

# **Exhibit 16**

## Declaration of Scott Livingston

I, Scott Livingston hereby declare as follows:

1. I am currently employed by Chesapeake Television, Inc. d/b/a as WBFF-TV ("Chesapeake"), an indirect, wholly-owned subsidiary of Sinclair Broadcast Group, Inc., as news director for WBFF-TV's news programming, as well as for the news programming which Chesapeake provides to WNUV-TV pursuant to a Programming Services Agreement with the licensee of WNUV-TV (the "Licensee").

2. I have a Bachelor of Arts degree in communications from Salisbury State College and have been employed in the television news business for over 20 years. I was promoted into my current position on October 1, 2002. Before that, I was acting news director for ten months and assistant news director for six years.

3. As news director, I am primarily responsible for the day-to-day decisions as to the content which appears on the news programming broadcast on WBFF-TV and, subject to the ultimate control of the Licensee, WNUV-TV. In making such decisions, I, together with other members of my production staff, consider the interest of each station's viewers, as well as the ability to increase viewership ratings for the programs.

4. The demographic make-up of the audience for the 6:30 p.m. news which is broadcast on WNUV-TV is younger and includes a materially larger percentage of minorities, women and Baltimore city residents than the audience for the news programming broadcast on WBFF-TV.

5. My performance and the success of the news programming are measured in large part by the audience ratings delivered by WBFF-TV's and WNUV-TV's news programming. Accordingly, I believe it is critical that the news programming cover stories that affect the lives of each station's viewers.

6. Set forth below is a representative sample of the types of stories that aired (during the past 90 days) only on newscasts broadcast by WNUV-TV or were given much more extensive coverage on WNUV-TV, as compared to WBFF-TV (including as part of WNUV News at 6:30's unique "Newsmaker" segment, a three-to-four minute question and answer segment focusing on issues of particular interest to residents of Baltimore City).

(a) Question P, a ballot question that called for a reduction in the size of the Baltimore City Council. Coverage included three stories that were in the WNUV-TV news' first block leading up to election day, as well as two, three-minute Newsmaker segments with live guests on the topic.

(b) Baltimore City State's Attorney Race - Coverage included several first block packages on the race and the candidates. Also, all three candidates came in for a four-minute Newsmaker segment.

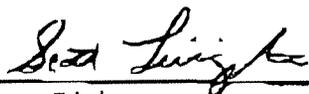
(c) Baltimore BELIEVE campaign, a public relations campaign by the City of Baltimore on the importance of citizens helping police and government clean up the city. WNUV-TV's news coverage included multiple stories, three Newsmaker segments (3:30 minutes each) on the campaign and its effectiveness.

(d) One on One with the Mayor - Baltimore City Mayor, Martin O'Malley, is a regular guest on WB 54 News at 6:30 where the Station focuses on city issues and topics affecting the lives of city residents.

(e) African American Museum - Baltimore City is breaking ground on a museum of African American History. WNUV-TV News at 6:30 has done several stories including the ground breaking. Coverage has also included two Newsmaker segments (3:00 minutes each) on the museum.

(f) City Health Commissioner - Once a month, Baltimore City Health Inspector, Dr. Peter Beilenson, appears on WNUV-TV's Newsmaker segment (approximately 3:00 minutes in length) to talk about health issues affecting the Baltimore city population. Topics have included blood pressure in African Americans, shots for school children, breast cancer awareness and free flu clinics.

Executed under penalty of perjury this 30th day of December 2002.

  
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Scott Livingston