

Received & Inspected

OCT 16 2018

FCC Mailroom

Before The
Federal Communications Commission
Washington D.C. 20554

Re: Motion To Enlarge Issues and Request Hearing
WJCP Facility ID 61196 BAL 20180723AAB
W249DG Facility ID 141722 BALFT 20180723AAC

Motion To Enlarge
Misrepresentation by Licensee Reising and Taylor

NBM has become aware of several filings by Reising Radio Partners (Reising), JCPP, and Tom Taylor. Submissions by Reising are inherently false, misrepresentations, and lack candor are presented in the proceeding. NBM addresses the matter raised by Reising discretely and separately as Reising has presented misrepresentations for several years in regards to the

translator W275BD and has included these matters in this proceeding.

Unlike past presentations by Reising in the W275BD matter, Reising now presents a Declaration in this proceeding that his former submissions in the W275BD Proceeding were and are true and correct under Penalty of Perjury. It is shown that Reising has now committed a serious misrepresentation as he presents false filings and submissions as true and correct.

Reising made multiple submissions and Commission contacts using the alias "Mike King". Anything "Mike King" presents can be false, fictitious, misleading or a lie as "Mike King" does not exist. Reising relied on complaints from his associates presented initially, and throughout the W275BD proceeding, by "Mike King".

Reising never presents, until now, that any of the submissions or representations before Staff were true with a Declaration as "Mike King" does not exist. Reising has not disclosed in the W275BD proceeding that "Mike King" is an "alias" or "radio name" used by Michael Gehring. Gehring's name does not appear in any paperwork and has never been accompanied by a Declaration.

Now in this instant proceeding Reising presents as factual and true the former false and misleading filings by Reising and "Mike King" whose legal name is Michael Gehring.

NBM requests Staff Enlarge the Issues and designate the matter for Hearing.

Presentation of Facts - Legal

Reising had no issues with W275BD when it went on air and no complaints were generated. At a point Reising used an alias in submitting complaints to the Commission. Letters and Emails from Reising to Staff were from an alias, not a real person. Reising bases its complaints, which are self generated and submitted by "Mike King" as the basis for complaints.

A December 15, 2015 letter from Staff notes multiple submissions by "Mike King" from Reising. These complaints are from an alias, "Mike King", and also contain associates and "friends" of "Mike King" and Reising. Reising misrepresents "Mike King" is an actual person and has the ability to interact with the Federal Communications Commission as a legal person. Reising does not represent that the complaints are associates of Reising.

A January 14, 2016 letter from Staff uses the complaints generated by "Mike King" containing associates of Reising as basis for interference complaints. Reising misrepresents "Mike King" is an actual person and has the ability to interact with the Federal Communications Commission as a legal person.

An October 8, 2015 letter from Staff uses complaints generated by both "Mike King" and Keith Reising using associates of Reising to generate unfounded complaints. Reising does not offer or volunteer that "Mike King" is an alias or that complaints are based on interaction with a false entity not using his real name.

A December 5, 2016 letter from Staff includes complaints and correspondence from the alias "Mike King" using Reising associates. Reising makes material representations that are false without indicating "Mike King" is not a legal person.

December 15, 2016 Reising submits a Motion to Dismiss based on complaints generated by associates of Reising and submitted by "Mike King". This submission makes claims about "interference" however fails to indicate that "Mike King" is not a real legal person. There is no Declaration

under Penalty of Perjury by any Person however "Mike King" and complaints generated using an alias are prominent in the submission.

December 20, 2016 Keith Resising submits "Comments" and several of the Exhibits are handwritten in the handwriting of Michael Gehring who claims to be "Mike King" in the Federal submission. At no time in the submissions which rely on complaints handled and generated by "Mike King" does Reising present a Declaration under Penalty of Perjury as "Mike King" is an alias. He cannot Declare under penalty of perjury any of his statements are true and does not.

In this period of time NBM assumes the translator W275BD. May 30, 2018 Staff provides a letter, however not to the Licensee NBM. Staff provides the letter to the former Licensee. Again, this letter requires complaints be resolved however has still not received any Declaration concerning the validity of any complaint from Reising and it's representative "Mike King."

The Commission issues a "Report and Order" that is sent to the former Licensee and not the current Licensee. The complaints generated by Reising have summarily lacked a

Declaration as Reising has used an "alias" and not a legal person to generate complaints.

Staff generates it's first letter to NBM however it is sent to an incorrect mailing address, PO Box 486, which we have determined is an address used by Reising and Staff has somehow incorrectly used this address. This letter was never received. Staff is still unaware that Reising has failed to submit any Declaration as it has used an "alias", "Mike King" to generate complaints.

July 23 2018 Staff presented a letter to NBM at an incorrect address, first used by Reising, Box 486. This correspondence was never received. Staff is unaware that "Mike King" who generated and filed complaints is not a legal person. No Declaration from the Licensee exposes the use of an "alias" to generate serious allegations as the Declaration would need to represent "Mike King" is not a real legal person.

Legal

Until this point the submissions by Reising are not seen for what they are, subterfuge. Reising has made attempts using

an employee with an "alias", "Mike King", to generate a Federal Complaint. Reising made several submissions regarding W275BD, however, was careful by never submitting a Declaration under Penalty of Perjury. The initial complaints and each successive complaint relied on false complaints generated by a Reising employee using a fake name. Staff didn't realize they were being lied to.

Conclusion

Reising has manipulated Staff in the W275BD Proceeding. By making submissions which Staff later used to change the address of NBM, Reising kept NBM from being aware of communications from Staff. Reising is a seasoned broadcaster and knows how to work the system.

In presenting the W275BD matter in this proceeding, Reising made a mistake of certifying each of his submissions in the W275BD matter with his Declaration. His submissions using an employee presenting Federal Complaints with a fake name is clearly misrepresentation.

Reising has attempted to interject an emotional pleading. Reising has indicated Reising and JCPP are separate entities. By including a Reising entity in the JCPP_ matter it

is clear the operations of each Reising facility are interconnected.

NBM requests a Hearing on each Reising License, and those of Good Shepard Radio which is controlled by Reising.

Respectfully Submitted



Martin Hensley
New Beginnings Movement

STATEMENT OF MARTIN HENSLEY

I am Martin Hensley, a Board Member of New Beginnings Movement (NBM) and a Party In Interest to the noted Application. New Beginnings is a Party In Interest and Aggrieved Party as a result of a contract before the Commission for sale of W249DG. This statement is true under penalty of perjury. The matters within this Motion to Enlarge and Request For Hearing are proper and supported by this Statement as True.

"Mike King" is an "alias" used by Mike Gehring or Michael Gehring and is not his legal name. He uses the name "Mike King Gehring" on facebook, incorporating his actual name and his "alias".

A copy of the pleadings are being sent to the legal address of Tom and Diana Taylor Box 728 North Vernon Indiana, to Keith Reising co RINI ONEAL PC 1200 New Hampshire Avenue NW, Suite 600 Washington DC. 20554, and to the Media and Enforcement Bureaus.

Respectfully Submitted


Martin Hensley
New Beginnings Movement

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