

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	EB Docket No. 03-152
	)	
<b>WILLIAM L. ZAWILA</b>	)	Facility ID No. 72672
	)	
Permittee of FM Station KNKS, Coalinga, California	)	
	)	
<b>AVENAL EDUCATIONAL SERVICES, INC.</b>	)	Facility ID No. 3365
	)	
Permittee of FM Station KAAX, Avenal, California	)	
	)	
<b>CENTRAL VALLEY EDUCATIONAL SERVICES, INC.</b>	)	Facility ID No. 9993
	)	
Permittee of FM Station KYAF, Firebaugh, California	)	
	)	
<b>H. L. CHARLES D/B/A FORD CITY BROADCASTING</b>	)	Facility ID No. 22030
	)	
Permittee of FM Station KZPE, Ford City, California	)	
	)	
<b>LINDA WARE D/B/A LINDSAY BROADCASTING</b>	)	Facility ID No. 37725
	)	
Licensee of FM Station KZPO, Lindsay, California	)	

To: Marlene H. Dortch, Secretary  
Attn: Chief Administrative Law Judge Richard L. Sippel

**ENFORCEMENT BUREAU'S MOTION TO COMPEL WILLIAM L. ZAWILA TO PROVIDE COMPLETE RESPONSES TO OUTSTANDING DISCOVERY REQUESTS**

1. On June 4, 2015, the Presiding Judge directed the parties to commence discovery on all issues set forth in the Order to Show Cause, Hearing Designation Order, and Notice of Opportunity for Hearing (*Order*).<sup>1</sup> In compliance with that *Order*, the Enforcement Bureau (Bureau) served its first set of interrogatories and first set of document requests on William L. Zawila (Mr. Zawila).<sup>2</sup> In total, the Bureau served 80 document requests and 98 interrogatories. Mr. Zawila did not, however, provide a single substantive response to *any* document request or interrogatory. Pursuant to Sections 1.323(c) and 1.325(a)(2) of the Commission's rules,<sup>3</sup> the Bureau therefore moves to compel Mr. Zawila to provide discovery responses.

2. Mr. Zawila's responses to the Bureau's discovery requests consist entirely of baseless objections.<sup>4</sup> For example, Mr. Zawila objects to nearly all of the Bureau's interrogatories and document requests as seeking information that is irrelevant and not calculated to lead to the discovery of admissible evidence.<sup>5</sup> Many of these discovery requests seek information concerning the efforts that Mr. Zawila, as a permittee, and the other named permittees (whom Mr. Zawila purports to represent) have taken to comply with the respective

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<sup>1</sup> See *Order*, FCC 15M-21 (ALJ, rel. June 4, 2015), at 2.

<sup>2</sup> See Enforcement Bureau's First Set of Interrogatories to Mr. Zawila, served Jul. 28, 2015, attached hereto as Exhibit A; Enforcement Bureau's First Set of First Set of Requests for Production of Documents to William L. Zawila, served Jul. 29, 2015, attached hereto as Exhibit B.

<sup>3</sup> See 47 C.F.R. §§ 1.323(c), 1.325(a)(2).

<sup>4</sup> See Responses to Enforcement Bureau's First Set of Interrogatories, served August 14, 2015 (two days late), attached hereto as Exhibit C; Responses to Enforcement Bureau's First Set of Requests for Production of Documents to Mr. Zawila, served on Aug. 11, 2015, attached hereto as Exhibit D.

<sup>5</sup> See, e.g., Exhibit C at Nos. 1-6, 13-95, and 98; Exhibit D at Nos. 9, 17-21, 30-40, 46-47, 51-55, 59-60, 68-80.

construction permits<sup>6</sup> – an issue which is central to the HDO.<sup>7</sup> Thus, this information is relevant and should be produced.

3. Another central issue in the HDO is whether the permittees maintained proper public inspection files in compliance with Section 73.3526 of the Commission’s rules.<sup>8</sup> Many of the Bureau’s document requests and interrogatories are directed to this issue, including straightforward requests to produce, for example, the permittees’ applications, permits, and construction authorizations,<sup>9</sup> and to explain where and whether such files were maintained.<sup>10</sup> Indeed, the Bureau specifically requested that Mr. Zawila produce “[d]ocuments constituting the [stations’] *Public Inspection Files*.”<sup>11</sup> Mr. Zawila refused to produce a single responsive document or respond to a single related interrogatory. Rather, Mr. Zawila objects to these discovery requests on the basis that the information is “already in the FCC’s files and records.”<sup>12</sup> This objection seeks to turn the Commission’s public inspection file requirements on their head, and would discharge permittees from the requirement to themselves maintain, and produce upon request, such files. The HDO requires the Presiding Judge to determine, in part, whether Mr. Zawila and the other permittees complied with the Commission’s public inspection file requirements.<sup>13</sup> As such, the Bureau is entitled to question whether Mr. Zawila and the other permittees he purports to represent maintained these documents, as required by the

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<sup>6</sup> See, e.g., Exhibit A at Interrogatory Nos. 12-17, 20, 23-24, 26, 27, 29, 37-42, 44-47, 49-52, 68-71; Exhibit B at Request Nos. 9-19, 23-30, 46-47, 51-55, 59-60.

<sup>7</sup> See, e.g., HDO at ¶ 113(b).

<sup>8</sup> See, e.g., HDO at ¶ 113(d); 47 C.F.R. § 73.3526. Section 73.3526(e) lists the contents to be retained in the public inspection file, and includes a requirement to retain a “copy of any application tendered for filing with the FCC.” See 47 C.F.R. § 73.3526(e)(2).

<sup>9</sup> See, e.g., Exhibit B at Request Nos. 1-3, 37-40, 48-50, 56-58, 61-65.

<sup>10</sup> See, e.g., Exhibit A at Interrogatory Nos. 80-89.

<sup>11</sup> See Exhibit A at Nos. 37-40 (emphasis added).

<sup>12</sup> See, e.g., Exhibit C at Nos. 1-3, 37-40, 48-50, 56-58, 61-65; Exhibit D at Nos. 80-89.

<sup>13</sup> See, e.g., HDO at ¶ 113(d).

Commission's rules, regardless of whether they may be in the Commission's records.

Accordingly, Mr. Zawila should be compelled to respond to the Bureau's requests.

4. Moreover, the HDO questions whether many documents – such as the Forms 854 certifying the completion of construction of the various stations at issue,<sup>14</sup> complete responses to the January 25, 2002 letter sent by the Media Bureau's Audio Division,<sup>15</sup> and complete responses to either the Commission's May 4, 2001 Official Notice of Violation and to the Commission's June 21, 2001 Continuation of Violation<sup>16</sup> – were ever provided to the Commission. Here again, Mr. Zawila objects to the Bureau's related document requests and interrogatories on the grounds that they seek "information already in the FCC's files and records."<sup>17</sup> For Mr. Zawila to now direct the Bureau to the Commission's own files when the HDO plainly questions whether Mr. Zawila or the other permittees ever submitted these documents to the Commission is patently evasive and non-responsive. Mr. Zawila should be compelled to provide the responsive information and/or documents, or concede that no such information or documents exist.

5. Lastly, Issues 113-114 in the HDO are directed to whether Mr. Zawila, acting "on behalf" of the named parties acted unlawfully.<sup>18</sup> Thus, the Bureau requested that Mr. Zawila demonstrate that he was authorized to act on behalf of these parties.<sup>19</sup> In response, Mr. Zawila claims attorney-client privilege.<sup>20</sup> The Bureau merely seeks to ascertain Mr. Zawila's status as a representative for these parties (and does not, for example, seek any legal advice he may have

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<sup>14</sup> See, e.g., HDO at ¶¶ 7, 24, and 33.

<sup>15</sup> See, e.g., HDO at ¶¶ 20, 30, 46, 63, 75.

<sup>16</sup> See HDO at ¶¶ 73-75.

<sup>17</sup> See, e.g., Exhibit C at Nos. 4-8, 41-45, 67; Exhibit D at Nos. 7-11.

<sup>18</sup> See HDO at ¶¶ 113-114.

<sup>19</sup> See Exhibit A at Interrogatory Nos. 58-67; see also Exhibit B at Request Nos. 71-80.

<sup>20</sup> See, e.g., Exhibit C at Nos. 58-67; Exhibit D at Nos. at 71-80.

provided to his clients). In addition, given that another attorney, Michael Couzens, has suggested that he, and not Mr. Zawila, is counsel for Avenal and Central Valley, these requests are relevant and appropriate and this information should be produced. Mr. Zawila also relies – without justification – on the attorney-client privilege in response to the Bureau’s request that he identify the individuals on whom he may rely at the hearing.<sup>21</sup> As guided by Rule 26 of the Federal Rules of Civil Procedure, at a minimum, the Bureau is certainly entitled to know if Mr. Zawila is aware of individuals with information that he deems relevant to his claims or defenses.<sup>22</sup> Moreover, the identification of the individuals Mr. Zawila expects to call at hearing is not privileged information and should be provided.

### **Conclusion**

6. Mr. Zawila is a named party in the HDO, and the purported representative for each of the remaining named parties. Mr. Zawila cannot simply refuse to engage in the discovery process. Indeed, it begs incredulity that he does not have a single document or any information responsive to the Bureau’s requests. For the reasons stated above, the Bureau respectfully requests that the Presiding Judge issue an order compelling Mr. Zawila to serve comprehensive responses to the Bureau’s first set of interrogatories and first set of document requests within 14 days.

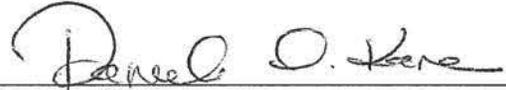
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<sup>21</sup> See Exhibit A at Interrogatory No. 98.

<sup>22</sup> See Fed. R. Civ. P. 26 (a)(1)(A)(i).

Respectfully submitted,

Travis LeBlanc  
Chief, Enforcement Bureau

A handwritten signature in black ink that reads "Pamela S. Kane". The signature is written in a cursive style with a large initial "P" and "K".

Pamela S. Kane  
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August 21 2015

## CERTIFICATE OF SERVICE

Alicia McCannon, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 21st day of August, 2015, sent copies of the foregoing "ENFORCEMENT BUREAU'S MOTION TO COMPEL WILLIAM L. ZAWILA TO PROVIDE COMPLETE RESPONSES TO OUTSTANDING DISCOVERY REQUESTS to:

The Honorable Richard L. Sippel  
Chief Administrative Law Judge  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554 (by hand, courtesy copy)

William Zawila, Esq.  
12600 Brookhurst Street, Suite 105  
Garden Grove, CA 92804-4833  
(714) 636-5040 (telephone)  
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Michael Couzens  
Michael Couzens Law Office  
6536 Telegraph Avenue  
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Alicia McCannon

# Exhibit A

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	EB Docket No. 03-152
	)	
<b>WILLIAM L. ZAWILA</b>	)	Facility ID No. 72672
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Permittee of FM Station KNKS, Coalinga, California	)	
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<b>AVENAL EDUCATIONAL SERVICES, INC.</b>	)	Facility ID No. 3365
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Permittee of FM Station KAAX, Avenal, California	)	
	)	
<b>CENTRAL VALLEY EDUCATIONAL SERVICES, INC.</b>	)	Facility ID No. 9993
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Permittee of FM Station KYAF, Firebaugh, California	)	
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<b>H. L. CHARLES D/B/A FORD CITY BROADCASTING</b>	)	Facility ID No. 22030
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Permittee of FM Station KZPE, Ford City, California	)	
	)	
<b>LINDA WARE D/B/A LINDSAY BROADCASTING</b>	)	Facility ID No. 37725
	)	
Licensee of FM Station KZPO, Lindsay, California	)	

To: William L. Zawila

**ENFORCEMENT BUREAU'S FIRST SET OF INTERROGATORIES  
TO WILLIAM L. ZAWILA**

1. Pursuant to Section 1.323 of the Commission's rules, 47 C.F.R. § 1.323, the Enforcement Bureau (Bureau) hereby submits the following Interrogatories to William L. Zawila (Mr. Zawila).

2. Mr. Zawila shall deliver its responses to the offices of the Investigations and Hearings Division, Enforcement Bureau, Suite 4-C330, 445 12<sup>th</sup> Street, S.W., Washington, D.C. 20554 (or at some other location that is mutually acceptable to the Bureau and Mr. Zawila) within 14 days of the date of these interrogatories.

3. The obligation of Mr. Zawila to answer these interrogatories is continuing in nature. Mr. Zawila has an obligation to provide in the future any and all additional responsive information that may come to its attention subsequent to its answering these interrogatories but not initially disclosed at the time, date and place set forth herein or in any supplemental answers that it submits. In this regard, Mr. Zawila must supplement its initial and supplemental responses if it learns that, in some material respect, the responses initially provided, or as supplemented, were incomplete or incorrect or if additional responsive information is acquired by or has become known after its initial or supplemental responses.

**DEFINITIONS**

For the purposes of this document, the following definition shall apply:

- a. "William L. Zawila" "Mr. Zawila" "you" and "your" shall mean William L. Zawila.
- b. "Avenal" shall mean Avenal Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest

or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

c. "Central Valley" shall mean Central Valley Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

d. "FCB" shall refer to The Estate of H.L. Charles d/b/a/ Ford City Broadcasting, H.L. Charles d/b/a/ Ford City Broadcasting, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

e. "Lindsay Broadcasting" shall refer to The Estate of Linda Ware d/b/a Lindsay Broadcasting, Linda Ware d/b/a Lindsay Broadcasting, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

f. "EAS" shall mean Emergency Alert System.

- g. “KNGS” means radio broadcast station KNGS (FM), Coalinga, California.
- h. “KAAX” means radio broadcast station KAAX (FM), Avenal, California.
- i. “KYAF” means radio broadcast station formerly known under call sign KAJP (FM), Firebaugh, California.”
- j. “KZPE” means radio broadcast station LZPE (FM), Ford City, California.
- k. “KZPO” means radio broadcast station KZPO (FM), Lindsay, California.
- l. “Act” shall mean the Communications Act of 1934, as amended.
- m. “Commission” or “FCC” shall mean the Federal Communications Commission.
- n. “WTB” shall mean the Wireless Telecommunications Bureau of the Commission.
- o. “Audio Division” shall mean the Audio Division of the Commission’s Media Bureau.
- p. “HDO” shall refer to the Order to Show Cause, Notice of Opportunity for Hearing, and Hearing Designation Order, released by the Commission on July 16, 2003 in EB Docket No. 03-152.
- q. “FCC Form 854” shall mean the FCC Form 854 used to register structures used for wire or radio communication service in any area where radio services are regulated by the Commission; to make changes to existing registered structures or pending applications; or to notify the Commission of the completion of construction or dismantlement of structures, as required by Title 47 of the Code of Federal Regulations, Chapter 1, Part 17 (FCC Rules Part 17) which can be located at <https://transition.fcc.gov/Forms/Form854/854.pdf>.
- r. “Public Inspection Files” shall mean those files identified in Section 73.3526 of the Commission’s Rules.
- s. “Rules” means the Commission’s regulations found in Title 47 of the Code of Federal Regulations.

t. The terms/phrases “referring to,” “relating to” and/or “concerning,” as used herein, shall be interpreted broadly and shall include, but not be limited to, the following meanings: constituting, comprising, evidencing, reflecting, respecting, discussing, referring to, stating, describing, recording, noting, considering, embodying, evaluating, analyzing, mentioning, containing, concerning, regarding, indicating, pertaining to, showing, bearing upon, studying, memorializing, or commenting upon, or any other term synonymous with or similar to the foregoing.

u. “State” and “describe” mean to set forth a complete and detailed statement of all information, circumstances and facts that refer to, relate to, reflect, comprise or bear upon the matter concerning which information is requested.

v. The terms “identify” and “identification” when used in reference to an individual person mean to state his full name, last known residence and business telephone numbers, last known residence and business addresses, and his present or last known title, position and business affiliation.

w. The terms “identify” and “identification” when used in reference to a person other than a natural person mean to state the full and official name of the business entity, its principal place of business, and the main telephone number of such business entity.

x. The terms “identify” and “identification” when used in reference to a document mean to state its date, type (e.g., memo, telecopy, email), and its authors, addressees, title, if any, and, if no title, a brief description of the subject matter of the document and its present or last known location and custodian. If any document once was, but is no longer, in your possession, custody, or control, state what disposition was made of it and the reason for such disposition.

y. The terms “identify” and “identification” when used in reference to any act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication, mean to: (a) describe the nature and substance of the act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication; (b) state the date when and place where it occurred; and (c) identify each person who was a participant therein.

z. The term “and” also means “or” and the term “or” also means “and.”

aa. The term “each” also means “every” and the term “every” also means “each.”

bb. The term “all” also means “any” and the term “any” also means “all.”

cc. The term “document” means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form) in the possession, custody, or control of Mr. Zawila.

dd. "Discussion" means any assembly, congregation, encounter, meeting or conversation between or among two or more individuals for any purpose, whether or not planned, arranged, or scheduled in advance. "Discussion" includes, without limitation, all oral communications, whether or not in person, by telephone (including voicemails and similar recordings), or otherwise, and electronic communications (including emails) between two or more individuals.

ee. "Communication" means any discussion or any written or electronic correspondence or recorded voice message of any kind.

ff. "Employee" means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

gg. "Representative" means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.

hh. "Entity" means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

ii. "Person" means any natural person or legal entity, including but not limited to any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.

### **Instructions**

a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.

b. Unless otherwise specified, supply all annual data requested on a calendar-year basis; if any basis other than a calendar-year basis is used, such as to accommodate a fiscal-year basis, state as part of the response the nature and type of the basis so used.

c. In the event you are unable to respond to any Interrogatory, please explain why you are unable to respond.

d. Unless otherwise specified, supply all information requested for the period January 1, 1987 through the present.

### **INTERROGATORIES**

1. Describe all discussions that you had with Robert F. Turner about building out the KNGS facilities, the KAAX facilities, the KZPE facilities and/or the KYAF facilities.

2. Describe all efforts that were taken to construct the facilities at KNGS.

3. Describe all efforts that were taken to construct the facilities at KAAX.

4. Describe all efforts that were taken to construct the facilities at KYAF.

5. Describe all efforts that were taken to construct the facilities at KZPE.

6. Describe all efforts that were taken to construct the facilities at KZPO.

7. Explain whether you filed an FCC Form 854 with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KNGS, and if not, explain why not.

8. Explain whether you filed an FCC Form 854 with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KAAX, and if not, explain why not.

9. Explain whether you filed an FCC Form 854 with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the

permit for KYAF, and if not, explain why not.

10. Explain whether you filed an FCC Form 854 with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KZPE, and if not, explain why not.

11. Explain whether you filed an FCC Form 854 with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KZPO, and if not, explain why not.

12. Explain the basis for your statement to an agent from the Commission's Los Angeles Field Office that Home Base dismantled the tower for the KYAF antenna, including but not limited to the reason or reasons such tower was dismantled and the date on which it was dismantled.

13. Explain whether the tower for the KYAF antenna was ever reassembled, and if so the date on which that occurred.

14. Explain whether the tower for the KNGS antenna was dismantled, including but not limited to the reason or reasons such tower was dismantled and the date on which it was dismantled.

15. If the KNGS antenna was dismantled, explain whether it was ever reassembled, and if so the date on which that occurred.

16. Explain whether the tower for the KAAX antenna was dismantled, including but not limited to the reason or reasons such tower was dismantled and the date on which it was dismantled.

17. If the KAAX antenna was dismantled, explain whether it was ever reassembled, and if so the date on which that occurred.

18. Describe the facilities that currently exist at KNGS, including but not limited to, the antenna structure and whether there exists a staffed main studio.
19. If there was a point in time in which KNGS did not maintain a staffed main studio, identify the time period(s) and explain why no such staffed main studio was maintained.
20. Identify the height and location of the antenna structure for KNGS since obtaining the construction permit for that station, and at all times thereafter.
21. Describe the facilities that currently exist at KAAX, including but not limited to, the antenna structure and whether there exists a staffed main studio.
22. If there was a point in time in which KAAX did not maintain a staffed main studio, identify the time period(s) and explain why no such staffed main studio was maintained.
23. Identify the height and location of the antenna structure for KAAX since obtaining the construction permit for that station, and at all times thereafter.
24. Describe the facilities that currently exist at KYAF, including but not limited to, the antenna structure and whether there exists a staffed main studio.
25. If there was a point in time in which KYAF did not maintain a staffed main studio, identify the time period(s) and explain why no such staffed main studio was maintained.
26. Identify the height and location of the antenna structure for KYAF since obtaining the construction permit for that station, and at all times thereafter.
27. Describe the facilities that currently exist at KZPE, including but not limited to, the antenna structure and whether there exists a staffed main studio.
28. If there was a point in time in which KZPE did not maintain a staffed main studio, identify the time period(s) and explain why no such staffed main studio was maintained.
29. Identify the height and location of the antenna structure for KZPE since obtaining

the construction permit for that station, and at all times thereafter.

30. Describe the facilities that currently exist at KZPO, including but not limited to, the antenna structure and whether there exists a staffed main studio.

31. If there was a point in time in which KZPO did not maintain a staffed main studio, identify the time period(s) and explain why no such staffed main studio was maintained.

32. Identify the height and location of the antenna structure for KZPO since obtaining the construction permit and at all times thereafter.

33. Identify the local number in Coalinga, California or the toll-free number for KNKS that has been associated with this station since obtaining the construction permit.

34. Identify the local number in Avenal, California or the toll-free number for KAAX that has been associated with this station since obtaining the construction permit.

35. Identify the local number in Firebaugh, California or the toll-free number for KYAF that has been associated with this station since obtaining the construction permit.

36. Describe whether you were given permission or were provided with authorization to operate KNKS on land owned by the Bureau of Land Management of the U.S. Department of Interior, and if so, identify (a) the date on which you were given such permission or provided such authorization, (b) the type of permission or authorization (e.g., rental, right-of-way); (c) the person or persons from whom you obtained this permission or authorization and their contact information; (d) the term of this permission or authorization.

37. Explain the basis for your statement in your November 25, 2000 response to the Informal Objection filed by Richard M. Smith to your license application for KNKS on November 17, 1999 that "KNKS was constructed in compliance with its construction permit," including but not limited to an identification of all documents you have produced, or have in

your possession, custody or control, in support of this statement.

38. Explain the basis for your statement in your November 25, 2000 response to the Informal Objection filed by Richard M. Smith to your license application for KNGS on November 17, 1999 that “[t]he KNGS tower was destroyed by vandalism after the license applications was filed for KNGS” including but not limited to an identification of all documents you have produced, or have in your possession, custody or control, in support of this statement.

39. Identify the date on which construction of the facilities at KNGS in accordance with the construction permit was completed.

40. Identify the date on which construction of the facilities at KAAX in accordance with the construction permit was completed.

41. Identify the date on which construction of the facilities at KYAF in accordance with the construction permit was completed.

42. Identify the date on which construction of the facilities at KZPE in accordance with the construction permit was completed.

43. Identify the date on which construction of the facilities at KZPO in accordance with the construction permit was completed.

44. Explain whether KNGS was constructed in compliance with its construction permit, and if not, explain why it was not.

45. Explain whether KAAX was constructed in compliance with its construction permit, and if not, explain why it was not.

46. Explain whether KYAF was constructed in compliance with its construction permit, and if not, explain why it was not.

47. Explain whether KZPE was constructed in compliance with its construction

permit, and if not, explain why it was not.

48. Explain whether KZPO was constructed in compliance with its construction permit, and if not, explain why it was not.

49. Describe the vandalism that purportedly occurred in relation to the KNGS tower.

50. Describe the vandalism that purportedly occurred in relation to the KAAX tower.

51. Describe the involvement if any of Michael Kunec in constructing the KNGS facilities.

52. Describe the involvement if any of Michael Kunec in constructing the KAAX facilities.

53. Identify the EAS equipment that has been maintained at the KYAF site since Central Valley obtained the construction permit.

54. If EAS equipment has not been maintained at the KYAF site for any period of time since Central Valley obtained the construction permit, identify the time period(s) and explain the circumstances as to why EAS equipment was not maintained.

55. Identify the chief operator of KYAF.

56. Explain the connection of Mr. Ray Knight to KYAF.

57. Identify the contact information for Mr. Knight, including but not limited to his last known business and residence addresses; and last known business and residence telephone numbers.

58. Explain whether you were an owner, officer, or individual who controlled the operations of Avenal at the time a construction permit for KAAX was filed, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

59. Explain whether you were authorized to act for, or otherwise represent or act as

counsel for, Avenal as it relates to KAAX at the time a construction permit for KAAX was filed, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

60. Explain whether you were an owner, officer, or individual who controlled the operations of Avenal at the time a construction permit for KNGS was filed, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

61. Explain whether you were authorized to act for, or otherwise represent or act as counsel for, Avenal as it relates to KNGS at the time a construction permit for KNGS was filed, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

62. Explain whether you were an owner, officer, or individual who controlled the operations of Central Valley at the time Central Valley filed an application for a construction permit for KYAF, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

63. Explain whether you were authorized to act for, or otherwise represent or act as counsel for, Central Valley as it relates to KYAF at the time Central Valley filed an application for a construction permit for KYAF, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

64. Explain whether you were authorized to act for, or otherwise represent or act as counsel for, FCB as it relates to KZPE at the time FCB filed an application for a construction permit for KZPE, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

65. Explain whether you are authorized to act for, or otherwise represent or act as

counsel for, The Estate of H.L. Charles as it relates to KZPE, and if not, explain why not.

66. Explain whether you were authorized to act for, or otherwise represent, Lindsay Broadcasting as it relates to KZPO at the time Lindsay Broadcasting filed an application for a construction permit, during the time periods referenced in the HDO, and at all times thereafter, and if not, explain why not.

67. Explain whether you are authorized to act for, or otherwise represent or act as counsel for, The Estate of Lindsay Ware as it relates to KZPO, and if not, explain why not.

68. Identify all consultants, contractors, agents or other parties whom you hired to assist with, provide advice, administer, or complete construction of KNGS, including but not limited to their names, addresses, contact information, and the time period(s) and purposes for which they were hired.

69. Identify all consultants, contractors, agents or other parties whom you hired to assist with, provide advice, administer, or complete construction of KAAX, including but not limited to their names, addresses, contact information, and the time period(s) and purposes for which they were hired.

70. Identify all consultants, contractors, agents or other parties whom you hired to assist with, provide advice, administer, or complete construction of KYAF, including but not limited to their names, addresses, contact information, and the time period(s) and purposes for which they were hired.

71. Identify all consultants, contractors, agents or other parties whom you hired to assist with, provide advice, administer, or complete construction of KZPE, including but not limited to their names, addresses, contact information, and the time period(s) and purposes for which they were hired.

72. Identify all consultants, contractors, agents or other parties whom you hired to assist with, provide advice, administer, or complete construction of KZPO, including but not limited to their names, addresses, contact information, and the time period(s) and purposes for which they were hired.

73. Explain whether KNGS is currently operating, and if not, explain why it ceased operations and the date on which it ceased operations.

74. Explain whether KAAX is currently operating, and if not, explain why it ceased operations and the date on which it ceased operations.

75. Explain whether KYAF is currently operating, and if not, explain why it ceased operations and the date on which it ceased operations.

76. Explain whether KZPE is currently operating, and if not, explain why it ceased operations and the date on which it ceased operations.

77. Explain whether KZPO is currently operating, and if not, explain why it ceased operations and the date on which it ceased operations.

78. Identify the state in which Avenal was incorporated and the date on which it was incorporated.

79. Identify the state in which Central Valley was incorporated and the date on which it was incorporated.

80. Identify all of the locations where KNGS has maintained its Public Inspection Files and state the time period(s) during which the Public Inspection Files were maintained at each location.

81. Identify any time period(s) in which KNGS did not maintain its Public Inspection Files since obtaining its construction permit, and for each such time period, explain why KNGS

did not maintain its Public Inspection Files.

82. Identify all of the locations where KAAX has maintained its Public Inspection Files and state the time period(s) during which the Public Inspection Files were maintained at each location.

83. Identify any time period(s) in which KAAX did not maintain its Public Inspection Files since obtaining its construction permit, and for each such time period, explain why KAAX did not maintain its Public Inspection Files.

84. Identify all of the locations where KYAF has maintained its Public Inspection Files and state the time period(s) during which the Public Inspection Files were maintained at each location.

85. Identify any time period(s) in which KYAF did not maintain its Public Inspection Files since obtaining its construction permit, and for each such time period, explain why KYAF did not maintain its Public Inspection Files.

86. Identify all of the locations where KZPE has maintained its Public Inspection Files and state the time period(s) during which the Public Inspection Files were maintained at each location.

87. Identify any time period(s) in which KZPE did not maintain its Public Inspection Files since obtaining its construction permit, and for each such time period, explain why KZPE did not maintain its Public Inspection Files.

88. Identify all of the locations where KZPO has maintained its Public Inspection Files and state the time period(s) during which the Public Inspection Files were maintained at each location.

89. Identify any time period(s) in which KZPO did not maintain its Public Inspection

Files since obtaining its construction permit, and for each such time period, explain why KZPO did not maintain its Public Inspection Files.

90. Identify the location where KZPO has maintained its EAS logs.

91. Identify any time period(s) in which KZPO has not maintained its EAS logs since obtaining its construction permit, and for each such time period, explain why KZPO did not maintain EAS logs.

92. Explain why KZPO was operating at a transmitter output power greater than 105% of that authorized.

93. Identify the chief operator of KZPO.

94. Identify the EAS equipment at KZPO.

95. Identify any time period(s) in which KZPO has not maintained EAS equipment since obtaining its construction permit, and for each such time period, explain why KZPO did not maintain EAS equipment.

96. Identify all individuals who assisted in the preparation of your responses to the Enforcement Bureau's First Set Of Requests For Production Of Documents to William L. Zawila, and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers.

97. Identify all individuals who assisted in the preparation of your responses to the Enforcement Bureau's First Set Of Interrogatories To William L. Zawila, and state his or her full name; the particular response(s) that person assisted with; last known business and residence addresses; and last known business and residence telephone numbers.

98. Identify each and every person that you expect to rely on as a witness and/or for

whom you intend to submit written direct testimony for the hearing in this matter. For each and every person identified, state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.

Respectfully submitted,

Travis LeBlanc  
Chief, Enforcement Bureau



Pamela S. Kane  
Special Counsel  
Investigations and Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 4-C330  
Washington, D.C. 20554  
(202) 418-1420

Michael Engel  
Special Counsel  
Market Disputes Resolution Division  
Enforcement Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 4-C366  
Washington, D.C. 20554  
(202) 418-7330

July 28, 2015

CERTIFICATE OF SERVICE

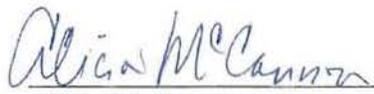
Alicia McCannon, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 28th day of July, 2015, sent by first class United States mail copies of the foregoing "ENFORCEMENT BUREAU'S FIRST SET OF INTERROGATORIES TO WILLIAM L. ZAWILA" to:

The Honorable Richard L. Sippel  
Chief Administrative Law Judge  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554 (by hand, courtesy copy)

Austin Randazzo  
Office of the Administrative Law Judge  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554 (by hand, courtesy copy)

William Zawila, Esq.  
12600 Brookhurst Street, Suite 105  
Garden Grove, CA 92804-4833  
(714) 636-5040 (telephone)  
(714) 636-5042 (facsimile)  
(by facsimile and first-class mail)

Michael Couzens  
Michael Couzens Law Office  
6536 Telegraph Avenue  
Suite B201  
Oakland, CA 94609  
(by first-class mail and email to [cuz@well.com](mailto:cuz@well.com))

  
\_\_\_\_\_  
Alicia McCannon

# Exhibit B

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	EB Docket No. 03-152
	)	
<b>WILLIAM L. ZAWILA</b>	)	Facility ID No. 72672
	)	
Permittee of FM Station KNKS, Coalinga, California	)	
	)	
<b>AVENAL EDUCATIONAL SERVICES, INC.</b>	)	Facility ID No. 3365
	)	
Permittee of FM Station KAAX, Avenal, California	)	
	)	
<b>CENTRAL VALLEY EDUCATIONAL SERVICES, INC.</b>	)	Facility ID No. 9993
	)	
Permittee of FM Station KYAF, Firebaugh, California	)	
	)	
<b>H. L. CHARLES D/B/A FORD CITY BROADCASTING</b>	)	Facility ID No. 22030
	)	
Permittee of FM Station KZPE, Ford City, California	)	
	)	
<b>LINDA WARE D/B/A LINDSAY BROADCASTING</b>	)	Facility ID No. 37725
	)	
Licensee of FM Station KZPO, Lindsay, California	)	

To: William L. Zawila

**ENFORCEMENT BUREAU'S FIRST SET OF REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO MR. ZAWILA**

Pursuant to Section 1.325 of the Commission's rules, 47 C.F.R. § 1.325, the Enforcement Bureau (Bureau) hereby requests that, Mr. Zawila produce the documents, as defined and specified herein, and deliver the documents to the offices of the Investigations and Hearings Division, Enforcement Bureau, Suite 4-C330, 445 12<sup>th</sup> Street, S.W., Washington, DC 20554 (or at some other location that is mutually acceptable to the Bureau and Mr. Zawila) within ten (10) days of the date of this Request.

### DEFINITIONS

For the purposes of this document, the following definition shall apply:

a. "William L. Zawila" "Mr. Zawila" "you" and "your" shall mean William L. Zawila, any affiliate, d/b/a, including all other persons acting or purporting to act on his behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing during the period January 1, 1987 through the present.

b. "Avenal" shall mean Avenal Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

c. "Central Valley" shall mean Central Valley Educational Services, Inc., any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors,

officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

d. "FCB" shall refer to The Estate of H.L. Charles d/b/a/ Ford City Broadcasting, H.L. Charles d/b/a/ Ford City Broadcasting, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

e. "Lindsay Broadcasting" shall refer to The Estate of Linda Ware d/b/a Lindsay Broadcasting, Linda Ware d/b/a Lindsay Broadcasting, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.

f. "HDO" shall refer to the Order to Show Cause, Notice of Opportunity for Hearing, and Hearing Designation Order, released by the Commission on July 16, 2003.

g. "EAS" shall mean Emergency Alert System.

h. "KNGS" means radio broadcast station KNGS (FM), Coalinga, California.

i. "KAAX" means radio broadcast station KAAX (FM), Avenal, California.

- j. “KYAF” means radio broadcast station formerly known under call sign KAJF (FM), Firebaugh, California.”
- k. “KZPE” means radio broadcast station KZPE (FM), Ford City, California.
- l. “KZPO” means radio broadcast station KZPO (FM), Lindsay, California.
- m. “Act” shall mean the Communications Act of 1934, as amended.
- n. “Commission” or “FCC” shall mean the Federal Communications Commission.
- o. “WTB” shall mean the Wireless Telecommunications Bureau of the Commission.
- p. “Audio Division” shall mean the Audio Division of the Commission’s Media Bureau.
- q. “FCC Form 854” shall mean the FCC Form 854 used to register structures used for wire or radio communication service in any area where radio services are regulated by the Commission; to make changes to existing registered structures or pending applications; or to notify the Commission of the completion of construction or dismantlement of structures, as required by Title 47 of the Code of Federal Regulations, Chapter 1, Part 17 (FCC Rules Part 17) which can be located at <https://transition.fcc.gov/Forms/Form854/854.pdf>.
- r. “Public Inspection Files” shall mean those files identified in Section 73.3526 of the Commission’s Rules.
- s. “Rules” means the Commission’s regulations found in Title 47 of the Code of Federal Regulations.
- t. The terms/phrases “referring to,” “relating to” and/or “concerning,” as used herein, shall be interpreted broadly and shall include, but not be limited to, the following meanings: constituting, comprising, evidencing, reflecting, respecting, discussing, referring to, stating, describing, recording, noting, considering, embodying, evaluating, analyzing, mentioning, containing, concerning, regarding, indicating, pertaining to, showing, bearing upon, studying,

memorializing, or commenting upon, or any other term synonymous with or similar to the foregoing.

u. “State” and “describe” mean to set forth a complete and detailed statement of all information, circumstances and facts that refer to, relate to, reflect, comprise or bear upon the matter concerning which information is requested.

v. The terms “identify” and “identification” when used in reference to an individual person mean to state his full name, residence and business telephone numbers, and present residence and business addresses if known, and his present or last known title, position and business affiliation.

w. The terms “identify” and “identification” when used in reference to a person other than a natural person mean to state the full and official name of the business entity, its principal place of business, and the main telephone number of such business entity.

x. The terms “identify” and “identification” when used in reference to a document mean to state its date, type (e.g., memo, telecopy, email), and its authors, addressees, title, if any, and, if no title, a brief description of the subject matter of the document and its present or last known location and custodian. If any document once was, but is no longer, in your possession, custody, or control, state what disposition was made of it and the reason for such disposition.

y. The terms “identify” and “identification” when used in reference to any act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication, mean to: (a) describe the nature and substance of the act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication; (b) state the date when and place where it occurred; and (c) identify each person who was a participant therein.

z. The term “and” also means “or” and the term “or” also means “and.”

aa. The term “each” also means “every” and the term “every” also means “each.”

bb. The term “all” also means “any” and the term “any” also means “all.”

cc. The term “identify” when used with reference to a person or persons, means to state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.

dd. The term “document” means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form) in the possession, custody, or control of Mr. Zawila.

ee. “Discussion” means any assembly, congregation, encounter, meeting or conversation between or among two or more individuals for any purpose, whether or not planned, arranged, or scheduled in advance. “Discussion” includes, without limitation, all oral communications,

whether or not in person, by telephone (including voicemails and similar recordings), or otherwise, and electronic communications (including emails) between two or more individuals.

ff. "Communication" means any discussion or any written or electronic correspondence or recorded voice message of any kind.

gg. "Employee" means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

hh. "Representative" means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.

ii. "Entity" means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

jj. "Person" means any natural person or legal entity, including but not limited to any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.

#### **Instructions**

a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.

b. Unless otherwise specified, supply all annual data requested on a calendar-year basis; if any basis other than a calendar-year basis is used, such as to accommodate a fiscal-year basis, state as part of the response the nature and type of the basis so used.

c. Unless otherwise specified, supply all information requested for the period January 1, 1987 through the present.

### Documents Requested

1. Documents constituting the complete application for a construction permit for KNGS, including but not limited to, any applications to modify this application.
2. Documents sufficient to show that the Commission granted you a construction permit for KNGS.
3. Documents constituting the complete application for a license to cover the construction permit for KNGS.
4. Documents constituting any FCC Forms 854 filed with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KNGS.
5. Documents constituting any FCC Forms 854 filed with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KAAX.
6. Documents constituting any FCC Forms 854 filed with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KYAF.
7. Documents constituting any FCC Forms 854 filed with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KZPE.
8. Documents constituting any FCC Forms 854 filed with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for KZPO.

9. All communications between you and Robert F. Turner regarding KNKS, KAAX, KYAF, and/or KZPE including but not limited to, any requests to secure engineering services, contracts, work orders, invoices, and purchase orders.

10. Documents sufficient to identify the location(s) of the antenna for KNKS since obtaining the construction permit.

11. Documents sufficient to identify the location(s) of the antenna for KAAX since obtaining the construction permit.

12. Documents sufficient to identify the location(s) of the antenna for KYAF since obtaining the construction permit.

13. Documents sufficient to identify the location(s) of the antenna for KZPE since obtaining the construction permit.

14. Documents sufficient to show that you have a right-of-way from the Bureau of Land Management of the U.S. Department of the Interior or any other entity or individual to operate a radio station at the KNKS site.

15. Documents sufficient to show that you have authorization from the Bureau of Land Management of the U.S. Department of the Interior or any other entity or individual to operate a radio station at the KNKS site.

16. Documents sufficient to show you obtained permission or authorization from the Bureau of Land Management of the U.S. Department of the Interior or any other entity or individual to use the land on which the KNKS station was located.

17. Documents sufficient to show that since obtaining the construction permit for KNKS, you have at all times thereafter maintained a local telephone number in Coalinga, California or a toll-free telephone number for KNKS.

18. Documents sufficient to show that since obtaining the construction permit, KAAX has at all times maintained a local telephone number in Avenal or a toll-free telephone number.

19. Documents sufficient to show that since obtaining the construction permit, KYAF has at all times maintained a local telephone number in Firebaugh, California or a toll-free telephone number.

20. Documents sufficient to identify the state in which Avenal was incorporated and the date on which it was incorporated, including, but not limited to, articles of incorporation and a certificate of incorporation.

21. Documents sufficient to identify the state in which Central Valley was incorporated and the date on which it was incorporated including, but not limited to, articles of incorporation and a certificate of incorporation.

22. Documents constituting your November 25, 2000 response to the Informal Objection filed by Richard Smith.

23. Documents sufficient to support your statement in a November 25, 2000 response to the Informal Objection filed by Richard Smith that "KNGS was constructed in compliance with its construction permit."

24. Documents sufficient to support your statement in a November 25, 2000 response to the Informal Objection filed by Richard Smith that "[t]he KNGS tower was destroyed by vandalism after the license application was filed for KNGS."

25. Documents constituting any notice or report provided to the Commission concerning the purported vandalism of the KNGS tower.

26. Documents constituting any notice or report provided to the Commission concerning the purported vandalism of the KAAX tower.

27. All documents referring or relating to the construction of the KNGS tower, including, but not limited to, requests to secure engineering services, work orders, contracts, invoices, and purchase orders.

28. All documents referring or relating to the construction of the KAAX tower, including, but not limited to, requests to secure engineering services, work orders, contracts, invoices, and purchase orders.

29. All documents referring or relating to the construction of the KYAF tower, including, but not limited to, requests to secure engineering services, work orders, contracts, invoices, and purchase orders.

30. All documents referring or relating to the construction of the KZPE tower, including, but not limited to, requests to secure engineering services, work orders, contracts, invoices, and purchase orders.

31. Documents sufficient to show that you maintained a staffed main studio for KNGS since obtaining a construction permit for KNGS, and at all times thereafter.

32. Documents sufficient to show that KAAX maintained a staffed main studio, since obtaining a construction permit, and at all times thereafter.

33. Documents sufficient to show that KYAF maintained a staffed main studio, since obtaining a construction permit, and at all times thereafter.

34. Documents sufficient to show that KZPE maintained a staffed main studio, since obtaining a construction permit, and at all times thereafter.

35. Documents sufficient to show that KZPO maintained a staffed main studio, since obtaining a construction permit, and at all times thereafter.

36. Documents constituting the station logs for KZPO.

37. Documents constituting the Public Inspection Files for KNGS.
38. Documents constituting the Public Inspection Files for KAAX.
39. Documents constituting the Public Inspection Files for KYAF.
40. Documents constituting the Public Inspection Files for KZPE.
41. All documents constituting any response(s) to a January 25, 2002 letter from the Audio Division concerning KNGS.
42. All documents constituting any response(s) to a January 25, 2002 letter from the Audio Division concerning KAAX.
43. All documents constituting any response(s) to a January 25, 2002 letter from the Audio Division concerning KYAF.
44. All documents constituting any response(s) to a January 25, 2002 letter from the Audio Division concerning KZPE.
45. All documents constituting any response(s) to a January 25, 2002 letter from the Audio Division concerning KZPO.
46. All communications between you and Kunec Engineering and/or Michael G. Kunec regarding KNGS, KAAX, KYAF, and/or KZPE including, but not limited to, any requests to secure engineering services, contracts, work orders, invoices, and purchase orders.
47. Documents sufficient to show that Kunec Engineering and/or Michael G. Kunec constructed the KNGS, KAAX, KYAF, and/or KZPE towers.
48. Documents constituting the complete application for a construction permit for KAAX, including, but not limited to, any applications to modify this application.
49. Documents sufficient to show that the Commission granted Avenal a construction permit for KAAX.

50. Documents constituting the complete application for a license to cover the construction permit for KAAX.

51. Documents sufficient to show that the facilities at KAAX were built as specified in the construction permit.

52. Documents sufficient to show that the facilities at KYAF were built as specified in the construction permit.

53. Documents sufficient to show that the facilities at KZPE were built as specified in the construction permit.

54. Documents sufficient to show that the KAAX tower was destroyed by vandalism.

55. Documents sufficient to show that the KNGS tower was destroyed by vandalism.

56. Documents constituting the complete application for a construction permit for KYAF, including, but not limited to, any applications to modify this application.

57. Documents sufficient to show that the Commission granted Central Valley a construction permit for KYAF.

58. Documents constituting the complete application for a license to cover the construction permit for KYAF.

59. All communications between you and HomeBase in Stanton, California regarding the construction of KYAF, including, but not limited to, any requests to secure engineering services, contracts, work orders, invoices, and purchase orders.

60. Documents sufficient to show that HomeBase dismantled the tower for KYAF.

61. Documents constituting the complete application for a construction permit for KZPE, including, but not limited to, any applications to modify this application.

62. Documents sufficient to show that the Commission granted FCB a construction permit for KZPE.

63. Documents constituting the complete application for a license to cover the construction permit for KZPE.

64. Documents constituting the complete application for a construction permit for KZPO, including, but not limited to, any applications to modify this application.

65. Documents sufficient to show that station KZPO is licensed to Lindsay Broadcasting.

66. All documents constituting the response(s) to a May 4, 2001 Official Notice of Violation directed to Lindsay Broadcasting concerning KZPO.

67. All documents constituting the response(s) to a June 21, 2001 Continuation of Official Notice of Violation directed to Lindsay Broadcasting concerning KZPO.

68. Documents sufficient to show that KZPO maintained EAS equipment at the site, including, but not limited to invoices or purchase orders for such equipment since obtaining its construction permit and at all times thereafter.

69. Documents constituting KZPO's EAS logs or reports.

70. Documents constituting KZPO's station logs.

71. Documents sufficient to show that you were an owner, officer, or individual who controlled the operations of Avenal at the time an application for a construction permit was filed for KNGS, during the time periods referenced in the HDO, and at all times thereafter.

72. Documents sufficient to show that you were an owner, officer, or individual who controlled the operations of Avenal at the time an application for a construction permit was filed for KAAX, during the time periods referenced in the HDO, and at all times thereafter.

73. Documents sufficient to show that you were an owner, officer, or individual who controlled the operations of Central Valley at the time an application for a construction permit was filed for KYAF, during the time periods referenced in the HDO, and at all times thereafter.

74. Documents sufficient to show that you were authorized to serve as counsel for, or otherwise represent, Avenal at the time an application for a construction permit was filed for KNGS, during the time periods referenced in the HDO, and at all times thereafter.

75. Documents sufficient to show that you were authorized to serve as counsel for, or otherwise represent, Avenal at the time an application for a construction permit was filed for KAAX, during the time periods referenced in the HDO, and at all times thereafter.

76. Documents sufficient to show that you were authorized to serve as counsel for, or otherwise represent, Central Valley at the time an application for a construction permit was filed for KYAF, during the time periods referenced in the HDO, and at all times thereafter.

77. Documents sufficient to show that you were authorized to serve as counsel for, or otherwise represent, FCB concerning KZPE at the time an application for a construction permit was filed for KZPE, during the time periods referenced in the HDO and at all times thereafter.

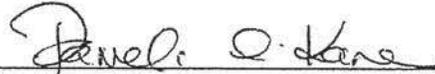
78. Documents sufficient to show that you were authorized to serve as counsel for, or otherwise represent, Lindsay Broadcasting concerning KZPO at the time an application for a construction permit was filed for KZPO during the time periods referenced in the HDO, and at all times thereafter.

79. Documents sufficient to show that you are authorized to act on behalf of The Estate of Linda Ware concerning KZPO.

80. Documents sufficient to show that you are authorized to act on behalf of The Estate of H.L. Charles concerning KZPE.

Respectfully submitted,

Travis LeBlanc  
Chief, Enforcement Bureau



---

Pamela S. Kane  
Special Counsel  
Investigations and Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 4-C330  
Washington, D.C. 20554  
(202) 418-1420

Michael Engel  
Special Counsel  
Market Disputes Resolution Division  
Enforcement Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 4-C366  
Washington, D.C. 20554  
(202) 418-7330

July 29, 2015

## CERTIFICATE OF SERVICE

Alicia McCannon, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 29th day of July, 2015, sent copies of the foregoing "ENFORCEMENT BUREAU'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO WILLIAM L. ZAWILA" to:

The Honorable Richard L. Sippel  
Chief Administrative Law Judge  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554 (by hand, courtesy copy)

Austin Randazzo  
Office of Administrative Law Judge  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554 (by hand, courtesy copy)

William Zawila, Esq.  
12600 Brookhurst Street, Suite 105  
Garden Grove, CA 92804-4833  
(714) 636-5040 (telephone)  
& (714) 636-5042 (facsimile)  
(by facsimile and first-class mail)

Michael Couzens  
Michael Couzens Law Office  
6536 Telegraph Avenue  
Suite B201  
Oakland, CA 94609  
(by first-class mail and email to [cuz@well.com](mailto:cuz@well.com))

  
Alicia McCannon

# Exhibit C

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of	)	EB Docket No. 03-152
	)	
<b>WILLIAM L. ZAWILA</b>	)	Facility ID No. 72672
	)	
Permittee of FM Station KNKS	)	
Coalinga, California	)	
	)	
<b>AVENAL EDUCATIONAL SERVICE, INC.</b>	)	Facility ID No. 3365
	)	
Permittee of FM Station KAAX,	)	
Avenal, California	)	
	)	
<b>CENTRAL VALLEY EDUCATIONAL</b>	)	Facility ID No. 9993
<b>SERVICES, INC.</b>	)	
	)	
Permittee of FM Station KYAP,	)	
Firebaugh, California	)	
	)	
<b>H. L. CHARLES d/b/a FORD CITY</b>	)	Facility ID No. 22030
<b>BROADCASTING</b>	)	
	)	
Permittee of FM Station KZPE,	)	
Ford City, California	)	
	)	
<b>LINDA WARE d/b/a LINDSAY</b>	)	Facility ID No. 37725
<b>BROADCASTING</b>	)	
	)	
Licensee of FM Station KZPO,	)	
Lindsay, California	)	

To: Marlene H. Dortch, Secretary  
Attn: Chief Administrative Law Judge  
Richard L. Sippel

RESPONSES TO ENFORCEMENT BUREAU'S FIRST SET OF  
INTERROGATORIES TO WILLIAM L. ZAWILA

William L. Zawila hereby responds to the Enforcement Bureau's  
first set of interrogatories as follows:

1. Objection.

This interrogatory is vague, ambiguous, and overbroad. It also seeks information which is irrelevant and not calculated to lead to the discovery of admissible evidence. It is also burdensome, oppressive, and causes unnecessary expense. It also seeks information which is protected by the attorney work product privilege.

2. Objection. This interrogatory is vague, ambiguous, and overbroad.

It also seeks information which is irrelevant and not calculated to lead to the discovery of admissible evidence. It is also burdensome, oppressive, and causes unnecessary expense. It also seeks information already in the FCC's files and records. FCC Rule §1.325 specifies how such information must be obtained.

3. Objection. Same as #1 above. It also seeks information already in the FCC's files and records. FCC Rule §1.325 specifies how such information must be obtained.

4. Objection. Same as #3 above.

5. Objection. Same as #3 above.

6. Objection. Same as #3 above.

7. Objection. This interrogatory seeks information already in the FCC's files and records. FCC Rule §1.325 specifies how such information must be obtained.

8. Objection. Same as #7 above.

9. Objection. Same as #7 above.

10. Objection. Same as #7 above.

11. Objection. Same as #7 above.

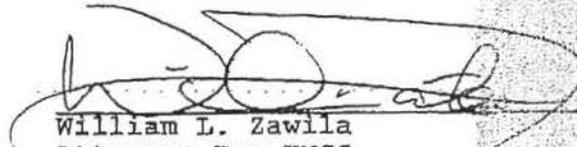
12. Objection. Same as #3 above.
13. Objection. Same as #2 above.
14. Objection. Same as #2 above.
15. Objection. Same as #2 above.
16. Objection. Same as #2 above.
17. Objection. Same as #2 above.
18. Objection. Same as #2 above.
19. Objection. Same as #2 above.
20. Objection. Same as #2 above.
21. Objection. Same as #2 above.
22. Objection. Same as #2 above.
23. Objection. Same as #2 above.
24. Objection. Same as #2 above.
25. Objection. Same as #2 above.
26. Objection. Same as #2 above.
27. Objection. Same as #2 above.
28. Objection. Same as #2 above.
29. Objection. Same as #2 above.
30. Objection. Same as #2 above.
31. Objection. Same as #2 above.
32. Objection. Same as #2 above.
33. Objection. Same as #2 above.
34. Objection. Same as #2 above.
35. Objection. Same as #2 above.
36. Objection. Same as #2 above.
37. Objection. Same as #2 above.
38. Objection. Same as #2 above.

39. Objection. Same as #2 above.
40. Objection. Same as #2 above.
41. Objection. Same as #2 above.
42. Objection. Same as #2 above.
43. Objection. Same as #2 above.
44. Objection. Same as #2 above.
45. Objection. Same as #2 above.
46. Objection. Same as #2 above.
47. Objection. Same as #2 above.
48. Objection. Same as #2 above.
49. Objection. Same as #2 above.
50. Objection. Same as #2 above.
51. Objection. Same as #2 above.
52. Objection. Same as #2 above.
53. Objection. Same as #2 above.
54. Objection. Same as #2 above.
55. Objection. Same as #2 above.
56. Objection. Same as #2 above.
57. Objection. Same as #2 above.
58. Objection. Same as #2 above. It also seeks information which  
is protected by the attorney-client privilege.
59. Objection. Same as #58 above.
60. Objection. Same as #58 above.
61. Objection. Same as #58 above.
62. Objection. Same as #58 above.
63. Objection. Same as #58 above.
64. Objection. Same as #58 above.

65. Objection. Same as #58 above.
66. Objection. Same as #58 above.
67. Objection. Same as #58 above.
68. Objection. Same as #2 above.
69. Objection. Same as #3 above.
70. Objection. Same as #3 above.
71. Objection. Same as #3 above.
72. Objection. Same as #3 above.
73. Objection. Same as #2 above.
74. Objection. Same as #2 above.
75. Objection. Same as #2 above.
76. Objection. Same as #2 above.
77. Objection. Same as #2 above.
78. Objection. Same as #2 above.
79. Objection. Same as #2 above.
80. Objection. This interrogatory is vague, ambiguous, and overbroad. It also seeks information which is irrelevant and not calculated to lead to the discovery of admissible evidence. It is also burdensome, oppressive, and causes unnecessary expense.
81. Objection. Same as #80 above.
82. Objection. Same as #80 above.
83. Objection. Same as #80 above.
84. Objection. Same as #80 above.
85. Objection. Same as #80 above.
86. Objection. Same as #80 above.
87. Objection. Same as #80 above.

- 88. Objection. Same as #80 above.
- 89. Objection. Same as #80 above.
- 90. Objection. Same as #80 above.
- 91. Objection. Same as #80 above.
- 92. Objection. Same as #80 above.
- 93. Objection. Same as #2 above.
- 94. Objection. Same as #80 above.
- 95. Objection. Same as #80 above.
- 96. Objections made by attorney William L. Zawila.
- 97. Objections made by attorney William L. Zawila.
- 98. Objection. Same as #1 above.

Respectfully submitted



William L. Zawila  
Attorney For KNGS  
12600 Brookhurst Street - #105  
Garden Grove, CA 92840  
(714) 636-5040-Telephone  
(714) 636-5042-FAX

8-14-15

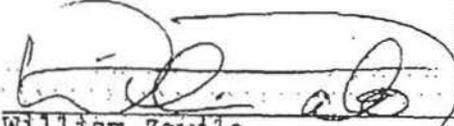
## CERTIFICATE OF SERVICE

I, William Zawila, hereby certify that a copy of the foregoing Response to Enforcement Bureau's 1st Set of Interrogatories to William L. Zawila was served on the following by U.S. First Class Mail, postage prepaid, on 8-14-15:

Chief Administrative Law Judge  
Richard L. Sippel  
FCC  
445 12th Street, S.W. - Room 1-C768  
Washington, D.C. 20554

Pamela S. Kane, Esquire  
Investigations and Hearings Division  
Enforcement Bureau  
FCC  
445 12th Street, S.W. - Room 4-C366  
Washington, D.C. 20554

Michael Couzens  
6536 Telegraph Avenue - Suite B201  
Oakland, CA 94609



William Zawila

# Exhibit D

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of	)	EB Docket No. 03-152
WILLIAM L. ZAWILA	)	Facility ID No. 72672
Permittee of FM Station KNGS	)	
Coalinga, California	)	
AVENAL EDUCATIONAL SERVICE, INC.	)	Facility ID No. 3365
Permittee of FM Station KAAX,	)	
Avenal, California	)	
CENTRAL VALLEY EDUCATIONAL	)	Facility ID No. 9993
SERVICES, INC.	)	
Permittee of FM Station KYAF,	)	
Firebaugh, California	)	
R. L. CHARLES d/b/a FORD CITY	)	Facility ID No. 22030
BROADCASTING	)	
Permittee of FM Station KZPE,	)	
Ford City, California	)	
LINDA WARE d/b/a LINDSAY	)	Facility ID No. 37725
BROADCASTING	)	
Licensee of FM Station KZPO,	)	
Lindsay, California	)	

To: Enforcement Bureau, FCC

RESPONSE TO ENFORCEMENT BUREAU'S FIRST SET OF  
REQUESTS FOR PRODUCTION OF DOCUMENTS TO MR. ZAWILA

William L. Zawila hereby responds to the Enforcement Bureau's  
first set of requests for production of documents as follows:

1. Objection. The documents requested are already in the FCC's files and records. FCC Rule §1.325 specifies how these documents must be obtained.
2. Objection. Same as #1 above.
3. Objection. Same as #1 above.
4. Objection. Same as #1 above.
5. Objection. Same as #1 above.
6. Objection. Same as #1 above.
7. Objection. Same as #1 above.
8. Objection. Same as #1 above.
9. Objection. Request is vague, ambiguous, and overbroad. Request seeks irrelevant information not calculated to lead to the discovery of admissible evidence. Request is burdensome, oppressive, and causes unnecessary expense. Additionally, the request seeks information protected by the attorney work product privilege.
10. Objection. Same as #1 above.
11. Objection. Same as #1 above.
12. Objection. Same as #1 above.
13. Objection. Same as #1 above.
14. Objection. Same as #1 above.
15. Objection. Same as #1 above.
16. Objection. Same as #1 above.
17. Objection. Request is vague, ambiguous, and overbroad. Request seeks irrelevant information not calculated to lead to the discovery of admissible evidence. Request is burdensome, oppressive, and causes unnecessary expense.

18. Objection. Same as #17 above.
19. Objection. Same as #17 above.
20. Objection. Same as #17 and #1 above.
21. Objection. Same as #17 and #1 above.
22. Objection. Same as #1 above.
23. Objection. Same as #1 above. Additionally, request is vague, ambiguous, and overbroad. Request is burdensome, oppressive, and causes unnecessary expense.
24. Objection. Same as #23 above.
25. Objection. Same as #23 above.
26. Objection. Same as #23 above.
27. Objection. Same as #23 above.
28. Objection. Same as #23 above.
29. Objection. Same as #23 above.
30. Objection. Same as #17 and #1 above.
31. Objection. Same as #17 above.
32. Objection. Same as #17 above.
33. Objection. Same as #17 above.
34. Objection. Same as #17 above.
35. Objection. Same as #17 above.
36. Objection. Same as #17 above.
37. Objection. Same as #17 and #1 above.
38. Objection. Same as #17 and #1 above.
39. Objection. Same as #17 and #1 above.
40. Objection. Same as #17 and #1 above.
41. Objection. Same as #1 above.

42. Objection. Same as #1 above.
43. Objection. Same as #1 above.
44. Objection. Same as #1 above.
45. Objection. Same as #1 above.
46. Objection. Same as #9 above.
47. Objection. Same as #17 above.
48. Objection. Same as #1 above.
49. Objection. Same as #1 above.
50. Objection. Same as #1 above.
51. Objection. Same as #17 and #1 above.
52. Objection. Same as #51 above.
53. Objection. Same as #51 above.
54. Objection. Same as #17 and #1 above.
55. Objection. Same as #54 above.
56. Objection. Same as #1 above.
57. Objection. Same as #1 above.
58. Objection. Same as #1 above.
59. Objection. Same as #9 above.
60. Objection. Same as #17 and #1 above.
61. Objection. Same as #1 above.
62. Objection. Same as #1 above.
63. Objection. Same as #1 above.
64. Objection. Same as #1 above.
65. Objection. Same as #1 above.
66. Objection. Same as #1 above.
67. Objection. Same as #1 above.

- 68. Objection. Same as #17 above.
- 69. Objection. Same as #17 above.
- 70. Objection. Same as #17 above.
- 71. Objection. Same as #17 and #1 above.
- 72. Objection. Same as #71 above.
- 73. Objection. Same as #71 above.
- 74. Objection. Same as #17 above. Additionally, the request seeks information protected by the attorney-client privilege.
- 75. Objection. Same as #74 above.
- 76. Objection. Same as #74 above.
- 77. Objection. Same as #74 above.
- 78. Objection. Same as #74 above.
- 79. Objection. Same as #74 above.
- 80. Objection. Same as #74 above.

Respectfully submitted,



William L. Zawila  
 Attorney For KNKS  
 12600 Brookhurst Street #105  
 Garden Grove, CA 92840  
 (714) 636-5040-Telephone  
 (714) 636-5042-FAX

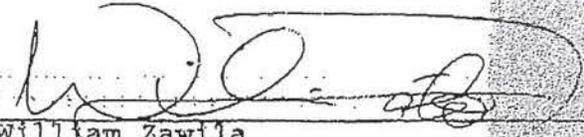
8-11-15

CERTIFICATE OF SERVICE

I, William Zawila, hereby certify that a copy of the foregoing Response to Enforcement Bureau's 1st Set of Requests for Production of Documents to Mr. Zawila was served on the following by U.S. First Class Mail, postage prepaid, on 8-11-15:

Pamela S. Kane, Esquire  
Investigations and Hearings Division  
Enforcement Bureau  
FCC  
445 12th Street, S.W. - Room 4-C366  
Washington, D.C. 20554

Michael Couzens  
6536 Telegraph Avenue - Suite B201  
Oakland, CA 94609

  
\_\_\_\_\_  
William Zawila

