



Federal Communications Commission
Washington, D.C. 20554

June 4, 2024

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)

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).¹ The Media Bureau (Bureau) identified the World Federation Application as the tentative selectee of NCE MX Group 95.² Subsequently, Lushomo Health Education Centre (Lushomo) and New Beginnings Movement, Inc. (New Beginnings) each filed a Petition to Deny the World Federation Application (Lushomo Petition³ and New Beginnings Petition,⁴ respectively). World Federation filed an Opposition to the Lushomo Petition (Lushomo Opposition)⁵ and an Opposition to the New Beginnings Petition (New Beginnings Opposition).⁶ Lushomo filed a Reply (Lushomo Reply).⁷ The Bureau sent a letter of inquiry (LOI) to World Federation (First LOI),⁸ World Federation submitted a response (LOI Response),⁹ and Lushomo submitted comments to the LOI Response (Lushomo LOI Comments).¹⁰

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.¹¹ Specifically, the Bureau is investigating: (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. 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 LOI.

Background

Lushomo Petition. The Lushomo Petition argues that World Federation is part of a "consolidated enterprise" that includes four licensed low power FM (LPFM) stations in Florida (Florida LPFM Stations) and C.E.L.A. International University Inc. (CIU).¹² Lushomo alleges that World Federation has an

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

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

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

⁴ Pleading File No. 0000197396 (filed Aug. 10, 2022).

⁵ Pleading File No. 0000198292 (filed Aug. 24, 2022).

⁶ Pleading File No. 0000198291 (filed Aug. 24, 2022).

⁷ Pleading File No. 0000199483 (filed Sept. 6, 2022).

⁸ Letter from Albert Shuldiner, Chief, Audio Division, to World Federation, Application File No. 0000167179 (dated April 27, 2023) (First LOI).

⁹ Response of World Federation, Application File No. 0000167179 (dated May 30, 2023) (LOI Response).

¹⁰ Comments of Lushomo, Application File No. 0000167179 (dated June 14, 2023) (Lushomo LOI Comments).

¹¹ *See* 47 C.F.R. § 1.17.

¹² Lushomo Petition at 7. The Florida LPFM Stations are: (1) WVGK-LP, Miami, Florida, licensed to Llamados Para Triunfar Inc. (WVGK-LP); (2) WPSI-LP, Miami, Florida, licensed to Radio Voz Mundial Inc. (WPSI-LP); (3)

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.¹³ It bases this claim on World Federation’s connection to Fermin Castaneda (Castaneda), who is a former common director of CIU, the Florida LPFM Stations, and World Federation, as well as World Federation director Sonia Valdez (Valdez).¹⁴ 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 undisclosed real-party-[in]-interest.”¹⁵ Lushomo bases its allegation regarding Kost, in part, on information found on World Federation’s website.¹⁶

In the Lushomo Opposition, World Federation states that it “has no involvement” with CIU or the Florida LPFM Stations.¹⁷ 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, as attributable interests were not a factor in the selection.¹⁸ Regarding Kost, World Federation states that, while Kost “continues to serve as an advisor to the organization, he retains no control over the organization.”¹⁹ 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.²⁰

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.²¹ In addition, Lushomo states that World Federation does not adequately explain the ties between Kost, CIU, and World Federation.²² 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.²³

WNGK-LP, Fort Lauderdale, Florida, licensed to American Network Media Inc. (WNGK-LP); and (4) WQPN-LP, Miami, Florida, licensed to Multimedia America Inc.

¹³ *Id.* at 3-4; *see* 47 CFR § 73.860.

¹⁴ Lushomo states that, in a 2019 interview, Valdez claimed to be the commercial manager for the Florida LPFM Stations. Lushomo Petition at 7.

¹⁵ *Id.* at 2.

¹⁶ *Id.* at 5.

¹⁷ Lushomo Opposition at 7 n.4; Declaration of Ismelda Blanco, Attach. 16 to Lushomo Opposition and Attach. 1 to New Beginnings Opposition (Blanco Declaration).

¹⁸ Lushomo Opposition at 5.

¹⁹ *Id.* at 7.

²⁰ *Id.*

²¹ Lushomo Reply at 4.

²² *Id.* at 6-7.

²³ *Id.* at 6. The Lushomo Reply includes an attachment showing results from a search of the WHOIS database that

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.”²⁴

In the New Beginnings Opposition, World Federation states that “the identities of the principals named in the Application are accurate at this time.”²⁵ 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.”²⁶

First LOI. In the First LOI, the Bureau requested information from World Federation regarding: (1) World Federation’s alleged relationships with CIU, the Florida LPFM Stations, and Kost; (2) Castaneda’s involvement with World Federation, CIU, and the Florida LPFM Stations; (3) financial information; and (4) information regarding World Federation’s directors and website.²⁷

In the LOI Response, World Federation states that Kost, who is now deceased, “initiated the process needed for World Federation to file the Application, [which] included engaging the services of Maria Guel and her father.”²⁸ Furthermore, World Federation does not deny that Castaneda was simultaneously a director of World Federation, the Florida LPFM Stations, and CIU, but states that Castaneda did not coordinate work between these organizations.²⁹ World Federation also submits invoices from its attorney and engineer, and states that the invoices “are in the process of being paid.”³⁰ In addition, it states that the phone numbers it listed in the World Federation Application are incorrect,³¹ and acknowledges that its new website was created on or about the same day that it filed the Lushomo Opposition.³²

In the Lushomo LOI Comments, Lushomo states that Kost’s hiring of Maria Guel and her father, and the incorrect phone numbers on the World Federation Application, raise questions about who prepared the application.³³ It also states that World Federation’s acknowledgment that Castaneda was simultaneously a director of World Federation, the Florida LPFM Stations, and CIU is disqualifying because World Federation did not commit to divest the Florida LPFM Stations.³⁴ In addition, Lushomo questions World Federation’s financial qualifications because World Federation has not paid the invoices

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.

²⁴ New Beginnings Petition at 3.

²⁵ New Beginnings Opposition at 4.

²⁶ Blanco Declaration.

²⁷ *See* First LOI.

²⁸ LOI Response at 4.

²⁹ *Id.*

³⁰ *Id.* at 5-6.

³¹ *Id.* at 1.

³² *Id.* at 6.

³³ Lushomo LOI Comments at 1-2.

³⁴ *Id.* at 2.

associated with the preparation and filing of the World Federation Application.³⁵

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.³⁶ To knowingly or willfully make any false statement, or conceal any material fact in reply to this letter, is punishable by fine or imprisonment.³⁷ **Failure to respond appropriately to this letter constitutes a violation of the Act and rules.**³⁸ In addition, a failure to respond appropriately to this letter may result in **dismissal of the World Federation Application.**³⁹

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.

³⁵ Id.

³⁶ See 47 U.S.C. § 155(c)(3).

³⁷ See 18 U.S.C. § 1001; see also 47 CFR § 1.17.

³⁸ 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).

³⁹ 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. 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

Attachment

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

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

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

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

Lushomo Health Education Centre
c/o Mr. Donald E. Martin, Esq.
(sent by e-mail to: 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. Financial Qualifications. In the World Federation Application, World Federation certified “Yes” to indicate that “sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without revenue.” Provide the following information and documents to the extent that they were in existence as of the time the World Federation Application was filed:
 - a. All cost estimates, budgets, budget estimates and related calculations of the cost of constructing the proposed station and operating the station for the first three months of operation; and
 - b. All documents (including written and electronic documents such as text messages, emails, letters, and notes) that World Federation relied upon to certify that sufficient net liquid assets are on hand or are available from committed sources to construct and operate the station for the first three months of operation. To the extent that World Federation relied upon committed sources from a third party, provide a detailed description of the steps taken to obtain the financial commitment and a narrative description detailing the commitment obtained.
 - c. In the LOI Response, World Federation provides invoices from its attorney and engineer for services rendered after January 1, 2022, and states that “[l]egal fees, engineering fees, and consulting fees are in the process of being paid.”⁴⁰
 - i. Lack of Payment.
 1. Explain why no fees have been paid by World Federation to its attorney, engineer, or consultant in connection with the World Federation Application.
 - a. If World Federation lacks the funds to pay, explain how World Federation intends to obtain the required funds to pay its outstanding fees.
 2. Provide further details regarding World Federation’s statement that its legal, engineering, and consultant fees are “in the process of being paid,” including:

⁴⁰ LOI Response at 5-6.

- a. What process needs to occur for payment to take place;
 - b. The name of the specific entity or person that will pay the legal, engineering, and consulting fees; and
 - c. The date on which the legal, engineering, and consulting fees will be paid.
- ii. Consultant.
 1. Provide the name of World Federation’s consultant identified in the LOI Response.⁴¹
 2. Explain why the LOI Response did not include invoices from World Federation’s consultant.
 3. Provide copies of all invoices from World Federation’s consultant in connection with the World Federation Application.
 4. State whether World Federation’s consultant has paid for any legal, engineering, or other costs associated with the World Federation Application, and provide documentation for any such payments.
- iii. Attorney and Engineer Invoices.
 1. Explain why no invoices were provided for services rendered prior to January 1, 2022, including services related to the preparation and filing of the initial World Federation Application in November 2021.
 2. Provide copies of all invoices in connection with the World Federation Application for services rendered prior to January 1, 2022, including invoices sent to World Federation and World Federation’s consultant.
 3. Provide copies of all invoices sent to World Federation’s consultant in connection with the World Federation Application for services rendered after January 1, 2022.
- d. In the LOI Response, World Federation states that “Pastor Kost initiated the process needed for World Federation to file the Application, [which] included engaging the services of Maria Guel and her father for assistance in . . . other matters, such as subcontracting and engaging the services of Dan J. Alpert and Darryl Delawder for the preparation of the World Federation Application.”⁴²
 - i. Provide the name of Maria Guel’s father, and the name of any entity associated with Maria Guel and her father that was hired by World Federation to assist with the World Federation Application.
 - ii. Provide invoices from all subcontractors of Maria Guel, her father, or any entity associated with these individuals in connection with the World Federation Application.

⁴¹ LOI Response at 5-6.

⁴² LOI Response at 4.

1. If Mr. Alpert and Mr. DeLawder are subcontractors of Maria Guel, her father, or any entity associated with these individuals, explain why the invoices from Mr. Alpert and Mr. DeLawder are addressed to World Federation.
 - iii. Have any payments been made from Maria Guel, her father, or any entity associated with these individuals to Mr. Alpert, Mr. DeLawder, or any other individual or entity in connection with the World Federation Application? If yes, provide documentation for any such payments.
2. Reasonable Assurance of Site Availability. In the World Federation Application, World Federation certified “Yes” to having reasonable assurance of site availability. Provide the following information and documents to the extent that they were in existence as of the time the World Federation Application was filed:
 - a. All documents (including written and electronic documents such as text messages, emails, letters, and notes) in the possession of World Federation and its agents relating to the availability of the proposed site for the World Federation Application; and
 - b. The name, telephone number, and email address of each person contacted by World Federation and its agents in connection with the availability of the proposed site for the World Federation Application, and in each case specify that person’s connection to the proposed site, and provide a detailed description of the steps taken to obtain reasonable assurance of site availability at the coordinates and tower specified in the World Federation Application, and a narrative description of such reasonable assurance obtained.
3. In the LOI Response, World Federation states that its phone number listed on the World Federation Application, 786-656-9130, is incorrect.⁴³
 - a. Provide World Federation’s phone number.
 - b. Explain why the phone number on the World Federation Application was not corrected.
 - c. State who compiled the information included in the Applicant Information and Parties to the Application sections of the World Federation Application.
 - d. State whether Ismelda Blanco reviewed the World Federation Application, including each of its amendments, and why she certified that the phone number was correct.
 - i. If Ismelda Blanco did not review the World Federation Application, including each of its amendments, state who reviewed it on behalf of World Federation.
 - e. State when each of World Federation’s directors, as listed on the World Federation Application, became involved in the World Federation Application, and their roles pertaining to the Application.

⁴³ LOI Response at 1.

4. In the LOI Response, Ismelda Blanco declares that she does not have a phone number.⁴⁴ However, in the World Federation Application, she certified that her phone number is 786-656-9130.⁴⁵
 - a. State whether the information pertaining to Ismelda Blanco’s phone number in the LOI Response is correct, or if the information in the World Federation Application is correct.
 - i. If the information in the LOI Response is correct, state why Ismelda Blanco certified in the World Federation Application that her phone number was correct.
 - ii. If the information in the World Federation Application is correct, state why Ismelda Blanco declared in the LOI Response that she does not have a phone number.
5. Explain why World Federation’s April 29, 2024, Reinstatement filing with the Florida Department of State lists different officers/directors than those listed on the World Federation Application.⁴⁶
6. World Federation states that, “World Federation has no involvement with CIU . . . [and] CIU and World Federation do not share any officers, directors, or personnel.”⁴⁷
 - a. Explain why Vilma Claros-Kost and Ivan Kost are currently officers/directors of both CIU and World Federation.⁴⁸
 - b. Explain why Ivan Kost’s address,⁴⁹ as listed on World Federation’s Reinstatement filing, is also the address of CIU.⁵⁰
7. World Federation states that it has “no involvement” with the Florida LPFM Stations.⁵¹
 - a. Explain why Vilma Claros-Kost was simultaneously an officer/director of WVGK-LP and World Federation between April 29, 2024, and May 14, 2024.⁵²

⁴⁴ LOI Response Attach. 5.

⁴⁵ World Federation Application, Parties to the Application.

⁴⁶ See Florida Department of State, Division of Corporations, <https://dos.fl.gov/sunbiz/search> (last visited May 30, 2024) (FL SOS Website). The Reinstatement filing states that Vilma Claros-Kost and Ivan Kost are World Federation’s officers/directors. These individuals are not listed as officers or directors on the World Federation Application.

⁴⁷ LOI Response at 3.

⁴⁸ See FL SOS Website.

⁴⁹ The address is 7318 W 20th Ave, Hialeah, Florida.

⁵⁰ See C.E.L.A. International University Inc., Contacto, <https://www.celauniversity.com> (last visited May 30, 2024).

⁵¹ Lushomo Opposition at 7 n.4; Blanco Declaration.

⁵² See FL SOS Website. Vilma Claros-Kost was listed as an officer/director on WVGK-LP’s April 17, 2024, Reinstatement filing, and removed as director on its May 14, 2024, Amended Annual Report filing. She was also listed as an officer/director on World Federation’s April 29, 2024, Reinstatement filing.

- b. Explain why Paul Joshua Kost was an officer/director of WPSI-LP at the same time that he was involved with the World Federation Application.⁵³
8. Vilma Claros-Kost.
 - a. Provide a complete chronology of Vilma Claros-Kost's involvement with World Federation, including the dates during which she has served as an officer and/or director.
 - b. Provide a description of Vilma Claros-Kost's involvement with World Federation and her duties as an officer and/or member of its board, including the percentage of voting interest she holds.
 - c. Describe in detail Vilma Claros-Kost's past and current relationship with World Federation, CIU, WVGK-LP, and the other three Florida LPFM Stations.
 - d. State whether Vilma Claros-Kost has a familial or other relationship to Ivan Kost, Paul Joshua Kost, and/or Nestor Gabriel Kost, and describe any such relationship.
9. Ivan Kost.
 - a. Provide a complete chronology of Ivan Kost's involvement with World Federation, including the dates during which he has served as an officer and/or director.
 - b. Provide a description of Ivan Kost's involvement with World Federation and his duties as an officer and/or member of its board, including the percentage of voting interest he holds.
 - c. Describe in detail Ivan Kost's past and current relationship with World Federation, CIU, and the Florida LPFM Stations.
 - d. State whether Ivan Kost has a familial or other relationship to Vilma Claros-Kost, Paul Joshua Kost, and/or Nestor Gabriel Kost, and describe any such relationship.
10. Paul Joshua Kost.
 - a. Provide a complete chronology of Paul Joshua Kost's involvement with World Federation, including the dates during which he has served as an officer, advisor, and/or director.
 - b. Provide a complete explanation of Paul Joshua Kost's involvement with the World Federation Application.
 - c. Provide all Documents, including emails, relating to Paul Joshua Kost's involvement with the World Federation Application.
 - d. For the invoices provided in the LOI Response from the Law Office of Dan J. Alpert to World Federation, specify which line items for services rendered involved communication with Paul Joshua Kost.

⁵³ See March 16, 2023, invoice from the Law Office of Dan J. Alpert to World Federation, Attach. 4 to LOI Response ("1/25/2023 review World Federation applications with Joshua"); see also FL SOS Website, Aug. 23, 2022, Radio Voz Mundial Inc., Amended Annual Report (listing Paul Kost as President).

- e. Provide a complete chronology of Paul Joshua Kost’s communications with the Law Office of Dan J. Alpert regarding the World Federation Application.
 - f. For the invoices provided in the LOI Response from DeLawder Communications, Inc. to World Federation, specify which line items for services rendered involved communication with Paul Joshua Kost.
 - g. Provide a complete chronology of Paul Joshua Kost’s communications with DeLawder Communications, Inc. regarding the World Federation Application.
 - h. Provide a complete chronology of Paul Joshua Kost’s communications with Maria Guel, her father, or any entity associated with Maria Guel and her father regarding the World Federation Application.
 - i. For any invoices provided in response to this LOI, specify which line items for services rendered involved communication with Paul Joshua Kost.
 - j. Describe in detail Paul Joshua Kost’s past and current relationship with World Federation, CIU, WPSI-LP, and the other Florida LPFM Stations.
 - k. Describe Paul Joshua Kost’s role as the registered agent of WVGK-LP, WNGK-LP, and WPSI-LP, and his role as President of WPSI-LP.⁵⁴
 - l. State whether Paul Joshua Kost has a familial or other relationship to Vilma Claros-Kost, Ivan Kost, and/or Nestor Gabriel Kost, and describe any such relationship.
11. State whether World Federation’s board of directors met at any point between October 31, 2021,⁵⁵ and the date of this LOI. If it has, provide the minutes of such meetings and the dates on which they occurred.
12. World Federation states in the LOI Response that it is “in the process of obtaining the minutes for [its] 2022 [board] meeting.”⁵⁶
- a. State whether the minutes of World Federation’s 2022 board meeting have been obtained and, if not, why such minutes were not obtainable.
13. 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**

⁵⁴ See FL SOS Website.

⁵⁵ October 30, 2021, is the date of World Federation’s 2021 board meeting, the last meeting for which board meeting minutes have been provided.

⁵⁶ LOI Response at 5.

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,**

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,⁵⁷ 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.⁵⁸ 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.⁵⁹

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

⁵⁷ See 47 CFR § 0.459.

⁵⁸ See 47 CFR § 0.459(b).

⁵⁹ 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.

responds and the type, title, specific subject matter and date 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 stations:

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

“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.