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Petition to Deny of Green Lion Media LLC. Reply to Applicant Objections

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April 04, 2022

Opening Reply

The applicant's renewal has been challenged for thwarting the key responsibility of the FCC to fulfill its duty in serving the public interest, convenience and necessity through an ongoing falsification of information in communications with the FCC and by fraudulently transferring full control of an FM broadcast radio station. Applicant through intentionally not filing a Form 314 upon intention to transfer upon entering 'purchase agreement' and 'finance agreement' with the petitioner as required within 45 days after he accepted payments and terms for purchase on June 16, 2017, moved from his residential residence at 1408 Spring Street placing it for sale and left the community of coverage the week of June 26th, 2017. Applicant upon routinely being asked to file the application transfer by the petitioner as the licensee beginning in August 2017, demanded more money above the agreed amount each time and denied he sold the station. The applicant upon receiving full-payment on February 14th 2018 and advised to file the transfer on February 27th by Wagner, refused full-payment on March 6th 2018 and filed falsified STA [20180320AAQ](#) on March 21st 2018. Given the applicant's intentional failure to file the application for transfer as required with the FCC to make the KYRN 102.1FM radio station a legal agreement, the **purchase agreement** between the applicant and petitioner is **not enforceable** against the buyer in New Mexico state civil court. The Petitioner who has a real interest in license KYRN 102.1FM Facility ID 164088, remains willing and able to continue to serve the public interest, necessity and

convenience. The petitioner is seeking an involuntary transfer under form 316 upon a ruling of forfeiture against the applicant.

Letters of support gathered by the applicant indicate a local radio station and studio is important to central New Mexico communities within KYRN's coverage contour.

"If there is one of the most important things for community service down there (Socorro), it's high school sports, also, being able to provide services in the event of emergency, or to cover special situations."

Bill Pace K5MXQ General Class -El Defensor Chieftain 2010
Albuquerque, New Mexico Resident deceased 1/27/2013"

The importance of local radio within the coverage contour testifies to the applicant's lack of serving public interest and 'necessity, at minimum by falsifying an STA to go silent on March 21st, 2018, and the FCC reliance on truthful communications and approved the request based on false statements by the applicant. Notably reflected, in the City of Socorro's Mayor Ravi Bhasker's response and collective responses gathered by the applicant, is that KMXQ 92.9 FM a local station adjacent to petitioner's commercial property in Socorro is not mentioned at all as a secondary radio station serving public interest convenience or necessity. KMXQ despite licensure and broadcasting was not available to disseminate information within its coverage contour about the San Antonio or Belen, New Mexico flooding in 2018 or the regional urban fires and wildfires important to Deputy Fire Marshal Ken Wolf during the year KYRN was fraudulently taken off-air by the applicant. The absence of a locally operated radio studio and station places community members at a loss for quick daily dissemination of information with only a single newspaper published once a week. The appeal for an involuntary license transfer to the Petitioner would best serve the public interest,

necessity and convenience with a local radio station studio in operation since 2017 upon purchasing KYRN 102.1FM giving studio and field broadcast access to messaging of first responders, public safety and civic leaders within the community of coverage.



Image 1 December 4th, 2017, Socorro County Sheriff William Armijo makes a plea for winter blankets within the community of coverage during a live remote KYRN broadcast operated by Green Lion Media LLC..

Objector: Failure of the Petitioner to Meet Requirements

Petitioner Reply-(False)- failure of applicant to take responsibility to keep address current.

The renewal applicant has failed to keep the station's mailing address current since assuming station operation in January of 2014. In August of 2014, deceased Bill Pace was still receiving emails in August 2014 about the stations P.O. Box 949 renewal in Albuquerque. In January 2018 when the Registered Agent since 2012 suddenly resigned upon inquiry into the ownership of Socorro Community Radio LLC. (SCR), the address on file with the New Mexico Secretary of State (NMSOS) had not changed since the articles of incorporation were established on May 25, 2010, by Managing Member William H. Pace and Don Davis. On January 17th, 2018, a notice was mailed to the Registered Agent for SCR and on February 17th, 2018, NMSOS revoked SCR's Certification of Organization placing SCR in 'bad standing' with a Certification of Revocation.

Exhibit 1 SCR Address History

The renewal applicant has historically and consistently failed to update his mailing address with an accurate mailing address as required under '**CFR 47 Part 1 § 1.5**

Mailing address furnished by licensee'

Ensuring in matters regarding a broadcast license, where prompt delivery is important and given the uncertainty of the applicant's actual mailing address, I emailed Attorney Dean Border and his assistant Candice Beasley, his authorized legal agents along with

7th Judicial District Court, the notice of the Petition to Deny filing on September 1st, 2021, at 12:02pm.

Part 1 § 1.5 (b) ...some person authorized by him to act in his behalf.

Exhibit 2 -Service to Authorized Person

During recent communications with the FCC concerning the current matter applicant requested assistance to update radio station records in 2022 online. The applicant for renewal moved to Dubuque, Iowa the week of June 26th 2017 to a residence on Rockdale as indicated by his address on STA filing [20180320AAQ](#) which was never reflected in the applicant's public FCC records. On February 23rd, 2022, the applicant claimed to be residing again in Socorro, New Mexico in email communications with the FCC with a vehicle registered in Tennessee and a LinkedIn Professional Profile stating he lived in Murfreesboro, Tennessee on that date. A great deal of discrepancies exists between the applicant who is frequently known to travel back and forth from out of state into Socorro and what the studio address is which the applicant should not be allowed to use to avoid answering to the public and petitioner for his harmful actions under licensure.

The Petition to Deny was further cited in a Motion to Vacate the latest trial until the License renewal applicant outcome was known on September 13th, 2021, as a material and legal element of the contract between petitioner and applicant as recorded in the official Court docket.

The Petitioner has also been the recipient of numerous business correspondences and checks addressed and remitted to KYRN FM Green Lion Media since 2017 when

taking ownership of the P.O. Box 949 with the purchase of Mine Country and filing for a Change of P.O. Box ownership by August 1st, 2017.

Exhibit 3: Post Office Transfer Receipt

Applicant, being out-of-state party who has not kept the station licensee address current and accurate since January 2014, should not be granted dismissal of the Petition to Deny for a history of failure to keep the license and studio addresses current with the New Mexico Secretary of State as a business in the State of New Mexico, or with the FCC who is currently considering the application for license renewal for the next decade. The radio station mailing address, 'P.O. Box 949' was transferred to Green Lion Media with the sale of the station on July 6th, 2017, officially and formally filed on August 1st, 2017, by the Petitioner. In addition, the Petition to Deny was formally filed online on the License Management System and acknowledged as being received by the FCC by required deadline and served to an agent of the applicant as required and evidenced.

Argument 1

Objector – Response

Applicant's assertion of facts

*"What the petitioner fails to understand is **that there was no transfer of the KYRN license in January 2014 to Steve Edmondson. The license was fully under the control of Sovereign City Radio and the transfer of the license to Socorro Community Radio LLC was not until later in 2014 and the FCC was fully aware that Steve Edmondson was the sole member of Socorro Community Radio LLC.**"*

“The membership the status of Socorro Community Radio in January 2014 was relevant only to the TBA with Sovereign City Radio as there was no contemplation of a transfer of control of the license at that time.”

Petitioners Reply:

Is the applicant being truthful?

FCC reviewed the **Asset Purchase Agreement** entered into on January 7th-14th 2014 which is public record under the KYRN license filed January 31st, 2014, but did not review the ‘**Purchase Agreement**’ for the purchase of **Socorro Community Radio LLC.**, the week prior to entering **Asset Purchase Agreement** and assigning the TBA to Edmondson. Exhibit 4 contains the ‘Purchase Agreement’ between heiress Tamara Pace and Steve Edmondson as entered December 31, 2013.

Exhibit 4 SCR Purchase Agreement

December 30th ‘Purchase Agreement’ signed Tuesday December 31st, 2013

Socorro Community Radio LLC. sole membership inherited by Tamara Pace upon Bill Pace’s death on January 26th, 2013, purchased for 3% of future company profits with no description of the business nature, assets or liabilities by Mr. Edmondson on December 31st, 2013

- Socorro Community Radio sold with no mention of radio station license or Time Brokerage Agreement with Sovereign City Radio Services, LLC.
- No mention of assuming 5-year radio studio lease through October 2017 with First State Bank as required prior to home studio rule change
- No mention of the **Asset Purchase Agreement** being drafted or proposed
- No mention of KYRN 102.1FM
- No mention of Time Brokerage Agreement which was a financial obligation of \$2500 a month
- No mention of Time Brokerage Agreement being terminated once the transfer was filed

- No mention of studio and equipment to provide radio service which would be transferred through the purchase agreement

Applicant Edmondson was hired by Tamara Pace on October 1st as an hourly employee after being introduced to Tamara through George Funkhouser while Melissa Edmondson was working as an in-home physical therapist for Presbyterian Socorro General Hospital assigned to Rebecca Funkhouser “Becky” now deceased. The Edmondson’s acquired ownership as 100% membership of Socorro Community Radio (SCR) on December 31st at a time when Bill Pace’s interest in the KYRN license was 70% and Sovereign City Radio Services SCRS LLC. interest was 30%. No discussion of value, no projection of earnings, zero dollars exchanged, and Edmondson gained controlling ownership of the SCR obligated to SCRS under a TBA and 2-year contributory agreement with no cash or down payment exchanged. Records show Edmondson’s total payment to heiress Tamara Pace of 3% profits for 3 years amounted to \$1,500.00.

January 7th, 2014

Asset Purchase Agreement in January 2014 File Number/ID [20140131AMX](#), between Sovereign, Community and Edmondson contains an intent to file license transfer which upon filing; the Time Brokerage Agreement is terminated and considered of ‘no value’ for capital purposes.

Asset Purchase Agreement consists of 3 Exhibits

- Exhibit A -Existing TBA with William H. Pace ‘Bill’ in effect which is assumed by heir Tamara Pace on January 26th, 2013.
- Exhibit B -Contributing Agreement
- Exhibit C -Operating Agreement

Despite Edmondson entering an **Asset Purchase Agreement** with Sovereign on Tuesday, a week after applicant Edmondson assumed 100% ownership of Socorro Community Radio LLC. (**SCR**) on December 31st, 2013, 70% license interest remained with heiress Tamara Pace on January 7th, 2014, and the December 31st, 2013 **'Purchase Agreement'** was not included as an Appendix or Exhibit to the **Asset Purchase Agreement** for KYRN 102.1FM. Tamara Pace was still required to sign and transfer the TBA liability to Edmondson within Exhibit A. Heiress Tamara Pace a 70% of holder in the TBA on January 7th and her agreement with the applicant Edmondson which represents a significant change in SCR membership 70% of control is not a party to the **'Asset Purchase Agreement'** reviewed by the FCC. Tamara Pace is only part of Exhibit A of TBA where she is required to assign the financial encumbrance of the TBA agreement at \$2500 a month to Edmondson which appears as a financial relief to the heiress. Yet, the full **Asset Purchase Agreement** document describes the intention to transfer the license to Socorro Community Radio LLC. and **Schedule C 2. Termination of TBA** that the TBA will be terminated the date the license transfer is filed which occurred on January 31st, 2014.

When Tamara Pace contacted me on December 4th, 2017, at an AX Propane live remote event from her home in Albuquerque, she still thought Sovereign owned the license and Edmondson DBA Mine Country was under the TBA with Sovereign.

It is dubious that the **'Asset Purchase Agreement'** which was reviewed by the FCC upon filing the form 314, with 3 Exhibits didn't require Tamara Pace's signature on all agreement and exhibit signature pages or that no 315 was required when SCR

membership control changed by 100% which led to Steve Edmondson's 100% control of Sovereign and Community in the KYRN license.

Petitioner perceives it dubious that a purchase agreement between Steve Edmondson the week prior with William H. Pace's heiress for 100% membership in Socorro Community Radio LLC. wasn't included in the **Asset Purchase Agreement** which required Tamara Pace's signature to assign the TBA to Edmondson within the same agreement. Dubious because of the short time period between **Purchase Agreement** 12-31-2013 and **Asset Purchase Agreements** 01-07-2014 transactions and failure to disclose that Edmondson was not being encumbered with the \$2500 monthly TBA expense once the transfer application was filed.

- January 26th, 2014, One year anniversary of William H. Pace 'Bill' death.
- January 31st, 2014, Form FCC 314 to Transfer the License was completed with Steve Edmondson 100% controlling interest in KYRN 102.1FM.

Asset Purchase Agreement also falsifies Mr. Edmondson's qualifications in experience and knowledge of the market having just relocated from Tennessee to New Mexico within a year.

Edmondson is experienced in the construction, development, and operation of radio stations and is familiar with KYRN and the Socorro, New Mexico market.

Exhibit 5: Edmondson's Resumes

Petitioner's Conclusion to Applicants Objection

Applicant Mr. Edmondson has made false statements in his objection.

- ***“that there was no transfer of the KYRN license in January 2014 to Steve Edmondson.”***
- ***In January 2014.....as there was no contemplation of a transfer of control of the license at that time.”***

Applicant benefited from false statements within ‘**Asset Purchase Agreement**’ being a new resident to Community of coverage from Tennessee coaching girls’ basketball until relocating in 2013 and with **NO EXPERIENCE** in the construction, development and operation of radio stations prior to being hired by Albuquerque resident Tamara Pace on October 1st, 2013, as a City of Socorro local hourly sales and production assistant.

Argument 2

Unlawful Transfer of Control 310(d)

Objector – Response

“The petitioner states, ‘In 2017 Edmondson committed an unauthorized transfer of control...’ To this the applicant pleads guilty with ***extenuating circumstances that implicate the petitioner in misleading statements and material misrepresentation.***”

Petitioner will now demonstrate the intentional fraudulent transfer by the applicant to thwart the FCC’s responsibility to serve the public interest, necessity and convenience through false accusations, fabrications and intentional omissions by the applicant to

avoid penalties and enrich himself, and that **no** misleading statements or material misrepresentations were made by the petitioner.

The petitioner will demonstrate the applicant intends to benefit from breaching the sales contract by failing to file the transfer as required by law which renders the contract illegal and unenforceable against the buyer in New Mexico Civil Courts and the full Counterclaim is due. The applicant's fraudulent motivation in part emerges from the FCC 'Home Studio Rule' change on October 24, 2017 which no longer required a local studio which went in to effect in March of 2018. The 'rule change' known by the applicant was cited clearly in a March 25th 2018 email four days after falsifying the Special Temporary Authority [20180320AAQ](#) to go silent on March 21st 2018, claiming *'BECAUSE OF UNFORESEEN CIRCUMSTANCES A PLANNED CHANGE OF OWNERSHIP FAILED TO MATERIALIZE'*.

Exhibit 6: Deceitful Intentions -March 25th, 2018, Email

Petitioner fully tendered the balance towards the \$40,000 1-year sale price which was placed into court escrow February 14th, 2018, eight months after entering a 24-month finance agreement with the applicant. Applicant refused to file the application for license transfer as requested yet again and a meeting was called on March 6th, 2018, between the Petitioner and Applicant with attorneys present. The applicant preceded in that meeting to threaten to take the station off-air if he didn't receive an additional \$5,000 above the fully tendered amount in escrow directly against written advice of FCC Media Bureau agent Mr. Wagner that all funds should be returned to the buyer until the form 314 had been filed in a 'plain as vanilla' application. Applicant did willfully and

intentionally thwart the FCC advice and responsibility to public necessity, convenience and interest by failing to file the transfer application unless extortive demands were met.

The following is to clarify and produce evidence that the applicant who has admitted to fraudulent transfer is the responsible party who has intentionally put forth misleading statements and material misrepresentations to justify the unauthorized transfer he has pleaded guilty to in his filed objection.

Objector States

“In April 2017 the applicant accepted a job in Dubuque, Iowa to begin in July.”

Applicant accepted a full-time position at Emmaus Bible College in Dubuque, Iowa on April 21st, 2017. Applicant began seeking assistance from contacts on how to sell a radio station.

Exhibit 7: How to Sell the Station -April 21, 2017

The applicant had **80 days in total** to begin full-time work assuming at 8am on July 10th, 2017, in Iowa but was scheduled for a Bible Camp in Tennessee the week prior by his testimony and his last day in New Mexico was no later than Friday June 30th, 2017. On June 12th, 2017, the situation for the applicant was becoming desperate.

On Jun 12, 2017, at 03:09 PM, steve <steve@minecountry1021.com> wrote:

Doug,
With my impending move to Iowa the sale of the station is really quite urgent and I need to have things moving pretty quickly. I need to know what kind of time frame you are looking at in getting this process completed so that I can make some decisions on how to proceed. I not intending to make this a high pressure sales situation, but my situation is becoming urgent.

Thanks,

Steve Edmondson

Despite applicant announcing On-Air April 25th, 2017, that station was for sale it was the publication in the El Defensor Chieftain on April 27th, 2017, that informed the Petitioner working full-time at the National Radio Astronomy Observatory (NRAO) of the

opportunity and led to an immediate contact with Edmondson to learn the affordability of the KYRN 102.1FM station. On Saturday April 29th after meeting at the studio, we had reached an affordable price of \$41,000 given my solid employment and annual salary of \$61,000 plus benefits at NRAO as a Technical Specialist II.

April 29th, 2017, Petitioner statements

- ‘purchasing of radio station and license’
- ‘offer handling of the FCC transfer application’

April 30th, 2017, Petitioner statements

- ‘My task are funding and FCC application preparation’

Exhibit 8:–Offer to Sell -4/29-4/30

Applicant Objection -Unlawful Transfer -Objector is not responsible

Appendix – List of Petitioner’s Errors and Falsehoods

6) *“To my recollection Mr. Janca had not made mention of the 314 Form until the meeting on September 15, 2018, at a Socorro restaurant.”*

Petitioner Response: ***False accusation by applicant*** since the necessity and material element of the license transfer was discussed as a consideration of the sale since the origin of a sale price between the seller and buyer April 30th 2017, a contingency of the May 8th 2017 Purchase Agreement and a continual requirement by the ‘buyer’ to the ‘seller’ requiring the transfer be filed beginning in August 2017 before the music license liability would be assumed as the final financial liability of the station remaining to be assumed by the ‘buyer’ upon application to transfer KYRN license being filed.

The May 8th, 2017 'Purchase Agreement' which emerged from the April 29th and 30th 2017 exchanges communicated the terms of the purchase and included 3 sales contingencies.

Sale Agreement Contingencies

- 1) Transfer of station and sale price is contingent on inspection and satisfactory resolution of (site) audit findings
- 2) Transfer of station is contingent on securing favorable financing
- 3) Transfer is contingent upon FCC approval of the ownership transfer**

Exhibit 9: -Purchase Agreement -May 8th

Applicant knew the license transfer was necessary and had misconceptions of how radio stations are valued in the radio industry.

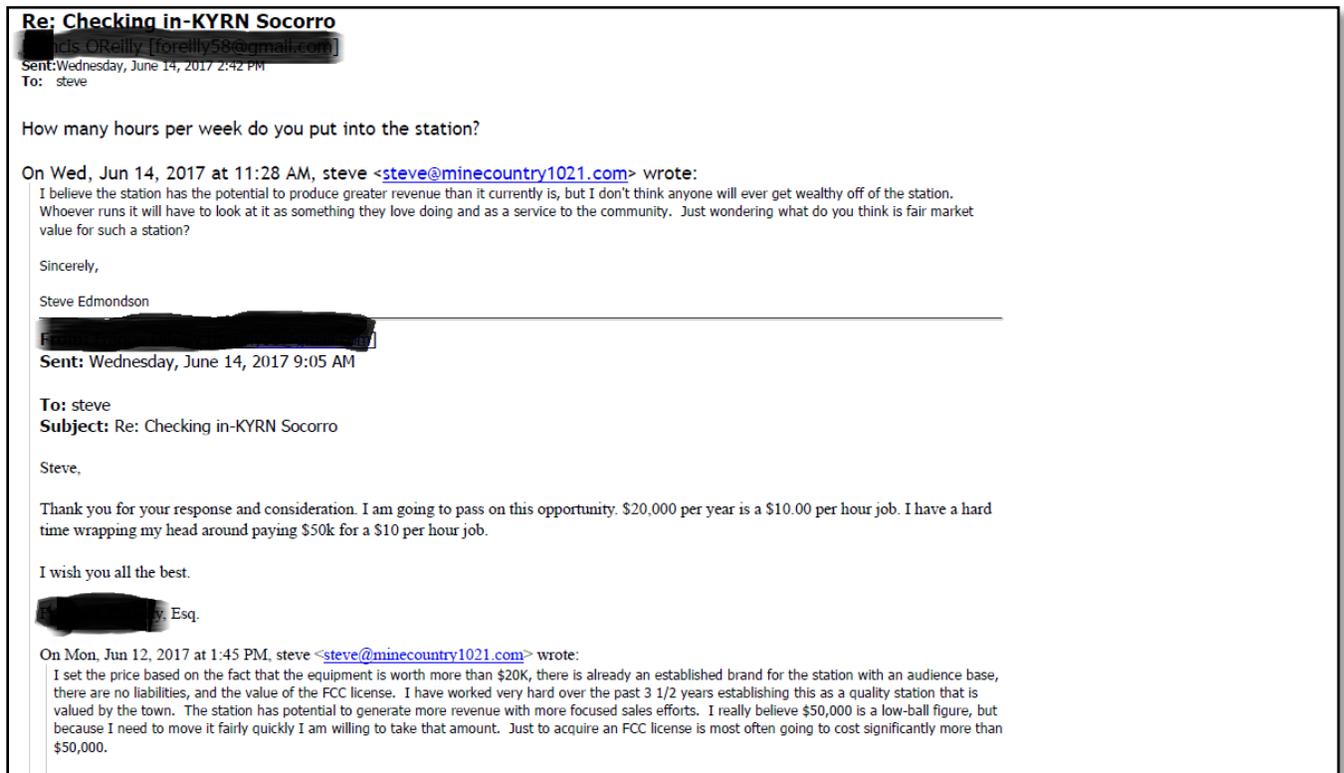


Image 2 www.minecountry1021.com owned by Petitioner with all associated domain communications as purchased and transferred in July of 2017

Objector States

“Mr. Janca notified the licensee that he was unable to obtain financing to secure the purchase and the agreement was abandoned.”

Petitioner Replies: Applicant again communicates falsely

May 23rd, 2017 “I will still honor that agreement if you get back to me before I make an agreement to sell to someone else” Mr. Edmondson

Exhibit 10: Original Agreement Honored -May 23rd, 2017

Exhibit 11: New Terms Agreed -July 6th, 2017

Applicant had found no other buyer in the ‘open market’ by June 16th, 2017. It was the Petitioner who contacted Mr. Edmondson given less than 30 days remained before he had to leave for Iowa and applicant had filed no notices of transfer or going silent with the FCC despite emptying his residence and listing it for sale at 1408 Spring Street, Socorro, NM. The May 8th, 2017, agreement spelled out the terms of the sale including transfer and the ‘owner finance’ agreement of June 16th, 2017, entered with the applicant was the financing contingency which only left the 3rd contingency for the seller to file the notice of transfer so it could be reviewed and approved by the FCC.

Exhibit 12: 1408 Spring Street for Sale

Applicant further falsifies his objection stating in November 2017 he contacted Michael Wagner, ‘*Mr. Wagner suggested instead the licensee go through local legal channels to have Mr. Janca forced from operation*’. Aside from any written evidence of

this exchange not being provided by the applicant, three historical records refute this blatant fabrication and falsification to claim such a statement.

- 1) Why would Media Bureau Assistant Chief Michael Wagner contradict his own written advice on February 27th, 2018, suggesting to the Petitioner in the exhibit already filed that the ‘buyer’ and ‘seller’ should ***work together*** to file the application of transfer and that the seller should refund all purchase monies until it was filed? It is in the best interest, necessity and convenience to the public that the licensed channel continues serving the community within the contour. Why wouldn’t Wagner advise the applicant that filing an STA to go silent was required to take the station off-air?
- 2) Why would the applicant have his attorney set a hearing on the 19th of March 2018 in a local court to take the radio station off-air and not file the purported statement with the Court? It is not in the New Mexico Courts jurisdiction to dictate operation of a broadcast license.
- 3) The applicant is clearly fabricating information given it was at the March 19th, 2018, hearing called by the applicant’s attorney to silence the station that the Petitioner informed the Court that the licensee would need to file an STA to go silent which had not been done to date.

Applicant states- ‘Petitioner misleading statements’—Is FALSE

Applicant admits the fraudulent transfer ‘with extenuating circumstances that implicate the petitioner in misleading statements’

Petitioner Response: Numerous false testimonies are given by applicant within the filed Objection with written records that the applicant is omitting facts and fabricating stories to justify his legal violations and further enrich himself.

Applicant states – ‘material misrepresentation of (Petitioner’s) finances was a primary cause of the KYRN license transfer issues’-- Is False.

“Apparently, Mr. Janca falsely represented his ability to obtain finances and he did not meet the financial standards required to obtain an FCC license.” Mr. Edmondson

Applicant Mr. Edmondson continues to make intentional false statements with full knowledge that the applicant had no intention of transferring the license beginning in October 2017 when learning of the ‘Home Studio Rule’ change and took the September ‘purchase agreement’ payment with memo **‘for radio station purchase’** and misappropriated it for the music license fees which were the obligation of the radio station as sold June 16th 2017 and awaiting his filing of the transfer application as required by law as petitioned for by the buyer since August 2017. Applicant is also fully aware of his refusal to transfer the license for \$25,000 paid balance in September 2017, \$30,000 paid balance in October 2017 and refusal of full \$40,000 sale price made good by a \$23,030.32 into the applicant’s attorney of record Mark Filosa’s Trust Account on February 13, 2018, four months prior to the balance being due in June 2018.

Exhibit 13 -Petitioner Payment History

The applicant’s refusal to file the transfer with full payment in escrow led to the email exchange between the Petitioner and FCC Audio Division Assistant Chief Michael Wagner. On March 6th, 2018, with the station still serving the public, a meeting was

held between the respective attorneys and parties to demand the license transfer given the FCC stipulations and urgency to file a 'plain as vanilla' 314 transfer application as quickly as possible by Mr. Wagner. As recorded audio and written statements by Petitioner's attorney Lee Deschamps present at the meeting give witness, the objecting applicant threatened to take the station off-air if he was not given an additional \$5000.00 to file the transfer.

Applicant

"His material misrepresentation of his finances was a primary cause of the KYRN license transfer issues."

Petitioner Response: FALSE -The applicant again misleads with untruthful communications that the Petitioner did not misrepresent his finances or capacity to purchase and operate the station, who did tender full price within 8 months of a 12-month term due in July 2018.

Argument 3 – Applicant's Response

The petitioner states: "Edmondson's character issues and falsified communications with the Commission should disqualify his license renewal." The petitioner brings as evidence the following:

Petitioner responds: Through Applicant's Argument 1 and Argument 2, a continual pattern of falsifying, fabricating and omitting records in communications and dealings by the applicant with the FCC has been demonstrated and evidenced beyond reasonable doubt. Argument 3 will again prove that the applicant is incapable of truthful communications even with the Special Temporary Authority with penalties of fines and/or imprisonment for falsifying communications which in this case removed vital broadcast radio services in the community of coverage during the 2018 flooding of San

Antonio and Belen communities within the licensed KYRN coverage contour. Applicant stated in his Special Temporary Authority file number **2008032018AAQ** the reason for requesting to go silent as, *'BECAUSE OF UNFORESEEN CIRCUMSTANCES A PLANNED CHANGE OF OWNERSHIP FAILED TO MATERIALIZE'*. The truthful reason the applicant refused Assistant Bureau Chief Wagner's advice to refund all sales proceeds received, file a 'plain as vanilla' transfer application and demanded \$5,000.00 more to comply with the law is stated clearly in the March 25th, 2018, email submitted by Mr. Edmondson in preparation for trial on July 24th, 2019, the change in the FCC home studio rule which would allow him to operate anywhere needing only an internet connection to connect to the leased transmitter site.

Exhibit 6: March 25th, 2018, Email

Mr. Edmondson falsified the dates the station was broadcasting impacting emergency alert services vital in the community of coverage and falsified the reason the station was taken off-air facing forfeiture, fines or imprisonment to do so as stated beneath the signatory block of the STA form to fulfill his own personal enrichment.

On March 12th, 2018, with the station still broadcasting and applicant refused to file the legally required transfer as stated previously, the Petitioner filed a Special Temporary Authority request for \$190.00 to continue serving the public interest, necessity and convenience while the local courts resolved the contractual ownership issues.

Exhibit 14: STA March 12th, 2018

Petitioner's Conclusion Reply

Applicant has demonstrated through historic and current communications and actions his intentional and willful aim to thwart the FCC duty and responsibility to serve the public interest, necessity and convenience through falsification of information seriously prejudicing public interest by fraudulently taking the station off-air to serve his own interest and enrichment. Applicant further has taken no responsibility for failing to file the lawfully required transfer and committing unlawful transfer violating section 310(d) of the Communications Act as admitted by Mr. Edmondson. Applicant has shown a dubious, deceitful and complete disregard for the public welfare by removing from community interest and emergency service necessity without justified cause KYRN 102.1FM from broadcast service to serve his own personal enrichment through filing falsified documents with the FCC and filing a fraudulent lawsuit on December 22, 2017, with no legal standing and unripe for judgement. If the objecting applicant has willfully and deceitfully harmed the Petitioner, intentionally breached a 'purchase agreement' for KYRN 102.1FM which made it illegal by the sellers intentional and deceptive actions to personally benefit creating a contract that is unenforceable against the buyer, can statements by the applicant about the petitioner be deemed to have any value when all other statements given in the objection have been false and the applicant has acted deceitful in the matter before the FCC to enrich himself and harm the public and petitioner while refusing any responsibility for his actions? No, sufficient evidence has been provided to prove the applicant's lack of integrity and willingness to do or say anything to get his way and Mr. Edmondson's renewal should be denied and the license forfeited.

Petitioner Request for Involuntary Transfer of KYRN 102.1FM

The Petitioner is an Honorably Discharged Army Veteran with Electronic Warfare military and civilian experience who has done nothing to thwart the silencing or operation of KYRN 102.1FM and has sought all legal means available to serve the public interest, necessity and convenience while attempting to be restored from the fraudulent and deceptive behavior of the applicant in the sale of KYRN 102.1FM in June of 2017. Petitioner holds an FCC General Radio-Telephone Operator license PG-GB-043360 (Part 13 since 1998) and an Amateur Extra Class license KD7GSB (Part 97 since 1999) and working professionally in Part 90 and Part 101 as a radio engineer and having left the National Radio Astronomy Observatory as a Technical Specialist in Intermediate Frequency Processors 2-18GHz with linear and non-linear(mixer) measurements and Active Hydrogen MASER oscillator expertise, to purchase and operate KYRN 102.1FM radio station with actual experience in the construction, development and operation of radio stations and technical systems and now completed a BS in Information Technology with an Advanced Degree in Cybersecurity with Honors while awaiting justice. Currently, KYRN 102.1FM audio is -6dB below adjacent channel levels and operating at less than 50% of its coverage contour under the applicant's operation. My professional career experience in radio and technology is without blemish, with many awards throughout my career and endorsements by my peers, clients and relationships.

Exhibit 15—Janca Resume

If the FCC agents who are reviewing this Petition to Deny should agree with my assertions that the applicant has gained the radio station through dubious means,

fraudulently transferred the station intentionally through failure to file the transfer and has falsified communications with the FCC, any one of which are grounds for Edmondson's forfeiture of licensure; I ask on behalf of the public interest, necessity and convenience that you consider my listeners and sponsors letter of support many of whom were earned in the initial 10 months of operating KYRN 102.1FM, while others who benefit and enjoy from our ongoing online local radio programs delighting national and international audiences.

Rio Grande Valley Radio thrives in a multi-cultural community and our programs feature native speaking DJs in English, Spanish and Navajo as I strive to produce a variety that embodies 'Mi radio es su radio where the West listens'. RGVR's political balance and openness to all qualified candidates during our first election season for Mayor and City Council members tipped the political scales in our community of coverage following the FCC directive for equal airtime. RGVR's technical abilities allowed us to broadcast the City Council forum directly from the County's public meeting room and to conduct the Mayor's Forum at Sarricino Middle School which allowed us to reach more than 10% of our population coverage in addition to in-person attendees. It was this media coverage which tipped the financial contribution influence in our community of coverage in favor of informed voters who had the opportunity to 'hear' and 'see' the qualified candidates seeking their vote and why RGVR with a local studio and remote capabilities invested in the community is vitally important to restore balance to influence and information in our community of coverage. Our local programs use personalities from our community like NM Tech with Dave Thomas's Science Saturday, working Cowboy Doug Figgs with Keepers of the West, Vocal with Val for interviewing

community leaders and covering local events, Pablo and Consuelo Lopez Spanish Speaking DJs for our Spanish hour and Jason Frame with Hozho (Beauty) a mental wellness and recovery program for community members dealing with addiction part of our long term partnership with Socorro County Option and Prevention Education (SCOPE) that began in 2017 and continues with our live video streaming coverage of important community events and issues.

As an experienced Radio Engineer, my goal is to be able to use my technical abilities to keep local radio in a rural community with 30% below the poverty line informed and entertained through free broadcast entertainment variety and balanced local news coverage. In the event of a wildfire, flood or other community emergency, KYRN's coverage spans 3 counties and can offer a valuable studio or live remote service for public safety and first responders to reach our often-remote residents like Sheriff William Armijo did from our live broadcast at a promotional business event in December of 2017. The technical ability to operate the radio station remotely or anywhere in the field allows RGVR the ability to bolster our small business, promote our local musicians and our studio's convenience off Highway 60 means that we are easy to find with a professional grade radio station studio.

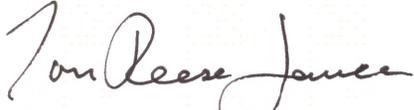
Exhibit 16 -RGVR Local Radio

I will never recover all the financial damage I have received in defending my purchasing interest in KYRN 102.1FM or the 4 years of lost income with \$18,569.68 paid to the applicant and ten months of operational labor and expenses still in local court awaiting a ruling to appeal on a multiple count counterclaim. My goal with a small rural community in decline at a sales price a little over \$2 a person in the coverage

contour was never motivated by wealth but the desire to serve my community and make a difference. Given over 1000 likes and 1200 followers through my radio stations Facebook pages and my ardent supporters who enjoy and fund my local interest programs which continue to stream online, I can connect my internet stream to an FM transmitter within short order to resume broadcasting. I continue through any technical and economic means possible to fulfill the public interest through local programs, necessity for local information and convenience of a professional radio studio in the City of Socorro with the ability to meet the public in the field to cover local sports, news, businesses and people using video streaming service in addition to a 24/7 online HD audio radio program stream. Please consider we already have KMXQ streaming music remotely with no active studio in Socorro. Albuquerque radio isn't serving the need of local coverage as identified in the gathered letters of support for KYRN 102.1FM. Our rural farming and ranching communities are not metropolitan or urban. When the 2018 fire and flood happened, we needed a local station that could go live quickly to inform the public with an active emergency alert system which is what RGVR can provide to our community of coverage. A vibrant local radio station conveniently in commercial space along the highway serving our diverse community interest from all walks of life, faiths, political affiliations and musical variety is what our community of coverage deserves. Please consider the Involuntary Transfer of KYRN 102.1FM to Rio Grande Valley Radio and Tom Reese Janca KD7GSB in the best interest, necessity and convenience of our community of coverage upon finding of forfeiture by the applicant.

Thank you for your consideration of the matter on behalf of our local community and Rio

Grande Valley Radio serving since 2017!



Tom R. Janca KD7GSB
Rio Grande Valley Radio
P.O. Box 949
Socorro, NM 87801

<p>... 2017, a Public arding an application urant (Beer & Wine) nse - On-Premise Only with Patio e held.</p> <p>Hotcoat Systems ba Sourdough Mine</p> <p>Address - 1221 e Socorro, NM</p>	<p>Stuteville to Levi Daniels Stuteville.</p> <p>Rachel L. Gonzales, Clerk of Court By: Stephanie Vega Deputy Court Clerk Submitted by: Madeline Dowd Stuteville Petitioner, pro se</p> <p>Published in El Defensor Chief- tain on Nov. 23 & 30, 2017</p>	<p>Spencer Petitioner, Published in El D tain on Nov. 23 & 3</p> <p>STATE OF NE COUNTY OF SEVENTH J DISTRICT</p> <p>IN RE: The Petitic Name of Deanna I</p> <p>No. D-728-C</p>
<p>...ense - 115 Abeyta ro, NM 87801</p> <p>...ion - Applicant is restaurant (Beer & License - On- umption Only with</p> <p>Director of the Al- ming Division has ry approval and it the Socorro City al approval in ac- Section 60-6B-4 quor Control Act.</p> <p>Defensor Chief- & 30, 2017</p>	<p>Legal Notice KYRN 102.1FM Ownership Change- Steve Edmondson has relocated residence and employ- ment outside the region of KYRN community of license as of June 20th 2017. KYRN physical assets and ultimate control over opera- tion and programming has been sold to T. Reese Janca a Socorro resident in the community of li- cense. Station has been running under Mr. Janca's control at his local station since June 20th 2017. This notice is in compli- ance with FCC license transfer- ence requirements.</p> <p>Published in El Defensor Chief- tain on Nov. 23 & 30, 2017</p>	<p>NOTI TAKE NOTICE ...ance with the pr 8-1 through § 1978, Deanna M apply to the Honc C. Murphy, Distri 7th District of th Mexico, at: 7th Court for the Co 200 Church S Socorro County, 87801 on the 5 c 2018, at 9:00 an lar term of the C thereafter as the heard, the matter for Change of Na Mae Spencer, a age of 14, from Spencer to Deann</p>
<p>V'T</p> <p>NEW MEXICO F SOCORRO JUDICIAL T COURT</p> <p>on for Change of Madeline Dowd</p> <p>5-CV-2017-202</p>	<p>STATE OF NEW MEXICO COUNTY OF CATRON SEVENTH JUDICIAL DISTRICT COURT</p> <p>IN RE: The Petition for Change of Name of Charles Lee Spencer</p> <p>No. D-728-CV-2017-00034</p> <p>NOTICE TAKE NOTICE that in accord- ance with the provisions of §40- 8-1 through §40-8-3, NMSA</p>	<p>Rachel L. Gonzale Clerk of Court Submitted by: Spencer Petitione</p> <p>Published in El tain on Nov. 23 &</p> <p>STATE OF NE COUNTY OF SEVENTH J DISTRICT</p>