Inc will be based on merit, qualifications and abilities. Employment practices will not be influenced or affected by an applicant's or employee's race, color, religion, gender, national origin, age, medical condition, physical or mental disability, political affiliation, veteran status, or any other characteristic protected by federal, state or local law.

It is Adelman Broadcasting, Inc's intent to comply with the provisions of state and federal disability anti-discrimination requirements, and make reasonable accommodations for qualified individuals with known disabilities as required by these regulations. In some cases, the provisions of the California Fair Employment and Housing Act (FEHA) and/or Americans with Disabilities Act (ADA) pertaining to accommodation of disabilities may apply. It is the policy of Adelman Broadcasting, Inc. not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability. Consistent with this policy of accommodations to a qualified individual with a disability, as defined by FEHA and/or the ADA, who has made Adelman Broadcasting, Inc. aware of his or her disability, provided that such accommodation does not constitute an undue hardship on Adelman Broadcasting, Inc. Therefore, if you feel you need reasonable accommodation to perform the essential functions of your job, contact our Supervisor or the President.

The policy governs all aspects of employment including selection, job assignment, compensation, discipline, termination and access to benefits and training.

If you have questions or concerns about any type of discrimination in the workplace, you are encouraged to bring these issues to the attention of your Supervisor, or the President of Adelman Broadcasting, Inc. You can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of Employment.

Sincerely,

A handwritten signature in black ink that reads "Colleen Wardlaw". The signature is fluid and cursive, with the first name "Colleen" being more prominent than the last name "Wardlaw".

Colleen Wardlaw, Vice President

Email: cwardlaw@adelmanbroadcasting.com

colleenwardlaw@gmail.com

Phone: 661-718-1552



KGBB(FM) EDWARDS, CA 457
ADELMAN BROADCASTING, INC.
731 N. BALSAM STREET
RIDGECREST, CA 93555-3510

Federal Communications Commission
Washington, D.C. 20554

February 14, 2019

Dear Licensee:

1. In accordance with 47 CFR § 73.2080(f)(4), the station employment unit (the Unit) that includes your above-referenced station (the Station) has been randomly selected for an audit of its Equal Employment Opportunity (EEO) program. A copy of Section 73.2080 of the Commission's rules is attached at the end of this letter for your reference.
2. If the Unit is not required under our rules to have an EEO recruitment program due to the nature of its full-time workforce (having fewer than five full-time employees, defined as employees regularly assigned to work 30 hours a week or more), you must still respond to this audit letter. However, in your response, you are required to provide only a list of the Unit's full-time employees, identified only by job title (no names should be provided), the number of hours each is regularly assigned to work per week, and a response to Question 3(e) below. Also, in formulating your response, please see Questions 4(a)-(d) below regarding brokers and brokered stations for instructions for situations in which the applicable employment unit has fewer than five full-time employees.
3. **Audit Data Requested.** If the Unit employs five or more full-time employees (and all units, for Question 3(e)), provide the following information, including an explanation regarding any requested information that you are unable to provide:
 - (a) Copies of the Unit's two most recent EEO public file reports, described in Section 73.2080(c)(6). For any stations in the Unit that have websites, provide each web address. If the Unit's most recent EEO public file report is not posted on each of these websites, indicate each relevant website and provide an explanation of why the report is not posted, as required by Section 73.2080(c)(6). In accordance with Section 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report provided. If the Unit does not have its own website, but its corporate site contains a link to a site pertaining to the Unit, then the Unit's most recent EEO public file report must be linked to either the Unit's site or the general corporate site, pursuant to Section 73.2080(c)(6).
 - (b) For each Unit full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in Section 73.2080(c)(5)(iii). However, to reduce your burden of responding to this audit, if you have sent a job notice to multiple sources, you may send us only one copy of each such notice, along with a list of the sources to which you have sent the notice. In addition, indicate in your response whether you retain copies of all notices sent to all sources used, as required by Section 73.2080(c)(5)(iii). For on-air ads that aired multiple times, you may send us one log sheet indicating when the ad aired and tell us the other times it aired instead of

providing multiple log sheets. Also, tell us whether you have retained all the log sheets for each time the ad aired. We may ask for them for verification, but you need not provide them at this time. Include, however, copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of Unit job openings, as described in Section 73.2080(c)(1)(ii).

(c) In accordance with Section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.

(d) Documentation of Unit recruitment initiatives described in Section 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, and training for staff. Specify the Unit personnel involved in each such recruitment initiative. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which any station included in the Unit operates is 250,000 or more. Based upon these two factors, determine and state whether the Unit is required to perform two or four initiatives within a two-year period, pursuant to Sections 73.2080(c)(2) and (e)(3). If you have performed more than four initiatives, you may provide documentation for only four and summarize the rest instead of providing documentation for all of them. If we believe any of the initiatives you have documented are inadequate, we may ask for more information, but documentation for four is all we need at this time.

(e) Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before anybody having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex. For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the names of the complainant and other persons involved; (3) the date the complaint was filed; (4) the court or agency before which it is pending or by which it was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that all complaints must be reported, regardless of their status or disposition.

(f) In accordance with Section 73.2080(b), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

(g) In accordance with Section 73.2080(c)(3), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis.

(h) In accordance with Section 73.2080(c)(4), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Unit's efforts to analyze periodically its measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect. If the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

(i) If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in Section 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be provided. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under Section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.

(j) Among items we do not need in your response to this letter are copies of applicants' resumes, your company training manuals, posters, employee handbooks, or corporate guidebooks. If you believe any of the information in various corporate manuals or posters are relevant to any part of this audit letter, you may summarize what is in them. If you believe this letter requires you to provide an unusually burdensome volume of documentation, you may contact us prior to the response deadline to discuss possible ways of condensing your response.

4. Time Brokerage.

(a) **Licensee of brokered station(s).** If the Unit employs fewer than five full-time employees and any station included in it is subject to a time brokerage agreement, in addition to responding to this letter and providing us a list of the Unit's full-time employees listed by job title (and the number of hours each employee is assigned to work) and a response to Question 3(e) above, you must immediately forward a copy of this letter to the broker under each such agreement, which must respond to Question 4(b) below. If the Unit employs five or more full-time employees, the licensee must respond fully to paragraph 3 above, and also forward the letter to the broker so the broker may respond to Question 4(b) below.

(b) **Broker receiving audit letter from brokered station licensee.** If you are the broker of a station, and the station you are brokering receives an audit letter, the licensee of the brokered station must forward the audit letter to you. You should respond to the audit letter concerning EEO information relating only to your own full-time employees at the brokered station. *See* Section 73.2080(f)(3).

(c) **Broker receiving audit letter directly from Commission.** If you are a broker, but the target station in this audit letter is a station licensed to you, you must submit information requested herein for the EEO program at your station (or employment unit). If you maintain EEO data for a station you are brokering with that for your own station that is the target of this audit letter, and lack the ability to separate the information, you must include in your response the information requested herein pertaining to **your** full-time employees at the station(s) you broker. *See* Section 73.2080(f)(3).

(d) **Broker described under 4(b) or 4(c) above.** If your full-time employees at the station you are brokering, combined with your full-time employees at your owned station(s), total fewer than five, however, you need only respond to this letter by the deadline described below by submitting a list of your Unit's full-time employees (listed by job title and number of hours regularly assigned to work per week) and the same type of list for the full-time employees you employ at the brokered station(s), and a response to Question 3(e) above.

5. Procedures. You must upload your response to this audit letter to your station's online public inspection file by April 1, 2019, and include in your response your station's Facility ID Number and an e-mail address where a station representative can be contacted about your response. You should not direct your response to the office of the FCC Secretary. The Secretary does not process responses to EEO audit letters. The accuracy and completeness of the response must be certified by an officer, partner or other principal of the Station licensee or broker (as appropriate) or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee. (See 47 CFR § 1.16.)

6. To knowingly and willfully make any false statement or conceal any material fact in response to this audit is punishable by fine or imprisonment (*see* 18 U.S.C. § 1001; 47 C.F.R. § 1.17), revocation of any station license or construction permit (47 U.S.C. § 312(a)(1)), and/or forfeiture (47 U.S.C. § 503). Extensions of time must be requested by e-mail to lewis.pulley@fcc.gov and will be granted only upon a showing of extraordinary circumstances. Unless and until the EEO Staff grants such a request the original deadline remains in effect. Failure to respond to this audit letter by the deadline is punishable by sanctions in accordance with Section 73.2080(g).


7. In accordance with Sections 73.3526(e)(10) (for commercial stations) and 73.3527(e)(11) (for noncommercial educational stations), available through these links:

https://www.ecfr.gov/cgi-bin/text-idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73_13526&rgn=div8

https://www.ecfr.gov/cgi-bin/text-idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73_13527&rgn=div8

you must place a copy of this letter and your response in the public inspection file, including the online public file, of each affected station. Consequently, your response should not include personal information about individuals, such as social security numbers, home addresses, or other personally identifiable information. We do not require that employment units retain such information in their records, or that such information be provided in response to this letter.

8. If our EEO random audits sent in 2017 or 2018 included the Station, you may not have to respond to this letter. If the Station completed an audit in that timeframe, before responding, please tell us the dates of public file reports included in the Station's recent audit response, via e-mail to lewis.pulley@fcc.gov. We will then advise you if a response is necessary. Also, if your most recent license renewal application was granted after February 1, 2017, you may not need to respond to this letter. To find out if you are exempt from responding, send an e-mail to lewis.pulley@fcc.gov. Should you have any questions, please contact the EEO Staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,

Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau

Enclosure

connection with such vacancies; and

(v) A list and brief description of initiatives undertaken pursuant to paragraph (c)(2) of this section during the preceding year.

(d) **Small Station Exemption.** The provisions of paragraphs (b) and (c) of this section shall not apply to station employment units that have fewer than five full-time employees.

(e) **Definitions.** For the purposes of this rule:

(1) A full-time employee is a permanent employee whose regular work schedule is 30 hours per week or more.

(2) A station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

(3) A smaller market includes metropolitan areas as defined by the Office of Management and Budget with a population of fewer than 250,000 persons and areas outside of all metropolitan areas as defined by the Office of Management and Budget.

(f) **Enforcement.** The following provisions apply to employment activity concerning full-time positions at each broadcast station-employment unit (defined in this part) employing five or more persons in full-time positions, except where noted.

(1) All broadcast stations, including those that are part of an employment unit with fewer than five full-time employees, shall file a Broadcast Equal Employment Opportunity Program Report (Form 396) with their renewal application. Form 396 is filed on the date the station is due to file its application for renewal of license. If a broadcast licensee acquires a station pursuant to FCC Form 314 or FCC Form 315 during the period that is to form the basis for the Form 396, information provided on its Form 396 should cover the licensee's EEO recruitment activity during the period starting with the date it acquired the station. Stations are required to maintain a copy of their Form 396 in the station's public file in accordance with the provisions of §§ 73.3526 and 73.3527.

(2) The Commission will conduct a mid-term review of the employment practices of each broadcast television station and each radio station

that is part of an employment unit of more than ten full-time employees four years following the station's most recent license expiration date as specified in § 73.1020. Each such licensee is required to file with the Commission the Broadcast Mid-Term Report (FCC Form 397) four months prior to that date. If a broadcast licensee acquires a station pursuant to FCC Form 314 or FCC Form 315 during the period that is to form the basis for the Form 397, its Report should cover the licensee's EEO recruitment activity during the period starting with the date it acquired the station.

(3) If a station is subject to a time brokerage agreement, the licensee shall file Forms 396, Forms 397, and EEO public file reports concerning only its own recruitment activity. If a licensee is a broker of another station or stations, the licensee-broker shall include its recruitment activity for the brokered station(s) in determining the bases of Forms 396, Forms 397 and the EEO public file reports for its own station. If a licensee-broker owns more than one station, it shall include its recruitment activity for the brokered station in the Forms 396, Forms 397, and EEO public file reports filed for its own station that is most closely affiliated with, and in the same market as, the brokered station. If a licensee-broker does not own a station in the same market as the brokered station, then it shall include its recruitment activity for the brokered station in the Forms 396, Forms 397, and EEO public file reports filed for its own station that is geographically closest to the brokered station.

(4) Broadcast stations subject to this section shall maintain records of their recruitment activity necessary to demonstrate that they are in compliance with the EEO rule. Stations shall ensure that they maintain records sufficient to verify the accuracy of information provided in Forms 396, Forms 397, and EEO public file reports. To determine compliance with the EEO rule, the Commission may conduct inquiries of licensees at random or if it has evidence of a possible violation of the EEO rule. In addition, the Commission will conduct random audits. Specifically, each year approximately five percent of all licensees in the television and radio services will be randomly selected for audit, ensuring that, even though the number of radio licensees is significantly larger than television licensees, both services are represented in the audit process. Upon request, stations shall make records available to the Commission for its review.

connection with such vacancies; and

(v) A list and brief description of initiatives undertaken pursuant to paragraph (c)(2) of this section during the preceding year.

(d) Small Station Exemption. The provisions of paragraphs (b) and (c) of this section shall not apply to station employment units that have fewer than five full-time employees.

(e) Definitions. For the purposes of this rule:

(1) A full-time employee is a permanent employee whose regular work schedule is 30 hours per week or more.

(2) A station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

(3) A smaller market includes metropolitan areas as defined by the Office of Management and Budget with a population of fewer than 250,000 persons and areas outside of all metropolitan areas as defined by the Office of Management and Budget.

(f) Enforcement. The following provisions apply to employment activity concerning full-time positions at each broadcast station employment unit (defined in this part) employing five or more persons in full-time positions, except where noted.

(1) All broadcast stations, including those that are part of an employment unit with fewer than five full-time employees, shall file a Broadcast Equal Employment Opportunity Program Report (Form 396) with their renewal application. Form 396 is filed on the date the station is due to file its application for renewal of license. If a broadcast licensee acquires a station pursuant to FCC Form 314 or FCC Form 315 during the period that is to form the basis for the Form 396, information provided on its Form 396 should cover the licensee's EEO recruitment activity during the period starting with the date it acquired the station. Stations are required to maintain a copy of their Form 396 in the station's public file in accordance with the provisions of §§ 73.3526 and 73.3527.

(2) The Commission will conduct a mid-term review of the employment practices of each broadcast television station and each radio station

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reasonable, good faith judgment to widely disseminate information concerning the vacancy.

(ii) In addition to such recruitment sources, a station employment unit shall provide notification of each full-time vacancy to any organization that distributes information about employment opportunities to job seekers or refers job seekers to employers; upon request by such organization. To be entitled to notice of vacancies, the requesting organization must provide the station employment unit with its name, mailing address, e-mail address (if applicable), telephone number, and contact person, and identify the category or categories of vacancies of which it requests notice. (An organization may request notice of all vacancies).

(2) Engage in at least four (if the station employment unit has more than ten full-time employees and is not located in a smaller market) or two (if it has five to ten full-time employees and/or is located entirely in a smaller market) of the following initiatives during each two-year period beginning with the date stations in the station employment unit are required to file renewal applications, or the second, fourth or sixth anniversaries of that date.

(i) Participation in at least four job fairs by station personnel who have substantial responsibility in the making of hiring decisions;

(ii) Hosting of at least one job fair;

(iii) Co-sponsoring at least one job fair with organizations in the business and professional community whose membership includes substantial participation of women and minorities;

(iv) Participation in at least four events sponsored by organizations representing groups present in the community interested in broadcast employment issues, including conventions, career days, workshops, and similar activities;

(v) Establishment of an internship program designed to assist members of the community to acquire skills needed for broadcast employment;

(vi) Participation in job banks, Internet programs, and other programs designed to promote outreach generally (i.e., that are not primarily directed to providing notification of specific job vacancies);

(vii) Participation in scholarship programs designed to assist students interested in pursuing a career in broadcasting;

(viii) Establishment of training programs designed to enable station personnel to acquire skills that could qualify them for higher level positions;

(ix) Establishment of a mentoring program for station personnel;

(x) Participation in at least four events or programs sponsored by educational institutions relating to career opportunities in broadcasting;

(xi) Sponsorship of at least two events in the community designed to inform and educate members of the public as to employment opportunities in broadcasting;

(xii) Listing of each upper-level category opening in a job bank or newsletter of media trade groups whose membership includes substantial participation of women and minorities;

(xiii) Provision of assistance to unaffiliated non-profit entities in the maintenance of web sites that provide counseling on the process of searching for broadcast employment and/or other career development assistance pertinent to broadcasting;

(xiv) Provision of training to management level personnel as to methods of ensuring equal employment opportunity and preventing discrimination;

(xv) Provision of training to personnel of unaffiliated non-profit organizations interested in broadcast employment opportunities that would enable them to better refer job candidates for broadcast positions;

(xvi) Participation in other activities designed by the station employment unit reasonably calculated to further the goal of disseminating information as to employment opportunities in broadcasting to job candidates who might otherwise be unaware of such opportunities.

(3) Analyze its recruitment program on an ongoing basis to ensure that it is effective in achieving broad outreach to potential applicants, and address any problems found as a result of its analysis.

reasonable, good faith judgment to widely disseminate information concerning the vacancy.

(ii) In addition to such recruitment sources, a station employment unit shall provide notification of each full-time vacancy to any organization that distributes information about employment opportunities to job seekers or refers job seekers to employers; upon request by such organization. To be entitled to notice of vacancies, the requesting organization must provide the station employment unit with its name, mailing address, e-mail address (if applicable), telephone number, and contact person, and identify the category or categories of vacancies of which it requests notice. (An organization may request notice of all vacancies).

(2) Engage in at least four (if the station employment unit has more than ten full-time employees and is not located in a smaller market) or two (if it has five to ten full-time employees and/or is located entirely in a smaller market) of the following initiatives during each two-year period beginning with the date stations in the station employment unit are required to file renewal applications, or the second, fourth or sixth anniversaries of that date.

(i) Participation in at least four job fairs by station personnel who have substantial responsibility in the making of hiring decisions;

(ii) Hosting of at least one job fair;

(iii) Co-sponsoring at least one job fair with organizations in the business and professional community whose membership includes substantial participation of women and minorities;

(iv) Participation in at least four events sponsored by organizations representing groups present in the community interested in broadcast employment issues, including conventions, career days, workshops, and similar activities;

(v) Establishment of an internship program designed to assist members of the community to acquire skills needed for broadcast employment;

(vi) Participation in job banks, Internet programs, and other programs designed to promote outreach generally (i.e., that are not primarily directed to providing notification of specific job vacancies);

(vii) Participation in scholarship programs designed to assist students interested in pursuing a career in broadcasting;

(viii) Establishment of training programs designed to enable station personnel to acquire skills that could qualify them for higher level positions;

(ix) Establishment of a mentoring program for station personnel;

(x) Participation in at least four events or programs sponsored by educational institutions relating to career opportunities in broadcasting;

(xi) Sponsorship of at least two events in the community designed to inform and educate members of the public as to employment opportunities in broadcasting;

(xii) Listing of each upper-level category opening in a job bank or newsletter of media trade groups whose membership includes substantial participation of women and minorities;

(xiii) Provision of assistance to unaffiliated non-profit entities in the maintenance of web sites that provide counseling on the process of searching for broadcast employment and/or other career development assistance pertinent to broadcasting;

(xiv) Provision of training to management level personnel as to methods of ensuring equal employment opportunity and preventing discrimination;

(xv) Provision of training to personnel of unaffiliated non-profit organizations interested in broadcast employment opportunities that would enable them to better refer job candidates for broadcast positions;

(xvi) Participation in other activities designed by the station employment unit reasonably calculated to further the goal of disseminating information as to employment opportunities in broadcasting to job candidates who might otherwise be unaware of such opportunities.

(3) Analyze its recruitment program on an ongoing basis to ensure that it is effective in achieving broad outreach to potential applicants, and address any problems found as a result of its analysis.

(5) The public may file complaints throughout the license term based on a station's Form 397 or the contents of a station's public file. Provisions concerning filing, withdrawing, or non-filing of informal objections or petitions to deny license renewal, assignment, or transfer applications are delineated in §§ 73.3584 and 73.3587-3589 of the Commission's rules.

(g) Sanctions and Remedies. The Commission may issue appropriate sanctions and remedies for any violation of this rule.

47 C.F.R. § 73.3526

CODE OF FEDERAL REGULATIONS
TITLE 47--TELECOMMUNICATION
CHAPTER I--FEDERAL
COMMUNICATIONS COMMISSION
SUBCHAPTER C--BROADCAST RADIO
SERVICES
PART 73--RADIO BROADCAST
SERVICES
SUBPART H--RULES APPLICABLE TO
ALL BROADCAST STATIONS

§ 73.3526 Local public inspection file of commercial stations.

(e)(10) Material relating to FCC investigation or complaint. Material having a substantial bearing on a matter which is the subject of an FCC investigation or complaint to the FCC of which the applicant, permittee, or licensee has been advised. This material shall be retained until the applicant, permittee, or licensee is notified in writing that the material may be discarded.

47 C.F.R. § 73.3527

CODE OF FEDERAL REGULATIONS
TITLE 47--TELECOMMUNICATION
CHAPTER I--FEDERAL
COMMUNICATIONS COMMISSION
SUBCHAPTER C--BROADCAST RADIO
SERVICES
PART 73--RADIO BROADCAST
SERVICES
SUBPART H--RULES APPLICABLE TO
ALL BROADCAST STATIONS

§ 73.3527 Local public inspection file of noncommercial educational stations

(e)(11) Material relating to FCC investigation or complaint. Material having a substantial bearing on a matter which is the subject of an FCC investigation or complaint to the FCC of which the applicant, permittee, or licensee has been advised. This material shall be retained until the applicant, permittee, or licensee is notified in writing that the material may be discarded.

EXHIBIT 1

Adelman Broadcasting

Position Filled 8/31/2016-8/31/2017

CENTRAL COAST

(Hired 2 people 3.15.17 and 3.7.17 - Source: Radio Ad, Craigslist Ad & Facebook)

Position filled:

Job Description: Part Time Administrative

(Hired 3.15.2017 Source: Radio Ad, Craigslist Ad & Facebook)

Office Duties.

Opening listed during the time listed above. We received 15 applicants. We interviewed 5 people, 10 were not qualified or overqualified.

Job Description: Full time Sales

(Hired 3.7.17 Source: Radio Ad, Craigslist Ad & Facebook)

Sell advertising from list provided and prospecting. Maintain existing accounts, and develop new accounts by meeting with client and keeping commercial copy current along with marketing strategies. Communicate regularly with Sales Manager

Opening list during the time period listed above, received 7 applicants. We interviewed 3 people, 4 were not qualified or overqualified.

RIDGECREST

(Hired 1 person hired 2.6.17 - Source: Radio Ad, Craigslist Ad & Facebook)

Position filled:

Job Description: Part Time Receptionist

(Hired 2/6/17 Source: Radio Ad, Craigslist Ad & Facebook)

Office Duties. And other duties as assigned.

Opening listed during the time listed above. We received 20 applicants. We interviewed 6 people, 14 were not qualified or overqualified.

EXHIBIT I

Lancaster/Palmdale

(Hired 3 people 7/2016, 2/2017, 7/2017 - Source: Radio Ad, Craigslist Ad & Facebook)

Position filled:

Job Description: Traffic Coordinator

(Hired 7/2016 Source: Radio Ad, Craigslist Ad & Facebook)

Assist with order entry and logs.

Opening listed during the time listed above. We received 53 applicants. We interviewed 27 people, 26 were not qualified or overqualified.

Job Description: Program Director

(Hired 2.17 Source: Radio Ad, Craigslist Ad & Facebook)

Produce Commercials, programming 103.9 bob fm.

Opening listed during the time period listed above, received 9 applicants. We interviewed 4 people, 5 were not qualified or overqualified.

Job Description: Traffic Coordinator

(Hired 7.17 Source: Radio Ad, Craigslist Ad & Facebook)

Assist with order entry and logs.

Opening listed during the time period listed above, received 65 applicants. We interviewed 31 people, 34 were not qualified or overqualified.

In addition to posting on job websites, on air advertising Adelman Broadcasting, Inc. "unit" during this period has the following ongoing outreach:

1. Intern program
2. Job Fairs

See Public File Reports online

EXHIBIT 1

Adelman Broadcasting
Positions filled 8/31/2017-8/31/2018

Lancaster/Palmdale

Marketing Consultant
(Hired 1 8.2018, Source: Radio Ad, Craigslist & Indeed Ad)

Sell advertising from list provided and prospecting. Maintain existing accounts, and develop new accounts by meeting with client and keeping commercial copy current along with marketing strategies. Communicate regularly with Sales Manager.

Opening listed on our websites (www.adelmanbroadcasting.com), ran radio advertising schedule for marketing consultant, ran ads on craigslist and indeed during time listed above. We received 25 applicants. We interviewed 15 people, 10 were not qualified or over qualified.

In addition to posting on job websites, on air advertising Adelman Broadcasting, Inc. "unit" during this period has the following ongoing outreach:

1. Intern program
2. Job Fairs

See Public File Reports online

ADELMAN BROADCASTING, INC.
Spot Detail - ADELMAN BROADCASTING - 11078

EXHIBIT 2

| Contract # | Log Date | Copy Name | S Log Time | Spot Status |
|------------|-----------|----------------------|------------|-------------|
| 11078 | 8/29/2018 | MARKETING CONSULTANT | 19:22:30 | Invoiced |
| 11078 | 8/29/2018 | MARKETING CONSULTANT | 10:22:00 | Invoiced |
| 11078 | 8/29/2018 | MARKETING CONSULTANT | 05:21:00 | Invoiced |
| 11078 | 8/29/2018 | MARKETING CONSULTANT | 21:21:00 | Invoiced |
| 11078 | 8/29/2018 | MARKETING CONSULTANT | 06:53:30 | Invoiced |
| 11078 | 8/30/2018 | MARKETING CONSULTANT | 10:37:00 | Invoiced |
| 11078 | 8/30/2018 | MARKETING CONSULTANT | 09:51:00 | Invoiced |
| 11078 | 8/30/2018 | MARKETING CONSULTANT | 06:53:00 | Invoiced |
| 11078 | 8/30/2018 | MARKETING CONSULTANT | 13:52:00 | Invoiced |
| 11078 | 8/30/2018 | MARKETING CONSULTANT | 11:52:00 | Invoiced |
| 11078 | 8/30/2018 | MARKETING CONSULTANT | 05:21:30 | Invoiced |
| 11078 | 8/30/2018 | MARKETING CONSULTANT | 16:37:30 | Invoiced |
| 11078 | 8/30/2018 | MARKETING CONSULTANT | 21:52:00 | Invoiced |
| 11078 | 8/30/2018 | MARKETING CONSULTANT | 18:53:00 | Invoiced |
| 11078 | 8/31/2018 | MARKETING CONSULTANT | 18:37:00 | Invoiced |
| 11078 | 8/31/2018 | MARKETING CONSULTANT | 21:23:00 | Invoiced |
| 11078 | 8/31/2018 | MARKETING CONSULTANT | 13:37:30 | Invoiced |
| 11078 | 8/31/2018 | MARKETING CONSULTANT | 12:51:00 | Invoiced |
| 11078 | 8/31/2018 | MARKETING CONSULTANT | 15:22:30 | Invoiced |
| 11078 | 8/31/2018 | MARKETING CONSULTANT | 20:21:00 | Invoiced |
| 11078 | 8/31/2018 | MARKETING CONSULTANT | 11:52:00 | Invoiced |
| 11078 | 8/31/2018 | MARKETING CONSULTANT | 17:23:00 | Invoiced |
| 11078 | 8/31/2018 | MARKETING CONSULTANT | 06:22:00 | Invoiced |

Station: KEPD-FM (161)

Inv Status: (1)

OAR: Unchecked (1)

Rate: 0.00 (1)

11078

Trash

Inv Status: Posted (160)

OAR: Unchecked (160)

Rate: 0.00 (160)

| | | | | |
|-------|----------|---------------------------|----------|----------|
| 11078 | 8/9/2018 | KEPD-MARKETING CONSULTANT | 17:37:00 | Invoiced |
| 11078 | 8/9/2018 | KEPD-MARKETING CONSULTANT | 18:25:00 | Invoiced |
| 11078 | 8/9/2018 | KEPD-MARKETING CONSULTANT | 11:24:30 | Invoiced |
| 11078 | 8/9/2018 | KEPD-MARKETING CONSULTANT | 08:08:00 | Invoiced |

| Contract # | Log Date | Copy Name | S.Log Time | Spot Status |
|------------------------|----------|-----------|------------|-------------|
| Station: KRAJ-FM (161) | | | | |
| Inv Status: (11) | | | | |
| OAR: Unchecked (11) | | | | |
| Rate: 0.00 (11) | | | | |
| 11078 | | | | Trash |
| 11078 | | | | Trash |
| 11078 | | | | Trash |
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| 11078 | | | | Trash |
| 11078 | | | | Trash |
| 11078 | | | | Trash |

Inv Status: Posted (150)

OAR: Unchecked (150)

Rate: 0.00 (150)

| | | | | |
|-------|-----------|----------------------|----------|----------|
| 11078 | 8/9/2018 | MARKETING CONSULTANT | 13:36:00 | Invoiced |
| 11078 | 8/9/2018 | MARKETING CONSULTANT | 05:36:30 | Invoiced |
| 11078 | 8/9/2018 | MARKETING CONSULTANT | 15:37:00 | Invoiced |
| 11078 | 8/9/2018 | MARKETING CONSULTANT | 07:22:00 | Invoiced |
| 11078 | 8/9/2018 | MARKETING CONSULTANT | 09:36:30 | Invoiced |
| 11078 | 8/9/2018 | MARKETING CONSULTANT | 16:36:00 | Invoiced |
| 11078 | 8/9/2018 | MARKETING CONSULTANT | 17:37:00 | Invoiced |
| 11078 | 8/10/2018 | MARKETING CONSULTANT | 18:52:30 | Invoiced |
| 11078 | 8/10/2018 | MARKETING CONSULTANT | 11:22:00 | Invoiced |
| 11078 | 8/10/2018 | MARKETING CONSULTANT | 07:51:00 | Invoiced |
| 11078 | 8/10/2018 | MARKETING CONSULTANT | 09:36:00 | Invoiced |
| 11078 | 8/10/2018 | MARKETING CONSULTANT | 12:36:30 | Invoiced |
| 11078 | 8/10/2018 | MARKETING CONSULTANT | 06:51:00 | Invoiced |
| 11078 | 8/10/2018 | MARKETING CONSULTANT | 14:51:00 | Invoiced |
| 11078 | 8/11/2018 | MARKETING CONSULTANT | 08:21:00 | Invoiced |
| 11078 | 8/11/2018 | MARKETING CONSULTANT | 04:50:00 | Invoiced |
| 11078 | 8/11/2018 | MARKETING CONSULTANT | 21:36:00 | Invoiced |
| 11078 | 8/11/2018 | MARKETING CONSULTANT | 11:21:00 | Invoiced |
| 11078 | 8/11/2018 | MARKETING CONSULTANT | 12:36:00 | Invoiced |
| 11078 | 8/11/2018 | MARKETING CONSULTANT | 09:20:00 | Invoiced |

ADELMAN BROADCASTING, INC.
Spot Detail - ADELMAN BROADCASTING - 10405

EXHIBIT 2

| Contract # | Log Date | Copy Name | S.Log Time | Spot Status |
|------------|-----------|----------------------|------------|-------------|
| 10405 | 4/26/2018 | MARKETING CONSULTANT | 09:51:00 | Invoiced |
| 10405 | 4/26/2018 | MARKETING CONSULTANT | 13:21:00 | Invoiced |
| 10405 | 4/27/2018 | MARKETING CONSULTANT | 14:22:00 | Invoiced |
| 10405 | 4/27/2018 | MARKETING CONSULTANT | 19:36:00 | Invoiced |
| 10405 | 4/27/2018 | MARKETING CONSULTANT | 05:21:00 | Invoiced |
| 10405 | 4/27/2018 | MARKETING CONSULTANT | 09:21:00 | Invoiced |
| 10405 | 4/28/2018 | MARKETING CONSULTANT | 12:21:10 | Invoiced |
| 10405 | 4/28/2018 | MARKETING CONSULTANT | 15:21:00 | Invoiced |
| 10405 | 4/28/2018 | MARKETING CONSULTANT | 07:21:00 | Invoiced |
| 10405 | 4/28/2018 | MARKETING CONSULTANT | 08:51:20 | Invoiced |
| 10405 | 4/29/2018 | MARKETING CONSULTANT | 14:21:20 | Invoiced |
| 10405 | 4/29/2018 | MARKETING CONSULTANT | 16:21:00 | Invoiced |
| 10405 | 4/29/2018 | MARKETING CONSULTANT | 08:21:00 | Invoiced |
| 10405 | 4/29/2018 | MARKETING CONSULTANT | 17:22:00 | Invoiced |
| 10405 | 4/30/2018 | MARKETING CONSULTANT | 18:21:00 | Invoiced |
| 10405 | 4/30/2018 | MARKETING CONSULTANT | 06:23:00 | Invoiced |
| 10405 | 4/30/2018 | MARKETING CONSULTANT | 16:21:00 | Invoiced |
| 10405 | 4/30/2018 | MARKETING CONSULTANT | 14:21:00 | Invoiced |

Station: KGBB-FM (104)

Inv Status: Posted (104)

OAR: Unchecked (104)

Rate: 0.00 (104)

| | | | | |
|-------|----------|----------------------|----------|----------|
| 10405 | 4/5/2018 | MARKETING CONSULTANT | 15:51:00 | Invoiced |
| 10405 | 4/5/2018 | MARKETING CONSULTANT | 09:51:00 | Invoiced |
| 10405 | 4/5/2018 | MARKETING CONSULTANT | 05:37:00 | Invoiced |
| 10405 | 4/5/2018 | MARKETING CONSULTANT | 20:20:00 | Invoiced |
| 10405 | 4/6/2018 | MARKETING CONSULTANT | 15:52:00 | Invoiced |
| 10405 | 4/6/2018 | MARKETING CONSULTANT | 10:20:00 | Invoiced |
| 10405 | 4/6/2018 | MARKETING CONSULTANT | 20:51:00 | Invoiced |
| 10405 | 4/6/2018 | MARKETING CONSULTANT | 05:23:00 | Invoiced |
| 10405 | 4/7/2018 | MARKETING CONSULTANT | 15:38:00 | Invoiced |
| 10405 | 4/7/2018 | MARKETING CONSULTANT | 20:20:00 | Invoiced |
| 10405 | 4/7/2018 | MARKETING CONSULTANT | 05:21:00 | Invoiced |
| 10405 | 4/7/2018 | MARKETING CONSULTANT | 09:50:00 | Invoiced |
| 10405 | 4/8/2018 | MARKETING CONSULTANT | 09:51:00 | Invoiced |
| 10405 | 4/8/2018 | MARKETING CONSULTANT | 20:20:00 | Invoiced |
| 10405 | 4/8/2018 | MARKETING CONSULTANT | 05:21:00 | Invoiced |

ADELMAN BROADCASTING, INC.**Spot Detail - ADELMAN BROADCASTING - 9036****EXHIBIT 2**

| Contract # | Log Date | Copy Name | S.Log Time | Spot Status |
|------------|-----------|------------------------------|------------|-------------|
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 06:21:00 | Involved |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 09:21:00 | Involved |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 13:21:00 | Involved |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 11:22:30 | Involved |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 15:22:30 | Involved |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 17:23:30 | Involved |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 08:35:16 | Involved |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 06:21:00 | Involved |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 13:35:00 | Involved |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 10:51:00 | Involved |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 15:35:00 | Involved |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 17:52:30 | Involved |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 11:21:00 | Involved |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 13:21:00 | Involved |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 15:22:00 | Involved |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 17:22:30 | Involved |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 08:36:16 | Involved |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 07:22:00 | Involved |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 06:21:00 | Involved |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 13:21:00 | Involved |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 10:21:30 | Involved |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 17:21:00 | Involved |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 16:21:00 | Involved |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 06:35:30 | Involved |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 09:21:30 | Involved |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 07:36:16 | Involved |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 13:21:00 | Involved |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 10:22:00 | Involved |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 18:22:00 | Involved |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 15:22:00 | Involved |

Station: KGBB-FM (30)

Inv Status: Posted (30)

OAR: Unchecked (30)

Rate: 0.00 (30)

| | | | | |
|------|-----------|------------------------------|----------|----------|
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 09:53:00 | Involved |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 07:53:00 | Involved |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 11:53:00 | Involved |

ADELMAN BROADCASTING, INC.
Spot Detail - ADELMAN BROADCASTING - 9037

EXHIBIT 2

| Contract # | Log Date | Copy Name | S.Log Time | Spot Status |
|------------|----------|------------------------------|------------|-------------|
| 9037 | 8/8/2017 | MARKETING CONSULTANT 7.21.17 | 15:21:00 | Invoiced |
| 9037 | 8/9/2017 | MARKETING CONSULTANT 7.21.17 | 06:36:00 | Invoiced |
| 9037 | 8/9/2017 | MARKETING CONSULTANT 7.21.17 | 08:36:00 | Invoiced |
| 9037 | 8/9/2017 | MARKETING CONSULTANT 7.21.17 | 11:36:00 | Invoiced |
| 9037 | 8/9/2017 | MARKETING CONSULTANT 7.21.17 | 13:36:00 | Invoiced |
| 9037 | 8/9/2017 | MARKETING CONSULTANT 7.21.17 | 17:36:00 | Invoiced |
| 9037 | 8/9/2017 | MARKETING CONSULTANT 7.21.17 | 15:36:00 | Invoiced |

Station: KLOA-FM (84)

Inv Status: Posted (84)

OAR: Unchecked (84)

Rate: 0.00 (84)

| | | | | |
|------|-----------|------------------------------|----------|----------|
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 09:22:00 | Invoiced |
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 07:22:00 | Invoiced |
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 13:22:00 | Invoiced |
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 10:52:00 | Invoiced |
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 18:22:00 | Invoiced |
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 16:21:00 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 09:22:00 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 06:22:00 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 12:21:00 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 14:22:00 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 18:36:00 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 17:22:00 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 09:22:00 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 07:51:00 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 11:21:30 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 13:21:30 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 16:22:00 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 15:22:00 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 06:35:00 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 08:21:00 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 10:21:00 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 13:35:30 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 15:35:30 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 17:21:00 | Invoiced |
| 9037 | 7/31/2017 | MARKETING CONSULTANT 7.21.17 | 08:21:00 | Invoiced |
| 9037 | 7/31/2017 | MARKETING CONSULTANT 7.21.17 | 07:21:00 | Invoiced |

ADELMAN BROADCASTING, INC.**Spot Detail - ADELMAN BROADCASTING - 9037****EXHIBIT 2**

| Contract # | Log Date | Copy Name | S.Log Time | Spot Status |
|-------------------------|-----------|------------------------------|------------|-------------|
| Station: KRAJ-FM (84) | | | | |
| Inv Status: Posted (84) | | | | |
| OAR: Unchecked (84) | | | | |
| Rate: 0.00 (84) | | | | |
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 08:50:00 | Invoiced |
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 06:35:30 | Invoiced |
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 14:51:00 | Invoiced |
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 10:50:30 | Invoiced |
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 17:50:00 | Invoiced |
| 9037 | 7/27/2017 | MARKETING CONSULTANT 7.21.17 | 18:52:30 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 09:21:00 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 06:21:00 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 11:21:00 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 14:21:00 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 17:21:00 | Invoiced |
| 9037 | 7/28/2017 | MARKETING CONSULTANT 7.21.17 | 15:35:30 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 07:53:00 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 06:52:00 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 10:20:00 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 11:21:00 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 15:36:00 | Invoiced |
| 9037 | 7/29/2017 | MARKETING CONSULTANT 7.21.17 | 16:35:00 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 09:50:30 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 06:35:30 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 11:36:00 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 14:36:00 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 17:36:00 | Invoiced |
| 9037 | 7/30/2017 | MARKETING CONSULTANT 7.21.17 | 16:21:00 | Invoiced |
| 9037 | 7/31/2017 | MARKETING CONSULTANT 7.21.17 | 08:21:00 | Invoiced |
| 9037 | 7/31/2017 | MARKETING CONSULTANT 7.21.17 | 06:21:00 | Invoiced |
| 9037 | 7/31/2017 | MARKETING CONSULTANT 7.21.17 | 10:21:00 | Invoiced |
| 9037 | 7/31/2017 | MARKETING CONSULTANT 7.21.17 | 12:21:00 | Invoiced |
| 9037 | 7/31/2017 | MARKETING CONSULTANT 7.21.17 | 17:22:00 | Invoiced |
| 9037 | 7/31/2017 | MARKETING CONSULTANT 7.21.17 | 16:21:00 | Invoiced |
| 9037 | 8/1/2017 | MARKETING CONSULTANT 7.21.17 | 06:20:30 | Invoiced |
| 9037 | 8/1/2017 | MARKETING CONSULTANT 7.21.17 | 08:21:00 | Invoiced |
| 9037 | 8/1/2017 | MARKETING CONSULTANT 7.21.17 | 10:21:00 | Invoiced |
| 9037 | 8/1/2017 | MARKETING CONSULTANT 7.21.17 | 11:21:00 | Invoiced |
| 9037 | 8/1/2017 | MARKETING CONSULTANT 7.21.17 | 15:20:30 | Invoiced |
| 9037 | 8/1/2017 | MARKETING CONSULTANT 7.21.17 | 17:21:00 | Invoiced |
| 9037 | 8/2/2017 | MARKETING CONSULTANT 7.21.17 | 09:21:00 | Invoiced |

ADELMAN BROADCASTING, INC.
Spot Detail - ADELMAN BROADCASTING - 9036

EXHIBIT 2

| Contract # | Log Date | Copy Name | S.Log Time | Spot Status |
|------------|-----------|------------------------------|------------|-------------|
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 13:51:30 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 15:52:30 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 16:53:00 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 07:51:30 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 09:52:00 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 12:52:00 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 11:51:30 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 15:51:30 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 18:52:00 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 06:37:00 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 07:37:30 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 10:36:00 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 12:23:00 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 17:53:00 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 15:52:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 08:23:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 06:23:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 10:23:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 12:20:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 16:21:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 18:23:00 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 09:37:00 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 06:38:00 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 14:36:00 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 11:37:00 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 15:38:00 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 18:38:00 | Invoiced |

Station: KEPD-FM (30)

Inv Status: Posted (30)

OAR: Unchecked (30)

Rate: 0.00 (30)

| | | | | |
|------|-----------|---------------------------------|----------|----------|
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 SP | 06:37:30 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 SP | 08:23:00 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 SP | 10:38:00 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 SP | 14:22:30 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 SP | 15:23:00 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 SP | 16:37:00 | Invoiced |

ADELMAN BROADCASTING, INC.
Spot Detail - ADELMAN BROADCASTING - 9036

EXHIBIT 2

| Contract # | Log Date | Copy Name | S.Log Time | Spot Status |
|-------------------------|-----------|------------------------------|------------|-------------|
| Station: KRAJ-FM (30) | | | | |
| Inv Status: Posted (30) | | | | |
| OAR: Unchecked (30) | | | | |
| Rate: 0.00 (30) | | | | |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 08:52:00 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 06:50:00 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 13:51:30 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 10:51:30 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 17:52:30 | Invoiced |
| 9036 | 7/22/2017 | MARKETING CONSULTANT 7.21.17 | 16:52:00 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 09:37:00 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 06:20:00 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 14:21:30 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 12:22:00 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 17:35:00 | Invoiced |
| 9036 | 7/23/2017 | MARKETING CONSULTANT 7.21.17 | 16:22:00 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 06:50:00 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 08:50:00 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 10:20:00 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 13:20:00 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 17:50:00 | Invoiced |
| 9036 | 7/24/2017 | MARKETING CONSULTANT 7.21.17 | 15:51:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 07:21:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 09:21:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 12:21:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 14:20:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 18:53:00 | Invoiced |
| 9036 | 7/25/2017 | MARKETING CONSULTANT 7.21.17 | 15:51:00 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 09:50:00 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 08:35:00 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 14:50:30 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 11:21:00 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 15:51:00 | Invoiced |
| 9036 | 7/26/2017 | MARKETING CONSULTANT 7.21.17 | 18:51:00 | Invoiced |

Station: KLOA-FM (30)

Inv Status: Posted (30)

OAR: Unchecked (30)

Rate: 0.00 (30)

*

ADELMAN BROADCASTING, INC.
Spot Detail - ADELMAN BROADCASTING - 8867

EXHIBIT 2

| Contract # | Log Date | Copy Name | S.Log Time | Spot Status |
|------------|-----------|----------------------|------------|-------------|
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 14:24:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 16:24:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 18:39:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 09:53:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 07:52:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 14:53:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 11:52:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 18:53:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 16:53:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 07:52:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 08:52:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 13:51:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 10:52:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 17:52:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 18:52:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 09:36:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 06:37:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 13:37:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 10:37:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 15:37:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 18:38:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 07:38:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 09:38:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 10:38:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 12:38:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 16:21:30 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 17:36:00 | Invoiced |

Station: KEPD-FM (30)

Inv Status: Posted (30)

OAR: Unchecked (30)

Rate: 0.00 (30)

| | | | | |
|------|-----------|----------------------|----------|----------|
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 09:17:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 07:17:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 13:17:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 11:18:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 15:17:15 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 18:17:00 | Invoiced |

ADELMAN BROADCASTING, INC.
Spot Detail - ADELMAN BROADCASTING - 8867

EXHIBIT 2

| Contract # | Log Date | Copy Name | S Log Time | Spot Status |
|------------|-----------|----------------------|------------|-------------|
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 08:53:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 06:23:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 10:23:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 13:23:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 15:22:30 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 17:23:30 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 08:21:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 07:21:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 12:22:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 10:21:30 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 17:21:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 15:21:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 09:54:30 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 08:36:16 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 14:22:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 13:21:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 17:21:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 15:35:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 08:35:16 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 07:22:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 10:21:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 12:21:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 18:21:30 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 15:21:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 08:22:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 07:22:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 10:22:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 12:21:30 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 15:21:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 16:21:00 | Invoiced |

Station: KG8B-FM (30)

Inv Status: Posted (30)

OAR: Unchecked (30)

Rate: 0.00 (30)

| | | | | |
|------|-----------|----------------------|----------|----------|
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 06:24:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 08:24:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 10:24:00 | Invoiced |

ADELMAN BROADCASTING, INC.
Spot Detail - ADELMAN BROADCASTING - 8867

EXHIBIT 2

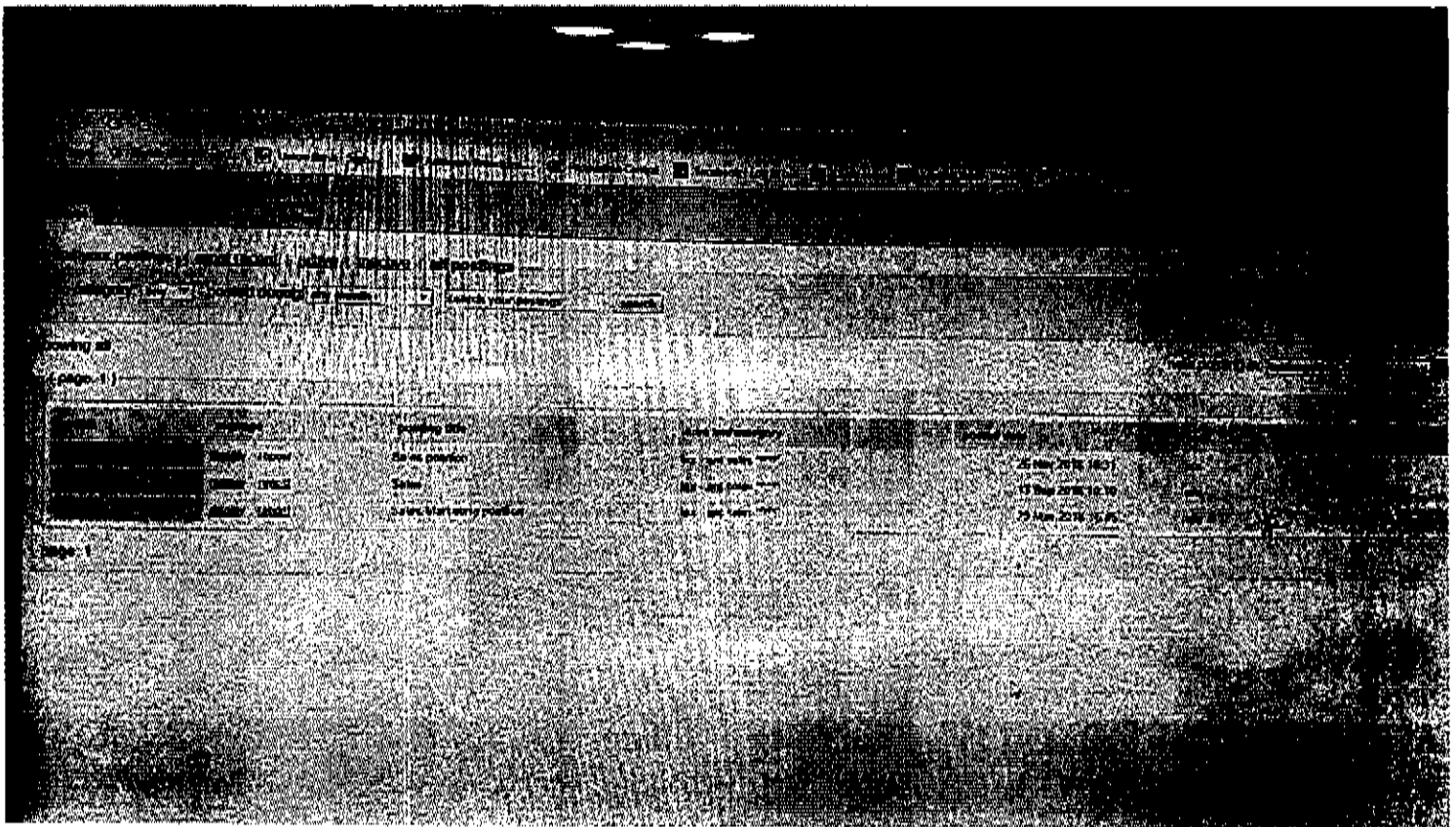
| Contract # | Log Date | Copy Name | S.Log Time | Spot Status |
|-------------------------|-----------|----------------------|------------|-------------|
| Station: KRAJ-FM (30) | | | | |
| Inv Status: Posted (30) | | | | |
| OAR: Unchecked (30) | | | | |
| Rate: 0.00 (30) | | | | |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 06:52:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 08:52:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 10:50:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 12:50:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 17:51:00 | Invoiced |
| 8867 | 6/23/2017 | MARKETING CONSULTANT | 18:52:30 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 09:21:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 07:51:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 12:52:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 11:51:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 17:51:00 | Invoiced |
| 8867 | 6/24/2017 | MARKETING CONSULTANT | 16:35:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 09:35:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 06:20:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 13:36:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 12:21:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 15:21:00 | Invoiced |
| 8867 | 6/25/2017 | MARKETING CONSULTANT | 16:22:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 06:21:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 09:36:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 11:21:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 14:51:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 18:53:00 | Invoiced |
| 8867 | 6/26/2017 | MARKETING CONSULTANT | 16:51:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 09:21:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 07:21:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 10:36:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 12:21:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 17:21:00 | Invoiced |
| 8867 | 6/27/2017 | MARKETING CONSULTANT | 18:52:00 | Invoiced |

Station: KLOA-FM (30)

Inv Status: Posted (30)

OAR: Unchecked (30)

Rate: 0.00 (30)



CL los angeles > antelope valley > sales >

EXHIBIT 2

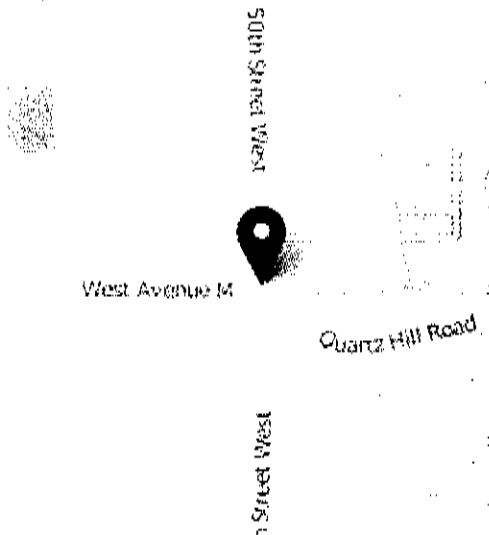
[logged in as colleenwardlaw@gmail.com] [log out]

This posting has expired from craigslist. [?]

Repost this Posting You will have the opportunity to make changes before it is made live. [\[learn more\]](#)

CL

Sales/Marketing position (Quartz Hill)



compensation: **Based upon experience**

employment type: **full-time**

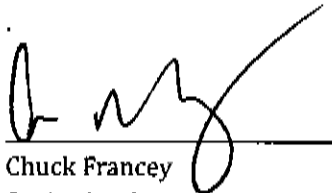
Looking for a self- motivated, energetic and detail oriented individual who desires a career in the exciting field of Radio Broadcasting. Bi-lingual encourage to apply. Equal Opportunity Employer

EXHIBIT 3



April 29, 2019

I, Chuck Francey, Senior Marketing Consultant for Adelman Broadcasting, Inc. attended and spoke for the outreach program discussing broadcasting career opportunities at the Quartz Hill High School March, 2016 and March 2017



Chuck Francey
Senior Marketing Consultant

**EXHIBIT 3**

Colleen Wardlaw <colleenwardlaw@gmail.com>

Fwd: Your Antelope Valley College Employer Account

1 message

Colleen Wardlaw <colleenwardlaw@gmail.com>

Tue, Jul 31, 2018 at 11:45 AM

To: Melissa Hernandez <melissahernandezradio@gmail.com>

Post for office intern.

COLLEEN WARDLAW-VICE PRESIDENT

ADELMAN BROADCASTING, INC

*KGBB*KRAJ*KEPD*KLOA-FM*KZIQ*KGIL*KLOA-AM*KWDJ*KTEA*KCJZ

760-498-7567 CELL

42010 50TH STREET WEST, QUARTZ HILL, CA 93536 P:661.718.1552 EXT 209 F:661.718.1553

731 N. BALSAM STREET, RIDGECREST, CA 93555 P:760.371.1700 F: 760-371-1824

1306 TAMSON DRIVE, STE 202, BLDG B, CAMBRIA, CA 93428 P: 805.924.0103

----- Forwarded message -----

From: **Jackie Hopson** <adelmanoperations@gmail.com>

Date: Tue, Jul 31, 2018 at 11:08 AM

Subject: Fwd: Your Antelope Valley College Employer Account

To: Colleen Wardlaw <ColleenWardlaw@gmail.com>, Bob Adelman <bobadelman1@gmail.com>

To post here you need the log in info

username jackiebobfm

password dtess1951

go to <https://www.collegecentral.com/avc> whenever you want to post jobs and search résumés.

----- Forwarded message -----

From: **Jackie Hopson** <adelmanoperations@gmail.com>

Date: Tue, Jul 31, 2018 at 11:05 AM

Subject: Re: Your Antelope Valley College Employer Account

To: wwallace@avc.edu

Awesome,

Thank you very much!

Jackie Hopson

On Tue, Jul 31, 2018 at 10:58 AM, <wwallace@avc.edu> wrote:

- : Your company has been approved to post jobs and search résumés online at Antelope Valley College.
- : Please use this secured link to activate your account and then you can begin posting jobs.
- : In the future, go to <https://www.collegecentral.com/avc> whenever you want to post jobs and search résumés. Please include a salary or salary range in the position description as you will achieve better results.
- : Thank you for your interest in recruiting with us!

**EXHIBIT 3**

Colleen Wardlaw <colleenwardlaw@gmail.com>

Fwd: Invitation to participate in the 23rd Semi-Annual Job Fair

1 message

adelmanoperations <adelmanoperations@gmail.com>

Tue, Jul 18, 2017 at 6:14 PM

To: adelmanproduction@gmail.com, Colleen Wardlaw <colleenwardlaw@gmail.com>

I want to do this please.

Jackie

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Wilda Wallace <wwallace@avc.edu>

Date: 7/18/17 8:13 AM (GMT-08:00)

To: adelmanoperations@gmail.com

Subject: Invitation to participate in the 23rd Semi-Annual Job Fair

Invitation to Participate

23rd Semi-Annual Fall Career Information & Job Fair

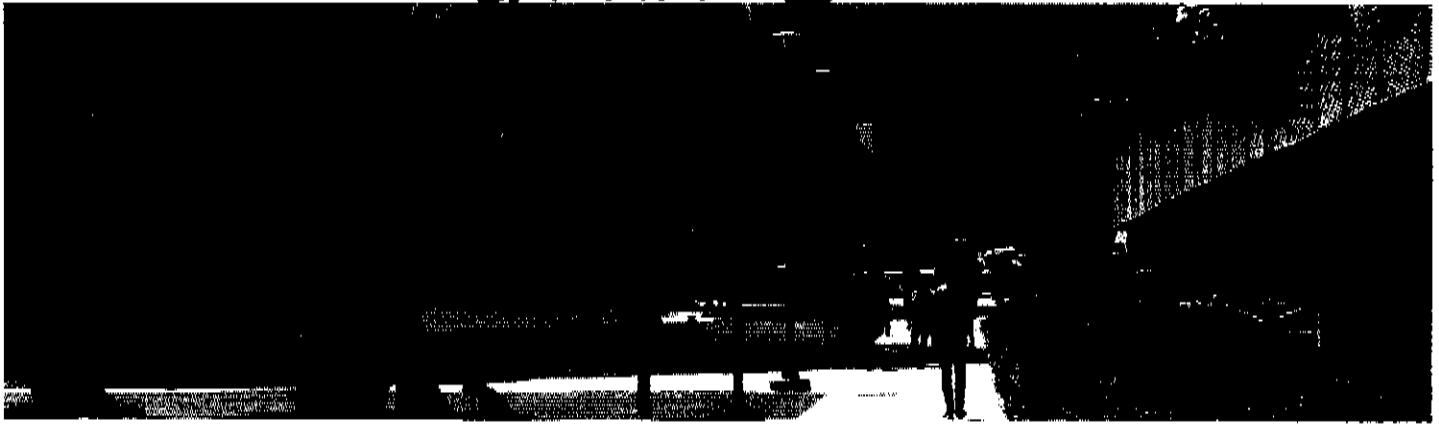
Antelope Valley College**3041 West Ave. K****Lancaster, CA 93536****Library Plaza****September 13, 2017****3:00 P.M.-7:00 P.M.**

**This is a no-fee event
Open to the community
Free parking from 2pm-8pm**

**Attached please find the registration form and keep in mind the
last day to register is September 1, 2017**

Hope to see you there.

**Once we receive your registration we will send confirmation.
The first week of September parking pass and campus map will be sent out**

EXHIBIT 3

[Home \(/\)](#) / [AVC News \(/news\)](#) / 22nd Semi-Annual Career Information & Job Fair

22nd Semi-Annual Career Information & Job Fair

Submitted by rmorgan12 on Thu, 09/29/2016 - 16:44

22nd Semi-Annual Career Information & Job Fair

The Semi-Annual Career Information and Job Fair

(<https://www.avc.edu/sites/default/files/news/2016FALLJOBFAIRFLYER.pdf>)

on Wednesday, October 12 from 3 pm to 6 pm. Remember to dress for success and bring copies of your resume. This event is open to the community and free parking is available.

For more information, please contact the Job Placement Center at 661-722-6358 or by email at jpc@avc.edu (<mailto:jpc@avc.edu>).



Last updated: September 29, 2016

(MON) APR 28 2018 10:57

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User /Account :
DESTINATION  : Melissa
ADDRESS      : desktop-6e013d6

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| PAGES | : 32page |
| RESULT | : OK |

a. Adelman Broadcasting, incorporated hereinafter multiple broadcast stations serving the Ridgecrest area. The combination of these stations comprise the time employees. Attached hereto as Exhibit I are EEO Reports available online at www.adelma.com, Public Inspection at www.adelmainfo.org/broadcasting/.

b. The EEO Reports provides the reader with information about the "unit"; During 2016-2017, one (1) Assistant, one (1) individual was hired full time as a Receptionist; one (1) individual was hired part time as a Receptionist; individuals were hired as a Traffic Coordinator, Director/Operations for the Lancaster/Palmdale area. Indeed and Radio ads ran on KGBB-FM, KEPP-FM, one spot detail log per station and have maintained one (1) individual was hired full time as Salesperson (Craiglist), indeed and Radio ads ran on KGBB-FM provided one spot detail log per station and have Exhibit 2.

c. During 2016-2017 Central Coast hired two (2) In-person salespeople (full-time, 22 applications received).

This letter is in response to the EEO audit letter dated February 19, 2018 from KGBB (FM), Ridgecrest, California (the "Station" or "KGBB Audit Data Requested" (Paragraph 3 of the Audit Letter)).

Dear Sir or Madam:

Re: EEO Audit Response for KGBB (FM), Ridgecrest, Ca 9

Washington DC 20554

445 12 Street, S. W.

Policy Division - Media Bureau
Federal Communications Commission

REC Staff

April 25, 2019

