

Public Version

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of)	
)	
Distribution of)	CONSOLIDATED DOCKET NO.
<u>Cable Royalty Funds</u>)	14-CRB-0010-CD/SD
)	(2010-2013)
In the Matter of)	
)	
Distribution of)	
<u>Satellite Royalty Funds</u>)	

**MULTIGROUP CLAIMANTS' REPLY IN SUPPORT OF
RESPONSE TO ORDER TO SHOW CAUSE**

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Attorneys for Multigroup Claimants

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TABLE OF CONTENTS

INTRODUCTION.....3

ARGUMENT.....3

A. REDACTED

1. [Redacted].....3

2. WSG’s “public information reports”.....4

3. Alfred Galaz’s bankruptcy petition.....5

B. The SDC misstates or omits significant facts about [Redacted]

1. *Alfred Galaz*.....6

2. *Ruth Galaz*.....6

3. [Redacted]

4. [Redacted]

5. *Raul Galaz*.....8

C. The SDC allege “forged” signatures, even when no “signatures” exist.....9

1. *Alfred Galaz signature*.....9

2. [Redacted]

D. No issue exists that Worldwide Subsidy Group, LLC dba Multigroup Claimants possesses the authority to collect funds on behalf of the copyright owners that Multigroup Claimants has claimed to represent. Multigroup Claimants has engaged in no “deception”, nor had any plausible reason to do so.....9

E. Publicly-reported transactions involving real property previously acquired and mortgaged by Worldwide Subsidy Group LLC, and other transactions, have zero relevance to this proceeding, and are falsely represented by the SDC as “replete with fraud”, “fraudulent conveyances”, and “embezzlement of claimant funds”. . 12

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INTRODUCTION

In its “further briefing” the Settling Devotional Claimants (“SDC”) include an appendix of thirty documents comprising 721 pages, and no fewer than five original declarations authored by SDC personnel. As is immediately apparent, the SDC address subjects far beyond the topics addressed in either the Judges' order, fail to respond to the issues and facts set forth in Multigroup Claimants' filing, and with rare exception, none of the appendix documents appeared as part of the SDC's *Motion for Order to Show Cause* (filed December 26, 2020).

Multigroup Claimants avers that the vast bulk of the SDC's arguments and documents are facially irrelevant, and were included for purposes other than addressing the issues addressed in either the Judges' *Order to Show Cause* or Multigroup Claimants' filing. Coupled with the SDC's misrepresentations about their content and significance, they do not provide any basis on which to “disqualify” Multigroup Claimants as the recipient of royalties in this proceeding.

A. REDACTED

1.

REDACTED

Such

declarations are now modified to apply specifically to this pleading and authenticate the

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signatures therein. As noted, the respective declarants' interests therein are perfectly corroborated by federal tax returns filed by such persons and WSG from 2017 and forward.¹

REDACTED

2. WSG's "public information reports". As set forth in significantly greater detail in

prepared by WSG's certified tax professional (not WSG personnel), and are typically *not even shared with WSG personnel*. This fact is clear from the face of those reports. **Decls. of Wesley Crowley; Raul Galaz.**

As regards the 2017 report, former owner Denise Vernon erringly executed it even though she was no longer a member of WSG. Ms. Vernon executed the document when it was presented to her by WSG's accountant in 2017, believing that it applied to her 2016 membership interest, as were all other documents she was being requested to execute in connection with WSG's 2016 tax return. **Decls. of Denise Vernon; Raul Galaz.**

In 2018, WSG engaged a new tax professional (Wesley Crowley, CPA) to prepare its federal tax returns. During such engagement, Mr. Crowley filed both the 2018 and 2019 public

REDACTED

¹ If necessary, all such individuals will agree to an *in camera* inspection of redacted copies of such tax returns by the Judges in order to establish such fact.

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REDACTED

Alfred Galaz as the party submitting the report, even though Alfred Galaz (nor any WSG representative) had ever seen the report, while the 2019 report reflects that Wesley Crowley is submitting the report. Again, all the foregoing is confirmed by Mr. Crowley and all WSG representatives. Id.

3. *Alfred Galaz's bankruptcy petition.* Multigroup Claimants has already informed the Judges that no principal or representative of Multigroup Claimants had been aware of Alfred Galaz's bankruptcy petition until it was brought to their attention at least six months following

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Alfred Galaz revisited the subject following the undersigned's notification of such error, and was informed by his bankruptcy legal counsel that because there would be no consequence upon the merits of his bankruptcy filing, counsel considered amendment unnecessary. **Decls. of Alfred Galaz; Raul Galaz.**

REDACTED

B. The SDC misstates or omits significant facts [Redacted]

Alfred Galaz.

REDACTED

He further clarified that there was no need to identify "Multigroup Claimants" in his bankruptcy petition, as it was never assigned an Employer Identification Number (a prerequisite), and now further observes that he never identified Multigroup Claimants as a separate entity in his federal tax returns. **SDC App. At 133-134; Decl. of Alfred Galaz.**

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REDACTED

publicly-filed

documents relating to WSG, the SDC conspicuously omit that Ruth Galaz has been engaged as WSG's agent for service of process since April 2015 (by Denise Vernon), and remains in that capacity at this time. **Exhibit 1.**

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2

Raul Galaz. The SDC falsely assert that Raul Galaz was “caught” backdating an agreement, citing to SDC App. 386, 451. As that citation reflects, however, Raul Galaz *volunteered* that the agreement was a re-creation of a prior document, not for any purpose of deception (the later execution was revealed), but to document the parties’ agreement after the original document was lost by both. In fact, the claims of IWV Media Group were sustained based on other evidence. *Id.* Elsewhere, and literally based on nothing, the SDC assert that Raul Galaz has a “history of falsifying signatures”, despite no such evidence.

2 The SDC refer the Judges to two documents ostensibly executed by Raul Galaz

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C. The SDC allege “forged” signatures, even when no “signatures” exist.

Alfred Galaz signature. The SDC have repeatedly referred to Alfred Galaz’s typewritten name on the 2018 public information report, as “Al Galaz’s signature”, and now postulate based on Alfred’s “carefully chosen language” that Raul Galaz “forged” that typewritten text. SDC opp. at 9-10. This bizarre speculation based on nothing is refuted by five declarations, including that of WSG’s accountant (Wesley Crowley) who acknowledges preparing the 2018 report; no WSG representative ever saw such document. **Decls. of Wesley Crowley, Alfred Galaz, Ruth Galaz, Raul Galaz** [Redacted]

REDACTED

D. No issue exists that Worldwide Subsidy Group, LLC dba Multigroup Claimants possesses the authority to collect funds on behalf of the copyright owners that Multigroup Claimants has claimed to represent. Multigroup Claimants has engaged in no “deception”, nor had any plausible reason to do so.

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Consequently, the SDC accuse Multigroup Claimants of deception as to a matter for which it has no plausible reason to be deceptive, for which it does not even postulate a plausible reason,

3 *Ruling and Order Regarding Objection to Cable and Satellite Claims*, at 9.

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Literally no basis exists to argue that Multigroup Claimants is not entitled to receive the already-awarded royalties from this proceeding.

Finally, while the SDC allege Multigroup Claimants' "repeated" acts of "deception", it cites to literally none.

REDACTED

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E. Publicly-reported transactions involving real property previously acquired and mortgaged by Worldwide Subsidy Group LLC, and other transactions, have zero relevance to this proceeding, and are falsely represented by the SDC as “replete with fraud”, “fraudulent conveyances”, and “embezzlement of claimant funds”.

In the allotted briefing limits, Multigroup Claimants cannot possibly begin to address the full extent of irrelevance and inaccuracy of the SDC’s section V arguments speculating on WSG’s income, assets, and liabilities since its inception in 1998.

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Of course, the SDC do not identify *any* creditors of WSG. Of course, the creditors of Raul Galaz and Alfred Galaz are not creditors of WSG. Of course, the SDC can identify only a single instance – in 22 years – that any WSG client has asserted (unreasonably) that it did not receive the royalties it was due, which position was thoroughly addressed by the Judges and denied.

Decl. of Raul Galaz. Further, while the SDC cannot possibly begin to estimate WSG’s income from public records, it conveniently excludes public records that would contradict its contention. See, e.g., **Exhibit 3** (WSG judgment for \$1,018,249). The SDC are also firsthand aware of settlements between WSG and SDC members, the existence of WSG settlements with other entities (e.g., MPAA), yet mentions *none* of this. And while the SDC indicates that “[WSG] may have received some amounts for copyright royalty claims in Canada or elsewhere in the world”, it acknowledges that it has no idea what those amounts may be. In fact, WSG collects royalties worldwide, and has accounted to its clients for *hundreds* of collections from

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sources unidentified by the SDC. [Redacted] The SDC's ignorance as to WSG's income, assets, and liabilities, and operations, is profound and comprehensive.

Nevertheless, the SDC now set their sights on Ryan Galaz and a company he formed in 2016, RTG, LLC, and to the shame of every person contributing to the SDC brief, publicly accuse him as a participant in transactions "replete with indications of fraud" "fraudulent conveyances", and "embezzlement of funds", all for transactions which reflect nothing of the sort. The SDC do not engage in this shameless exercise and new round of accusations to protect the public or WSG-represented claimants, but rather as a pedestal to besmirch, in what has clearly become a personal matter to the SDC and its counsel.

Respectfully submitted,

March 22, 2020

_____/s/_____
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Telephone: (424) 293-0113
Email: brianb@ix.netcom.com

Attorneys for Multigroup Claimants

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd of March, 2020, a copy of the foregoing was filed with the eCRB system, and therefore sent by electronic mail to the parties listed on the attached Service List.

_____/s/_____
Brian D. Boydston, Esq.

National Association of Broadcasters (NAB) aka CTV, represented by John Stewart, served via Electronic Service at jstewart@crowell.com.

MPAA-Represented Program Suppliers (MPAA), represented by Lucy H Plovnick, served via Electronic Service at lh@msk.com.

Canadian Claimants Group, represented by Victor J Cosentino, served via Electronic Service at victor.cosentino@larsongaston.com.

SESAC Performing Rights, LLC, represented by John C. Beiter, served via Electronic Service at john@beiterlaw.com.

Public Television Claimants (PTC), represented by Ronald G. Dove Jr., served via Electronic Service at rdove@cov.com

Joint Sports Claimants (JSC), represented by Ritchie T. Thomas, served via Electronic Service at ritchie.thomas@squirepb.com.

Settling Devotional Claimants (SDC), represented by Matthew MacLean, served via Electronic Service at matthew.maclean@pillsburylaw.com.

EXHIBIT 1

Form 401
(Revised 05/11)

This space reserved for office use.

Submit in duplicate to:
Secretary of State
P.O. Box 13697
Austin, TX 78711-3697
512 463-5555
FAX: 512/463-5709
Filing Fee: See instructions



Statement of Change of
Registered Office/Agent

FILED
In the Office of the
Secretary of State of Texas
APR 14 2015
Corporations Section

Entity Information

1. The name of the entity is:

Worldwide Subsidy Group, LLC

State the name of the entity as currently shown in the records of the secretary of state.

2. The file number issued to the filing entity by the secretary of state is: 0704877122

3. The name of the registered agent as currently shown on the records of the secretary of state is:

Shantell Sloan

Registered Agent Name

The address of the registered office as currently shown on the records of the secretary of state is:

2667 Rim Oak, San Antonio TX 78232
Street Address City State Zip Code

Change to Registered Agent/Registered Office

4. The certificate of formation or registration is modified to change the registered agent and/or office of the filing entity as follows:

Registered Agent Change

(Complete either A or B, but not both. Also complete C if the address has changed.)

A. The new registered agent is an organization (cannot be entity named above) by the name of:

OR

B. The new registered agent is an individual resident of the state whose name is:

Ruth GALAZ
First Name M.I. Last Name Suffix

Registered Office Change

C. The business address of the registered agent and the registered office address is changed to:

132 Perry Ct. San Antonio TX 78209
Street Address (No P.O. Box) City State Zip Code

The street address of the registered office as stated in this instrument is the same as the registered agent's business address.

RECEIVED

Form 401 APR 14 2015

Secretary of State

Statement of Approval

The change specified in this statement has been authorized by the entity in the manner required by the BOC or in the manner required by the law governing the filing entity, as applicable.

Effectiveness of Filing (Select either A, B, or C.)

- A. This document becomes effective when the document is filed by the secretary of state.
- B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is: _____
- C. This document takes effect upon the occurrence of a future event or fact, other than the passage of time. The 90th day after the date of signing is: _____

The following event or fact will cause the document to take effect in the manner described below:

Execution

The undersigned affirms that the person designated as registered agent has consented to the appointment. The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized to execute the filing instrument.

Date: 4/9/2015



Signature of authorized person

Denise G. Vernon

Printed or typed name of authorized person (see instructions)

EXHIBIT 2

[REDACTED]

EXHIBIT 3

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

FEB 05 2010

John A. Clarke, Executive Officer/Clerk
By Daisy Beltran Deputy

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR COUNTY OF LOS ANGELES, CENTRAL DISTRICT

WORLDWIDE SUBSIDY GROUP, LLC a
California Limited Liability Company,

Plaintiff,

v.

CORDAY PRODUCTIONS, INC. a business
entity of unknown origin, and DOES 1
through 10, inclusive,

Defendants.

And Related Cross Action

CASE NO. BC382633
JUDGMENT (Proposed)

This action came on regularly for trial on April 22, 2009, in Department 32 of the Court, the Honorable Mary H. Strobel, Judge, presiding. Plaintiff Worldwide Subsidy Group, Inc. ("WSG") appeared through his attorney, Pick & Boydston, LLP, by Brian D. Boydston, defendant Corday Productions, Inc. ("Corday") appeared through its attorneys Berger Kahn, by Michael J. Aiken and Arthur Grebow. The parties stipulated to bifurcate trial with a jury deciding liability and the Court deciding damages.

On April 29, 2009, the jury found for WSG on the action and cross-action. On June 8 and 9, 2009, damages were tried to the Court. Thereafter, post trial briefs were submitted to the Court. On September 14, 2009, the Court issued a Proposed Statement of Decision. Thereafter, the parties

1 submitted proposed objections thereto and briefed issues regarding an award of pre-judgment interest.
2 The Court held hearings regarding said objections and the issue of pre-judgment interest on October 30,
3 2009 and December 4, 2009.

4 On December 17, 2009, the Court issued its Final Statement of Decision in which it awarded
5 WSG damages of \$1,018,249 against Corday.

6
7 NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED BY THIS COURT as
8 follows:

9 That Plaintiff Worldwide Subsidy Group, Inc. have and recover from Defendant Corday
10 Productions, Inc. \$1,018,249, with interest thereon at the rate of ten percent (10%) per annum from the
11 date of entry of this judgment until paid.

12
13 DATED: 2-5-10

14 
15 **MARY STROBEL**
16 _____
17 Judge of the Superior Court

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Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of)	
)	
Distribution of)	CONSOLIDATED DOCKET NO.
<u>Cable Royalty Funds</u>)	14-CRB-0010-CD/SD
)	(2010-2013)
In the Matter of)	
)	
Distribution of)	
<u>Satellite Royalty Funds</u>)	

**WESLEY CROWLEY DECLARATION IN SUPPORT OF
MULTIGROUP CLAIMANTS’ OPPOSITION TO SETTLING
DEVOTIONAL CLAIMANTS’ MOTION TO DE-DESIGNATE
RESTRICTED MATERIALS.**

I, WESLEY CROWLEY, declare and state as follows:

1. I submit this declaration in support of Multigroup Claimants’ *Opposition to Settling Devotional Claimants’ Motion to De-Designate Restricted Materials*. The following facts are within my personal knowledge, and if called upon I could and would testify competently thereto.

2. Texas public information reports are filed with the Texas Franchise Tax Board. They are typically prepared at the time of federal tax return preparation for the prior calendar year, but are prepared for the existing year, i.e.,

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not for the year for which taxes are being prepared. For example, in the preparation of 2016 federal tax returns, public information reports are prepared and filed in 2017. This often leads to confusion to laypersons as to the appropriate persons to be identified on such reports when there has been a change of owners or personnel.

3. In the case of Worldwide Subsidy Group, LLC (“WSG”), I was first engaged by it to prepare its federal tax returns for calendar year 2017, and was engaged on or about March 26, 2018. At such time, I was provided, *inter alia*, the 2016 federal tax return.

REDACTED

4. As is customary, I filed the 2018 public information report for WSG with the Texas Franchise Tax Board.

REDACTED

I have no record of having provided WSG or any representative thereof a copy of such 2018 report, nor any recollection of having provided a copy thereof to WSG or any representative.

5. REDACTED

6. As is customary, I filed the 2019 public information report for WSG with the Texas Franchise Tax Board.

REDACTED

I have no record of having provided WSG or any representative thereof a copy of such 2019 report, nor any recollection of having provided a copy thereof to WSG or any representative.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 17th day of March, 2020.

_____/s/_____
Wesley Crowley

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**[Redacted] DECLARATION IN SUPPORT OF
MULTIGROUP CLAIMANTS' REPLY IN SUPPORT
OF RESPONSE TO ORDER TO SHOW CAUSE**

[Redacted] :

1. I submit this declaration in support of Multigroup Claimants' *Opposition to Settling Devotional Claimants' Motion to De-Designate Restricted Materials*. The following facts are within my personal knowledge, and if called upon I could and would testify competently thereto.

2.

REDACTED

REDACTED

3. In 2018, WSG engaged a new tax professional (Wesley Crowley, CPA) to prepare its 2017 federal tax returns. During the preparation of 2017

returns (in 2018),

4.

REDACTED

5. I

REDACTED

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**DENISE VERNON DECLARATION IN SUPPORT OF
MULTIGROUP CLAIMANTS’ REPLY IN SUPPORT OF
RESPONSE TO ORDER TO SHOW CAUSE**

I, DENISE VERNON, declare and state as follows:

1. I submit this declaration in support of Multigroup Claimants’ *Reply In Support of Response to Order to Show Cause*. The following facts are within my personal knowledge, and if called upon I could and would testify competently thereto.

2. I hereby confirm and authenticate my signature

REDACTED

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3.

REDACTED

4.

REDACTED

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 21st day of March, 2020, at Chickasha, Oklahoma.

_____/s/_____
Denise Vernon

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Distribution of)	
<u>Satellite Royalty Funds</u>)	

**ALFRED GALAZ DECLARATION IN SUPPORT OF
MULTIGROUP CLAIMANTS' REPLY IN SUPPORT
OF RESPONSE TO ORDER TO SHOW CAUSE**

I, ALFRED GALAZ, declare and state as follows:

1. I submit this declaration in support of Multigroup Claimants' *Reply In Support of Response to Order to Show Cause*. The following facts are within my personal knowledge, and if called upon I could and would testify competently thereto.

2.

REDACTED

3. I have never been identified as either a “partner” or “director” of WSG, and am informed that no such designation even exists for limited liability companies.

REDACTED

4.

REDACTED

5. As has now been publicized by the SDC, in May 2019 I filed for bankruptcy protection. Inadvertently, my bankruptcy petition erringly indicated

REDACTED

6.

REDACTED

REDACTED

6. Until the public revelation of my bankruptcy filing, I had not discussed the matter with any WSG representative,

REDACTED

7.

REDACTED

8.

REDACTED

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 22nd day of March, 2020, at Tulsa, Oklahoma.

_____/s/_____
Alfred Galaz

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**RUTH GALAZ DECLARATION IN SUPPORT OF
MULTIGROUP CLAIMANTS' REPLY IN SUPPORT
OF RESPONSE TO ORDER TO SHOW CAUSE**

I, RUTH GALAZ, declare and state as follows:

1. I submit this declaration in support of Multigroup Claimants' *Reply In Support of Response to Order to Show Cause*. The following facts are within my personal knowledge, and if called upon I could and would testify competently thereto.

2.

REDACTED

REDACTED

3. I have never been identified as either a “partner” or “director” of WSG, and am informed that no such designation even exists for limited liability companies.

REDACTED

4.

REDACTED

5. I have been formally engaged as WSG’s agent for service of process since April 2015, and remain in that capacity at this time.

6.

REDACTED

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 22nd day of March, 2020, at San Antonio, Texas.

_____/s/_____
Ruth Galaz

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**RAUL GALAZ DECLARATION IN SUPPORT OF
MULTIGROUP CLAIMANTS' REPLY IN SUPPORT
OF RESPONSE TO ORDER TO SHOW CAUSE**

I, RAUL GALAZ, declare and state as follows:

1. I submit this declaration in support of Multigroup Claimants'

*Opposition to Settling Devotional Claimants' Motion to De-Designate Restricted
Materials.* The following facts are within my personal knowledge, and if called
upon I could and would testify competently thereto.

2.

REDACTED

REDACTED

3.

REDACTED

4. In 2018, WSG engaged a new tax professional (Wesley Crowley, CPA) to prepare its 2017 federal tax returns.

REDACTED

REDACTED

5.

REDACTED

6.

REDACTED

7.

REDACTED

8. In May 2019, Alfred Galaz filed for bankruptcy protection.

REDACTED

9. Multigroup Claimants is an assumed business name of Worldwide Subsidy Group, LLC. WSG has been in existence for 22 years, since 1998. In the course of that existence, not one WSG-represented claimant has ever filed suit against WSG. In fact, despite having to file suit against four former clients, none ever filed a counterclaim against WSG. To my knowledge, only two parties in 22 years have ever expressed discontent with WSG, and the judges are aware of both instances.

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10. The first instance occurred in 2005, when counsel for two WSG-represented claimants wrote an email to WSG and multiple SDC representatives, prompted by misinformation provided by the current SDC counsel. Specifically, according to Mr. David Joe (counsel to Kenneth Copeland Ministries and Benny Hinn Ministries), Barry Gottfried of the law firm Pillsbury, Winthrop, et al. (or its predecessor), secretly contacted Mr. Joe, revealed the contents of a confidential settlement agreement with WSG, then led Mr. Joe to believe that WSG had failed to account for the funds due to one of his clients. That information was incorrect, was quickly revealed as such, and Mr. Joe's clients have remained clients of WSG since 1998. At such time, WSG considered filing an action for defamation and breach of contract against Mr. Gottfried, his law firm, and his represented client Christian Broadcasting Network, but ultimately resolved to ignore the actionable conduct.

11. The second instance occurred in connection with claims asserted for non-commercial broadcasts of programming owned by Bob Ross, Inc. Under the mutual misimpression that the last of several agreements between WSG and Bob Ross, Inc. granted WSG continuing authority to seek retransmission royalties on its behalf, WSG made claim, and accounted to Bob Ross, Inc. over the course of several years. After discovering the mutual error, Bob Ross, Inc. (who was

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represented by counsel to an SDC member) demanded that WSG return to Bob Ross, Inc. the commission amounts that had been retained by WSG. WSG informed Bob Ross, Inc. that it would not do so unless all of the collected royalties were returned to PBS, the payor. That is, if Bob Ross, Inc. theorized that WSG did not have the requisite authority to make the claims from which royalties were generated, then Bob Ross, Inc. was similarly obligated to forfeit any collected monies. Bob Ross, Inc. refused.

12. WSG has had six prior owners or co-owners that are no longer owners, and not once in 22 years has the identity of WSG's owners been raised as an issue – until now, by the SDC, whom has no contractual relationship with WSG.

13.

REDACTED

14.

REDACTED

REDACTED

15.

REDACTED

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 22nd day of March, 2020.

_____/s/_____
Raul Galaz

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**BRIAN BOYDSTON DECLARATION IN SUPPORT OF
MULTIGROUP CLAIMANTS' REPLY IN SUPPORT
OF RESPONSE TO ORDER TO SHOW CAUSE**

I, Brian Boydston, declare:

1. I am over 18 years of age and an attorney at law duly licensed to practice law in the California. I am a partner in the law firm of Pick & Boydston, LLP, attorneys of record for Multigroup Claimants in this proceeding.

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3.

REDACTED

4. The SDC is comprised of almost twenty (20) entities in this proceeding alone, and has repeatedly informed the Judges that it is not a singular entity, but multiple entities, *each* an active participant in the allocation and distribution proceedings. Nonetheless, over the course of two decades, during which I have been counsel in the proceedings the vast majority of which, on not one occasion has the SDC ever notified IPG, Multigroup Claimants, or *any* adversary, of either the identity of the participants' ownership, or that there has been a change of ownership, for any of its participant entities.

5. In this very proceeding the SDC affirmatively challenged Multigroup Claimants' request for such ownership information, *and prevailed*. See *Order Granting in Part and Denying in Part*

Public Version

Multigroup Claimants' Motion to Compel Production by Settling Devotional Claimants at 4 (Sept. 14, 2016). This was despite the fact that the SDC's challenge, and the Judges' discovery ruling, was contrary to 37 C.F.R. § 360.4(c). Such provision applies to the filers of "July claims", such as the separate entities that collectively refer to themselves as the SDC.

6.

REDACTED

7.

REDACTED

Public Version

8.

REDACTED

REDACTED

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REDACTED

10. REDACTED

11.

REDACTED

12.

REDACTED

13.

REDACTED

Public Version

14.

REDACTED

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22nd day of March, 2020, at Lima, Peru.

_____/s/_____
Brian D. Boydston, Esq.

Public Version

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of)	
)	
Distribution of)	CONSOLIDATED DOCKET NO.
<u>Cable Royalty Funds</u>)	14-CRB-0010-CD/SD
)	(2010-2013)
In the Matter of)	
)	
Distribution of)	
<u>Satellite Royalty Funds</u>)	

**JAMES SUN DECLARATION IN SUPPORT OF
MULTIGROUP CLAIMANTS' REPLY IN SUPPORT
OF RESPONSE TO ORDER TO SHOW CAUSE**

I, James Sun, declare:

1. I am over 18 years of age and an attorney at law duly licensed to practice law in the California. I am an associate in the law firm of Pick & Boydston, LLP, attorneys of record for Multigroup Claimants in this proceeding.

2.

REDACTED

Public Version

3.

REDACTED

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22nd day of March, 2020, at Los Angeles, California.

_____/s/_____
James Sun, Esq.

Proof of Delivery

I hereby certify that on Sunday, March 22, 2020, I provided a true and correct copy of the Multigroup Claimants' Reply In Support Of Response To Order To Show Cause to the following:

National Association of Broadcasters (NAB) aka CTV, represented by John Stewart, served via Electronic Service at jstewart@crowell.com

Public Television Claimants (PTC), represented by Lindsey L. Tonsager, served via Electronic Service at ltonsager@cov.com

Settling Devotional Claimants (SDC), represented by Michael A Warley, served via Electronic Service at michael.warley@pillsburylaw.com

MPA-Represented Program Suppliers (MPA), represented by Lucy H Plovnick, served via Electronic Service at lhp@msk.com

Joint Sports Claimants (JSC), represented by Ritchie T. Thomas, served via Electronic Service at ritchie.thomas@squirepb.com

Canadian Claimants Group, represented by Lawrence K Satterfield, served via Electronic Service at lksatterfield@satterfield-pllc.com

Signed: /s/ Brian D Boydston