

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

15 March 2022

In re Applications of)	
)	
REMANENTE BROADCASTING NETWORK)	FRN 0031563182
)	
For NEW Reserved Channel NCE Broadcast Stations)	
Facility ID 766052 in Twentynine Palms, CA)	FCC File No. 0000167137
Facility ID 766048 in Indian Springs, NV)	FCC File No. 0000167138
Facility ID 766056 in Salton City, CA)	FCC File No. 0000167140
Facility ID 766055 in Dudleyville, AZ)	FCC File No. 0000167141
Facility ID 766049 in Firebaugh, CA)	FCC File No. 0000167143
Facility ID 766046 in Fairview, UT)	FCC File No. 0000167145
Facility ID 766042 in Maroni, UT)	FCC File No. 0000167147
Facility ID 766061 in La Paz Valley, AZ)	FCC File No. 0000167392
Facility ID 766053 in Boron, CA)	FCC File No. 0000167635
)	
)	
CADENA RADIAL REMANENTE)	FRN 0031563182
)	
For Renewal of License of Call Sign KZLQ-LP)	
Facility ID 195343 in La Quinta, CA)	FCC File No. 0000155938

To: Marlene H. Dortch, Secretary
Federal Communications Commission
Attn: Media Bureau, Audio Division

INFORMAL OBJECTION

Triangle Access Broadcasting, Inc. (“Triangle”), pursuant to 47 C.F.R. §73.3587, objects to a grant of the captioned applications (the “Applications”) submitted by Remanente Broadcasting Network (“RBN”) in the November, 2021, NCE FM Filing Window for new NCE broadcast stations (“NCE Applications” or “RBN Applications”) and Cadena Radial Remanente's (“CRR”) for renewal of an LPFM license. Triangle objects on the grounds that RBN and CRR are commonly controlled along

with another LPFM station owned by another associated entity.¹ Triangle further objects because RBN and its associated entities have obscured the parties in interest in the NCE Applications and in other related applications for LPFM stations in order to conceal the common interests.²

The RBN Applications identify the attributable parties as Edith Gonzalez Werner, Delia Gloria Gonzalez, and Gabriella Werner. Attached as Exhibit A is Internal Revenue Service (“IRS”) Form 990EZ submitted by Cadena Radial Mision Y Visio Corp (“Mision”), signed November 11, 2020, and covering the year 2019, the latest year published by the IRS. Mision is the licensee of KRAQ-LP, facility ID 195336, in Rancho Mirage, California. This Form 990EZ, subscribed as true under penalty of perjury by Delia Gloria Gonzalez, acting as the corporate treasurer, lists Edith Gonzalez and herself as Mision corporate officers along with Julia Gonzalez.³ The overlap of officers with RBN reveals a prohibited LPFM cross ownership.⁴ If Mision's initial applications are taken at face value, the Form 990EZ listing also raises a question of an authorized transfer of control of KRAQ-LP. No parties from the initially granted Mision application for an LPFM station are disclosed on the IRS form.⁵ Because the overlap of attributable interests was not addressed in the RBN Applications, those applications should be dismissed.

Although it may be convenient to explain away the overlap as an oversight, a pattern exists demonstrating that FCC applications involving RBN's parties repeatedly differ from other “official” forms filed by entities controlled by these parties. The pattern strongly suggests that FCC applications were manipulated to conceal overlapping interests. Attached as Exhibit B (“CRR California filings”), Delia Gloria Gonzalez certified corporate status forms filed in the State of California on both June 28,

1 See 47 C.F.R. § 73.860 (“LPFM cross-ownership rule”).

2 See 47 C.F.R. §§ 1.17, 73.3513(d), 73.1015 (“truthfulness and accuracy rules”).

3 Identification as Elizabeth Gonzalez and Edith Gonzalez-Werner are used interchangeably, established in the RBN application being signed by “Edith Gonzalez, President” while listing herself as “Edith Gonzalez Werner, President” the sections listing the parties to the application.

4 A prohibited ownership actually exists. File no. 0000167190 for facility ID 766058 in Barstow, California, was granted on December 20, 2021.

5 See BNPL-20131113ABF and 47 C.F.R. § 73.865 (“LPFM assignment and transfer rule”).

2018, and May 19, 2021, that show Jaime Mitrani and Julia Gonzales as corporate officers of Cadena Radial Remanente (“CRR”). CRR is the licensee of KZLQ-LP, facility ID 195343, in La Quinta, California. Of note, Mitrani signed the Mision renewal application for KRAQ-LP on August 2, 2021, creating another nexus of organizations and indicating that the colocated LPFM stations are commonly controlled.

Examining CRR's IRS Form 990EZ, signed November 16, 2020, and attached as Exhibit C, familiar Delia Gloria Gonzalez, Edith Gonzalez, and Julia Gonzalez are listed as CRR's 2019 corporate officers. These officers, matching Mision's officers in its 2019 Form 990EZ, do not align with CRR's California filings on June 28, 2018, and May 19, 2021, a period that surrounds 2019.⁶ The CRR Form 990EZ filed with the IRS demonstrates commonality with the RBN (and Mision) applications and establishes a history of prohibited common attributable interests that have not been disclosed to the Commission.

In general, a Triangle is concerned about a lack of reliability of any information presented by the organizations. As an example, Exhibit D shows CRR's 2021 Periodic Report filed with the Texas Secretary of State. Recall from above and Exhibit B that the similar-purposed May 19, 2021, California report filed by Delia G. Gonzalez affirms CRR's officers as unchanged from the 2018 report, thus being Ramon Reynaga, Jaime Mitrani, and Julia Gonzalez. The October 6, 2021, Texas report was filed by Olivia Gonzalez and lists the CRR officers as herself, Daniella J. Gonzalez, and Alma Gonzalez. There is no overlap between the closely-spaced filings. Exhibit E is the Texas information report for Mision also filed on October 6, 2021. It lists the same officers as the CRR report.⁷ Triangle is left to throw up its hands, knowing only that between unauthorized transfers of control or inaccurate statements, these organizations are not qualified to hold the public's broadcast licenses.

⁶ Form 990EZ filings for 2018 list the same corporate officers as for year 2019 for both LPFM organizations. Although not attached, the filings are available at <https://apps.irs.gov/app/eos/>

⁷ Daniella J. Gonzalez and Daniella J. Werner are believed to be the same individual.

What we have is a quagmire, dating back to the original CRR and Mision LPFM applications where even those had to be amended due to board problems.⁸ With a litany of inconsistencies in official filings, it is impossible to completely identify actual interests in RBN, Mision, and CRR. It is obvious, though, that the RBN Applications cannot be granted because the attributable interests between RBN, KRAQ-LP, and KZLQ-LP are intertwined. It is also evident that Delia Gloria Gonzalez has repeatedly certified, under penalty of perjury, conflicting information to various governmental agencies to demonstrate a lack of candor disqualifying her from holding any interest in an FCC license for at least some period of time. Because of the numerous of the discrepancies, all persons associated with the three organizations should be required to disclose this matter in response to questions related to character issues and adverse findings. The set of all officers certified across all government agencies should be regarded as the parties with attributable interests for the individual organizations, the RBN applications should be dismissed, RBN's unbuilt construction permit rescinded upon the Bureau's reconsideration on its own motion, the license renewal for KZLQ-LP should be denied, and the license for KRAQ-LP should be designated for hearing for possible revocation.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Steven L. White", with a long, sweeping horizontal line extending to the right.

Steven L. White

Director; *Triangle Access Broadcasting, Inc.*

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⁸ See BNPL-20131113ABE and BNPL-20131113ABF. We can see now that these were only paper exercises and that independent control has never been maintained.