

July 6, 2023

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

RE: FCC File No. 167104 Vida Ministry Inc. (FCC MX Group 200)

**SUPPLEMENT TO PETITION FOR RECONSIDERATION**

**Vida Ministry, Inc. failed to disclose its attributable interest in KHGF-LP.**

Vida Ministry, Inc. (“Vida”), tentative selectee of FCC MX Group 200, did not disclose that its 75% voting interest director “Zulma Nava Sanchez” has an attributable interest in station KHGF-LP Houston, Texas (Facility 195789). “Zulma Nava Sanchez” is shown having 51% voting interest in KHGF-LP in the organizational chart in LMS File Number 0000135258 and is shown to have the title of President in the certification of the currently active KHGF-LP license. The phone number (832) 233-8128 that appears in the Vida application is the same number listed in the current KHGF-LP LMS facility record. The same “Zulma Nava Sanchez”, the phone number (832) 233-8128, and e-mail “zulmanavasanchez@gmail.com” that are listed in the Vida application File No. 167104 appear throughout numerous application filings for KHGF-LP:

**0000135258 (February 10, 2021)**

**0000142394 (April 1, 2021)**

**0000137255 (March 1, 2021)**

**0000142395 (April 1, 2021)**

Therefore, Vida’s “No” certification to the questions “Does the applicant **or any party** to the application have an attributable interest in any other broadcast station(s)” was FALSE and misleading because a party to the application has a majority interest in KHGF-LP. Furthermore, Vida did not pledge to divest KHGF-LP should it be awarded a construction permit in any of its 10 applications filed during the 2021 NCE-FM window. The fact that Vida has undisclosed

interests in a least one other broadcast station is material to the outcome of MX Group 200 because Vida claims two points for diversity of ownership which does not consider KHGF-LP and the Commission accepted Vida's false certification that "it has no attributable interests in any radio authorization" when in fact the majority party to the Vida application has a majority interest in KHGF-LP Houston, Texas. The points awarded on these two false claims were dispositive in the Commission's determination of Vida as the tentative selectee.

**Vida Ministry, Inc. will not advance its own Educational Objective.**

Vida was required to "provide an exhibit showing that it has an educational objective and that the station will be used for the advancement of an educational program that will further that objective...." Vida provided an "Educational Statement" listing the objectives of a completely different organization "**Centro Cristiano de Vida Eterna San Antonio Texas**" which also filed multiple applications during the 2021 NCE-FM window under FRN 0031606387.<sup>1</sup> The "Educational Statement" in all five of the FRN 0031606387 "Vida Eterna" applications are identical to the statements in the ten Vida Ministry, Inc. (FRN 0031609308) applications. The combined fifteen applications filed during the NCE window provided the exact same Educational Statement naming "**Centro Cristiano de Vida Eterna San Antonio Texas**", and no applications stated the educational objectives of Vida Ministry, Inc.<sup>2</sup> Therefore, Vida Ministry, Inc., tentative selectee of MX Group 200 has not established its basic qualifications to become the license of the ten non-commercial educational stations that it proposes.

Sincerely,



Robert J. Robbins, Ph.D.

President and General Manager

Call Communications Group, Inc.

P.O. Box 561832

Miami, Florida 33256-1832

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<sup>1</sup> Applications filed by Centro Cristiano de Vida Eterna San Antonio Texas (FRN 0031606387): 0000167133, 0000167129, 0000167134, 0000167130, 0000167127

<sup>2</sup> The attachment file name "EDUCATIONAL STATEMENT CCVE SAN ANTONIO TEXAS.pdf" with the words "San Antonio, Texas" in ten applications should have been an obvious "red flag."

# Excerpts from Vida Ministry, Inc. Application File Number: 0000167104

## Applicant Information

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### Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
Vida Ministry Inc.	7314 Birchtree Forest Dr. Houston, TX 77088 United States	+1 (832) 233-8128	zulmanavasanchez@gmail.com	Not-for-Profit

## Attributable Interest

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Section	Question	Response
Equity and Financial Interests	Applicant certifies that equity and financial interests not set forth by the applicant parties are non-attributable.	Yes
Other Authorizations	Does the applicant or any party to the application have an attributable interest in any other broadcast station(s).	No

I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.

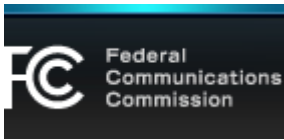
Zulma Sanchez  
President

11/08/2021

## Attachments

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File Name	Uploaded By	Attachment Type	Description
DA-23-358A1.pdf	Internal	All Purpose	DA 23-358 Letter released 04/27/2023.
Diversity.pdf	Applicant	Point System Factor/Tie Breakers	
EDUCATIONAL STATEMENT CCVE SAN ANTONIO TEXAS.pdf	Applicant	Eligibility Certifications	
Engineering General Statement v1.pdf	Applicant	Technical Certifications	Engineering Statement



# Renewal of License

Authorization

Reference Copy      FAQ

File Number: **0000142394** | Submit Date: **04/01/2021** | Call Sign: **KHGF-LP** | Facility ID: **195789** | FRN: **0023129919** | State: **Texas** | City: **HOUSTON**  
Service: **FL** | Purpose: **Renewal of License** | Status: **Granted** | Status Date: **07/22/2021** | Expiration Date: **08/01/2029** | Filing Status: **Active**

APPLICATION SECTIONS

General Information

Fees, Waivers, and Exemptions

Applicant Information

Contact Representatives

Renewal Certification

AM/FM/LPFM Certification

Other BroadCast Stations

FM Translator Certifications

Certification

Attachments

General Information

Section	Question	Response
Attachments	Are attachments (other than associated schedules) being filed with this application?	No

Fees, Waivers, and Exemptions

Section	Question	Response
Waivers	Does this filing request a waiver of the Commission's rule(s)?	No
	Total number of rule sections involved in this waiver request:	

Applicant Information

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Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
FUNDACION ARTE CATOLICO CHRISTIANO Doing Business As: FUNDACION ARTE CATOLICO CHRISTIANO	12680 W. LAKE HOUSTON, PKWY SUITE 500/PMB 132 HOUSTON, TX 77044 United States	+1 (832) 233-9128	fundacioncatolicocristiano@gmail.com	Not-for-Profit

Contact Representatives (1)

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Contact Name	Address	Phone	Email	Contact Type
Dan J Alpert <i>Legal Counsel</i> THE LAW OFFICE OF DAN J. ALPERT	2120 21st Rd. N Arlington, VA 22201 United States	+1 (703) 243-8690	DJA@COMMLAW.TV	Legal Representative

Renewal Certification

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Section	Question	Response
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Section	Question	Response
Character Issues	Licensee certifies that neither the licensee nor any party to the application has or has had any interest in, or connection with, any broadcast application in any proceeding where character issues were left unresolved, or were resolved adversely against the applicant or any party to the application;	Yes
	Licensee certifies that neither the licensee nor any party to the application has or has had any interest in, or connection with, any pending broadcast application in which character issues have been raised..	Yes
Adverse Findings	Licensee certifies that, with respect to the licensee and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any laws related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	Yes
FCC Violations during the Preceding License Term	Licensee certifies that, with respect to the station(s) for which renewal is requested, there have been no violations by the licensee of the Communications Act of 1934, as amended, or the rules or regulations of the Commission during the preceding license term. If "No", the licensee must submit an explanatory exhibit providing complete descriptions of all violations.	Yes
Ownership	The licensee certifies that, with respect to the station(s) for which renewal is requested, it complied with 47 CFR Section 73.3555.	Yes
Alien Ownership and Control	Licensee certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.	Yes
Non-Discriminatory Advertising Sales Agreements	Commercial licensee certifies that its advertising sales agreements do not discriminate on the basis of race or ethnicity and that all such agreements held by the licensee contain non-discrimination clauses. Noncommercial licensees should select "not applicable."	N/A

AM/FM/LPFM Certification

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Section	Question	Response
Biennial Ownership Report	Licensee certifies that the station's Biennial Ownership Report (FCC Form 323 or 323-E) has been filed with the Commission, as required by 47 C.F.R. Sections 73.3615 and 74.797.	
EEO Program	The station's Broadcast EEO Program Report (FCC Form 396), has been filed with the Commission, as required by 47 C.F.R. Section 73.2080(f)(1).	File Number:
	The station has posted its most recent Broadcast EEO Public File Report on the station's website, as required by 47 C.F.R. Section 73.2080(c)(6).	
Online Public Inspection File	Licensee certifies that the documentation required by 47 C.F.R. Section 73.3526 or 73.3527, as applicable, has been uploaded to the station's public inspection file as and when required.	

Section	Question	Response
Adherence to Minimum Operating Schedule	Licensee certifies that, during the preceding license term, the station has not been silent (or operating for less than its prescribed minimum operating hours) for any period of more than 30 days.	Yes
Silent Station	Licensee certifies that the station is currently on the air broadcasting programming intended to be received by the public.	Yes
Discontinued Operations	Licensee certifies that during the preceding license term, the station has not been silent for any consecutive 12-month period.	Yes
Environmental Effects	Licensee certifies that the specified facility complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments.	Yes

Other BroadCast Certifications

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Section	Question	Response
Other BroadCast Certifications	Does this application include one or more FM translator station(s) or TV translator station(s) or LPTV station(s), in addition to the station listed at the top of this section?	No

FM Translator Certifications

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You have not selected any Other Broadcast Station.

Certification

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Section	Question	Response
General Certification Statements	The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).	
	The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR §1.2002(b), for the definition of "party to the application" as used in this certification §1.2002(c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	

Section	Question	Response
Authorized Party to Sign	<b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b> Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application. <b>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</b>	
	I certify that this application includes all required and relevant attachments.	Yes
	I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.	<b>Zulma Nava Sanchez</b> <b>President</b>
		04/01/2021

Attachments

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Information not provided.

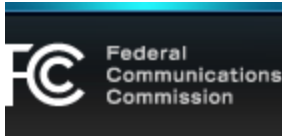
Federal Communications Commission  
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Washington, DC 20554  
  
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Fax: 1-866-418-0232  
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# Licensing and Management System

[Search](#) | [Log In](#)

Facility ID:195789

**KHGF-LP**

Station Type: | Community: **HOUSTON, TX**

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[FACILITY DETAILS](#)

[FACILITY TECHNICAL DATA](#)

## Channel and Facility Information

Service:	Low Power FM	Class:	LP100
Facility Type:	Noncommercial Educational	Primary Station:	
Facility Status:	LICENSED		
Status Date:	04/12/2018		
License Expiration Date:	08/01/2029		
Off-air Date:			

## Licensee

Name:	FUNDACION ARTE CATOLICO CHRISTIANO
Title:	
Address:	12680 W. LAKE HOUSTON, PKWY SUITE 500/PMB 132 HOUSTON, TX 77044 US
Phone:	+1 (832) 233-8128
Email:	fundacioncatolicocristiano@gmail.com

## Contact Representative

Name:	Dan J Alpert
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## EDUCATIONAL STATEMENT

OUR MAIN FOCUS FOR **CENTRO CRISTIANO DE VIDA ETERNA SAN ANTONIO TEXAS** IS TO ALLOW THE PUBLIC TO SHARE THEIR IDEAS ON WHAT THE COMMUNITY NEEDS THE MOST AND HOW WE SHOULD ACCOMPLISH THOSE NEEDS, OUR RADIO IS GOING TO MAKE SURE THE PUBLIC'S VOICE IS HEARD AND NOTICED. LET THE COMMUNITY KNOW THEY HAVE SOMEONE IN THEIR SIDE AND THAT WE ARE WILLING TO GO WHERE NO OTHER MEDIA OUTLET HAS GONE BEFORE, OUR RADIO STATION WILL HELP THIS COMMUNITY BY BROADCASTING LOCAL NEWS, AND ENTERTAINMENT AND ALSO OFFERING COUNSELING ADVICE AND BY SPREADING THE WORD OF GOD. OUR AUDIENCE WILL ALSO BE ALLOW TO CALL AND MAKE REQUEST OF THINGS THEY WANT TO HEAR , AND OR SAY. ALSO WE WILL SEEK OF WAYS TO HELP THE PUBLIC BY ANNOUNCING THE WAYS THE PUBLIC WOULD LIKE TO HELP OUT THEIR COMMUNITY.

BROADCAST COMMUNITY CENTERS OR STORES, FOOD BANKS, AND SHELTERS THAT ARE WILLING TO HELP OF THE COMMUNITY FOR FAMILIES IN NEED.

BROADCAST THE PUBLIC'S OPINIONS IN ( ' YOUR OPINIONS MATTERS') AND ALLOW THEM TO HELP EACH OTHER OUT BY LETTING THEM ANNOUNCE THEIR IDEAS.

ESTABLISH A HELP PROGRAM THAT WILL ALLOW THE COMMUNITY TO BRING IN IDEAS AND COMPLAINS THAT THEY MIGHT HAVE AND ALL FOR THE BETTER GOOD OF THE COMMUNITY AND OUR HELP PROGRAM WILL ASK THE PUBLIC FOR VOLUNTEERS SO THEY CAN PARTICIPATE IN A ACT OF GOODNESS.

SEEK FOR VOLUNTEERS THAT ARE WILLING TO HELP WITH CHILDCARE AND FOR CARE FOR SPECIAL NEEDS KIDS, WITH THIS WE WILL WOULD PROVIDE BACKGROUND CHECKS AND SAFETY PROCEDURES.

ANNOUNCE OF WAYS THAT WE CAN REACH AN IMPORTANT VOICE SO WE CAN HELP ESTABLISH MORE SCHOOLS FOR SPECIAL NEEDS.

ENCOURAGE THE COMMUNITY TO GET CONNECTED AND INFORMED ON WHAT GOES ON IN THEIR COMMUNITY AND WHAT ARE THE THINGS THEY CAN DO TO IMPACT A CHANGE.

OUR MAIN GOAL IS TO MAKE AN IMPACT FOR OUR COMMUNITY FOR A BETTER FUTURE AND FOR A BETTER LIVING.