

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
ENTERTAINMENT MEDIA TRUST,)	MB Docket No. 19-156
DENNIS J. WATKINS, TRUSTEE)	
)	
Applications to Renew License:)	
)	
KFTK(AM) (formerly WQQX(AM)), East St.)	Facility ID No. 72815
Louis, Illinois)	File No: BR-20120709ACP
)	
WQQW(AM), Highland, Illinois)	Facility ID No. 90598
)	File No. BR-20120709AC0
)	
KZQZ(AM), St. Louis, Missouri)	Facility ID No. 72391
)	File No. BR-20120921AAW
)	
KQQZ(AM), DeSoto, Missouri)	Facility ID No. 5281
)	File No. BR-20120921ABA
)	
Application for Consent to Assignment of)	
Licenses:)	
)	
KFTK(AM) (formerly WQQX(AM)), East St.)	Facility ID No. 72815
Louis, Illinois)	File No: BAL-20160919ADH
)	
WQQW(AM), Highland, Illinois)	Facility ID No. 90598
)	File No. BAL-20160919ADI
)	
KZQZ(AM), St. Louis, Missouri)	Facility ID No. 72391
)	File No. BAL-20160919ADJ
)	
KQQZ(AM), DeSoto, Missouri)	Facility ID No. 5281
)	File No. BAL-0160919ADK
)	
Application for Permit to Construct New)	Facility ID No. 200438
Station:)	File Nos. BNPFT-20170726AEF
)	BNPFT-20180314AAO
W275CS, Highland, Illinois)	

To: Entertainment Media Trust, Dennis Watkins, Trustee

**FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO ENTERTAINMENT
MEDIA TRUST, DENNIS J. WATKINS, TRUSTEE**

Mark Kern (“Petitioner”), pursuant to Section 1.325 of the Commission’s rules, hereby requests that Entertainment Media Trust, Dennis J. Watkins, Trustee (collectively “EMT”) produce the documents as defined and specified herein. 47 C.F.R. § 1.325. The documents should be delivered to Petitioner’s Outside Counsel-of-Record within ten calendar days of this request.

DEFINITIONS

For the purpose of this First Request for Production of Documents, the following definitions shall apply:

a. “EMT” and “the Trust” and “you” and “your” shall mean Entertainment Media Trust, Dennis Watkins, Trustee, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing during the period January 1, 2006 through the present.

b. “EMT #2” or “Trust #2” shall mean Entertainment Media Trust #2, Dennis Watkins, Trustee, any affiliate, d/b/a, including all other persons acting or purporting to act on its behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing during the period September 14, 2016 through the present.

- c. For purposes of the definition of EMT, “you” and “your” shall also include, but not be limited to, Dennis J. Watkins.
- d. “Romanik” shall mean Robert Romanik.
- e. “Stations” shall mean Stations KFTK(AM) (formerly WQQX(AM)), WQQW(AM), KZQZ(AM), KQQZ(AM), and W275CS.
- f. The term “and” also means “or” and the term “or” also means “and.”
- g. The term “each” also means “every” and the term “every” also means “each.”
- h. The term “all” also means “any” and the term “any” also means “all.”
- i. “Written Communication” means any written or electronic correspondence of any kind.
- j. “Document” shall mean the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form) in the possession, custody, or control of EMT, EMT #2, or Trust #2.

- k. “Employee” means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.
- l. “Representative” means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.
- m. “Entity” means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.
- n. “Person” means any natural person or legal entity, including but not limited to any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.
- o. “On-Air Personalities” means persons that regularly appear on Station programming.
- p. “Local permits” means all permits that must be obtained by a local authority regarding the zoning, construction, or operation of the Stations.
- q. The phrases “referring to” and “relating to” shall be interpreted broadly and shall include, but not be limited to, the following meanings: constituting, comprising, evidencing, reflecting, respecting, discussing, referring to, stating, describing, recording, noting, considering, embodying, evaluating, analyzing, mentioning, containing, indicating, pertaining to, showing, bearing upon, studying, memorializing, or commenting upon, or any other term synonymous with or similar to the foregoing.
- r. The term “related to” shall mean the same as intended by EMT in its response to the Enforcement Bureau’s Request for Admissions (“RFAs”).
- s. The term “regarding” shall mean the same as EMT intended in its response to the RFAs.
- t. The term “concerning” shall mean the same as EMT intended in its response to the RFAs.

INSTRUCTIONS

- a. EMT and EMT #2 have an obligation to produce all documents, papers, books, accounts, letters, or other tangible things responsive to these Document Requests that are in their possession, custody, or control.
- b. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.
- c. You are to produce entire documents, including attachments, enclosures, cover letter, memoranda, and appendices.
- d. Any document or thing produced pursuant to these Document Requests shall be serially numbered and reflect the name of the party or entity producing the document or thing. For each document or statement submitted in response to these Document Requests, indicate, by number, to which of these Document Requests it is responsive and identify the person(s) from whose files the document was retrieved.
- e. Any document or thing called for under these Document Requests but not produced on the basis of a claim of privilege should be identified by the name of the preparers, the name of all recipients (including copy recipients), the date of the document, the nature or type of document (*e.g.*, memorandum, letter, *etc.*), and the general nature of the subject matter for which a privilege is claimed. All such documents and/or things shall be listed on a privilege log and the log shall be supplied at a time and place to be agreed upon by counsel.
- f. In response to each of these Document Requests, you shall affirm whether responsive documents exist and have been, or shall be, produced. If a document responsive to any of these Document Requests existed but is no longer available, identify each such document by author, recipient, date, title, and specific subject matter, and explain why the document is not available.

g. Unless otherwise specified, supply all information requested for the period January 1, 2006 through the present.

DOCUMENTS REQUESTED

1. All written correspondence regarding the local permits associated with the transmitter site(s) for the Stations.
2. All local permits associated with the transmitter site(s) for the four Station transmission towers.
3. All correspondence regarding the permits associated with the transmitter site(s) for the four Station transmission towers.
4. The original lease, and all subsequent leases and amendments, for the transmitter site(s) for the Stations.
5. All employment agreements and Performer Agreements for all On-Air Personalities for the Stations.
6. All Written Communications between Anthony Lepore and Romanik.
7. All Written Communications between Fletcher, Heald & Hildreth and Romanik.
8. All Written Communications between Romanik and his son, Stephen Romanik, concerning the Station(s).

Respectfully submitted,

/s/ Robert G. Kirk

Robert G. Kirk

Howard M. Liberman

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CERTIFICATE OF SERVICE

I, Robert G. Kirk, hereby certify that on this 9th day of September 2019, copies of the attached "First Request for Production of Documents" were sent via email to the following:

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