



Federal Communications Commission  
Washington, D.C. 20554

April 27, 2023

**VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED AND E-MAIL**

World Federation of Pastors and Ministers of the Full Gospel, Inc.  
c/o Mr. Dan J. Alpert, Esq.  
The Law Office of Dan J. Alpert  
2120 21st Rd. N  
Arlington, VA 22201  
(sent by e-mail to: [dja@commlaw.tv](mailto:dja@commlaw.tv))

In re: **NCE MX Group 95**

**World Federation of Pastors and  
Ministers of the Full Gospel, Inc.**

New NCE, Country Squire Lakes, IN  
Facility ID No. 768120  
File No. 0000167179

**Olivet Nazarene University**

New NCE, Bloomington, IN  
Facility ID No. 765034  
File No. 0000165984

**Lushomo Health Education Centre**

New NCE, Ellettsville, IN  
Facility ID No. 768891  
File No. 0000167818

**Appalachian Educational  
Communication Corporation**

New NCE, Ellettsville, IN  
Facility ID No. 768389  
File No. 0000167447

**Community Radio for Hoosiers, Inc.**

New NCE, Seymour, IN  
Facility ID No. 768880  
File No. 0000167634

**New Beginnings Movement, Inc.**

New NCE, Seymour, IN  
Facility ID No. 768892  
File No. 0000167516

**Letter of Inquiry – Response Required**

Dear Counsel:

This letter concerns the above-referenced application of World Federation of Pastors and Ministers of the Full Gospel, Inc. (World Federation) for a construction permit for a new noncommercial educational (NCE) FM station in Country Squire Lakes, Indiana (World Federation Application).<sup>1</sup> The Media Bureau (Bureau) identified the World Federation Application as the tentative selectee of NCE MX Group 95.<sup>2</sup> Subsequently, Lushomo Health Education Centre (Lushomo) and New Beginnings Movement, Inc. (New Beginnings) each filed a Petition to Deny the World Federation Application (Lushomo Petition<sup>3</sup> and New Beginnings Petition,<sup>4</sup> respectively). World Federation filed an Opposition to the Lushomo Petition (Lushomo Opposition)<sup>5</sup> and an Opposition to the New Beginnings Petition (New Beginnings Opposition).<sup>6</sup> Lushomo filed a Reply (Lushomo Reply).<sup>7</sup>

The Bureau is investigating potential violations of the Communications Act of 1934, as amended (Act), and the Commission's rules (rules), including potential misrepresentation and/or lack of candor in connection with the World Federation Application, the Lushomo Opposition, and the New Beginnings Opposition.<sup>8</sup> Specifically, the Bureau is investigating: (a) the validity of information provided in and certifications made in the World Federation Application; (b) the validity of information provided in the Lushomo Opposition and the New Beginnings Opposition. Accordingly, pursuant to sections 4(i), 4(j), 308(b), and 403 of the Act, we direct World Federation to provide the information and documents specified in Attachment A to this letter within **30 days** of the date of this letter of inquiry (LOI).

## **Background**

*Lushomo Petition.* The Lushomo Petition argues that World Federation is part of a “consolidated enterprise” that includes four low power FM (LPFM) stations in Florida (Florida LPFM Stations) and C.E.L.A. International University Inc. (CIU).<sup>9</sup> Lushomo alleges that, through World Federation's connection to Fermin Castaneda (Castaneda), who is a former common director of CIU, the Florida LPFM Stations, and World Federation, and World Federation director Sonia Valdez (Valdez), World Federation has an attributable interest in the Florida LPFM Stations, and that grant of the World Federation Application would therefore violate the cross-ownership restrictions in section 73.860 of the rules.<sup>10</sup> In addition, Lushomo argues that Nestor Gabriel Kost (Kost), who is the president of CIU, a director of one of the Florida LPFM Stations, and World Federation's founder and former director, “continues to exert de facto control over [World Federation] and is therefore an impermissible

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<sup>1</sup> Application File No. 0000167179. The World Federation Application was amended on November 9, 2021, March 24, 2022, and August 22, 2022.

<sup>2</sup> *NCE MX Group 95*, Letter Order, DA 22-749 (MB July 12, 2022).

<sup>3</sup> Pleading File No. 0000197464 (filed Aug. 11, 2022). Lushomo also filed a Supplement to its petition, Pleading File No. 0000198432 (filed Aug. 26, 2022).

<sup>4</sup> Pleading File No. 0000197396 (filed Aug. 10, 2022).

<sup>5</sup> Pleading File No. 0000198292 (filed Aug. 24, 2022).

<sup>6</sup> Pleading File No. 0000198291 (filed Aug. 24, 2022).

<sup>7</sup> Pleading File No. 0000199483 (filed Sept. 6, 2022).

<sup>8</sup> *See* 47 C.F.R. § 1.17.

<sup>9</sup> Lushomo Petition at 7.

<sup>10</sup> *Id.* at 3-4; *see* 47 CFR § 73.860.

undisclosed real-party-[in]-interest.”<sup>11</sup> Lushomo bases its allegation regarding Kost, in part, on information found on World Federation’s website.<sup>12</sup>

In the Lushomo Opposition, World Federation states that it “has no involvement” with CIU or the Florida LPFM Stations.<sup>13</sup> It further states that “even *if*” Lushomo’s allegation of undisclosed attributable interests is accurate, it has no bearing on the outcome of the World Federation Application because such attributable interests would not have impacted the Commission’s identification of World Federation as the tentative selectee in NCE MX Group 95.<sup>14</sup> Regarding Kost, World Federation states that, while Kost “continues to serve as an advisor to the organization, he retains no control over the organization.”<sup>15</sup> World Federation also asserts that the Lushomo Petition references an old website for its allegation regarding Kost, and that Lushomo “pointedly failed” to provide the Commission with the current website.<sup>16</sup>

In its reply, Lushomo argues that World Federation does not deny that it has an attributable interest in the Florida LPFM Stations, and reiterates its argument that grant of the World Federation Application would violate the Commission’s cross-ownership rules.<sup>17</sup> In addition, Lushomo states that World Federation does not adequately explain the ties between Kost, CIU, and World Federation.<sup>18</sup> Lushomo also asserts that World Federation’s current website was created after the Lushomo Petition was filed, and that World Federation was therefore disingenuous in accusing Lushomo of failing to provide the current website to the Commission.<sup>19</sup>

*New Beginnings Petition.* The New Beginnings Petition asserts, *inter alia*, that World Federation’s “Florida Secretary of State records leave some question as to whom [World Federation’s] principals actually are.”<sup>20</sup>

In the New Beginnings Opposition, World Federation states that “the identities of the principals named in the Application are accurate at this time.”<sup>21</sup> World Federation also states that Castaneda was an accountant for World Federation, that he became a director on May 6, 2022, and that he resigned on August 22, 2022, due to “the confusion being generated by his service as a Member of the Board.”<sup>22</sup>

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<sup>11</sup> Lushomo Petition at 2.

<sup>12</sup> *Id.* at 5.

<sup>13</sup> Lushomo Opposition at 7 n.4; Declaration of Ismelda Blanco, Attach. 16 to Lushomo Opposition and Attach. 1 to New Beginnings Opposition (Blanco Declaration).

<sup>14</sup> Lushomo Opposition at 5.

<sup>15</sup> *Id.* at 7.

<sup>16</sup> *Id.*

<sup>17</sup> Lushomo Reply at 4.

<sup>18</sup> *Id.* at 6-7.

<sup>19</sup> *Id.* at 6. The Lushomo Reply includes an attachment showing results from a search of the WHOIS database that states the World Federation website was created on August 24, 2022, which is the same day that World Federation filed the Lushomo Opposition. *Id.* at Attach.

<sup>20</sup> New Beginnings Petition at 3.

<sup>21</sup> New Beginnings Opposition at 4.

<sup>22</sup> Blanco Declaration.

## Documents and Information to Be Provided

In light of the foregoing, we seek additional information, as set forth in Attachment A, to determine: (a) the validity of information provided in and certifications made in the World Federation Application; and (b) the validity of information provided in the Lushomo Opposition and the New Beginnings Opposition. This letter constitutes an order of the Commission to produce the documents and information requested herein.<sup>23</sup> To knowingly or willfully make any false statement, or conceal any material fact in reply to this letter, is punishable by fine or imprisonment.<sup>24</sup> **Failure to respond appropriately to this letter constitutes a violation of the Act and rules.**<sup>25</sup> In addition, a failure to respond appropriately to this letter may result in **dismissal of the World Federation Application.**<sup>26</sup>

Attachment A to this letter includes filing requirements and instructions for your response and definitions for certain terms in this letter. Requests for confidential treatment or claims of attorney-client privilege or attorney work product must strictly meet the requirements stated in the attached instructions.

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<sup>23</sup> See 47 U.S.C. § 155(c)(3).

<sup>24</sup> See 18 U.S.C. § 1001; see also 47 CFR § 1.17.

<sup>25</sup> See 47 U.S.C. § 503(b)(1)(B); see also e.g., *Aura Holdings of Wisconsin, Inc.*, Notice of Apparent Liability for Forfeiture, 33 FCC Rcd 3688, 3696, para. 21 (2018), *aff'd*, Forfeiture Order, 34 FCC Rcd 2540 (2019) (imposing a \$19,693 penalty for failure to respond to letter of inquiry); *ABC Fulfillment Services LLC d/b/a HobbyKing USA LLC and HobbyKing.com, and Indubitably, Inc. d/b/a HobbyKing USA LLC, HobbyKing and HobbyKing.com*, Notice of Apparent Liability for Forfeiture, 33 FCC Rcd 5530 (2018) *aff'd*, Forfeiture Order, 35 FCC Rcd 7441 (2020), *recon. denied*, Memorandum Opinion and Order, 36 FCC Rcd 10688 (2021) (imposing \$39,278 forfeiture for failure to respond to letter of inquiry).

<sup>26</sup> 47 CFR § 73.3568(a) (“... failure to respond to official correspondence or request for additional information, will be cause for dismissal”); see also *LPFM MX Group 37*, Memorandum Opinion and Order, 31 FCC Rcd 7512, 7517, para. 12 (2016) (dismissing application for failure to respond to letter of inquiry).

If you have any questions about this matter, please contact Alexander Sanjenis at 202-418-2779 or [alexander.sanjenis@fcc.gov](mailto:alexander.sanjenis@fcc.gov). In the event that a response by email would exceed 5 MB, you must first contact Mr. Sanjenis to explain the nature of the documentation and seek guidance as to whether the submission should be reduced by providing representative documents, rather than all documents, of a particular nature.

World Federation is expected to provide a complete response by the deadline. If World Federation cannot provide all requested information or Documents by the deadline, it must submit all information it is able to obtain by the deadline, fully explain why certain information could not be provided, and indicate when such information will be submitted.

Sincerely,

Albert Shuldiner  
Chief, Audio Division  
Media Bureau

#### **Attachments**

cc: Olivet Nazarene University  
c/o Mr. Brian McIntyre Utter  
(sent by e-mail to: [bjutter@olivet.edu](mailto:bjutter@olivet.edu))

Appalachian Educational Communication Corporation  
c/o Mr. Kenneth C. Hill  
(sent by e-mail to: [appedu@yahoo.com](mailto:appedu@yahoo.com))

Community Radio for Hoosiers Inc.  
c/o Mr. Bruce Quinn  
(sent by e-mail to: [brucequinn@hotmail.com](mailto:brucequinn@hotmail.com))

New Beginnings Movement Inc.  
c/o Mr. Martin Hensley  
(sent by e-mail to: [hensleym31@aol.com](mailto:hensleym31@aol.com))

Lushomo Health Education Centre  
c/o Mr. Donald E. Martin, Esq.  
(sent by e-mail to: [dempc@prodigy.net](mailto:dempc@prodigy.net))

## ATTACHMENT A

### Inquiries: Information and Documents to be Provided

You must provide the following information and documents as requested below, and in accordance with the Instructions and Definitions that follow the inquiries. To ensure you provide complete and full responses to all inquiries, carefully review the Definitions that follow these inquiries and the Instructions regarding Document production and retention.

### Requests for Information

Provide answers to the following inquiries:

1. World Federation states that it “has no involvement” with CIU.<sup>27</sup>
  - a. Explain why the World Federation Application lists the address and phone number for World Federation and its three directors as the same address and phone number as CIU.<sup>28</sup>
  - b. Provide a copy of all Documents, if any, referring or relating in any way to World Federation and its directors’ relationship with CIU.
  
2. World Federation states that it “has no involvement” with the Florida LPFM Stations.<sup>29</sup>
  - a. Explain why the World Federation Application lists the address for World Federation as being located in the same building as three of the Florida LPFM Stations, specifically: (1) WVGK-LP; (2) WPSI-LP; and (3) WNGK-LP.<sup>30</sup>
  - b. Lushomo alleges that an interview with Valdez on YouTube indicates an ongoing relationship between Valdez and the Florida LPFM Stations.<sup>31</sup>
    - i. Confirm or deny the accuracy of Lushomo’s transcription of the interview.<sup>32</sup> If the transcript is inaccurate, or Valdez is not the individual being interviewed, describe such inaccuracies.
    - ii. Describe in detail Valdez’s relationship, if any, with each of the Florida LPFM Stations. If no relationship exists, provide a signed and dated affidavit or declaration from Valdez stating as much.

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<sup>27</sup> Lushomo Opposition at 7 n.4; Blanco Declaration.

<sup>28</sup> See Attachs. B-C hereto.

<sup>29</sup> Lushomo Opposition at 7 n.4; Blanco Declaration.

<sup>30</sup> See Attach. D hereto for the addresses of the Florida LPFM Stations as listed in Amended Annual Report filings with the Florida Secretary of State.

<sup>31</sup> Lushomo Petition at 7 (citing <https://www.youtube.com/watch?v=NpVsMO6hGwQ>).

<sup>32</sup> *Id.*

- c. Provide a copy of all Documents, if any, referring or relating in any way to World Federation and its directors' relationship with the Florida LPFM Stations.
3. World Federation states that Kost is an advisor to its organization.<sup>33</sup>
  - a. Describe in detail Kost's role as an advisor to World Federation, and Kost's involvement, if any, in the preparation and filing of the World Federation Application.
4. Castaneda was simultaneously a director of World Federation, each of the Florida LPFM Stations, and CIU per Amended Annual Reports filed with the Florida Secretary of State.<sup>34</sup>
  - a. Explain in detail Castaneda's involvement with the Florida LPFM Stations and CIU, including any coordinated work or activities between these organizations and World Federation.
  - b. Provide Documents, such as minutes of meetings of the World Federation board, showing Castaneda's involvement with World Federation and his duties as a director, including the percentage of voting interest held by Castaneda when he was a director.
  - c. Castaneda was removed from the list of directors of World Federation and each of the Florida LPFM Stations per Amended Annual Reports filed on August 23, 2022.<sup>35</sup>
    - i. Describe any coordination or communication between World Federation and the Florida LPFM Stations regarding the removal of Castaneda as a director, and the August 23, 2022, Amended Annual Report filings.
5. Financial Information.
  - a. State who paid all legal fees, engineering fees, consulting fees, or other fees or costs incurred in connection with the preparation and filing of the World Federation Application.
  - b. Provide a copy of all invoices and Documentation of payment for all fees or costs incurred and services rendered in connection with the preparation and filing of the World Federation Application.
6. Provide a signed and dated affidavit or sworn declaration from each director listed in the World Federation Application (1) affirming his or her membership and positional interest in World Federation, and (2) providing his or her identity and address, as shown in a copy of that director's driver's license or other state-issued form of identification attached to such affidavit or declaration, and his or her current personal telephone number.<sup>36</sup>

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<sup>33</sup> Lushomo Opposition at 7 n.4; Blanco Declaration.

<sup>34</sup> See Attach. E hereto.

<sup>35</sup> See Attach. D hereto.

<sup>36</sup> If a director's address has changed from the address shown in the document attached to the affidavit or

7. The Lushomo Reply includes an attachment indicating that World Federation's website, <http://www.wfpmfg.com>, was created on August 24, 2022.<sup>37</sup>
  - a. Confirm or deny that the website was created on August 24, 2022.
  - b. If the website was not created on August 24, 2022, provide Documentation showing when it was created.

Provide the full legal name of each Person employed or relied upon by World Federation to respond to or answer this LOI. Provide the mailing address, email address, and telephone number for each of such Persons.

We retain the right to ask for additional documentation.

### **Filing Requirements**

***Affidavit Requirement.*** We direct World Federation to support its responses with a notarized affidavit or declaration **made under penalty of perjury, signed and dated by an authorized director of World Federation with personal knowledge of the representations provided in the response to this LOI.** The affidavit or declaration **must verify the truth and accuracy of the information therein, state that all of the information requested by this LOI that is in World Federation's possession, custody, control, or knowledge has been produced, and state that any and all Documents provided in its responses are true and accurate copies of the original documents.** In addition to such general affidavit or declaration of the authorized representative described above, **if such Person (or any other affiant or declarant) is relying on the personal knowledge of any other individual rather than his or her own knowledge, and if multiple employees or representatives of World Federation contribute to the response, Licensee shall provide separate affidavits or declarations of each such Person with personal knowledge that identify clearly to which responses the affiant or declarant with such personal knowledge is attesting.** All declarations made under penalty of perjury, in lieu of an affidavit, must comply with 47 CFR § 1.16, and be substantially in the form set forth therein. Failure to support your responses in the form described could subject you to forfeiture.

***Delivery Requirements.*** World Federation shall send its response via e-mail to [alexander.sanjenis@fcc.gov](mailto:alexander.sanjenis@fcc.gov) and [joseph.cohen@fcc.gov](mailto:joseph.cohen@fcc.gov). It shall also send its response to the other applicants in NCE MX Group 95 at the e-mail addresses listed above. **The applicants in NCE MX Group 95 may submit a response within 15 days of the World Federation filing, with copies sent to the other applicants in the group via e-mail.**

### **Instructions**

***Format of Responses.*** The response must be organized in the same manner as the questions asked, *i.e.*, the response to Inquiry 1.a should be labeled as responsive to Inquiry 1.a, etc.

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declaration, the affidavit or declaration should provide the director's current address and the date of the director's move to that address.

<sup>37</sup> Lushomo Reply at Attach. While Lushomo states on page six of its petition that World Federation's website was created on August 23, 2022, the attachment that it references states that the website was created on August 24, 2022. *Id.* at 6, Attach.

***Method of Producing Documents.*** World Federation shall submit each requested Document in its entirety, even if only a portion of that Document is responsive to an inquiry or document request made herein, including all appendices, tables, or other attachments, and all other Documents referred to in the Document or attachments. World Federation shall not edit, cut, expunge, or otherwise take any action to modify any Document submitted in response to this LOI. In addition to any Document World Federation submits in response to any inquiry or document request, World Federation shall also submit all written materials necessary to understand any Document responsive to these inquiries.

***Identification of Documents.*** For each Document or statement submitted in response to the inquiries and document requests listed here, indicate, by number, to which inquiry or document request it is responsive and identify the persons from whose files the Document was retrieved. If any Document is not dated, state the date on which it was prepared. If any Document does not identify its authors or recipients, state, if known, the names of the authors or recipients. World Federation must identify with reasonable specificity all Documents provided in response to these inquiries and document requests.

***Prior Responses.*** If a Document responsive to any inquiry or document request made herein has already been provided to the Media Bureau during this or any other investigation, identify each such Document, and when and how it was produced to the Bureau.

***Documents No Longer Available.*** If a Document responsive to any Inquiry made herein existed but is no longer available, or if World Federation is unable for any reason to produce a Document responsive to any inquiry or document request, identify each such Document by author, recipient, date, title, and specific subject matter, and explain fully why the Document is no longer available or why World Federation is otherwise unable to produce it.

***Retention of Original Documents.*** With respect only to Documents responsive to the specific inquiries and document requests made herein and any other Documents relevant to those inquiries and document requests, World Federation is directed to retain the originals of those Documents for 60 months from the date of this LOI unless (a) World Federation is required to retain Documents for a longer period of time pursuant to a Commission order or rule; (b) World Federation is directed or informed by the Media Bureau in writing to retain such Documents for some shorter or longer period of time; or (c) the Bureau or the Commission releases an item on the subject of this investigation, including, but not limited to, a Notice of Apparent Liability for Forfeiture or an order disposing of the issues in the investigation, in which case, World Federation must retain all such Documents until the matter has been finally concluded by payment of any monetary penalty, satisfaction of all conditions, expiration of all possible appeals, conclusion of any enforcement action brought by the United States Department of Justice, or execution and implementation of a final settlement with the Commission or the Bureau.

***Continuing Nature of Inquiries.*** The specific Inquiries made herein are continuing in nature. World Federation is required to produce in the future any and all Documents and information that are responsive to the inquiries and document requests made herein but not initially produced at the time, date, and place specified herein. In this regard, World Federation must supplement its responses (a) if World Federation learns that, in some material respect, the Documents and information initially disclosed were incomplete or incorrect or (b) if additional responsive Documents or information are acquired by or become known to World Federation after the initial production. The requirement to update the record will continue for 60 months from the date of this LOI unless: (a) World Federation is required by another Commission order or rule to retain documents for a period longer than 60 months; (b) World Federation is directed or informed by the Media Bureau in writing that the obligation to update the record will continue for some shorter or longer period of time; or (c) the Bureau or the Commission releases an item on the

subject of this investigation including, but not limited to, a Notice of Apparent Liability for Forfeiture or an order disposing of the issues in the investigation, in which case the obligation to update the record will continue until the matter has been finally concluded by payment of any such monetary penalty, satisfaction of all conditions, expiration of all possible appeals, conclusion of any enforcement action brought by the United States Department of Justice, or execution and implementation of a final settlement with the Commission or the Bureau.

If the Media Bureau determines that World Federation has continued to act/acted in violation of the Act and/or the Commission's rules, any continued noncompliant conduct after the receipt of this LOI may subject World Federation to additional penalties.

**Construction.** The terms "any" and "all," "and" and "or," and "each" and "every" shall be construed inclusively to bring within the scope of the inquiries and document requests all information and Documents that might otherwise arguably be construed as outside the scope of the requests. Likewise, the singular of any word or defined term shall include the plural and the plural of any such word or defined term shall include the singular. The words "relating to" or "relate to" shall be construed to mean, whether directly or indirectly, in whole or in part constituting, containing, concerning, discussing, describing, analyzing, identifying, supporting, qualifying, confirming, contradicting, or stating.

**Confidentiality.** In addition to providing the requested information and documents, any request for confidentiality of certain information or documents must strictly comply with the requirements of section 0.459 of the Commission's rules,<sup>38</sup> including a statement of the reasons for withholding the materials from inspection. The request must include a schedule of the information or documents for which confidentiality is requested that states, individually as to each such item, the information required by section 0.459(b) of the Commission's rules including, but not limited to, identifying the specific information for which confidential treatment is sought; explaining the degree to which the information is commercial or financial, or contains a trade secret or is privileged; and explaining how disclosure of the information could result in substantial competitive harm.<sup>39</sup> Accordingly, a "blanket" request for confidentiality or a casual request, including simply stamping pages "confidential," will not be considered a proper request for confidentiality, and those materials will not be treated as confidential.<sup>40</sup>

**Claims of Privilege.** If World Federation withholds any information or documents under claim of privilege, it shall submit, together with any claim of privilege, a schedule of the items withheld that states, individually as to each such item: the numbered inquiry or document request to which each item responds and the type, title, specific subject matter and date of the item; and the specific grounds for claiming that the item is privileged.

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<sup>38</sup> See 47 CFR § 0.459.

<sup>39</sup> See 47 CFR § 0.459(b).

<sup>40</sup> See 47 CFR § 0.459(c). If World Federation withholds any information or documents under claim of privilege, it shall submit, together with any claim of privilege, a schedule of the items withheld that states, individually as to each such item: the numbered Inquiry to which each item responds and the type, title, specific subject matter and date of the item; the names, addresses, positions, and organizations of all authors and recipients of the item; and the specific grounds for claiming that the item is privileged.

## **Definitions**

For purposes of this LOI, the following definitions apply. The definitions in this section apply regardless of whether the first letter of the defined term appears in upper or lower case.

“Document” shall mean the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, emailed, text messaged, filmed, punched, computer-stored, electronically-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made.

“Florida LPFM Stations” shall mean the following low power FM station licensees:

- (i) Llamados Para Triunfar Inc., licensee of WVGK-LP, Miami, Florida (WVGK-LP);
- (ii) Radio Voz Mundial Inc., licensee of WPSI-LP, Miami, Florida (WPSI-LP);
- (iii) American Network Media Inc., licensee of WNGK-LP, Fort Lauderdale, Florida (WNGK-LP); and
- (iv) Multimedia America Inc., licensee of WQPN-LP, Miami, Florida.

“Person” shall mean any natural person or any non-natural person, including but not limited to a business, company, corporation, enterprise, institution, organization (educational, religious, or otherwise), partnership, proprietorship, or any other entity, whether for-profit or non-profit and whether of general or limited liability and all of such non-natural person’s advisers, agents, consultants, directors, employees, members, officers, owners, partners, principals, representatives, and any other persons working for or on behalf of the foregoing, whether in a paid or unpaid status.

“World Federation” shall mean World Federation of Pastors and Ministers of the Full Gospel, Inc., and any employees, time brokers, or agents, including consultants and any other persons working for or on behalf of World Federation at any time during the period covered by this LOI, whether in exchange for compensation or on a voluntary or other basis. Although this LOI refers to World Federation to collectively include each person or entity listed in this definition, any responses must specifically detail and distinguish between the actions or responsibilities of each entity or individual.

**ATTACHMENT B**

April 21, 2022, Amended Annual Report Filing Showing the Address of CIU

**2022 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# N13000002209

**Entity Name:** C.E.L.A. INTERNATIONAL UNIVERSITY INC.

**Current Principal Place of Business:**

2100 WEST 76 ST  
SUITE 304  
HIALEAH, FL 33016

**Current Mailing Address:**

P.O. BOX 669371  
MIAMI, FL 33166 US

**FEI Number:** 47-3460877

**Certificate of Status Desired:** Yes

**Name and Address of Current Registered Agent:**

KOST, NESTOR GSR.  
3710 ESTEPONA AV  
MIAMI, FL 33178 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

SIGNATURE: \_\_\_\_\_

Electronic Signature of Registered Agent

\_\_\_\_\_ Date

**Officer/Director Detail :**

Title	P	Title	S
Name	KOST, NESTOR GSR.	Name	CLAROS KOST, VILMA I
Address	3710 ESTEPONA AV	Address	3710 ESTEPONA AV
City-State-Zip:	MIAMI FL 33178	City-State-Zip:	MIAMI FL 33178
Title	TREASURER	Title	DIRECTOR
Name	KOST, IVAN G SR.	Name	CASTAÑEDA, FERMIN SR.
Address	965 WEST FLAGLER ST.	Address	7348 W 20 AV
City-State-Zip:	MIAMI FL 33130	City-State-Zip:	HIALEAH FL 33178

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

SIGNATURE: NÉSTOR G KOST

PRESIDENT

04/21/2022

\_\_\_\_\_ Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_ Date

## ATTACHMENT C

Phone Number of CIU<sup>41</sup>



<sup>41</sup> Screenshot of the CIU website, <https://celainternational.com> (last visited April 7, 2023).

**ATTACHMENT D**

August 23, 2022, Amended Annual Report Filings of World Federation and the Florida LPFM Stations

**2022 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL REPORT**

DOCUMENT# N12000006801

**Entity Name:** WORLD FEDERATION OF PASTORS AND MINISTERS OF THE FULL GOSPEL, INC.

**Current Principal Place of Business:**

2100 W 76 ST  
304  
HIALEAH , FL 33016

**Current Mailing Address:**

P.O. BOX 669371  
MIAMI, FL 33166

**FEI Number: 47-3824123**

**Certificate of Status Desired: No**

**Name and Address of Current Registered Agent:**

BLANCO , ISMELDA  
3710 ESTEPONA AV  
3  
MIAMI, FL 33178 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

SIGNATURE: ISMELDA BLANCO

08/23/2022

Electronic Signature of Registered Agent

Date

**Officer/Director Detail :**

Title P  
Name BLANCO , ISMELDA  
Address 1775 NORMANDY DR  
4  
City-State-Zip: MIAMI BEACH FL 33141

Title VP  
Name VALDES , SONIA  
Address 5400 SW 77 CT  
3 A  
City-State-Zip: MIAMI FL 33155

Title S  
Name BERRIOS , WALBERTO  
Address 2517 NW 21 ST TERR  
9  
City-State-Zip: MIAMI FL 33142

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

SIGNATURE: ISMELDA BLANCO

P

08/23/2022

Electronic Signature of Signing Officer/Director Detail

Date

**2022 FOREIGN NOT FOR PROFIT CORPORATION AMENDED ANNUAL REPORT**

DOCUMENT# F14000004995

**Entity Name:** MULTIMEDIA AMERICA INC.

**Current Principal Place of Business:**

7348 W 20 AV  
HIALEAH, FL 33016

**Current Mailing Address:**

7348 W 20 AV.  
HIALEAH, FL 33016 US

**FEI Number: 61-1746207**

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

RODRIGUEZ, ROSIO MORA  
7348 W 20 AV  
HIALEAH , FL 33016 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:** ROSIO MORA RODRIGUEZ

08/23/2022

Electronic Signature of Registered Agent

Date

**Officer/Director Detail :**

Title	C/P	Title	VP
Name	RODRIGUEZ, ROSIO MORA	Name	RODRIGUEZ, YOLANDA
Address	183 NE 166 ST	Address	7348 W 20 AV
City-State-Zip:	NORTH MIAMI FL 33162	City-State-Zip:	HIALEAH FL 33016

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** ROSIO RODRIGUEZ MORA

P

08/23/2022

Electronic Signature of Signing Officer/Director Detail

Date

**2022 FOREIGN NOT FOR PROFIT CORPORATION AMENDED ANNUAL REPORT**

DOCUMENT# F18000002007

**Entity Name:** AMERICAN NETWORK MEDIA, INC.

**Current Principal Place of Business:**

2100 W 76TH ST SUITE 307  
HIALEAH, FL 33016

**Current Mailing Address:**

PO BOX 669371  
MIAMI, FL 33166

**FEI Number:** NOT APPLICABLE

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

KOST, PAUL  
3710 ESTEPONA AVE  
DORAL, FL 33178 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

SIGNATURE: \_\_\_\_\_

Electronic Signature of Registered Agent

\_\_\_\_\_ Date

**Officer/Director Detail :**

Title            PRESIDENT

Title            SECRETARY

Name            ARVELO, NORMA E

Name            DIAZ, JENNIFER

Address        1334 SW 6TH ST APT 11

Address        13721 SW 173RD TERR.

City-State-Zip: MIAMI FL 33135

City-State-Zip: MIAMI FL 33177

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

SIGNATURE: NORMA ARVELO

PRESIDENT

08/23/2022

\_\_\_\_\_ Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_ Date

**2022 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL REPORT**

DOCUMENT# N05000004759

**Entity Name:** RADIO VOZ MUNDIAL INC

**Current Principal Place of Business:**

2100 WEST 76 ST.  
410  
HIALEAH, FL 33016

**Current Mailing Address:**

P.O. BOX 669371  
MIAMI, FL 33166 US

**FEI Number:** 20-2805543

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

KOST, NESTOR  
2100 WEST 76 ST.  
410  
HIALEAH, FL 33016 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:**

\_\_\_\_\_  
Electronic Signature of Registered Agent

\_\_\_\_\_  
Date

**Officer/Director Detail :**

Title            SECRETARY  
Name            KOST, NESTOR GABRIEL  
Address        2100 WEST 76 ST.  
                  410  
City-State-Zip: HIALEAH FL 33016

Title            PRESIDENT  
Name            KOST , PAUL  
Address        3710 ESTEPONA AV  
City-State-Zip: DORAL FL 33178

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** PAUL KOST

**PRESIDENT**

**08/23/2022**

\_\_\_\_\_  
Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_  
Date

**2022 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL REPORT**

DOCUMENT# N05000000444

**Entity Name:** LLAMADOS PARA TRIUNFAR INC

**Current Principal Place of Business:**

2100 WEST 76 ST  
SUITE 307  
HIALEAH, FL 33016

**Current Mailing Address:**

2100 WEST 76 ST.  
307  
HIALEAH, FL 33016 US

**FEI Number: 20-2160065**

**Certificate of Status Desired: No**

**Name and Address of Current Registered Agent:**

LETONA ZALAZAR, MARIELA A MS  
3480 NW 85 TH CT  
214  
DORAL, FL 33122 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:** MARIELA ANAITE LETONA ZALAZAR

08/23/2022

Electronic Signature of Registered Agent

Date

**Officer/Director Detail :**

Title VP  
Name LICONA, CARLOS SR.  
Address 2333 PONCE DE LEON BLVD  
630  
City-State-Zip: MIAMI FL 33134

Title PRESIDENT  
Name MARTINEZ, FELICIANO SR.  
Address 2100 WEST 76 ST  
SUITE 307  
City-State-Zip: HIALEAH FL 33016

Title VP  
Name CRIOLLO, KALININ SR.  
Address 4129 NW  
City-State-Zip: OPA LOCKA FL 33054

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** FELICIANO MARTINEZ

P

08/23/2022

Electronic Signature of Signing Officer/Director Detail

Date

**ATTACHMENT E**

Amended Annual Report Filings of World Federation, the Florida LPFM Stations, and CIU Showing  
Castaneda as a Director

**2022 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL REPORT**

DOCUMENT# N12000006801

**Entity Name:** WORLD FEDERATION OF PASTORS AND MINISTERS OF THE FULL GOSPEL, INC.

**Current Principal Place of Business:**

2100 W 76 ST  
304  
HIALEAH , FL 33016

**Current Mailing Address:**

P.O. BOX 669371  
MIAMI, FL 33166

**FEI Number: 47-3824123**

**Certificate of Status Desired: No**

**Name and Address of Current Registered Agent:**

BLANCO , ISMELDA  
3710 ESTEPONA AV  
3  
MIAMI, FL 33178 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE: ISMELDA BLANCO**

**05/06/2022**

Electronic Signature of Registered Agent

Date

**Officer/Director Detail :**

Title P  
Name BLANCO , ISMELDA  
Address 1775 NORMANDY DR  
4  
City-State-Zip: MIAMI BEACH FL 33141

Title VP  
Name VALDES , SONIA  
Address 5400 SW 77 CT  
3 A  
City-State-Zip: MIAMI FL 33155

Title S  
Name BERRIOS , WALBERTO  
Address 2517 NW 21 ST TERR  
9  
City-State-Zip: MIAMI FL 33142

Title DIRECTOR  
Name CASTAÑEDA, FERMIN SR.  
Address 7348 W 20TH AVE  
City-State-Zip: HIALEAH FL 33016

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE: SONIA VALDES**

**VP**

**05/06/2022**

Electronic Signature of Signing Officer/Director Detail

Date

**2022 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# N13000002209

**Entity Name:** C.E.L.A. INTERNATIONAL UNIVERSITY INC.

**Current Principal Place of Business:**

2100 WEST 76 ST  
SUITE 304  
HIALEAH, FL 33016

**Current Mailing Address:**

P.O. BOX 669371  
MIAMI, FL 33166 US

**FEI Number:** 47-3460877

**Certificate of Status Desired:** Yes

**Name and Address of Current Registered Agent:**

KOST, NESTOR GSR.  
3710 ESTEPONA AV  
MIAMI, FL 33178 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

SIGNATURE: \_\_\_\_\_

Electronic Signature of Registered Agent

\_\_\_\_\_ Date

**Officer/Director Detail :**

Title	P	Title	S
Name	KOST, NESTOR GSR.	Name	CLAROS KOST, VILMA I
Address	3710 ESTEPONA AV	Address	3710 ESTEPONA AV
City-State-Zip:	MIAMI FL 33178	City-State-Zip:	MIAMI FL 33178
Title	TREASURER	Title	DIRECTOR
Name	KOST, IVAN G SR.	Name	CASTAÑEDA, FERMIN SR.
Address	965 WEST FLAGLER ST.	Address	7348 W 20 AV
City-State-Zip:	MIAMI FL 33130	City-State-Zip:	HIALEAH FL 33178

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

SIGNATURE: NÉSTOR G KOST

PRESIDENT

04/21/2022

\_\_\_\_\_ Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_ Date

**2022 FOREIGN NOT FOR PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# F18000002007

**Entity Name:** AMERICAN NETWORK MEDIA, INC.

**Current Principal Place of Business:**

2100 W 76TH ST SUITE 307  
HIALEAH, FL 33016

**Current Mailing Address:**

PO BOX 669371  
MIAMI, FL 33166

**FEI Number:** NOT APPLICABLE

**Certificate of Status Desired:** Yes

**Name and Address of Current Registered Agent:**

KOST, PAUL  
3710 ESTEPONA AVE  
DORAL, FL 33178 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:** \_\_\_\_\_

Electronic Signature of Registered Agent

Date

**Officer/Director Detail :**

Title D  
Name ARVELO, NORMA E  
Address 1334 SW 6TH ST APT 11  
City-State-Zip: MIAMI FL 33135

Title P  
Name ARVELO, NORMA  
Address 5450 S STATE RD 7  
City-State-Zip: LAUDERDALE FL 33314

Title VP  
Name ARVELO, MORNA E  
Address 1334 SW 6TH ST APT 11  
City-State-Zip: MIAMI FL 33135

Title DIRECTOR  
Name CASTAÑEDA , FERMIN  
Address 7348 W 20 AV.  
City-State-Zip: HIALEAH FL 33016

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**SIGNATURE:** NORMA E ARVELO

P

04/21/2022

Electronic Signature of Signing Officer/Director Detail

Date

**2022 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# N05000000444

**Entity Name:** LLAMADOS PARA TRIUNFAR INC

**Current Principal Place of Business:**

2100 WEST 76 ST  
SUITE 307  
HIALEAH , FL 33016

**Current Mailing Address:**

2100 WEST 76 ST.  
307  
HIALEAH, FL 33016 US

**FEI Number:** 20-2160065

**Certificate of Status Desired:** Yes

**Name and Address of Current Registered Agent:**

LETONA ZALAZAR, MARIELA A MS  
3480 NW 85 TH CT  
214  
DORAL , FL 33122 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:** MARIELA ANAITE LETONA ZALAZAR

04/21/2022

Electronic Signature of Registered Agent

Date

**Officer/Director Detail :**

Title VP  
Name LICONA, CARLOS SR.  
Address 2333 PONCE DE LEON BLVD  
630  
City-State-Zip: MIAMI FL 33134

Title PRESIDENT  
Name MARTINEZ , FELICIANO SR.  
Address 2100 WEST 76 ST  
SUITE 307  
City-State-Zip: HIALEAH FL 33016

Title VP  
Name CRIOLLO, KALININ SR.  
Address 4129 NW  
City-State-Zip: OPA LOCKA FL 33054

Title DIRECTOR  
Name CASTAÑEDA, FERMIN  
Address 7348 W 20 AV  
City-State-Zip: HIALEAH FL 33016

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**SIGNATURE:** FELICIANO MARTINEZ

PRESIDENT

04/21/2022

Electronic Signature of Signing Officer/Director Detail

Date

**2022 FOREIGN NOT FOR PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# F14000004995

**Entity Name:** MULTIMEDIA AMERICA INC.

**Current Principal Place of Business:**

7348 W 20 AV  
HIALEAH, FL 33016

**Current Mailing Address:**

7348 W 20 AV.  
HIALEAH, FL 33016 US

**FEI Number: 61-1746207**

**Certificate of Status Desired: Yes**

**Name and Address of Current Registered Agent:**

RODRIGUEZ, ROSIO MORA  
7348 W 20 AV  
HIALEAH , FL 33016 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE: ROSIO MORA RODRIGUEZ**

**04/21/2022**

Electronic Signature of Registered Agent

Date

**Officer/Director Detail :**

Title C/P  
Name RODRIGUEZ, ROSIO MORA  
Address 183 NE 166 ST  
City-State-Zip: NORTH MIAMI FL 33162

Title VP  
Name RODRIGUEZ, YOLANDA  
Address 7348 W 20 AV  
City-State-Zip: HIALEAH FL 33016

Title DIRECTOR  
Name CASTAÑEDA , FERMIN  
Address 7348 W 20 AV  
City-State-Zip: DORAL FL 33016

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**SIGNATURE: ROSIO MORA RODRIGUEZ**

**P**

**04/21/2022**

Electronic Signature of Signing Officer/Director Detail

Date

**2022 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# N05000004759

**Entity Name:** RADIO VOZ MUNDIAL INC

**Current Principal Place of Business:**

2100 WEST 76 ST.  
410  
HIALEAH, FL 33016

**Current Mailing Address:**

P.O. BOX 669371  
MIAMI, FL 33166 US

**FEI Number:** 20-2805543

**Certificate of Status Desired:** Yes

**Name and Address of Current Registered Agent:**

KOST, NESTOR  
2100 WEST 76 ST.  
410  
HIALEAH, FL 33016 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:** \_\_\_\_\_

Electronic Signature of Registered Agent

Date

**Officer/Director Detail :**

Title SECRETARY  
Name KOST, NESTOR GABRIEL  
Address 2100 WEST 76 ST.  
410  
City-State-Zip: HIALEAH FL 33016

Title PRESIDENT  
Name KOST , PAUL  
Address 3710 ESTEPONA AV  
City-State-Zip: DORAL FL 33178

Title DIRECTOR  
Name CASTAÑEDA, FERMIN  
Address 7348 W 20 AV  
City-State-Zip: HIALEAH FL 33016

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**SIGNATURE:** NESTOR G KOST

P

04/21/2022

Electronic Signature of Signing Officer/Director Detail

Date