

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

In the Matter of

| | | |
|--------------------------------------|---|-----------------------|
| The Walt Disney Company, |) | |
| |) | |
| American Broadcasting Company, |) | MB Docket No. 26-131 |
| |) | |
| KFSN Television, LLC, |) | Facility ID No. 8620 |
| Licensee of KFSN-TV, |) | File No. 0000298350 |
| Fresno, California |) | |
| |) | |
| KABC Television, LLC, |) | Facility ID No. 282 |
| Licensee of KABC-TV, |) | File No. 0000298356 |
| Los Angeles, California |) | |
| |) | |
| KGO Television, Inc., |) | Facility ID No. 34470 |
| Licensee of KGO-TV, |) | File No. 0000298344 |
| San Francisco, California |) | |
| |) | |
| WLS Television, Inc., |) | Facility ID No. 73226 |
| Licensee of WLS-TV, |) | File No. 0000298337 |
| Chicago, Illinois |) | |
| |) | |
| WABC Television (New York), LLC, |) | Facility ID No. 1328 |
| Licensee of WABC-TV, |) | File No. 0000298318 |
| New York, New York |) | |
| |) | |
| WTVD Television, LLC, |) | Facility ID No. 8617 |
| Licensee of WTVD, |) | File No.0000298327 |
| Durham, North Carolina |) | |
| |) | |
| WPVI Television (Philadelphia), LLC, |) | Facility ID No. 8616 |
| Licensee of WPVI-TV, |) | File No. 0000298324 |
| Philadelphia, Pennsylvania |) | |
| |) | |
| KTRK Television, Inc., |) | Facility ID No. 35675 |
| Licensee of KTRK-TV |) | File No. 0000298353 |
| Houston, Texas |) | |

To: Marlene H. Dortch, Secretary
Attn., David J. Brown, Chief, Video Division

PETITION TO DENY

Frequency Forward, The Media and Media Action Center (“MAC”), petitioners Elise Nakhnikian, Ginger Feldman, Jen Senko, Marcia Annenberg, Rosy Harari, Kristen Brochmann, Jill Noelle Pellowski, Anne Cooper, William Clinton McSherry II, Merry Jones, Kimberley Leahy, James Keenan, Mitchell Szczepanczyk, Sabrina Haake, Torry Mercer, Jeff Shaw, and Lanny Larson (“Petitioners”), file this Petition to Deny (“Petition”), the above referenced license renewal applications of The Walt Disney Company/American Broadcasting Company (“Disney” or “ABC”). Petitioners join with Disney in resisting the FCC’s unconstitutional attempt to chill Disney’s exercise of free speech and the public’s right to information free of government interference. In the event Disney capitulates to the FCC’s censorship regime, Petitioners seek denial of the ABC renewal applications.

Introduction

“My name is Ozymandias, king of kings:
Look on my works, ye mighty, and despair!”¹

Men who erect golden statues to themselves do not tolerate criticism of their self-proclaimed greatness. In his second term, President Donald Trump has intensified attacks on First Amendment rights, targeting journalists, lawyers, protestors, and media organizations that are critical of his policies. Through the power of his office and vexatious litigation, Trump has gone after his critics to intimidate and silence them. For example, the Trump administration has

¹ Percy Bysshe Shelley, "Ozymandias" from *The Poetical Works: In Four Volumes*. (London: Reeves & Turner, 1876.).

targeted law firms and lawyers that had previously represented positions adverse to Trump.

Several law firms have ignominiously capitulated to avoid lawsuits and government sanctions.²

The Trump administration's attacks on journalists and the media are unprecedented in the history of the American Republic. Yet, the right to criticize the government without fear of retribution is exactly the point of the First Amendment. Currently, Trump is pressing six lawsuits against news organizations and publishers, including *The Wall Street Journal*, *The New York Times*, the British Broadcasting Corporation, the *Des Moines Register* and CNN. He is also suing the Pulitzer Prize board over journalism prizes it awarded eight years ago. Just this week Trump has threatened to sue ABC over their "FAKE NEWS" coverage of the damage to the reflecting pool specifically their failure to report that Presidents Obama and Biden has spent over a 100 million dollars repairing the reflecting pool.³ Trump's goal is not necessarily to win, legal experts agree these suits have little merit, but rather to use the power of the government to intimidate and silence opposition. Litigation is expensive, and Trump himself has acknowledged that saddling his perceived enemies with onerous depositions is part of the point. Knowing the president is willing to rush to court serves to intimidates news outlets into easing up their reporting on Trump and his administration's policies. Placing the full weight of federal regulatory pressure on news

² *Trump's Executive Orders Against Law Firms*, Free Speech Center, <https://firstamendment.mtsu.edu/article/trumps-executive-orders-against-law-firms/>

³ On June 22, 2026, Trump wrote on Truth Social: "In describing the Vandalism that took place at the Reflecting Pool in Washington, D.C., ABC FAKE NEWS, one of the worst in the business, even paying me \$16,000,000 for past bad and inaccurate reporting, failed to report that their close "friends," Dumocrats Obama and Biden, spent over 100 Million Dollars on the Reflecting Pool, and it never worked. In fact, it was rarely open due to leaks and "stench." They wanted to spend 300 to 400 Million Dollars, but just let it ROT. I spent approximately 16 Million Dollars, and it came out great, except for the Vandalism, which we are now fixing. It was also a much bigger job than originally envisioned, including the outer areas and sidewalks. We are preparing lawsuits against ABC for false reporting. I like their money, which will be given to the U.S. Treasury! Thank you for your attention to this matter. President DJT"

organizations serves to further intimidate them. This was certainly the case with CBS's parent company Paramount, which agreed to pay \$16 million to settle a lawsuit by Trump over the editing of CBS' "60 Minutes" interview with then-Vice President Kamala Harris. The explanation for the settlement is simple. Paramount had an \$8.4 billion merger pending before the FCC, and Trump-appointed FCC Chairman Brendan Carr put that approval in jeopardy when he reopened a dubious news distortion investigation concerning a Kamala Harris interview. CBS had little choice but to bend the knee and kiss the golden ring.

Trump's Corleone-style approach toward media relations is not restricted to CBS, nor is Paramount's capitulation unique. ABC paid \$16 million to Trump to settle a defamation claim based on statements made by ABC anchor George Stephanopoulos concerning the civil judgment that Trump sexually abused E. Jean Carroll. As with Paramount, ABC chose to settle that case instead of availing itself of several First Amendment defenses. Similarly, both Meta and X paid millions of dollars to settle legally questionable lawsuits Trump filed against Facebook and X.

Trump has Weaponized the FCC to Pressure Media Companies to Favorably Report on Trump and His Administration

In violation of the First Amendment and the founding principles of our democracy, Trump is using the FCC to silence his critics. Trump appointed Republican commissioner, and a Project 2025 author, Brendan Carr as head of the FCC. Carr is the tip of the spear in the Trump administration's assault on freedom of speech. Since Carr became chairman, the FCC has opened baseless investigations into several media outlets that the president does not like, including ABC, NBC, CBS, and local news outlets. Carr has also opened investigations into NPR and PBS, alleging that they are breaking sponsorship rules. Even if these investigations are ultimately closed without action, the mere fact of opening them – and the implicit threat to the news

stations' licenses to operate – can have the effect of deterring the press from news coverage that the Trump administration dislikes.

In his most recent attack on the constitutional rights of Americans, Trump through his FCC Chairman, Brendan Carr,⁴ has initiated a coordinated attack on Disney/ABC and by extension on the rights of all Americans to access news and information free of government interference. The facts are succinctly laid out in Commissioner Anna M. Gomez's letter of May 11, 2026.⁵ The administration has demanded the firing of late-night host Jimmy Kimmel for comedy sketches made at the expense of the president. As Commissioner Gomez states in a recent letter to Disney CEO, Josh D'Amaro,

Last year, this Administration tasked the FCC to escalate its campaign against ABC by targeting Jimmy Kimmel. The goal was clear: use regulatory pressure to force his removal from the air and send a message to every other broadcaster about the cost of critical coverage.

Furthermore, the FCC has been scrutinizing ABC for its editorial decisions, particularly regarding the show "The View." Carr has questioned whether "The View" is a bona fide news program. The FCC has attacked Disney/ABC on two fronts. First, it ordered ABC to file a petition for declaratory ruling to affirm that "The View" is a bona fide news interview program.⁶ Second, it ordered ABC to file early license renewal applications on the trumped-up charge that

⁴ Carr has made it clear that he does not consider the FCC to be an independent agency. See, e.g. <https://www.nbcnews.com/business/media/senate-testimony-fcc-chairman-says-agency-isnt-independent-rcna249724>

⁵ Letter from Commissioner Anna M. Gomez to Josh D'Amaro, Chief Executive Officer of The Walt Disney Company (May 11, 2026).

⁶ Letter from Erin Boone, Chief, Media Bureau, FCC, to KTRK Television, Inc. (Mar. 26, 2026).

the FCC needs to investigate Disney’s potential violations of the equal employment opportunity (EEO) rule.⁷

Argument

Disney in its May 11, 2026, Petition for Declaratory Ruling took a principled stand in support of its First Amendment rights. As Disney stated in that Petition,

The First Amendment thus protects “editorial discretion in the selection and presentation” of speech.⁸ Under the First Amendment, the government is not in the business of compelling or suppressing speech to achieve officials’ ideal or preferred news presentations.

Governments are free to criticize private speech, but not to compel or suppress it. When the government has sought to shape the news landscape, the Supreme Court has roundly rejected those efforts. In *Miami Herald Pub. Co. v. Tornillo*, for instance, the Court invalidated a Florida law requiring newspapers to offer political candidates space to respond to negative press.⁹ The Court stressed that the “choice of material to go into a newspaper, and the decisions made as to... treatment of public issues and public officials—whether fair or unfair—constitute the exercise of editorial control and judgment,” which is itself protected speech.¹⁰ Whatever interest the state may have had in “ensur[ing] that a wide variety of views reach[ed] the public” is not sufficiently compelling to force a newspaper to “print that which it would not otherwise print.”¹¹

As the Disney Petition makes clear, the government may not tell private parties, “how to exercise their editorial discretion about what content to carry or favor.”¹²

⁷ See, *In re: The Walt Disney Company*, Order, DA 26-416, released April 28, 2026.

⁸ *Ark. Educ. Television Comm’n v. Forbes*, 523 U.S. 666, 674 (1998).

⁹ *Miami Herald Pub. Co. v. Tornillo*, 418 U.S. 241, 256 (1974).

¹⁰ *Id.* at 258.

¹¹ *Id.* at 248.

¹² *U.S. Telecom Ass’n v. FCC*, 855 F.3d 381, 435 (D.C. Cir. 2017) (Kavanaugh, J., dissenting from denial of rehearing en banc).

On May 28, 2026, Disney filed renewal applications for its owned and operated broadcast stations. It made it clear that it was doing so under protest.¹³ As Disney states, the FCC’s action represents an unprecedented attempt to suppress speech under the guise of bureaucratic process. “Its true purpose and inescapable effect are to suppress speech... and cause [ABC] and others to think twice before they say something the government might dislike.”¹⁴ Disney points out that the record of public statements by senior government officials targeting ABC and its parent company for their coverage and programming choices is extensive and explicit. The FCC Chairman himself has threatened broadcasters that “[w]e can do this the easy way or the hard way,” and he has warned that stations could lose their licenses if they do not “correct course.”¹⁵ Clearly, the purpose of the early license renewals is not to gather information concerning some alleged EEO shortcoming, but rather to punish and intimidate ABC and its parent company. As Disney points out, the early renewal order threatens free speech in three ways. First, it imposes costs on Disney in terms of time and resources. Disney is in the unenviable position of defending its right to continue broadcasting. Second, it threatens the integrity of the news and seeks to replace ABC’s journalistic judgment with that of an administration friendly point of view. Third, and most significantly, it chills protected speech across the entire broadcast industry. A fourth point must be added; the FCC’s actions undermine the public’s Constitutional right to receive news and information without government interference.

¹³ See, the exhibit in each renewal application, “Objection to Unlawful Early Renewal”. (“Disney Objection”).

¹⁴ *Id.*

¹⁵ *Id.*

Petitioners applaud Disney for its brave and principled stand. Hopefully, Disney will be able to withstand the pressure of the Trump administration's effort to control the reporting of news and other critical content on the ABC Network. However, Disney has capitulated to the Trump administration once and it may do so again. This Petition is filed to encourage Disney to resist Carr's intimidation and fight for its constitutional rights.

The airwaves belong to the people, not to the government or large corporations like Disney. A closed-door agreement negotiated between the FCC and Disney, a large publicly traded corporation concerned with preserving its shareholders' profits, likely will not serve the public interest. Any negotiations or agreement between the FCC and Disney must be done in the full light of day with the public fully aware of and participating in the negotiation of any agreement. A compliant Disney, that acquiesces in using its television licenses to broadcast administration propaganda will not serve the public interest. As Commissioner Gomez in her letter states,

Ultimately, this effort to punish and intimidate your company will not succeed. The FCC's internal process will be lengthy, and should it produce an outcome unfavorable to your stations, Disney will have every right to challenge that outcome in federal court, a process that could take years.

Commissioner Gomez is certainly correct. However, Disney must muster the internal courage and discipline to fight an administration bent on undermining the rights of not only Disney, but of the American people to the free and unfettered expression of ideas. Should Disney bend the knee and kiss the golden ring, it will undermine not only its rights, but the rights of all Americans. As the Court of Appeals has stated, "For better or worse, a licensee confronted with

the choice between an economic disadvantage and pleasing the government through curtailment of a constitutional right will generally choose curtailment.”¹⁶

Petitioners support Disney in its struggle, but they cannot take the chance that, like CBS, Disney will again capitulate to the demands of the administration. The First Amendment, as powerful as it is, can only be a shield to those who are willing to use it as one. It is critical that the American people have a seat at the table. After all, these licenses do not belong to Disney or the FCC, they are the property of the American people and are administered solely for their benefit. If Disney fights, Petitioners will stand on the barricade of democracy and fight with Disney. If Disney chooses its economic interests and capitulates, then Petitioners will demand the denial of its license renewal applications. Either way Petitioners stand on their inalienable constitutional right to receive and disseminate news and information unfiltered by government intimidation or corporate economic expediency.

Standing

Frequency Forward is a public interest organization and consumer advocacy watchdog dedicated to promoting greater transparency and accountability at the FCC.¹⁷ MAC is a group of concerned individuals who are working to influence policy at the FCC to ensure that broadcasters serve the public interest rather than their own private interests.¹⁸ Attached hereto are the declaration of 1.) Elise Nakhnikian, Ginger Feldman, Jen Senko, Marcia Annenberg, Rosy Harari, and Kristen Brochmann, who live in the New York DMA and are regular viewers of

¹⁶ *Illinois Citizens Comm. for Broad. V. FCC*, 515 F.2d 397, 407 (DC Cir. 1975) (Bazelon, C.J. statement on denial of rehearing en banc)

¹⁷ <https://frequencyfwd.com>

¹⁸ <https://www.mediaactioncenter.net>

WABC, New York, New York, 2.) Jill Noelle Pellowski who live Brea, California and is a regular viewer of KABC-TV, Los Angeles, 3.) Anne Cooper and William Clinton McSherry II, who live in the Raleigh-Durham North Carolina DMA and are regular viewers of WTVD-TV, Durham, North Carolina, 4.) Merry Jones, Kimberley Leahy, and James Keenan, who live in the Philadelphia DMA and are regular viewers of WPVI-TV, Philadelphia, Pennsylvania, 5.) Mitchell Szczepanczyk and Sabrina Haake who are residents of Chicago, Illinois and regular viewers of WLS-TV, Chicago, Illinois, 6) Torry Mercer who is a resident of Houston, Texas and a regular viewer of KTRK-TV, Houston, Texas and 7.) Jeff Shaw, who is a resident of Berkeley, California and a regular viewer of KGO-TV, San Francisco, California and 8.) Lanny Larson, who is a resident of Clovis, California and a regular viewer of KFSN-TV, Fresno, California.

Petitioners have been gravely injured by the FCC's actions in this proceeding. Petitioners will be further injured if Disney buckles to the administration's demands. That the FCC has required Disney to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on its television stations. It further chills reporting from other broadcasters and news organization. To the extent the FCC's censorship gambit is already inhibiting Disney, Petitioners are injured by being denied the full and fair news reporting that is the bedrock of Petitioners constitutional right to receive information free of government intrusion.

Conclusion

The genius of the U.S. Constitution is that it guarantees the rights of the American people to hold divergent views and to express those views even when they go against the stated government policies. However, the current administration seeks to replace spirited debate with indoctrination. Any view that disagrees with the current administration's stated orthodoxy is

immediately labeled as “fake news.” The United States has no *lèse-majesté* laws. To be clear: in America, criticizing the President is not a crime. It is a constitutional right. But this administration has substituted allegations of EEO violations and news distortion for the crime of *lèse-majesté*. Disney, like a disobedient dog, must be brought to heel.

Petitioners demand that the FCC grant Disney’s renewal applications immediately, without any agreement or conditions, terminate all investigations and apologize to the American people for the grievous harm it has done to the First Amendment, the United States Constitution and American democracy. Each day the FCC delays chills Disney’s First Amendment rights, the First Amendment rights of other broadcasters and undermines the constitutional rights of viewers.

Should Disney agree to restrict its speech via negotiations with the FCC, Petitioners demand that its renewal applications be denied and its licenses revoked.

Respectfully Submitted,

/s/Arthur V. Belendiuk
Arthur V. Belendiuk
Smithwick & Belendiuk, P.C.
5028 Wisconsin Avenue, N.W. #301
Washington, D.C. 20016
abelendiuk@fccworld.com
(202) 363-4559

June 26, 2026

Declaration of Elise Nakhnikian

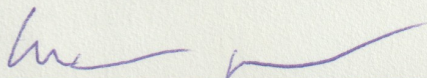
I, Elise Nakhnikian, declare under penalty of perjury, that the following information is true and correct:

I am a resident of New York, NY and a regular viewer of WABC-TV, New York, New York

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WABC-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WABC-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required WABC-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.



Elise Nakhnikian

Declaration of Ginger Feldman

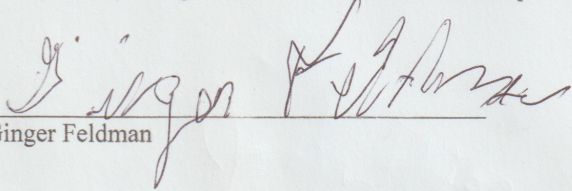
I, Ginger Feldman, declare under penalty of perjury, that the following information is true and correct:

I am a resident of New York, NY and a regular viewer of WABC-TV, New York, New York.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WABC-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WABC-TV.

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Ginger Feldman

Declaration of Jen Senko

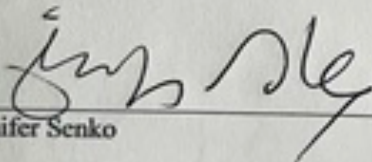
I, Jen Senko, declare under penalty of perjury, that the following information is true and correct:

I am a resident of New York, NY and a regular viewer of WABC-TV, New York, New York.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WABC-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WABC-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

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Jennifer Senko

Declaration of Marcia Annenberg

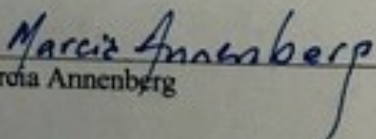
I, Marcia Annenberg, declare under penalty of perjury, that the following information is true and correct:

I am a resident of New York, NY and a regular viewer of WABC-TV, New York.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WABC-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WABC-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required WABC-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.



Marcia Annenberg

Declaration of Rosy Harari


I, Rosy Harari, declare under penalty of perjury, that the following information is true and correct:

I am a resident of New York, NY and a regular viewer of WABC-TV, New York, New York.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WABC-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WABC-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required WABC-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.



Rosy Harari

Declaration of Kristen Brochmann

I, Kristen Brochmann, declare under penalty of perjury, that the following information is true and correct:

I am a resident of New York, NY and a regular viewer of WABC-TV, New York, New York.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WABC-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WABC-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required WABC-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.



Kristen Brochmann

Declaration of Jill Noelle Pellowski

I, Jill Noelle Pellowski, declare under penalty of perjury, that the following information is true and correct:

I am a resident of Brea, California and a regular viewer of KABC-TV, Los Angeles, California. In particular, I rely on KABC-TV for important local news coverage including the recent primary elections for LA mayor and other offices. KABC-TV was also an important source for up-to-date information on the fires in 2025.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of KABC-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of KABC-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required KABC-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.


Jill Noelle Pellowski

Declaration of Anne Cooper

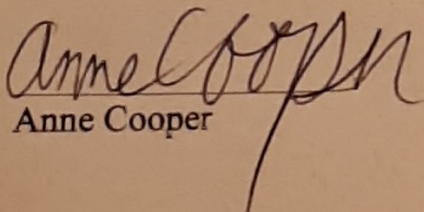
I, Anne Cooper, declare under penalty of perjury, that the following information is true and correct:

I am a resident of [Chapel Hill North Carolina] and a regular viewer of WTVD-TV, Raleigh, North Carolina.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WTVD-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WTVD-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required WTVD-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.


Anne Cooper

Declaration of William Clinton McSherry II

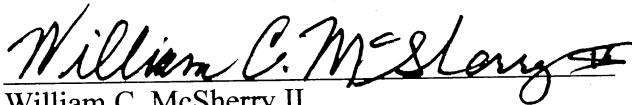
I, William Clinton McSherry II, declare under penalty of perjury, that the following information is true and correct:

I am a resident of Durham, North Carolina and a regular viewer of WTVD-TV, Raleigh, North Carolina.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WTVD-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WTVD-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Defensively submitting to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required WTVD-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To whatever extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.



William C. McSherry II
Durham, NC

Declaration of Merry Jones

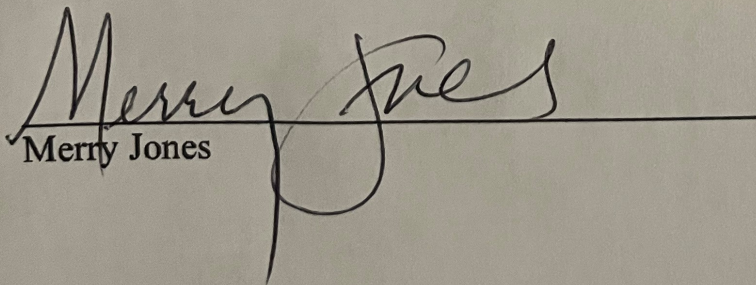
I, Merry Jones, declare under penalty of perjury, that the following information is true and correct:

I am a resident of Philadelphia, PA and a regular viewer of WPVI-TV, Philadelphia, Pennsylvania.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WPVI-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WPVI-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required WPVI-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.


Merry Jones

Declaration of Kimberley Leahy, Ph.D.

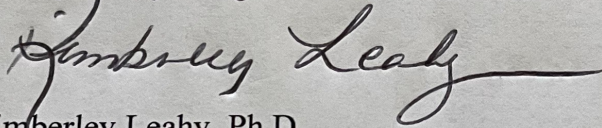
I, Kimberley Leahy, Ph.D., declare under penalty of perjury, that the following information is true and correct:

I am a resident of Philadelphia, PA and a regular viewer of WPVI-TV, Philadelphia, Pennsylvania.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WPVI-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WPVI-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required WPVI-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.



Kimberley Leahy, Ph.D.

June 20, 2026

Declaration of James Keenan

I, James Keenan, declare under penalty of perjury, that the following information is true and correct.

I am a resident of Lansdowne, Pennsylvania and a regular viewer of WPVI-TV, Philadelphia, Pennsylvania.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WPVI-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WPVI-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knocking under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required WPVI-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censoring gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.

James Keenan
James Keenan

Declaration of Sabrina Haake

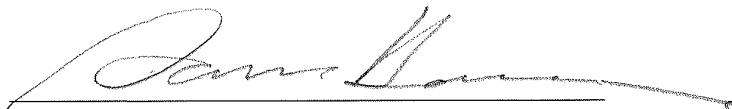
I, Sabrina Haake, declare under penalty of perjury, that the following information is true and correct:

I am a resident of Chicago, Illinois and a regular viewer of WLS-TV, Chicago, IL.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WLS-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WLS-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required WLS-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.



Sabrina Haake

Declaration of Mitchell Szczepanczyk

I, Mitchell Szczepanczyk, declare under penalty of perjury, that the following information is true and correct:

I am a resident of Chicago, Illinois and a regular viewer of WLS-TV, Chicago, Illinois. I watch WLS-TV for its coverage of the game show Jeopardy!, various sporting events, local news and events, and most critically its superlative live weather coverage -- particularly during times of severe weather when it provides nonstop commercial-free coverage of severe storms and tornadoes affecting viewers in and around Chicago.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of WLS-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of WLS-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required WLS-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.



Mitchell Szczepanczyk

Declaration of Torry Mercer

I, Torry Mercer, declare under penalty of perjury, that the following information is true and correct:

I am a resident of Houston TX and a regular viewer of KTRK-TV, Houston, Texas.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of KTRK-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of KTRK-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required KTRK-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.

Torry Mercer

Torry Mercer

Declaration of Jeff Shaw

I, Jeff Shaw, declare under penalty of perjury, that the following information is true and correct:

I am a resident of Berkeley, CA and a regular viewer of KGO-TV, San Francisco, CA.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of KGO-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of KGO-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required KGO-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.



June 23, 2026

Jeff Shaw
1202 Spruce Street
Berkeley, CA 94709

Declaration of Lanny Larson

I, Lanny Larson, declare under penalty of perjury, that the following information is true and correct:

I am a resident of Clovis, California and a regular viewer of KFSN-TV, Fresno, California.

I declare that I have personal knowledge of the factual allegations I make in the Petition to Deny the license renewal application of KFSN-TV and that these allegations are true and correct. These allegations are the direct cause of the injury I suffer as a regular viewer of KFSN-TV.

A licensee's duty is to serve the public interest. The television airwaves belong to the people, not the government or the current administration, and it is with a station's viewers that a licensee's duty to broadcast in the public interest lies. The federal government has no role in censoring what a licensee, in its discretion, chooses to broadcast. Knuckling under to an overweening political agenda categorically does not serve the public interest. A licensee who does so lacks the qualifications to be a licensee and any secret deal between the FCC and Disney calls into question Disney's qualifications to remain a licensee.

That the FCC has required KFSN-TV to file a premature renewal application is itself an act of intimidation calculated to chill Disney's reporting of news on the station. To the extent the FCC's censorship gambit is already inhibiting Disney and the station, I am injured by being denied the full and fair news reporting that I seek.


Lanny Larson