

Before the
Federal Communications Commission
Washington, DC 20554

Received & Inspected

SEP 15 2014

FCC Mail Room

RE: Application of)
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FUSION FAITH CENTER)
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)
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File No. BNPL-20131112AUC
Facility No. 195777
MX Group 286

RECEIVED
SEP 16 4 5:13

For Issuance of a Construction Permit for a
New LPFM Station to serve Albany, Oregon

Filed with: Office of the Secretary
Directed to: Chief, Media Bureau

OPPOSITION TO REQUEST OF TIME TO RESPOND

Fusion Faith Center is the properly selected Applicant as identified by the FCC selection process. Our 5 points won the CP, but for some reason YOU MATTER has failed to concede gracefully. The Commission has chosen, and there are winners and losers. Fusion Faith Center has become aware before receiving a mailing, that Dan Alpert, an Attorney for YOU MATTER has requested an extension of time to prepare a response to our opposition statements. YOU MATTER's opinions at this point should have no weight or standing. This is a purposeful delay tactic to prevent or delay granting a CP to FUSION FAITH CENTER.

WHEREAS: Fusion respectfully requests the FCC to dismiss the YOU MATTER application and without further delay issue a Construction Permit.

As we pointed out in our Opposition to the Petition To Deny, Filed against FUSION By YOU MATTER, They appear to not be a legal Oregon Corporation as they are in violation of ORS 65.307. They cannot fix this without changing over 50% of the listed Board members. In our opinion the YOU MATTER application should be dismissed immediately, thereby creating a Singleton which can be granted immediately.

Furthermore FUSION has written a letter to the Oregon Department Of Justice seeking to have the DOJ investigate the numerous and apparent shell corporations formed by Mr. Bob Lund which we believe may have been formed for the sole purpose of filing multiple LPFM applications.

A copy of the letter to the Oregon DOJ is attached.(EXHIBIT 1)

Respectfully submitted,
FUSION FAITH CENTER
by: Steve Bingenheimer
Pastor & President

FUSION FAITH CENTER
241 West 1st Street
Albany OR 97321

September 11th, 2014

**FUSION FAITH CENTER
BNPL-20131112AUC
OPPOSITION TO TIME EXTENSION
PAGE 2**

EXHIBIT 1 – COPY OF LETTER TO OR-DOJ



241 West First Avenue - Albany Oregon, 97321

Mr. Kirk Harvey
Chief Investigator
Charitable Activities Division
Oregon Department Of Justice
1515 SW 5th Avenue
Suite 410
Portland, OR 97201

September 11th, 2014

Dear Mr. Harvey;

"You Matter" was created October 2nd 2013 by Bob Lund acting as Registered Agent, showing an address of 240 Second Avenue, Albany OR 97321, File #968442-96.

The registration clearly shows that this corporation is for PUBLIC BENEFIT as the type of Oregon Corporation and has NO MEMBERS. One person is listed as the sole person in the corporation. That person is Deborah Martin also at an address of 240 Second Avenue #7, Albany Oregon 97321. 240 2nd Avenue is a business for profit location for Bob Lund. Page two lists the other non-profit corporations we found also filed by Mr. Lund.

Since proper organization is required by Oregon, "You Matter" is not complying with the requirements of Oregon Revised Statutes 65.307 which clearly states: *A board of directors must consist of one or more individuals for a mutual benefit or religious corporation and three or more individuals for a public benefit corporation.*

We believe that Mr. Lund is really behind control of "You Matter" and several other "dummy" corporations all created in this same manner and all for the purpose of creating FCC applications for new LPFM Radio Stations. The FCC has rules pertaining to hidden attributable interest which seems to be violated by these applications. A listing of Lund filed FCC application is on the second page.

You Matter has hired an attorney, Dan J. Alpert in VA to represent them in filing the original FCC 318 forms, applications for new LPFM Stations and continues to represent You Matter in filing Petitions to Deny and other hindering communications with the FCC. It is my belief that Mr. Alpert is really representing Mr. Lund, whom we believe is paying the attorney fees. This, if true would also point to the fact that the non-profit filings of You Matter and others by Mr. Lund are corporate fronts created by Mr. Lund to "pull a fast one" on the Federal Communication Commission and The State Of Oregon.

Is it common for a Registered Agent to pay for an Attorney for the corporation when he is not a board member?

If the ORS Statute mentioned prohibits an improperly organized corporation from doing business, then all of the FCC applications Mr. Lund submitted should be dismissed and after investigating this blatant violation of Oregon Law, we ask the Oregon DOJ to contact the FCC regarding the dismissal of all of Mr. Lunds FCC Form 318 Applications.

(2)

Here is a listing of some of the other Oregon Corporate filings by Mr. Lund. Several of them use religious sounding names but are not organized that way.

- Sweet Home House Of Prayer - #975655-93
- The Bride Of Christ As One - #975659-99
- Cascadia Sound Waves - #961880-90
- You Matter - #968442-96
- Sweet Home All For One And One For All - #975648
- OHOP - #968443-95
- Green Peter Eclectic Tunez - #975654-94
- Futurist Prophetic Advancement - #977065-93
- Corvillian Waves - #968445-93
- Christian Youth Promotion And Advancement - #977059-91
- Blue Stone Media Activists - #961875-92
- All About Children - #975660-96
- A Life Worth Sustaining - #975657-91
- A Home For Everyone - #961879-93

Here are FCC filings using some of the above corporate names;

FCC File #	Facility #
BNPL20131112CGW	195693
BNPL20131112CGV	195688
BNPL20131113AEF	195728
BNPL20131113BAR	195734
BNPL20131113AHP	195944
BNPL20131114ANG	195948
BNPL20131113BQL	196966
BNPL20131113AAF	195746
BNPL20131112CGT	195752
BNPL20131112BEO	195367
BNPL20131114BKL	197352
BNPL20131114ATA	196954
BNPL20131114ANG	196948
BNPL20131114AIT	195750
BNPL20131113BPQ	196927
BNPL20131113AAH	195718
BNPL20131112CGR	195664
BNPL20131112CGP	195628
BNPL20131112CGN	195614
BNPL20131112CGJ	195412
BNPL-20131112CGX	195712

(3)

I request an investigation into these activities and that the Oregon DOJ contact Federal authorities concerning these filings. Mr. Lund also operates currently KRAD-LP radio station in Albany OR. This was a result of the first FCC LPFM filing window and is under the Oregon non-profit umbrella of Transformation International. This, we think, is why Mr. Lund created other corporate names, so he could ultimately build and operate a small network of LPFM stations, which would be against FCC rules.

I request a follow up response from your department indicating if you will be acting upon this complaint.

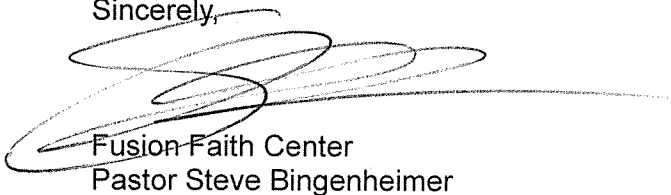
In the spirit of full disclosure, Fusion Faith Center was selected by the FCC over You Matter in the application for a new LPFM station in Albany Oregon. You Matter through Dan J. Alpert, Attorney, filed a Petition to Deny our application with the FCC.

We intend to file a copy of this letter with the FCC pertaining to our application, subsequent Petition to Deny, Our Opposition To The Petition to Deny and Attorney Alpert's request for an extension to reply.

It is our understanding that an improperly organized non-profit corporation in Oregon is not authorized to conduct business, make applications or other endeavors so long as the corporate structure as related to ORS 65.307 is not compliant.

Thank you for your time,

Sincerely,



Fusion Faith Center
Pastor Steve Bingenheimer

CERTIFICATE OF SERVICE

I, Steve Bingenheimer hereby certify that for the forgoing

Opposition for Time Extension is being served on the following by First Class Mail:

Bob Lund
YOU MATTER Registered Agent
240 2nd Avenue
Albany, OR 97321

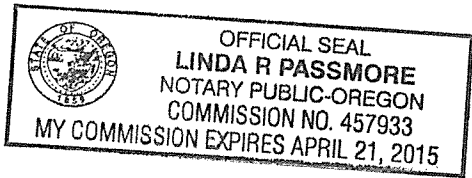
Dan J Alpert, Attorney
2120 N. 21st Road
Arlington, VA 22201

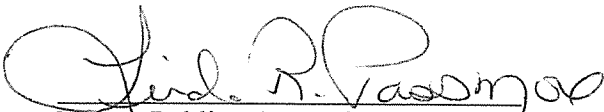
Pastor Steve Bingenheimer 

State of OREGON

County of Linn

Signed and sworn to (or affirmed) before me on September 11, 2014 by Linda Passmore.




Notary Public - State of Oregon