



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 June 30, 2014, you filed a Petition to Deny (Petition) 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):

- KZHO-LD, Houston, TX (Fac. ID No. 130345), File No. BRDTL-20140401AAJ
- KSFV-LD, Dallas, TX (Fac. ID No. 130934), File No. BRDVL-20140401AAR
- K23IA, San Angelo, TX (Fac. ID No. 130496), File No. BRTTL-20140602AUG
- KJTN-LP, Abilene, TX (Fac. ID No. 127351) File No. BRTTL-20140401AAZ
- KZAB-LP, Abilene, TX (Fac. ID No. 130088), File No. BRTTL-20140401AAX
- KZOD-LP, Odessa, TX (Fac. ID No. 130504), File no. BRTTL-20140401AAV
- KHFW-LD, Dallas, TX (Fac. ID No. 130952), File No. BRDVL-20140401AAT
- KEAM-LD, Amarillo, TX (Fac. ID No. 131091), File No. BRDTL-20140401AAP
- KXCO-LD, Refugio, TX (Fac. ID No. 127994), File No. BRDTL-20140401AAN
- KFYW-LD, Wichita Falls, TX (Fac. ID No. 132692), File No. BRDTL-20140401AAL

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 K23IA and KYWF-LD have been canceled.⁴ With regards to the remaining stations listed in the Petition, it has come to the attention of

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>.


Video Division (Division) staff that, at the time of application, the stations were no longer licensed to HCCN. According to Notices of Consummation filed by HCCN, the LPTV stations were licensed as follows:

- KEAM-LD, KZOD-LD, KXCO-LP, and KSFV-LP, were licensed to De Mujer A Mujer International (De Mujer);⁵
- KZAB-LP and KTJN-LP were licensed to Jennifer Juarez;⁶ and
- KHFW-LD and KZHO-LD were licensed to Iglesia Manmin Toda La Creacion USA Inc. (Iglesia).⁷

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 two of the applications been dismissed due to license cancellation, but the others were not licensed to HCCN or Mr. Guel.⁸

Accordingly, the Petition to Deny filed against the above listed applications for license renewal **IS DISMISSED**. Furthermore, on July 21, 2014, you filed a request for withdrawal of the Petition. In light of the findings above, the Request for Withdrawal **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 Hashemzadeh
Deputy Chief, Video Division
Media Bureau

Cc: David Elmquist (via electronic mail)

⁵ See File No. BALTVL-20090821ADV. HCCN filed a Notice of Consummation on November 11, 2014, stating that the assignment of KEAM-LD, KZOD-LP, and KXCO-LD to De Mujer was consummated on March 14, 2010. Jennifer Juarez has filed new license renewal applications for the aforementioned stations, all of which remain pending. See File Nos. BRDTL-20160401AAY; BRDTL-20160405AAR; BRDTL-20160412ABL; and BRDVL-20160331AEO, respectively.

⁶ See File No. BALTTTL-20100315AAS. HCCN filed a Notice of Consummation on November 10, 2014, stating that the assignment of KZAB-LP and KTJN-LD 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. BRTTL-20160412ABN and BRTTL-20160411AAZ, respectively.

⁷ See File No. BALTVL-20080811AAB. HCCN filed a Notice of Consummation on November 10, 2014, stating that the assignment KHFW-LD and KZHO-LD to Iglesia was consummated on February 27, 2012. Iglesia has filed new license renewal applications for the aforementioned stations, all of which remain pending. See File Nos. BRDVL-20150331AEN and BRDTL-20160405AAT, respectively.

⁸ The Division plans to examine why HCCN filed license renewal applications in April 2014 and also 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-20140807ABQ.