

Narrative Description of Transfer of Control

The following is the current ownership of the licensees described in the instant transfer of control application.

River City Broadcasting, LLC ("River City"), a Florida limited liability company, is the licensee of WJXL-FM, Jacksonville Beach, Florida.

Seven Bridges Radio, LLC ("Seven Bridges"), a Florida limited liability company, is the licensee of WJXL(AM), Jacksonville Beach, Florida.

River City and Seven Bridges (together, the "Licensees") are wholly owned by Emerald Broadcast Partners, LP ("Emerald, LP"), a Delaware limited partnership. Grand Slam Media, LLC ("Grand Slam"), a Florida limited liability company, is the sole General Partner of Emerald, LP. The limited partners in Emerald, LP are not materially involved, directly or indirectly, in the management or operation of the media-related activities of the partnership.

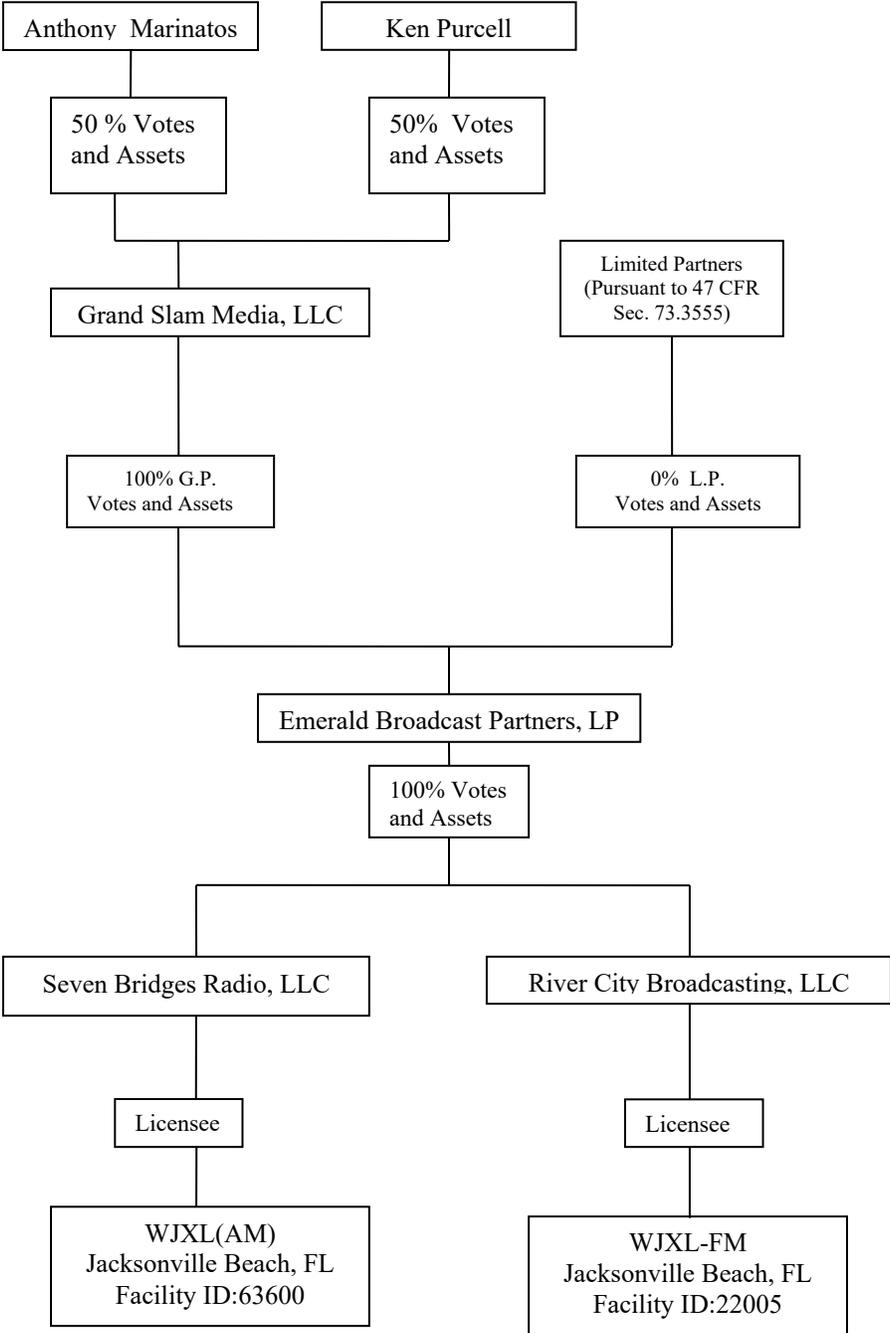
Grand Slam is owned by Anthony Marinatos and Ken Purcell. All ownership interests in Grand Slam are held by Mr. Marinatos and Mr. Purcell who hold and vote their respective equity and voting interests as follows: Marinatos (50%) and Purcell (50%). The preceding parties presently have no attributable interests in any media of mass communication, including broadcast stations, other than those held by River City and Seven Bridges.

- The officers and directors of Emerald, LP are Ken Purcell, President, and Anthony Marinatos, Chief Financial Officer.
- The officers and directors of Grand Slam are Ken Purcell, President, and Anthony Marinatos, Chief Financial Officer.
- Anthony Marinatos is the Manager/officer of River City.
- Steven L. Griffin is the President and Director of Seven Bridges.

All of the officers, directors, attributable partners and members of River City, Seven Bridges, Emerald, LP and Grand Slam are United States citizens.

A chart of this current ownership structure appears on the following page.

Current Ownership Structure



The following describes the proposed transfer of control of the Licensees and the new ownership of them, for which consent is requested in this application. The purpose of this application is to obtain the FCC's consent to a restructuring of the ownership of the Licensees. There is no "purchase price" or sales documents involved. The parties to the proposed restructuring simply are in agreement to take the following actions.

Grand Slam will be removed from any direct or indirect ownership of the Licensees. Emerald, LP will be replaced from a limited partnership to a Delaware limited liability company named Emerald Broadcast, LLC ("Emerald, LLC"). Emerald, LLC will wholly own the Licensees and Emerald, LP will have no connection to the Licensees.

The voting control and equity ownership of Emerald, LLC, which would include some, but not all, of the officers, directors, owners and limited partners currently indirectly connected to the Licensees, is as follows (percentages of voting and equity interests are the same for each person and entity).

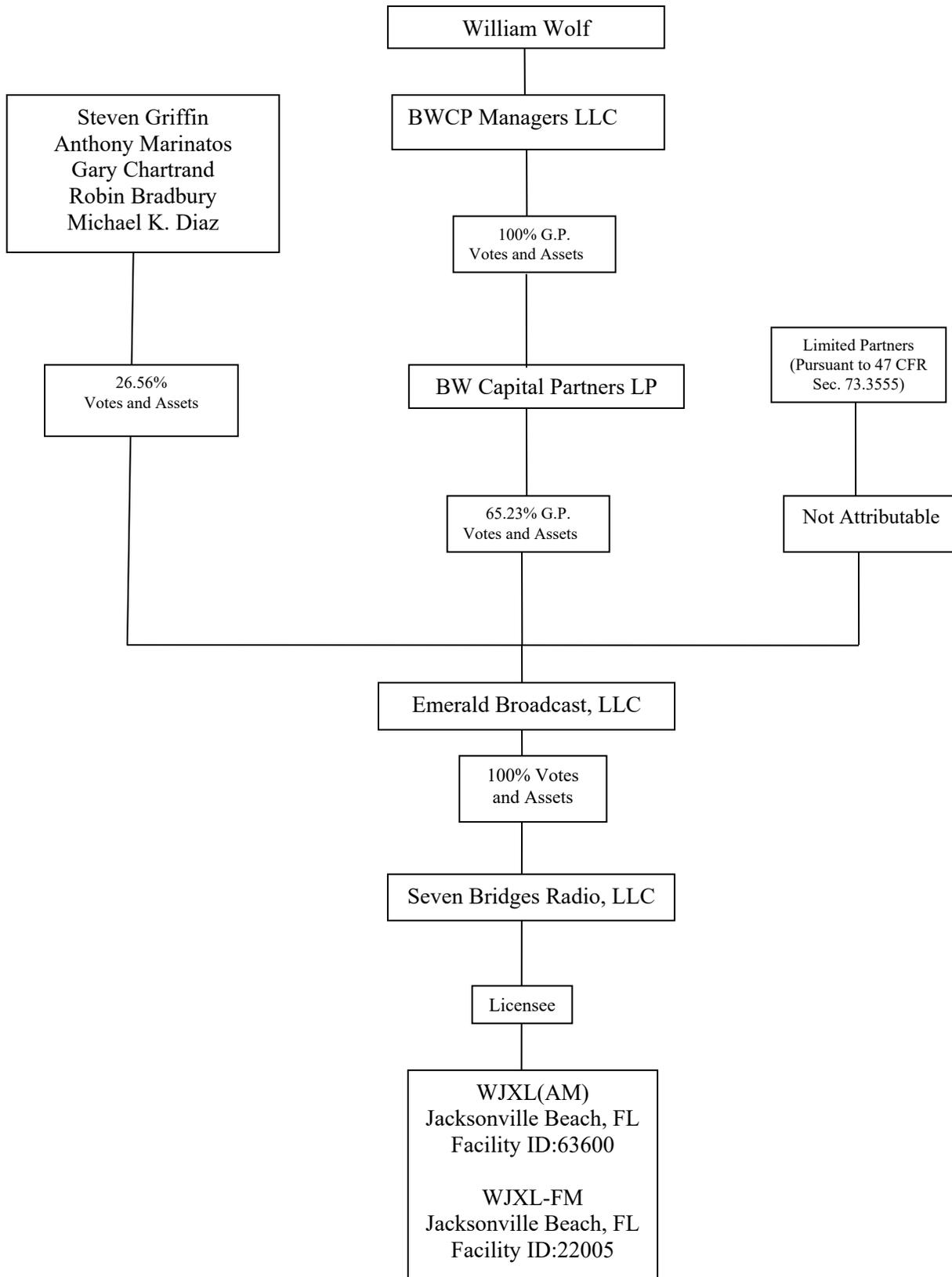
<u>Name</u>	<u>Title/Position</u>	<u>Voting/Equity</u>
Steven Griffin	President & General Manager	0.93%
Anthony Marinatos	Treasurer	1.25%
Michelle D. Thomas	Secretary	0
Gary Chartrand	None	10.25%
Robin Bradbury	None	9.32%
Michael K. Diaz	None	4.83%
BW Capital Partners LP	None	65.23%

BW Capital Partners LP ("BW Capital") is a limited partnership. BWCP Managers LLC is a limited partner of BW Capital and also is the single general partner of BW Capital. The sole manager of BWCP Managers LLC is William Wolf. Terry Diamond and Bruce Beerbower are the only directors of BW Capital, which has no officers. There are a number of limited partners who, or which, are investors in BW Capital. None of those limited partners are materially involved, directly or indirectly, in the management or operation of BW Capital, and therefore, are not reportable to the Commission. A certification to that effect is part of this exhibit.

All of the officers, directors, attributable partners and members of River City, Seven Bridges, Emerald, LLC, BWCP Managers LLC and are BW Capital are United States citizens. A certification to that effect is part of this exhibit. No parties reported in this application would have any attributable interests in broadcast stations other than WJXL(AM) and FM.

In addition, concurrent with the instant transfer of control application, the parties have submitted a pro forma assignment of license (FCC Form 316) for the assignment of the license of River City to Seven Bridges under FCC File No. BTCH-20200811AAL. Upon FCC consent to this transfer of control application, and the pro forma assignment of license application, the parties intend to consummate the assignment of the license of WJXL-FM, eliminate River City as an entity, and then conclude the overall transfer of control. A chart of the proposed ownership structure appears on the following page, showing the ownership upon conclusion of that assignment of license application and the instant transfer of control application.

Proposed Ownership Structure



CERTIFICATIONS

The ownership structure proposed in this application would be in compliance with the Commission's restrictions on foreign ownership and control of broadcast licensees, and the proposed limited partners of BW Capital Partners LP should be considered insulated from (i.e. not holding) any attributable ownership interests in Seven Bridges, based upon the following certifications.

Foreign Ownership

The parties to this application hereby certify that foreign individuals and/or entities do not hold more than 25 percent of voting or equity interests (including non-attributable equity interests) in any of the controlling parent entities of Seven Bridges, the proposed licensee of the broadcast stations subject to this application.

Attribution

The parties to this application hereby certify that, under the standards set forth under Section 73.3555 of the Commission's rules, and specifically Note 2(f) to that rule, that the limited partners of BW Capital Partners LP are not materially involved, directly or indirectly, in the management or operation of the media-related activities of that partnership and of Seven Bridges. The parties also certify that that the relevant state statute authorizing the existence and operation of BW Capital Partners LP permits insulation of its limited partners from holding attributable ownership interests in Seven Bridges consistent with the rules and policies of the FCC.