

*Before the
Federal Communications Commission
Washington, DC 20554*

<i>In re Application of</i>)	NCE MX Group 95
)	
WORLD FEDERATION OF PASTORS AND)	File No. 0000167179
MINISTERS OF THE FULL GOSPEL, INC.)	Facility No. 768120
)	
<i>For Construction Permit for a New</i>)	
<i>Noncommercial FM Station at Country Squire Lakes, IN¹</i>)	

Filed with: **Office of the Secretary**
Directed to: **Audio Division, Media Bureau**

OPPOSITION TO PETITION TO DENY

World Federation of Pastors and Ministers of the Full Gospel, Inc. (“World Federation”), by its attorney, hereby submits its Opposition to the “Petition to Deny” filed by Lushomo Health Education Centre (“Lushomo”) concerning World Federation’s application for a new noncommercial FM broadcast station to serve Country Squire Lakes, Indiana. With respect thereto, the following is stated:

Background

World Federation is an organization that originated on July 12, 2012. Its initial incorporation (*i.e.*, founder) was Nestor Gabriel Kost, and its three Directors were as follows:

Nestor G. Kost Sr.
Feliciano Martinez,
Vilma I. Kost

Attachment 1. Those three directors continued as Directors of World Federation in 2013.

Attachment 2. In 2014, a fourth Director was added to World Federation, and the Directors became as follows:

¹ The spelling of the community, from “Country Squire Lake” to “Country Squire Lakes” has been corrected by amendment filed on August 22, 2022.

Nestor G. Kost Sr.
Feliciano Martinez,
Vilma I. Kost
Ivan G. Kost, Sr.

Attachment 3. That Board continued to remain in place in 2015 (Attachment 4) and 2016 (Attachment 5), Finally, in 2017, the Directors of World Federation became:

Nestor G. Kost Sr.
Feliciano Martinez,
Vilma I Kost
Ivan G. Kost, Sr.
Juan M Vernanchet

Attachment 6, which then remained in place in 2018 (Attachment 7); 2019 (Attachment 8); 2020 (Attachment 9); and through April 27, 2021 (Attachment 10). On October 29, 2021, the Board of World Federation changed the composition of the Board to the following:

Walberto Berrios
Sonia Valdez
Ismelda Blanco

Attachment 11. That has remained the composition of the Board through early and mid-2022 (Attachments 12 and 13). Although a new Board Member (Fernmin Castaneda) briefly joined the Board in May 2022 (Attachment 14), he has resigned, and the Board currently remains consisting solely of Walberto Berrios, Sonia Valdez, and Ismelda Blanco, at the present time. Attachment 15.

World Federation filed its application for a new non-commercial FM broadcast station to serve Country Squire Lakes, Indiana on November 9, 2021. LMS File No. 0000167179 (the “Application”). Consistent with the information provided to the State of Florida, its three named Directors are indeed Walberto Barrios, Sonia Valdez, and Ismelda Blanco.² Although Mr.

² The spelling of Ms. Blanco’s name in the Application (from “Ismelda Blaco” to Ismelda Blanco” has also been corrected by amendment filed on August 22, 2022.

Fermin Castenada served as a Director in World Federation from May 6, 2022 - August 22, 2022, as seen in Attachment 16, he is not a Director at this time, and the identities of the principals named in the Application are accurate at this time. Attachment 16.

On July 12, 2022, the Bureau issued a *Letter Decision*, DA 22-749 (MB July 12, 2022) (“*Letter Decision*”), designating World Federation’s Application for Country Squire Lakes as the tentative selectee in NCE MX Group 95 after conducting a fair distribution analysis pursuant to Section 307(b) of the Communications Act of 1934, as amended. *Letter Decision* at 5.

Discussion

It must first be noted that the Lushomo Petition was never properly served upon World Federation. The Commission’s Rules state in pertinent part:

Where the Commission or any person is required by statute or by the provisions of this chapter to serve any document upon any person, service shall (in the absence of specific provisions in this chapter to the contrary) be made in accordance with the provisions of this section.

47 C.F.R. § 1.47(a) (emphasis added).

Where any person is required to serve any document filed with the Commission, service shall be made by that person or by his representative on or before the day on which the document is filed.

47 C.F.R. § 1.47(b) (emphasis added). Finally, the Rules state:

Except in formal complaint proceedings against common carriers under §§ 1.720 through 1.740 and proceedings related to the Wireless Radio Services under subpart F of this part, documents may be served upon a party, his attorney, or other duly constituted agent **by delivering a copy or by mailing a copy to the last known address**. Documents that are required to be served must be served in paper form, even if documents are filed in electronic form with the Commission, unless the party to be served agrees to accept service in some other form. Petitions, pleadings, and other documents associated with licensing matters in the Wireless Radio Services must be served electronically upon a party, his attorney, or other duly constituted agent by delivering a copy by email to the email address listed in the Universal Licensing System (ULS). If a filer is not an applicant or licensee, the document must include an email address for receiving electronic service.

1.47(d) (emphasis added).

This proceeding does not involve a “document associated with licensing matters in the Wireless Radio Service” which would allow automatically service provided “electronically” to be valid. Therefore, under the Commission’s rules, service in this case was required to be “in paper form” (*i.e.*, by either U.S. mail or hand delivery) unless World Federation “agree[d] to accept” e-mail service or service by some other means. 47 C.F.R. § 1.47(d).

In this case, the only attempted “service” by Lushomo was “via-email” Petition at 28. However, again, under Section 1.47(d) of the Commission’s Rules, for such “service” to be deemed adequate, consent (*i.e.*, “unless the party to be served agrees”) to “e-mail” electronic delivery of the Petition was required for such electronic service. In this proceeding, no such consent was ever sought, nor was it ever provided by undersigned counsel, and no waiver of the Rule has been sought on behalf of Lushomo Health Education Centre.

Therefore, official “service” of the Petition to World Federation “in paper form” (as required under Section 1.47(d) of the Commission’s Rules) did not timely occur and in fact has not yet occurred at any time, to date.³

For this reason, the Petition must be dismissed on procedural grounds. As the Commission has clearly stated:

failure to serve in itself renders a pleading defective and subject to dismissal. *See* 47 CFR § 1.106(f) (requiring service of petitions for reconsideration); *see also* *Petition for Limited Clarification of Frontline Wireless, LLC*, WT Docket No. 17-153, Order, 24 FCC Rcd 14899, 14900, para. 3 (2009) (citing failure to serve petition for reconsideration as alternative ground for dismissal); *Thomas K. Kurian and AMTS Consortium, LLC*, File No. 0002196859, Second Order on Further Reconsideration, 22 FCC Rcd 20970, 20971, para. 3 (WTB MD 2007) (similar); *D&I Electronics, Inc.*, Order, 16 FCC Rcd 15243, 15249, para. 15 (WTB PSPWD 2001) (dismissing petition for reconsideration due to failure to serve); *Application of Sherry Rullman*, File No. 12903-CM-P-83, Memorandum Opinion and Order, 8 FCC Rcd 4012, 4012-13, para. 6 (1993) (explaining that service of process affords interested parties an opportunity to be heard and thus failure to provide service as required by Commission rules renders pleading procedurally defective); *AT&T & Associated Bell System Cos.*, Docket No.

³ Lushomo’s counsel was provided notice of this deficiency by counsel for World Federation earlier this week. To the best knowledge of World Federation, this deficiency has not yet been cured.

19129, Memorandum Opinion and Order, 27 F.C.C.2d 914, 915, para. 6 (1971) (dismissing petition for stay in part on the ground that it was not properly served on other parties in a hearing as required under 47 CFR § 1.211).

William L. Zawila, Permittee of FM Station KNGS, Coalinga, California, 34 FCC Rcd 13049, 13051, n.12 (2019).

On the merits, the Petition fails, as well. Based upon the facts, absolutely no basis exists for denial of the World Federation Application. While it is indeed true that Ms. Castenada should have listed in the World Federation Application for the brief time he served as Director, his transitory involvement has no bearing on the grantability of the Application. Lushomo accuses World Federation of having “undisclosed attributable interests.” Petition at 3-4. To the extent Mr. Castenada may have cognizable involvement in other stations (which would in this case bar commencement of operations until such interests were divested), since at this time Mr. Costaneda is not a principal of the organization, that impediment no longer exists. Moreover, to the extent Lushomo suggests those interests are nevertheless attributable and “frozen” (Petition at 4), and that Sonia Valdez has an attributable involvement in other stations (Petition at 7), it must be remembered that World Federation is the prevailing party in NCE MX Group 95 based not on “points” (which would be determined, in part, based upon the number of attributable interests held by World Federation and its principals), but rather, based upon World Federation’s fair distribution analysis Section 307(b) preference. *Letter Decision* at 5. As such, since that 307(b) remains unaffected, there was no “comparative downgrade” in World Federation’s assessed qualifications when Mr. Costaneda temporarily joined the Board of World Federation, and no “impermissible upgrade” after he departed. In other words, the “attributable interests” analysis engaged in by Lushomo, even *if* it was accurate, has no bearing on the outcome of this case.

The one single case Lushomo cites in support of its Petition is *The Marion Education Exchange*, DA 22-187 (MB 2022), wherein evidence was submitted to support the claim that the board members of the licensee in question were “completely different people” than those listed in an assignment application presented to the Commission, and consequently that specific claims in an application in that case that there were “no changes in the board members, only the name of the licensee” was false. To support his claim, the petitioner in that case submitted copies of corporate materials filed with the State of Ohio. The Bureau found that the record raised substantial and material questions of fact of whether the licensee deliberately failed to notify the Commission of a *pro forma* transfer of control that occurred in 2019 in violation of Section 73.865 of the Rules.

Here, in contrast, there was absolutely no transfer of control of the applicant/proposed licensee – only a transitory addition of one director. As such, this case bears absolutely no similarity to the *Marion* case.

As to Lushomo’s other claims, there is no “undisclosed real party in interest” as claimed by Lushomo. Petition at 5-7. First of all, under Section 309(d) of the Communications Act, as amended, a petitioner must submit “specific allegations of fact sufficient to show that a grant of the application would be prima facie inconsistent” with the public interest, convenience, and necessity served by granting the application. 47 U.S.C. § 309(d). Allegations of fact, except for those of which official notice may be taken, must be supported by an affidavit or declaration under penalty of perjury of someone with personal knowledge of the facts alleged. *Tribune Media Company*, 34 FCC Rcd 8437, 8448 ¶ 23 (2019). In other words, petitions to deny must provide properly supported allegations of fact that, if true, would establish a substantial and

material question of fact that grant of the application would be *prima facie* inconsistent with the public interest, convenience, and necessity.

No such “affidavit” or “declaration,” or “specific allegation of fact” in this case have been submitted by Lushomo. Instead, Lushomo attempts to argue to World Federation’s “web site” provides evidence that founder Nestor Gabriel Kost remains involved in the organization, and “he appears to operate in an executive role” (Petition at 6), and that other evidence shows a “pattern of consolidation” with various LPFM stations. Petition at 6.

As to the web site, all that Lushomo’s “evidence” consists of is an old web site showing inaccurate information about World Federation. Attachment 16. The web-site is 2-3 years old, and has not been updated. As such, that web site merely showed the former state of affairs from prior to the change in the Board from last year. The current World Federation web site, which Lushomo pointedly failed to provide to the FCC, is www.wfpmfg.com/, a copy of which is provided in Attachment 17.

Moreover, as confirmed in Attachment 16, contrary to Lushomo’s allegations, World Federation has no control over any other organization identified in Lushomo’s Petition, and while Nestor Kost continues to serve as an advisor to the organization, he retains no control over the organization, and the Board’s affairs are wholly under the control of the current World Federation Board of Directors. Attachment 16. Aside from speculation and surmise, nothing presented by Lushomo establishes otherwise.⁴

⁴ Lushomo also attacks the operations and licensees of four LPFM stations – Llamados Para Triunfar, Inc., licensee of Station WVKG-LP; Multimedia America, Inc., licensee of Station WQPN-LP; American Network Media, Inc., licensee of Station WNGK-LP; and Radio Voz Mundial, Inc., licensee of Station WPSI-LP and C.E.L.A. International University Inc. Petition at 6-7 and Attachment 6-7. World Federation has no involvement in those organizations. Attachment 16.

World Federation is fully qualified to have its Application for a new non-commercial FM station to serve Country Squire Lakes granted. Therefore, the Petition to Deny filed by Lushomo should itself be denied.

WHEREFORE, it is requested that the Petition to Deny filed by Lushomo Health Education Centre dated August 11, 2022, must be denied.

Respectfully submitted,

**WORLD FEDERATION OF
PASTORS AND
MINISTERS, INC.**

By: ____/Dan J. Alpert/_____
Dan J. Alpert

Its Attorney

*The Law Office of Dan J. Alpert
2120 N. 21st Rd.
Arlington, VA 22201
703-243-8690*

August 24, 2022

ATTACHMENT 1

**Electronic Articles of Incorporation
For**

N12000006801
FILED
July 12, 2012
Sec. Of State
psmith

WORLD FEDERATION OF PASTORS AND MINISTERS OF THE FULL
GOSPEL,INC.

The undersigned incorporator, for the purpose of forming a Florida not-for-profit corporation, hereby adopts the following Articles of Incorporation:

Article I

The name of the corporation is:

WORLD FEDERATION OF PASTORS AND MINISTERS OF THE FULL
GOSPEL,INC.

Article II

The principal place of business address:

1380 WEST FLAGLER ST
L
MIAMI, FL. 33135

The mailing address of the corporation is:

P.O. BOX 669371
MIAMI, FL. 33166

Article III

The specific purpose for which this corporation is organized is:

ORGANIZATION OF PASTORS AND MINISTERS FOR INTERNATIONAL
COMMUNICATION AND FELLOWSHIP

Article IV

The manner in which directors are elected or appointed is:

AS PROVIDED FOR IN THE BYLAWS.

Article V

The name and Florida street address of the registered agent is:

NESTOR G KOST SR.
8270 N.W. 10 ST.
3
MIAMI, FL. 33126

I certify that I am familiar with and accept the responsibilities of
registered agent.

Registered Agent Signature: NESTOR GABRIEL KOST

N12000006801
FILED
July 12, 2012
Sec. Of State
psmith

Article VI

The name and address of the incorporator is:

NESTOR GABRIEL KOST
8270 N.W. 10 ST.
3
MIAMI, FLORIDA 33126

Electronic Signature of Incorporator: NESTOR GABRIEL KOST

I am the incorporator submitting these Articles of Incorporation and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of this corporation and every year thereafter to maintain "active" status.

Article VII

The initial officer(s) and/or director(s) of the corporation is/are:

Title: P
NESTOR G KOST SR.
8270 N.W. 10 ST. # 3
MIAMI, FL. 33126

Title: VP
FELICIANO MARTINEZ
P.O. BOX 669371
MIAMI, FL. 33166

Title: S
VILMA I KOST MRS.
8270 N.W. 10 ST. # 3
MIAMI, FL. 33126

ATTACHMENT 2

2013 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

FILED
Apr 30, 2013
Secretary of State
CC0741222886

Current Principal Place of Business:

1380 WEST FLAGLER ST
L
MIAMI, FL 33135

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: NOT APPLICABLE

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

KOST, NESTOR GSR.
8270 N.W. 10 ST.
3
MIAMI, FL 33126 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name KOST, NESTOR GSR.
Address 8270 N.W. 10 ST. # 3
City-State-Zip: MIAMI FL 33126

Title VP
Name MARTINEZ, FELICIANO
Address P.O. BOX 669371
City-State-Zip: MIAMI FL 33166

Title S
Name KOST, VILMA IMRS.
Address 8270 N.W. 10 ST. # 3
City-State-Zip: MIAMI FL 33126

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: NESTOR GABRIEL KOST

PRESIDENT

04/30/2013

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 3

2014 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

FILED
Apr 29, 2014
Secretary of State
CC3967263872

Current Principal Place of Business:

965 WEST FLAGLER ST
MIAMI, FL 33130

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: NOT APPLICABLE

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

KOST, NESTOR GSR.
8270 N.W. 10 ST.
3
MIAMI, FL 33126 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name KOST, NESTOR GSR.
Address 8270 N.W. 10 ST. # 3
City-State-Zip: MIAMI FL 33126

Title VP
Name MARTINEZ, FELICIANO
Address P.O. BOX 669371
City-State-Zip: MIAMI FL 33166

Title S
Name KOST, VILMA IMRS.
Address 8270 N.W. 10 ST. # 3
City-State-Zip: MIAMI FL 33126

Title TREASURER
Name KOST, IVAN G SR.
Address 965 WEST FLAGLER ST
City-State-Zip: MIAMI FL 33130

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: NESTOR GABRIEL KOST

P/D

04/29/2014

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 4

2015 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

FILED
Apr 24, 2015
Secretary of State
CC5214120004

Current Principal Place of Business:

965 WEST FLAGLER ST
MIAMI, FL 33130

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: 47-3824123

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

KOST, NESTOR GSR.
3710 ESTEPONA AV
3
MIAMI, FL 33178 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name KOST, NESTOR GSR.
Address 3710 ESTEPONA AV
City-State-Zip: MIAMI FL 33178

Title VP
Name MARTINEZ, FELICIANO
Address P.O. BOX 669371
City-State-Zip: MIAMI FL 33166

Title S
Name KOST, VILMA IMRS.
Address 3710 ESTEPONA AV
City-State-Zip: MIAMI FL 33178

Title TREASURER
Name KOST, IVAN G SR.
Address 965 WEST FLAGLER ST
City-State-Zip: MIAMI FL 33130

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: NESTOR GABRIEL KOST

PRESIDENT

04/24/2015

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 5

2016 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

FILED
Apr 29, 2016
Secretary of State
CC6208655431

Current Principal Place of Business:

3710 ESTEPONA AV
DORAL, FL 33178

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: 47-3824123

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

KOST, NESTOR GSR.
3710 ESTEPONA AV
3
MIAMI, FL 33178 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name KOST, NESTOR GSR.
Address 3710 ESTEPONA AV
City-State-Zip: MIAMI FL 33178

Title VP
Name MARTINEZ, FELICIANO
Address P.O. BOX 669371
City-State-Zip: MIAMI FL 33166

Title S
Name KOST, VILMA IMRS.
Address 3710 ESTEPONA AV
City-State-Zip: MIAMI FL 33178

Title TREASURER
Name KOST, IVAN G SR.
Address 2100 W 76 ST
307
City-State-Zip: HIALEAH FL 33016

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: NESTOR G KOST

PRESIDENT

04/29/2016

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 6

2017 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

FILED
Apr 27, 2017
Secretary of State
CC8922532540

Current Principal Place of Business:

3710 ESTEPONA AV
DORAL, FL 33178

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: 47-3824123

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

KOST, NESTOR GSR.
3710 ESTEPONA AV
3
MIAMI, FL 33178 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name KOST, NESTOR GSR.
Address 3710 ESTEPONA AV
City-State-Zip: MIAMI FL 33178

Title VP
Name MARTINEZ, FELICIANO
Address P.O. BOX 669371
City-State-Zip: MIAMI FL 33166

Title S
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City-State-Zip: MIAMI FL 33178

Title TREASURER
Name KOST, IVAN G SR.
Address 2100 W 76 ST
307
City-State-Zip: HIALEAH FL 33016

Title V/P
Name VERNANCHET, JUAN M
Address 2100 WEST 76 ST.
307
City-State-Zip: HIALEAH FL 33016

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SIGNATURE: NESTOR GABRIEL KOST

P

04/27/2017

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 7

2018 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

FILED
Apr 30, 2018
Secretary of State
CC8684519555

Current Principal Place of Business:

3710 ESTEPONA AV
DORAL, FL 33178

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: 47-3824123

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

KOST, NESTOR GSR.
3710 ESTEPONA AV
3
MIAMI, FL 33178 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

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Title TREASURER
Name KOST, IVAN G SR.
Address 2100 W 76 ST
307
City-State-Zip: HIALEAH FL 33016

Title V/P
Name VERNANCHET, JUAN M
Address 2100 WEST 76 ST.
307
City-State-Zip: HIALEAH FL 33016

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SIGNATURE: NESTOR GABRIEL KOST

PRESIDENT

04/30/2018

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 8

2019 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

FILED
Apr 29, 2019
Secretary of State
8057181379CC

Current Principal Place of Business:

3710 ESTEPONA AV
DORAL, FL 33178

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: 47-3824123

Certificate of Status Desired: Yes

Name and Address of Current Registered Agent:

KOST, NESTOR GSR.
3710 ESTEPONA AV
3
MIAMI, FL 33178 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name KOST, NESTOR GSR.
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City-State-Zip: MIAMI FL 33178

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Address P.O. BOX 669371
City-State-Zip: MIAMI FL 33166

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Address 3710 ESTEPONA AV
City-State-Zip: MIAMI FL 33178

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307
City-State-Zip: HIALEAH FL 33016

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307
City-State-Zip: HIALEAH FL 33016

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SIGNATURE: NESTOR KOST

PRESIDENT

04/29/2019

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 9

2020 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.**FILED**
Jun 29, 2020
Secretary of State
9297533965CC**Current Principal Place of Business:**3710 ESTEPONA AV
DORAL, FL 33178**Current Mailing Address:**P.O. BOX 669371
MIAMI, FL 33166**FEI Number: 47-3824123****Certificate of Status Desired: No****Name and Address of Current Registered Agent:**KOST, NESTOR GSR.
3710 ESTEPONA AV
3
MIAMI, FL 33178 US*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.***SIGNATURE:**_____
Electronic Signature of Registered Agent_____
Date**Officer/Director Detail :**

Title	P
Name	KOST, NESTOR GSR.
Address	3710 ESTEPONA AV
City-State-Zip:	MIAMI FL 33178

Title	VP
Name	MARTINEZ, FELICIANO
Address	P.O. BOX 669371
City-State-Zip:	MIAMI FL 33166

Title	S
Name	KOST, VILMA IMRS.
Address	3710 ESTEPONA AV
City-State-Zip:	MIAMI FL 33178

Title	TREASURER
Name	KOST, IVAN G SR.
Address	2100 W 76 ST 307
City-State-Zip:	HIALEAH FL 33016

Title	V/P
Name	VERNANCHET, JUAN M
Address	2100 WEST 76 ST. 307
City-State-Zip:	HIALEAH FL 33016

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: NESTOR G KOST**PRESIDENT****06/29/2020**_____
Electronic Signature of Signing Officer/Director Detail_____
Date

ATTACHMENT 10

2021 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

FILED
Apr 27, 2021
Secretary of State
3949387207CC

Current Principal Place of Business:

3710 ESTEPONA AV
DORAL, FL 33178

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: 47-3824123

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

KOST, NESTOR GSR.
3710 ESTEPONA AV
3
MIAMI, FL 33178 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name KOST, NESTOR GSR.
Address 3710 ESTEPONA AV
City-State-Zip: MIAMI FL 33178

Title VP
Name MARTINEZ, FELICIANO
Address P.O. BOX 669371
City-State-Zip: MIAMI FL 33166

Title S
Name KOST, VILMA IMRS.
Address 3710 ESTEPONA AV
City-State-Zip: MIAMI FL 33178

Title TREASURER
Name KOST, IVAN G SR.
Address 2100 W 76 ST
307
City-State-Zip: HIALEAH FL 33016

Title V/P
Name VERNANCHET, JUAN M
Address 2100 WEST 76 ST.
307
City-State-Zip: HIALEAH FL 33016

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: JUAN M VERNANCHET

VP

04/27/2021

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 11

2021 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL REPORT

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE FULL GOSPEL, INC.

Current Principal Place of Business:

2100 W 76 ST
304
HIALEAH , FL 33016

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: 47-3824123

Certificate of Status Desired: Yes

Name and Address of Current Registered Agent:

BLANCO , ISMELDA
3710 ESTEPONA AV
3
MIAMI, FL 33178 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: ISMELDA BLANCO

10/29/2021

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name BLANCO , ISMELDA
Address 2100 W 76 ST.
304
City-State-Zip: HIALEAH FL 33016

Title VP
Name VALDES , SONIA
Address 2100 W 76 ST
304
City-State-Zip: HIALEAH FL 33016

Title S
Name BERRIOS , WALBERTO
Address 2100 W 76 ST
304
City-State-Zip: HIALEAH FL 33016

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: ISMELDA BLANCO

PRESIDENT

10/29/2021

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 12

2022 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

FILED
Jan 24, 2022
Secretary of State
9078422731CC

Current Principal Place of Business:

2100 W 76 ST
304
HIALEAH, FL 33016

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: 47-3824123

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

BLANCO, ISMELDA
3710 ESTEPONA AV
3
MIAMI, FL 33178 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: ISMELDA BLANCO

01/24/2022

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name BLANCO, ISMELDA
Address 1775 NORMANDY DR
4
City-State-Zip: MIAMI BEACH FL 33141

Title VP
Name VALDES, SONIA
Address 5400 SW 77 CT
3 A
City-State-Zip: MIAMI FL 33155

Title S
Name BERRIOS, WALBERTO
Address 2517 NW 21 ST TERR
9
City-State-Zip: MIAMI FL 33142

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: ISMELDA BLANCO

PRESIDENT

01/24/2022

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 13

**2022 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL
REPORT**

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

Current Principal Place of Business:

2100 W 76 ST
304
HIALEAH , FL 33016

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: 47-3824123

Certificate of Status Desired: Yes

Name and Address of Current Registered Agent:

BLANCO , ISMELDA
3710 ESTEPONA AV
3
MIAMI, FL 33178 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: ISMELDA BLANCO

04/21/2022

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name BLANCO , ISMELDA
Address 1775 NORMANDY DR
4
City-State-Zip: MIAMI BEACH FL 33141

Title VP
Name VALDES , SONIA
Address 5400 SW 77 CT
3 A
City-State-Zip: MIAMI FL 33155

Title S
Name BERRIOS , WALBERTO
Address 2517 NW 21 ST TERR
9
City-State-Zip: MIAMI FL 33142

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: ISMELDA BLANCO

P

04/21/2022

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 14

**2022 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL
REPORT**

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

Current Principal Place of Business:

2100 W 76 ST
304
HIALEAH , FL 33016

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: 47-3824123

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

BLANCO , ISMELDA
3710 ESTEPONA AV
3
MIAMI, FL 33178 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: ISMELDA BLANCO

05/06/2022

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name BLANCO , ISMELDA
Address 1775 NORMANDY DR
4
City-State-Zip: MIAMI BEACH FL 33141

Title S
Name BERRIOS , WALBERTO
Address 2517 NW 21 ST TERR
9
City-State-Zip: MIAMI FL 33142

Title VP
Name VALDES , SONIA
Address 5400 SW 77 CT
3 A
City-State-Zip: MIAMI FL 33155

Title DIRECTOR
Name CASTAÑEDA, FERMIN SR.
Address 7348 W 20TH AVE
City-State-Zip: HIALEAH FL 33016

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: SONIA VALDES

VP

05/06/2022

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 15

**2022 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL
REPORT**

DOCUMENT# N12000006801

Entity Name: WORLD FEDERATION OF PASTORS AND MINISTERS OF THE
FULL GOSPEL, INC.

Current Principal Place of Business:

2100 W 76 ST
304
HIALEAH , FL 33016

Current Mailing Address:

P.O. BOX 669371
MIAMI, FL 33166

FEI Number: 47-3824123

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

BLANCO , ISMELDA
3710 ESTEPONA AV
3
MIAMI, FL 33178 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: ISMELDA BLANCO

08/23/2022

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title P
Name BLANCO , ISMELDA
Address 1775 NORMANDY DR
4
City-State-Zip: MIAMI BEACH FL 33141

Title VP
Name VALDES , SONIA
Address 5400 SW 77 CT
3 A
City-State-Zip: MIAMI FL 33155

Title S
Name BERRIOS , WALBERTO
Address 2517 NW 21 ST TERR
9
City-State-Zip: MIAMI FL 33142

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: ISMELDA BLANCO

P

08/23/2022

Electronic Signature of Signing Officer/Director Detail

Date

ATTACHMENT 16

DECLARATION

I, Ismelda Blanco, hereby state under penalty of perjury as follows:

1. I am the current President and a Director of World Federation of Pastors and Ministers of the Full Gospel, Inc., applicant for a new noncommercial FM broadcast station to serve Country Squire Lakes, Indiana, as well as other NCE stations. The Board of World Federation is as follows:

Walberto Berrios
Sonia Valdez
Ismelda Blanco

Fermin Costaneda was also a member of the Board from May 6, 2022 – August 22, 2022. He has worked as an accountant for World Federation, and in light of the confusion being generated by his service as a Member of the Board, he resigned on August 22, 2022.

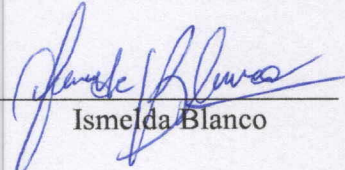
2. The Founder of World Federation of Pastors and Ministers of the Full Gospel, Inc. is Nestor Gabriel Kost. He no longer serves as a director or officer of World Federation of Pastors and Ministers of the Full Gospel, Inc., insofar as he resigned those positions in October 2021, prior to the time World Federation of Pastors and Ministers of the Full Gospel, Inc. filed its most recent applications with the FCC. He serves only as an advisor to World Federation of Pastors and Ministers of the Full Gospel, Inc. Mr. Kost retains no control over the organization, and the Board's affairs are wholly under the control of the current Board of Directors.

3. World Federation of Pastors and Ministers of the Full Gospel, Inc. has no involvement in the affairs of Llamados Para Triunfar, Inc. (who I understand is the licensee of Station WVKG-LP); Multimedia America, Inc. (who I understand is the licensee of Station licensee of Station WQPN-LP); American Network Media, Inc. (who I understand is the licensee of Station licensee of Station WNGK-LP); Radio Voz Mundial, Inc. (who I understand is the licensee of Station licensee of Station WPSI-LP), or C.E.L.A. International University Inc.

4. I have been shown the web site located at <https://brunosky27.wixsite.com/worldfederation/vision>. I am not familiar with that web site. It appears to be an old web site containing information from before the current Board's involvement. The site should not be relied upon, insofar as it contains incorrect information.

I declare under penalty of perjury that the forgoing is true and correct.

August 24, 2022



Ismelda Blanco

Attachment 17

WORLD FEDERATION OF PASTORS AND MINISTERS OF THE FULL GOSPEL ([HTTP://WWW.WFPMFG.COM/](http://www.wfpmfg.com/))

[HOME \(HTTP://WWW.WFPMFG.COM/\)](http://www.wfpmfg.com/)

[ABOUT US \(HTTP://WWW.WFPMFG.COM/ABOUT-US/\)](http://www.wfpmfg.com/about-us/)

[CONTACT US \(HTTP://WWW.WFPMFG.COM/CONTACT-US/\)](http://www.wfpmfg.com/contact-us/)

CONNECTING MINISTERS AROUND THE WORLD

[Learn More \(about-us\)](http://www.wfpmfg.com/about-us/)

CONTINUE THE WORK!

We continue to grow our network of Pastors and Ministers to better connect

... continues to grow our network of pastors and ministers to better connect with each other. With our help, you can help grow your ministry in your local community. Our members work hard to extend their knowledge in helping you grow with their dedicated passion, always following the word of God first.

SOLUTIONS

We pride ourselves in working with ministers from across the globe. With the tools and resources to help spread the message and create community outreach programs.

[Read more \(about-us\)](#)

GROWTH

We believe that together we can accomplish more. With that same idea in mind, we want to create a network of Pastors, Ministers and churches in every city and community to grow together the kingdom of Christ.

[Read more \(about-us\)](#)

EXPERT TEAM

We're constantly recruiting among the best and most knowledgeable to help growing or struggling ministries achieve their greatest potential and serve a more impactful purpose in their communities.

[Read more \(about-us\)](#)

TESTIMONIALS

This organization has helped me connect with other pastors in my area of New York, and create new outreach programs for our communities. Spreading the word of God and helping those in need is our main goal

every day.



FELICIA VALERA

NEW YORK

Our campaigns to reach our poorer communities in Brazil has been been possible with the help of World Federation of Pastors. Their network of ministers has helped us create seminars and teach our members the importance of our presence in our city.





ALVARO DE SA

BRAZIL – MIAMI

MEET OUR TEAM

Pastors from all around have gathered their experience and knowledge of the word to expand onto others. Meet our wonderful team of Ministers.

[Learn More \(about-us\)](#)

ISMELDA BLANCO

PRESIDENT

SONIA VALDES

VICE PRESIDENT

WALBERTO BERRIOS

SECRETARY

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WORLD FEDERATION OF PASTORS AND MINISTERS OF THE FULL GOSPEL ([HTTP://WWW.WFPMFG.COM/](http://www.wfpmfg.com/))

[HOME \(HTTP://WWW.WFPMFG.COM/\)](http://www.wfpmfg.com/)[ABOUT US \(HTTP://WWW.WFPMFG.COM/ABOUT-US/\)](http://www.wfpmfg.com/about-us/)[CONTACT US \(HTTP://WWW.WFPMFG.COM/CONTACT-US/\)](http://www.wfpmfg.com/contact-us/)

ABOUT US ([HTTP://WWW.WFPMFG.COM/ABOUT-US/](http://www.wfpmfg.com/about-us/))

OUR MISSION

Our mission is to help and build every man and woman of God called to serve Him, respecting the vision of action that the Lord has given him or her. We don't want to be an organization that stops any ministry, but on the contrary, provide tools through Seminars, Bible Studies, University Degree of training for Ministers to obtain Associates, Bachelors, Masters and Doctorates.

We can also provide training, if the Minister requests, for their churches through Bible Studies for training in Discipleship, Leadership and Consolidation. Within this Mission we want to open doors to the Pastors and Ministers in other countries, contacting them with other ministries and eventually exchange ideas and support. There are ministries that are strong in a specific area and to enable an approach and recommendation through the World Federation of Pastors, we can collaborate with each other and thus



advance simultaneously.



ISMELDA BLANCO

PRESIDENT



Ms. Ismelda Blanco has over 30 years working in the ministry. She is a proud Cuban-American, who saw first hand the struggle of a community without faith and without local leaders to provide help. Her vision has always been to help those in need first. Her message follows the word of Christ and puts forth teaching morals and values cemented in that word.

Through World Federation of Pastors and Ministers of the Full Gospel, Ms. Blanco's main goal is to offer her years of experience to other ministers and teach the new generation how to reach their communities.

Her work to create a larger network of ministries is the vision she hopes to achieve in the near future.



CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that a copy of the foregoing “Opposition to Petition to Deny” is being provided by First Class Mail to the following:

Donald E. Martin, Esq.
Law Office of Donald E. Martin
P.O. Box 8433
Falls Church, VA 22041

Bruce Quinn
Community Radio for Hoosiers, Inc.
211 North Bluff St.
Monticello, IN 47960

Kenneth C. Hill
Appalachian Educational Community Corporation
2175 Highway 75
Suite 6
Blountville, TN 37617

Cary S. Tepper, Esq.
4900 Auburn Ave.
Suite 100
Bethesda, MD 20814

Martin Hensley
New Beginnings Movement Inc.
900 W. Powers St.
Muncie, IN 47305

_____/Dan J. Alpert_____
Dan J. Alpert