

Service: FM Purpose: Renewal of License  
Status: Pending Status Date: 05/28/2021 Filing Status: Active  
New Mexico City: SOCORRO  
File Number: 0000148035 Submit Date: 05/28/2021  
Call Sign: KYRN Facility ID: 164088 FRN: 0022035885

## Petition to Deny of Green Lion Media LLC.

Tom R. Janca KD7GSB  
Executive Engineer

Green Lion Media LLC  
P.O. Box 949  
Socorro, NM 87801  
(575) 835-2382

August 23, 2021

<b>Introduction</b> .....	3
<b>Summary</b> .....	4
<b>Argument the initial 2014 consummated license transfer of the KYRN was indirect unlawful transfer through dubious means which should not be renewed.</b> .....	8
<b>Argument in 2017 Edmondson committed an unauthorized transfer of control when placing the KYRN station for sale, closing the local studio and leaving the community of coverage.</b> .....	10
<b>Argument Edmonson’s character issues and falsified communications with the Commission should disqualify his license renewal application.</b> .....	11
<b>Falsified Attachments to Renewal Application 0000148035</b> .....	12
<b>Conclusion</b> .....	15

## Introduction

Green Lion Media LLC. (GLM) petitions the Commission to deny application for renewal of Steve Edmondson File Number: 0000148035 having been the recipient of an unauthorized transfer in violation 47 U.S.C. § 310(d). in 2014 and committing an unauthorized transfer in 2017 in the sale and transfer to Green Lion Media LLC., harming petitioner through intentionally not filing the transfer of control as requested by the buyer prior to the 45-day expiration and following receipt of the full agreed purchase price in court escrow and refusing the 8<sup>th</sup> formal attempt to request transfer of the license on March 6th, 2018, as contracted to perform upon transferring the station control in June 2017. The renewal of the license would allow an individual with character issues who falsified multiple communications with the Commission to continue to act with impunity, disrespect for the Communications Act, and set a precedent of enforcement neglect where private and public harm has been intentionally done by Steve Edmondson. GLM, has not be compensated for 10 months of local station studio operation in the community of coverage while Edmondson was in full-time employment in Dubuque, Iowa beginning July 10 2017, nor has the \$18,600 in purchase funds for the purchase of KYRN in June 2017 been refunded. Petitioner remains a party of interest in civil litigation against Edmondson in New Mexico's 7<sup>th</sup> Judicial District Court for breach of contract failing to follow FCC regulations and file the transfer application.

If after giving the applicant every possible doubt, the full-time employment in Dubuque Iowa beginning on July 10, 2017 with Emmaus Bible College, and no W-2 or 1099 for 2017 or 2018 for Socorro Community Radio would indicate that Edmondson had not hired a Station Manager but had transferred the station through a sale agreement and had left

the community of coverage without complying with the 'Home Studio' rule before it changed in October 2017 giving the licensee the 'changing circumstances the licensee was able to resume operations on March 1, 2019'<sup>1</sup>. No change in licensee behavior may be expected to address the civil concerns of licensee character and the blatant disregard for truthful communications with the Commission which have not been forthcoming since Steve Edmondson assumed the licensed in 2014 without lawful transfer, the commission must deny the renewal application and petitioner as a party of interest pleas for the involuntary transfer to Green Lion Media LLC..

## Summary

**Socorro Community Radio LLC** (SCR) dba Mine Country 102.1FM KYRN was publicly listed for sale in El Defensor Chieftain on April 27, 2017, after Steve Edmondson accepted a full-time position with Emmaus Bible College beginning on July 10<sup>th</sup>, 2017. Green Lion Media LLC. (GLM) responded to the sales notice and given an asking price within budget agreed to purchase the station and began live on-air broadcast with Steve Edmondson announcing the upcoming sale and transfer of the station. Edmondson presented 2014-2016 years of 1040 Schedule C tax records for the station and an FCC record search indicated he was 100% owner of the KYRN license. GLM the petitioner entered a contract with Steve Edmondson dba Socorro Community Radio LLC. For purchase of the 'Mine Country 102.1FM' radio station contingent upon acceptance of equipment, favorable financing and FCC approval of the license transfer on May 8<sup>th</sup>, 2017. On June 16<sup>th</sup>, 2017, Edmondson agreed to finance the sale of the station for a two-year

---

<sup>1</sup> Renewal File Number 0000148035-Dates and Explanation of Suspension of Operations for KYRN 102.1 under STA.docx

term with (GLM) and cooperated with T. Reese Janca KD7GSB GLM managing engineer in moving all studio equipment to the GLM's studio in the community of coverage before leaving the state for work in Iowa June 23<sup>rd</sup> 2017. All station account assets and liabilities began transfer to GLM in July 2017 including website domain, transmitter tower lease, station phone numbers and payroll. GLM's assumption was once the licensee was settled in Iowa from the move that Edmondson would file the license transfer application no later than August within 45 days required. When GLM requested Edmondson file the application for transfer with Commission in August for GLM to assume music license liabilities, Edmondson refused. The refusal to file the transfer application led to mediation in September and perpetual escalation of financial demands above agreements and using sale proceeds by Edmondson for music license fees in October. In October 2017 the FCC changed the home studio rule and Edmondson could operate remotely from Iowa, all GLM payments were current when Edmondson filed a complaint December 22, 2017. Licensee Steve Edmondson refused FCC Media Bureau Michael Wagner's advice to 'file a plain as vanilla' transfer application and with the full agreed upon sale price in Court escrow refused to comply with filing application on March 6<sup>th</sup>, 2018 and returning all sale proceeds until the application had been approved. Subsequently, Steve Edmondson falsified STA filings claiming the station stop broadcasting on March 2, 2018 knowing the station was broadcasting and cited 'unforeseen' circumstances as the reason. The Station is currently in the 7<sup>th</sup> Judicial District Court for case number D-725-CV-2017-000232 awaiting an answer for a counterclaim demanding specific performance from Edmondson to file the license transfer among other counts. Given the Case has persisted to the time of license renewal and Edmondson is not being truthful with the

Commissioners in all communications, GLM is filing a petition to deny the license based on unauthorized transfer of control and falsifying official communication with the Commission.

GLM perceives the initial assumptions about the lawful license transfer to Steve Edmondson in 2014 and being an individual knowledgeable and compliant in broadcast regulations having 3 years of operational experience were misleading and false. Researching non-disclosed reasons for Steve Edmondson's refusal to comply with regulations and have the purchase agreement reviewed by the Commission, GLM began researching the email communications and records received with the transferred control of the station and the FCC public records in August 2017. It became suspicious when learning of Bill Pace's studio lease in 2012, death in January 2013 and Tamara Pace's signature ending the Time Brokerage Agreement in 2014 but not on the 314-filing signed by Edmondson in January 2014. Tamara Pace introduced herself to GLM at a KYRN live remote broadcast December 4<sup>th</sup> 217 and through ensuing conversations and text revealed she didn't know Sovereign City Radio Services had transferred the license to Edmondson. Exhibits produced by Edmondson in preparation for trial in July 2019, revealed that the purchase agreement between Edmondson and Pace did not include the KYRN operational license; an unlawful transfer.

Socorro Community Radio LLC. was formed within the New Mexico Secretary of State by William H. Pace K5MXQ and began broadcasting locally in the City of Socorro in September 2012. The untimely and sudden death of William H. Pace on January 27, 2013 left full 100% membership in Socorro Community Radio LLC to his newlywed widow

retired Albuquerque school teacher Tamara Pace. Tamara Pace with no broadcast radio experience continued to operate KYRN from Albuquerque under the Time Brokerage Agreement with **Sovereign City Radio Services LLC.**, at a cost of \$2000 a month. A **47 CFR § 73.3541** - Application for involuntary assignment of license or transfer of control was not filed within 30 days of January 27, 2013, a requirement not known to Tamara Pace and one which local technical advisor did not advise her. Steve Edmondson was hired locally to Socorro to help generate local sales and help the radio station improve profitability on October 1<sup>st</sup> 2013. Tamara Pace entered a purchase agreement with Steve Edmondson for Socorro Community Radio LLC 100% membership on December 31, 2013 changing the controlling interest in the KYRN license without seeking the Commission's approval under a voluntary transfer 315 form. Edmondson assumes the license as an individual sole proprietor for the Socorro Community Radio LLC. 100% licensure when Sovereign City Radio Services submits the voluntary transfer 314 form. Edmondson retains William H. Pace's FRN for Socorro Community Radio LLC. The Public and Commission assume Steve Edmondson is the lawful transferee of KYRN with the consummation of the transfer.

Edmondson pays Pace 3% of the net station profits over 3 years for a total of \$1500. Edmondson with no technical background operating five-year-old equipment procured and commissioned by William Pace begins to experience more frequent equipment failures in 2016 and 2017. A transmitter failure in March 2017 not discovered by Edmondson for over 3 days is reported to him by James Stewart of Pace Audio in Albuquerque who built the station and with remote access checks operation on occasion but is not documented on the transmitter site or studio as the station's 'chief engineer'.

Edmondson decides to accept a job with Emmaus Bible College as a full-time athletic director on April 21st, 2017, placed the radio station for sale in the Socorro local paper El Defensor Chieftain, which is publicly published April 27, 2017, after accepting the job in Dubuque Iowa which begins July 10th, 2017.

**Green Lion Media LLC.(GLM)**, T. Reese Janca responds to the public solicitation selling Mine Country 102.1FM in the El Defensor Chieftain. Steve Edmondson gives a \$40,000 price if paid in full in 1-year for the station which GLM. Edmondson refuses \$40,000 on March 6<sup>th</sup> 2018 with the station broadcasting demanding \$5000 above the asking price or threatening to take the station off-air. The station was taken off-air on March 24<sup>th</sup> 2018 with a falsified STA filed by Edmondson on the 21<sup>st</sup> of March 2018. The station is currently in a lawsuit over breach of contract and refusal to transfer the license as required by regulation and contract. Public trust and faith in the station and service to the community has been harmed.

**Argument the initial 2014 consummated license transfer of the KYRN was indirect unlawful transfer through dubious means which should not be renewed.**

KYRN was unlawfully transferred to Steve Edmondson in January 2014 by the William H. Pace heir Tamara Pace sole member of Socorro Community Radio LLC., who failed to notify the FCC when William H. Pace (Bill Pace) died suddenly on January 27, 2013. SOVEREIGN CITY RADIO SERVICES, LLC contacted Steve Edmondson in December of 2013 at the local studio number in the City of Socorro to conclude the Time Brokerage Agreement (TBA) and transfer their 30% license interest to Socorro



Community Radio LLC., Tamara Pace did not reside in the community of coverage and Edmondson was acting as her station sales agent/manager starting October 1<sup>st</sup> 2013.

“On Oct. 1, Steve began working for Mine Country 102.1, At that time, it was not exactly locally owned, as the owner, Tammy Pace, lived out of the county, and commuted here part of the week to manage the station.”<sup>2</sup>

Tamara Pace being the sole member of Socorro Community Radio LLC., heir to William H. Pace 70% ownership was the required signatory in the publicly filed documents with the FCC commission which concluded the TBA but she did not file a Form 315 when transferring ownership of Socorro Community Radio LLC to Steve Edmondson. Tamara Pace on December 4<sup>th</sup>, 2017 still perceived the license was held by Sovereign City Radio Services, LLC., and was unaware the KYRN license was transferred to Edmondson.

“The license of KYRN 102.1 was transferred to Socorro Community Radio LLC in 2014. Socorro Community Radio LLC is a single member LLC owned by Steve Edmondson.”<sup>3</sup>

The December 30<sup>th</sup> 2013 Purchase Agreement between Tamara Pace sole heir of Socorro Community Radio LLC. and Steve Edmondson filed by Edmondson as an Exhibit List in State of New Mexico 7<sup>th</sup> Judicial District Court Socorro County Case D-725-CV-201700232, constitutes a sale of ‘the Buyer shall purchase all of the Membership Interest.’, which constitutes 70% ownership in the KYRN license which is not mentioned or called out in the agreement. The ‘full membership’ transfer without Commission approval of the transfer is indirectly an ‘unlawful license transfer’.

The remedy requested is to honor the party of interest Green Lion Media LLC., who purchased Socorro Community Radio LLC., with KYRN license on May 8<sup>th</sup> 2017 which

---

<sup>2</sup> El Defensor Chieftain April 27<sup>th</sup> 2017 - [http://www.dchieftain.com/news/socorro-radio-station-mine-country-for-sale/article\\_43e5471a-2aa3-11e7-ae09-43efd9df81c0.html](http://www.dchieftain.com/news/socorro-radio-station-mine-country-for-sale/article_43e5471a-2aa3-11e7-ae09-43efd9df81c0.html)

<sup>3</sup> Renewal Application File 0000148035 Explanation of Biennial Ownership Report Omission and Late Filing.docx

relied on the public license information which identified Edmondson as the lawful 100% owner of the KYRN with the capacity and intent to sell Socorro Community Radio LLC., with KYRN FM Broadcast doing business as 'Mine Country 102.1FM'.

**Argument in 2017 Edmondson committed an unauthorized transfer of control when placing the KYRN station for sale, closing the local studio and leaving the community of coverage.**

At the time the station was placed for sale in April 2017, the October 24<sup>th</sup>, 2017, Home Studio elimination rule change had not been enacted. Steve Edmondson began full-time work with Emmaus Bible College on July 10<sup>th</sup> 2017 in Dubuque Iowa after entering a contract to sell and finance the station sale over 2 years coming to term in 2019 and transferring physical control and station assets to Green Lion Media LLC. (GLM). GLM assumed all station assets and liabilities in July 2017 including transfer of radio station domain [www.minecountry1021.com](http://www.minecountry1021.com) , phone numbers, mailing addresses and the ability to hire and pay contractors in support of station services. GLM refused to accept programming license fees in August 2017 until Steve Edmondson acknowledged the sale of the station and filed the application for transfer with the Commission. After refusing \$25,000 (62.5%) of the station sale price in September to file the transfer application and using station sale proceeds to pay music license fees, Edmondson refused \$30,000 (75%) total payments in October to file the application of transfer with the Commission. GLM exasperated with trying to get the license to comply with regulations and honor the sale, contacted the Commission after placing the full sale price in Court escrow on February 14<sup>th</sup> 2018 and demanding the licensee file the transfer. Michael Wagner's response filed as an exhibit is when GLM became aware of the full impact of Steve Edmondson's refusal to file the license transfer application.

**Argument Edmonson’s character issues and falsified communications with the Commission should disqualify his license renewal application.**

Steve Edmondson dba Socorro Community Radio LLC. has violated 47 CFR 1.17 truthful and accurate statements to the Commission. The falsification of communications is documented through public filings with the Commission beginning with the Special Temporary Authority filing filed by Edmondson online March 20<sup>th</sup> 2018 claiming the station ‘**Date Station has gone / will go silent: 03/03/2018**’ knowing the station was still broadcasting and attending a March 6<sup>th</sup> 2018 negotiation meeting with GLM to accept full payment and file a 314 application to transfer the station. A court order was not issued against GLM to return equipment to Edmondson as given on August 14<sup>th</sup> 2018 STA. Steve Edmondson has falsified his ‘Public Inspection Files’ for the 3<sup>rd</sup> and 4<sup>th</sup> quarter of 2017 and 1<sup>st</sup> quarter of 2018 given he was not in New Mexico or operating the station and working full-time at Emmaus Bible College. Edmondson has falsified his renewal application denying that no violations by the licensee have taken place despite communications with former media bureau agent Michael Wagner on February 26<sup>th</sup> 2018.

<b>FCC Violations during the Preceding License Term</b>	Licensee certifies that, with respect to the station(s) for which renewal is requested, there have been no violations by the licensee of the Communications Act of 1934, as amended, or the rules or regulations of the Commission during the preceding license term. If "No", the licensee must submit an explanatory exhibit providing complete descriptions of all violations.	Yes
---	---	-----

Steven Edmondson perceives he is not required to communicate honestly with the Commission despite penalties clearly stated upon Commission forms.

.

## **Falsified Attachments to Renewal Application 0000148035**

### **Dates and Explanation of Suspension of Operations for KYRN 102.1 under STA.docx**

KYRN 102.1 Facility ID 164088 FRN 0022035885 under STA suspended operations on March 19, 2018 and continued that suspension of operation under STA granted by the FCC until March 1, 2019 when operations resumed.

The cause of the suspension of operation was because of unforeseen circumstances a planned change of ownership failed to materialize and to be in compliance with FCC regulations the station needed to be silenced until proper management and/or new ownership could be established.

Because of changing circumstances the licensee was able to resume operations on March 1, 2019.

#### **Petitioner Statement**

'Because of changing circumstances' -elimination of the home studio rule October 24<sup>th</sup> 2017 post sale and transfer of the station to GLM.

### **Explanation and Remedy for KYRN OPIF Issues.docx**

The OPIF is as complete as is possible. There are some quarterly reports from the Issues/Programs file that are not as complete as that might be due to files from 2012-2018 Quarter 1 being lost/destroyed. There is no real way to reconstruct these files except through memory and that leaves much to be desired. The person that was managing the files from July 2017 through March 2018 has either hidden or destroyed these files despite a court order that the files and other properties be returned. There are no files for 2nd Quarter of 2018 through the 4th Quarter of 2018 because the station was silent during that period. Many of the reports were filed late after the resumption of operations in March of 2019. There is no legitimate reason why these were filed late other than ignorance of datelines for these reports.

The Political Advertising reports were not filed in a timely manner due to a failure of the licensee to understand the filing deadlines.

#### **Petitioner Statement**

The licensee was in full time employment with Emmaus Bible College after selling and transferring the Station in July of 2017. During 3<sup>rd</sup> Quarter and 4<sup>th</sup> Quarter, local elections did take place and the Petitioner conducted candidate interviews, city council, mayor and school board forums among other locally focused programs.

## **Remedy**

The licensee is now more knowledgeable of the report deadlines and the requirements for each Quarterly Issues/Programs report as well as for Political Advertising reports and will strictly abide by the deadlines and requirements. The licensee will gladly follow any direction from the Commission that will help the licensee better understand the guidelines and requirements of these reports. The licensee understands the need for timely and accurate reports and will do everything with his power to make sure all requirements are fulfilled, and deadlines met going forward. As a small market station, the resources of the licensee are limited and prevent the licensee from being able to employ workers that specialize in such compliance issues. For that reason, the licensee request that the commission provide such small market licensees with specific guidance in the form of videos, podcasts, handbooks, etc. that are produced or written in a manner that is accessible to those that are not familiar with the legal jargon that often accompanies such requirements and deadlines. The licensee understands that there have been numerous missed deadlines and omissions and that the commission could well sanction these failures. However, none of these failures were due to attempt to mislead or gain any advantage and the licensee has tried to correct the issues to the extent that they are correctible. The licensee will also take any corrective measures that the Commission requires to make sure that such issues do occur in the future. The licensee is hopeful that the Commission will conclude that corrective, rather than punitive action is the best course in this situation.

## **Petitioner Statement**

“However, none of these failures were due to attempt to mislead or gain any advantage and the licensee has tried to correct the issues to the extent that they are correctible.”

Licensee falsifies information and hopes to take advantage of the elimination of the home studio rule and not notify the Commission the authentic reason the records are not available because he left the community of coverage before the elimination of the home studio rule and had wrongfully assumed transfer of the station in 2014. The station was operated under a TBA September 2012 to January 2014. On January 27 2013, William H. Pace K5MXQ died who was party to the TBA. Upon his death Tamara Pace a retired Albuquerque school teacher assumed operation from Albuquerque without any prior broadcast radio experience or supportive council which is why records are inferior during this time period.

## **Explanation of Biennial Ownership Report Omission and Late Filing.docx**

The license of KYRN 102.1 was transferred to Socorro Community Radio LLC in 2014. Socorro Community Radio LLC is a single member LLC owned by Steve Edmondson. Mr. Edmondson did not have a history in the radio business and the transfer of the license was shepherded through by Sovereign City Radio Services and its legal representative. Following the transfer of the license Mr. Edmondson did not received any education into the various reports and FCC requirements expected of the licensee and Mr. Edmondson did not have legal representation specializing in FCC law. As a result Mr. Edmondson failed to file the required reports in 2015, 2017, and filed the 2019 extremely late. There was no notification of these failures to the licensee. Fortunately, there were no changes in the ownership over that period. Of course, ignorance of the law is not an acceptable excuse for the failure to file the documents in a timely manner.

### **Remedy**

The licensee will set a calendar of required actions and filings required by FCC regulation and law. The licensee will gladly follow any guidance provided by the Commission to make sure that such omissions and tardiness of filings never happens again.

### **Petitioner Statement**

“Fortunately, there were no changes in the ownership over that period”

Edmondson continues in each statement to falsify information and communication with the Commission. Edmondson dba ‘Socorro Community Radio LLC., is in New Mexico’s 7<sup>th</sup> Judicial District having filed a complaint on December 22<sup>nd</sup> 2017 for ‘money due and repossession’ claiming a breach of contract by the Defendant for the sale and transfer of KRYN as publicly listed for sale on April 27<sup>th</sup> 2017 despite GLM being ready, willing and able to conclude the sale upon filing the application of the transfer and its consummation by the Commission.

## Conclusion

The only remedy which upholds the Communications Act is forfeiture of the license renewal to the part of interest represented as the petitioner GLM through an involuntary transfer of control. At every opportunity for the licensee to communicate honestly with the Commission who is governing a public asset represented by broadcast license channel intended to serve the public, Steve Edmondson has chosen with intention to falsify documents and statements with the Commission. Commission by evidence presented herein and within public information files submitted by Edmondson expect any change in character that has been consistently deceptive and false. GLM has been harmed assuming the transfer between Sovereign City Radio Services LLC and Socorro Community Radio LLC in January 2014 and consummated by the Commission was legitimate. Petitioner GLM who entered a contractual relationship with Steve Edmondson to purchase Socorro Community Radio LLC., doing business as Socorro Community Radio LLC., with KYRN broadcast license operated the station from July 1, 2017, through March 23<sup>rd</sup>, 2018. GLM which has an extensive counterclaim against Steve Edmondson dba Socorro Community Radio LLC., is asking for specific performance to transfer the license as recommended by former Media Bureau Chief Michael Wagner yet with COVID and a small rural district court a local legal remedy has not been speedily forthcoming and the public welfare and interest including tourism and business promotion have been damaged.

The remedy request for an involuntary transfer of the license to GLM is in the best interest of the community in the area of coverage where petitioner's local studio

continues to operate online providing local news, events, entertainment and live event coverage relevant reaching an audience over 3000 online.

WHEREFORE, for the above stated reasons, the Commission should deny the Application, or refer the matter for a hearing pursuant to Section 310(d).

Respectfully submitted,

/s Tom R. Janca

Green Lion Media LLC.  
Tom Reese Janca KD7GSB  
Executive Engineer



## Exhibits

- 1) Notice of Sale in El Defensor Chieftain –Exhibit1NoticeofSale\_ElDefensorChieftain
- 2) KYRN Sales Agreement May 8<sup>th</sup> -KYRNFinalPublicSaleDoc112017
- 3) Station Sale Finance Agreement –FinanceAgreement61617
- 4) Main Studio Agreement initiated by Bill Pace –MainStudio82812
- 5) FCC response to transfer assistance -22719FCC

## **Certificate of Mailing**

I certify that a copy of the forgoing was mailed/delivered/faxed 8/30/2021 to

Steve Edmondson dba Socorro Community Radio LLC.

P.O. Box 949

Socorro, NM 87801