

**IDENTIFICATION OF PRESENT AND PROPOSED ATTRIBUTABLE INTERESTS IN  
SUN BROADCASTING INC. AND DESCRIPTION OF TRANSACTIONS  
CONSTITUTING TRANSFER OF CONTROL**

**LAST LONG FORM TRANSFER OF CONTROL.**

The last long form transfer of control of Sun Broadcasting, Inc (“Sun”)<sup>1</sup> was authorized in FCC File No. BTCDT-20120621ABN, granted August 6, 2012, and consummated September 24, 2012. The transfer of control approved transfer of 100% of the voting equity of Sun from Joseph C Schwartzel Living Trust to Joseph C. Schwartzel Irrevocable Family Trust of 2011 (“Irrevocable Trust”).<sup>2</sup> The attributable owners of the Sun are:

<u>Name</u>	<u>Number of Shares</u>	<u>Percent Votes</u>
Sun	0	0
Irrevocable Trust Shareholder	1000	100
James W. Schwartzel <sup>3</sup> President, Director	0	0

The attributable owners of Irrevocable Trust are:

<u>Name</u>	<u>Percent Ownership</u>	<u>Percent Votes</u>
Irrevocable Trust	100	0
Joseph C. Schwartzel <sup>4</sup> Grantor	0	0
James Schwartzel Trustee/Beneficiary	0	50
Anne Shoemaker <sup>5</sup> Trustee/Trust Protector	0	50
Miriam D. Schwartzel <sup>6</sup> Beneficiary	0	0

**PROPOSED CHANGES IN ATTRIBUTABLE OWNERSHIP**

In this application, Anne Shoemaker seeks authority to withdraw from broadcasting by exiting her roles at the Irrevocable Trust. There is no agreement requiring this change in attributable

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<sup>1</sup> Sun Broadcasting Inc.’s FCC Registration Number (“FRN”) is 0015050008.

<sup>2</sup> The FRN for the Irrevocable Trust is 0022066831.

<sup>3</sup> The FRN for James W. Schwartzel is 0019414523.

<sup>4</sup> The FRN for Joseph C. Schwartzel is 0019414481.

<sup>5</sup> The FRN for Anne Shoemaker is 0022112676.

<sup>6</sup> The FRN for Miriam D. Schwartzel is 0022111546.

ownership. It is solely a matter of Ms. Shoemaker's private decision to leave her roles at the Irrevocable Trust. After Ms. Shoemaker's departure, the attributable owners of the Irrevocable Trust shall be:

<u>Name</u>	<u>Percent Ownership</u>	<u>Percent Votes</u>
Irrevocable Trust	100	0
Joseph C. Schwartzel Grantor	0	0
James Schwartzel Trustee/Beneficiary	0	100
Miriam D. Schwartzel Beneficiary	0	0

Each person holding an attributable interest in the Irrevocable Trust is a United States citizen. The mailing address for these persons is c/o Sun Broadcasting Inc., 2824 Palm Beach Blvd., Fort Myers, Florida 33916.

As adult beneficiaries of the Irrevocable Trust, James Schwartzel and Miriam Schwartzel are entitled, but not required, to elect a new trust protector. The trust agreement retains the following Article XVII (F) subordinating all actions administrating the Irrevocable Trust to FCC Law:

*FCC Matters. It is the intention of the parties that, for so long as the corpus of any trust created by, or administered pursuant to, this instrument includes an attributable interest in a broadcast station, FCC Law shall take precedence over any contrary right or obligation expressed herein. Each right granted and each obligation undertaken herein are granted or undertaken to the full extent permitted by FCC Law, and only to the extent permitted by FCC Law. Specifically, to the extent required by FCC law: (i) Grantor shall not retain a right of reversion in any FCC license or a right to reassignment of an FCC license or a right to use the facilities of any broadcast station included in the corpus of any trust created by or administered pursuant to this instrument; (ii) No transfer of control or assignment of a broadcast station license shall occur without prior application to and approval by the Federal Communications Commission ("FCC"); (iii) No attributable interest in a broadcast licensee shall be acquired or retained by any person lacking the character qualifications to be an FCC licensee; (iv) No foreign national or company organized under the laws of a foreign state shall acquire or retain a direct or indirect ownership interest in a broadcast licensee exceeding the limits established by FCC Law; (v) No person shall acquire or retain an attributable interest in a broadcast licensee if that interest, in combination with other attributable media interests held by that person, exceeds the permissible ownership limits prescribed in FCC Law; and (vi) Each person administering or benefitting from a trust created by or administered pursuant to this instrument shall be under a continuing obligation to provide all information required by the FCC in any report, application or other inquiry made by the FCC with respect to an attributable interest in a broadcast station held by the trust. The provisions of this section (other than the provisions of subsection (iv), above) shall apply only when a trust holds an attributable interest in a broadcast license.*

*As used herein the term “FCC Law” means (a) the Communications Act of 1934, as amended, 47 USC §151 et. seq.; (b) the Rules and Regulations of the FCC, 47 CFR § 0.1 et. seq.; (c) the policies and case law of the FCC implementing and interpreting (a) and (b), above; (d) the decisions of the United States Courts with respect to (a), (b) and (c), above; and (e) all of (a), (b), (c) and (d) above as they presently exist and as they may be amended, supplemented, changed and/or superseded (by legislation, rulemaking, adjudication or otherwise) in the future.*