

## Exhibit

By this Form 316, James L. Brewer seeks Commission consent to take positive control of J.L. Brewer Broadcasting of Cleveland, LLC. This Form 316 is appropriate for this transaction, because James L. Brewer was previously passed on by the Commission as part of a Form 314 assignment of license (see CDBS File No. BALH - 20020326AAS, granted 5/20/2002) and less than 50% of the voting interests in the company are being transferred.

This transfer is the result of two actions. There was a redemption by the company of the membership interests of James L. Brewer II. James L. Brewer II was a minority member in J.L. Brewer Broadcasting of Cleveland, LLC ("JLBC") until the time of his death in 2018. Following his death, upon the winding up of his estate, his estate assigned his membership interests in JLBC back to the company. Because these interests were redeemed by the company, and as there was discussion of these interests possibly being reassigned to other members, it was not noted that the redemption caused his father's interest in the company to become one of positive control.

In addition, simultaneously with the filing of this application, there is a Form 316 application being filed for the merger of another Brewer family owned company, J.L. Brewer Broadcasting, LLC into JLBC. JLBC will be the surviving entity. The interests reflected in this application reflect the final stock interests after giving effect to these two actions, resulting in the assumption of positive control by James L. Brewer.