

State of New Mexico
Seventh Judicial District Court
County of Socorro

Green Lion Media LLC
T. Reese Janca Executor

v

Steve Edmondson, d/b/a
Socorro Community Radio, LLC.

Case No#: D-725-CV-2017 -00232

August 1, 2022

REQUESTS FOR PRODUCTION

Defendant named as an Individual Party in the Complaint before the Court, by Pro Se representation, files a Requests for Production seeking from the Court and/or Plaintiff, Court recorded documents, evidence and findings of material fact which demonstrate the Defendant was found by a ruling of the Court to be in breach of the terms of 'Repossession Clause' within the original Plaintiff 'Exhibit A' entered into Court records on 12/22/2017 with the original complaint for 'Matter of Money Due and Repossession' and under Court Order to transfer assets before April 2nd 2018.

The documents required for production by the Court and/or Plaintiff:

- 1) **COURT RULING** from March 19th, 2018, Hearing with material facts and evidence in Court Records that the Defendant was in breach of the Plaintiff's 'Repossession Clause' by greater than 90 days and entitled to recovery of all assets as described within Exhibit A of the Original Complaint therein filed on December 22nd 2017.
- 2) **COURT ORDER** from March 19th 2018, Hearing and/or prior to March 29th 2018, directing the Defendant to make his personage, and private property available to

the Plaintiff to TRANSFER ANY ASSETS covered in the Original Complaint's Exhibit A 'Repossession Clause' between **March 29th, 2018, to April 1st 2018** and/or preceding **APRIL 22ND TO APRIL 26, 2018** as dates of travel claimed by PLAINTIFF'S filed MAY 16TH 2018 AFFIDAVIT.

- 3) **COURT ORDER** claimed by Plaintiff in filed **APRIL 2ND 2018 "MOTION FOR RETURN OF ITEMS AND CESSATION OF ANY ALLIED RELATED RADIO OPERATIONS"**; Court AND/OR Plaintiff is requested to produce the 'COURT ORDER' in statement 14.

*"14. In that regard, the Court's intervention is necessary to effectuate this transfer **in compliance with the Court Order** hearing and federal regulations."*

Defendant asserts Plaintiff's Attorney Mark Filosa and Steven L. Edmondson knew on March 25th that no 'Court Order' was in effect ordering Mr. Janca to transfer assets on March 30th 2018 or on April 2nd 2018:

"I will come and get the equipment at the end of the week if we can get him to agree to give it to us or compel him to give it to us."

Exhibit A -March 25th 2018 Plaintiff Email Exchange

Plaintiff clearly acknowledges the 'October 24 2017....I can now run the station legally from Iowa' during the sale as the motivation behind his fraudulent and frivolous lawsuit and on April 2nd 2018, the abuse of process in a malicious prosecution for a complaint unripe for judgement and without legal standing filed on December 22, 2017, continues with a Motion '**claiming compliance with a Court Order**' for which the Plaintiff was awarded attorney fees and expenses by the Court harming the Defendant.

Inability or Refusal to Produce Records by Court and/or Plaintiff

If the Court and/or Plaintiff is UNABLE OR UNWILLING to provide official records indicating that a **Court Ruling** upon the material facts and evidence within the terms of the Original Complaint Exhibit A 'Repossession Clause' was breached by the Defendant and subsequently that a **Court Order** was entered by March 29th, 2018, and no later than April 2nd 2018 which ordered the Defendant to transfer assets acquired through the sale of the radio station, the Defendant is entitled to all court cost, attorney fees and monies collected by the Plaintiff related to the 'Contempt Order' as an intentional tort through at minimum an 'abuse of process' which may upon Counter Claims conclusion may seek further counts and damages for 'malicious prosecution'. Court has set precedence in awarding attorneys fees related to the 'Contempt Order' for the Plaintiff's enrichment.

Summary

The deliberate abuse of process by the Plaintiff through false claims, statements and or misrepresentation with the Court in respect to NON-EXISTENT COURT ORDERS to further enrich the Plaintiff; may underly 'malicious prosecution' and/or 'abuse of process' is an intentional tort within Civil Law for which the Defendant is entitled to damages directly resulting from litigation addressing an 'abuse of process' by the Plaintiff from an intentional manipulation of the Court through false statements and intentional pursuit to gain from breach of contract and financially disable the Defendant through abuse of process.

Defendant respectfully requests the documents, records and exhibits be Produced by the Court and/or Plaintiff before any further Hearings or Motions to Dismiss based upon 'Contempt Order' premise are heard or considered further on the matter.

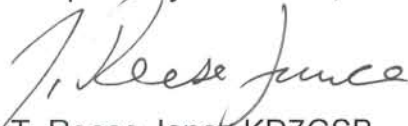
Exhibits

Exhibit A -March 25th 2018 Plaintiff Email Exchange

ADDENDUM

No federal regulations apply to contractual issues of property or assets with a radio broadcast station sale and the Plaintiff willingly and intentionally DID NOT NOTIFY the FCC of Plaintiff's Transfer of the Station within 45 days upon intention to transfer; failing to fulfill the Contract contingencies, acting in bad faith, and breaching the Contract within 45 days of sale. Plaintiff has been found guilty and fined by the FCC for failure to file the transfer committing an unauthorized transfer of the license.

Respectfully submitted,



T. Reese Janca KD7GSB
Green Lion Media LLC
P.O. Box 949
Socorro, NM 87801
www.minecountry1021.com
(575) 200-4872

EXHIBIT A -March 25th 2018 Plaintiff Email Exchange

Email 3-26-2018

New FCC Rules on Station Operation

New FCC rules make it even more important that assets be recovered

Inbox



Steve Edmondson <sle434@gmail.com>

Sun, Mar 25,
2018, 11:33 PM

to Mark

Mark,

I have learned that on October 24, 2017 the FCC changed the rules regarding station ownership and that I can now run the station legally from Iowa with only the need for a local telephone number or an 800 number so that I can be reached. We can tell Mr. Janca that we have found a manager to run the station and we need the equipment so that we can get it back on the air. We do not have to and should not tell him that I will be the manager.

I need to have him give me back control of any and everything related to the station immediately. He has effectively conceded that I am the owner of the station at this point and I see no reason for him to maintain control of any aspect of it. In their answer to our complaint they said the following: "Plaintiff has always maintained ownership of any assets in which they now claim a security interest, which have not been transferred to the Defendants." and also "There is nothing for the Special Master to sell, as the Defendants do not own any of the radio stations (sic) assets, including the FCC license." If that is the case how can they refuse to return these assets upon our demand?

I will come and get the equipment at the end of the week if we can get him to agree to give it to us or compel him to give it to us. Please contact me at your earliest possible convenience so that we can discuss how to proceed in light of this new information.

Affidavit of Service

I declare under penalty of perjury that a copy of this motion was served by electronic transmission to dean@borderlawoffice.com on this 1st Day of August, 2022.

T.R. Janca
P.O. Box 949
Socorro, NM 87801
(575) 200-4872