

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>)	

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

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. 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., 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 as to the appropriate persons to be identified on such reports when there has been a change of owners or personnel. In the case of Worldwide Subsidy Group, LLC (“WSG”), until this year, such public information reports have *always* been prepared by the certified tax professional engaged by WSG (not WSG personnel), and are typically not even shared with WSG personnel.

3. In 2017, Ms. Denise Vernon executed a public information report that contained a reference to her (as a member) and Mr. Brian Boydston, even though she was no longer a member of WSG. Ms. Vernon did so because such document was presented to her at the same time and along with WSG’s 2016 federal tax returns (which required her signature), and confusion existed as to the appropriate persons to be identified on the report. That is, 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 all other documents she was being requested to execute in connection with WSG’s 2016 tax return.

4. 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.

5. 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.

6. 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 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.

7. 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.

8. WSG has not identified any individual by an “officer” title for approximately ten years, and possibly longer.

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.

Raul Galaz

Proof of Delivery

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

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

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

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

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

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

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

Signed: /s/ Brian D Boydston