

EXHIBIT A

DECLARATION AND VERIFICATION OF LES VANN

Declaration and Verification of Les Vann

I, Les Vann, hereby declare, under penalty of perjury, as follows:

1. I am greater than eighteen years of age and am competent to make this Declaration and Verification.
2. I am the Vice President and General Manager of WHNS(TV) (“WHNS”), Greenville, South Carolina, and I have held this position since April 2017.
3. WHNS is the Fox affiliate for the Greenville-Spartanburg-Asheville-Anderson Designated Market Area. WHNS serves four counties located in Georgia, including Stephens County, Franklin County, Elbert County, and Hart County.
4. WHNS has been carried on DIRECTV and DISH in Stephens County, Georgia, at least since February of 2000 (DIRECTV) and September of 2000 (DISH) in the Greenville-Spartanburg-Asheville-Anderson DMA. WHNS is carried on Channel 21 on DISH and on Channel 21 on DIRECTV in Stephens County.
5. WHNS regularly provides local news, weather, school closings, and EAS alerts, and other information of local interest to the residents of Stephens County and the other three Georgia Counties in the DMA. Since February 2016, WHNS has aired dozens of stories focused on Stephens County, Franklin County, Elbert County, Hart County, and their communities. Some recent examples are attached to this Declaration as Attachments 1, 2, and 3.
6. WHNS aired two Atlanta United soccer games during the team’s inaugural season in 2017 and two games during the team’s 2018 season.
7. WHNS aired ten Atlanta Falcons games during the 2016 regular season, 5 Atlanta Falcons games during the 2017 regular season, and, as of the date hereof, 4 Atlanta Falcons games during the 2018 regular season.
8. I verify that the factual matters contained in the foregoing Joint Opposition to Petitions for Special Relief are true and correct to the best of my information, knowledge, and belief.

[signature appears on the following page]

I declare, under penalty of perjury, that the foregoing Declaration and Verification is true and accurate to the best of my knowledge, information, and belief.

12-21-18
Date

Les Vann
Les Vann
Vice President and General Manager
WHNS(TV)

ATTACHMENT 1

EXAMPLES OF WHNS PROGRAMMING COVERING STEPHENS COUNTY

A final salute for Army Cpl. Terrell Fuller

Posted Aug 11, 2018



A final salute for Army Cpl. Terrell Fuller

GBI: Man accused of murdering Toccoa teen also charged in another teen's shooting

By Amanda Shaw and Matthew Ablon

Posted Aug 8, 2018



The Georgia Bureau of Investigation is investigating a shooting in Toccoa that left an 18-year-old dead Wednesday afternoon.

According to the bureau, the shooting was reported around 1:40 p.m. on South Alexander Street. On Thursday, GBI agents identified the victim as Joel Keshon Green, 18, of Toccoa.

Soldier killed in Korean War to be properly buried

By Matthew Ablon

Posted Aug 2, 2018



The remains of a soldier killed in the Korean War are being returned to his family for a burial with full military honors.

The Defense POW/MIA Accounting Agency (DPAA) announced on Thursday that Army Cpl. Terrell J. Fuller, 20, of Toccoa will be buried on August 11 in his hometown.

Georgia voters divided but pass Sunday alcohol sales in Stephens County, City of Toccoa

By Sierra Hancock

Posted May 23, 2018



Voters in Georgia took to the polls on Tuesday to decide if alcohol sales should be allowed on Sundays in Stephens County.

Residents in Stephens County and the City of Toccoa cast their votes on whether to authorize a permit that would regulate the sale of malt beverages and wine on Sundays from 12:30 p.m. to 11:30 p.m.

Massive sinkhole opens up in Stephens County

By Amanda Shaw

Posted May 16, 2018



Crews are working to repair damage to a Toccoa roadway after a sinkhole opened up during heavy rain on Wednesday.

The National Weather Service said Deer Chase was washed out and emergency management officials were working to repair the hole. The roadway is closed at Crawford Hills Circle.

GA teen injured in hit and run, driver still on the loose

By Brookley Cromer

Posted Feb 1, 2018



Stephens County deputies are looking for a driver they say hit a teen, and then fled the scene.

Deputies said the victim, 16-year-old Zoey Dysinger, was struck by an SUV along Oak Valley Road near Abbey Lane in Toccoa, GA early Sunday morning.

Deputies found Zoey lying in a ditch. From there, she was rushed to the hospital.

Troopers: Upstate man to face charges after chase began in GA, ended in head-on crash in SC

By Dal Kalsi
Posted Aug 16, 2017



Troopers with the Georgia State Patrol said a Spartanburg County man will face charges after a chase that began in the Toccoa area ended with a crash in South Carolina on Tuesday.

Troopers said the chase began around 7:30 a.m. on Highway 17 when a trooper tried to pull over a motorcycle that would not stop.

ATTACHMENT 2

**LIST OF WHNS STORIES COVERING
STEPHENS, HART, ELBERT, AND FRANKLIN COUNTIES**

WHNS NEWS STORIES COVERING STEPHENS, ELBERT, FRANKLIN, AND HART COUNTIES

COUNTY	STORY SLUG	ON-AIR	DATE
STEPHENS	Toccoa home destroyed in fire	YES	13-Feb-16
STEPHENS	Inmate dies after being found unresponsive in Stephens Co. jail	NO	26-Feb-16
STEPHENS	Deputies searching for stolen giraffe statue, possibly spotted in Anderson Co.	NO	13-Apr-17
STEPHENS	Upstate law enforcement, Hazmat respond after unknown substance found in Toccoa, GA	NO	22-Jun-17
STEPHENS	Georgia State Patrol identifies 3 teens killed in Stephens Co. crash	YES	30-Jul-17
STEPHENS	Investigators issue 30 arrest warrants, seize one pound of meth in 8-month-long drug bust	YES	31-Jul-17
STEPHENS	Troopers: Upstate man to face charges after chase began in GA, ended in crash in SC	NO	16-Aug-17
STEPHENS	Investigators issue 30 arrest warrants, seize one pound of meth in 8-month-long drug bust	NO	28-Aug-17
STEPHENS	GA teen injured in hit-and-run, driver still on the loose	YES	1-Feb-18
STEPHENS	GA teen injured in hit-and-run, driver still on the loose (update)	YES	1-Feb-18
STEPHENS	Massive sinkhole opens up in Stephens Co.	YES	16-May-18
STEPHENS	Stephens Co. voters divided, but pass Sunday alcohol sales in Stephens Co, City of Toccoa	YES	23-May-18
STEPHENS	Remains of soldier killed in Korean War laid to rest	YES	2-Aug-18
STEPHENS	Shooting in Toccoa	YES	8-Aug-18
STEPHENS	GBI: Man accused of murdering Toccoa teen also charged in another shooting	YES	10-Aug-18
STEPHENS	Final salute for Army Cpl. Terrell Fuller (of Stephens County)	YES	11-Aug-18
HART	Firefighters battling blaze at Georgia canola plant	NO	9-Dec-16
HART	Woman killed in rollover crash in Hart Co.	NO	3-Feb-17
HART	Storms sent trees crashing down, partially tore roofs off homes in Hart Co.	YES	6-Apr-17
HART	Severe storm rips through Hart County	YES	6-Apr-17
HART	Deputies seek armed and dangerous suspect in Hart Co.	YES	13-Jul-17
HART	Nestle Purina brings hundreds of jobs, \$320 million investment to Hart Co.	YES	27-Sep-17
HART	Sheriff identifies 23-year-old drowning victim pulled from Lake Hartwell	YES	29-Nov-17
HART	Hart County teacher charged with child molestation	YES	7-Dec-17
HART	DHEC conducting SC investigation after confirmed cases of drug-resistant TB in Northeast GA	YES	30-Jan-18
HART	Deputies: Man arrested after child porn found during burglary investigation	YES	1-Feb-18
HART	Hart County deputies seek suspect wanted in homicide	YES	2-Mar-18
HART	Man accused of killing wife, a mother of 3, arrested in Anderson Co.	YES	7-Mar-18
HART	Hartwell mayor confirms health insurance cancellations for city employees	YES	3-Apr-18
HART	Doctor who practiced in Upstate, NE Georgia arrested on child molestation charges	YES	10-Apr-18
HART	Police: Grandmother arrested after baby killed in dog attacked received multiple past citations	YES	12-Apr-18
HART	Five firefighters treated for chemical exposure after battling house fire	YES	28-Apr-18
HART	Hart Co. deputies seek suspect wanted in homicide (update)	YES	2-Mar-18
HART	Dispatch: fire crews working to control house fire in Hart Co.	YES	15-May-18
HART	Hart County grandma strangles bobcat during attack	YES	15-Jun-18
HART	Hartwell mission group stranded in Haiti amid riots	YES	7-Jul-18
HART	Hartwell mission group comes home from Haiti	YES	13-Jul-18
ELBERT	Georgia man urges everyone to not drive distracted after wife paralyzed	YES	28-Aug-16
ELBERT	GBI: Man dead in Elberton officer-involved shooting	YES	27-Oct-16

ELBERT	Deputies: Suspect in custody after man found dead at gas station	YES	16-Mar-17
ELBERT	Woman killed, deputy hurt when patrol car crashes into another car	YES	10-Apr-17
ELBERT	Elbert County Schools cancel classes for total solar eclipse	NO	13-Aug-17
ELBERT	Murder suspect arrested in Upstate extradited back to Georgia	YES	5-Oct-17
ELBERT	Sheriff: 3 in custody after missing elderly man found dead in pond	YES	9-Jan-18
ELBERT	Deputies: 3 arrested in connection with fatal shooting of 86-year-old man	YES	10-Jan-18
ELBERT	GA homeowner finds most wanted Anderson County suspect hiding on property	YES	25-Jan-18
ELBERT	Police: Teen charged with making terrorist threats about shooting up Elbert Co. High School	YES	15-Mar-18
ELBERT	Coroner: Investigation underway after missing man found in Elbert County	YES	2-May-18
ELBERT	Train collides with pickup truck in Elberton	YES	21-May-18
ELBERT	Elberton Police working to identify bank robbery suspect	YES	26-Jun-18
ELBERT	GBI: Missing teen's body, car found in pond in Elbert County	YES	18-Jul-18
ELBERT	GA students head back to the classroom this week	YES	30-Jul-18
FRANKLIN	Deputies: Lavonia man arrested on carjacking charges	NO	8-Sep-16
FRANKLIN	Store managers, workers react to Lavonia police shootings	YES	13-Dec-16
FRANKLIN	Watch: Lavonia police officer discharged from hospital after shooting	YES	20-Dec-16
FRANKLIN	Business sells decals, t-shirts in support of Lavonia officers shot in the line of duty	YES	21-Dec-16
FRANKLIN	Heavy traffic on I-85 in Franklin County after truck catches fire, one lane blocked	NO	26-Dec-16
FRANKLIN	Man accused of shooting two Lavonia officers due in court Wednesday	YES	4-Jan-17
FRANKLIN	Lavonia police department to honor wounded officers	YES	12-Jan-17
FRANKLIN	Lavonia officers: He took a bullet for me, He's my brother.	YES	18-Jan-17
FRANKLIN	Deputies: YouTuber behind popular gun videos arrested on drug charges in Franklin County	NO	28-Aug-17
FRANKLIN	Lavonia Police searching for suspect after robbery at Dollar General	NO	3-Sep-17
FRANKLIN	New GBI initiative aims to slow down opioid crisis	YES	16-Nov-17
FRANKLIN	GBI: Foul play suspected after 2 found dead in Franklin Co.	YES	22-Nov-17
FRANKLIN	Police seek suspect who passed teller note saying "gun now" during Franklin Co. bank robbery	YES	12-Jan-18
FRANKLIN	Video shows liquor store clerk attacked by robbery suspect in motorcycle helmet	YES	29-Jan-18
FRANKLIN	Lavonia police searching for "armed, dangerous" robbery suspect	YES	30-Jan-18
FRANKLIN	Lavonia PD police lieutenant dies unexpectedly	YES	9-Feb-18
FRANKLIN	Police seek suspect who passed teller note saying "gun now"	YES	9-Feb-18
FRANKLIN	Greenville man sentenced to 100 years in shooting of two Georgia officers	YES	9-Mar-18
FRANKLIN	Sheriff: After nearly a week on the run, "dangerous" suspect captured in Franklin County	YES	14-Mar-18
FRANKLIN	Fire officials investigating suspicious weekend fire at old Georgia schoolhouse	YES	14-Mar-18
FRANKLIN	NASCAR issues statement after former driver James Hylton, son killed in crash	YES	28-Apr-18
FRANKLIN	GBI: 11-year-old hid while gunman shot 3 with shotgun Franklin Co. home	YES	14-May-18
FRANKLIN	Deadly deputy-involved shooting under investigation in Carnesville	YES	14-May-18
FRANKLIN	2.4 magnitude earthquake in Franklin County, per preliminary report	NO	30-May-18
FRANKLIN	GBI: Investigation ongoing after body recovered from creek in Royston	YES	11-Jun-18
FRANKLIN	Lavonia's first Chick-Fil-A is now open!	NO	12-Jul

ATTACHMENT 3

**SCREENSHOTS OF WHNS STORIES COVERING
STEPHENS, ELBERT, FRANKLIN, AND HART COUNTIES (NEWS, ELECTION, AND
WEATHER COVERAGE)**

**WHNS-TV, FOX CAROLINA NEWS
SCREENSHOT FROM
WEATHER ADVISORY/WARNING BUG –
STEPHENS COUNTY**



Winter Weather Advisory
Stephens



CHURCH
CLOSINGS

FAIRVIEW BAPTIST CHURCH GREER
NO EVENING SERVICES

5:25 28°

**WHNS-TV, FOX CAROLINA NEWS
SCREENSHOT FROM
SCHOOL CLOSINGS TICKER –
STEPHENS COUNTY**



TROPICS TRACKER



IRMA

Category: 2

Location: 27.3°N, 81.9°W

Wind: 105 mph

Gusts: 130 mph

Movement: N at 14 mph



KENDRA KENT

NWA/ ams


CHIEF METEOROLOGIST

FOX CAROLINA
SCHOOL CLOSINGS

STEPHENS COUNTY SCHOOLS
CLOSED

10:01 64°

2017-09-10 22:01:58.25





**WHNS-TV, FOX CAROLINA NEWS
COVERAGE SCREENSHOTS FROM
STEPHENS COUNTY**

Areal Flood Warning
Stephens



TOCCOA, GA

2018-05-16 16:30:10.29



Flash Flood Watch
Northern Jackson

WITH A FEW PICTURES TAKEN- IN
THE AFTERMATH OF NATE - THESE
ARE OUT OF TOCCOA GEORGIA

2017-10-08 22:21:20.19



Severe T-Storm Warning
Rabun

92

POLICE

NEW @ 5

GBI ASSISTING IN SHOOTING INVESTIGATION

TOCCOA

FOX
CAROLINA
5:47 81°

LIVE

ONLY ON FOX

BROOKLEY CROMER

TOCCOA

FOX
CAROLINA
11:06 72°

LIVE

Severe T-Storm Warning
Laurens

HOMECOMING FOR FALLEN SOLDIER

TOCCOA, GA

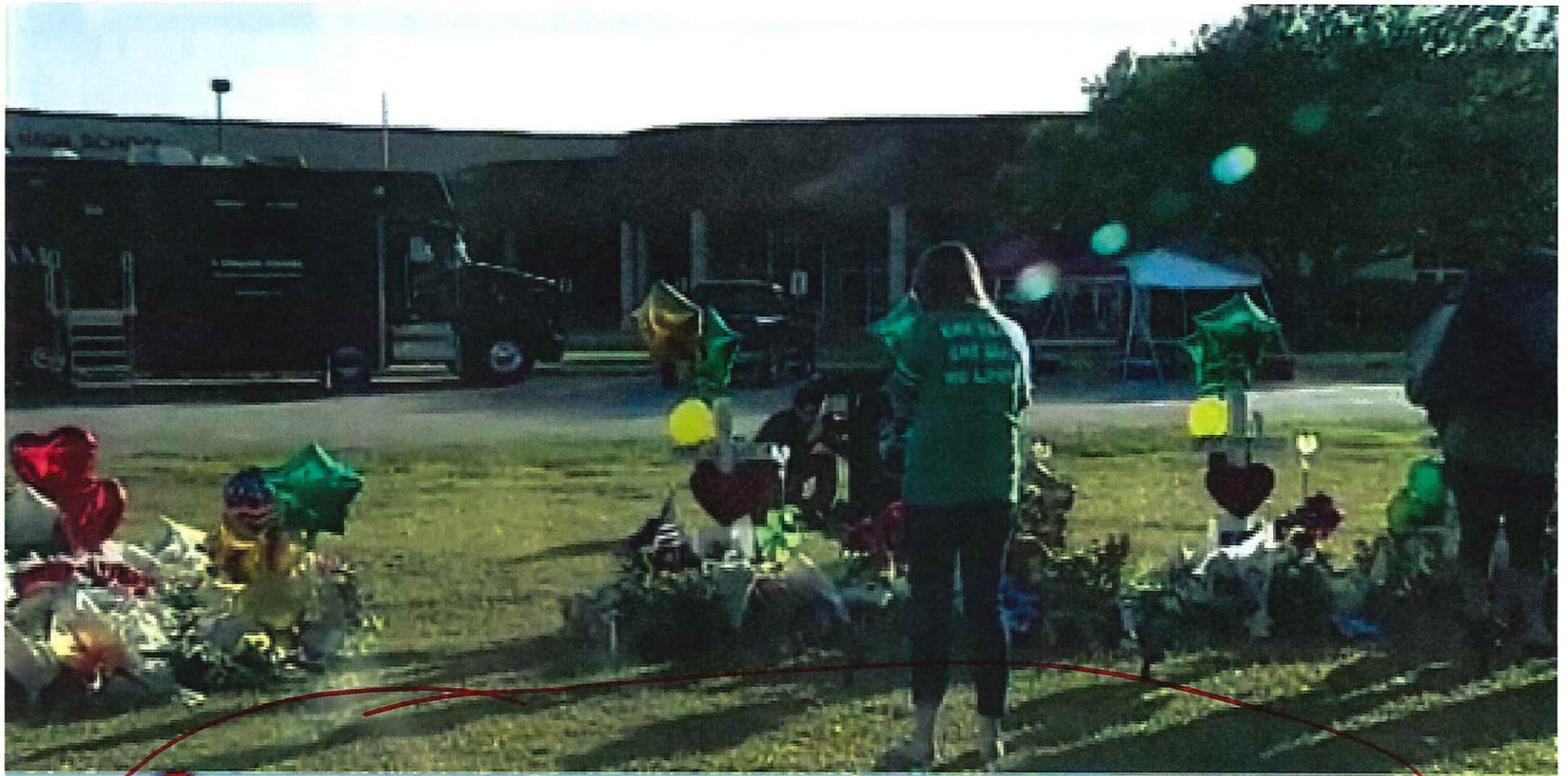
FOX
CAROLINA
5:12 86°



LATER TODAY

REMAINS OF SOLDIER TO BE RETURNED FOR BURIAL

TOCCOA



**You
Decide
2018**

STEPHENS COUNTY
SUNDAY ALCOHOL
SALES REFERENDUM

YES

1,573

50%

NO

1,562

50%

PRECINCTS
REPORTING

100%



**You
Decide
2016**

STEPHENS COUNTY
COMMISSIONER, POST
4

✓ JAMES ADDISON
BRYAN DOOLEY

1,039 40%
755 29%

PRECINCTS
REPORTING **100%**



6:00 PM WEDNESDAY





8:00 PM WEDNESDAY

RAIN HAIL SNOW

