



(REFERENCE COPY - Not for submission)

# Commercial Broadcast Stations Biennial Ownership Report (FCC Form 323)

File Number: **0000041873** | Submit Date: **2018-02-12** | FRN: **0014110878**

Purpose: **Commercial Broadcast Stations Biennial Ownership Report** | Status: **Received** | Status Date: **02/12/2018**

Filing Status: **Active**

## Section I - General Information

### 1. Respondent

FRN	Entity Name
0027227529	Ronald J. Gordon Irrevocable Trust

Street Address	City (and Country if non U.S. address)	State ("NA" if non-U.S. address)	Zip Code	Phone	Email
2000 North 14th Street Suite 400	Arlington	VA	22201	+1 (703) 528-5656	rgordon@zgsgroup.com

### 2. Contact Representative

Name	Organization
David M. Silverman, Esq.	Davis Wright Tremaine LLP

Street Address	City (and Country if non U.S. address)	State	Zip Code	Phone	Email
1919 Pennsylvania Ave., N.W. Suite 800	Washington	DC	20006-3401	+1 (202) 973-4261	DavidSilverman@dwt.com

### 3. Application Filing Fee

Not Applicable

### 4. Nature of Respondent

(a) Provide the following information about the Respondent:	
Relationship to stations/permits	Entity required to file a Form 323 because it holds an attributable interest in one or more Licensees
Nature of Respondent	Other Trust

(b) Provide the following information about this report:	
Purpose	Biennial
"As of" date	10/01/2017  When filing a biennial ownership report or validating and resubmitting a prior biennial ownership report, this date must be Oct. 1 of the year in which this report is filed.

**5. Licensee(s)  
and Station(s)**

Respondent is filing this report to cover the following Licensee(s) and station(s):

Licensee/Permittee Name	FRN
ZGS Hartford, Inc.	0010070225

Fac. ID No.	Call Sign	City	State	Service
10153	WRDM-CD	HARTFORD	CT	DCA
10154	WDMR-LD	SPRINGFIELD	MA	LD

Licensee/Permittee Name	FRN
ZGS Radio, Inc.	0005005772

Fac. ID No.	Call Sign	City	State	Service
28279	WILC	LAUREL	MD	AM

Licensee/Permittee Name	FRN
ZGS Fort Myers-Naples, Inc.	0011337300

Fac. ID No.	Call Sign	City	State	Service
58261	WWDT-CD	NAPLES	FL	DC

Licensee/Permittee Name	FRN
ZGS Broadcasting of Orlando, Inc.	0011198512

Fac. ID No.	Call Sign	City	State	Service
10073	WTMO-CD	ORLANDO	FL	DC
61702	WKME-CD	KISSIMMEE	FL	DC
71238	WMVJ-CD	MELBOURNE	FL	DC

Licensee/Permittee Name	FRN
Onda Capital, Inc.	0011007515

Fac. ID No.	Call Sign	City	State	Service
50347	WZDC-CD	WASHINGTON	DC	DCA
68490	WZTD-LD	RICHMOND	VA	LD

Licensee/Permittee Name	FRN
ZGS Providence, Inc.	0010070522

Fac. ID No.	Call Sign	City	State	Service
70184	WRIW-CD	PROVIDENCE	RI	DCA

Licensee/Permittee Name	FRN
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ZGS Television of Tampa, Inc.	0011214186
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Fac. ID No.	Call Sign	City	State	Service
74559	WRMD-CD	TAMPA	FL	DC

Licensee/Permittee Name	FRN
ZGS El Paso Television LP	0019452598

Fac. ID No.	Call Sign	City	State	Service
36916	KTDO	LAS CRUCES	NM	DT
36919	KTDO-LP	EL PASO	TX	TX

Licensee/Permittee Name	FRN
ZGS Raleigh, Inc.	0016833139

Fac. ID No.	Call Sign	City	State	Service
41095	WZGS-CD	RALEIGH	NC	DCA

## Section II – Biennial Ownership Information

### 1. 47 C.F.R. Section 73.3613 Documents

Licensee Respondents that hold authorizations for one or more full power television, AM, and/or FM stations should list all contracts and other instruments required to be filed pursuant to 47 C.F.R. Section 73.3613 for the facility or facilities listed on this report. If the agreement is an attributable Local Marketing Agreement (LMA), an attributable Joint Sales Agreement (JSA), or a network affiliation agreement, check the appropriate box. Otherwise, select "Other." Non-Licensee Respondents, as well as Licensee Respondents that only hold authorizations for Class A television and/or low power television stations, should select "Not Applicable" in response to this question.

Not Applicable.

### 2. Ownership Interests

**(a) Ownership Interests.** This Question requires Respondents to enter detailed information about ownership interests by generating a series of subforms. Answer each question on each subform. The first subform listing should be for the Respondent itself. If the Respondent is not a natural person, also list each of the officers, directors, stockholders, non-insulated partners, non-insulated members, and any other persons or entities with a direct attributable interest in the Respondent pursuant to the standards set forth in 47 C.F.R. Section 73.3555. (A "direct" interest is one that is not held through any intervening companies or entities.) List each interest holder with a direct attributable interest in the Respondent separately.

Leave the percentage of total assets (Equity Debt Plus) field blank for an interest holder unless that interest holder has an attributable interest in the Respondent solely on the basis of the Commission's Equity Debt Plus attribution standard, 47 C.F.R. Section 73.3555, Note 2(i).

In the case of vertical or indirect ownership structures, list only those interests in the Respondent that also represent an attributable interest in the Licensee(s) for which the report is being submitted.

Entities that are part of an organizational structure that includes holding companies or other forms of indirect ownership must file separate ownership reports. In such a structure do not report, or file a separate report for, any interest holder that does not have an attributable interest in the Licensee(s) for which the report is being submitted.

Please see the Instructions for further detail concerning interests that must be reported in response to this question.

The Respondent must provide an FCC Registration Number for each interest holder reported in response to this question. Please see the Instructions for detailed information and guidance concerning this requirement.

Ownership Information	
FRN	0027227529

<b>Entity Name</b>	Ronald J. Gordon Irrevocable Trust		
<b>Address</b>	<b>PO Box</b>		
	<b>Street 1</b>	2000 North 14th Street	
	<b>Street 2</b>	Suite 400	
	<b>City</b>	Arlington	
	<b>State ("NA" if non-U.S. address)</b>	VA	
	<b>Zip/Postal Code</b>	22201	
	<b>Country (if non-U.S. address)</b>	United States	
<b>Listing Type</b>	Respondent		
<b>Positional Interests</b> (check all that apply)	Respondent		
<b>Tribal Nation or Tribal Entity</b>	Interest holder is not a Tribal nation or Tribal entity		
<b>Interest Percentages</b> (enter percentage values from 0.0 to 100.0)	<b>Voting</b>	0.0%	<b>Jointly Held?</b> No
	<b>Equity</b>	0.0%	
	<b>Total assets (Equity Debt Plus)</b>	0.0%	
<b>Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?</b>			No

Ownership Information			
<b>FRN</b>	0019990589		
<b>Name</b>	Peter Housman		
<b>Address</b>	<b>PO Box</b>		
	<b>Street 1</b>	2000 North 14th Street	
	<b>Street 2</b>	Suite 400	
	<b>City</b>	Arlington	
	<b>State ("NA" if non-U.S. address)</b>	VA	
	<b>Zip/Postal Code</b>	22201	
	<b>Country (if non-U.S. address)</b>	United States	
<b>Listing Type</b>	Other Interest Holder		
<b>Positional Interests</b> (check all that apply)	Other - Trustee		
<b>Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)</b>	<b>Citizenship</b>	US	
	<b>Gender</b>	Male	
	<b>Ethnicity</b>	Not Hispanic or Latino	

	<b>Race</b>	White	
<b>Interest Percentages</b> (enter percentage values from 0.0 to 100.0)	<b>Voting</b>	100.0%	<b>Jointly Held?</b> Yes
	<b>Equity</b>	0.0%	
	<b>Total assets (Equity Debt Plus)</b>	0.0%	
<b>Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?</b>			No

<b>Ownership Information</b>			
<b>FRN</b>	9990123010		
<b>Name</b>	Katherine C. Gordon		
<b>Address</b>	<b>PO Box</b>		
	<b>Street 1</b>	2000 North 14th Street	
	<b>Street 2</b>	Suite 400	
	<b>City</b>	Arlington	
	<b>State ("NA" if non-U.S. address)</b>	VA	
	<b>Zip/Postal Code</b>	22201	
	<b>Country (if non-U.S. address)</b>	United States	
<b>Listing Type</b>	Other Interest Holder		
<b>Positional Interests</b> (check all that apply)	Other - Trustee		
<b>Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)</b>	<b>Citizenship</b>	US	
	<b>Gender</b>	Female	
	<b>Ethnicity</b>	Not Hispanic or Latino	
	<b>Race</b>	White	
<b>Interest Percentages</b> (enter percentage values from 0.0 to 100.0)	<b>Voting</b>	100.0%	<b>Jointly Held?</b> Yes
	<b>Equity</b>	0.0%	
	<b>Total assets (Equity Debt Plus)</b>	0.0%	
<b>Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?</b>			No

<b>(b) Respondent certifies that any interests, including equity, financial, or voting interests, not reported in this filing are non-attributable.</b> If "No," submit as an exhibit an explanation.	Yes
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<p><b>(c) Does the Respondent or any reported interest holder hold an attributable interest in any newspaper entities in the same market as any station for which this report is filed, as defined in 47 C.F.R. Section 73.3555?</b></p> <p>If "Yes," provide information describing the interest(s), using EITHER the subform OR the spreadsheet option below. Respondents with a large number (50 or more) of entries to submit should use the spreadsheet option.</p> <p>NOTE: Spreadsheets must be submitted in a special XML Spreadsheet format with the appropriate structure that is specified in the documentation. For instructions on how to use the spreadsheet option to complete this question (including templates to start with), please <a href="#">Click Here</a>.</p> <p>If using the subform, leave the percentage of total assets (Equity Debt Plus) field blank for an interest holder unless that interest holder has an attributable interest in the newspaper entity solely on the basis of the Commission's Equity Debt Plus attribution standard, 47 C.F.R. Section 73.3555, Note 2(i). If using an XML Spreadsheet, enter "NA" into the percentage of total assets (Equity Debt Plus) field for an interest holder unless that interest holder has an attributable interest in the newspaper entity solely on the basis of the Commission's Equity Debt Plus attribution standard.</p> <p>The Respondent must provide an FCC Registration Number for each interest holder reported in response to this question. Please see the Instructions for detailed information and guidance concerning this requirement.</p>	<p>No</p>
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<p><b>(d) Are any of the individuals listed as an attributable interest holder in the Respondent married to each other or related to each other as parentchild or as siblings?</b></p> <p>If "Yes," provide the following information for each such the relationship.</p>	<p>No</p>
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<p><b>(e) Is Respondent seeking an attribution exemption for any officer or director with duties wholly unrelated to the Licensee(s)?</b></p> <p>If "Yes," complete the information in the required fields and submit an Exhibit fully describing that individual's duties and responsibilities, and explaining why that individual should not be attributed an interest.</p>	<p>No</p>
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**Certification**

Section	Question	Response
<p><b>Authorized Party to Sign</b></p>	<p>WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND /OR REVOCATION OF ANY STATION LICENSE --OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).</p>	

**Certification**

I certify that I have examined this report and that to the best of my knowledge and belief, all statements in this report are true, correct and complete.

Official Title: **Trustee**  
Exact Legal Title or Name of Respondent:  
**Ronald J. Gordon Irrevocable Trust**  
Name: **Peter Housman**  
Phone: **7035285656**

02/12/2018