

PREDICATE ACT 81

On or about December 15, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Robert Kidd which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 82

Beginning on or about December 24, 1987 and continuing through January 6, 1988 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Bobby Hiers which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 83

On or about January 7, 1988 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Glenn's Coins which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 84

On or about January 8, 1988 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Gary Rust which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 85

On or about January 14, 1988 in the Second Judicial Circuit of Florida, that is: Leon County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Kenneth Hosford which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 86

On or about March 3, 1988 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Martha Damerow which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 87

On or about March 4, 1988 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Harold McDuffie d/b/a PhD Construction which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 88

On or about March 10, 1988 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Rose Young which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 89

On or about June 17, 1988 in the Sixth Judicial Circuit of Florida, that is: Pinellas County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Don Kirshner which security was not registered as required by Chapter 517 of the Florida statutes, contrary to Florida Statutes 517.07 and 517.302.

PREDICATE ACT 90

On or about September 23, 1986 in the Second Judicial Circuit of Florida, that is: Gadsden County, Florida, **EUGENE B. WHITE** did unlawfully, with intent to defraud, obtain a promissory note or other instrument evidencing a debt from Sally Todd or obtain the signature of Sally Todd to a promissory note or other instrument evidencing a debt by color or aid of fraudulent or false representation or pretenses, in violation of Florida Statute 817.54.

PREDICATE ACT 91

On or about November 4, 1986 in the Twelfth Judicial Circuit of Florida, that is: Manatee County, Florida, **EUGENE B. WHITE** did unlawfully, with intent to defraud, obtain a promissory note or other instrument evidencing a debt from Valerie Fairfield or obtain the signature of Valerie Fairfield to a promissory note or other instrument evidencing a debt by color or aid of fraudulent or false representation or pretenses, in violation of Florida Statute 817.54.

PREDICATE ACT 92

On or about March 20, 1987 in the Fourth Judicial Circuit of Florida, that is: Duval County, Florida, **EUGENE B. WHITE** did unlawfully, with intent to defraud, obtain a promissory note or other instrument evidencing a debt from Hilliard Stanley or obtain the signature of Hilliard Stanley to a promissory note or other instrument evidencing a debt by color or aid of fraudulent or false representation or pretenses, in violation of Florida Statute 817.54.

PREDICATE ACT 93

On or about June 2, 1987 in the Twentieth Judicial Circuit of Florida, that is: Charlotte County, Florida, **EUGENE B. WHITE** did unlawfully, with intent to defraud, obtain a promissory note or other instrument evidencing a debt from Judith French or obtain the signature of Judith French to a promissory note or other instrument evidencing a debt by color or aid of fraudulent or false representation or pretenses, in violation of Florida Statute 817.54.

PREDICATE ACT 94

On or about June 2, 1987 in the Sixteenth Judicial Circuit of Florida, that is: Monroe County, Florida, **EUGENE B. WHITE** did unlawfully, with intent to defraud, obtain a promissory note or other instrument evidencing a debt from Todd Swofford or obtain the signature of Todd Swofford to a promissory note or other instrument evidencing a debt by color or aid of fraudulent or false representation or pretenses, in violation of Florida Statute 817.54.

PREDICATE ACT 95

On or about June 10, 1987 in the Fifth Judicial Circuit of Florida, that is: Marion County, Florida, **EUGENE B. WHITE** did unlawfully, with intent to defraud, obtain a promissory note or other instrument evidencing a debt from Sharon Hall or obtain the signature of Sharon Hall to a promissory note or other instrument evidencing a debt by color or aid of fraudulent or false representation or pretenses, in violation of Florida Statute 817.54.

PREDICATE ACT 96

On or about July 31, 1987 in the Fourteenth Judicial Circuit of Florida, that is: Bay County, Florida, **EUGENE B. WHITE** did unlawfully, with intent to defraud, obtain a promissory note or other instrument evidencing a debt from Betty Hice or obtain the signature of Betty Hice to a promissory note or other instrument evidencing a debt by color or aid of fraudulent or false representation or pretenses, in violation of Florida Statute 817.54.

PREDICATE ACT 97

On or about October 22, 1987 in the Twelfth Judicial Circuit of Florida, that is: Sarasota County, Florida, **EUGENE B. WHITE** did unlawfully, with intent to defraud, obtain a promissory note or other instrument evidencing a debt from Martha Robertson or obtain the signature of Martha Robertson to a promissory note or other instrument evidencing a debt by color or aid of fraudulent or false representation or pretenses, in violation of Florida Statute 817.54.

PREDICATE ACT 98

On or about February 5, 1988 in the First Judicial Circuit of Florida, that is: Santa Rosa County, Florida, **EUGENE B. WHITE** did unlawfully, with intent to defraud, obtain a promissory note or other instrument evidencing a debt from Norman and Alma Jean Coleman or obtain the signatures of Norman and Alma Jean Coleman to a promissory note or other instrument evidencing a debt by color or aid of fraudulent or false representation or pretenses, in violation of Florida Statute 817.54.

PREDICATE ACT 99

Beginning on or about January 1, 1988 and continuing through September 30, 1989 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE AND EUGENE B. WHITE**, did unlawfully engage in a scheme to defraud as defined in Florida Statute 817.034(3)(d), and did obtain property with an aggregate value of \$50,000 or more, to wit: \$50,000 or more in United States currency from the proceeds from the sale of the investment interests of others in Domestic Public Cellular Radio Telephone Service System Construction Permits, contrary to Florida Statute 817.034(4)(a) (1986 Supp.).

PREDICATE ACT 100

On or about October 13, 1988 in the Nineteenth Judicial Circuit of Florida, that is: Indian River County, Florida, **THOMAS L. ROOT** did knowingly and unlawfully obtain or use, or endeavor to obtain or use, the property of another, to wit: United States currency in the amount of \$80,000 belonging to Blessed FM Partnership, a South Carolina partnership, comprised of one or more investors from the State of Florida, with intent to either temporarily, or permanently deprive them of a right to the property or a benefit therefrom or to appropriate the property to his own use or to the use of any person not entitled thereto, and the value of said property being \$20,000 or more, but less than \$100,000, contrary to Florida Statutes 812.014(1) and (2)(b).

PREDICATE ACT 101

On or about January 18, 1989 in the Sixth Judicial Circuit of Florida, that is: Pinellas County, Florida, **THOMAS L. ROOT** did knowingly and unlawfully obtain or use, or endeavor to obtain or use, the property of another, to wit: United States currency in the amount of \$146,000 belonging to Canal Association, a Louisiana partnership, comprised of one or more investors from the State of Florida, with intent to either temporarily, or permanently deprive them of a right to the property or a benefit therefrom or to appropriate the property to his own use or to the use of any person not entitled thereto, and the value of said property being \$100,000 or more, contrary to Florida Statutes 812.014(1) and (2)(a).

PREDICATE ACT 102

On or about March 2, 1989 in the Twelfth Judicial Circuit of Florida, that is: Manatee County, Florida, **THOMAS L. ROOT** did knowingly and unlawfully obtain or use, or endeavor to obtain or use, the property of another, to wit: United States currency in the amount of \$50,000 belonging to Holmes Beach FM Partnership, a Florida partnership, with intent to either temporarily, or permanently deprive the partnership of a right to the property or a benefit therefrom or to appropriate the property to his own use or to the use of any person not entitled thereto, and the value of said property being \$20,000 or more, but less than \$100,000, contrary to Florida Statutes 812.014(1) and (2)(b).

PREDICATE ACT 103

Beginning on or about September 1, 1988 and continuing through September 30, 1989 in the Sixth, Ninth, Thirteenth, Fifteenth and Nineteenth Judicial Circuits of Florida, that is: Pinellas, Pasco, Orange, Hillsborough, Palm Beach and Indian River Counties, Florida, **RALPH M. SAVAGE** and **THOMAS L. ROOT** did unlawfully engage in a scheme to defraud as defined in Florida Statute 817.034(3)(d), and did obtain property with an aggregate value of \$50,000 or more, to wit: \$50,000 or more in United States currency, from the sale of investment contracts for an interest in an FM radio construction permit or license to operate an FM radio station, contrary to Florida Statute 817.034(4)(a).

PREDICATE ACT 104

On or about July 17, 1989 in the Second and Sixth Judicial Circuits of Florida, that is: Leon and Pinellas Counties, Florida, **RALPH M. SAVAGE**, as an officer of a Florida corporation, to wit: SportsQuest, Inc. of Panama City Beach, did unlawfully issue, or sign, or endorse with intent to issue, certificates of stock in SportsQuest, Inc. of Panama City Beach or issued, signed, or endorsed with intent to issue a bond, note, bill, or other obligation or security in the name of SportsQuest, Inc. of Panama City Beach, beyond the amount authorized by law, or limited by the legal votes of such corporation or its proper officers, in violation of Florida Statute 817.20.

In violation of Florida Statute 895.03 and against the peace and dignity of the State of Florida.

COUNT 2

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about January 1, 1986 and continuing through September 30, 1989 in the First, Second, Fourth, Fifth, Sixth, Twelfth, Fourteenth, Sixteenth, Seventeenth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Santa Rosa, Leon, Gadsden, Duval, Marion, Pinellas, Manatee, Sarasota, Bay, Monroe, Broward, Indian River, St. Lucie, Hendry and Charlotte Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully agree, conspire, combine, or confederate with each other, and with persons known and unknown, to associate with or become employed by an enterprise as defined in Section 895.02(3), Florida Statutes, to wit: Sonrise Management Services, Inc., a Georgia corporation, a legal entity, for the purpose of engaging in a pattern of racketeering activities within the meaning of Section 895.02(1), Florida Statutes, by committing or attempting to commit, soliciting, coercing, or intimidating others to commit crimes chargeable by Indictment or Information under Chapters 517 (relating to sale of securities and investor protection), 812 (relating to theft), and 817 (relating to fraudulent practices), in violation of Florida Statutes 895.03(3) and (4).

COUNT 3

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about January 1, 1986 and continuing through September 30, 1989 in the First, Second, Fourth, Fifth, Sixth, Twelfth, Fourteenth, Sixteenth, Seventeenth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Santa Rosa, Leon, Gadsden, Duval, Marion, Pinellas, Manatee, Sarasota, Bay, Monroe, Broward, Indian River, St. Lucie, Hendry and Charlotte Counties, Florida, **RALPH M. SAVAGE AND EUGENE B. WHITE**, unlawfully, with criminal intent, received proceeds derived, directly or indirectly, from a pattern of racketeering activity, as defined in Florida Statute 895.02(4), to wit: violations of Florida Statutes 517.07, 517.301, 517.302 (relating to securities); 812.014 (relating to theft); and, 817.034 and 817.20 (relating to fraudulent practices), and used or invested, directly or indirectly, any part of such proceeds, or the proceeds derived from the investment or use thereof, in the acquisition of any title to, or any right, title, interest, or equity in, real property or in the establishment or operation of any enterprise, as defined in Florida Statute 895.02(3), to wit: Victory Communications, Inc., a Georgia corporation; Universal Communications Inc., a Georgia Corporation; Conquest Development, Inc., a Florida corporation; and, SportsQuest, Inc. of Panama City Beach, a Florida corporation, in violation of Florida Statute 895.03(1).

COUNT 4

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about January 1, 1986 and continuing through September 30, 1987, in the Second, Fourth, Fifth, Sixth, Twelfth, Fourteenth, Sixteenth, Seventeenth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Leon, Gadsden, Duval, Marion, Pinellas, Manatee, Sarasota, Bay, Monroe, Broward, Indian River, and Charlotte Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, through a scheme or operation by fraud or misrepresentation, did unlawfully obtain property of an aggregate value of \$50,000 or more, to wit: \$50,000 or more in United States currency from five or more persons, including, but not limited to: Michele M. Smith, Carl Shavers, Shirley Sanborn, Myles and Rose Young, Harold McDuffie d/b/a PhD Construction, and Guy and Willie Poteat, from the sale of investment contracts for an interest in an FM radio construction permit application, contrary to Florida Statute 817.036 (1985).

COUNT 5

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about October 1, 1987 and continuing through September 30, 1989 in the First, Second, Sixth, Twelfth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Santa Rosa, Leon, Pinellas, Sarasota, Manatee, St. Lucie, Indian River and Hendry Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully engage in a scheme to defraud as defined in Florida Statute 817.034(3)(d), and did obtain property with an aggregate value of \$50,000 or more, to wit: \$50,000 or more in United States Currency, from the sale of investment contracts for an interest in an FM radio construction permit application, contrary to Florida Statute 817.034(4)(a) (1986 Supp.).

COUNT 6

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about October 1, 1986 and continuing through September 1, 1988 in the Second, Sixth, Seventeenth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Leon, Pinellas, Broward, Indian River, St. Lucie, and Hendry Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully offer or sell in the State of Florida a security or investment, to wit: an investment contract for an interest in an FM radio station construction permit application, in violation of Florida Statute 517.301 (relating to fraudulent transactions) or 517.311 (relating to false representations) and thereby obtained money or property of an aggregate value exceeding \$50,000, to wit: \$50,000 or more in United States currency, from five (5) or more persons, to wit: Michele M. Smith, Shirley Sanborn, Carl Shavers, Myles and Rose Young, Guy and Willie Poteat, Marie Pewterbaugh, Nancy Moon, Bobby Hiers, and Harold McDuffie d/b/a PhD Construction, among others, in violation of Florida Statute 517.302(2).

COUNT 7

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about April 28, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$2,970 in United States currency from John Hood by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon John Hood, contrary to Florida Statutes 517.301 and 517.302.

COUNT 8

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$17,820 in United States currency from Myles and Rose Young by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Myles and Rose Young, contrary to Florida Statutes 517.301 and 517.302.

COUNT 9

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about June 6, 1987 and continuing through November 3, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$13,200 in United States currency from Carl Shavers by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Carl Shavers, contrary to Florida Statutes 517.301 and 517.302.

COUNT 10

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Angela Thigpen by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Angela Thigpen, contrary to Florida Statutes 517.301 and 517.302.

COUNT 11

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 19, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Barry Shavers by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Barry Shavers, contrary to Florida Statutes 517.301 and 517.302.

COUNT 12

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 22, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from George S. Johnson by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon George S. Johnson, contrary to Florida Statutes 517.301 and 517.302.

COUNT 13

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Madeline Sarna by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Madeline Sarna, contrary to Florida Statutes 517.301 and 517.302.

COUNT 14

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about June 25, 1987 and continuing through August 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$6,600 in United States currency from Shirley Sanborn by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Shirley Sanborn, contrary to Florida Statutes 517.301 and 517.302.

COUNT 15

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about July 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Glenn Shavers d/b/a Glenn's Coins by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Glenn Shavers d/b/a Glenn's Coins, contrary to Florida Statutes 517.301 and 517.302.

COUNT 16

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about July 20, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Glenn Shavers by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Glenn Shavers, contrary to Florida Statutes 517.301 and 517.302.

COUNT 17

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about September 28, 1987 in the Sixth, Seventeenth and Nineteenth Judicial Circuits of Florida, that is: Pinellas, Broward and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Gary Duffield by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Gary Duffield, contrary to Florida Statutes 517.301 and 517.302.

COUNT 18

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about October 22, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Emilio Castillo by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Emilio Castillo, contrary to Florida Statutes 517.301 and 517.302.

COUNT 19

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about October 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Dale Gunter by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Dale Gunter, contrary to Florida Statutes 517.301 and 517.302.

COUNT 20

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about October 27, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Charlotte Benscoter by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Charlotte Benscoter, contrary to Florida Statutes 517.301 and 517.302.

COUNT 21

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about November 4, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Dennis Thompson by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Dennis Thompson, contrary to Florida Statutes 517.301 and 517.302.

COUNT 22

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about November 25, 1987 and continuing through December 23, 1987 in the Sixth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Pinellas, Indian River and Hendry Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$14,850 in United States currency from Marie Pewterbaugh by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Marie Pewterbaugh, contrary to Florida Statutes 517.301 and 517.302.

COUNT 23

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about December 15, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$6,600 in United States currency from Robert Kidd by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Robert Kidd, contrary to Florida Statutes 517.301 and 517.302.

COUNT 24

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about January 7, 1988 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$3,300 in United States currency from Glenn's Coins by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Glenn's Coins, contrary to Florida Statutes 517.301 and 517.302.

COUNT 25

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about March 10, 1988 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$9,900 in United States currency from Rose Young by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Rose Young, contrary to Florida Statutes 517.301 and 517.302.

COUNT 26

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 17, 1988 in the Sixth Judicial Circuit of Florida, that is: Pinellas County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, in connection with the offer, sale, or purchase of an investment or security, to wit: an investment contract for an interest in an FM radio station construction permit application, did unlawfully employ a device, scheme, or artifice to defraud or did unlawfully obtain money or property, to wit: \$9,900 in United States currency from Don Kirshner by means of an untrue statement of a material fact or an omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did engage in a transaction, practice, or course of business which operated as a fraud or deceit upon Don Kirshner, contrary to Florida Statutes 517.301 and 517.302.

COUNT 27

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about April 28, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to John Hood which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 28

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Myles and Rose Young which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 29

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about June 6, 1987 and continuing through November 3, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Carl Shavers which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 30

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Angela Thigpen which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 31

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 19, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Barry Shavers which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 32

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 22, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to George S. Johnson which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 33

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Madeline Sarna which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 34

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about June 25, 1987 and continuing through August 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Shirley Sanborn which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 35

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about July 6, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Glenn Shavers d/b/a Glenn's Coins which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 36

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about July 20, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Glenn Shavers which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 37

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about September 28, 1987 in the Sixth, Seventeenth and Nineteenth Judicial Circuits of Florida, that is: Pinellas, Broward and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Gary Duffield which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 38

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about October 22, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Emilio Castillo which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 39

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about October 25, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Dale Gunter which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 40

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about October 27, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Charlotte Benscoter which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 41

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about November 4, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, THOMAS L. ROOT, AND CARL W. HURLEBAUS, JR.**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Dennis Thompson which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 42

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about November 25, 1987 and continuing through December 23, 1987 in the Sixth, Nineteenth and Twentieth Judicial Circuits of Florida, that is: Pinellas, Indian River and Hendry Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Marie Pewterbaugh which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 43

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about December 15, 1987 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Robert Kidd which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 44

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about January 7, 1988 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Glenn's Coins which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 45

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about March 10, 1988 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Rose Young which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 46

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about June 17, 1988 in the Sixth Judicial Circuit of Florida, that is: Pinellas County, Florida, **RALPH M. SAVAGE, EUGENE B. WHITE, AND THOMAS L. ROOT**, did unlawfully sell or offer for sale within this state a security, to wit: an investment contract for an interest in an FM radio station construction permit application, to Rose Young which security was not registered as required by Chapter 517 of the Florida Statutes, contrary to Florida Statutes 517.07 and 517.302.

COUNT 47

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about January 1, 1988 and continuing through September 30, 1989 in the Sixth and Nineteenth Judicial Circuits of Florida, that is: Pinellas and Indian River Counties, Florida, **RALPH M. SAVAGE AND EUGENE B. WHITE**, did unlawfully engage in a scheme to defraud as defined in Florida Statute 817.034(3)(d), and did obtain property with an aggregate value of \$50,000 or more, to wit: \$50,000 or more in United States currency from the proceeds from the sale of the investment interests of others in Domestic Public Cellular Radio Telephone Service System Construction Permits, contrary to Florida Statute 817.034(4)(a) (1986 Supp.).

COUNT 48

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about January 18, 1989 in the Sixth Judicial Circuit of Florida, that is: Pinellas County, Florida, **THOMAS L. ROOT** did knowingly and unlawfully obtain or use, or endeavor to obtain or use, the property of another, to wit: United States currency in the amount of \$146,000 belonging to Canal Association, a Louisiana partnership, comprised of one or more investors from the State of Florida, with intent to either temporarily, or permanently deprive them of a right to the property or a benefit therefrom or to appropriate the property to his own use or to the use of any person not entitled thereto, and the value of said property being \$100,000 or more, contrary to Florida Statutes 812.014(1) and (2)(a).

COUNT 49

THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that beginning on or about September 1, 1988 and continuing through September 30, 1989 in the Sixth, Ninth, Thirteenth, Fifteenth and Nineteenth Judicial Circuits of Florida, that is: Pinellas, Pasco, Orange, Hillsborough, Palm Beach and Indian River Counties, Florida, **RALPH M. SAVAGE** and **THOMAS L. ROOT** did unlawfully engage in a scheme to defraud as defined in Florida Statute 817.034(3)(d), and did obtain property with an aggregate value of \$50,000 or more, to wit: \$50,000 or more in United States currency, from the sale of investment contracts for an interest in an FM radio construction permit or license to operate an FM radio station, contrary to Florida Statute 817.034(4)(a) (1986 Supp.).

COUNT 50

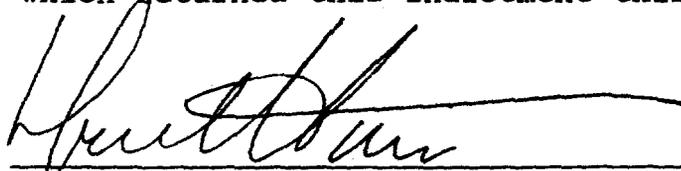
THE GRAND JURORS OF THE NINTH STATEWIDE GRAND JURY for the State of Florida, duly called, impaneled, and sworn to inquire and true presentment make, upon their oaths, do present and CHARGE that on or about July 17, 1989 in the Second and Sixth Judicial Circuits of Florida, that is: Leon and Pinellas Counties, Florida, **RALPH M. SAVAGE**, as an officer of a Florida corporation, to wit: SportsQuest, Inc. of Panama City Beach, did unlawfully issue, or sign, or endorse with intent to issue, certificates of stock in SportsQuest, Inc. of Panama City Beach or issued, signed, or endorsed with intent to issue a bond, note, bill, or other obligation or security in the name of SportsQuest, Inc. of Panama City Beach, beyond the amount authorized by law, or limited by the legal votes of such corporation or its proper officers, in violation of Florida Statute 817.20.

William D. Dando

WILLIAM D. DANDO,
Foreperson
Ninth Statewide Grand Jury of Florida

Date JAN. 9, 1991

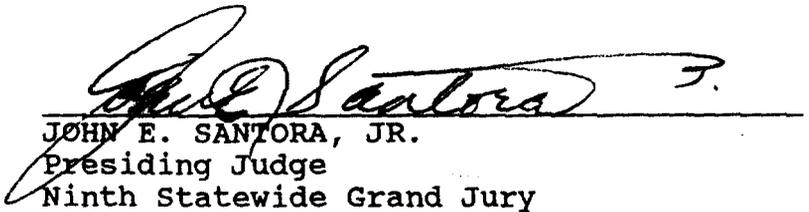
I, Melanie Ann Hines, Assistant Legal Advisor, Ninth Statewide Grand Jury, and Assistant Statewide Prosecutor for the State of Florida, hereby certify that I, as such prosecuting Officer, and as authorized and required by law have advised the Grand Jury which returned this Indictment this 9th day of January, 1991.



MELANIE ANN HINES
Assistant Legal Advisor
Ninth Statewide Grand Jury
Assistant Statewide Prosecutor

January 1991

The foregoing Indictment was returned before me in open court this 15th day of ~~August, 1990~~, and upon proper Motion of the Assistant Legal Advisor, I hereby certify and order the transfer of this Indictment to the Sixth Judicial Circuit, Pinellas County, Florida pursuant to Florida Statute 905.34.



JOHN E. SANTORA, JR.
Presiding Judge
Ninth Statewide Grand Jury

Filed in the Circuit Court, Sixth Judicial Circuit, Pinellas County, Florida this _____ day of ~~August, 1990~~.

January 1991

CLERK OF THE CIRCUIT COURT

By: _____
As Deputy Clerk