

Ex. B

1354 County Highway 21
Halstad, MN 56548
(218) 456-2568
March 13, 2008

Daniel Hall, Secretary-Treasurer
Remnant Publications
649 E. Chicago Road
Coldwater, MI 49036

Dear Dan:

I really appreciate Dwight's assurance that Remnant would not make it difficult for us to obtain the necessary documents we need to defend ourselves.

Paragraphs 46g and 46h of Danny Shelton and 3ABN's complaint against us state:

g. 3ABN Board members have personally enriched themselves as officers and directors of 3ABN in violation of the Internal Revenue Code.

h. Danny Shelton wrongfully withheld book royalties from 3ABN and refused to disclose those royalties in proceedings before a court of law related to the distribution of marital assets.

Attorney Bappert told me that his position was that information from Remnant regarding how much royalties Danny Shelton was paid was irrelevant to the lawsuit against us. In light of the above quotes, his position is untenable.

Additionally, when a party in a suit puts at issue matters that are normally privileged, their rights of privilege are thereby waived.

Attorney Bappert also informed us that we would need to file a motion to compel before Remnant would produce any documents whatsoever. We have accordingly opened up a miscellaneous case there in Michigan for that purpose, though we would hope that such a proceeding would be unnecessary, since Federal Rule of Civil Procedure 37(a)(5)(A) may authorize the payment of the expenses we would incur in so doing.

To avoid any expense to Remnant, unless you have another suggestion, we would plan on providing our own equipment to copy the requested materials, and would do our own copying. We would need at your earliest convenience the types of materials we are talking about so that we can make sure we have the right equipment and blank media.

As a reminder from our last letter, multiple sources informed us that Danny Shelton was trying to hide his Remnant *Ten Commandments Twice Removed* earnings from his board members, and

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that there was a secret account which contained those earnings.

I would be happy to inspect and copy the requested documents at Remnant or to have you forward copies of them to me by mail or electronically as we discussed earlier. However, if you prefer, I have reserved Conference Room 1 at the Branch County Courthouse, 31 Division St., Coldwater, for our use on April 15, 2008, at 8:30 am. Conference Room 1 is on the second floor. After leaving the elevator take a right, and the conference room is on the left.

Sincerely,

A handwritten signature in black ink that reads "Bob Pickle". The signature is written in a cursive, slightly slanted style.

Bob Pickle, *pro se*

Gailon Arthur Joy, *pro se*

cc: Charles Bappert

AO88 (Rev. 12/06 - WDMI 12/07) Subpoena in a Civil Case

Issued by the
UNITED STATES DISTRICT COURT

Western
 Three Angels Broadcasting Network,
 Inc., and Danny Lee Shelton, I

DISTRICT OF Michigan

SUBPOENA IN A CIVIL CASE

Gailon Arthur Joy and Robert
 Pickle

Case Number:¹ 07-40098-FDS
 District of Massachusetts

TO: Daniel Hall or keeper of the
 records at Remnant Publications,
 greetings!

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
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YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Exhibit A

PLACE <u>Conference Room 1, Second Floor, Branch County Courthouse, 31 Division Street, Coldwater, MI 49036</u>	DATE AND TIME <u>4/15/08 8:30am</u>
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YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)  <u>DEPUTY CLERK</u>	DATE <u>JAN 11 2008</u>
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ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Ronald C. Weston, Sr.
 Clerk U. S. District Court
 110 Michigan St. N. W.
 Grand Rapids, MI 49503
(See Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

EXHIBIT A

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified:

For the time period of January 1, 2000, or the first date Remnant Publications performed publishing or printing services for Danny Shelton or the following entities, whichever is later, onward to the present day:

- 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.
- 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.
- All records of money known or believed to be held or to have been held for any of the following individuals or entities.
- All bank statements for any accounts which any of the 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.
- 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.
- 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 *The Antichrist Agenda* and *The Ten Commandments Twice Removed*, 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.

Individuals and entities:

- 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., 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 Books, 3ABN Music, or 3ABN Radio.
- 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/Murray/Shelton,

Mollie Steenson, May E. Chung, J. Wayne Coulter, Kenneth Denslow, Merlin Fjarli, Dr. Robert Ford, James W. Gilley, William (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.

- Any DBA's of Danny Lee Shelton, or any organizations over which he is known or believed to have or 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.

Definitions:

- **You** or **Your** means Remnant Publications, Dwight Hall, president, or Daniel Hall, vice-president, secretary, or treasurer.
- **Or** is used in the inclusive sense (i.e. "and/or"). Thus, if a request seeks all documents relating to "A or B," You are to produce all documents relating to "A," all documents relating to "B," and all documents relating to "A and B."
- **Employee** means anyone known or believed to have performed services for Three Angels Broadcasting Network, Inc. at any time from January 1, 2000, onward to the present, whether paid or not, over which 3ABN exercised the typical control of an employer-employee relationship, including but not limited to the dictation of the way or manner, or the time and place where those services must be performed.
- **Document** shall have the broadest possible meaning permitted under applicable law, and shall include any written, recorded or graphic material of any kind, including the originals and all non-identical copies, including those materials in electronic form, that is or has been in Your possession, control or custody or of which You have knowledge.

Instructions:

- If any document requested herein was at one time in existence but has been lost, discarded or destroyed, identify such document as completely as possible, providing as much of the following information as possible:
 1. the type of document;
 2. the document's date;
 3. the date or approximate date the document was lost, discarded or destroyed;
 4. the circumstances under which and the manner in which the document was lost, discarded or destroyed;
 5. the reason or reasons for disposing of the document (if discarded or destroyed);
 6. the identity of all persons authorized or having knowledge of the circumstances surrounding disposal of the document;
 7. the identity of the person(s) who lost, discarded, or destroyed the document; and
 8. the identity of all persons having knowledge of the contents of the document.