

IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT
IN AND FOR POLK COUNTY, FLORIDA

RECEIVED

FEB 15 2012

EDWARD OLIVARES, an individual,

Plaintiff,

v.

MARTIN SANTOS, an individual,

Defendant.

JUDGE MCCARTHY

CASE NUMBER 2009CA-005214

SECTION NUMBER 07

MOTION HEARD, CONSIDERED

AND GRANTED AS TO

THIS 16 Feb 12

[Signature]
JUDGE J. MICHAEL MCCARTHY

**VERIFIED EMERGENCY MOTION FOR PROCEEDINGS
SUPPLEMENTARY, INJUNCTIVE RELIEF, REQUEST FOR
APPOINTMENT OF RECEIVER AND MOTION FOR EXPEDITED HEARING**

The Plaintiff/Judgment Creditor, by and through undersigned counsel and pursuant to Florida Statutes §§ 56.061, 56.10, 56.29, and Florida Rules of Civil Procedure 1.610 and 1.620, hereby moves for an Order: directing the seizure of certain intangible personal property of the Judgment Debtor, Martin Santos (hereinafter "Santos"), enjoining the Judgment Debtor and Judgment Debtor's wholly-owned corporate entity from effectuating the transfer of certain assets, and appointing a Receiver to manage and appropriately liquidate assets, and in support thereof, states:

BACKGROUND

1. The Plaintiff/Judgment Creditor is the holder of a valid Final Judgment entered by this Court on August 8, 2011. The Final Judgment is in the amount of forty-eight thousand twenty dollars and eighty-five cents (\$48,020.85) which is to bear interest at the statutory rate of 6% per annum until satisfied.

2. Pursuant to the Final Judgment, the Judgment Creditor has initiated and maintained execution proceedings against the Judgment Debtor seeking the seizure of

INJUNCTIVE RELIEF &
APPOINTMENT OF RECEIVER ← [Signature]

certain assets of the Judgment Debtor in satisfaction of the Final Judgment held by the Judgment Creditor. A copy of the Writ of Execution is attached hereto as Exhibit A and is incorporated herein by reference.

3. The Polk County Sheriff's Office has attempted to execute on assets of the Judgment Debtor, particularly, any and all stock in that certain Florida profit corporation known as "GB ENTERPRISES COMMUNICATIONS CORPORATION." (hereinafter "GB"). The Florida Division of Corporations indicates that the Judgment Debtor is the sole officer of GB. The public records on file with the Florida Division of Corporations are attached hereto as Exhibit B and are incorporated herein by reference.

4. Further, public records on file with the Federal Communications Commission ("FCC") indicate that the Judgment Debtor is the sole owner of 100% of the stock in GB. Copies of public records on file with the Federal Communications Commission are attached hereto as Exhibit C, and are incorporated herein by reference.

5. Pursuant to the "Ownership Report for Commercial Broadcast Stations" attached as Exhibit C, GB is the owner of the radio station bearing call letters WHNR, airing on 1360 AM in the Polk County and surrounding areas. GB is continuing to operate the WHNR radio station under the license issued by the FCC, pursuant to FCC File No: BL-19801215A1, as renewed by BR-20110926ALU.

6. Despite attempts by the Judgment Creditor and the Polk County Sheriff's Office, the Judgment Debtor has thwarted the Judgment Creditor's efforts to have the

Polk County Sheriff's Office seize, *inter alia*, Judgment Debtor's stock in GB. The Polk County Sheriff's Office returned the execution unsatisfied.

7. The valid execution proceedings initiated by the Judgment Creditor and against the Judgment Debtor remain outstanding and unsatisfied.

BASIS FOR EMERGENCY RELIEF AND EXPEDITED HEARING

8. Santos' and GB's primary asset, the WHNR radio station and its FCC license are governed by the authority of the FCC. The radio station license – currently held in the name of GB – is a valuable asset which comprises the value of the corporate stock of GB. Of course, as a Judgment Creditor of Santos, the Judgment Creditor has the right to seize upon those assets of the Judgment Debtor in satisfaction of the Final Judgment pursuant to Florida law.

9. Without the Judgment Creditor's knowledge, the Judgment Debtor and GB have apparently attempted to transfer the license issued by the FCC to a different corporation – Florida Spanish Communications Corp. ("FSCC"). The Judgment Creditor, upon reviewing the public records maintained by the FCC, came upon an approval letter issued by the FCC to GB and FSCC stating that FSCC is otherwise qualified to accept transfer of the license proposed to be transferred by GB. A copy of the February 9, 2012 approval letter is attached hereto as Exhibit D and is incorporated herein by reference.

10. The Judgment Creditor, nor the undersigned, nor Judgment Creditor's FCC counsel, Anthony Lepore, Esquire, received any notice relative to the proposed

transfer of the FCC license. Specifically, a different creditor of the Judgment Creditor – La Poderosa, LLC (apparently acting through an individual named Carlos Guerrero) – raised an objection to the proposed transfer. See February 9, 2012 Letter issued by the FCC attached as Exhibit D. In denying that objection, the FCC stated that “[Poderosa and Guerrero] have not provided evidence of an injunction or stay issued by a local court against the proposed sale. In absence of such an order from a local court, the Commission has routinely acted favorably on license applications.” See Exhibit D, p. 2.

11. Therefore, under FCC regulations, there currently exists no current impediment to the finalization of the transfer of the FCC license from GB to FSCC. The proposed transfer has yet to be completed and shall be completed upon a consummation of the transfer by the transferring and receiving parties, which will likely occur after the period for appeal of the FCC’s February 9, 2012 decision expires (or 40 days after the decision).

12. Importantly, **the FCC license currently remains in the possession of GB** and will remain in GB’s name until, most likely, the expiration of the appeal period. Judgment Creditor now is faced with the Judgment Debtor’s transfer of this most important asset, and the potential loss of all value of the GB stock. The Judgment Debtor should not be permitted to liquidate his assets in this manner, so as to evade the execution proceedings initiated by Judgment Creditor to attempt to satisfy the lawfully-obtained judgment.

13. Pursuant to Florida Statutes § 56.29(5) the Court may order any property of Judgment Debtor, not exempt from execution, in the hand of any person or due to the judgment debtor to be applied toward the satisfaction of the judgment debt. Further, the Judgment Debtor has the burden of proving that any gift, transfer, assignment or other conveyance has not been made for the purpose of delay, hindrance or defrauding of creditors, and failing that showing, the Court shall direct the Sheriff to take the property to satisfy the execution. Florida Statutes § 56.29(6)(a) – (b).

14. Further, and significantly, this Court has the power to enter any Orders required to carry out the purpose of Florida Statutes § 56 to subject property or property rights of any defendant to execution. Florida Statutes § 56.29(9).

15. The Judgment Creditor requests emergency relief because the Judgment Creditor and counsel only recently, within days, discovered the dilatory and subversive actions of the Judgment Debtor in attempting to transfer the FCC license, the most valuable component to the GB stock – a property that is subject to execution proceedings and which was the direct subject of the Polk County Sheriff's efforts at execution. The Judgment Creditor request emergency relief because the Judgment Debtor's transfer of the FCC license constitutes a fraudulent transfer of the FCC license, and liquidation of the value of the GB stock, and Judgment Creditor would be left with little recourse absent emergency relief – in light of the February 9, 2012 FCC directives. If emergency action is not taken, the Judgment Creditor stands to be greatly damaged

by the transfer of the FCC license and the Judgment Debtor stands to continue to subvert the execution proceedings initiated by the Judgment Creditor.

EMERGENCY INJUNCTIVE RELIEF REQUESTED

16. Pursuant to the Court's authority as granted by Florida Statutes § 56.29(9), the Judgment Creditor requests that the Court enjoin the transfer of the FCC license by GB to FSCC, as the transfer constitutes a fraudulent transfer under the fraudulent transfer statutes.

17. The Judgment Creditor requests that GB and FSCC and be made a part of this action such that the Court may exercise its equitable jurisdiction in enforcement of the Final Judgment issued by the Court on August 8, 2011, and that the caption of this matter be amended to include GB and FSCC for the remainder of these proceedings.

18. At a minimum, the Judgment Creditor respectfully requests that the Court enter an injunction prohibiting GB (and Judgment Debtor) from transferring the FCC license until such a time as an evidentiary hearing, in the appropriate length, can be held to determine the fate of the GB stock and FCC license consistent with the relief requested in the remainder of this motion. The FCC has already indicated that an injunction or stay issued by a local court would most likely suffice to preclude the FCC's approval of the sale/transfer. The license, for the time being, remains in the name of GB and Judgment Creditor respectfully suggests that it is imperative to act without delay.

SEIZURE OF GB STOCK AND APPOINTMENT OF RECEIVER

19. The Judgment Creditor is the proprietor and owner of a different radio station, bearing call symbols WTWB, airing on 1570 AM in the Polk County and surrounding areas. The Judgment Creditor is experienced in the management and operation of a radio station and seeks the transfer of the asset identified as the stock of GB so that the stock in GB may be sold pursuant to Sheriff's Sale in satisfaction of the Final Judgment – but Judgment Creditor also recognizes that GB should be appropriately managed during execution proceedings, so as to have minimal detrimental impact on the value of the stock of GB.

20. The Judgment Creditor seeks an order from this Court levying upon, and otherwise acting as a seizure of, the corporate stock in GB and transferring the same to the Polk County Sheriff's Office so that the same may be held in trust by the Sheriff and sold at a Sheriff's sale pursuant to the provisions of Florida Statutes § 56 (2011).

21. Further, so that the management of the corporation, and more particularly, the "WHNR" radio station, is effectuated appropriately, the Judgment Creditor requests the appointment of a Receiver pursuant to Florida Rule of Civil Procedure 1.620 to manage and control the assets of the Judgment Debtor, more particularly GB and the WHNR radio station. WHNR is the major asset of GB. Judgment Creditor respectfully suggests that a receivership will be the most efficient and effective manner in which to accomplish any necessary seizure and/or transfer of the valuable asset of the corporation, *to wit*: WHNR to the purchaser of the stock of GB.

22. Because the FCC's regulations are controlling with respect to the ownership and/or transfer of the operative FCC license, the Judgment Creditor requests the appointment of George R. Reed of Media Services Group to act as receiver to manage the day-to-day operations of WHNR and ultimately effectuate a transfer in the ownership of the license currently held by GB. Mr. Reed has vast experience in the management and liquidation of assets such as WHNR. Mr. Reed's qualifications are set forth in his curriculum vitae which is attached, and incorporated herein by reference, as Exhibit E. Specifically, as Receiver, the Judgment Creditor requests that the Court permit Mr. Reed to:

- a. Take possession of WHNR, which is located at 1505 Dundee Road, Winter Haven, Florida 33884;
- b. Collect the revenues and profits for the benefit of GB;
- c. Pay all necessary expenditures in connection with the management of WHNR;
- d. Maintain the profits of WHNR in a specially-created bank account to be transferred to the successful purchaser of GB at the Sheriff's sale;
- e. Immediately take any and all necessary steps to request and obtain the FCC's consent to involuntary assignment of the FCC License to the Receiver and/or Polk County Sheriff, and ultimately to the successful purchaser of GB and to pay any and all necessary FCC fees or expenses

associated with any petitions or applications for the effectuation of such transfers;

- f. Take possession of all of WHNR's radio stations, cash, machinery, equipment, furnishings, fixtures, inventory, contract rights, and general intangibles, present and future accounts, accounts receivables, and all books and records relating thereto, all documents and instruments, all of WHNR's rights in, to and under all FCC licenses, and all of GB's other property, real, personal, or mixed;
- g. Continue to operate or cease the operation of the radio station(s) in such a manner as the Receiver shall deem reasonable and proper pursuant to the regulations of the FCC;
- h. Employ agents, accountants, attorneys, employees, and such other persons as the Receiver deems necessary or appropriate for the purpose of preserving and protecting GB's assets (specifically, without limitation, WHNR) and compensate such persons out of the funds of the Receivership;
- i. Negotiate and enter into such contracts and agreements with the Receiver deems necessary or advisable in respect of the radio stations for the preservation and protection of GB's (specifically, without limitation, WHNR's) assets;

- j. Take such actions, as may be reasonably necessary to protect, conserve, and preserve the radio stations, in a manner consistent with the authority granted by the Court and take further authorizations or instructions which the Court may promulgate;
 - k. Pay all expenses of the Receiver (including the cost of securing a fidelity bond) and the receivership incurred in the operation and sale of the radio station or in any way related to the Receiver's duties out of the assets and income GB/WHNR. All expenses and liabilities of the Receiver and of the receivership shall have priority to the assets of the receivership superior to the debts and liabilities of GB and/or WHNR. The Receiver shall have no personal liability for the expenses and liabilities of the Receiver and of the receivership, all such liabilities shall be satisfied, if at all, from the assets of the receivership; and
 - l. Account monthly to the Court and the Polk County Sheriff's Office for the Receiver's receipts and disbursements in the course of such operations.
23. Judgment Creditor further requests injunctive relief in the form of:
- a. Directing GB's and/or WHNR's officers, directors, employees, representatives agents and all other persons to deliver to the Receiver records, property and assets of GB and WHNR of every kind and nature whatsoever, which may be in their possession, custody or control and directing that any such person or entity is restrained and enjoined from

disposing of such records, property or asset in any manner, other than by turning over such records, property or assets to the Receiver;

- b. Directing that any and all banking institutions turn over and deliver to the Receiver all bank accounts of GB and/or WHNR, funds held by them in accounts for the benefit of GB and/or WHNR, and any and all records pertaining to any account whatsoever, opened or closed, individually or jointly, in the name GB and/or WHNR;
- c. Directing that any and all officers, agents, employees, servants and anyone in active concert or participation with WHNR cooperate with the Receiver in order to facilitate the Receiver's taking possession of WHNR, and that any such individual or entity are enjoined from interfering in any way with the Receiver's possession and management of WHNR;
- d. and any other injunctive relief the Court deems just and proper under the circumstances.

24. The Judgment Creditor requests that this Court direct the Polk County Sheriff's Office assist the Receiver in immediate possession of the premises, as retaliation and non-cooperation on the part of the Judgment Creditor, GB, or current occupants of the premises is anticipated.

25. Pursuant to Florida Statutes § 56, the Judgment Creditor is entitled to reasonable attorney's fees and costs associated with these proceedings supplementary and the Judgment Creditor hereby demands such relief.

26. Upon information and belief, as outlined above, the Judgment Debtor has undertaken to transfer or otherwise dissipate any attachable assets, including GB and the WHNR radio station so as to avoid execution on the same and to continue to participate in the management or control of WHNR. Therefore, the Judgment Creditor respectfully requests that the Court conduct a hearing on an expedited basis so as to prevent any unnecessary squandering of the valuable assets of GB and to prevent any fraudulent transfer of the asset and components of the asset as described above. It is imperative that this Court act to preserve those assets and preclude Judgment Debtor from committing any further misrepresentation to Judgment Creditor, the Polk County Sheriff's Office and/or this Honorable Court.

WHEREFORE, the Judgment Creditor, Edward Olivares, by and through undersigned counsel, hereby requests that the Court enter an Order: (1) enjoining the transfer of the FCC from GB to any other entity or person; (2) seizing the corporate stock of GB Enterprises Communication Corp. and transferring the same to the possession of the Polk County Sheriff's Office for levy and sale; (3) appointing George R. Reed as receiver for the management of the day-to-day operations of the WHNR radio station; (4) and directing the Polk County Sheriff's Office to assist with the Receiver's immediate possession of the premise of 1505 Dundee Road, Winter Haven, Florida 33884 and with the Receiver's management and control of the radio station, until a sale of the stock can be effectuated, together with any other such relief as this Court

Edward Olivares v. Martin Santos
Case No. 2009CA-005214
Verified Emergency Motion for Proceedings
Supplementary, Injunctive Relief, Request for
Appointment of Receiver and Motion for
Expedited Hearing
Page 13 of 14

deems just and proper. Furthermore, the Judgment Creditor requests that the Court schedule an expedited hearing on all matters contained in this Motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail to Martin Santos, 5182 Avon Park Cut Off Road, Avon Park, FL 33825 and at Post Office Box 764, Frostproof, FL 33843-0764, this ^{4~~e~~}5 day of February, 2012.

SAUNDERS LAW GROUP

By: 

Alan L. Perez
Florida Bar No.: 0060409
Post Office Box 1279
Bartow, FL 33831-1279
(863) 533-6200
(863) 533-5800 (FAX)
Attorney for Plaintiff

Cc: Honorable J. Michael McCarthy
(via hand delivery)

Edward Olivares v. Martin Santos
Case No. 2009CA-005214
Verified Emergency Motion for Proceedings
Supplementary, Injunctive Relief, Request for
Appointment of Receiver and Motion for
Expedited Hearing
Page 14 of 14

VERIFICATION

DATED this 15th day of February, 2012.

Edward Olivares
EDWARD OLIVARES

STATE OF FLORIDA
COUNTY OF POLK

BEFORE ME, the undersigned Notary Public, authorized in the state and county named above to administer oaths and take acknowledgments, personally appeared Edward Olivares, Plaintiff/Judgment Creditor in the above-reference matter, who is personally known to me or who has produced proper identification, and acknowledged before me that the foregoing document is true and correct to the best of his knowledge and belief. Sworn to and subscribed before me this 15th day of February, 2012.

Identification produced:

FCA. DL. Produced

Mary Jo Jerkins
Printed Name:
Title:
Commission Expires:
Commission No.:



IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT
IN AND FOR POLK COUNTY, FLORIDA

EDWARD OLIVARES,
an individual,

Plaintiff,

v.

MARTIN SANTOS,
an individual,

Defendant.

CASE NUMBER 2009CA-005214
SECTION NUMBER 07

WRIT OF EXECUTION

THE STATE OF FLORIDA
To Each Sheriff of the State:

YOU ARE HEREBY COMMANDED to seize, attach, execute and levy upon the following property belonging to Judgment Debtor, MARTIN SANTOS, of 5182 Avon Park Cut-Off Road, Avon Park, Florida 33825; and/or 2830 Recker Highway, Winter Haven, Florida 33880; and/or Post Office Box 764, Frostproof, Florida 33843 to satisfy the Final Judgment entered on August 8, 2011 to the extent possible:

Any and all executable tangible and intangible personal property and real property, including, but not limited to, that certain property described on Exhibit "A" and Exhibit "B" attached hereto and made a part hereof.

The Final Judgment entered on August 8, 2011 in the amount of \$48,020.85, bears interest at the statutory rate of 6% from August 8, 2011 until paid in full.

Dated: Sept 29, 2011



Richard M. Weiss
Clerk of the Circuit Court

By: Hessenia Perez
As Deputy Clerk

EXHIBIT A

EXHIBIT "A"

1. **Parcel ID: 283230000000013170**

Owner: MARTIN SANTOS

Address: 5182 AVON PARK CUTOFF RD, AVON PARK, FL 33825-5632

Legal Description: LOT 260 OF UNREC COMM HIGHLANDS EAST DESC AS
BEG NW COR OF NE1/4 RUN S 87 DEG 56 MIN E 385.74 FT S 01 DEG 48
MIN 40 SEC W 154.20 FT S 88 DEG 11 MIN 20 SEC E 30 FT TO POB RUN S
88 DEG 11 MIN 20 SEC E 330 FT N 01 DEG 48 MIN 40 SEC E 50 FT N 88 DEG
11 MIN 20 SE W 330 FT S 01 DEG 48 MIN 40 SEC W 50 FT TO POB

Acreage: 0.3788 Acres

2. **Parcel ID: 283230000000013070**

Owner: MARTIN SANTOS

Address: AVON PARK CUTOFF RD FROSTPROOF, FL 33843

Legal Description: BEG NW COR OF NE1/4 RUN S 87 DEG 56' E 385.74 FT S
01 DEG 48' 40" W 704.2 FT S 88 DEG 11' 20" E 30 FT TO POB RUN S 88 DEG
11' 20" E 330 FT N 01 DEG 48' 40" E 200 FT N 88 DEG 11' 20" W 330 FT S 01
DEG 48' 40" W 200 FT TO POB BEING LOTS 249 THRU 252 OF UNREC
COMM HIGHLANDS EAST

Acreage: 1.5151 Acres

3. **Parcel ID: 283230000000013060**

Owner: MARTIN SANTOS

Address: 5024 OLD AVON PARK RD FROSTPROOF, FL 33843

Legal Description: BEG NW COR OF NE1/4 RUN S 87 DEG 56' E 385.74 FT S
01 DEG 48' 40" W 956.20 FT N 88 DEG 11' 20" E 30 FT TO POB RUN S 88
DEG 11' 20" E 330 FT N 01 DEG 48' 40" E 227 FT N 88 DEG 11' 20" W 330 FT
S 01 DEG 48' 40" W 227 FT TO POB BEING LOTS 245 THRU 248 OF UNREC
COMM HIGHLANDS EAST

Acreage: 1.7197 Acres

EXHIBIT "B"

4. 2002 Tilt Tandem Trailer
Registrant: MARTIN SANTOS
Decal Number: 06599265
VIN: 1C9WU30212S678071
License Plate: (FL) N080ZR

5. 1996 Ford Club Wagon Super E350
Registrant: MARTIN SANTOS
Decal Number: 06599379
VIN: 1FBJS31H2THA88225
License Plate: (FL) N852PV

6. 1999 Chevrolet Silverado C2500
Color: Blue/Silver
Registrant: MARTIN SANTOS
Decal Number: 06601044
VIN: 1GCFC29U7XZ171739
License Plate: (FL) N540RT

7. 1998 Ford Club Wagon Super E350
Color: Blue
Registrant: MARTIN SANTOS
Decal Number: 17485756
VIN: 1FBSS31S9WHB00228
License Plate: (FL) 599JUJ

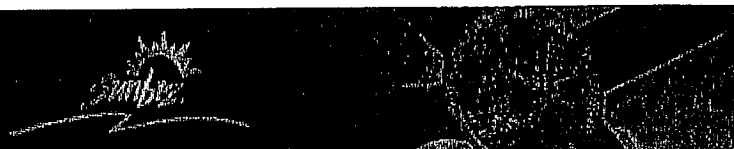
8. 1999 Ford F-350 Super Duty, 4 Door Ext. Cab.
Color: Tan
Registrant: MARTIN SANTOS
Decal Number: 17485708
VIN: 1FTWX33FXEE32891
License Plate: (FL) N541RT

9. Any and all personal property located at the residence of the Judgment Debtor, Martin Santos, to wit: 5182 Avon Park Cut-Off Road, Avon Park, Florida 33825

10. Any and all intangible personal property, including, without limitation, any and all stock certificates, and/or membership certificates, in the following entities:
 - a. M. Santos Enterprise, Inc. (principal address: 5182 Old State Rd. 8N, Avon Park, Florida 33825)

- b. GB WHNR Enterprises Communication Corp. (principal address: 1505 Dundee Rd., Winter Haven, Florida 33844)
- c. GB Enterprises Communications, Corporation (principal address: 1505 Dundee Rd., Winter Haven, Florida 33884)

FLORIDA DEPARTMENT OF STATE DIVISION OF CORPORATIONS



[Home](#) [Contact Us](#) [E-Filing Services](#) [Document Searches](#) [Forms](#) [Help](#)

[Previous on List](#) [Next on List](#) [Return To List](#)

[Events](#) [No Name History](#)

Detail by Officer/Registered Agent Name

Florida Profit Corporation

GB ENTERPRISES COMMUNICATIONS, CORPORATION

Filing Information

Document Number P95000037941
FEI/EIN Number 593311737
Date Filed 05/11/1995
State FL
Status INACTIVE
Effective Date 05/05/1995
Last Event ADMIN DISSOLUTION FOR ANNUAL REPORT
Event Date Filed 09/24/2010
Event Effective Date NONE

Principal Address

1505 DUNDEE RD
WINTER HAVEN FL 33884

Changed 06/22/2001

Mailing Address

1505 DUNDEE RD
WINTER HAVEN FL 33884

Changed 06/22/2001

Registered Agent Name & Address

SANTOS, MARTIN
5182 OLD AVON PARK CUT OFF RD
FROSTPROOF FL 33843 US

Name Changed: 09/23/2009

Address Changed: 09/23/2009

Officer/Director Detail

Name & Address

Title P

SANTOS, MARTIN
5182 OLD AVON PARK CUT OFF RD
FROSTPROOF FL 33843

Annual Reports

Report Year Filed Date

EXHIBIT B

2007 09/22/2009
 2008 09/22/2009
 2009 09/22/2009

Document Images

09/23/2009 -- Amendment	View image in PDF format
09/22/2009 -- CORAPREIWP	View image in PDF format
10/11/2006 -- REINSTATEMENT	View image in PDF format
09/27/2005 -- REINSTATEMENT	View image in PDF format
09/22/2004 -- REINSTATEMENT	View image in PDF format
10/22/2003 -- DEBIT MEMO DISSOLUTI	View image in PDF format
05/07/2003 -- ANNUAL REPORT	View image in PDF format
10/21/2002 -- ANNUAL REPORT	View image in PDF format
06/22/2001 -- REINSTATEMENT	View image in PDF format
04/01/1999 -- ANNUAL REPORT	View image in PDF format
04/20/1998 -- ANNUAL REPORT	View image in PDF format
04/22/1997 -- ANNUAL REPORT	View image in PDF format
03/27/1996 -- ANNUAL REPORT	View image in PDF format
05/11/1995 -- DOCUMENTS PRIOR TO 1997	View image in PDF format

Note: This is not official record. See documents if question or conflict.

[Previous on List](#) [Next on List](#) [Return To List](#)

[Events](#) [No Name History](#)

| [Home](#) | [Contact us](#) | [Document Searches](#) | [E-Filing Services](#) | [Forms](#) | [Help](#) |

Copyright © and Privacy Policies
 State of Florida, Department of State

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0010 (October 2009)	FOR FCC USE ONLY
FCC 323 OWNERSHIP REPORT FOR COMMERCIAL BROADCAST STATIONS		FOR COMMISSION USE ONLY FILE NO. BOA-20111130MZO

Section I - General Information

1.	Legal Name of the Respondent GB ENTERPRISES COMMUNICATIONS CORPORATION			
	Street Address (1)	1505 DUNDEE RD		
	Street Address (2)			
	City	State or Country (if foreign address)	ZIP Code	
	WINTER HAVEN	FL	33884 -	
	Telephone Number (include area code)	E-Mail Address (if available)		
	8632991141	WHNR1360AM@YAHOO		
	FCC Registration Number:	Call Sign	Facility ID Number	
	0009590217	WHNR	21766	
2.	Contact Representative VERONICA PEREZ	Firm or Company Name WHNR1360AM		
	Street Address (1)	1505 DUNDEE RD		
	Street Address (2)			
	City	State or Country (if foreign address)	ZIP Code	
	WINTER HAVEN	FL	33884 -	
	Telephone Number (include area code)	E-Mail Address (if available)		
	8632991141	VPEREZ2483@YAHOO.COM		
3.	Nature of Respondent (See Instructions for definitions) <input checked="" type="radio"/> Licensee <input type="radio"/> Permittee <input type="radio"/> Entity with an attributable interest			
4.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Fee-exempt Report <input type="radio"/> Other Other <input checked="" type="radio"/> N/A (Fee Required)			
5.	All of the information furnished in this Report is accurate as of 10/01/2011 (Date entered must (1) be Oct. 1 of the filing year when filing a Biennial Ownership Report (or Nov. 1, 2009 in the case of the initial filing); or (2) be no more than 60 days prior to the date of filing when filing a non-biennial Ownership Report.)			
6.	Purpose: This Report is filed for: (choose one)			
	a.	<input checked="" type="radio"/> Biennial		
	b.	<input type="radio"/> Validation and Resubmission of a previously filed Biennial Report (certifying no change from previous Report)		
	c.	<input type="radio"/> Transfer of Control or Assignment of License/Permit		
	d.	<input type="radio"/> Report by Permittee filing within 30 days after the grant of a construction permit for a new commercial AM, FM or full power television broadcast station.		
	e.	<input type="radio"/> Update / certification of accuracy of an initial Ownership Report filed by Permittee (filing in conjunction with Permittee's application for a station license)		

f. <input type="radio"/> Amendment to a previously filed Ownership Report If an Amendment, submit as an Exhibit a listing by Section and Question Number the portions of the previous Report that are being revised.	File Number: - [Exhibit 1]										
7. Licensee and Station Information. The stations listed below are all licensed to the following person or entity:											
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 2px;">Licensee Name</td> <td style="padding: 2px;">Licensee's FCC Registration Number (FRN)</td> </tr> <tr> <td style="padding: 2px;">GBECC CORP</td> <td style="padding: 2px;">0009590217</td> </tr> </table>	Licensee Name	Licensee's FCC Registration Number (FRN)	GBECC CORP	0009590217							
Licensee Name	Licensee's FCC Registration Number (FRN)										
GBECC CORP	0009590217										
Station List This Report is filed for the following stations:											
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Copy</th> <th style="width: 20%;">Call Sign</th> <th style="width: 15%;">Facility ID Number</th> <th style="width: 30%;">Location (City/State)</th> <th style="width: 25%;">Class of service</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1.</td> <td style="text-align: center;">WHNR</td> <td style="text-align: center;">21766</td> <td style="text-align: center;">CYPRESS GARDENS , FLORIDA</td> <td style="text-align: center;">AM Station</td> </tr> </tbody> </table>		Copy	Call Sign	Facility ID Number	Location (City/State)	Class of service	1.	WHNR	21766	CYPRESS GARDENS , FLORIDA	AM Station
Copy	Call Sign	Facility ID Number	Location (City/State)	Class of service							
1.	WHNR	21766	CYPRESS GARDENS , FLORIDA	AM Station							
8. Respondent is:											
<table style="width:100%;"> <tr> <td style="width: 33%;"><input type="radio"/> Sole Proprietorship</td> <td style="width: 33%;"><input type="radio"/> Not-for-profit corporation</td> <td style="width: 33%;"><input type="radio"/> Limited partnership</td> </tr> <tr> <td><input checked="" type="radio"/> For-profit corporation</td> <td><input type="radio"/> General partnership</td> <td><input type="radio"/> Other</td> </tr> </table> If "Other," describe nature of the Respondent in an Exhibit. [Exhibit 2]		<input type="radio"/> Sole Proprietorship	<input type="radio"/> Not-for-profit corporation	<input type="radio"/> Limited partnership	<input checked="" type="radio"/> For-profit corporation	<input type="radio"/> General partnership	<input type="radio"/> Other				
<input type="radio"/> Sole Proprietorship	<input type="radio"/> Not-for-profit corporation	<input type="radio"/> Limited partnership									
<input checked="" type="radio"/> For-profit corporation	<input type="radio"/> General partnership	<input type="radio"/> Other									

Section II-B - Biennial Ownership Information

1.	Contract Information. List all contracts and other instruments required to be filed by 47 C.F.R. Section 73.3613. (Only Licensees, or Respondents with a majority interest in or that otherwise exercise <u>de facto</u> control over the subject Licensee shall respond. Other Respondents should select "Not Applicable" in response to this question.) If the agreement is a local marketing agreement (LMA) or a radio joint sales agreement (JSA), or if the agreement is a network affiliation agreement, check the appropriate box; otherwise, select "Other" for non-LMA/radio JSA or network affiliation agreements. <input checked="" type="checkbox"/> Not Applicable [Enter Contract Information]			
2.	Capitalization (Only Licensees or entities with a majority interest in or that otherwise exercises <u>de facto</u> control over the subject Licensee shall respond.) <input checked="" type="checkbox"/> Not Applicable [Enter Capitalization Information]			
3. (a.)	Ownership Interests. This Question requires Respondents to enter detailed information about ownership interests by generating a series of subforms. Answer each question on each subform. The first subform listing should be for the Respondent itself. If the Respondent is not a natural person, also list each of the officers, directors, stockholders, noninsulated partners, members and other persons or entities with a direct attributable interest in the Respondent. (A "direct" interest is one that is not held through any intervening companies or entities.) In the case of vertical or indirect ownership structures, report only those interests in the Respondent that also represent an attributable interest in the Licensee for which the Report is being submitted. List each person or entity with a direct attributable interest in the Respondent separately. Entities that are part of an organizational structure that includes holding companies or other forms of indirect ownership must file separate ownership reports. In such a structure do not report or file separate reports for persons or entities that do not have an attributable interest in the Licensee for which the report is being submitted. <p style="text-align: center;">Ownership Interests Information</p> <table border="1" style="width:100%; border-collapse: collapse; margin-top: 10px;"> <tr><td style="height: 20px;"> </td></tr> <tr><td style="height: 20px;"> </td></tr> <tr><td style="height: 20px;"> </td></tr> </table>			

Copy 1.	Name	MARTIN SANTOS
	Address	Street PO BOX 764 City/State FROSTPROFF , FLORIDA Postal/ZIP Code 33843 - Country (if not U.S.)
	Listing Type	<input checked="" type="radio"/> Respondent <input type="radio"/> Other Interest Holder
	Relationship to Licensee	<input checked="" type="radio"/> Licensee (or Officer/Director of Licensee) <input type="radio"/> Person with attributable interest <input type="radio"/> Entity with attributable interest
	Positional Interest (Check all that apply)	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> General Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> LC/LLC/PLLC Member <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Creditor <input type="checkbox"/> Attributable Investor <input type="checkbox"/> Other (please specify):
FCC Registration Number	9990051816	
Gender, Ethnicity, Race and Citizenship Information (Natural Persons)	<input type="checkbox"/> N/A (entity)	
	Gender <input checked="" type="radio"/> Male <input type="radio"/> Female	
	Ethnicity <input checked="" type="radio"/> Hispanic or Latino <input type="radio"/> Not Hispanic or Latino	
	Race <input type="radio"/> American Indian or Alaska Native <input type="radio"/> Asian <input type="radio"/> Black or African American <input type="radio"/> Native Hawaiian or Other Pacific Islander <input checked="" type="radio"/> White <input type="radio"/> Two or more races	
	Citizenship US	
	Percentage of votes	100.0 %
	Percentage of equity	100.0 %
	Percentage of total assets (equity debt plus)	100.0 %

(b.)	<p>Respondent certifies that any equity and financial interests not reported in response to Question 3 (a) are non-attributable.</p> <p>If "No," submit as an Exhibit an explanation.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 3]</p>
(c.)	<p>Does the Respondent or any person/entity with an attributable interest in the Respondent also hold an attributable interest in any other broadcast station, or in any newspaper entities in the same market, as defined in 47 C.F.R. Section 73.3555?</p> <p>If "Yes", provide information describing the interest(s), using EITHER the subform OR the spreadsheet option below for the applicable type of interest (broadcast or newspaper). Respondents with a large number (50 or more) of entries to submit should use the spreadsheet option. NOTE: Spreadsheets must be submitted in a special "XML Spreadsheet" format with the appropriate structure that is specified in the documentation. For instructions on how to use the spreadsheet option to complete this question (including templates to start with), please Click Here.</p> <p>[Broadcast Interests Subform]</p> <p>[Newspaper Interests Subform]</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>
(d.)	<p>Are any of the individuals listed in response to Question 3(a) married, related as parent-child, or related as siblings?</p> <p>If "Yes", complete the information describing the relationship.</p> <p>[Enter Familial Relationships Information]</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>
(e.)	<p>Is Respondent seeking an attribution exemption for any officer or director with duties unrelated to the Licensee ?</p> <p>If "Yes", complete the information in the required fields and submit an Exhibit fully describing that individual's duties and responsibilities, and explaining why that individual should not be attributed an interest.</p> <p>[Enter Attribution Exemption Information]</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p>
4.	<p>Respondent's Interests Held. Each Respondent other than a Licensee should list the name and FCC Registration Number of all entities in which the Respondent holds a direct attributable ownership interest, where that listed entity has an attributable ownership interest in the Licensee of the stations associated with the Report. Licensees should select "N/A" in response to this question.</p> <p>For any listing that includes the name of a person or entity reported on multiple Ownership Reports, ensure that the FRN information is consistent among all such Ownership Reports. Respondents should coordinate with each other to ensure such consistency.</p> <p>[Enter Respondent Interests Held Information]</p>	<p><input checked="" type="checkbox"/> N/A</p>
5.	<p>Organizational Chart. LICENSEES ONLY: Attach a flowchart or similar document showing the Licensee's vertical ownership structure including the Licensee and all persons/entities that have attributable interests in the Licensee.</p> <p>Non-Licensee Respondents should select "N/A" in response to this question.</p>	<p><input type="checkbox"/> N/A [Exhibit 5]</p>

SECTION III - CERTIFICATION

I certify that I am MARTIN SANTOS, PRESIDENT

(Official Title)

of G.B. ENTERTAINMENT COMMUNICATIONS CORP.

(Exact legal title or name of Respondent)

and that I have examined this Report and that to the best of my knowledge and belief, all statements in this Report are true, correct and complete.

(Date of the signature below must (1) be no earlier than Oct. 1 of the filing year when filing a Biennial Ownership Report (and no earlier than Nov. 1, 2009 in the case of the initial filing); or (2) be no more than 60 days prior to the date of filing when filing a non-biennial Ownership Report.)

Signature MARTIN SANTOS	Date 11/01/2009
Telephone Number of Respondent (Include area code) 8632991141	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 512(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 5

Description: CORPORATE STRUCTURE FOR G.B. ENTERTAINMENT COMMUNICATIONS CORP.

GB ECC IS COMPOSED OF A SINGLE STOCKHOLDER HOLDING THE POSITION OF PRESIDENT OF THE CORPORATION. NO OTHER OFFICERS, DIRECTORS OR INVESTORS ARE PARTY TO THIS CORPORATION.



Federal Communications Commission
Washington, D.C. 20554

February 9, 2012

In Reply Refer to:
180083-BSE

Carlos Guerrero, Member
La Poderosa, LLC
c/o Barry D. Wood, Esq.
3300 Fairfax Drive, Suite 202
Arlington, VA 22201

Florida Spanish Communications Corp.
c/o Barry A. Friedman, Esq.
Thompson Hine LLP
1920 N Street NW, Suite 800
Washington, DC 20036-1600

Martin Santos, President
GB Enterprises Communications Corp.
1565 Dundee Road
Winter Haven, FL 33834

In re: WHNR(AM), Cypress Gardens,
Florida
Facility ID No. 21766
File No. BAL-20110810AAB

Application for Assignment of License
Petition to Deny

Dear Mr. Santos and Counsel:

We have before us the above-referenced application (the "Assignment Application") seeking approval for the proposed assignment of license for Station WHNR(AM), Cypress Gardens, Florida (the "Station"), from GB Enterprises Communications Corp. ("GB") to Florida Spanish Communications Corp. ("FSCC"). On September 12, 2011, La Poderosa, LLC, and Carlos Guerrero, who owns that company, ("collectively, Petitioners") filed a Petition to Deny ("Petition") the Assignment Application.¹ For the reasons stated below, we deny the Petition and grant the Assignment Application.

Background. Petitioners state that that they made loans to GB and to GB's President and 100 percent stockholder, Martin Santos ("Santos"), which have not been timely repaid. The Petition notes that "Petitioners have initiated arbitration proceedings in Florida seeking to collect on the debt and for other remedies against Santos and [GB]."² Petitioners assert that GB seeks to assign the Station in order to avoid payment of money that GB and Santos are contractually obligated to pay to Petitioners.

¹ On November 25, 2009, FSCC filed an Opposition to Petition to Deny. Petitioners filed a Supplement to Petition to Deny on October 4, 2011, a Motion for Extension of Time on October 5, 2011, and a Reply to Opposition to Deny on October 12, 2011.

² Petition at 2.

EXHIBIT D

Commission. We find that the contractual issues raised by Petitioners constitute a private controversy. The Commission has consistently held that it is not the proper forum for the resolution of such private disputes, and that parties should seek redress for such matters in local courts of competent jurisdiction.

Furthermore, Petitioners have not provided evidence of an injunction or a stay issued by a local court regarding the proposed sale. In the absence of such an order from a local court, the Commission has routinely acted favorably on license assignment applications. We note, however, that Commission grant of an assignment or transfer of control application merely finds that the parties are qualified under, and the proposed transaction does not violate, the Communications Act of 1934, as amended, or the Commission's rules and policies. As such, our action is permissive only and does not prejudice any relief to which the parties may ultimately be entitled.

Conclusion/Actions. Based on the above, we find that Petitioners have not raised a substantial and material question of fact warranting further inquiry. We further find that FSCC is qualified to hold the license for Station WHNR(AM), Cypress Gardens, Florida, and that grant of the Assignment Application is consistent with the public interest, convenience and necessity. Accordingly, **IT IS ORDERED**, that La Poderosa, LLC and Carlos Guerrero's September 12, 2011, Petition to Deny **IS DENIED**, and that the application for approval to assign the license for Station WHNR(AM), Cypress Gardens, Florida (File No. BAL-20110810AAB) from GB Enterprises Communications Corp. to Florida Spanish Communications Corp. **IS GRANTED**.

Sincerely,

Peter H. Doyle/td
Peter H. Doyle
Chief, Audio Division
Media Bureau

³ See *John F. Runner, Receiver (KRIF)*, Memorandum Opinion and Order, 36 RR 2d 773, 778 (1976); *Decatur Telecasting, Inc.*, Memorandum Opinion and Order, 7 FCC Rod 8622 (1992).

George R. Reed

Media Services Group, Inc.
149 Roscoe Blvd. South
Ponte Vedra, FL 32082

Office: (904) 285-3239
Fax: (904) 285-5618
Cell: (904) 631-7093

E-mail: George@MediaServicesGroup.com
LinkedIn: www.linkedin.com/in/georgerreed
Twitter: www.twitter.com/GeorgeReedRadio

SUMMARY OF QUALIFICATIONS

- Over thirty-nine years in the broadcasting industry with experience in programming, sales, management, ownership, consulting, appraising and brokering.
- Over twenty-four years as a broadcast industry broker/consultant. Co-founder of Media Services Group in 1989; Managing Director since 2003.
- Consult numerous broadcasting companies and have assisted in transactions totaling approximately \$1 billion.
- Have served as court appointed receiver for two broadcasting companies resulting in successful sales of both.
- Experienced business planner and financial analyst. Perform due diligence studies and market reports.
- Extensive appraisal and expert testimony experience.
- Consult clients to arrange financing for station acquisitions and refinancing.

- Formed and launched three different broadcasting companies handling station acquisitions and operations.
- Formed and launched successful tower company.
- One of the country's most successful major market sales managers, driving net billings from less than \$1 million to \$12.5 million in eight years utilizing innovative pricing and yield management techniques.
- Frequent guest speaker at industry forums, including Kagan Radio Finance conferences, Radio Advertising Bureau, National Association of Broadcasters, and state broadcast association conventions.

EDUCATION AND TRAINING

Georgia State University Executive M.B.A. Program	M.B.A. in 1984
Mercer University in Atlanta	B.B.A. in 1982
University of Miami Intensive Language--Spanish	1997 1998 2008
Licensed Florida Real Estate Broker	1990 - present
RAB Sales Manager School, Wharton School of Business	1987
Certified Radio Marketing Consultant (223rd in the country)	1977

PROFESSIONAL EXPERIENCE

- **Media Services Group/Chapman Associates**
Ponte Vedra, FL
1987 - Present

Appraisal, consulting and brokerage assignments. Transaction volume approaching \$1 billion. Founding member, officer, and Managing Director and shareholder of Media Services Group, Inc. Numerous appraisals, business plans, and consulting reports. Arrange financing for station buyers. Developed software for transaction analysis and extensive client data base. Developed and presented numerous panels, seminars, and training programs. Expert witness testimony in Federal and State Courts and court appointed Receivership work. Former President National Association of Media Brokers.

www.MediaServicesGroup.com
<http://georgereedradiotv.blogspot.com/>

- **MSG Radio, Inc., Ponte Vedra, FL**
2009 - Present

Formed company to acquire WIAC-FM on San Juan, PR. Developed management team. Negotiated and closed the transaction. Launched new format.

<http://www.hot102pr.com/Hot102/Principio.html>

- **Monticello Media, LLC**
Ponte Vedra, FL
2007 - Present

Formed company to acquire six radio stations in Charlottesville, VA. Developed management team. Negotiated and closed the transaction. Launched two new formats.

<http://monticellomedia.com/>

- **USAntenna, Inc.**
Ponte Vedra, FL
2000 - Present

Co-founded company to develop and operate tower sites in the southeast.

www.USAntenna.net

- **Aisling Broadcasting of Banner Elk, LLC**
Boone, NC
2008 - 2009

Court appointed Receiver.

- **Eagle Broadcasting**
Jacksonville, FL
1993 - 1996

Court appointed Receiver.

- **Jettcom, Inc.**
1986 - 1993

Negotiated the purchase and financing of WJTT-FM, Chattanooga. Wrote the initial business plan and financial projections. Developed in-house sales training. Assisted in management as President of Corporation. Served on Board of Directors.

➤ **WVEE/WAOK**
Atlanta, GA,
1977 - 1987
(Plough Broadcasting & DKM Broadcasting)

General Sales Manager of combo, 6/83 - 11/87; WVEE, from 11/79 - 6/83. One of the country's top billing radio stations (always among the top three in Atlanta). Consistently set sales records throughout both companies. Account Executive for former AM station (WPLO), 7/77 - 11/79. As sales manager built net revenue from one million to \$12.5 million dollars. Reduced cost of sales. Recruited and promoted several star performers. Assisted company in 1983 by managing Memphis stations until a permanent G.M. could be named. Assisted in company-wide implementation of computer system. Fully automated the sales department. Participated in all station research, marketing and promotional activities.

➤ **Various**
1972 - 1977

Sales and programming experience at WHOO-AM/FM, Orlando; WSIR, Winter Haven, FL; WVJS/WSTO/Owensboro Cablevision, Owensboro, KY; WKCM, Hawesville, KY; WTCJ, Tell City, IN.

PRESENTATIONS AND PUBLICATIONS

- Speaker, "Kellar Radio Farm System Institute/Kellar Radio Talent Institute," Appalachian State University, Boone, NC, July, 2008; July, 2011
- Interviewed for "Publisher's Profile," R&R, November 30, 2001.
- Speaker, "World's First Investors Summit on Radio," IRS-Montreux 1998 International Radio Symposium and Technical Exhibition, Montreux, Switzerland, June, 1998
- Interviewed for "Radio Landed Squarely in the Middle of Wall Street in 1997," Frank Montero, *Tuned In*. December, 1997.
- Panelist on "Broadcast Financing for the 1990's: Preparing for Change in Law and Regulation." National Association of Broadcasters, New Orleans, LA. September 7, 1995.
- Speech on "The Changing Environment in Radio." Fourth District American Advertising Federation conference in Jacksonville, FL. July 25, 1992.
- Presented conference on "Buying Selling and Financing Radio Stations in Today's Market." Atlanta, GA. June 15, 1989.
- Reed, G. (April 28, 1986). "High Tech Comes to the Sales Departments." "Broadcasting" magazine.
- Panelist on numerous occasions for state and national broadcasting associations and Paul Kagan's Radio Station Values conferences.
- Articles or interviews have been published in "Broadcasting & Cable," "Radio Only," "Tuned In," "Pulse," "Radio Business Report," "Radio World," and various state broadcasting association newsletters.
- Publisher of *George Reed's Radio/TV Station Trading Views*
<http://georgereedradiotv.blogspot.com/>

AWARDS

1975 WHOO "Rookie of the Year"
1976 WHOO "Most Improved Salesman"
1979 WPLO "Salesperson of the Year"
1986 "Outstanding Young Man in America"
1987 "Sales Manager of the Year" for DKM Broadcasting
1987 Commendation for service as an officer and Board
member of the Atlanta Broadcast Advertising Club
(ABAC)
1990 "Who's Who in Advertising"
1990 "Who's Who in Finance"

MEMBERSHIPS

- Former President, National Association of Media Brokers, 1999 - 2001
- Former Vice President, National Association of Media Brokers
- Member of the Board of Directors, Georgia Association of Broadcasters, 2001-Present
- Member of the Board of Directors, North Carolina Association of Broadcasters, 2001-Present
- Former Member of the Board of Directors, John Bayliss Broadcast Foundation, 2002-2010
- National Association of Broadcasters
- Kentucky Broadcasters Association
- Puerto Rico Broadcasters Association
- Tennessee Association of Broadcasters
- Indiana Association of Broadcasters
- Virginia Association of Broadcasters
- Former member of the Steering Committee for the Georgia State University Executive MBA Club
- Former member of the Board of Directors of the Atlanta Broadcast Advertising Club (ABAC)
- Former officer for Atlanta Ad Club 2
- Former member of the Board of Governors for Lake Lanier Sailing Club
- Member, Ponte Vedra United Methodist Church
- Group Area Coordinator, Methodists United in Prayer (Cuba-Florida)

EXPERT EXPERIENCE

- 1) **U. S. District Court for the Eastern District of Tennessee-Northern Division**

Jacob Broadcasting Co. Inc. v. John Strelitz and CBS Broadcast Group, Ltd. No. CIV3-90-750
Qualified as an expert. The testimony centered on radio station valuations. 6/3/92

- 2) **Superior Court, Chattanooga, TN**

Benns v. Benns
Qualified as an expert. The testimony centered on the valuation of a suburban Knoxville, TN, FM radio station. 8/26/92

- 3) **Wake County (NC) Superior Court**

First Union National Bank of NC v. Eagle Broadcasting, Inc.
No. CVS 01846
Receiver for the Company and provided testimony in the case on numerous occasions. 1993-1996

- 4) **Court of Common Pleas for the Ninth Judicial Circuit State of South Carolina, County of Charleston**

Jermar, Inc. v. L.M. Communications II of SC, Inc.
No. 95-CP-10
Qualified as an expert. The testimony centered on the merits of appointing a receiver to protect radio station assets. 12/14/95

- 5) **U. S. Bankruptcy Court of the Southern District of GA**

Jones Eastern Radio of Augusta, Inc.
No. 95-11060
Broker for the Debtor in Possession.

- 6) **Circuit Court of the 15th Judicial Circuit, Palm Beach County, Florida**

Salva v. Rivers
Case No. 93-9077 AH
Testimony centered on executive compensation and expertise of the company management.

March 18, 1996

7) **Fulton County (GA) Superior Court, Atlanta, Georgia**

Elaine Elliot v. Bob Elliot
Civil Action File No. E-39879
Testimony centered on radio station valuations and valuation techniques.
June 6, 1996

8) **United States District Court, Middle District of Florida, Tampa Division**

DeSoto Broadcasting, Inc. vs. Comcast Cablevision of West Florida, Inc.
Case No. 96-1581-CIV-T-24A
Provided testimony on valuation of television stations and the television industry.
January, 1998

9) **American Arbitration Association**

Channel 46 of Tucson, Inc., and Sungilt Corporation, Inc., and Paxson Communications of Tucson-46, Inc.
January, 2000

10) **Superior Court of New Jersey**
Law Division - Bergen County
Docket No. BER-L-9443-97

Universal Broadcasting of New York, Inc. v. Putbrese, Hunsaker & Trent, P.C., et. Al.

11) **Court of Common Pleas**
Erie County, PA
Docket No. 10263-1999

Arkelian v. Times Publishing Company
July, 2000

12) **Federal Communications Commission**
Declaration in Support of Satellite Operation of KHIZ-TV
September 15, 2000

- 13) **Circuit Court of Mobile County, Alabama**
Civil Action No. 99-3043

William H. Phillips v. Barry Wood, et. al.

- 14) **Federal Communications Commission**
Declaration regarding the viability of WBCK(AM), Battle
Creek, MI, for Cumulus Licensing LLC
November, 2006

- 15) **Buncombe County (NC) Superior Court**

Branch Banking and Trust Company v. Aisling Broadcasting of
Banner Elk, LLC, et. al.
No. 07 CVS 05031
Receiver for the Company. 2008 - 2009.

- 16) **State of Michigan In The Superior Court for the County of
Macomb**

O'Neil Swanson, James Panagos, Horace L. Sheffield III, Kathryn
Sheffield and Lavonne Sheffield-McClain v. Adell Broadcasting
Corporation et. al.
Case No. 07-1202-CB
2009