

EXHIBIT D
TO CROWTHER DECLARATION
IN SUPPORT OF ONE 3 TWO, INC.'S
MOTION IN LIMINE NO. 2
PART III OF IV

III. OPINIONS REGARDING THE JAROSZ REPORT

A. The Associated Press' Purpose In Creating The Photograph Of Barack Obama At Issue In This Case

110. In his report, Mr. Jarosz states that The Associated Press' purpose in making the Obama Photo was "to capture a newsworthy event."⁶⁷

111. I disagree with Mr. Jarosz. In my opinion, The Associated Press's primary purpose in making the Obama Photo was to create a high-quality, stand-alone portrait of then-Senator Obama that could be licensed for many purposes by AP Images customers.

112. In reaching my conclusion, I relied on (1) my own knowledge of the industry, (2) my understanding of The Associated Press' business, in particular its AP Images business unit, (3) the stated objective of the AP Images business plan to leverage its photography operations in creating licensable content for The Associated Press' image archive, and (4) Associated Press staff photographer Mannie Garcia's deposition testimony.

113. As I noted above in paragraphs 82 to 100, a photo agency makes its money by licensing photographs. The agencies that I have worked for in my career have all sought to create or obtain as many photographs as possible, covering diverse subject matter, in order to have more material to license and thus maximize their licensing revenue.

114. The 2003 AP Images business plan noted this same objective, and David Ake of The Associated Press testified that Associated Press photographers are specifically instructed to do more than simply report on the specific news of the day. Rather, they are directed to look around them for opportunities to make images that would be useful for the archive, beyond those relating directly to the story they are assigned to cover.

115. Not surprisingly, Associated Press staff photographer Mannie Garcia, who created the Obama Photo, also confirmed this purpose. Mr. Garcia testified that he was instructed to go beyond just reporting on the news, and to look for opportunities to create material for the archive. Mr. Garcia also testified that he wanted to do more than just document George Clooney's Darfur press conference -- he wanted to make a portrait of

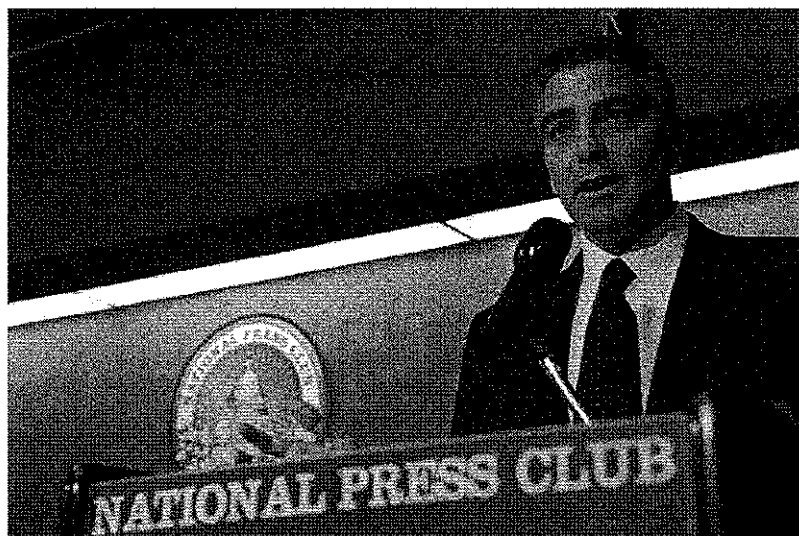
⁶⁷ Expert Report of John C. Jarosz (Oct. 1, 2010) ¶58.

then-Senator Obama that he knew would be included in the AP Images archive and used for future licensing.⁶⁸

116. In fact, Mr. Garcia stated that he had made a “classic” political portrait of then-Senator Obama.⁶⁹

117. It is clear to me, in looking at the Obama Photo, that the photograph’s primary purpose was to be a stand-alone image of then-Senator Obama, as opposed to documenting George Clooney’s Darfur press conference.

118. As a photographer, if I were assigned to cover a press conference about well-known actor George Clooney’s trip to Darfur, the photographs that I would make to report on that story would focus on Mr. Clooney speaking at a podium or sitting at table with the other panelists, discussing the trip. Mr. Garcia did in fact make such photos, including the photograph shown below:



119. The Obama Photo, however, is very different. It does not depict Mr. Clooney at all. Indeed, there is nothing about the photo that ties it to that particular press conference. Rather, the Obama Photo serves as a stand-alone portrait of then-Senator Obama, capturing him in a flattering, statesman-like manner. It was well-suited for use when an

⁶⁸ M. Garcia (Mar. 4, 2010) Tr. at 31:11-15, 34:5-9, 35:12-16, 49:8-50:1.

⁶⁹ M. Garcia (Mar. 5, 2010) Tr. at 220:9-16.

image of then-Senator Obama was needed, regardless of what the accompanying story -- if any -- was about.⁷⁰

120. My opinion is further supported by the fact that long before Mr. Fairey used the Obama Photo to make the Obama Works, it had been repeatedly used by The Associated Press to accompany stories featuring then-Senator Obama that had nothing to do with Mr. Clooney or the Darfur press conference.

121. For example, on June 2, 2006, the Obama Photo was used to illustrate a story about "dueling political gatherings in Ohio" and the potential significance of African-American voters in the 2008 election.⁷¹ Similarly, on August 17, 2006, the Obama Photo was used to illustrate a story about Obama's trip to Africa.⁷²

122. Thus, as noted above, I believe that Mr. Jarosz was wrong and that The Associated Press' main purpose in making the Obama Photo was to create a portrait of then-Senator Obama that could be licensed to a variety of customers for a variety of uses.

⁷⁰ In determining that the purpose of the Obama Photo was more than simply news coverage, I also considered that the "news" of that day was George Clooney's appearance at the National Press Club to discuss humanitarian effort in Darfur, and not the appearance of then-Senator Barack Obama at the same event. During the 478 days that Barack Obama had served as a U.S. Senator prior to his appearance at the National Press Club with Mr. Clooney on April 27, 2006, Obama did not attract significant media attention, at least not as measured by the number of photographs that were available of him. For example, a search of The Associated Press' AP Images archive between the period January 4, 2005 and April 26, 2006 located only 32 pictures featuring Barack Obama. This is not surprising given that, prior to Mr. Obama's address at the 2004 Democratic National Convention in Boston, he was unknown in national politics and had not been covered by the national media to any discernable degree. During this same period, a search of the Associated Press' AP Images archive for Mr. Clooney reveals 370 images, 11.5 times as many as for Mr. Obama. In short, Barack Obama was not a national celebrity during this period. The National Press Club event was a celebrity event, featuring a major movie star, which is a rare occurrence in Washington, D.C. "We don't get that many movie stars here, so it was kind of a big deal," said Mr. Garcia of the event. See M. Garcia (Mar. 4, 2010) Tr. at 29:25-30:2. Nor was Mr. Clooney just any celebrity -- he is at or near the top of A-List movie stars. For example, in 2006, the year the Darfur press conference took place, Mr. Clooney topped People Magazine's "Sexiest Man Alive" list. At the 78th Annual Academy Awards held on March 5, 2006, just a month before the press conference, Mr. Clooney won an Academy Award for his role in the movie *Syriana*. Nevertheless, at the celebrity event featuring a popular actor who had just won an Academy Award, Mr. Garcia photographed more than just Mr. Clooney, consistent with his training and instructions from The Associated Press. M. Garcia (Mar. 4, 2010) Tr. at 31:16-33:5. In other words, Mr. Garcia made photographs not just to cover the news of the day, but also to add other licensable content to the AP Images archive.

⁷¹ See "Eye on Ohio Black Vote," #060427033729 (AP 0000816-17).

⁷² See "Obama Africa," #060427034297 (AP 0000818-19).

B. The Associated Press' Licensing Practices And The Negotiations It Would Have Entered Into With Shepard Fairey For A License To Use The Obama Photo, Had Mr. Fairey Sought To License Its Use

123. I was asked to give an opinion as to whether the Jarosz Report accurately describes the type of license that The Associated Press would have entered into with Fairey in a hypothetical licensing situation, and what the payments under such a hypothetical license would have been.

124. The following shows the Obama Photo and the image that Fairey created using the Obama Photo:



The Obama Photo

Fairey's Unlicensed Obama Image

1. The Associated Press Would Have Granted An Initial License For A Modest Flat Fee And Then Renegotiated The License When Fairey Expanded The Use Of The Obama Photo Beyond The Scope Of The Initial License

125. In his report, Mr. Jarosz opines that The Associated Press would have agreed to a flat-rate fee topping out at \$3,000 for all uses of the Obama Photo for all time.⁷³

126. He bases this conclusion on his belief that the Obama Works are comparable to the posters and t-shirts using Fairey's "Palestinian Woman" image (shown above in

⁷³ John Jarosz Expert Witness Report, Oct. 1, 2010 (Paragraph 99)

paragraph 53), for which The Associated Press granted a \$977 license to Fairey in December 2008.⁷⁴

127. I strongly disagree with this conclusion. Such a license would have been inconsistent with industry practice and would have made absolutely no business sense.

128. It is my opinion that, as stated in the initial Report of Katherine Kedrowski, dated October 1, 2010, if Mr. Fairey had contacted The Associated Press and requested a license to use the Obama Photo, an Associated Press sales representative would have been assigned to Mr. Fairey's account to negotiate that initial license and also to manage the licensing rights to the Obama Photo going forward.⁷⁵

129. It is also my opinion that after the Obama Image became widely popular and Fairey sought to significantly expand the distribution of that image and the categories of merchandise on which it was used, beyond the scope of the original license, The Associated Press and Fairey would have negotiated a new license for the continued distribution and sale of the Obama Works by Fairey, his companies and licencees, including Obey Clothing, that would have given The Associated Press a better opportunity to share in the commercial success of the Obama Image.

130. My opinion is supported by the testimony of Ms. DeGrave regarding the licensing of AP Images photographs. As discussed above at paragraphs 49 to 54, Ms. DeGrave testified that AP Images sales representatives would negotiate a license to cover a new or expanded use based on the AP Images price guidelines and taking into consideration such

⁷⁴ Expert Report of John C. Jarosz (Oct. 1, 2010) ¶ 100

⁷⁵ I disagree with the assertion in the Jarosz Report that The Associated Press does not have "standard" terms for licensing its images. This statement appears to have been based on the testimony of Ken Dale, The Associated Press' Vice President and Chief Financial Officer, but I believe that Jarosz has misrepresented Mr. Dale's testimony. He also appears to have completely ignored the testimony of Farah DeGrave, Operations Manager for New Media Markets at The Associated Press, who testified about the terms on which The Associated Press licenses its images. Based on Ms. DeGrave's testimony as well as my review of The Associated Press' price guide and my own knowledge of the photo industry, I believe that The Associated Press has a standard framework for licensing its images that still allows its sales representatives the necessary freedom to craft each individual license to meet the particular needs of the customer and the nature of the particular use. For example, Ms. DeGrave testified that the AP Images sales representatives could work with a customer to negotiate an individualized license that would best fit the customer's needs. See F. DeGrave (Mar. 23, 2010) Tr. at 72:15-24.

criteria as the nature of the use, where the image would be used, and how many items would be produced.

131. That Fairey would have sought an additional license also is confirmed by Fairey's own near-contemporaneous actions with regard to the license for the Palestinian Woman image as the scope of that use changed and expanded beyond the terms of the original license.

132. As I explained above, Fairey initially negotiated a license with AP Images for a modest fee based on the original intended use (\$977 for use on 5,000 t-shirts and 500 posters). In other words, that license did not give Fairey an unlimited opportunity to use the image for all time in any manner he wished, but rather was a narrow license to use the image for the defined scope.

133. As the Palestinian Woman image became more popular, and as Fairey sought to expand the use, he came back to The Associated Press to seek a broader license covering the additional uses of the image. (I understand from counsel that those license negotiations are on hold pending the outcome of this lawsuit.)

134. This supports my opinion that, as I explained above, there might be an initial modest license fee, but then future use would have to be separately negotiated.

135. My opinion is also supported by my experience in the industry. As I also describe in paragraphs 129 to 133 above, sometimes a photograph can become particularly popular. When that happens, it is possible for a photo archive to negotiate favorable terms that allow it to take advantage of that popularity. As I discussed above in paragraphs 86 to 98, I have done deals that involved licensing a single photograph for tens of thousands of dollars for various uses. When I was negotiating those deals, I carefully addressed the scope of use, time of use, and a myriad of other variables that were important in the given situation.

136. There is no doubt in my mind that although the initial fee most likely would have been modest and for a limited use, once the Obama Poster had become well known The Associated Press and Fairey would have negotiated a new license that would have provided significantly more compensation for The Associated Press.

2. The New License Would Have Incorporated A Revenue Sharing-Based Royalty

137. Based on my experience in the photo archive industry, including at Getty Images and other archives, and as discussed above at paragraphs 1 to 4 regarding The Associated Press' licensing practices, when a photograph has become extremely popular and is used for merchandising and other purposes, a new license to cover the expanded use would make sense.

138. A photo agency such as AP Images would evaluate Fairey's request for an expanded license to cover items such as t-shirts, sweatshirts, commissioned art works (which Fairey said he intended to sell for as much as \$100,000 each), and realize that, given the image's popularity, there was great potential to make very substantial revenue.

139. The photo archive would want to be fairly compensated for its contribution to the success of the project, which could help the archive finance less lucrative areas of its business. A revenue-sharing arrangement would be the best way of accomplishing this, as it would allow the photo archive to receive an ongoing revenue stream rather than simply receiving a one time only flat license fee while Mr. Fairey and his affiliated companies and licensees continued to reap significant returns.

140. My opinion is also supported by the fact that Mr. Fairey's own company seems to have acknowledged that it is appropriate to share revenue with the copyright owners of the photographs that Mr. Fairey uses for his works. In a June 4, 2008 e-mail to a colleague regarding licensing images, Mrs. Fairey wrote that "*Shepard and myself would always be open to doing a royalty 50/50 split, as long as Shepard did the illustration However, if it is a straight artist collab[oration] where the 'artist' incorporates our branding into their own artwork, then maybe if we did get 5.5% royalty on the clothing, we would do a split of that royalty that is more like 25% Shepard and 75% 'artist.'*"

141. In other words, Fairey seemed to appreciate the debt that was owed the creator of the photograph that was used, and that it would be fair to share the revenue that might result.

142. My opinion is further supported by Ms. DeGrave's testimony that if a potential licensee is planning to use an AP Images photo to create merchandise, such as Fairey's

various poster-runs, sticker-runs, and apparel derived from the Obama Photo, The Associated Press may entertain a revenue-share license, as opposed to a lump-sum-based license.⁷⁶

143. I also believe that, having licensed the Obama Photo and used it to create the Obama Works, Fairey would have had little leverage in the negotiations for the new license.

144. If The Associated Press insisted on a revenue-sharing based license, Fairey's only options would have been to agree to such a license or stop using the Obama Photo, and by extension the Obama Works.

145. In light of the success of the posters, Fairey would not have wanted to change the source image. As I understand from reviewing the expert report of Professor Laurie Dahlberg, the Obama Photo was particularly well-suited to use as an inspirational campaign poster.

C. Aspects Of The Nature And Magnitude Of The Harm To The Associated Press As A Result Of Shepard Fairey's Unlicensed Use Of The Obama Photo

146. I also was asked to consider certain aspects of Mr. Jarosz's opinion that Fairey's unlicensed use of the Obama Photo did not cause any significant harm to The Associated Press.

147. I strongly disagree with this conclusion. For one thing, I have reviewed the expert report of economist Bill Landes who identified a number of lost revenue opportunities to The Associated Press for Mr. Fairey's unlicensed use of the image. In addition to those harms, based on my 30 years of experience in the news and photo licensing business, I believe that The Associated Press was harmed in several additional, material ways.

⁷⁶ F. Degrave (Mar. 23, 2010) Tr. at 116:4-17.

1. The Associated Press Has Suffered, and Continues to Suffer, Harm by Fairey's Public Refusal to License the Photo Suffered As A Result Of Fairey's Public Refusal to License the Obama Photo

148. Based on my experience in the photo industry, I believe that The Associated Press was harmed by not having been identified and associated with the Obama Poster image much earlier in the presidential campaign – indeed, during the primaries.

149. By failing to identify the source photograph for his posters in media interviews⁷⁷ during the height of interest in him and the posters, Fairey was denying an opportunity for The Associated Press and its staff photographer Mannie Garcia to be put into positive light in connection with those posters.

150. Fairey's actions not only denied The Associated Press a very positive marketing opportunity, but also denied it a very positive editorial connection to an ongoing major news story.

151. In my experience, it is very common for photo editors at newspapers, magazines and websites to identify which of their image providers, such as The Associated Press, Reuters, Getty Images, EPA and other competitors, are providing the best coverage of ongoing stories. Editors tend to gravitate towards an individual news source such as The Associated Press when they know that organization to be at the top of the game in covering a specific story.

152. Part of the reason for this gravitation is technical. A news publisher, such as a newspaper, magazine or website, typically subscribes to a number of competing image providers and has images arriving from those providers into its photo editing systems in a steady stream. For a major story, an editor may have to sort through hundreds of pictures from competing sources. As a shortcut, photo editors may sort images by provider, look at those from the "top" provider first, and only look at other providers' images if the preferred provider does not have an image that suits their needs.

⁷⁷ S. Fairey (Mar. 16, 2010) Tr. at 97:15-20.

153. Similarly, publishers who have to go to the websites of individual image providers to look for pictures to license a-la-carte, must decide in what order to visit the each of the providers' sites, sites such as APImages.com.

154. Photo editors are fully aware that each image provider staffs events differently, with different levels of commitment and with different groups of photographers. For coverage of multiday stories, such as a golf tournament, and particularly for a long duration story such as an election campaign, establishing that your organization is on top of the story results in photo editors looking for your material first.

155. During my experience at Reuters as the onsite photo editor for many major international news and sporting events, I was fully aware, as were my counterparts at competing wire services such as The Associated Press, AFP and others, of the importance of doing well on the first day of an event, knowing that if we failed to do so our customers might not look at our material on subsequent days.

156. In addition to publishers gravitating towards an organization, publishers also gravitate towards individual photographers. Associated Press photographer Mannie Garcia likely would have been in higher demand as a photographer, and his images may have been search for first, had his very positive connection to Fairey's posters been established earlier in the campaign. Additionally, Mr. Garcia would have been in demand by the media for interviews about his photograph and its connection to Fairey's posters.

2. The Associated Press Has Suffered As A Result Of Fairey's Public Statements That He Did Not Need To License The Obama Photo

157. In his report, Mr. Jarosz understates the impact on The Associated Press of the use. At one point, he even states that "I have seen no evidence that Mr. Fairey's use of the . . . Obama Photo precluded any artist from using [that photo] in his or her artistic projects."⁷⁸

158. I believe that Mr. Jarosz did not take into account the real world fact that no one will pay money for something if they think that they can get it for free.

⁷⁸ Expert Report of John C. Jarosz (Oct. 1, 2010) ¶72

159. It is well known that Mr. Fairey did not obtain a license to use the Obama Photo, and that he has made numerous public statements to the effect that no license was necessary. In my opinion, this type of conduct has had, and will continue to have, an adverse effect on The Associated Press. And it would have even a greater effect adverse effect on The Associated Press if others were to similarly use The Associated Press's images without compensation.

160. My opinion is supported by the testimony of Kenneth Dale, Senior Vice President and Chief Financial Office of The Associated Press, who testified, at some length, about the adverse effect of these statements on The AP's licensing negotiations with potential customers.

161. For example, when questioned regarding damages claimed by The Associated Press, Mr. Dale testified,

The impact on the images business as a whole because of Mr. Fairey's public statements indicating one doesn't need a license for this kind of usage has definitely deterred potential customers from coming to us and thinking that they can just take the product for free. And because The Associated Press' entire business model is licensing, 95 percent of our revenue comes from licensing content, whether that be images or video or text or multimedia graphics, whatever we produce, including software, if people think that they can take that for free without paying, it has a significant consequence to our overall business.⁷⁹

162. Mr. Dale also testified that others at The Associated Press who are involved in The Associated Press's licensing business "indicated that customers have told them as a result [of Mr. Fairey's lawsuit], they have had some doubts as to whether or not they need to license products from [The AP] for what they were intended to use them for."⁷⁹

163. Although Mr. Jarosz lists Mr. Dale's deposition testimony among the materials he considered in preparing his report, he does not even attempt in his report to address or rebut Mr. Dale's testimony noted above in paragraph 162.

⁷⁹ K. Dale (Mar. 26, 2010) Tr. at 14:5-16:6.

⁷⁹ K. Dale (Mar. 26, 2010) Tr. at 45:13-46:25.

164. My opinion is also supported by my years of experience in the industry. Photo agency businesses such as AP Images and Getty Images are virtually entirely dependent on licensing fees. If people believed that they could use images for free, they obviously would prefer to do that rather than fairly compensating the creator of the content for their use of that content.

165. This is supported by the proliferation of illegal downloads of content from the Internet.

166. A 2010 report by Reuters found that illegal downloading has a huge economic impact beyond just loss of revenue, and could put more than one million people out of work by 2015.⁸⁰

167. The Reuters report states: *"The bulk of illegal downloading targets music, television and video sites, with consumers using 'peer-to-peer' formats to download songs and video clips onto their laptops and home computers from websites without paying a fee. In that respect it has a disproportionate impact on creative industries, with musicians, actors and artists standing to lose the most from unfettered downloading, experts say."*

168. This has been a major issue at all of the companies where I have worked. The sentiment of at least a large group of consumers seems to be that taking someone else's content without compensation (or usually even credit) is perfectly fine and is not akin to stealing. They do not seem to believe that the use of someone else's property without appropriate compensation is wrong.

169. Thus, I have been involved with various projects attempting to combat this throughout my career. A key aspect of every such project was an intensive focus on developing schemes to prevent illegal downloading, including masking images by placing watermarks on them and digitally marking images to allow for online tracking, among other protective steps.

⁸⁰ Reuters.com (http://in.reuters.com/article/idINIndia-47001620100317?feedType=RSS&feedName=technologyNews&utm_source=feedburner&utm_medium=feed&utm_campaign=Feed%253A+reuters%252FINtechnologyNews+%2528News+%252F+IN+%252F+Technology+News%2529).

170. A routine part of my job running the photo agencies SIPA Press and World Picture Network was protecting the copyright of our photographers' images, including sending notices asking for or ordering the removal of images. In one instance the violator was a young photo editor at one of our clients who was using her company's account to download dozens of images and then post them on various sites she controlled. The illegal usage had been noticed by our photographer stationed in Baghdad, Scott Nelson. At that time, during the height of violence in Baghdad, Scott was risking his life every day to make pictures telling the story of the ongoing situation there.

171. By using the Obama Photo without paying any license fee at all for such use, or even crediting The AP until he was forced to do so, Fairey undermined the ability of The Associated Press to generate revenue from the licensing of its photographic content.

172. If others acted like Mr. Fairey, even more opportunities would be lost and ultimately it would threaten the ability of The Associated Press and others like it to continue funding the creation of photographic images.

173. Indeed, in light of the serious financial difficulties facing the news industry today, which I discuss above in paragraphs 11 to 20, permitting consumers to think that they can freely use The Associated Press' content without a license would be particularly harmful to The Associated Press and its member newspapers, whose assessments support its news gathering operations.

SUPPLEMENT 1

Resume

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Media Consultant

July 2008 – Present

Evaluate current business practices and structures of media companies in order to help deliver better business results. Specializing in establishing new revenue opportunities for media companies with an emphasis on the business of image licensing.

Director Business Development – Getty Images, New York

July 2006 – July 2008

Identify and build new business opportunities with emphasis on growing the editorial division through acquisition and strategic partnership. Evaluate existing and emerging photographic competitors and technologies for appropriate partnership options. Spearheaded the development of business strategies for the editorial video, music and multimedia divisions within the company.

Editorial Director – World Picture News, New York

January 2006 – July 2006

Senior executive in charge of the company, reporting to the owner. Responsible for business strategy and content. Oversee a staff of 28 editors, sales reps and supporting staff as well as more than 500 staff, contract and freelance photographers in global coverage. Directed initiatives in a highly technology driven environment including breakthrough technologies such as mobile content, multimedia, audio and video. Strategize and oversee all client and business partner relationships.

Project Implementation – Getty Images, New York

December 2003 – December 2005

Worked as a consultant within Getty Images' global editorial environment designing workflows and integration with key business units as part of the company's implementation of new technologies. Coordinated with editorial management and staff in developing mission critical workflows and internal communications processes.

Director – SIPA Press, New York

January 2001 – May 2002

Senior executive in charge of the USA division of the company. Was responsible for rebuilding the American operations, restoring and motivating the staff, implementing modern technologies, developing an online picture archive, designing and building SIPA New York's website. Directed the staff in coverage of events throughout the world. Oversaw the sales manager and sales staff.

Senior Photographer, Editor – Reuters, Washington

July 1996 – May 1999

Performed as the primary on-site editor-in-charge of content and staff for Reuters Newspictures, directing coverage of high-profile news, sports and entertainment events around the world. Served as White House photographer during the Clinton administration; covered hundreds of major news, sports and entertainment stories including numerous Olympic Games, Academy Awards, major sporting events. Helped pioneer the use of digital photography starting in 1992 as well as transmission of photographs and other cutting edge technologies.

Photographer, Regional Manager, Editor – Reuters, San Francisco

June 1988 – July 1996

Worked as on-site editor of many major stories in North America and covered many major events around the world, with overall responsibility for staff direction and picture report content. Organized, managed and ran the West Coast photo staff.

Photographer, Photo Bureau Manager – United Press International, Seattle

May 1983 – June 1988

Responsible for organizing a coverage network across a four-state area, including the hiring and maintenance of photographers, managing regional budgets and coordination of all news, sports and feature assignments. Performed key functions in coverage of most major national stories during this period.

Photographer, Project Editor – Pasadena (Calif.) Star-News

November 1977 – September 1982

Covered news, feature, sports assignments for a Knight-Ridder metropolitan area daily newspaper with the demands of multiple morning and evening editions. Recognized with a number of photography awards. Designed and edited special sections and photo projects.

University of Southern California, Bachelor of Arts Degree in Journalism

Received a Bachelor of Arts degree in journalism. Took a broad range of journalism studies, including news and feature writing, investigative reporting, television news writing and production, media law, media ethics.