

Before The  
Federal Communications Commission  
Washington D.C. 20554

Re: Supplement on Transfer of Control  
WJCP Facility ID 61196 BAL 20180723AAB  
W249DG Facility ID 141722 BALFT 20180723AAC  
W275BD  
WXCH BRH 20120402ACJ

Pre Control of WJCP and W249DG /  
Return of W249DG License to NBM (Unwind)

Background

Petitioner wishes to further solidify so the matter is well settled in this proceeding reflective of pre control and interference by a Licensee (Reising) in this matter. Petitioner New Beginnings Movement (NBM) as an affected party has requested unwind of the consummation of W249DG and restates its request for unwind herein. Petitioner has previously provided documents exhibiting pre control in this matter and includes these previously filed documents by Reference.

Petitioner has demonstrated the Consummation of W249DG violates Section 310(d) of the Communications Act by Licensee Reising and demonstrates Pre Control and Transfer of Control to Reising and has requested a Hearing on the Matter.

As the applicant Tom Taylor and Keith Reising have submitted three applications for transfer by filing then amending, NBM shows the three filings are representative of specific conditions financial and operational substantial control by Reising of WJCP and W249DG. By the manner in which the Agreement with NBM was undertaken and the involvement of a third party, Reising we demonstrate each condition is a substantial Act of substantial control. NBM demonstrates each Act is misrepresentation and lack of candor by both Licensees.

Legal

Section 310(d) of The Communications Act states: No construction permit or station license, or any rights thereunder, shall be transferred, assigned, or disposed of in any manner, voluntarily or involuntarily, directly or indirectly, or by transfer of control of any corporation holding such permit or license, to any person except upon application to the Commission and upon finding by the Commission that the public interest, convenience, and necessity will be served thereby.

Pre Control Transfers (Paper filings)

1) Licensee Reising and Taylor have submitted three total requests for transfer. The first is dated 7/20/2018, The second is dated 9/06/2018, and the third is dated 9/17/2018.

- 2) The first application for Assignment is dated before consummation of W249DG and is signed by Tom Taylor as "Managing Member of Parent Company". We are not sure which company Taylor is referring to. Previously Taylor has stated he is a "sole proprietor". NBM notes this designation indicates substantial control by someone other than Tom Taylor.
- 3) The first application pre dates the payment by Reising Radio Partners or Jennings County Promotion Partners to NBM. Taylor told NBM this was a payment from him under the Asset Purchase Agreement filed with Staff. NBM demonstrates this is clearly indicative of pre control as the date of the check (previously in record) from Reising is dated 7/20/2018. NBM indicates demonstration of pre control.
- 4) Prior to the filing Taylor had no lawyer. In fact, on June 23 2018 when Taylor presented the first payment to NBM he asked for the Consummation to be filed by NBM and indicated on June 23, 2018 he had no legal representation. He never mentioned Rini Oneal PC. Taylor indicated clearly to NBM there was no lawyer he had any agreement with. Taylor has since indicated he had no buyer for W249DG prior to consummation filing June 23, 2018 and Reising declares this is true. These facts do not align. This is further massive demonstration of a continued substantial control by a third party, Reising. This is also a massive devious process to cover up the Acts by Reising.
- 5) Yet Taylor is represented through some arrangement by Keith Reising's lawyer of Record Rini Oneal PC prior to the date he represented he had no Lawyer. Simply a paper trail of financial involvement by Reising in the transaction showing substantial control.
- 6) The second application for transfer of BAL 20180723AAB is 9/06/2018. This application is signed by Tom Taylor indicating he is now "co owner". Taylor had amended the language of the first application yet we can't be sure why and no explanation is provided. Reising is shown to be in control of the facilities prior to Commission approval of Transfer already owning a substantial portion of the assets and equipment of WJCP and W249DG prior to May 30, 2018. NBM demonstrates substantial control by Reising.
- 7) The second Exhibit attached clearly indicates Reising is running the facility WJCP and Translator W249DG. Again, Legal representation is by Rini Oneal PC, Reising's Counsel of Record. NBM clearly demonstrates substantial control by Reising.
- 8) The second application provides a multiple ownership statement however does not indicate that Reising's facilities WXCH and WRZQ are using altered contours not represented. Reising has utilized pattern studies and tuned resonant tower sections to advance his facilities signals by his own representation.
- 7) The third application 9/17/2018. Reising is using his Counsel of Record. Again, Taylor has represented he had no counsel after the date of the first application. While all applications have an accepted date when the application was filed the original application was filed June 20, 2018, the day Reising presented a check to NBM demonstrating substantial control by Reising. This check was for nearly \$24,000.
- 8) Reising had already purchased the land, towers, and equipment for WJCP and W249DG prior to May 30, 2018 without advising Staff of this fact. Previously submitted records demonstrate this. County property records indicate the land is assessed at more than \$40,000. The equipment and tower are estimated to be another \$50,000 conservatively. Then Reising presents a check for nearly \$24,000. The total of Reising's



purchases or ownership of assets is shown to be easily \$114,000. This is almost the total purchase price Reising and Taylor have presented to Staff that Reising is paying for the stations.

9) NBM demonstrates with an investment of \$90,000 prior to May 30 of 2018 Reising is in substantial control of WJCP and W245DG.

10) NBM demonstrates with another Reising cash influx of nearly \$24,000 on June 20, 2018, presented to NBM on June 23, 2018 there is substantial involvement by Reising as outlined in an inappropriate transfer of control or substantial control of the Licenses by Reising. This demonstrates violation of Section 310(d) of The Communications Act.

11) Reising also has constructed a new studio facility expected to have cost thousands of dollars in North Vernon Indiana. Clearly there are multiple iconic Acts of substantial control. Each Act has taken substantial time and effort by a Licensee who does not yet have approval to own WJCP or W249DG, many before Taylor owned W249DG.

12) Reising and Taylor do not allow the Public to see the many Agreements which NBM believes would be more than this tip of an iceberg in regards to pre control and violation of Section 310(d) of the Communications Act.

### Conclusion

NBM has demonstrated Reising is in substantial control of the assets of WJCP and W249DG. Several of the Acts attributable are in May of 2018 well before Reising incorporated Jennings county Promotion Partners. NBM shows at least \$90,000 in expense by Reising in May of 2018 for purchase of land and equipment for the facilities. This is evidence Reising's complete Corporate structure is involved in the Acts.

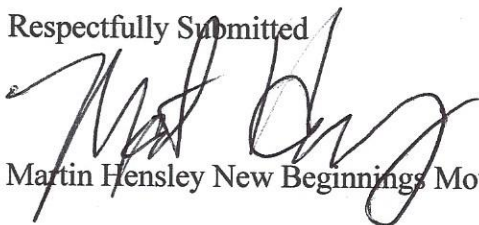
Reising has deceptively while working with Tom Taylor obtained the License of W249DG through material misrepresentation and an unwind should take place of the W249DG Consummation. Another Reising Expense of nearly \$24,000 in a check to NBM took place June 20, 2018.

NBM has demonstrated Reising raised the issue of W275BD in this proceeding and has asked for a Hearing as Reising has A) Used misrepresentation through fake correspondence presented in a Federal Proceeding; B) Used a person using a fake name or alias in Federal Court Commission Proceedings; and C) Used financial influence and threats to damage NBM by corrupt and deceptive harmful intent.

NBM requests unwind of W249DG immediately as it is well settled the proposed Licensee Taylor and Reising misrepresented material facts.

NBM requests review of the W275BD Proceeding and Hearing on Reising Licenses.

Respectfully Submitted



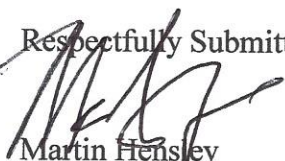
Martin Hensley New Beginnings Movement

### STATEMENT OF MARTIN HENSLEY

I am Martin Hensley, a Board Member of New Beginnings Movement (NBM) and a Party In Interest to the noted Applications. NBM is a Party In Interest and Aggrieved Party as a result of a contract before the Commission for sale of W249DG and misrepresentations regarding W275BD. This statement is true under penalty of perjury. The matters within this pleading are proper and supported by this Statement as True.

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  
317448-0973

Exhibit 1 Section 1 and 2 BAL 20180723AAB dated 07/23/2018

Contact Representative (if other than assignee) DAVID G. O'NEIL, ESQ.

Firm or Company Name RINI O'NEIL, PC

Mailing Address 1200 NEW HAMPSHIRE AVENUE, NW SUITE 600 City WASHINGTON

State or Country (if foreign address) DC

Zip Code 20036

Telephone Number (include area code) 2029553931

E-Mail Address (if available) DONEIL@RINIONEIL.COM

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing TOM TAYLOR

Typed or Printed Title of Person Signing CO-OWNER SignatureDate 09/06/2018 WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibit 2 Section 2 BAL 20180723AB dated September 9, 2018

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

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Exhibit 3 Section 2 BAL20180723AAB dated 9/17/2018

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

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