



Federal Communications Commission
Washington, D.C. 20554

February 26, 2016

In Reply Refer to:
1800B3-TH

Mekadesh Group Corporation
2605 Hyacinth Drive
Mesquite, TX 75181

In re:

Channel 286, Sanderson, TX
Facility ID No. 198750
File No. BNPH-20151013AIX

Channel 264, Crosbyton, TX
Facility ID No. 198751
File No. BNPH-20151013AIY

Channel 259, Encinal, TX
Facility ID No. 198752
File No. BNPH-20151013AIZ

Channel 297, Junction, TX
Facility ID No. 198753
File No. BNPH-20151013AIB

Channel 293, Knox City, TX
Facility ID No. 198754
File No. BNPH-20151013AIC

Channel 299, Richland Springs, TX
Facility ID No. 198755
File No. BNPH-20151013AJD

Channel 260, Spur, TX
Facility ID No. 198756
File No. BNPH-20151013AJE

Channel 244, Turkey, TX
Facility ID No. 198757
File No. BNPH-20151013AJF

Applications for Construction Permit

Dear Applicant:

We send this letter pursuant to 47 CFR § 73.3514(b) to inquire about certain matters regarding the ownership and control of Mekadesh Group Corporation (MGC) and its stockholder, Guel Family

Trust (Family Trust). We have before us the referenced applications (Applications) seeking construction permits for new full-service commercial educational (NCE) FM stations.¹

MGC lists as its officers certain individuals who are officers of Hispanic Christian Community Network, Inc. (HCCN) or Hispanic Family Christian Network, Inc. (HFCN). MGC lists its sole stockholder as Family Trust, with an address listed that is the address commonly used in filings by HCCN and Antonio Cesar Guel, the sole stockholder of HCCN. We are seeking additional information relevant to the issues of ownership and control of MGC and Family Trust and the information submitted by MGC, HCCN and HFCN in their pending applications.²

Accordingly, we request that MGC supply the following information:

1. *Other Authorizations*
 - a. Exhibit 3 of each of the Applications lists seven permits or licenses for full-service FM stations, but does not appear to list “all other broadcast stations in which applicant or any party to the application has an attributable interest.”³ Submit a copy of an amendment to each of the Applications that: (i) identifies (with call letters, if available, Facility ID numbers, and station location) all broadcast stations or authorizations in which MGC or any party to the Applications holds an interest of any type; (ii) describes the interest; and (iii) if that interest was not listed in the Applications, fully explain the basis for not listing such interest in response to Section II, Question 3.
2. *Character Issues*
 - a. Submit a copy of an amendment to each of the Applications providing the information required by Section II, Question 5, with respect to the pending Informal Objection by REC Networks and the pending Petition to Deny filed by Common Frequency, Inc. relating to various low power FM applications filed by various non-profit corporations established in 2013 by Antonio Cesar Guel, with Maria C. Guel as the registered agent.⁴
 - b. Fully explain why this information was not submitted in the Applications.
3. *Familial Relationships, Citizenship Information and Income Information*
 - a. Describe all familial relationships among Antonio Cesar Guel, Maria C. Guel, Cesar A. Guel, Ana K. Guel, Jennifer Juarez and Omar Vazquez.
 - b. For each of those individuals, provide documentation of United States citizenship or explain the reason any such documentation is not available.

¹ See *Winning Bidders Announced for Auction 98*, Public Notice, DA 15-904 (WTB/MB rel. Aug. 12, 2015).

² 47 CFR § 73.3514(b); see also *BBC License Sub, L.P.*, Order, 10 FCC Rcd 2458, 2461 (MMB 1994). For any response that includes an individual’s social security number, you may delete all but the last four digits of the number.

³ FCC Form 301, Section II, Question 3.

⁴ See Common Frequency, Inc. Petition to Deny (filed Jan. 9, 2014) at 2; REC Networks Informal Objection (filed Dec. 2, 2013) at 3.

- c. For each of those individuals, provide complete copies of all of his or her W-2 Forms, 1041 Forms, 1099 Forms and Schedule K-1 Forms for 2013, 2014 and 2015.
4. *Corporate and Trust Records*
 - a. For MGC, HCCN and HFCN, provide complete copies of all articles of incorporation, bylaws, resolutions, minutes of corporate meetings (including any notes, calendars, emails or other records of corporate meetings kept by the corporation or any of its officers or directors), unanimous consents, stock registers, filings with the Secretary of State of Texas or any other jurisdiction in which the corporations do business, and any amendments or addenda to any such records, for the period from January 1, 2013, to the present.
 - b. For Family Trust, provide complete copies of all trust documents, including the trust agreement or deed of trust and all documents relating to the appointment of any trustees and the designation of any beneficiaries.
5. *Financial Records*
 - a. Provide complete copies of all financial records for January 1, 2015, to the present for MGC and Family Trust.
 - b. Provide complete copies of all financial records for January 1, 2015, to the present for each person or entity that (i) provided funds to MGC or Family Trust, directly or indirectly, or (ii) made any payment on behalf of MGC or Family Trust or for the benefit of MGC or Family Trust.
 - c. Provide complete copies of all financial records for January 1, 2013, to the present for HCCN and HFCN.

MGC's responses shall be signed under penalty of perjury and are due on or before March 28, 2016 (30 days from the date of this letter). Failure to respond in a timely manner may result in the Applications being dismissed pursuant to the provisions of Section 73.3568(a)(1) of the Commission's Rules.⁶

Sincerely,



Peter H. Doyle
Chief, Audio Division
Media Bureau

cc: Dan J. Alpert, Esq.

⁵ As used in this letter, the term "financial records" means copies of all monthly statements from any financial institution showing payments received by (or deposits credited to) the named entity and payments made by the named entity.

⁶ 47 CFR § 73.3568(a)(1).