

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In re Applications of

<b>Multicultural Radio Broadcasting Licensee, LLC for Renewal of License of Stations</b>	)	FRN: 0010215812
	)	
	)	
WZRC (AM), New York, NY	)	File no. 0000182573
WHWH (AM), Princeton, NJ	)	File no. 0000182604
WPAT (AM), Paterson, NJ	)	File no. 0000182686
WKDM (AM), New York, NY	)	File no. 0000182689
WTTM (AM), Lindenwold, NJ	)	File no. 0000182588
WWRU (AM), Jersey City, NJ	)	File no. 0000182675

To: The Commission  
Attn: Media Bureau

**Motion to Strike the “UCCA Motion to Strike Unauthorized Pleading”**

Multicultural Radio Broadcasting Licensee, LLC (“MRBL”), by its counsel, hereby files this “Motion to Strike” in response to the “Motion to Strike Unauthorized Pleading” filed on June 10, 2022, by the Ukrainian Congress Committee of America, Inc. (“UCCA”). As a pretense for filing a Motion to Strike, UCCA has instead filed a pleading raising several new matters alleging a transfer of control of Station WZHF(AM) and claiming that items are missing from certain stations’ online public inspection files. These matters are clearly unauthorized at this stage and must be stricken from the record.

1. On June 1, 2022, MRBL submitted a “Motion for Leave” and a “Supplement to Opposition to Petition to Deny and Revoke”. The main purpose of the Supplement was to provide an Affidavit from someone with personal knowledge of certain factual information. However, in that pleading, MRBL also noted that UCCA

submitted a defective Affidavit from a person claiming to listen to stations in several different foreign languages that he does not claim to understand. In the Affidavit, this individual also claims to have personal knowledge of programs aired on Station WZHF(AM), Capitol Heights, Maryland, although he has never indicated that he listens to Station WZHF.

2. Instead of defending its defective Affidavit, UCCA goes on the offensive and raises matters that could have been asserted in earlier pleadings. These matters are clearly unauthorized at this stage in the proceeding. UCCA fails to explain why it waited until more than a month after the May 2, 2022 comment deadline to raise these new matters. UCCA has not asked for leave to supplement the record.<sup>1</sup>

3. It is clear that UCCA is deflecting the Commission's attention from its own failure to provide an acceptable Affidavit and instead of addressing this failure, it is attempting to divert the Commission's attention away from UCCA's lack of standing. Thus as a result, these allegations must be stricken from the record.

Respectfully submitted,

Multicultural Radio Broadcasting Licensee,  
LLC



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June 27, 2022

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<sup>1</sup> Nevertheless, in the event that the Commission decides to consider these allegations on its own motion, MRBL is filing an Opposition pleading separately.

Declaration of Sean Kim

I, Sean Kim, am Chief Financial Officer of Multicultural Radio Broadcasting Licensee, LLC and Way Broadcasting Licensee, LLC. I declare under penalty of perjury that I have read the Motion to Strike. I have personal knowledge of the facts. The factual statements made in this pleading are true and correct to the best of my belief and made in good faith.

A handwritten signature in black ink, appearing to read 'SKIM', written over a horizontal line.

Sean Kim

## CERTIFICATE OF SERVICE

I, Mark N. Lipp, of Fletcher, Heald & Hildreth, PLC, hereby certify that I caused a copy of the foregoing Motion to Strike the "UCCA Motion to Strike Unauthorized Pleading" to be sent on June 27, 2022, via email to the following individuals:

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Mark N. Lipp