

Three Angels Broadcasting Network, Inc., and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle
Case No. 07-40098 FDS

PLAINTIFFS' SUMMARY OF DEFENDANTS' DISCOVERY REQUESTS RAISING AN ISSUE TO BE DECIDED BY THE COURT

DOCUMENT REQUEST NO.	Plaintiff-related Issues	Irrelevant subject matters	Privilege	Over-broad	Redaction Possibly Needed	Expensive Cumulative Obtainable through other sources Meant to harass, etc.
REQUEST NO. 1: <u>All minutes and other documents of the 3ABN Board for the entire length of time of 3ABN's existence, and on an ongoing basis.</u>		x		x		x
REQUEST NO. 2: <u>All minutes and other documents of all executive committee(s) of 3ABN, or subcommittee(s) of the 3ABN Board that pertain to concerns, discussions, investigations, actions, or decisions regarding any Plaintiff-related Issues, whatever is not included in Request No. 1. If less cumbersome, costly, or time-consuming for You, You may choose to produce all documents of such entities from January 1, 1991, onward for our inspection or copying.¹</u>	x	x		x		x
REQUEST NO. 3: <u>All minutes and other documents of all 3ABN departmental or division board(s), committee(s), subcommittee(s), or book committee(s), including those of</u>	x	x		x		x

¹ Note: Many of Defendants' document requests contain this last sentence (2-4, 6), but will only be addressed here, for convenience. This sentence does nothing to make the Request less cumbersome, costly or time-consuming, and Plaintiffs argue that this time-frame steps far beyond what should be a relevant time-frame, which should be approximately 2001 through January 2007, unless Defendants seek information for a specific transaction or event by identifying it with particularity.

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3ABN Books, of 3ABN Music, and of any other departments or divisions, whether domestic or foreign, that pertain to concerns, discussions, investigations, actions or decisions regarding any Plaintiff-related Issues, whatever is not already included in Requests Nos. 1 or 2. . . .						
REQUEST NO. 4: <u>All reports or correspondence, such as letters, memos, notes, electronic mail, or other communication, or other documents authored, handled, read, reviewed, sent, or received by independent contractors who are relatives of Plaintiff Shelton, or by any 3ABN officer, director, department head, employee, or key employee, or any relative, agent, or attorney thereof, whether past or present, that pertain to concerns, discussions, investigations, actions, or decisions regarding any Plaintiff-related Issues, the Defendants, Save3ABN.com, or any internet forum or other website containing concerns or criticism about one or both Plaintiffs, including but not limited to the open letters reported to be sent by Tommy Shelton or Carol Shelton to the Community Church of God in early 2007, the receipt for a pregnancy test purchased in 2004, and the trial transcript of the administrative hearing before Judge Barbara Rowe, whatever is not already included in Requests Nos. 1, 2, or 3....</u>	X	X		X		X
REQUEST NO. 5: <u>All corporate documents, including but not limited to articles of incorporation, charters, by-laws, or</u>		X		X		

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annual filings, for 3ABN as 3ABN is defined under Definitions, including the originals and all revisions thereof, including but not limited to <u>Three Angels Enterprises, LLC</u> , <u>Crossbridge Music, Inc.</u> , and all organizations related to 3ABN, including without limitation all such organizations formed in other countries, and documents identifying all 3ABN-related organization or 3ABN affiliates, whether or not consolidated, whether past or present, including without limitation 3ABN Latino, 3ABN Africa, 3ABN Australia, 3ABN Canada, 3ABN Nigeria, and 3ABN India.						
REQUEST NO. 6: All revisions of employee handbooks pertaining to 3ABN as defined under Definitions, including but not limited to those of departments or divisions, and all policies pertaining to accounting, finance, fraud, rental or sale of assets or things owned by or donated to 3ABN, and Plaintiff-related Issues. . . .		x		x		x
REQUEST NO. 7: All documents containing the 3ABN Story, all documents referencing a promised \$100,000 donation of video equipment by Hal Steenson or his church or ministry, and all documents containing public or private admissions that the promised donation never took place.		x		x		
REQUEST NO. 8: All issues of <i>3ABN World</i> (or its predecessor newsletter) and <i>Catch the Vision</i> from all years of		x		x		x

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<p><u>3ABN's existence, and issues of other periodical-type publications or catalogs from January 1, 1998, to the present, in machine readable format (PDF preferred) when extant, or in readable printed or scanned format otherwise.</u></p> <p>REQUEST NO. 9: For 3ABN as defined under Definitions, from 1998 onward, and for all years such statements were filed with any government entity or official, all financial statements, audited or not, with attached notes, supplementary information, and auditor's report, as applicable, all engagement, management, and management representation letters pertaining to auditor(s), all unredacted Form 990's or other applicable tax returns, including but not limited to those for Three Angels Enterprises, LLC, and Crossbridge Music, Inc., with all supporting schedules, statements, or forms, all documents and records which break down the figures for contributions on these documents into annual or monthly (a) amounts received in exchange for the sale of books, cassettes, videos, CD's, clothing, or other items, (b) amounts arising from charitable gift annuities or revocable trusts, (c) amounts arising from the Plaintiff Shelton or any other person (with sufficient detail to identify the amount of the coming from Plaintiff Shelton) and (d) amounts arising from contributions of other sorts, all documents that provide a basis for breaking down 3ABN income and expenses by related organization, including</p>						
		x		x	x	x

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without limitation the 3ABN Sound Center, 3ABN Music, 3ABN Books, and 3ABN organizations in foreign countries, and all documents containing all detail associated with revenue and expenses on the Form 990's, financial statements, or related documents, that are categorized as "Auto," "Bad Debt," Inventory write-down," "Contract Labor," "Contributions receivable," "Cost of goods sold," or "given away" or any variation thereof, "Credit card fees," "Interest" expense, "Love gifts," "Miscellaneous," "Music production," "noncash" contributions, "Other changes in net assets" (line 20 of Form 990), "Other" expenses, "Other revenue," "School subsidy," or "Special projects," whether or not the categories containing expenses of these types are labeled exactly this way.						
<u>REQUEST NO.10: All documents which demonstrate the reconciled differences between the financial statements and the Form 990's produced under Request No. 9, including the line items comprising Total Assets for 2003, all documents that explain the \$46,158 adjustment to net assets in 1999, that explain the \$3,387,100 investment in land booked in 2002 and the adjustment to its value in 2005, and that explain any other adjustments, all documents that explain the change in accounting for sales of all items other than "satellites" between 2003 and 2004, all documents that give the detail for securities capitalized in 2005, the schedule required by line 54</u>		x		x		x

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of the 2005 Form 990, all documents pertaining to opinions or statements regarding independent contractors displaying the characteristics of employees or vice versa, all documents detailing grants, contributions, or payments, all documents or invoices, giving detail or not, for payments made to or received from Gray Hunter Stenn LLP, or any other external auditor or firm performing auditing, accounting, or other financial services, and all documents pertaining to the dates or amounts of any cash carried overseas.						
REQUEST NO. 11: From January 1, 1999 onward, all records or other documents pertaining to contributions to 3ABN from any 3ABN director, officer, or member, whether personally or via DBA's, corporations, trusts, wills annuities, foundations, tax exempt organizations, or any other means, including without limitation records or other documents giving such detail as the amount of each contribution, to whom it was given, and the purpose of the contribution.		x			x	x
REQUEST NO. 12: From January 1, 1998, onward, for 3ABN as defined under Definitions, organized and enumerated according to the division or entity thereof, if so kept, all documents, which list open bank, investment, credit or charge accounts, which list all employees, volunteers, or independent contractors (including amounts paid), which list all affiliates and their method of accounting, which list all		x	x	x		x

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	<p><u>"disqualified persons" in accordance with Internal Revenue Service guidelines, which list all real property holdings identified by parcel number or other means, and which list all individuals who have entered accounting journals to the general ledger or any sub-ledger systems that update the general ledger activity on a regular basis, all statements for any open bank, investment, credit, or charge accounts, all documents containing charts of accounts, trial balances, account reconciliations for any balance sheet accounts, transaction level detail of gross rental income and expenses, with all associates lease agreements, and transaction level detail of inventory and cost of good sold (or "cost of goods given away" or variation thereof) accounts, all disbursement account and payroll account check registers. All documents pertaining to lists of fixed assets, including without limitation documents giving such detail as asset number, cost, accumulated depreciation, net book value, and physical location, all documents giving explanations for the transactional flows through inventory and fixed asset accounts as a result of annual physical counts and inspections, or documenting that such annual counts or inspections took place, all invoices for legal, investigative, or surveillance expenses, whether or not explicitly stated to be such on the invoice, all documents listing all split interest agreements, including details of their annual valuation adjustment, all</u></p>					

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documents pertaining to lists of vendors, including without limitation documents giving such detail as vendor name, vendor number, and amount paid by year, all documents pertaining to warehousing, inventorying, or fulfillment services either performed for individuals or entities other than 3ABN or concerning products that 3ABN does not own, and all documents identifying CD's of which Plaintiff Shelton is the producer. If less cumbersome, costly, or time-consuming for You, You may choose to produce all accounting records from January 1, 1998, onward for our inspection or copying.						
REQUEST NO. 13: All email, correspondence, letters, reports, communications of any type recorded by any device, and all other documents from D. Michael Riva, Tim Neubauer, Nicholas Miller, Garrett L. Boehm, Fierst, Pucci & Kane, LLC, Siegel, Brill, Greupner, Duffy & Foster, P.A., or any other attorney or law firm, including without limitation those which have represented either Plaintiff in any matter since January 1, 2002, identifying the results or review of any audits or investigations, which either give or decline to give a clean bill of health, including without limitation all supporting reports or other documents upon which these law firms or attorneys may have relied.		x	x			x
REQUEST NO. 15: All email, correspondence, recordings, records or recordings of telephone conversations,					x	x

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or other documents that support or do not support the claim that how Seventh-day Adventist church leaders view 3ABN has been negatively impacted by the Defendants or Save3ABN.com, or the claim that church leaders have refused to hear the side of the Plaintiffs, <u>including without limitation documents giving such detail as the name, address, and telephone number of each such church leader, and the date of any such contact.</u>						
REQUEST NO. 16: From January 1, 2000, onward, all email, correspondence, recordings, records or recordings of telephone conversations, or other documents pertaining to donors who have reduced or stopped giving, including without limitation documents giving such detail as the names, addresses, and telephone numbers of all such donors, the sums they stopped giving, the reason(s) they stopped giving, and the documented sums given each year for the previous seven years along with the intended purpose each gift was for.		X		X	X	X
REQUEST NO. 17: Whether concerning annuities or trusts negotiated or managed by the 3ABN Trust Department or its personnel, <u>all documents describing or listing all charitable gift annuities by state of origin, copies of all required state registrations, the trust services log(s) recording trust services activity since January 1, 2000, all documents for charitable gift annuities originating in the state of Washington or naming</u>		X	X	X	X	X

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<u>Lottie Wiedermann as an annuitant, all invoices paid to Westphal Law Group or Lunsford & Westphal, the trust file of May Chung, and all trust office reports submitted to the corporate office.</u>						
<u>REQUEST NO. 18: All documents pertaining to the accounting procedures, policies (whether written or in practice), usage, or scheduling of the 3ABN Sound Center, . . .</u>		x				
<u>REQUEST NO. 19: All documents pertaining to items buried on 3ABN property, other than electrical, plumbing, sewer, foundation, heating, or cooling, and all invoices, check copies, or other documents associated with the building of the school, gymnasium, and Angel Lane.</u>		x		x		
<u>REQUEST NO. 21: All records or other documents pertaining to reimbursements, or copies of check stubs reimbursing 3ABN, for the cost of legal, investigative, or surveillance expenses incurred since January 1, 2003, including without limitation the examples listed under Plaintiff-related Issue "e."</u>	x	x	x			
<u>REQUEST NO. 22: All invoices or other documents concerning purchases of books or other items sold, manufactured, authored, produced, patented, inventoried, or copyrighted by any officer, director, employee, key employee, or independent contractor of 3ABN, or relative thereof, or relative of Plaintiff Shelton, whether purchased from that/those</u>		x		x		x

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individual(s), D & L Publishing, DLS Publishing, Remnant Publications, Pacific Press, Media Opportunities IPTV, or any other individual or entity, and all editions and translations of <i>Ten Commandments Twice Removed</i> , including but not limited to that of the first printing.						
REQUEST NO. 23: All records or other documents pertaining to 3ABN eBav.com sales, and to sales to any 3ABN director, officer, independent contractor, employee, or key employee, or any relative thereof, of any donated or purchased items or assets, identifying the donors of (if a donated item or asset) and recipients or buyers of such items or assets, or containing a description of reasonable particularity of such items or assets, or the appraised or recorded value or original price paid or final sales price (whichever of these are applicable to a particular case) of such items or assets, items or assets including but not limited to the piano that sold in 1998 for \$2,000, and any antiques purchased by Shelley Quinn, and all documents pertaining to the calculation of the final sales price for the house sold to Plaintiff Shelton in 1998 as well as proof of payment for that house.		x		x	x	x
REQUEST NO. 24: All documents pertaining to statements made by Tommy Shelton, Plaintiff Shelton, or their relatives that relate to care for high blood pressure, heart disease, or		x				x

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any other ailment, but only in regards to ailments attributed to <u>allegations made against either Tommy Shelton or Plaintiff Shelton</u> , including but not limited to all documents pertaining to reimbursement or payment for expenses resulting from or in connection to such ailments.						
REQUEST NO. 25: All documents pertaining to assets or cash donated or sold [below fair market value to government entities, including without limitation] to towns, cities, and schools.		x		x		
REQUEST NO. 26: All documents containing financial information or data not already enumerated that concern any Plaintiff-related Issue, and all documents not yet produced that would be produced in response to any of the above requests (including without limitation Request No. 9) if the end-of-year reports and audits for the current fiscal year were already completed.	x	x		x		
REQUEST NO. 27: All types of phone records or other documents enumerating phone calls made by 3ABN officers from January 1, 2003, onward, whether printed or not, whether detailed or not, whether paid for or reimbursed by 3ABN or not, whether 3ABN is the account holder or not, indexed as to caller or account holder or account, and anything pertaining to discussions, investigation, or decisions regarding these records and documents, or fraction thereof, whatever is not already included in Requests Nos. 1 through 26.		x		x		x

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REQUEST NO. 28: All documents describing the <u>relationship between 3ABN and the Seventh-day Adventist Church and its various entities, including but not limited to the compensation John Lomacang receives directly or indirectly from 3ABN, all documents establishing Mollie Steenson's membership of and length of tenure on the Executive Committee of the Illinois Conference of Seventh-day Adventists, and all documents consisting of communications, letters, memos, emails, agendas, or minutes arising from this relationship pertaining to Thompsonville Christian School, any other Seventh-day Adventist elementary school, or any campus of Broadview Academy, in regards to sexual misconduct or child molestation allegations, and the presence of any registered or convicted sex offenders on the campus of 3ABN.</u>		x		x		x
REQUEST NO. 29: <u>All contributions of text or dialogue, including but not limited to postings, publications, messages, or notes, that any director, officer, employee, key employee, independent contractor, or any relative or agent thereof (including but not limited to Gregory Scott Thompson, Ronnie Shelton, or Teresa Shelton) has made to any internet website, including but not limited to any chat-room, private or public discussion forum, blog, or bulletin board, including ClubAdventist.com, AdventistForum.com, BlackSDA.com, Maritime-SDA-Online.org, or</u>	x	x		x		x

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<u>ChristianForums.com, or any other website containing discussion about 3ABN, Plaintiff Shelton, the Defendants, Linda Shelton, Save3ABN.com, this litigation, any Plaintiff-related Issue, or any individual involved in any Plaintiff-related Issue, and any reports made by, record of payments made to, or correspondence to and from such individuals, whether direct or indirect, that are related in any way to any such contribution they have made to any such site.</u>	x	x				
<u>REQUEST NO. 31: Requests information "concerning the subject matter of . . . any Plaintiff-related Issue."</u>		x				
<u>REQUEST NO. 32: All documents, including but not limited to documents pertaining to agreements, discussions, meetings, or minutes of meetings, regarding the anticipated merger with Amazing Facts, whether past or present, including suggestions, ideas, plans, or decisions about a constituency, and ASI or the McNeilus family's involvement with any aspect therewith.</u>		x				
<u>REQUEST NO. 33: All applications filed with the Federal Communications Commission, and all correspondence and documents pertaining to those applications and to the decisions made regarding those applications, all documents pertaining to the purchase or sale of television or radio stations, including without limitation board actions if not already produced, and all documents pertaining to the permit acquired by Yoneide</u>		x		x		x

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<u>Dinzey for K16E1 (later called KYUM) and to its sale to 3ABN by Yoneide Dinzey and then by 3ABN to Tiger Eye Broadcasting.</u>	x	x				
<u>REQUEST NO. 34: All photographs (digital or film), slides, videotapes, films, moving pictures, DVD's, CD's, CD-ROM., MP3' s, cassettes, or other types of audio or video representations in Your possession pertaining to the 3ABN Story, to the instant dispute, to Plaintiff-related Issues, to the Defendants, to Save3ABN.com, to any internet forum or other website containing concerns or criticism about one or both Plaintiffs, or to allegations made against Linda Shelton since January 1, 2004, whether prior or after her dismissal, including but not limited to any photographs of a watch or watches, certain camp meeting broadcasts of May 2004, 3ABN Today LIVE broadcasts of August 10 and December 31, 2006, and February 15, 2007 (to ensure that Defendants' copies and Plaintiffs' copies are identical), any and all recordings of phone conversations of Linda Shelton or Arild Abrahamsen, any and all audio- or video-recorded evidence against Linda Shelton, including but not limited to the audio recording referred to by Hal Steenson, Plaintiff Shelton, and Harold Lance, and the video recording referred to by Kenneth Denslow on October 23, 2006, all documents referring to such audio and video recordings or the individuals who saw or heard them, all broadcasts in which Linda Shelton referred to a newfound</u>	x	x		x		x

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<u>friend or sent anyone secret messages, all broadcasts in which any allegations pertaining to Plaintiff-related Issues were referred to explicitly or through innuendo, and any broadcasts or recordings that will be used for the Plaintiff's case.</u>						
REQUEST NO. 35: <u>Unredacted copies of all emails or other documents attached to the Affidavit of Mollie Steenson of May 9, 2007....</u>		x			x	x
REQUEST NO. 37: <u>From January 1, 1998, onward, all corporation documents, including the originals and all revisions thereof, including but not limited to articles of incorporation, charters, by-laws, or annual filings, for any organizations over which You exercised control except for 3ABN, including without limitation DLS Publishing, and all minutes and other documents of the boards or committees of any such organizations.</u>		x		x		x
REQUEST NO. 38: <u>From January 1, 1998, onward, for Plaintiff Shelton, D & L Publishing, DLS Publishing, or any DBA or corporation over which you have exercised control (other than 3ABN), all financial statements, all tax returns (including all required or filed forms, schedules, and worksheets), all financial and accounting records, all bank statements or records (including without limitation statements or records for any investment accounts, savings accounts, or</u>		x		x		x

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<u>insurance accounts, or any other accounts which give such detail as amount(s) deposited or withdrawn, or an ongoing statement of value), and all credit or charge account statements or records (including without limitation statements or records for any credit cards, charge cards, loans, mortgages, or collateral arrangements, or any other statements or records which give such detail as amount(s) withdrawn, purchase(s) or payment(s) made, or an ongoing statement of amount owed).</u>						
REQUEST NO. 39: All proofs of payment for the house You purchased from 3ABN in 1998, all proofs of receipt or payment of the loans or mortgages You acquired from Merlin Fiarli or the Fjarli Foundation, and that You gave to Jim Gilley, and all proofs of payment to 3ABN for any services or merchandise 3ABN has, whether directly or indirectly, paid on Your behalf or given to You.		x				x
REQUEST NO 40: All documents containing or pertaining to evidence of Linda Shelton's adultery, whether "spiritual" or physical, including without limitation audio or video recordings, phone records of any sort (whether printed or handwritten or otherwise), correspondence, letters, and email.		x		x		

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REQUEST NO. 41: <u>All documents pertaining to the child molestation and sexual misconduct allegations against Tommy Shelton.</u>		X		X	X	X
REQUEST NO. 42: <u>From January 1, 1998, onward, all documents pertaining to any items or assets previously donated to or owned by 3ABN that are or were subsequently in the possession of You or one of Your relatives.</u>		X		X		
REQUEST NO. 43: <u>All invoices or other documents regarding materials or labor pertaining to any home you have lived in since 3ABN was founded.</u>		X		X		X
REQUEST NO. 44: <u>All emails authored or received by, or identified by email headers as "From" or "To" Plaintiff Shelton, not subject to attorney-client privilege, including without limitation those generated from any computer used by Plaintiff Shelton, whether such computer be in a 3ABN or home office, or whether it be any of the laptops that he has owned since 1999, or whether it be any other computer, regardless of from what user names or accounts such emails were generated, including without limitation any EarthLink account, that were sent to or received from any 3ABN officer, director, employee, volunteer, viewer, supporter, or detractor, or any ASI officer or director, or any relative of Plaintiff</u>	X	X		X	X	X

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Shelton, or any other person not otherwise included herein, that pertain to any Plaintiff-related issue, the Defendants, or the subject matter of the instant dispute, or that do or do not support the position or positions of the Plaintiffs.						
<p>Subpoena Served On Remnant Publishing: For the time period January 1, 2000 to present: All contracts, agreements, records, transmittals, invoices, correspondence (including but not limited to memos, letters, emails (electronic or otherwise), faxes, and recorded conversations), or other documents known or believed to be pertaining to any of the following individuals or entities [defined below].</p> <p>All ledgers, journals, records of accounts, transmittals, invoices, or other documents relating to direct or indirect payments known or believed to be made to or on behalf of, or received from or on behalf of any of the following individuals or entities.</p> <p>All records of money known or believed to be held or to have been held for any of the following individuals or entities. [Note: this request is unclear]</p> <p>All bank statements for any accounts which any of the</p>		x		x	x	x
		x		x	x	
		x		x	x	

Three Angels Broadcasting Network, Inc., and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle
Case No. 07-40098 FDS

PLAINTIFFS' SUMMARY OF DEFENDANTS' DISCOVERY REQUESTS RAISING AN ISSUE TO BE DECIDED BY THE COURT

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<p><u>following individuals or entities had funds maintained in, paid into, were paid from, or had access to, whether by ATM card, by being a signatory, or by any other means, including but not limited to any such accounts at Century Bank and Trust; and records of when any such accounts were established, and of all who have been signatories on those accounts.</u></p> <p><u>All manuscripts or works in progress known or believed to be about, owned by, authored by, or under the control of any of the following individuals and entities, including but not limited to manuscripts or works in progress that pertain to books, pamphlets, tracts, audio or video recordings, or other digital recordings.</u></p> <p><u>All documents pertaining to royalties attributed to works known or believed to be owned by, authored by, or under the control of any of the following individuals and entities, including without limitation <i>The Antichrist Agenda</i> and <i>The Ten Commandments Twice Removed</i>, and any translations thereof, or pertaining to royalties paid directly or indirectly to D&L Publishing, DLS Publishing, Danny Shelton, or one of his relatives.</u></p> <p>Individuals and entities =</p>		x		x	x	
		x		x		x
				x		

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- <u>Three Angels Broadcasting Network, Inc. and all organizations known or believed to be related to it or controlled by it, and all names known or believed to be assumed by it, whether past or present, whether for profit or non-profit, including but not limited to: Three Angels Broadcasting, Inc., Three Angles Broadcasting, Inc., Three Angel's Broadcasting School, Inc., Three Angels TV & Communications Service, Inc., Three Angels TV & Radio Broadcasting Network (in Russia), Tres Anjos Broadcasting Network - LTDA (in Brazil), Association Three Angels Broadcasting Network (in Peru), 3ABN, 3ABN Philippines, Inc., Three Angels Enterprises, L.L.C., Crossbridge Music, Inc., 3ABN Books, 3ABN Music, or 3ABN Radio.</u>		x		x		x
- <u>All individuals known or believed to be officers, directors, employees, volunteers, or agents of Three Angels Broadcasting Network, Inc. during the relevant time period, whether still in that capacity or not, including but not limited to: David E. Carson, Larry Ewing, Danny Lee Shelton, Linda Sue Shelton, Brandy/Brandi Elswick/Marry/Shelton, Mollie Steenson, May E. Chung, J.Wayne Coulter, Kenneth Denslow, Merlin Fjarli, Dr. Robert Ford,</u>		x		x		x

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<p><u>James W. Gilley, Willilam (Bill) Hulsey, Ellsworth McKee, Garwin McNeilus, Nicholas Miller, Wintley Phipps, Larry Romrell, Stan Smith, G. Ralph Thompson, Dr. Walter Thompson, Max Trevino, Carmelita Troy, Owen Troy, and Larry Welch.</u></p> <p>- <u>Any DBA's of Danny Lee Shelton, or any organizations over which he is known or believed to have had control, including but not limited to D & L Publishing and DLS Publishing, and any individuals known or believed to be directors, officers, employees, or volunteers of the same.</u></p>		x		x		x
<p><u>Subpoena Served on Gray Hunter Stenn, LLP (S.D.III.)</u></p> <p>- <u>All contracts, agreements, work papers, engagement letters, management letters, management representation letters, or other documents arising from any auditing services rendered to 3ABN, as defined herein.</u></p> <p>- <u>All contracts agreements, tax returns, invoices, records of payments made or received whether direct or indirect, or any other accounting records or documents arising from any accounting or tax form preparation service rendered to 3ABN, as defined herein.</u></p>		x		x	x	x

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- <u>All contracts, agreements, work papers, engagement letters, management letters, management representation letters, or other documents arising from any auditing services rendered to Danny Shelton, as defined herein.</u>		x		x		x
- <u>All contracts, tax returns, invoices, records of payments made or received, whether direct or indirect, or any other accounting records or documents arising from any accounting or tax form preparation services rendered to Danny Shelton, as defined herein.</u>		x		x	x	x
3ABN is defined as: - <u>Three Angels Broadcasting Network, Inc., and all its related organizations or organizations which it controls, and their assumed names, whether past or present, whether for profit or non-profit, including but not limited to: Three Angels Broadcasting Inc., Three Angel's Broadcasting School, Inc., Broadcast Communications Service, Inc., Three Angels TV & Radio Broadcasting Network (in Russia), Tres Anjos Broadcasting Network - LTDA (in Brazil), Association Three Angels Broadcasting Network (in Peru), 3ABN, 3ABN Philippines, Inc., Three Angels Enterprises, L.L.C., Crossbridge Music, Inc., 3ABN</u>		x		x		x

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<u>Books, 3ABN Music, or 3ABN Radio.</u> Danny Shelton is defined as: - Danny Lee Shelton, and any of his DBA's or organizations over which he has or has had control, including but not limited to D & L Publishing and DLS Publishing.		x		x		x
<u>Subpoena Served on MidCountry Bank (D.Minn.)</u> All monthly statements from January 1, 1998, onward to the present, for any account of any type owned by, held in trust for, or for whom any of the following were signatories, for whatever months or parts thereof such was true: Danny Lee Shelton (or Danny Shelton) of West Frankfort or Thompsonville, Illinois, D & L Publishing (probably a DBA), DLS Publishing (incorporated in Nov. 2004), or Crossbridge Music, Inc. (incorporated in Nov. 2002).		x		x	x	x
<u>Subpoena Served on Century Bank (C.D.Mass.)</u> All monthly statements, deposit slips or copies thereof, and checks or copies thereof from January 1, 2003, onward to the present, for any account owned by, held in trust for, or for whom any of the following were signatories, for whatever months or parts thereof such was true: Danny Lee Shelton, D & L Publishing, DLS Publishing, Three Angels		x		x	x	x

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<u>Broadcasting Network, Inc., Three Angel's Broadcasting School, Inc., Broadcast Communications Service, Inc., Crossbridge Music, Inc., Three Angels Enterprises, L.L.C., 3ABN, 3ABN Books, or any assumed name or name of a subsidiary of Three Angels Broadcasting Network, Inc. that includes the word "3ABN" or the words "Three Angels."</u> <u>Subpoena Served on Kathi Bottomley (C.D.Cal.):</u> 1. Copies of correspondence, notes, faxes, emails, communications of any type, recordings, audio or video recordings, other electronic media, or any other documents that are authored by, sent to, received by, or handled by yourself, which were compiled, briefed, or summarized for, or otherwise disseminated to Walter Thompson, Danny Shelton, or Mollie Steenson, pertaining to: (a) Unfair dealings of breach of trust relating to trust and annuity beneficiaries (b) Discrimination and/or retaliation by departmental management; (c) Any other complaints regarding the 3ABN Trust Services Department or its management; and (d) Your termination and subsequent appeal to the 3ABN Board. 2. Copies of correspondence, notes, faxes, emails,		x		x	x	x

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communications or reports of any type, recordings, audio or video recordings, other electronic media, or any other documents that are authored by, sent to, received by, or handled by yourself, which were compiled, briefed, or summarized for, or otherwise disseminated to the <u>California Department of Fair Housing and employment, the Internal Revenue Service, and the federal Equal Employment Opportunity Commission, or any of their investigators since March 2006.</u>		x		x	x	x
3. Copies of correspondence, notes, faxes, emails, communications or reports of any type, recordings, audio or video recordings, other electronic media, or any other documents pertaining to perceived or real unethical, questionable, or illegal practices perpetrated by the <u>3ABN Trust Services Department, 3ABN Finance Department, or 3ABN Administration, and/or copies of any wills, annuities, stewardship instruments, or trusts written or altered by or on behalf of those departments that would or could be perceived or considered unethical, questionable, or illegal, according to the community, regulatory, or statutory standards such practices or agreements would ordinarily be subject to.</u>		x		x	x	x

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<p><u>Subpoena Served on Glenn Dryden (W.Va.)</u></p> <p>1. Pictorial representations, including without limitation video recordings (preferably DVD's), of Tommy Shelton at a grand piano (which he took with him when he left) at the Community Church of God that depict sufficient detail to properly identify or assess its make, model, age and condition.</p> <p>2. Copies of correspondence, notes, communications of any type, claim statements, claim forms, recordings, audio or video recordings, or any other documents that are authored by, sent to, received by, or handled by yourself, or any officers, directors, or attendees of your congregation, whether past or present, or any person or interest, <u>potential claimant, claimant, or alleged victim of Tommy Shelton, or any insurance carrier you have had, including without limitation Brotherhood Mutual Insurance Company, and that pertain to any misconduct, sexual or otherwise, by Tommy Shelton.</u></p> <p>3. Copies of correspondence, notes, communications of any type, claim statements, claim forms, recordings, audio or video recordings, or any other documents that are authored by, sent to, received by,</p>		x		x		x

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or handled by yourself, or any officers, directors, or attendees of your congregation, whether past or present, or any credentials committee on the equivalent or members thereof, and that pertain to the reasons, whether official or unofficial, for Tommy Shelton's ceasing to serve as the pastor or your congregation, that pertain to any investigations into his conduct, or that pertain to the considered or actual suspension or revocation of his ordination or license.		x				x
4. Copies of correspondence, notes, communications of any type, claim statements, claim forms, recordings, audio or video recordings, or any other documents that are authored by, sent to, received by, or handled by yourself, or any officers, directors, or attendees of your congregation, whether past or present, that pertain to threats of litigation or other forms of intimidation by Danny Shelton, Tommy Shelton, any of their relatives, 3ABN or any of its directors, officers, employees, or personnel, or attorneys representing 3ABN or any of these individuals.		x		x		x

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Nov 20 2006, 09:25 AM

Post #114

Advanced Member



Group: Members

Posts: 155

Joined: 13-November 05

From: Upper Midwest

Member No.: 1,417

Gender: f

I read this post over at Maritime. It is in reference to whether or not Linda Shelton will ever be exonerated. Gallon Joy is the author of the following letter:

Linda and the team that has been investigating the entire 3ABN case has been conferring with a representative of ASI to determine if common ground and fair rules for a five person panel can be found to address at least some of the issues, including Linda's claims and rights.

If this does not work out, then in Janaury, 2007 we will launch a full scale and public effort to exonerate Linda, to indict Danny in the public eye and to put pressure on 3ABN to make certain changes to it's governance and accountability to be certain that this incredulous process cannot continue or repeat itself.

In the interim, think seriously of encouraging local affiliates and individual satellite viewers to switch to Hope Channel. They also offer online streaming video and I have begun watching it to avoid supporting hypocrisy and to avoid what may be an unpleasant surprise as civil authority continues to probe as well.

I have done a very complete timeline and continue to interview dozens of witnesses, officers, directors (past and present), employees and conference employees.

I can safely argue that we have overwhelmingly concluded that there was no adultery on Linda's part during her marriage to Danny Shelton;

That Danny was in fact preparing for a divorce during 2003 and Linda trustingly and naively missed the roadsigns;

That Danny has had several "inappropriate" relationships that were in some cases public and known by staff and some directors throughout his marriage to Linda Shelton;

That at least one "inappropriate" relationship in fact betrayed Linda Shelton and has used her treachery to advance her career at 3ABN and continues to do so;

That Danny Shelton clearly conducted an "inappropriate" relationship with Brandy from August 2004 until they were married in 2006 and the officers

EXHIBIT

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and directors of 3ABN were well aware of the relationship;

That the marriage to Brandy is a clear adultery under the very clear rules established by the Lord of the Universe in Matthew; That the 3ABN board had no ecclesiastical authority to authorize the adulterous marriage to Brandy and continue to employ Danny Shelton at the head of Three Angels Broadcasting Network, Inc.;

That the board of Directors of 3ABN has failed in it's responsibility to oversee the assets, governance and accountability to the "stockholders in the pews";

That 3ABN has to change it's constitution and bylaws to end the self perpetuation of the board of directors and leadership of 3ABN and to establish a real membership inclusive of all donors,

To establish representative form of government that will be accountable to the "stockholders in the pews", that will act responsibly to end the nepotism at 3ABN and prevent re-enactment of the Linda Shelton debacle and the retaliation against a whistleblower employee group from trust services following egggregious actions, including but not limited to grossly disgusting violations of the Federal Equal Employment Opportunity Act and some allegations of wrongful fiduciary responsibility by Westphal, et al.

As time progresses, either the tribunal will conduct a fair hearing and issue a report with recommendations or we will do it for them. Ours will most likely be far less tempered and far more direct in it's revelations and public documentation, but we are willing to grant some additional time for these discussions to prepare a foundation for a fair tribunal. But, our investigation is coming to a time certain waymark conclusion, albeit not an end as there are developing stories that will most certainly proceed well into the year 2007 and 2008.

While I am a firm believer in ecclesiastical authority, I am reasonably certain that no-one on this team, nor other 3ABN employees, past and present, will allow the issues to once again remain buried for another twenty years.

Rest assured that Linda will be exonerated publically in time!!! The handwriting is very nearly upon the wall and grace will end in the favor of justice. After all, Divine Love is a balance of mercy and justice and mercy has had it's way far too long at 3ABN. May Justice prevail and the Lord be honored in all that is done.

Gailon Arthur Joy

AUReporter

gailon

From: gailon [gailon@gabbjoy4.com]
Sent: Tuesday, January 22, 2008 11:12 PM
To: 'Bob'
Cc: 'isa@glow.cc'
Subject: RE: [Fwd: Re: Post on MaritimeSDA re bankruptcy & save3ABN sites]

I just cannot even speculate what Watchbird thinks she knows, but it is
 A regular tactic that is usually much-a-do about nothing.

I did recently answer questions regarding my decision to non-renew my
 Ownership of the save3ABN.com and save3ABN.org domains and
 Will be happy to share these:

They are well past two years in the *total* investigation.... but at about two
 years was when they took the investigation to a new level... and it was from this
 point that my information said one could expect about two years. I think when all
 is said and done, you will look back and be glad that they got to the things they
 did just ahead of you.

I have no special information that causes me to say that last...
 but I think you will do well to keep "dragging your feet"...
 albeit working on every thing "your hand findeth to do"... God has His timing
 set... and He very often looks very "slow" in our eyes. But there are things that
 yet need to be discovered...
 and there may be a great deal of advantage to you if the "big boys" discover them
 first.

Blessings,

Bille

At 10:28 PM 1/20/2008 -0500, gailon wrote:

>Unfortunately, because of the very narrow charges pressed by 3ABN and
 >Danny Lee Shelton, we must substantially expand the case to bring in
 >the most damaging and certain to sway the jury details. I have
 >deliberately dragged My feet hoping the IRS would move a bit quicker
 >and finish their investigation before we would have to become extremely
 >aggressive.
 >It also conserved badly needed cash, but D-day H-hour is just ahead And
 >we cannot afford to delay further.
 >
 >Remember the IRS has already been investigating for nearly eighteen
 >months that we are aware of and given the complaint from Fran, I would
 >guess that They are well past two years into the investigation.
 >Further, they have been taking affidavits from the prior witness list
 >and have done many private statement interviews in the field, including
 >grabbing key evidence we were requesting before it was delivered, such
 >as the tape back-up of Linda Shelton's hard drive. They clearly have
 >been getting information that we had the exclusive on and jumping us at every
 >opportunity. C'est la vie.
 >
 >
 >Gailon Arthur Joy

1/20/2008

