

EXHIBIT 19

Alien Ownership and Control

Halyard Capital Fund, LP (“Halyard”) holds over 50.1 percent of the Senior Subordinated Debt Interests in the licensee, Superior Broadcasting of Denver, LLC (“Superior”). Under terms of the proposed ownership structure, Halyard would appoint one member of the five-member Board of Directors. Halyard is ultimately controlled by the Bank of Montreal, a publicly traded Canadian corporation. In general, each of the five Directors gets one vote on matters requiring a vote of the Board of Directors. The Director appointed by Halyard (who is a U.S. citizen) will not have more than one vote out of five on the Board of Directors. As such, Halyard would control no more than 20 percent of the vote of the Board of Directors in compliance with the Commission’s foreign ownership rules.

Because less than 0.5 percent of the equity interests in Superior are held by foreign entities and Halyard does not hold any equity interests in Superior, the parties submit that the proposed ownership and control structure of Superior is in compliance with the Commission’s foreign ownership rules.