

**TRINITY CHRISTIAN CENTER OF
SANTA ANA, INC., D/B/A TRINITY
BROADCASTING NETWORK
FCC FORM 314
SECTION III, QUESTION 18**

**EXHIBIT 18
ADVERSE FINDINGS DISCLOSURE**

During the proceedings for LPTV/Translator Television Auction 81 an issue arose as to whether Trinity Broadcasting Network (“Trinity”) may have breached the anti-collusion rule (FCC Rule 1.2105(c)) (*see*, September 13, 2005 letter to Colby M. May, DA 05-2445). The concern arises out of the fact that Trinity shares common officers and directors with another applicant in Auction 81, National Minority TV, Inc. (“NMTV”).

Trinity and NMTV fully disclosed that they share directors and officers in their Auction 81 applications (and since approval of BTCCT-20030326AAD-AAZ & ABA-ABG, they have shared a controlling number of directors and officers). Applicants who share common directors or officers are subject to Rule 1.2105(c). However, such applicants may appropriately share auction bidding plans and information with one another if they have a technical “bidding agreement.” Trinity and NMTV, which share a controlling number of directors and officers, did not have a “bidding agreement” and Trinity noted this fact to the Commission in an Amended Form 175 filing made on August 12, 2005 (File No. 0810943064). It seems apparent, however, that in such circumstances where the same individuals are principals (in control) of separate organizations they nevertheless constitute a disclosed “bidder agreement” circumstance, which would permit the sharing of bidder information under Rule 1.2105(c).

Regardless, to insure that not even an appearance of impermissible collusion existed, neither Trinity nor NMTV participated in Auction 81. In fact, more than a month before the auction, on August 12, 2005, Trinity filed a dismissal notice with the Commission for virtually all of its Auction 81 applications, including the two MX groupings where Trinity and NMTV had competing applications (Auction 81 MX Groups 82 and 138). NMTV filed a similar notice on September 6, 2005. Trinity believes that the dismissal of the applications to which the anti-collusion rule applied, and not participating in Auction 81, voided any meaningful concern regarding application of Rule 1.2105(c) in this context.

Trinity is providing this notice to insure the Commission is appropriately aware of this matter as it processes this assignment application. This disclosure has been provided in applicable renewal applications, and those applications have been granted in the regular course, *e.g.*, KDOR-TV, Bartlesville, OK (BRCT-20060131AZD), KTBO-TV, Oklahoma City, OK (BRCT-20060131AHC), K33GU, St. Louis, MO (BRTT-20050919ACA), K22HG, St. Charles, MO (BRTT-20050919ABY), K16FE, Rolla, MO (BRTT-20050919ABW), K42AM, Ottumwa, IA (BRTT-20050920ABK), K17ET, Cedar Rapids, IA (BRTT-20050915ACX), K54HA, Albert Lea, MN (BRTT-20051122AGF), K58CM, Duluth, MN (BRTT-20051122ADR), K25IA, Minneapolis, MN (BRTT-20051122ABT), K43HN, Dodge City, KS (BRTT-20060126ANO), K39FW, Garden City, KS (BRTT-20060126ANX), K54GC, Independence, KS (BRTT-20060126AQP), K15CN, Salina, KS (BRTT-20060126AIA), K53DW, Great Falls, MT (BRTT-20051123ADP), and K26CF, Ogallala, NE (BRTT-20060127ACD).