



Federal Communications Commission
Washington, D.C. 20554

January 23, 2017

Michael Couzens
Michael Couzens Law Office
6536 Telegraph Avenue, Suite B201
Oakland, CA 94609

Re: Petition to Deny License Renewals of Hispanic Christian Community Network, Inc.

Dear Mr. Couzens:

On September 2, 2014, you filed a Petition to Deny objecting to the grant of the applications for license renewal of the following low power television (LPTV) stations formerly licensed to Hispanic Christian Community Network, Inc. (HCCN):

- KJPO-LD, Parker, AZ (Fac. ID No. 128085), File No. BRDTL-20140602AUI
- KRPO-LD, Quartzite, AZ (Fac. ID No. 128964), File No. BRDTL-20140602AUH
- KZVE-LP, Littlefield, AZ, (Fac. ID No. 128465), BRTTL-20140602AUG
- KXTY-LP, Ely, NV (Fac. ID No. 130016), BRTTL-20140602AUF
- K11WE, Tonopah, NV (Fac. ID No. 127636), BRTVL-20140602AUE
- K13YU, Tonopah, NV (Fac. ID No. 127633), BRTVL-20140602AUD
- KJKC-LP, Tonopah, NV (Fac. ID No. 127629), BRTTL-20140602AUB
- K46JY, Kemmerer, WY (Fac. ID No. 128715), BRTTL-20140602AYO
- K39JU, Jackson, WY (Fac ID No. 126439), BRTTL-20140602AUC
- KHDE-LP, Laramie, WY (Fac. ID No. 128721), BRTTL-20140602ATZ

The Petition at issue requests denial of these license renewal applications based on alleged misrepresentation and false certifications by Mr. Antonio Casear Guel concerning his citizenship. Mr. Guel was the 100% shareholder of HCCN. Specifically, the Petition discusses that as part of a court proceeding before the Los Angeles County Superior Court Mr. Guel stated, in writing, that he was not a U.S. citizen.¹ The Petition argues that not only does this answer conflict with certifications made in Commission applications,² but is also a violation of Section 310(b) of the Communications Act of 1934, which places restrictions on direct and indirect foreign ownership of broadcast licenses.³

As of November 30, 2016, the licenses of LPTV stations: KZVE-LP, KJKC-LP, K39JU, and K46JY have been canceled.⁴ With regards to the remaining stations listed in the Petition, it has come to

¹ Petition at 2 and Attachment A at 3.

² Petition at 3, citing broadcast media ownership reports, File Nos. BOA-20120503ABO and BOA-20131220HCO.

³ 47 U.S.C. § 310(b).

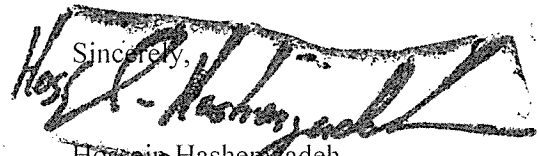
⁴ Letter from Hossein Hashemzadeh, Deputy Chief, Video Division, Media Bureau to Diane G. Reed, Trustee (Nov. 30, 2016). Letters available at: <https://enterpriseefiling.fcc.gov/dataentry/public/tv/publicFacilityDetails.html?facilityId=132692>.

the attention of Video Division (Division) staff that at the time of application the license renewal applications for those stations were filed, they were not licensed to HCCN. According Notices of Consummation filed by HCCN the low power television stations were licensed as follows:

- KRPO-LD, KXTY-LP, K11WE, K13YU, and KHDE-LP were licensed to Jennifer Juarez.⁵
- KJPO-LD was assigned to Iglesia Manmin Toda La Creacion USA Inc. (Iglesia).⁶

While the information provided in the Petition raises significant legal questions, in light and the facts and circumstances discussed above we are unable to provide the relief requested by the Petition. Not only have four of the applications been dismissed due to license cancellation, but the others were not licensed to HCCN or Mr. Guel.⁷

Accordingly, the Petition to Deny **IS DISMISSED** as moot. Our action should not be interpreted as a finding of fact or law regarding the substantive claims raised in the Petition. We retain the right to initiate, on our own motion, an investigation into the matters raised.

Sincerely,

Hossein Hashemi Zadeh
Deputy Chief, Video Division
Media Bureau

Cc: David Elmquist (via electronic mail)

⁵ See File No. BALTTTL-20100315AAS. HCCN filed a Notice of Consummation on November 10, 2014, stating that the assignment of KRPO-LP, KXTY-LP, K11WE, K13YU, and KHDE-LP to Jennifer Juarez was consummated on July 25, 2010. Jennifer Juarez has filed new license renewal applications for the aforementioned stations, all of which remain pending. See File Nos. BRDTL-20160412ABO; BRTTL-20160405AAQ; BRTVL-20160401AAX; BRTVL-20160411AAY; and BRTTL-20160331AEM.

⁶ See File No. BALTVL-20080811AAB. HCCN filed a Notice of Consummation on October 31, 2014, stating that the assignment of KJPO-LD to Iglesia was consummated on February 27, 2012. Iglesia has filed a new license renew application for this station, which remains pending. See File No. BRDTL-20160401ABC.

⁷ The Division plans to examine why HCCN filed license renewal applications in June 2014 and attempted to assign them to a third party in August 2014 even though in both instances HCCN was not the licensee of the stations. See File Nos. BALDTL-20140807ABF; BALTVL-20140807ACD; and BALTTTL-20140807A.