Response



(REFERENCE COPY - Not for submission)

Commercial Broadcast Stations Biennial Ownership Report (FCC Form 323)

File Number:0000103734Submit Date:2020-01-31FRN:0001595651Purpose:Commercial Broadcast Stations Biennial Ownership ReportStatus:ReceivedStatus Date:01/31/2020Filing Status:Active

Section I - General Information

1. Respondent

 FRN
 Entity Name

 0001595651
 Lotus Radio Corp

Street Address	City (and Country if non U. S. address)	State ("NA" if non-U.S. address)	Zip Code	Phone	Email
3301 Barham Boulevard Suite 200	Los Angeles	CA	90068	+1 (323) 512-2225	Headquarters@LotusCorp. com

2. Contact Representative

Name	Organization
Eileen Breslin	McLaughlin & Stern, LLP

Street Address	City (and Country if non U.S. address)	State	Zip Code	Phone	Email
1010 Northern Boulevard Suite 400	Great Neck	NY	11021	+1 (516) 467- 5421	EBreslin@McLaughlinStern. com

3. Application Filing Fee

Is this application being submitted without a filing fee?	No
is this application being submitted without a ming ree:	NO

Fees	Application Type	Form Number	Fee Code	Quantity	Fee Amount	Subtotal
	Biennial	Form 323	MAR	7	95	\$490.00
		·	·	•	Total	\$490.00

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		
Lotus Radio Corp	0001595651		

Fac. ID No.	Call Sign	City	State	Service
38452	KOZZ-FM	RENO	NV	FM
38457	KDOT	RENO	NV	FM
38458	кніт	RENO	NV	АМ
48685	KTHX-FM	DAYTON	NV	FM
49252	K240CA	CRYSTAL BAY	NV	FX
50304	KPLY	RENO	NV	АМ
83586	KUUB	SUN VALLEY	NV	FM
86396	K232EA	CARSON CITY	NV	FX
138802	K231CS	RENO	NV	FX
160544	KCKQ	SPARKS	NV	АМ

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 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	Nevada		
Date of execution	04/1967		
Date of expiration	No expiration date		
Agreement type (check all that apply)	Other Agreement Type: Corporate organizational document		

Document Information

Description of contract or instrument	By-Laws
Parties to contract or instrument	Nevada
Date of execution	04/1967
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Corporate organizational document

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	0001595651	
Entity Name	Lotus Radio Corp	
Address	PO Box	
	Street 1	3301 Barham Boulevard
	Street 2	Suite 200
	City Los Angeles	
	State ("NA" if non-U.S. address)	CA

	Zip/Postal Code	90068	
	Country (if non-U.S. address)	United States	
Listing Type	Respondent		
Positional Interests (check all that apply)	Respondent		
Tribal Nation or Tribal Entity	Interest holder is not a Tribal nation or Tribal entity		
Interest Percentages (enter percentage values	Voting	0.0%	Jointly Held? No
from 0.0 to 100.0)	Equity	0.0%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have that do not appear on this	an attributable interest in one c	or more broadcast stations	No

Ownership Information			
FRN	0001529171		
Entity Name	Lotus Communications Corp		
Address	PO Box		
	Street 1	3301 Barham Boulevard	
	Street 2		
	City	Los Angeles	
	State ("NA" if non-U.S. address)	CA	
	Zip/Postal Code	90068	
	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	Voting	100.0%	Jointly Held? No
from 0.0 to 100.0)	Equity	100.0%	
	Total assets (Equity Debt Plus)		
Does interest holder have that do not appear on this	an attributable interest in one report?	or more broadcast stations	Yes

FRN	0023151004
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Name	Howard A. Kalmenson		
Address	PO Box		
	Street 1	3301 Barham Boulevard	
	Street 2		
	City	Los Angeles	
	State ("NA" if non-U.S. address)	СА	
	Zip/Postal Code	90068	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Officer, Director, Other - Stockholder Trustee		
Citizenship, Gender,	Citizenship	US	
Ethnicity, and Race Information (Natural	Gender	Male	
Persons Only)	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values	Voting	100.0%	Jointly Held? No
from 0.0 to 100.0)	Equity	0.0%	
	Total assets (Equity Debt Plus)		
Does interest holder have an attributable interest in one or more broadcast stations Yes that do not appear on this report?			Yes

FRN	0023177637	
Name	Lilli Kalmenson Rosenbloom	
Address	PO Box	
	Street 1	3301 Barham Boulevard
	Street 2	
	City	Los Angeles
	State ("NA" if non-U.S. address)	CA
	Zip/Postal Code	90068
	Country (if non-U.S. address)	United States
Listing Type	Other Interest Holder	
Positional Interests (check all that apply)	Officer, Director, Other - Stockholder Trustee	
Citizenship, Gender,	Citizenship	US

Ethnicity, and Race Information (Natural Persons Only)	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)		
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?		Yes	

Ownership Information			
FRN	0023177611		
Name	James Kalmenson		
Address	PO Box		
	Street 1	3301 Barham Boulevard	
	Street 2		
	City	Los Angeles	
	State ("NA" if non-U.S. address)	СА	
	Zip/Postal Code	90068	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Officer, Director		
Citizenship, Gender,	Citizenship	US	
Ethnicity, and Race Information (Natural	Gender	Male	
Persons Only)	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)		
Does interest holder have an attributable interest in one or more broadcast stations Yes that do not appear on this report?			Yes

FRN	0023206881
Name	Jay Levine

Address	PO Box		
	Street 1	3301 Barham Boulevard	
	Street 2		
	City	Los Angeles	
	State ("NA" if non-U.S. address)	CA	
	Zip/Postal Code	90068	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Officer		
Citizenship, Gender,	Citizenship	US	
Ethnicity, and Race Information (Natural	Gender	Male	
Persons Only)	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)		
Does interest holder have an attributable interest in one or more broadcast stations Yes that do not appear on this report?			

FRN	0022792105	
Name	MELISSA B. FREDERICK	
Address	PO Box	
	Street 1	3301 Barham Boulevard
	Street 2	
	City	Los Angeles
	State ("NA" if non-U.S. address)	CA
	Zip/Postal Code	90068
	Country (if non-U.S. address)	United States
Listing Type	Other Interest Holder	
Positional Interests (check all that apply)	Officer	
Citizenship, Gender,	Citizenship US	
Ethnicity, and Race Information (Natural	Gender	Female

Persons Only)	Ethnicity	Not Hispanic or Latino		
	Race	White		
Interest Percentages (enter percentage values	Voting	0.0%	Jointly Held? No	
from 0.0 to 100.0)	Equity	0.0%		
	Total assets (Equity Debt Plus)			
Does interest holder have ar that do not appear on this re	attributable interest in one or port?	more broadcast stations	Yes	

FRN	0023168461			
Name	K JASMIN DORISMOND			
Address	PO Box			
	Street 1	3301 Barham Boulevard		
	Street 2			
	City	Los Angeles		
	State ("NA" if non-U.S. address)	CA		
	Zip/Postal Code	90068		
	Country (if non-U.S. address)	United States		
Listing Type	Other Interest Holder			
Positional Interests (check all that apply)	Officer			
Citizenship, Gender,	Citizenship	US		
Ethnicity, and Race Information (Natural	Gender	Female		
Persons Only)	Ethnicity	Not Hispanic or Latino		
	Race	Asian		
Interest Percentages (enter percentage values	Voting	0.0%	Jointly Held? No	
from 0.0 to 100.0)	Equity	0.0%	·	
	Total assets (Equity Debt Plus)			
Does interest holder have	an attributable interest in one o	r more broadcast stations	Yes	

that do not appear on this report?

FRN	0023207251		
Entity Name	The Howard A. Kalmenson Trust, Howard A. Kalmenson, Trustee		
Address	PO Box		

if non-U.S. CA code 900 non-U.S. Uni	s Angeles A 068 hited States		
if non-U.S. CA code 900 non-U.S. Uni	A 068		
code 900 non-U.S. Unit	068		
non-U.S. Uni			
	nited States		
st Holder			
	Other Interest Holder		
Stockholder			
Interest holder is not a Tribal nation or Tribal entity			
0.0)%	Jointly Held? No	
21.	21.9%		
(Equity Debt			
5	0.0 21 S (Equity Debt	0.0%	

Ownership Information				
FRN	0023207277			
Entity Name	The Lilli Kalmenson Rosenbloom Trust, Lilli Kalmenson Rosenbloom, Trustee			
Address	PO Box	O Box		
	Street 1	5031 Brewster Drive		
	Street 2			
	City	Tarzana		
	State ("NA" if non-U.S. address)	CA		
	Zip/Postal Code	91352		
	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	Voting	0.0%	Jointly Held? No	
from 0.0 to 100.0)	Equity	21.9%		

	Total assets (Equity Debt Plus)				
Does interest holder h that do not appear on	nave an attributable interest in one or more broadcast statior this report?	ns No			
// · · · · · · · · · · · · · · · · · ·	es that any interests, including equity, financial, or voting	Yes			

interests, not reported in this filing are non-attributable.	
If "No," submit as an exhibit an explanation.	

(c) Does the Respondent or any reported interest holder	No
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?	
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.	
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.	
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.	
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.	

(d) Are any of the individuals listed as an attributable interest holder in the Respondent married to each other Yes or related to each other as parentchild or as siblings?

If "Yes," provide the following information for each such the relationship.

Family Relationships				
FRN	0023151004	Name	Howard A Kalmenson	
FRN	0023177611	Name	James Kalmenson	
Relationship	Parent/Child			

Family Relationships

FRN	0023177637	Name	Lilli Kalmenson Rosenbloom
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FRN	0023177611	Name	James Kalmenson
Relationship	Parent/Child		

(e) Is Respondent seeking an attribution exemption for any officer or director with duties wholly unrelated to the Licensee(s)?	No
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.	

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
N0110852.PDF	Applicant	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 LICENSEOR 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: Senior Vice President Exact Legal Title or Name of Respondent: Lotus Radio Corp. Name: Jay A. Levine Phone: 3235122225 01/31/2020