

**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: Donald M. Samson, Trustee

**FIRST SET OF INTERROGATORIES TO
DONALD M. SAMSON, TRUSTEE**

Mark A. Kern (“Petitioner”), pursuant to Section 1.323 of the Commission’s rules, hereby submits his First Set of Interrogatories to Donald M. Samson, Trustee (“Trustee”). Trustee shall deliver his responses to Petitioner’s Outside Counsel-of-Record within fourteen days of the date of these interrogatories.

The obligation of Trustee to answer these interrogatories is continuing in nature. Trustee has an obligation to provide in the future any and all additional responsive information that may come to his attention subsequent to answering these interrogatories but not initially disclosed at the time, date and place set forth herein or in any supplemental answers that he submits. In this regard, Trustee must supplement his initial and supplemental responses if he learns that, in some material respect, the responses initially provided, or as supplemented, were incomplete or incorrect or if additional responsive information is acquired by or has become known after his initial or supplemental responses.

DEFINITIONS

For the purpose of this document, the following definitions shall apply:

- a. “Trustee” shall mean Donald M. Samson and all other persons acting or purporting to act on his behalf.
- b. “Assignment Application” shall mean the application submitted to the FCC to place the Trustee in control of EMT’s licenses.
- c. “EMT” and “the Trust” 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.

d. “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.

e. “Insane” shall mean Insane Broadcasting Company, 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.

f. “Romanik” shall mean Robert Romanik.

g. “Sanders” shall mean Katrina Sanders.

h. “Stations” shall mean Stations KFTK(AM) (formerly WQQX(AM)), WQQW(AM), KZQZ(AM), KQQZ(AM), and W275CS.

i. “Watkins” shall mean Dennis I. Watkins, Trustee of EMT and EMT #2.

j. The term “and” also means “or” and the term “or” also means “and.”

- k. The term “each” also means “every” and the term “every” also means “each.”
- l. The term “all” also means “any” and the term “any” also means “all.”
- m. “State” and “describe” shall mean to set forth a complete and detailed statement of all information, circumstances and facts that refer to, relate to, reflect, comprise or bear upon the matter concerning which information is requested.
- n. “Identify” and “identification” when used in reference to an individual person shall mean to state his or her full name, residence and business telephone numbers, and present residence and business addresses if known, and his or her present or last known title, position and business affiliation.
- o. “Identify” when used with reference to a person or persons shall mean to state his or her full name; last known business and residence addresses; and last known business and residence telephone numbers.
- p. “Identify” and “identification” when used in reference to a person other than a natural person shall mean to state the full and official name of the business entity, its principal place of business, and the main telephone number of such business entity.
- q. “Identify” and “identification” when used in reference to a document shall mean to state its date, type (e.g., memo, telecopy, email), and its authors, addressees, title, if any, and, if no title, a brief description of the subject matter of the document and its present or last known location and custodian. If any document once was, but is no longer, in your possession, custody, or control, state what disposition was made of it and the reason for such disposition.
- r. “Identify” and “identification” when used in reference to any act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication, shall mean to: (a) describe the nature and

substance of the act, activity, practice, policy, effort, event, transaction, negotiation, discussion, conversation, occasion, occurrence, meeting, representation, agreement or communication; (b) state the date when and place where it occurred; and (c) identify each person who was a participant therein.

s. “Written Communication” means any written or electronic correspondence of any kind.

t. “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 Trustee.

u. “Employee” means any employee, partner, or servant of the Trustee, whether active or retired, full-time or part-time, current or former, and compensated or not.

v. “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 Trustee.

w. “Entity” means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

x. “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.

y. 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.

INSTRUCTIONS

a. Each interrogatory shall be answered separately and fully in writing under oath or affirmation and the answers shall be signed by the person making them. If an interrogatory is objected to, the reasons for the objection shall be stated in lieu of an answer and signed by the attorney making them.

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. In the event you are unable to respond to any Interrogatory, please explain why you are unable to respond.

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

INTERROGATORIES

1. Identify the name and contact information for each current employee and consultant of EMT.
2. Identify the name and contact information for each current employee and consultant of the Stations.
3. Identify who will be paying the Trustee for services rendered during the EMT bankruptcy.
4. Identify who will be paying the Trustee for services rendered in the captioned-proceeding.
5. Identify who will be paying Trustee's counsel in the EMT bankruptcy proceeding.
6. Identify who will be paying Trustee's counsel in the above-captioned hearing proceeding.
7. Describe the role Insane plays regarding the programming and operation of the Stations.
8. Describe all Communications between Trustee and Romanik.
9. Describe all Communications between Trustee and Sanders.
10. Identify who makes programming decisions for the Stations.
11. Identify who controls the Stations' employees.
12. Identify who makes hiring and firing decisions for the Stations.
13. Identify who controls routine payroll, accounting, and administrative support functions for the Stations.
14. Describe how fees (including attorneys fees) incurred by the Trustee as part of the bankruptcy proceeding and FCC hearing will be paid.
15. Describe why you decided to change your position on EMT's withdrawal from bankruptcy.

16. Describe how the identity of the bidders and potential bidders for the EMT licenses before the bankruptcy court were communicated to Romanik.

17. Identify who communicated the identity of the bidders and potential bidders for the EMT licenses to Romanik.

Respectfully submitted,

/s/ Robert G. Kirk

Robert G. Kirk

Howard M. Liberman

WILKINSON BARKER KNAUER, LLP

1800 M Street, NW, Suite 800N

Washington, DC 20036

202.783.4141

November 20, 2019

CERTIFICATE OF SERVICE

I, Robert G. Kirk, hereby certify that on this 20th day of November 2019, copies of the attached “First Set of Interrogatories” were sent via email to the following:

Anthony Lepore, Esq.
Radiotvlaw Associates, LLC
4101 Albermarle St., NW #324
Washington, D.C. 20016-2151
anthony@radiotvlaw.net

Davina S. Sashkin, Esq.
Fletcher, Heald & Hildreth, LLC
1300 North 17th Street, 11th Floor
Arlington, VA 22209
sashkin@fhhlaw.com

Jeffrey Gee, Esq.
Pamela Kane, Esq.
Anya Baez, Esq.
Enforcement Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554
EBHearings@fcc.gov

Dennis J. Watkins, Trustee*
Entertainment Media Trust
6500 West Main Street
Suite 315, Belleville, IL 62223

The Honorable Jane Hinkley Halprin
Office of Administrative Law Judges
Federal Communications Commission
445 12th Street SW
Washington, DC 20554
Jane.Halprin@fcc.gov

John B. Adams
Office of Administrative Law Judges
Federal Communications Commission
445 12th Street SW
Washington, DC 20554
JohnB.Adams@fcc.gov

/s/ Robert G. Kirk
Robert G. Kirk

*Via Federal Express