

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>	)	

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

I, ALFRED 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. The SDC motion attaches a 2018 and 2019 “Public Information Reports” in the State of Texas for Worldwide Subsidy Group, LLC. I have reviewed those reports filed for Worldwide Subsidy Group, LLC (“WSG”) for 2018 and 2019, which incorrectly reflect that I was a “partner” and “director” of

WSG during those years, and falsely indicate that I was the signatory to the 2018 report to the Texas Franchise Tax Board. This information is incorrect for several reasons.

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. My interest was solely as a “member”, which interest in WSG concluded in December 2017, when I transferred my interest to my grandson, Ryan Galaz. In fact, I was never presented either of the 2018 or 2019 public information reports, nor had even seen such reports until they were recently provided to me.

4. In fact, according to the SDC in a prior motion, “Alfred Galaz appears to have signed” the 2018 report. This assertion is a blatant misrepresentation by the SDC, as my signature does not appear on such document, nor the “signature” of any person. The SDC’s representation was evidently false, and I consider it to be a knowing representation intended to deceive the Judges.

5. As has now been publicized by the SDC, in May 2019 I filed for bankruptcy protection. Inadvertently, my bankruptcy petition erringly indicated that I transferred my interest in WSG to Ruth Galaz – not Ryan Galaz -- in January 2018. Upon learning of such information, I confirmed that I had provided my bankruptcy legal counsel the document transferring my interest in WSG to Ryan

Galaz, and can only presume that such legal counsel simply misread the document, and identified Ruth Galaz, a co-signatory to the document, as the transferee, not Ryan Galaz. I did not notice this error. When I inquired whether I should amend my bankruptcy petition in order to correct this error, I was informed by my bankruptcy legal counsel that because there would be literally zero consequence upon the merits of my bankruptcy filing, counsel considered amendment unnecessary.

6. Until the public revelation of my bankruptcy filing, I had not discussed the matter with any WSG representative, including Ryan Galaz, Raul Galaz, or Brian Boydston, and they were not aware of the bankruptcy petition. While I understand it to be a matter of public record, it was a private matter, and I had no intention of revealing it to any of the foregoing persons.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 17<sup>th</sup> day of March, 2020, at Tulsa, Oklahoma.

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Alfred Galaz

# Proof of Delivery

I hereby certify that on Tuesday, June 30, 2020, I provided a true and correct copy of the Alfred Galaz Declaration In Support Of Multigroup Claimants' Opposition To Settling Devotional Claimants' Motion To De-Designate Restricted Materials to the following:

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

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

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

Joint Sports Claimants (JSC), represented by Michael E Kientzle, served via ESERVICE at michael.kientzle@apks.com

MPA-Represented Program Suppliers (MPA), represented by Gregory O Olaniran, served via ESERVICE at goo@msk.com

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

Signed: /s/ Brian D Boydston