

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the matter of: Letter of Inquiry,)	File No.: 0000115702
Marion Education Exchange & WWGH-LP)	LOI: 1800B3-HOD
)	

RESPONSE OF SPENCER PHELPS

Pursuant to the letter of interest (LOI) sent by the FCC to Marion Education Exchange (MEE) on February 26, 2021, I submit this official response to the reply sent by MEE to the FCC on March 10, 2021 (herein referred to as the 3/10/21 Reply).

MEE HAS FAILED TO FULLY RESPOND TO THE LOI – TWICE

Despite two full attempts, MEE still has not fully responded to the requests made in LOI 1800B3-HOD.

The LOI states that MEE must provide accurate dates for all board members. *“For each of these individuals, MEE must also state the position or positions the person held, and the dates on which the person held those positions.”* [Exhibit 1, Pg. 1] Other than narrative references to certain individuals, nowhere in the 3/10/21 Reply is this information presented clearly. It is unfortunate that some members suffered from health problems that prevented them from serving in their full capacity. However, that does not change nor forgive the fact that names and specific dates are missing.

Application BALL-20190509AAH sent to the FCC on May 9, 2019 by Marion Midget Football (MMF) and MEE states: *“there are no changes in the board members, only the name of the licensee.”* [Exhibit 2] However, the names of Tammy Brammer and Scott Spears do not appear anywhere on this document or in the 3/10/21 Reply. As of May 9, 2019, Tammy Brammer and Scott Spears were vice president and president of MMF respectively [Exhibit 3, Pg. 11-12]. If the FCC application from May 9, 2019 is to be believed, then these names should have been included. If Tammy Brammer and Scott Spears decided not

to join the board of MEE, which is fine, then the board members did change, rendering the statement on the FCC application knowingly false.

What happened to MEE board member Betty Compton after May 9, 2019? That name is never referenced again after appearing on FCC application BALL-20190509AAH [Exhibit 2]. Note the statement made by Shawn Craft in the 3/10/21 Reply: *“All of the board members listed on May 9th were in favor of the transfer... These board members were Patsy Worcester, Martha Douce Maniaci, Mary Ann Stolarzyk, & Margaret Hazalett.”* [Exhibit 4, Pg. 1] No mention of Betty Compton, her dates of service, etc. No mention of Shawn Craft, Linda Sims, Glenn Coble, and Terry Tackett also being board members at this time even though they originally founded MEE on April 29, 2019 [Exhibit 4, Pg. 6-7].

LOI 1800B3-HOD also required *“Copies of all corporate materials (including those filed with the State of Ohio) that are related to or include information regarding MEE’s Board composition...”* The only files given were those that were filed with the State of Ohio. MEE provided neither meeting minutes nor any other documentation. Shawn Craft has signed under penalty of perjury that there are no more documents relating to these board changes – no records were kept, no meeting minutes [Exhibit 4, Pg. 3]. If that’s true, then MEE has violated Ohio Revised Code 1702.15 governing non-profit corporations, which states: *“Each corporation shall keep correct and complete books and records of account, together with minutes of the proceedings of its incorporators, members, directors, and committees of the directors or members.”* [Exhibit 5]

TIMELINE OF EVENTS

On April 29, 2019, Shawn Craft, Linda Sims, Glenn Coble, and Terry Tackett presented documents of incorporation to The State of Ohio to create the incorporated non-profit entity known as Marion Education Exchange [Exhibit 4, Pg. 4-9]. The incorporation documents listed the members of the board to

be the four individuals named above. Those documents constitute the only correspondence MEE has ever sent to The State of Ohio other than a trade name request for “WWGH” on May 21, 2019.

On May 9, 2019, Patsy Worcester, claiming to be president of MMF (Scott Spears was actually president), presented the FCC with an application to transfer the license for WWGH-LP radio broadcasting on 107.1 FM in Marion, Ohio to MEE [Exhibit 2]. This application states that the license for WWGH-LP radio was voted to be “relinquished” on April 28, 2019. However, the licensee did not relinquish the license. The licensee transferred the license, even though members of MMF signed an agreement with the State of Ohio in lieu of civil prosecution to relinquish it to the FCC [Exhibit 3, Pg. 4].

The application also makes declarations regarding the makeup of the board of MEE. These claims are so specific that it’s hard to believe they were made by accident. It states: *“there are no changes in the board members, only the name of the licensee.”* It proceeds to list the only board members of MEE including their voting rights powers represented in percentages, which add up to 100%. These are the only names listed in the application:

- Patti Worcester – voting rights 20%
- Martha Maniaci – voting rights 20%
- Mary Ann Stolarczyk – voting rights 20%
- Betty Compton – voting rights 20%
- Marge Hazalett – voting rights 20%

MEE made no mention of Shawn Craft, Linda Sims, Glenn Coble, or Terry Tackett being other board members despite Shawn Craft’s claims to the contrary in both the 3/10/21 Reply and the February 17, 2021 reply. Shawn Craft provides no documentation to support this change of officers.

At this time, MMF was under investigation by the charitable arm of the AG of the State of Ohio. The investigation started some time in 2018 (the exact start date is unknown since the State of Ohio does not share those details publicly), and all parties involved were aware of this fact. After the investigation, an agreement was signed in lieu of prosecution where Patsy Worcester and Scott Spears would resign from

MMF, Scott Spears had to pay \$12,500.00 in restitution to MMF, neither of them could serve on the board of a non-profit again (Patsy Worcester for 5 years and Scott Spears for life), and the license had to be relinquished to the FCC specifically [Exhibit 3]. Patsy Worcester signed the agreement on May 23, 2019, and Scott Spears signed it on May 21, 2019. Instead of abiding by the agreement, Patsy Worcester, Scott Spears, et al. transferred the license to MEE while omitting all of this information from FCC applications. This omission is very similar to the illegal act of hiding assets before filing for divorce or bankruptcy and demonstrates the willingness of these individuals to break official agreements with governmental bodies.

On May 28, 2019, MEE sent an updated application to the FCC to inform them of a singular personnel change with the board: BTCL-20190528AAN [Exhibit 6]. It stated, “*Patti Worcester has decided to retire and voluntarily transfers her position to Shawn Craft and the paperwork is filed.*” According to this document, Patsy Worcester was the president of MEE as of May 28, 2019. It is unclear what paperwork they are referring to as no other paperwork was filed with any other governing body regarding this change. There was no mention of Linda Sims, Terry Tackett, or Glenn Coble with this application. No meeting minutes were provided. So as of May 28, 2019, according to the documents held by the FCC, the board of MEE consisted of:

- Shawn Craft (president)
- Martha Maniaci
- Mary Ann Stolarczyk
- Betty Compton
- Marge Hazalett

MEE sent no further board-related communication to the State of Ohio or the FCC thereafter until my complaint came to their attention in 2021.

On February 17, 2021, MEE sent a response to the informal objection filed by Spencer Phelps [Exhibit 7]. Even though the reply did not comply with the format and candor required by the FCC, nor was Spencer Phelps copied on it, it stated that the board members of MEE are as follows:

- Shawn Tackett
- Linda Sims
- Terry Tackett
- Glenn Coble

This response did not include exact dates, just years, for the board members' time of service. No documents or meeting minutes were provided to confirm these claims.

On March 10, 2021, Shawn Craft sent an official reply to the LOI that was sent by the FCC on February 26, 2021 (1800B3-HOD) [Exhibit 4]. In this letter, Shawn Craft omits the founding date of MEE. The letter starts out, "*In 2019...*" but doesn't give an exact date, which is very important to this timeline. According to the documents they sent to The State of Ohio, MEE was officially founded on April 29, 2019 and recognized by The State of Ohio on May 2nd, 2019 [Exhibit 4, Pg. 4-9]. Shawn Craft states that the board became Shawn Craft, Linda Sims, Terry Tackett, and Glenn Coble only on May 29, 2019. However, the document MEE sent to the State of Ohio lists those names as board members a full month prior.

The only explanation Shawn Craft offers for the supposed change in board members on May 29, 2019 is that some members' health faded [Exhibit 4, Pg. 2]. He offers no specifics as to who those people were and when they left. He lists three people with health maladies. According to the timeline, there were at least four people on the board at this time other than Shawn Craft as president (May 28, 2019 FCC application). What happened to the fourth person?

The 3/10/21 Reply also states that Shawn Craft was made president at the meeting on May 29, 2019 [Exhibit 4, Pg. 1] However, the application stating that the position of president had changed from Patsy Worcester to Shawn Craft was sent and received a day earlier – May 28, 2019 [Exhibit 6]

MEE BOARD TIMELINE SUMMARY

Given the statements and documents MEE has sent to the FCC and the State of Ohio, here is the timeline of the composition of the board that they are attempting to present:

- **04/29/19** – MEE founded. Board consists of only Shawn Craft, Linda Sims, Glenn Coble, and Terry Tackett. [Exhibit 4, Pg. 4-9]
- **05/09/19** – MEE tells the FCC (not Ohio) that the board now consists of ONLY Patsy Worcester, Martha Maniaci, MaryAnn Stolarczyk, Betty Compton, and Marge Hazalett. Patsy Worcester is currently president of MEE. These five people hold all of the voting rights of the board. [Exhibit 2]
- **05/28/19** – MEE tells the FCC (not Ohio) that Shawn Craft is president now, not Patsy Worcester. No other changes to board made, so MEE board now consists of: Shawn Craft, Martha Maniaci, MaryAnn Stolarczyk, Betty Compton, and Marge Hazalett. [Exhibit 6]
- **05/29/19** – MEE supposedly holds a meeting, and people without voting rights make the board consist of Shawn Craft, Linda Sims, Glenn Coble, and Terry Tackett again. MEE tells the FCC this (not Ohio) in 2021 only after receiving a complaint. [Exhibit 4, Pg. 1-2]

ADDRESSING CLAIMS MADE BY MEE

MEE, in its response to the LOI, stated: *"When the May 29th board meeting was held all of those concerns were addressed, and that is how the new board was formed."* [Exhibit 4, Pg. 1]

Shawn Craft confusingly states here that the new board was formed on May 29, 2019. This makes no sense since the "new" board was the same board of people who founded the entity in the first place an entire month prior to this meeting. MEE has provided no documents to backup or clarify this claim.

"We thought, and believed these members would continue when the application was applied for and granted in early and mid May of 2019." [Exhibit 4, Pg. 2]

This statement does not address why MEE submitted some names yet omitted others in the application for transfer [Exhibit 2]. MEE did not update the FCC or anyone on the composition of their board. The names of Shawn Craft, Terry Tackett, Glenn Coble, and Linda Sims don't appear anywhere in the FCC application on May 9, 2019 or any documents thereafter (minus Shawn Craft) until they acknowledged receiving this complaint in 2021. No sufficient explanation has been provided by MEE to explain this discrepancy.

"On May 29th, 2019 a meeting was held by Shawn Craft, Linda Sims, Glenn Coble, and Terry Tackett."
[Exhibit 4, Pg. 1]

Shawn Craft states that this May 29 meeting only included four people, all of which had no voting rights according to the document they sent to the FCC on May 9, 2019 [Exhibit 3]. According to the timeline, at least Martha Maniaci, Mary Ann Stolarczyk, Betty Compton, and Marge Hazalett were supposed to be on the board at this point. How was this meeting legally conducted if the 4 remaining people who had 80% of the voting rights did not participate in the meeting? MEE has provided no board meeting minutes. It must be assumed then that there are none. Shawn Craft and MEE also do not address what happened to board members Betty Compton, Tammy Brammer, and Scott Spears.

"If they should be listed as board members... we would be glad to do that." [Exhibit 4, Pg. 2]

Shawn Craft is blatantly offering to alter and/or create official documents to meet whatever requirements the FCC is asking for. These people either were board members or they weren't. There should be meeting minutes and definitive records.

The response made by Shawn Craft on February 17, 2021 made several spurious claims such as: “*we are the last station in Marion, Ohio to provide local news & weather every hour...*” [Exhibit 7]

This statement is not true. The radio stations WMRN-AM, WMRN-FM, and WYNT-FM, all based in the city of Marion, Ohio, all provide local news and weather every hour. The other two LPFM stations in Marion, WDIF-LP and WZMO-LP, provide weather every hour and local programming throughout their broadcast days. While this statement is not directly linked to the board member issue being discussed, it is an example of the lack of character these people possess in that they are willing to make statements that are easily disproven.

CONCLUSION

Due to their disregard for State of Ohio laws regarding the keeping of accurate records, their disregard for agreements signed with the State of Ohio, their unwillingness to properly explain the makeup of their organization after multiple attempts, their malleable attitude towards record keeping, and their constant ad hominem attacks on the petitioner, Marion Education Exchange lacks the proper character and candor necessary to hold a radio license with the FCC.

CERTIFICATE OF SERVICE

I certify that copies of this response were sent today via electronic mail to:

Tom Hutton

Federal Communications Commission

tom.hutton@fcc.gov

Heather Dixon

Federal Communications Commission

heather.dixon@fcc.gov

Shawn Craft

Marion Education Exchange

shawncraft@yahoo.com &

shawndog29@gmail.com



Spencer Phelps

[date] 3/15/21

EXHIBITS – TABLE OF CONTENTS

Exhibit 1	LOI 1800B3-HOD from the FCC, dated 2/26/21
Exhibit 2	FCC application BALL-20190509AAH, dated 5/9/19
Exhibit 3	Agreement between MMF and the State of Ohio, dated 5/23/19
Exhibit 4	Reply to LOI 1800B3-HOD sent by MEE to FCC, dated 3/10/21
Exhibit 5	Ohio Revised Code 1702.15 - http://codes.ohio.gov/orc/1702.15v1
Exhibit 6	FCC application BTCL-20190528AAN, dated 5/28/19
Exhibit 7	Response to LOI by MEE, dated 2/17/21

Exhibit 1

**LOI 1800B3-HOD from the FCC,
dated 2/26/21**



Federal Communications Commission
Washington, D.C. 20554

February 26, 2021

In Reply Refer to: 1800B3-HOD

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Shawn Craft
The Marion Education Exchange
1366 Montego Drive
Marion, OH 43302

In re: **The Marion Education Exchange**
WWGH-LP, Marion, Ohio
Facility ID No. 193826
File No. 0000115702

Letter of Inquiry

Dear Licensee:

This letter concerns a pleading submitted to the Commission by The Marion Education Exchange (MEE)—licensee of WWGH-LP, Marion, Ohio (Station)—on February 16, 2021. Among other things, the pleading appears to respond to a Letter of Inquiry (LOI) that we sent to MEE on December 8, 2020.¹ Accordingly, we have considered whether the pleading provided the information and materials requested in the LOI. As discussed below, while the pleading does include some of the requested information, it does not include all of it. Further, it does not contain any of the documentation requested in the LOI.

We hereby direct MEE to provide the missing information and documentation within fifteen (15) calendar days (*i.e.*, no later than **March 11, 2021**). Specifically, MEE must submit:

- A **narrative statement** identifying all individuals who have served as officers and directors of MEE since it was first incorporated. For each of these individuals, MEE must also state the position or positions the person held, and the dates on which the person held those positions.²
- Copies of all **corporate materials** (including those filed with the State of Ohio) that are related to or include information regarding MEE's Board composition, or the appointment, resignation, or termination of MEE officers or directors. If those materials vary in any respect from the narrative statement or any information previously provided to the Commission by MEE, MEE must explain the basis for the variation.

¹ Letter from Albert Shuldiner, Chief, Audio Division, to Shawn Craft, Marion Education Exchange, File No. 0000115702 (dated Dec. 8, 2020).

² For example, if John Doe was an officer or director of MEE, the narrative statement would list his name and then identify the position that he held and when he held it (*i.e.*, Vice President from January 1, 2019, to December 31, 2020).

- An **affidavit or declaration** made under penalty of perjury, signed and dated by an authorized representative of MEE, with personal knowledge of the information and materials being submitted to the FCC. The affidavit or declaration must verify the truth and accuracy of the information provided to the FCC, and must state that all responsive information within MEE's possession, custody, control or knowledge has been provided to the FCC.³

We also direct MEE to provide additional information related to a statement made in an assignment application filed by it and Marion Midget Football on May 9, 2019.⁴ Based on the information in MEE's February 16, 2021, pleading, it appears that the information provided in that application regarding MEE's Board composition was false. Accordingly, we direct MEE to submit a **narrative statement** explaining what basis it had for including the information.

We remind MEE that its response to the LOI should have been—but was not—served by email on FCC staff (tom.hutton@fcc.gov and heather.dixon@fcc.gov) and Mr. Spencer Phelps (spencer.phelps@yahoo.com). We direct MEE to ensure that any additional responses to the LOI are submitted to the Office of the Secretary, Federal Communications Commission, 45 L Street, NE, Washington, DC 20554, and served by email to Tom Hutton, tom.hutton@fcc.gov, Heather Dixon, heather.dixon@fcc.gov, and Spencer Phelps spencer.phelps@yahoo.com. Because MEE's February 16, 2021, pleading was not served on Mr. Phelps and because we are requesting additional information related to the LOI, we conclude that Mr. Phelps shall have fifteen (15) calendar days from the date he is served by email with MEE's response to this letter.

Finally, please note that failure by MEE to respond (or failure to fully respond) within the time period specified may result in the dismissal of its application to renew the Station's license pursuant to Section 73.3568 of the Rules.⁵ In addition, failure to respond (or failure to fully respond or failure to timely respond) to this request for information also may subject MEE to financial penalties.⁶

Sincerely,

Albert Shuldiner

Albert Shuldiner
Chief, Audio Division
Media Bureau

cc: Spencer Phelps, by email to spencer.phelps@yahoo.com

³ Additional affidavits and declarations may be required if the authorized representative of MEE is relying on the personal knowledge of another individual, rather than his or her own knowledge. This is explained in greater detail in the LOI.

⁴ File No. BALL-20190509AAH.

⁵ 47 CFR § 73.3568.

⁶ See 47 CFR § 1.80 (specifying a base forfeiture of \$4,000 for failure to respond to Commission communications).

Exhibit 2

**FCC application BALL-20190509AAH,
dated 5/9/19**

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0009 (June 2010)	FOR FCC USE ONLY
FCC 316		
APPLICATION FOR CONSENT TO ASSIGN BROADCAST STATION CONSTRUCTION PERMIT OR LICENSE OR TO TRANSFER CONTROL OF ENTITY HOLDING BROADCAST STATION CONSTRUCTION PERMIT OR LICENSE		FOR COMMISSION USE ONLY FILE NO. BALL - 20190509AAH
Read INSTRUCTIONS Before Filling Out Form		

Section I - General Information

1.	Legal Name of the Licensee/Permittee MARION MIDGET FOOTBALL		
	Mailing Address 846 UNDERWOOD AVE		
	City MARION	State or Country (if foreign address) OH	Zip Code 43302 -
	Telephone Number (include area code) 7402231167	E-Mail Address (if available) OSUKID2006@AOL.COM	
	FCC Registration Number: 0023109846	Call Sign WWGH-LP	Facility ID Number 193826
2.	Contact Representative (if other than licensee/permittee) SCOTT SPEARS		Firm or Company Name MARION MIDGET FOOTBALL
	Mailing Address 386 BARBARA LANE SCOTT SPEARS		
	City MARION	State or Country (if foreign address) OH	ZIP Code 43302 -
	Telephone Number (include area code) 7407514038		E-Mail Address (if available) OSUKID2006@AOL.COM
3.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input checked="" type="radio"/> Noncommercial Educational Licensee/Permittee <input type="radio"/> Other <input type="radio"/> N/A (Fee Required)		
4.	a. <input checked="" type="radio"/> Voluntary Assignment or Transfer of Control <input type="radio"/> Involuntary Assignment or Transfer of Control <input checked="" type="radio"/> Amendment to pending application File number of pending application: - If an amendment, submit as an Exhibit a listing, by Section and Question Number, of the portions of the pending application that are being revised. [Exhibit 1] b. Applicant certifies that the use of FCC Form 316 is appropriate for this transaction. <input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 2]		
5.	Were any of the authorizations that are the subject of this application obtained through the Commission's competitive bidding procedures (see 47 C.F.R. Sections 1.2111(a) and 73.5000)? If yes, list pertinent authorizations in an Exhibit.		<input type="radio"/> Yes <input checked="" type="radio"/> No [Exhibit 3]

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Assignor/Transferor

1.	Certification. Assignor/Transferor certifies that it has answered each question in this application based on its review	<input checked="" type="radio"/> Yes <input type="radio"/> No
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of the application instructions and worksheets. Assignor/Transferor further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.														
2.	Application for (check one):		<input type="radio"/> Consent to Assign Construction Permit	<input type="radio"/> Consent to Transfer Control of Permittee										
			<input type="radio"/> Consent to Assign License	<input type="radio"/> Consent to Transfer Control of Licensee										
	<input checked="" type="radio"/> Amendment to pending application													
3. Legal Name of the Assignor/Transferor MARION MIDGET FOOTBALL Mailing Address 846 UNDERWOOD AVE <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; padding: 5px;">City MARION</td> <td style="width: 40%; padding: 5px;">State or Country (if foreign address) OH</td> <td style="width: 45%; padding: 5px;">Zip Code 43302 -</td> </tr> <tr> <td colspan="2" style="padding: 5px;">Telephone Number (include area code) 7402231167</td> <td style="padding: 5px;">E-Mail Address (if available)</td> </tr> </table>					City MARION	State or Country (if foreign address) OH	Zip Code 43302 -	Telephone Number (include area code) 7402231167		E-Mail Address (if available)				
City MARION	State or Country (if foreign address) OH	Zip Code 43302 -												
Telephone Number (include area code) 7402231167		E-Mail Address (if available)												
4. Contact Representative (if other than Assignor/Transferor) <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="3" style="padding: 5px;">Mailing Address</td> </tr> <tr> <td style="width: 10%; padding: 5px;">City</td> <td style="width: 55%; padding: 5px;">State or Country (if foreign address)</td> <td style="width: 35%; padding: 5px;">Zip Code -</td> </tr> <tr> <td colspan="2" style="padding: 5px;">Telephone Number (include area code)</td> <td style="padding: 5px;">E-Mail Address (if available)</td> </tr> </table>					Mailing Address			City	State or Country (if foreign address)	Zip Code -	Telephone Number (include area code)		E-Mail Address (if available)	
Mailing Address														
City	State or Country (if foreign address)	Zip Code -												
Telephone Number (include area code)		E-Mail Address (if available)												
If more than one Transferor, submit the information requested in Questions 3 and 4 for each transferor. [Exhibit 4]														
5. Authorizations to be Assigned/Transferred. List the authorized stations and construction permits to be assigned/transferred. Provide the Facility Identification Number and the Call Sign, or the Facility Identification Number and the File Number of the Construction Permit, and the location, for each station to be assigned/transferred. Include main stations, FM and/or TV translator stations, LPTV stations, FM and/or TV booster stations. <div style="border: 1px solid black; padding: 5px; margin: 5px 0;">[Enter Station Information]</div> <p>List the authorized stations and construction permits to be assigned/transferred. Provide the Facility Identification Number and the Call Sign, or the Facility Identification Number and the File Number of the Construction Permit, and the location, for each station to be assigned/transferred. Include main stations, FM and/or TV translator stations, LPTV stations,, FM and/or TV booster stations.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; padding: 5px;">Facility ID Number</td> <td style="width: 15%; padding: 5px;">Call Sign</td> <td style="width: 40%; padding: 5px;">or Construction Permit File Number</td> <td style="width: 15%; padding: 5px;">City</td> <td style="width: 15%; padding: 5px;">State</td> </tr> <tr> <td style="padding: 5px;">193826</td> <td style="padding: 5px;">WWGH-LP</td> <td style="padding: 5px;">-</td> <td style="padding: 5px;">MARION</td> <td style="padding: 5px;">OH</td> </tr> </table>					Facility ID Number	Call Sign	or Construction Permit File Number	City	State	193826	WWGH-LP	-	MARION	OH
Facility ID Number	Call Sign	or Construction Permit File Number	City	State										
193826	WWGH-LP	-	MARION	OH										
6. Agreements for Sale/Transfer of Station. a. If the transaction is voluntary, Assignor/Transferor certifies that: i. it has placed in licensee's/permittee's public inspection file(s) and submitted as an exhibit to this item copies of all agreements for the assignment/transfer of the station(s); ii. these documents embody the complete and final understanding between assignor/transferor and assignee/transferee; and iii. these agreements comply fully with the Commission's rules and policies. b. If the transaction is involuntary, the Assignor/Transferor certifies that court orders or other authorizing documents have been issued and that it has placed in the licensee's/permittee's public inspection file(s) and submitted to the Commission copies of such court orders or other authorizing documents. Exhibit Required			<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A <div style="border: 1px solid black; padding: 5px; margin: 5px 0;">[Exhibit 5]</div> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A <div style="border: 1px solid black; padding: 5px; margin: 5px 0;">[Exhibit 6]</div>											
7. Character Issues. Assignor/Transferor certifies that neither licensee/permittee nor any party to the application has or has had any interest in, or connection with: a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or any party to the application; or b. any pending broadcast application in which character issues have been raised.			<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in <div style="border: 1px solid black; padding: 5px; margin: 5px 0;">[Exhibit 7]</div>											
8. Adverse Findings. Assignor/Transferor certifies that, with respect to the assignor/transferor and each party to the			<input checked="" type="radio"/> Yes <input type="radio"/> No											

	application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	See Explanation in [Exhibit 8]
9.	Auction Authorization. Assignor/transferor certifies that more than five years have passed since the issuance of the construction permit for the station being assigned, where that permit was acquired in an auction through the use of a bidding credit or other special measure.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 9]
10.	Anti-Drug Abuse Act Certification. Assignor/Transferor certifies that neither licensee/permittee nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing PATTI WORCESTER	Typed or Printed Title of Person Signing BOARD PRESIDENT
Signature	Date 05/20/2019

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section III - Assignee/Transferee

1.	Certification. Assignee/Transferee certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Assignee/Transferee further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No
2.	Legal Name of the Assignee/Transferee THE MARION EDUCATION EXCHANGE Mailing Address 1366 MONTEGO DR. City MARION State or Country (if foreign address) OH Zip Code 43302 - Telephone Number (include area code) 7402623203 E-Mail Address (if available)	
3.	Contact Representative (if other than Assignee/Transferee) Firm or Company Name Mailing Address City State or Country (if foreign address) Zip Code - Telephone Number (include area code) E-Mail Address (if available)	
If more than one Transferee, submit the information requested in Questions 2 and 3 for each transferee. [Exhibit 10]		
4.	Agreements for Sale/Transfer of Station. Assignee/Transferee certifies that: a. the written agreements in the licensee/permittee's public inspection file embody the complete and final agreement for the sale or transfer of the station(s); and b. these agreements comply fully with the Commission's rules and policies.	<input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 11]
5.	Changes in interests as a result of assignment/transfer. a. [Enter Changes in Interests Information]	

	or [Exhibit 12]	
	b. Applicant certifies that equity interests not set forth above are non-attributable.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A [Exhibit 13]
6.	Other Authorizations. List call signs, locations, and facility identifiers of all other broadcast stations in which assignee/transferee or any party to the application has an attributable interest.	<input checked="" type="checkbox"/> N/A [Exhibit 14]
7.	Acquisition of Control. List the file number and date of grant of FCC Form 301, 314, or 315 application by which the Commission approved the qualifications of the individual or entity with a pre-existing interest in the licensee/permittee that is now acquiring control of the licensee/permittee as a result of the grant of this application.	<input checked="" type="checkbox"/> N/A [Exhibit 15]
8.	Character Issues. Assignee/Transferee certifies that neither assignee/transferee nor any party to the application has or has had any interest in, or connection with: a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or any party to the application; or b. any pending broadcast application in which character issues have been raised.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 16]
9.	Adverse Findings. Assignee/Transferee certifies that, with respect to the assignee/transferee and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 17]
10.	Alien Ownership and Control. Assignee/Transferee certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 18]
11.	Auction Authorization. Assignee/transferee certifies that where less than five years have passed since the issuance of the construction permit and the permit had been acquired in an auction through the use of a bidding credit or other special measure, it would qualify for such credit or other special measure.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 19]
12.	Anti-Drug Abuse Act Certification. Assignee/transferee certifies that neither licensee/permittee nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing PATTI WORCESTER	Typed or Printed Title of Person Signing BOARD PRESIDENT
Signature	Date 05/20/2019

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 5
Description: MIDGET FOOTBAL RELINQUISH LICENCE

AT A MEETING HELD ON SUNDAY APRIL 28TH, 2019 AS VOTED ON BY MARION MIDGET FOOTBALL ON SUNDAY APRIL 28TH 2019, MARION MIDGET FOOTBALL VOTES TO RELINQUISH THE LICENCE TO WWGH-LP RADIO, AND CEASE ANY INVOLVEMENT

THERE IS NO MONETARY CONSIDERATION;

Exhibit 11
Description: CHANGE OF LICENCE

MARION MIDGET FOOTBALL ON SUNDAY APRIL 28TH 2019, VOTED TO RELINQUISH THE LICENCE TO WWGH-LP RADIO, AND CEASE ANY INVOLVEMENT

THE MARION EDUCATION EXCHANGE WILL CONTINUE TO PROVIDE THE SAME EDUCATIONAL PROGRAM SCHEDULE THAT WWGH HAS HAD UNDER MARION MIDGET FOOTBALL

THE APPLICANT IS LOCAL IN COMPLIANCE WITH SECTION 73.853

THE APPLICANTS CAMPUS OR HEADQUARTERS IS WITHIN 10 MILES OF THE PROPOSED TRANSMITTING SITE AND 75% OF ITS BOARD MEMBERS RESIDE WITHIN 10 MILES OF THE TRANSMITTING SITE.

EDUCATIONAL PURPOSE AND OBJECTIVE STATEMENT FOR THE NEW LICENSEE THE MARION EDUCATION EXCHANGE.

THE PURPOSE OF THE MARION EDUCATION EXCHANGE IS TO PROVIDE THE COMMUNITY OF MARION, OHIO WITH EDUCATIONAL INFORMATION OF ALL KINDS. FROM NEWS, TO WEATHER, TO OBITUARIES, TO WEATHER ALERTS, TO LOCAL EVENTS THAT ARE AVAILABLE FOR THE PUBLIC AND TO THE PUBLIC OF MARION OHIO AND OTHER AREAS. THIS WILL BE DONE THROUGH PROGRAMS OF ALL KINDS

WE WILL HAVE PROGRAMS THAT DEAL WITH HISTORY AND HEALTH AND ALL THINGS THAT ARE IN THE PUBLIC INTEREST AND BETTERMENT OF THE COMMUNITIES OVERALL EDUCATION

THE MARION EDUCATION EXCHANGE IS A NOT FOR PROFIT ENTITY ORGANIZED UNDER THE LAWS OF OHIO.

Attachment 11

Exhibit 12
Description: BOARD MEMBERS,

THERE ARE NO CHANGES IN THE BOARD MEMBERS, ONLY THE NAME OF THE LICENSEE,

PATTI WORCESTER
PRESIDENT
846 UNDERWOOD AVE MARION, OHIO 43302
USA
VOTING RIGHTS-20%

MARTHA MANIACI
BOARD MEMBER
488 GIRARD AVE MARION, OH 43302
USA
VOTING RIGHTS-20%

MARY ANN STOLARCZYK
BOARD MEMBER
985 AMBOISE, MARION, OH 43302
USA
VOTING RIGHTS-20%

BETTY COMPTON
BOARD MEMEBER
150 SARA AVE APT 309 MARION, OHIO 43302
USA
VOTING RIGHTS-20%

MARGE HAZALETT
BOARD MEMBER

170 LAKEVIEW BLVD MARION, OHIO 43302
USA
VOTING RIGHTS-20%

Attachment 12

Exhibit 3

**Agreement between MMF and the
State of Ohio, dated 5/23/19**

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO

STATE OF OHIO, *ex rel.*
DAVE YOST, OHIO ATTORNEY
GENERAL

Plaintiff,

v.

MARION MIDGET FOOTBALL
846 UNDERWOOD AVE.
MARION, OH 43302

PATSY A. WORCESTER
846 UNDERWOOD AVE.
MARION, OH 43302

SCOTT SPEARS
386 BARBARA LANE
MARION, OH 43302

Defendants.

CASE NO.:

JUDGE

ASSURANCE OF DISCONTINUANCE

Pursuant to the authority granted in the Ohio Charitable Organizations Act, R.C. 1716.01 *et seq.*, specifically, R.C. 1716.16(C), and the Ohio Charitable Trust Act, R.C. 109.23 *et seq.*, specifically, R.C. 109.24(E), Ohio Attorney General Dave Yost (the “Attorney General”) accepts this Assurance of Discontinuance (“Agreement”) from Marion Midget Football, Patsy A. Worcester, and Scott Spears (collectively, the “Defendants”). The Attorney General and the Defendants, as parties to this Agreement, acknowledge and agree that it is in their best interest and consistent with the best interests of the people of the State of Ohio to resolve the issues between them in the manner set forth herein. As part of this Agreement, the Attorney General and the Defendants stipulate as follows:

I. JURISDICTION AND VENUE

- A. This Court has jurisdiction over the subject matter of this action pursuant to R.C. Chapter 1716, R.C. 109.23 *et seq.*, the rules adopted thereunder, and the Attorney General's common law authority to enforce charitable trusts. This Court has jurisdiction over the parties. Venue is proper in this Court.

II. FACTS

- B. The principal place of business of Marion Midget Football ("MMF") is currently located at 846 Underwood Avenue, Marion, OH 43302.
- C. Patsy A. Worcester resides at 846 Underwood Avenue, Marion, OH 43302.
- D. Scott Spears resides at 386 Barbara Lane, Marion, OH 43302.
- E. MMF was incorporated as a nonprofit corporation with the Ohio Secretary of State on December 18, 1972, and has operated as an Ohio charity since that date.
- F. MMF's board members, officers, and volunteers, including, but not limited to, Patsy A. Worcester and Scott Spears, held MMF out to the public as an organization established for a benevolent, philanthropic, patriotic, educational, humane, scientific, public health, environmental conservation, civic, or other eleemosynary purpose.
- G. Patsy A. Worcester, Scott Spears, and other board members, officers, and volunteers employed charitable appeals and received things of value for charitable use on behalf of MMF.
- H. MMF is a "charitable organization" as that term is defined in R.C. 1716.01(A) and a "charitable trust" as that term is defined in R.C. 109.23.
- I. The funds raised and held by the Defendants for charitable purposes were subject to a valid "charitable trust" under R.C. 109.23.

- J. The Ohio Charitable Trust Act and the Ohio Charitable Organizations Act prohibit certain acts and practices in the administration of any charitable trust and the solicitation of charitable contributions.
- K. Patsy A. Worcester and Scott Spears were board members and officers of MMF and signers on its bank accounts.
- L. Since at least 2010, Patsy A. Worcester continuously served as Treasurer of MMF. Patsy A. Worcester resigned as an officer and board member effective April 28, 2019.
- M. Since at least 2014, Scott Spears continuously served as President of MMF. Scott Spears resigned as an officer and board member effective May 7, 2019.
- N. Patsy A. Worcester and Scott Spears had fiduciary duties under R.C. 109.23 *et seq.*, R.C. 1716.17, and the common law.
- O. Since at least July 2, 2014, MMF continuously held a license (the “license”) from the Federal Communications Commission (“FCC”) to operate a low-power FM radio station (“WWGH Radio 107.1”). MMF voted to relinquish the license to the FCC on April 28, 2019.
- P. The subject of this Agreement is the charitable trust and solicitation activities of the Defendants in the State of Ohio. Such activities are described in and regulated by the Ohio Charitable Organizations Act, R.C. 1716.01 *et seq.*, the Ohio Charitable Trust Act, R.C. 109.23 *et seq.*, and the Attorney General’s common law authority to enforce charitable trusts.

III. FINDINGS OF THE ATTORNEY GENERAL

- Q. The Attorney General is the party charged with enforcing the Ohio Charitable Organizations Act and the Ohio Charitable Trust Act and has caused an investigation to

be conducted by the Charitable Law Section into the Defendants' charitable trust and solicitation activities. As a result of the investigation, the Attorney General has reason to believe the Defendants have failed to comply with the requirements of the Ohio Charitable Organizations Act, the Ohio Charitable Trust Act, and the common law by committing the following violations:

1. R.C. 1716.14(A)(12): the Defendants operated in violation of, and failed to comply with, Revised Code Chapter 1716.
2. R.C. 1716.17, R.C. 109.23(A), and common law: the Defendants breached their fiduciary duties of care, to properly manage accounts, to comply with Ohio law, and to act in the best interest of the charity, resulting in loss and other damages to the charitable beneficiaries of MMF.

R. The Attorney General's findings, as outlined above, are the basis upon which this Agreement has been negotiated. However, this Agreement is the culmination of disputed claims and does not constitute an admission of any wrongdoing by the Defendants.

IV. ASSURANCE

- S. MMF agrees to cease any involvement with WWGH Radio 107.1 following its relinquishment of the license, and the Defendants agree to perform any act deemed reasonably necessary by the Attorney General to complete the process of relinquishing the license to the FCC.
- T. For a period of five (5) years following her April 28, 2019 resignation, Patsy A. Worcester shall not hold any position as an officer, trustee, or employee of MMF or any other charitable organization or charitable trust in the State of Ohio, with the exception

that she may volunteer with charitable organizations in the State of Ohio as long as she does not have any involvement with or responsibility concerning charitable trust funds.

- U. For a period of five (5) years following her April 28, 2019 resignation, Patsy A. Worcester shall not participate in solicitations in the State of Ohio for any charitable purpose or on behalf of any charitable organization. Solicitations conducted as a volunteer, officer, trustee, employee, representative, agent, or professional solicitor (as defined in R.C. 1716.01(J)) of an organization all fall within the scope of this prohibition, as well as solicitations conducted as a person employed or otherwise engaged by a professional solicitor.
- V. For a period of five (5) years following her April 28, 2019 resignation, Patsy A. Worcester will not incorporate or create any Ohio nonprofit corporation.
- W. Scott Spears shall not hold any position as an officer, trustee, or employee of MMF or any other charitable organization or charitable trust in the State of Ohio following the date of his May 7, 2019 resignation, with the exception that he may volunteer with, or accept any offer of employment from, any charitable organization as long as he does not have any involvement with or responsibility concerning charitable trust funds.
- X. Scott Spears shall not participate in solicitations in the State of Ohio for any charitable purpose or on behalf of any charitable organization following the date of his May 7, 2019 resignation. Solicitations conducted as a volunteer, officer, trustee, employee, representative, agent, or professional solicitor (as defined in R.C. 1716.01(J)) of an organization all fall within the scope of this prohibition, as well as solicitations conducted as a person employed or otherwise engaged by a professional solicitor.

- Y. Scott Spears will not incorporate or create any Ohio nonprofit corporation following the date of his May 7, 2019 resignation.
- Z. Scott Spears agrees to pay \$12,500.00 (twelve thousand five hundred dollars and zero cents) (the “Payment Amount”) to the Ohio Attorney General’s Office. The parties understand and agree that fifty percent (50%) of the total Payment Amount shall be considered restitution, and fifty percent (50%) of the total Payment Amount shall be considered civil penalties. The Payment Amount shall be paid by certified check or money order payable to “Treasurer, State of Ohio” and mailed to:

Ohio Attorney General
Charitable Law Section
Attn: Chief Accountant
150 East Gay Street, 23rd Floor
Columbus, Ohio, 43215

Scott Spears shall pay the Payment Amount in accordance with the following payment schedule:

1. Scott Spears shall make an initial payment in the amount of \$2,000.00 (two thousand dollars and zero cents) on or before October 1, 2019.
 2. Beginning on November 1, 2019, Scott Spears shall pay the Payment Amount in monthly installments of \$300.00 (three hundred dollars and zero cents). The first installment under this paragraph shall be due on or before November 1, 2019, with subsequent installments due on or before the first day of each month.
- AA. The Attorney General shall deposit all funds paid under this Agreement. The Attorney General shall redistribute fifty percent (50%) of the initial payment and each monthly installment (the “Restitution Amount”) to MMF. The Attorney General shall redistribute available funds to MMF on at least a semi-annual basis, with the first redistribution to

occur no later than January 15, 2020. In the event that MMF fails to comply with all applicable registration and reporting requirements of Ohio Revised Code Chapters 109 and 1716 or if circumstances outside the control of the Attorney General preclude redistribution of the Restitution Amount to MMF, the Restitution Amount shall be redistributed at the discretion of the Attorney General.

- BB. The Attorney General shall deposit fifty percent (50%) of the initial payment and each monthly installment (the “Civil Penalty Amount”) into the charitable law fund established under R.C. 109.32.
- CC. If Scott Spears fails to comply with the payment requirements above, the Attorney General shall certify any and all unpaid balances of the Restitution Amount and the Civil Penalty Amount to the Ohio Attorney General’s Collections Enforcement Section (“Collections”) for collection. In the event of certification, Scott Spears agrees to pay additional collection costs assessed by Collections in accordance with Ohio Revised Code Section 131.02(A) equal to the amounts charged pursuant to Ohio Revised Code Sections 109.08 and 109.081 for the cost of certification and the use of Special Counsel for the collection of the debt. Interest shall also be charged upon certification in accordance with R.C. 131.02(D). Nothing in this paragraph should be construed to limit the Attorney General’s discretion to pursue any other available remedy.
- DD. The payment of the Restitution Amount and the Civil Penalty Amount by Scott Spears and the acceptance of such amounts by the Attorney General shall not be construed to limit the Attorney General’s authority to seek additional relief pursuant to the Ohio Charitable Organizations Act, R.C. 1716.01 *et seq.*, the Ohio Charitable Trust Act, R.C.

109.23 *et seq.*, and the common law, or to otherwise seek judicial enforcement of this Agreement, for any future violations.

EE. Within thirty (30) days after MMF signs this Agreement, MMF agrees to either (1) elect all un-filled board member and officer positions in accordance with MMF's Code of Regulations or (2) amend the provisions of the Code of Regulations pertaining to annual elections and/or the size of MMF's board, as appropriate.

FF. Within ninety (90) days after MMF signs this Agreement, all board members and officers of MMF shall complete a board governance training program presented by the Charitable Law Section of the Ohio Attorney General's Office. Attendance is free and the training can be completed via a monthly webinar offered by the Attorney General:

<https://www.ohioattorneygeneral.gov/Business/Services-for-Charities/Charitable-Webinars>

In the alternative, MMF's officers can schedule an in-person training by calling (614) 466-3181.

GG. After signing this Agreement, MMF agrees to hold a minimum of four (4) board meetings a year to vote on all official business of MMF, including, but not limited to, any compensation to be paid to individuals in exchange for services performed for MMF.

HH. Following the date this agreement is signed, MMF shall keep and maintain a written record of all board meetings and decisions and shall also keep receipts for all organizational expenses for at least three (3) years from the date of the expenditures.

II. The Defendants agree that this Agreement is made in lieu of prosecution of a civil action based upon the findings set forth herein.

JJ. The Defendants agree that any evidence of a violation of this Agreement shall be *prima facie* evidence of a violation of Chapter 1716 of the Ohio Revised Code and any rule

adopted thereunder in any subsequent action or proceeding brought by the Attorney General, as provided in R.C. §1716.16(C).

- KK. The Defendants agree that any matter closed by the acceptance of this Agreement may be reopened at any time by the Attorney General for further proceedings in the public interest based upon any violation of the terms of this Agreement or upon the discovery of evidence not known by the parties hereto at the time of signing.

V. RETENTION OF JURISDICTION

- LL. This Court shall retain jurisdiction of this action for the purpose of enforcing this Agreement.

VI. ACKNOWLEDGMENTS

- MM. The Defendants acknowledge that they have been given an opportunity to seek and be advised by legal counsel as to the meaning and effect of each provision of this Agreement and that they have elected of their own free will and accord to enter into this Agreement.
- NN. The parties hereby agree that this Agreement is binding upon the heirs, successors, and assignees of all parties hereto and that this Agreement constitutes the entire agreement and understanding of the parties.
- OO. This Agreement may be signed in counterparts which, when taken together, will constitute a single integrated document. Signed copies of the Agreement sent by fax or email will be considered to be the same as original signed versions.
- PP. This Agreement shall be effective upon execution by a duly authorized representative of the Attorney General. Each Defendant signing this Agreement understands and agrees that he or she shall be bound by all of the Agreement's terms regardless of whether any

other Defendant, board member, officer, or volunteer assents to or complies with the same terms.

THE REMAINDER OF THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.

CERTIFICATION

Each individual signing below represents that the individual is authorized and directed to sign this Agreement on behalf of the party represented and further represents that he or she has the requisite authority to bind the party on behalf of whom the individual is signing.

MARION MIDGET FOOTBALL

Signature

Print Name/Title

Date

DAVE YOST
OHIO ATTORNEY GENERAL

Daniel W. Fausey
Section Chief, Charitable Law Section


Date

PATSY A. WORCESTER, in her personal capacity

Signature

Date

SCOTT SPEARS, in his personal capacity



Signature

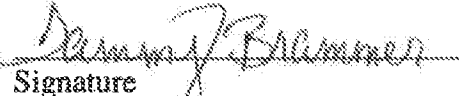


Date

CERTIFICATION

Each individual signing below represents that the individual is authorized and directed to sign this Agreement on behalf of the party represented and further represents that he or she has the requisite authority to bind the party on behalf of whom the individual is signing.

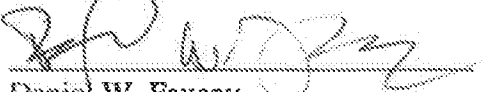
MARION MIDGET FOOTBALL


Signature

Tammy Blumner Vice President
Print Name/Title

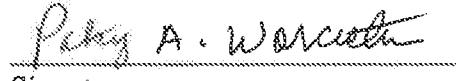
May 18, 2019
Date

DAVE YOST
OHIO ATTORNEY GENERAL


Daniel W. Fausey
Section Chief, Charitable Law Section

5/29/19
Date

PATSY A. WORCESTER, in her personal capacity


Signature

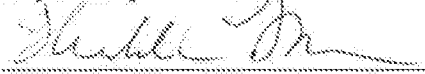
5/23/2019
Date

SCOTT SPEARS, in his personal capacity

Signature

Date

Respectfully Submitted,



Thaddius A. Townsend (0089197)

Assoc. Assist. Attorney General

Ohio Attorney General's Office

Charitable Law Section

150 E. Gay Street, 23rd Fl.

Columbus, Ohio 43215

Phone: 614-466-3181

Fax: 614-466-9788

Attorney for Plaintiff,

Ohio Attorney General Dave Yost

Exhibit 4

**Reply to LOI 1800B3-HOD sent by
MEE to FCC, dated 3/10/21**

In 2019 The Marion Education Exchange was incorporated by Shawn Craft (serving as agent) Glenn Coble, Linda Sims, and Terry Tackett. On May 29th, 2019 a meeting was held by Shawn Craft, Linda Sims, Glenn Coble, and Terry Tackett. During this meeting looking at the health, and age of board members who were coming over from Marion Midget Football it was decided that Shawn Craft would serve as President, Linda Sims would serve as secretary, and Glenn Coble and Terry Tackett would serve as board members to give the station full oversight. This has remained accurate since that day.

There are no additional documents listed with the state.

In regard to the composition of the Board of The Marion Education Exchange being populated with past board members of Marion Midget Football

On May 9th 2019 it was believed and thought that the board members would be able to continue in the same capacity that they had except for Patsy Worcester who had set a resignation/retirement for later in the month of May.

All of the board members listed on May 9th were in favor of the transfer. They stayed in touch with the station as long as their health permitted.

Those board members were

Patsy Worcester

Martha Douce Maniaci

Mary Ann Stolarzyk

& Margaret Hazalett

If they should be listed as board members from May 9th through May 29th we would be glad to do that.

As the month went on the health conditions of the board members were looked at by the incorporators, and the past board members themselves.

We had one facing dementia which was not diagnosed at that time, one facing recovery from a heart attack and having what we believed to be a short stay in a nursing facility. This turned into a permanent stay. And a board member whose cancer returned, and eventually took her life several months later.

When the May 29th board meeting was held all of those concerns were addressed, and that is how the new board was formed.

All of the past members were always made aware of what was going on through personal visits, and phone calls until that was no longer possible because of their health conditions.

We thought, and believed these members would continue when the application was applied for and granted in early and mid May of 2019.

The first time any of this was thought or known to be otherwise was on May 29th.

We also thought that since Patsy had not fully signed off on leaving that position on May 9th that we should not list any other person as her successor. Her successor was not chosen until May 29th. If this was wrong we would be more than happy to correct anything that has been done. If anything has been done it has beendone unknowingly not purposefully.

Again I believe this is about a man who has complained before about WWGH to the FCC. This

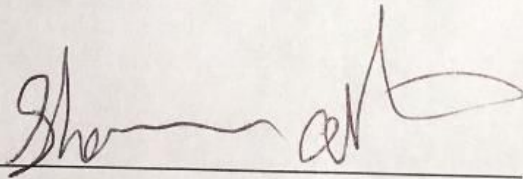
persons only goal is to see us not be on the air, and anyway he can achieve that is OK. I think his posts which have been submitted, and his past complaints, and his quickness in running to local media with these stories prove this.

He has never set foot in a board meeting, or had access to the radio station that we are aware of. All information he gets is either found on the internet, or assumed by him. we are often aware of his assumptions as they have been wrong.

I would request that you put the person who filed this complaint under penalty of perjury for any response he makes. Because he has been making assumptions from documents he obtained that are completely false. That being said if he makes them again in response to the answers we have provided we would like to have him under penalty of perjury so when we are able to respond with the truth he can be dealt with in a legal fashion.

I Shawn Craft am writing this declaration made under penalty of perjury. This declaration to the best of my ability and knowledge verifies the truth and accuracy of the information provided to the FCC, All responsive information within MEE's possession, custody, control or knowledge has been provided to the FCC.

Shawn Craft



DATE

3-10-2021



DATE	DOCUMENT ID	DESCRIPTION	FILING	EXPED	CERT	COPY
05/03/2019	201912202646	DOMESTIC NONPROFIT CORP - ARTICLES (ARN)	99.00	0.00	0.00	0.00

Receipt

This is not a bill. Please do not remit payment.

SHAWN CRAFT
1366 MONTEGO DR
MARION, OH 43302

STATE OF OHIO CERTIFICATE

Ohio Secretary of State, Frank LaRose
4330904

It is hereby certified that the Secretary of State of Ohio has custody of the business records for

THE MARION EDUCATION EXCHANGE

and, that said business records show the filing and recording of:

Document(s)

DOMESTIC NONPROFIT CORP - ARTICLES

Effective Date: 05/02/2019

Document No(s):

201912202646



United States of America
State of Ohio
Office of the Secretary of State

Witness my hand and the seal of the
Secretary of State at Columbus, Ohio this
3rd day of May, A.D. 2019.

Frank LaRose
Ohio Secretary of State

Form 532B Prescribed by:

OFFICE OF THE
Ohio Secretary of State



Toll Free: (877) SOS-FILE (877-767-3453)

Central Ohio: (614) 466-3910

www.OhioSecretaryofState.govBusseerv@OhioSecretaryofState.govFile online or for more information: www.OHBusinessCentral.com

For screen readers, follow instructions located at this path.

Mail this form to one of the following:

Regular Filing (non expedite)

P.O. Box 670

Columbus, OH 43216

Expedite Filing (Two business day processing time.
Requires an additional \$100.00)

P.O. Box 1390

Columbus, OH 43216

Initial Articles of Incorporation (Nonprofit, Domestic Corporation)

Filing Fee: \$99

(114-ARN)

Form Must Be Typed

2019 MAY -2 AM 11:57

Please check the box if this nonprofit corporation is being formed for the following purpose:

- ☐ Community Improvement Corporation (Economic Development or Land Reutilization) - Please see Ohio Revised Code Chapter 1724 or the instructions at the end of this form for more information.

First: Name of Corporation

Second: Location of Principal Office in Ohio

City

State

County

Optional: Effective Date (MM/DD/YYYY)

(The legal existence of the corporation begins upon the filing of the articles or on a later date specified that is not more than ninety days after filing.)

Third: Purpose for which corporation is formed

The purpose of The Marion Education Exchange is to provide the community of Marion, Ohio with educational information of all kinds. From news, to weather, to obituaries, to entertainment, to local events that are available for the public and to the public of Marion Ohio and other areas. This will be done through programs of all kinds

**** Note:** for Nonprofit Corporations: The Secretary of State does not grant tax exempt status. Filing with our office is not sufficient to obtain state or federal tax exemptions. Contact the Ohio Department of Taxation and the Internal Revenue Service to ensure that the nonprofit corporation secures the proper state and federal tax exemptions. These agencies may require that a purpose clause be provided. **

**** Note:** ORC Chapter 1702 allows for additional provisions to be included in the Articles of Incorporation that are filed with this office. If including any of these additional provisions, please do so by including them in an attachment to this form. **

Original Appointment of Statutory Agent

The undersigned, being at least a majority of the incorporators of

The Marion Education Exchange

(Name of Corporation)

hereby appoint the following to be Statutory Agent upon whom any process, notice or demand required or permitted by statute to be served upon the corporation may be served. The complete address of the agent is:

Shawn Craft

(Name of Statutory Agent)

1366 Montego Dr

(Mailing Address)

Marion

(Mailing City)

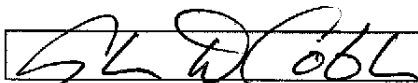
OH

(Mailing State)

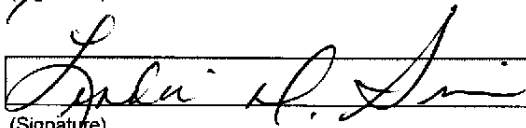
43302

(Mailing ZIP Code)

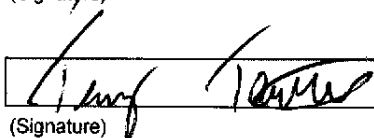
Must be signed by
the incorporators or
a majority of the
incorporators.



(Signature)



(Signature)



(Signature)

Acceptance of Appointment

The Undersigned,

Shawn Craft

(Name of Statutory Agent)

, named herein as the

Statutory agent for

The Marion Education Exchange

(Name of Corporation)

hereby acknowledges and accepts the appointment of statutory agent for said corporation.

Statutory Agent Signature



(Individual Agent's Signature / Signature on Behalf of Business Serving as Agent)

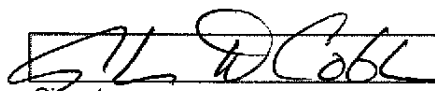
By signing and submitting this form to the Ohio Secretary of State, the undersigned hereby certifies that he or she has the requisite authority to execute this document.

Required

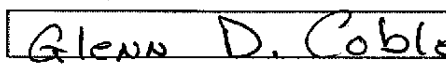
Articles and original appointment of agent must be signed by the incorporator(s).

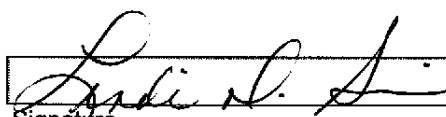
If the incorporator is an individual, then they must sign in the "signature" box and print his/her name in the "Print Name" box.

If the incorporator is a business entity, not an individual, then please print the entity name in the "signature" box, an authorized representative of the business entity must sign in the "By" box and print his/her name and title/authority in the "Print Name" box.



Signature

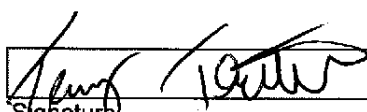

By (if applicable)


Print Name

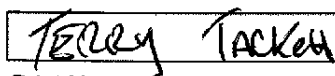

Signature

By (if applicable)


Print Name


Signature

By (if applicable)


Print Name

ARTICLES OF INCORPORATION

OF

The Marion Education Exchange

The undersigned, a natural person over the age of eighteen years, hereby certifies as follows:

ARTICLE I — NAME

The name of the corporation is **The Marion Education Exchange** (hereinafter referred to as the "Corporation").

ARTICLE II — REGISTERED OFFICE ADDRESS

The principal office of the Corporation is to be located at **1366 Montego Dr.** The name and address in the Corporation's initial agent for service of process is: **Shawn Craft, 1366 Montego Dr]**

ARTICLE III — PURPOSE

The purpose of The Marion Education Exchange is to provide the community of Marion, Ohio with educational information of all kinds. From news, to weather, to obituaries, to entertainment, to local events that are available for the public and to the public of Marion Ohio and other areas. This will be done through programs of all kinds

ARTICLE IV — EXEMPTION REQUIREMENTS

At all times the following shall operate as conditions restricting the operations and activities of the Corporation:

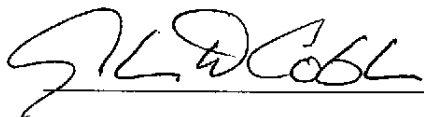
1. No substantial part of the activities of the Corporation shall be the carrying on of

propaganda

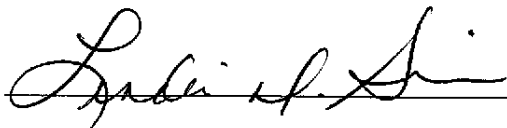
ARTICLE V — DURATION / DISSOLUTION

The duration of the corporate existence shall be perpetual. In the event of liquidation, dissolution, or winding up of the Corporation, whether voluntary, involuntary, or by the operation of law, the assets of the Corporation remaining after the payment, satisfaction, and discharge of liabilities or obligations, shall be distributed for one or more exempt purposes or the corresponding section of any future federal tax code, or shall be distributed to the federal government, or to a state or local government, for a public purpose. Any such assets not so disposed of shall be disposed of by a Court of Competent Jurisdiction of the county in which the principal office of the corporation is then located, exclusively for such purposes or to such organization or organizations, as said Court shall determine, which are organized and operated exclusively for such purposes.

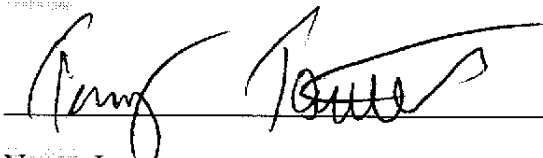
IN WITNESS WHEREOF, I have subscribed my name this 29th day of April 2019.



Name, Incorporator



Name, Incorporator



Name, Incorporator

Exhibit 5

Ohio Revised Code 1702.15 -

<http://codes.ohio.gov/orc/1702.15v1>

1702.15 Corporation to keep books and records of account and minutes of proceedings.

Each corporation shall keep correct and complete books and records of account, together with minutes of the proceedings of its incorporators, members, directors, and committees of the directors or members. Subject to limitations prescribed in the articles or the regulations upon the right of members of a corporation to examine the books and records, all books and records of a corporation, including the membership records prescribed by section [1702.13](#) of the Revised Code, may be examined by any member or director or the agent or attorney of either, for any reasonable and proper purpose and at any reasonable time.

Effective Date: 04-10-2001 .

Exhibit 6

**FCC application BTCL-20190528AAN,
dated 5/28/19**

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0009 (June 2010)	FOR FCC USE ONLY
FCC 316		
APPLICATION FOR CONSENT TO ASSIGN BROADCAST STATION CONSTRUCTION PERMIT OR LICENSE OR TO TRANSFER CONTROL OF ENTITY HOLDING BROADCAST STATION CONSTRUCTION PERMIT OR LICENSE		FOR COMMISSION USE ONLY FILE NO. BTCL - 20190528AAN
Read INSTRUCTIONS Before Filling Out Form		

Section I - General Information

1.	Legal Name of the Licensee/Permittee THE MARION EDUCATION EXCHANGE		
	Mailing Address 1366 MONTEGO DR		
	City MARION	State or Country (if foreign address) OH	Zip Code 43302 -
	Telephone Number (include area code) 7402623203	E-Mail Address (if available) SHAWNDOG29@GMAIL.COM	
	FCC Registration Number: 0023109846	Call Sign WWGH-LP	Facility ID Number 193826
2.	Contact Representative (if other than licensee/permittee) THE MARION EDUCATION EXCHANGE		Firm or Company Name
	Mailing Address 1366 MONTEGO DR		
	City MARION	State or Country (if foreign address) OH	ZIP Code 43302 -
	Telephone Number (include area code) 7402623203		E-Mail Address (if available) SHAWNDOG29@GMAIL.COM
3.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input checked="" type="radio"/> Noncommercial Educational Licensee/Permittee <input type="radio"/> Other <input type="radio"/> N/A (Fee Required)		
4.	a. <input checked="" type="radio"/> Voluntary Assignment or Transfer of Control <input type="radio"/> Involuntary Assignment or Transfer of Control <input type="radio"/> Amendment to pending application File number of pending application: - If an amendment, submit as an Exhibit a listing, by Section and Question Number, of the portions of the pending application that are being revised. [Exhibit 1] b. Applicant certifies that the use of FCC Form 316 is appropriate for this transaction. <input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 2]		
5.	Were any of the authorizations that are the subject of this application obtained through the Commission's competitive bidding procedures (see 47 C.F.R. Sections 1.2111(a) and 73.5000)? If yes, list pertinent authorizations in an Exhibit.		<input type="radio"/> Yes <input checked="" type="radio"/> No [Exhibit 3]

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Assignor/Transferor

1.	Certification. Assignor/Transferor certifies that it has answered each question in this application based on its review	
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☒ Yes ☐ No

of the application instructions and worksheets. Assignor/Transferor further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.

2.	Application for (check one):	<input type="radio"/>	Consent to Assign Construction Permit	<input type="radio"/>	Consent to Transfer Control of Permittee
		<input type="radio"/>	Consent to Assign License	<input checked="" type="radio"/>	Consent to Transfer Control of Licensee
		<input type="radio"/>	Amendment to pending application		

3.	Legal Name of the Assignor/Transferor PATTI WORCESTER			
	Mailing Address 846 UNDERWOOD AVE			
	City MARION	State or Country (if foreign address) OH	Zip Code 43302 -	
	Telephone Number (include area code) 7402231167		E-Mail Address (if available)	

4.	Contact Representative (if other than Assignor/Transferor)		Firm or Company Name	
	Mailing Address			
	City	State or Country (if foreign address)	Zip Code	
	Telephone Number (include area code)		E-Mail Address (if available)	

If more than one Transferor, submit the information requested in Questions 3 and 4 for each transferor. [Exhibit 4]

5.	Authorizations to be Assigned/Transferred. List the authorized stations and construction permits to be assigned/transferred. Provide the Facility Identification Number and the Call Sign, or the Facility Identification Number and the File Number of the Construction Permit, and the location, for each station to be assigned/transferred. Include main stations, FM and/or TV translator stations, LPTV stations, FM and/or TV booster stations.				
	[Enter Station Information]				
	List the authorized stations and construction permits to be assigned/transferred. Provide the Facility Identification Number and the Call Sign, or the Facility Identification Number and the File Number of the Construction Permit, and the location, for each station to be assigned/transferred. Include main stations, FM and/or TV translator stations, LPTV stations,, FM and/or TV booster stations.				
	Facility ID Number	Call Sign	or Construction Permit File Number	City	State
	193826	WWGH-LP	-	MARION	OH

6.	Agreements for Sale/Transfer of Station. a. If the transaction is voluntary, Assignor/Transferor certifies that: i. it has placed in licensee's/permittee's public inspection file(s) and submitted as an exhibit to this item copies of all agreements for the assignment/transfer of the station(s); ii. these documents embody the complete and final understanding between assignor/transferor and assignee/transferee; and iii. these agreements comply fully with the Commission's rules and policies. b. If the transaction is involuntary, the Assignor/Transferor certifies that court orders or other authorizing documents have been issued and that it has placed in the licensee's/permittee's public inspection file(s) and submitted to the Commission copies of such court orders or other authorizing documents. Exhibit Required	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A [Exhibit 5]
		<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A [Exhibit 6]

7.	Character Issues. Assignor/Transferor certifies that neither licensee/permittee nor any party to the application has or has had any interest in, or connection with: a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or any party to the application; or b. any pending broadcast application in which character issues have been raised.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 7]

8.	Adverse Findings. Assignor/Transferor certifies that, with respect to the assignor/transferor and each party to the	<input checked="" type="radio"/> Yes <input type="radio"/> No
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	application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	See Explanation in [Exhibit 8]
9.	Auction Authorization. Assignor/transferor certifies that more than five years have passed since the issuance of the construction permit for the station being assigned, where that permit was acquired in an auction through the use of a bidding credit or other special measure.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 9]
10.	Anti-Drug Abuse Act Certification. Assignor/Transferor certifies that neither licensee/permittee nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing PATTI WORCESTER	Typed or Printed Title of Person Signing BOARD PRESIDENT
Signature	Date 05/28/2019

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section III - Assignee/Transferee

1.	Certification. Assignee/Transferee certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Assignee/Transferee further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No
2.	Legal Name of the Assignee/Transferee SHAWN CRAFT Mailing Address 1366 MONTEGO DR City MARION State or Country (if foreign address) OH Zip Code 43302 - Telephone Number (include area code) 7402623203 E-Mail Address (if available)	
3.	Contact Representative (if other than Assignee/Transferee) Firm or Company Name Mailing Address City State or Country (if foreign address) Zip Code - Telephone Number (include area code) E-Mail Address (if available)	
If more than one Transferee, submit the information requested in Questions 2 and 3 for each transferee. [Exhibit 10]		
4.	Agreements for Sale/Transfer of Station. Assignee/Transferee certifies that: a. the written agreements in the licensee/permittee's public inspection file embody the complete and final agreement for the sale or transfer of the station(s); and b. these agreements comply fully with the Commission's rules and policies.	<input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 11]
5.	Changes in interests as a result of assignment/transfer. a. [Enter Changes in Interests Information]	

	or [Exhibit 12]	
	b. Applicant certifies that equity interests not set forth above are non-attributable.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A [Exhibit 13]
6.	Other Authorizations. List call signs, locations, and facility identifiers of all other broadcast stations in which assignee/transferee or any party to the application has an attributable interest.	<input checked="" type="checkbox"/> N/A [Exhibit 14]
7.	Acquisition of Control. List the file number and date of grant of FCC Form 301, 314, or 315 application by which the Commission approved the qualifications of the individual or entity with a pre-existing interest in the licensee/permittee that is now acquiring control of the licensee/permittee as a result of the grant of this application.	<input checked="" type="checkbox"/> N/A [Exhibit 15]
8.	Character Issues. Assignee/Transferee certifies that neither assignee/transferee nor any party to the application has or has had any interest in, or connection with: a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or any party to the application; or b. any pending broadcast application in which character issues have been raised.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 16]
9.	Adverse Findings. Assignee/Transferee certifies that, with respect to the assignee/transferee and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 17]
10.	Alien Ownership and Control. Assignee/Transferee certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 18]
11.	Auction Authorization. Assignee/transferee certifies that where less than five years have passed since the issuance of the construction permit and the permit had been acquired in an auction through the use of a bidding credit or other special measure, it would qualify for such credit or other special measure.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 19]
12.	Anti-Drug Abuse Act Certification. Assignee/transferee certifies that neither licensee/permittee nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing SHAWN CRAFT	Typed or Printed Title of Person Signing BOARD PRESIDENT
Signature	Date 05/28/2019

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 5
Description: TRANSFER

PATTI WORCESTER HAS DECIDED TO RETIRE AND VOLUNTARILY TRANSFERS HER POSITION TO SHAWN CRAFT AND THE PAPERWORK IS FILED

Attachment 5

Exhibit 7

Response to LOI by MEE, dated 2/17/21

Text of Reply from WWGH-LP/Marion Education Exchange sent to FCC on February 17, 2021.

THE MARION EDUCATION EXCHANGE IS FILING FOR THIS PETITION FOR RECONSIDERATION IN REGARD TO WWGH-LP FM FOR THE FOLLOWING REASONS. WE AT THE MARION EDUCATION EXCHANGE DID NOT RECEIVE ANY COMMUNICATION THAT WAS EMAILED TO US ON DECEMBER 8TH. BECAUSE WE DID NOT RECEIVE THIS COMMUNICATION WE DID NOT RESPOND WITHIN 30 DAYS WHICH IS WHAT LED TO THE CONSEQUENCES THAT FOLLOWED. WE FIRST BECAME AWARE OF THE CANCELLATION OF THE LICENSE ON FEBRUARY 12TH WHEN WE WERE CONTACTED BY THE LOCAL NEWSPAPER 'THE MARION STAR' IN REGARD TO DOING AN INTERVIEW ON THE CANCELLATION OF OUR LICENSE.

WE HAVE HAD EVERY INTENSION TO WORK WITH OR COOPERATE WITH THE FCC IN ANY WAY. WE HAVE FOR NEARLY SEVEN YEARS ANYTIME WE WERE ASKED TO PROVIDE SOMETHING OR RESPOND TO SOMETHING.

WE ARE NOT AWARE OF HOW OR WHY THE LOCAL NEWSPAPER WAS MADE AWARE OF THIS DECISION. MAYBE MR. PHELPS WOULD KNOW?

IN REGARD TO THE COMPLAINT FILED BY SPENCER PHELPS

-MR. PHELPS FOR SEVERAL YEARS WAS THE MANAGER OF WDIF-LP IN MARION, OHIO.

-MR. PHELPS HAS MADE IT VERY CLEAR ON MANY OCCASIONS THAT HE DOES NOT LIKE OUR STATION, AND DOES NOT LIKE WHAT WE DO.

-HE HAS COMPLAINED TO THE FCC IN THE PAST

-HE HAS CALLED SUPPORTERS AND VOLUNTEERS OF/AT THE STATION AND SAID THINGS THAT WERE NEGATIVE IN REGARD TO WWGH

-HE HAS MADE PHONE CALLS TO LANDLORDS OF BUILDINGS WE WERE RESIDING IN MAKING NEGATIVE COMMENTS

-THE LIST IS LONG AND CERTAINLY SHOWS MR. PHELPS HAS A PERSONAL VENDETTA AGAINST WWGH, AND HAS FOR MANY YEARS. ALSO HE CERTAINLY HAD SOMETHING TO GAIN AS A MANAGER OF A STATION IN THE SAME CITY IF WE WERE TO NO LONGER EXIST.

THE TRANSFER OF CONTROL FROM MARION MIDGET FOOTBALL TO THE MARION EDUCATION EXCHANGE WAS A VOLUNTARY TRANSFER AS MIDGET FOOTBALL HELD A MEETING IN APRIL OF 2019 AND VOTED TO LET THE LICENSE GO. THEY HAD EVERY RIGHT TO VOTE TO KEEP THE STATION AND THEY DID NOT. IT WAS NEVER FORCED OR MANDATORY. IT WAS A DECISION VOTED ON BY 'THE MARION MIDGET FOOTBALL' BOARD.

THE MARION EDUCATION EXCHANGE'S BOARD CONSISTS OF

SHAWN CRAFT-PRESIDENT 2019-PRESENT

LINDA SIMS-BOARD MEMBER 2019-PRESENT

GLENN COBLE-BOARD MEMBER 2019-PRESENT

TERRY TACKETT-BOARD MEMBER 2019-PRESENT

SEVERAL OF THE BOARD MEMBERS THAT LEFT MIDGET FOOTBALL IN 2019 BECAME ILL AND HAVE SINCE PASSED AWAY SUCH AS MARTHA DOUCE MANIACI, AND MARGARET HAZALETT.

THERE POSITIONS WERE FILLED WITH MEMBERS WHO KNEW THE RADIO STATION AND HAVE HAD ITS BEST INTERESTS AND THAT OF THE COMMUNITY AT HEART.

ANY FURTHER INFORMATION OR QUESTIONS YOU MIGHT HAVE.....PLEASE FEEL FREE TO CONTACT ME PERSONALLY AT ANYTIME

(Shawn Craft's phone number and e-mail were listed here)

WWGH RADIO HAS FULFILLED THE EDUCATION QUALIFICATION FOR LPFM STATIONS VERY WELL. WE ARE THE LAST STATION IN MARION OHIO TO PROVIDE LOCAL NEWS & WEATHER EVERY HOUR....AS WELL AS LOCAL OBITUARIES FOUR TIMES A DAY.....AS WELL AS PROGRAMS DEDICATED TO MARIONS PAST PRESENT AND FUTURE.

WE ARE A LIFELINE FOR MANY PEOPLE IN THE COMMUNITY FREE OF CHARGE WHATEVER CHANGE YOU WOULD WANT US TO MAKE WE WOULD BE HAPPY TO DO.....AND WOULD BE HAPPY TO END THIS CRUSADE THAT HAS BEEN CONTINUED FOR SEVERAL YEARS NOW BY MR. PHELPS

IF WE HAVE DONE ANYTHING THAT NEEDS TO BE AMENDED WE WOULD BE HAPPY TO DO IT, ANYTHING THAT WAS BEEN DONE THAT THE FCC WOULD LIKE CHANGED WE WOULD BE MORE THAN HAPPY TO COMPLY WITH.

I KNOW THE FCC IS HERE TO KEEP STATIONS ON THE AIR, AND WE ARE ONE OF THOSE....THAT IS THE DIFFERENCE HERE MR. PHELPS ONLY GOAL IS TO SEE US GO OFF THE AIR....NOT TO FIX A PROBLEM....TO HAVE US NO LONGER EXIST

NO OTHER COMPLAINTS OF THIS NATURE HAVE COME IN, OR TIME SPENT IN FORMING THESE COMPLAINTS OTHER THAN THAT OF MR PHELPS.

THEY ARE NOT MADE TO MAKE US BETTER....THEY ARE MADE TO MAKE US GO AWAY.

WE WOULD BE HONORED TO CONTINUE BROADCASTING OF THE HIGHEST QUALITY