



(REFERENCE COPY - Not for submission)

Commercial Broadcast Stations Biennial
Ownership Report (FCC Form 323)

File Number: 0000102073 | Submit Date: 2020-01-30 | FRN: 0004999868

Purpose: Commercial Broadcast Stations Biennial Ownership Report | Status: Received | Status Date: 01/30/2020

Filing Status: Active

Section I - General Information

1. Respondent

FRN		Entity Name			
0004999868		KSOP, Inc.			

Street Address	City (and Country if non U.S. address)	State ("NA" if non-U.S. address)	Zip Code	Phone	Email
P.O. Box 25548	Salt Lake City	UT	84125	+1 (801) 972-1043	don.hilton@me.com

2. Contact Representative

Name		Organization			
Gregory L. Masters		Wiley			

Street Address	City (and Country if non U.S. address)	State	Zip Code	Phone	Email
1776 K Street NW	Washington	DC	20006	+1 (202) 719-7370	gmasters@wiley.law

3. Application Filing Fee

Question	Response
Is this application being submitted without a filing fee?	No

Fees

Application Type	Form Number	Fee Code	Quantity	Fee Amount	Subtotal
Biennial	Form 323	MAR	2	95	\$140.00
				Total	\$140.00

4. Nature of Respondent

(a) Provide the following information about the Respondent:

Relationship to stations/permits	Licensee
Nature of Respondent	For-profit corporation

(b) Provide the following information about this report:

Purpose	Biennial
"As of" date	10/01/2019 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
KSOP, Inc.	0004999868

Fac. ID No.	Call Sign	City	State	Service
35626	KSOP	SOUTH SALT LAKE	UT	AM
35629	KSOP-FM	SALT LAKE CITY	UT	FM

Section II – Biennial Ownership Information

1. 47 C.F.R. Section 73.3613 and Other 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 set forth in 47 C.F.R. Section 73.3613(a) through (c) for the facility or facilities listed on this report. In addition, attributable Local Marketing Agreements (LMAs) and attributable Joint Sales Agreements (JSAs) must be disclosed by the licensee of the brokering station on its ownership report. If the agreement is an attributable LMA, an attributable 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.

Document Information

Description of contract or instrument	Articles of Incorporation
Parties to contract or instrument	State of Utah
Date of execution	11/1965
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Articles of incorporation

Document Information	
Description of contract or instrument	Bylaws
Parties to contract or instrument	N/A
Date of execution	11/1965
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Bylaws

Document Information	
Description of contract or instrument	Agreement Restricting Sale of Stock
Parties to contract or instrument	Incorporators
Date of execution	11/1965
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Agreement restricting sale of stock

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Greg and Luana Hilton
Date of execution	12/1978
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Don and Luana Hilton
Date of execution	12/1980
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Greg and Luana Hilton
Date of execution	12/1983
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
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Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Don and Luana Hilton
Date of execution	12/1983
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Don Hilton and Elva Wahlquist
Date of execution	08/1986
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Greg Hilton and the Estate of Lyle Wahlquist
Date of execution	08/1986
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Greg and Henry Hilton
Date of execution	07/1992
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Greg and Henry Hilton
Date of execution	12/1992
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement

Parties to contract or instrument	Greg and Henry Hilton
Date of execution	01/1993
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Don and Henry Hilton
Date of execution	12/1992
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Don and Henry Hilton
Date of execution	01/1993
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Greg and Henry Hilton
Date of execution	01/1994
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Don and Henry Hilton
Date of execution	01/1994
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Greg and Henry Hilton

Date of execution	12/1995
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Greg and Henry Hilton
Date of execution	01/1996
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Don and Henry Hilton
Date of execution	12/1995
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Stock Agreement
Parties to contract or instrument	Don and Henry Hilton
Date of execution	01/1996
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock agreement

Document Information	
Description of contract or instrument	Resolution of the Board of Directors
Parties to contract or instrument	Shareholders
Date of execution	04/1999
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Board resolution

Document Information	
Description of contract or instrument	Stock Power and Transfer Agreement
Parties to contract or instrument	Shareholders and the Estate of M. Henry Hilton, Kathy Lavalley and Don E. Hilton as Personal Representatives
Date of execution	07/2011

Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock power and transfer agreement

Document Information	
Description of contract or instrument	Stock Power and Transfer Agreement
Parties to contract or instrument	Estate of Gregory K. Hilton and Trust for Kimberly Athena Hilton
Date of execution	08/2010
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock power and transfer agreement

Document Information	
Description of contract or instrument	Stock Power and Transfer Agreement
Parties to contract or instrument	Trust for Kimberly Athena Hilton and Kimberly A. Thorne Inheritance Trust
Date of execution	08/2019
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock power and transfer agreement

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	0004999868	
Entity Name	KSOP, Inc.	
Address	PO Box	
	Street 1	P.O. Box 25548
	Street 2	

	<div>City</div> <div>Salt Lake City</div>		
	<div>State ("NA" if non-U.S. address)</div> <div>UT</div>		
	<div>Zip/Postal Code</div> <div>84125</div>		
	<div>Country (if non-U.S. address)</div> <div>United States</div>		
<div>Listing Type</div>	<div>Respondent</div>		
<div>Positional Interests</div> <div>(check all that apply)</div>	<div>Respondent</div>		
<div>Tribal Nation or Tribal Entity</div>	<div>Interest holder is not a Tribal nation or Tribal entity</div>		
<div>Interest Percentages</div> <div>(enter percentage values from 0.0 to 100.0)</div>	<div>Voting</div> <div>0.0%</div> <div>Jointly Held?</div> <div>No</div>		
	<div>Equity</div> <div>0.0%</div>		
	<div>Total assets (Equity Debt Plus)</div> <div>0.0%</div>		
<div>Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?</div>			<div>No</div>

Ownership Information					
<div>FRN</div>	<div>0019264126</div>				
<div>Name</div>	<div>Don Hilton</div>				
<div>Address</div>	<div>PO Box</div>				
	<div>Street 1</div>	<div>7511 Casa Blanca Drive</div>			
	<div>Street 2</div>				
	<div>City</div>	<div>Midvale</div>			
	<div>State ("NA" if non-U.S. address)</div>	<div>UT</div>			
	<div>Zip/Postal Code</div>	<div>84047</div>			
	<div>Country (if non-U.S. address)</div>	<div>United States</div>			
<div>Listing Type</div>	<div>Other Interest Holder</div>				
<div>Positional Interests</div> <div>(check all that apply)</div>	<div>Officer, Director, Stockholder</div>				
<div>Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)</div>	<div>Citizenship</div>	<div>US</div>			
	<div>Gender</div>	<div>Male</div>			
	<div>Ethnicity</div>	<div>Not Hispanic or Latino</div>			
	<div>Race</div>	<div>White</div>			
<div>Interest Percentages</div> <div>(enter percentage values from 0.0 to 100.0)</div>	<div>Voting</div>	<div>38.0%</div>	<div>Jointly Held?</div> <div>No</div>		
	<div>Equity</div>	<div>38.0%</div>			

	Total assets (Equity Debt Plus)	0.0%
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?		No

Ownership Information			
FRN	0019260264		
Name	Rajiv Dharnidharka		
Address	PO Box		
	Street 1	4155 Los Coches Way	
	Street 2		
	City	Sacramento	
	State ("NA" if non-U.S. address)	CA	
	Zip/Postal Code	95864	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Director, Stockholder		
Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Male	
	Ethnicity	Not Hispanic or Latino	
	Race	Asian	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	10.0%	Jointly Held? No
	Equity	10.0%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information		
FRN	0021259353	
Name	Thomas Hilton	
Address	PO Box	
	Street 1	1285 W 2320 S
	Street 2	
	City	Salt Lake City
	State ("NA" if non-U.S. address)	UT

	Zip/Postal Code	84119	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Director, Stockholder		
Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Male	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	8.0%	Jointly Held? No
	Equity	8.0%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information			
FRN	0021259411		
Name	Layla Aronow		
Address	PO Box		
	Street 1	1285 W 2320 S	
	Street 2		
	City	Salt Lake City	
	State ("NA" if non-U.S. address)	UT	
	Zip/Postal Code	84119	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Director, Stockholder		
Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Female	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	8.0%	Jointly Held? No
	Equity	8.0%	

	Total assets (Equity Debt Plus)	0.0%
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?		No

Ownership Information			
FRN	0021265814		
Name	Sarah Hilton		
Address	PO Box		
	Street 1	1285 W 2320 S	
	Street 2		
	City	Salt Lake City	
	State ("NA" if non-U.S. address)	UT	
	Zip/Postal Code	84119	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Officer, Director		
Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Female	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	0.0%	Jointly Held? No
	Equity	0.0%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information		
FRN	0029163755	
Entity Name	Kimberly A. Thorne Inheritance Trust	
Address	PO Box	
	Street 1	1285 West 2320 South
	Street 2	
	City	Salt Lake City
	State ("NA" if non-U.S. address)	UT

	Zip/Postal Code	84119	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Stockholder		
Tribal Nation or Tribal Entity	Interest holder is not a Tribal nation or Tribal entity		
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	36.0%	Jointly Held? No
	Equity	36.0%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information			
FRN	0029155900		
Name	Kimberly A. Thorne		
Address	PO Box		
	Street 1	P.O. Box 25548	
	Street 2		
	City	Salt Lake City	
	State ("NA" if non-U.S. address)	UT	
	Zip/Postal Code	84119	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Officer, Director		
Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Female	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	0.0%	Jointly Held? No
	Equity	0.0%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

(b) Respondent certifies that any interests, including equity, financial, or voting interests, not reported in this filing are non-attributable. If "No," submit as an exhibit an explanation.	Yes
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<p>(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?</p> <p>If "<u>Yes</u>," 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 Click Here.</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>	No
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(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? If " <u>Yes</u> ," provide the following information for each such the relationship.	Yes
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Family Relationships			
FRN	0019264126	Name	Don Hilton
FRN	0021265814	Name	Sarah Hilton
Relationship	Parent/Child		

(e) Is Respondent seeking an attribution exemption for any officer or director with duties wholly unrelated to the Licensee(s)? If " <u>Yes</u> ," 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.	No
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3. Organizational Chart (Licensees Only)

Attach a flowchart or similar document showing the Licensee’s vertical ownership structure including the Licensee and all entities that have attributable interests in the Licensee. Licensees with a single parent entity may provide a brief explanatory textual Exhibit in lieu of a flowchart or similar document. Licensees without parent entities should so indicate in a textual Exhibit.

Non-Licensee Respondents should select “N/A” in response to this question.

File Name	Uploaded By	Attachment Type	Description
KSOP Inc. Org Chart 2020.pdf	Applicant	Ownership Chart	KSOP, Inc. Ownership Chart

Section III - Certification

Certification

Section	Question	Response
Authorized Party to Sign	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).	
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: President Exact Legal Title or Name of Respondent: KSOP, Inc. Name: Don Hilton Phone: 8019721043 01/30/2020