

Ex. A
Ex. CC [**(A-I)**

[Exhibit A for the Motion to Quash from the District of Minnesota is attached to the instant Motion to Compel as **Exhibit X.**]

Ex. B

[Exhibit B for the Motion to Quash from the District of Minnesota consists of the first 10 pages of what is attached to the instant Motion to Compel as **Exhibit T.]**

MIDCOUNTRY BANK

Ex. C

December 11, 2007

Gailon Arthur Joy
Robert Pickle

████████████████████
Halstad, MN 56548

RE: Subpoena for:
Case N. 07-40098-FDS
Three Angels Broadcasting and Danny Shelton

Dear Sirs,

MidCountry Bank charges the following fees for research and copies:

Photo Copies –	\$0.25 / page
Research	\$30.00 / hour
Archived Copies*	\$5.00 / statement

* documents prior to May 2005
Payment in advance is required.

An estimate of copies and time involved in pulling documents over the required time frame of January 1, 1998 to present, along with shipping, could exceed \$10,000.00. The amount of time required to research and retrieve these documents will take approximately four months. All documents prior to May 2005 are stored on Micro fiche and film. To retrieve them is a very manual and time consuming process. If you can reduce the time window, the type of accounts and/or documents, this could significantly reduce the cost and time.

Additionally, based on this volume of required documents, we will not be able to retrieve all documents by the commanded time of January 10, 2008 and would require an extension to March 10, 2008.

Please respond in writing and let me know how you would like us to proceed.

Please feel free to call me if you have any questions or if I can be of further assistance.

Sincerely,

Deborah Nielsen
MidCountry Bank
Deposit Administration
952-843-5222 (direct)
952-697-2074 (fax)



MIDCOUNTRY BANK

Ex. D

Gailon Arthur Joy
Robert Pickle

February 4, 2008

Revised

[Redacted]
Halstad, MN 56548

RE: Subpoena for:
Case N. 07-40098
Three Angels Broadcasting and Danny Shelton

Dear Sirs,

MidCountry Bank charges the following fees for research and copies:

Photo Copies -	\$0.25 / page
Research	\$30.00 / hour
Archived Copies* (* documents prior to May 2005)	\$5.00 / statement

Payment in advance is required.

\$2,615.00 total statements x \$5.00 each pre conversion
 \$ 42.50 number of statements x 2 pages for each @ \$0.25/each post conversion
 \$ 720.00 24 hours x \$30/hour for Metropolis
 \$ 480.00 16 hours x \$30/hour for MN
 \$ 125.00 Shipping est.

\$3,682.50 Total

Additionally, based on this volume of required documents, we will not be able to retrieve all documents by the commanded time of February 20, 2008 and would require an extension to March 20, 2008.

Please sign, date, and fax this form to me at 952-697-2074, if you would like us to proceed.

Robert Pickle and Gailon Joy _____ Date

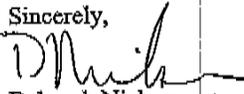
Please mail check to:

MidCountry Bank
Attn: Deborah Nielsen
14525 Highway 7, Suite # 145
Minnetonka, MN 55345

With your authorization, we will start pulling documents immediately but will hold shipment until payment is received.

Please feel free to call me if you have any questions or if I can be of further assistance.

Sincerely,



Deborah Nielsen
MidCountry Bank
Administrative Associate
952-843-5222 (direct)



MIDCOUNTRY BANK

Checking accounts, pre & post conversion nos.:	Post Conv. #s	Pre Conv. #s	Open Date	Close Date	Months prior	Months post
Danny L Shelton	877	64 & 74	Opened 5/18/2004	Closed 12/20/2006	11	20
Danny L Shelton	206	200	Opened 5/14/1998	Closed 12/13/2006	84	20
DLS, Danny Shelton	766	68	Opened 12/8/2004	Closed 12/18/2006	4	20
Three Angels Broadcasting: Danny L Shelton	005	1007	Opened 08/1/1992	Closed 6/30/2005	84	2
Three Angels Broadcasting: Danny L Shelton	305	03	Opened 04/2000	Closed 8/31/2005	60	5
Three Angels Broadcasting: Danny L Shelton	487	86	Opened 11/2001	Closed 7/19/2005	41	4
Three Angels Broadcasting: Danny L Shelton	131*	5**	Opened 4/27/2005	Closed 6/30/2005	0	3
Danny & Linda Shelton			Opened 5/1990	Closed 6/1/2004	84	0

Savings accounts, pre & post conversion nos.:

Danny Shelton	New 701	708	Opened 05/24/2004	Closed 2/12/2006	11	11
Three Angels Broadcasting: Danny Shelton		30**	Opened 11/1992	Closed 08/01/2002	84	0

^A Conversion was 4/23/05 from Comm Bank to MidCountry Bank
 * opened post conversion
 **closed prior to conversion

\$	2,315.00	total statements x \$5.00 each pre conversion;	463	85
\$	42.50	number of statement months x 2 pages est for each @ .25/each		
\$	720.00	24 hours x \$30/hour for Metropolis		
\$	480.00	16 hours x \$30/hour to pull documents MN		
\$	125.00	shipping		
\$	3,682.50			

Phil

MidCountry Bank Confidential 2/14/2008



www.MidCountryBank.com



MIDCOUNTRY BANK

Ex. E

February 12, 2008

Gailon Arthur Joy
Robert Pickle

[REDACTED]
Halstad, MN 56548

RE: Subpoena for:
Case N. 07-40098
Three Angels Broadcasting and Danny Shelton

Dear Sirs,

MidCountry Bank charges the following fees for research and copies:

Photo Copies	\$ 0.25 / page
Research	\$30.00 / hour
Archived Copies* (* documents prior to May 2005)	\$ 5.00 / statement

Payment in advance is required.

For all statements, on all accounts, 1998 to current:

\$2,615.00	total statements x \$5.00 each pre conversion
\$ 42.50	number of statements x 2 pages for each @ \$0.25/each post conversion
\$ 720.00	24 hours x \$30/hour for Metropolis
\$ 480.00	16 hours x \$30/hour for MN
\$ 125.00	Shipping est.

\$3,682.50 Total

Additionally, based on this volume of required documents, we will not be able to retrieve all documents by the commanded time of February 20, 2008 and would **require an extension to six weeks after faxed instructions are received.**

For all statements Post Conversion, on all accounts, from May 2005 to present:

\$ 42.50	number of statements x 2 pages for each @ \$0.25/each post conversion
\$480.00	16 hours x \$30/hour for MN
<u>\$ 75.00</u>	

\$597.50 Total

We would require an extension to two weeks after faxed instructions are received.

In reference to account types for pre-conversion ComBank accounts:

[REDACTED] 74	- Premier Checking Plus, Personal account
[REDACTED] 200	- Premier Checking, Personal account
[REDACTED] 8	- Business Checking account



MIDCOUNTRY BANK

- 6 - Now Account Pre-Premier, Business Checking account
- 007 - Cash Management, Business Checking account
- 3 - Regular Checking, Business Checking account
- 6 - Business Checking, Payroll account
- 005 - Regular Checking, Personal account

These accounts would have been converted to MidCountry Bank account types most similar to what they were prior to conversion.

Please sign, date, and fax this form to me at 952-697-2074, if you would like us to proceed, indicating which option you prefer.

Robert Pickle	Date	and	Gailon Joy	Date
---------------	------	-----	------------	------

Revised Document request list - Please list by account number & dates, which statements you would like pulled:

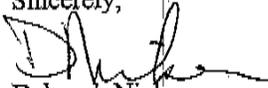
Please mail check to:

MidCountry Bank
Attn: Deborah Nielsen
14525 Highway 7, Suite # 145
Minnetonka, MN 55345

With your authorization, we will start pulling documents immediately but will hold shipment until payment is received.

Please feel free to call me if you have any questions or if I can be of further assistance.

Sincerely,



Deborah Nielsen
 MidCountry Bank
 Administrative Associate
 952-843-5222 (direct)



[Exhibit F for the Motion to Quash from the District of Minnesota was previously filed in the District of Massachusetts as **Exhibit Q** attached to **Document #49.**]

Ex.
~~**R**~~
G

[Exhibit G for the Motion to Quash from the District of Minnesota was previously filed in the District of Massachusetts as **Exhibit R** attached to **Document #49.**]

Ex. H

SEARCH

Sign Up!

***An Attempt to Mend a Broken Network
& Save the Cause of Christ from Reproach***

A Save3ABN Exclusive

How to Turn \$6,139 into \$135,000 in Just 7 Days???

7 Simple Steps to Easy Money???

[< Prev.](#)

[Next >](#)

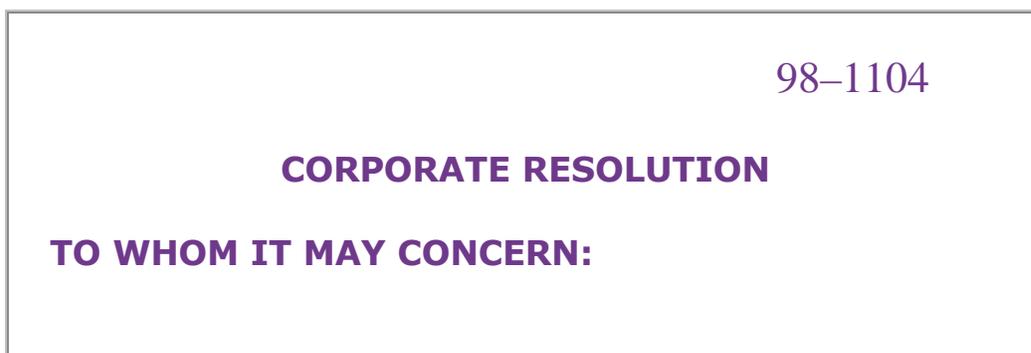
This topic concerns real estate transactions from the year 1998, transactions regarding a piece of property identified as "Lot 6" in the legal description, a piece of property that at one time was the Shelton home. Scans of the actual documents in question appear at the bottom of this web page.

Step 1: Non-Profit Buys "Lot 6"

A number of things transpired prior to the start of those allegedly highly profitable 7 days of September 25 through October 2, 1998. As the story goes, philanthropist May Chung either put up the money for 3ABN to buy "Lot 6," as suggested by one of the documents below, or bought "Lot 6" and deeded it to 3ABN.

Step 2: Non-Profit Grants Life Estate

The next step to an alleged \$129,000 profit in 7 days was for 3ABN president Danny Shelton, his then wife and 3ABN corporation secretary Linda Shelton, and philanthropist May Chung to receive a life estate in "Lot 6," allowing them to use this 3ABN property as long as they lived.



- Home Page
- Site Map
- Tommy Shelton
- Danny Shelton
- ASI
- Smokescreen
- Abuse of Power
- Ethical
- Allegations
- Financial
- Allegations
- Book Deals
- Form 990's, etc.
- Real Estate
- \$129,000 Profit
- Improper 990
- Perjury?
- Cheating the IRS?
- Jet Costs
- Send Your Tithe
- Selling K36FJ
- Selling K58DL
- Correspondence
- Untruths
- Alleged Illegal
- Activities
- Mene, Mene,
- Tekel, Parsin
- Danny's Apologists
- Leonard Westphal
- 3ABN Board
- Litigation, etc.
- Letters of Support
- Letters of Criticism
- News Releases
- Sign Up!
- Contact Us

Added 2/10/2008
Objections Heard

Added 1/25/2008
Church Vote

Added 1/22/2008

Page -1- CORPORATION RESOLUTION

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If May Chung really was the one who put up the money to buy "Lot 6," why were the Sheltons given a life estate in "Lot 6" too?

And what exactly does it mean for the officers to be authorized "to sign the deed for conveyance purposes" in connection with a vote "to convey a life estate to Danny L. Shelton"? When someone is granted a life estate by an organization, there is no need to sign a deed, as we point out below.

Step 3: Non-Profit Deeds "Lot 6"

Now is where things really start getting a bit strange: In February 1998, "Lot 6" is titled in Danny, Linda, and May's names because of their life estate, almost a year and a half after they were allegedly given that life estate by the 3ABN Board. If the 3ABN Board really voted in September 1996 to authorize the officers to "convey" the property to Danny by signing a deed, why did they wait a year and a half to do it?

We have consulted a number of real estate and trust services experts, and each tells us that when you receive a life estate, you never have the property titled in your name. Was "Lot 6" deeded to Danny Shelton in February just so that he could sell the property at a substantial profit in October?

(Life Estate only)

WARRANTY DEED - JOINT TENANCY

THE GRANTORS, THREE ANGELS BROADCASTING
NETWORK, INC., a corporation, of 3391
Charley Good Road, West Frankfort,
County of Franklin and State of Illinois

for and in consideration of Ten Dollars (\$10) O.V.C. Dollar in hand paid,
Conveys and warrants to DANNY L. SHELTON, LINDA S. SHELTON,

and MAY CHUNG, not as tenancy in common but in JOINT TENANCY, the following described real estate:

A life estate only for the lifetime of DANNY L. SHELTON and LINDA S. SHELTON, husband and wife, and MAY CHUNG, or the survivors/survivor of them, in the following property:

Lot Six (6) in Surveyor's Plat of the Northeast Quarter (NE 1/4) of Section Sixteen (16), Township Seven (7) South, Range Four (4) East of the Third Principal Meridian, except the coal, oil, gas and other minerals underlying the same, situated in Franklin County, Illinois.

situated in the County of Franklin, in the State of Illinois, hereby releasing and waiving all rights and under and by virtue of the Homestead Exemption Laws of this State.

Dated February 16, 1998.

THREE ANGELS BROADCASTING NETWORK, INC.

Attested By:

By: [Signed]
Danny L. Shelton, President

 [Signed]
Walter C. Thompson
Board Chairman, 3ABN

By: [Signed]
Linda S. Shelton, Secretary

DEED PREPARED BY: Herald Follett, Attorney
P.O. Box 3092
Portland, Oregon 97208

Page -1- WARRANTY DEED - JOINT TENANCY

(See copy of Corporate Resolution attached hereto)

PAGE 1 OF 3

Step 4: Philanthropist Surrenders Life Estate

At the time of Danny's allegedly super-profitable sale on October 2, 1998, he would have had to split his profits with May Chung, unless he could get her off the title of "Lot 6" before that point. And thus on August 24, 1998, just 6 months after her name got on the title, May Chung's name is off again.

Kind of odd, isn't it, that May Chung would have been given a life estate in a property in Illinois, and then deeded that property, if all the while she remained a resident of San Bernardino, California, as the deed below suggests? And why put her name on the title of "Lot 6" at all if she was only going to be on for six months?

WARRANTY DEED

THE GRANTOR, MAY CHUNG
of 155 Manchester Lane
San Bernardino, CA 92408

for and in consideration of Ten Dollars (\$10.00) O.V.C. Dollar in hand paid, Grantor conveys and warrants to THREE ANGELS BROADCASTING NETWORK, INC., a Corporation, all of Grantor's interest in the following described real estate:

Grantor's life estate for her lifetime, and any survivorship rights she may have related to the interest of Danny L. Shelton and Linda S. Shelton, or the survivor of them, in the following property:

Lot Six (6) in Surveyor's Plat of the Northeast Quarter (NE 1/4) of Section Sixteen (16), Township Seven (7) South, Range Four (4) East of the Third Principal Meridian, except the coal, oil, gas and other minerals underlying the same, situated in the County of Franklin, and State of Illinois,

hereby further releasing and waiving all rights in and under by virtue of the Homestead Exemption Laws of this State.

Dated August 24, 1998.

_____[Signed]_____
May Chung

Attested By:

[Signed, Herald Follett]

Approved and consented to by:

[Signed]

Danny L. Shelton, President

[Signed]

Linda S. Shelton, Secretary

Step 5: Non-Profit Surrenders Interest for \$6,139

It is this transaction that raises a lot of questions. What it appears from the deed is that the Sheltons in essence bought "Lot 6" in September 1998 for a mere \$6,139, just one week before they sold it to Elora Ford for \$135,000. Now the fact that \$6,139 is below fair market value raises some serious tax questions.

- Was the total consideration given by the Sheltons to 3ABN for "Lot 6" really only \$6,139?
- Did the total consideration given for "Lot 6," even if more than \$6,139, fall below fair market value?
- If so, does this real estate transaction constitute "private inurement"?
- If it does, will the IRS revoke 3ABN's tax exempt status, or have all applicable statutes of limitations run out?
- If 3ABN's tax exempt status is revoked, will the IRS assess some of 3ABN's donors for back taxes?

In case you haven't caught on, the IRS does not allow non-profit organizations to give away property at prices below market value for the benefit of private citizens. Doing so can jeopardize that organization's tax exempt status. And the loss of tax exempt status can affect donors retroactively, particularly if donations were given in bad faith.

While the IRS is highly unlikely to go after small donors, some of 3ABN's larger donors will undoubtedly breathe a lot easier if the IRS decides that there are no tax implications to the deed below. And since we are talking about something that happened in 1998, the typical statute of limitations for such things has most likely run out.

WARRANTY DEED

THE GRANTOR, Three Angels Broadcasting Networks, Inc.
3391 Charley Good Road
West Frankfort, Illinois 62896-0220,

for and in consideration of Six thousand one hundred thirty nine and no/100 (\$6,139.00) Dollars, O.V.C. Dollar in hand paid, Grantor conveys and warrants to Danny L. Shelton and Linda S. Shelton, husband and wife, all of Grantor's interest in the following described real estate:

Lot Six (6) in Surveyor's Plat of the Northeast Quarter (NE 1/4) of Section Sixteen (16), Township Seven (7) South, Range Four (4) East of the Third Principal Meridian, except the coal, oil, gas and other minerals underlying the same, situated in the County of Franklin, and State of Illinois,

(Note: This deed is given for the purpose of the Grantor conveying its remainder interest in said property to the Grantees herein, Danny L. Shelton and Linda S. Shelton, who at the date of this transfer have a life estate in said property.)

hereby further releasing and waiving all rights in and under by virtue of the Homestead Exemption Laws of this State.

Dated 9/25, 1998.

Three Angels Broadcasting Network,
Inc.

By: [Signed]
Danny L. Shelton, President

By: [Signed]
Linda S. Shelton, Secretary

Attested By:

[Signed]

Walter C. Thompson
Chairman of the Board of Directors

Step 6: The Sheltons Sell Property for \$135,000

First, here is the deed that governed the sale of the property, a deed prepared by D. Michael Riva, the same attorney that sent those nasty cease and desist letters [to Pastor Glenn Dryden](#) and [to the Church Board](#) of the Community Church of God in Dunn Loring, Virginia:

WARRANTY DEED

ILLINOIS STATUTORY

MAIL TO:

ELORA L. FORD, Trustee
2804 NEW LAKE ROAD
WEST FRANKFORT IL
62896

NAME & ADDRESS OF TAXPAYERS:

ELORA L. FORD, Trustee
2804 NEW LAKE ROAD
WEST FRANKFORT 62896

THE GRANTORS, DANNY L. SHELTON and LINDA S. SHELTON, Husband and Wife each in their own right and as spouse of the other, of the City of Thompsonville, County of Franklin, State of Illinois, for and in consideration of the sum of **TEN DOLLARS (\$10.00), AND OTHER GOOD AND VALUABLE CONSIDERATION**, in hand paid, the receipt of which is hereby acknowledged, **CONVEY and WARRANT TO: ELORA L. FORD**, as Trustee of **THE FORD FAMILY TRUST** established by the provisions of **THE FORD REVOCABLE TRUST Agreement dated September 23, 1992**, of West Frankfort, Franklin County, Illinois, all interest in the following described Real Estate situated in the County of Franklin, State of Illinois, to-wit:

LOT SIX (6) IN SURVEYOR'S PLAT OF THE NORTHEAST QUARTER (NE 1/4) OF SECTION 16 TOWNSHIP 7 SOUTH RANGE 4 EAST OF THE THIRD PRINCIPAL MERIDIAN EXCEPT THE COAL OIL, GAS AND OTHER MINERALS UNDERLYING THE SAME, SITUATED IN FRANKLIN COUNTY, ILLINOIS.

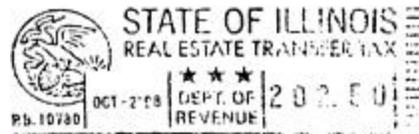
hereby releasing and waiving all rights under and by virtue of the Homestead Exemption Laws of the State of Illinois.

D. MICHAEL RIVA, AS PREPARER OF THIS DEED, HAS MADE NO INVESTIGATION CONCERNING ANY POSSIBLE VIOLATIONS OF ANY ENVIRONMENTAL LAWS OR REGULATIONS INCLUDING, BUT NOT LIMITED TO, THE ILLINOIS RESPONSIBLE TRANSFER ACT; AND THE PARTIES OF THIS DEED, BY VIRTUE OF THEIR EXECUTION, DELIVERY AND/OR ACCEPTANCE, ACKNOWLEDGE THAT THEY HAVE READ THE FOREGOING AND ACKNOWLEDGE THAT D. MICHAEL RIVA, HAS NOT BEEN ASKED TO REPRESENT AND/OR ADVISE THEM IN ANY WAY CONCERNING SUCH LAWS AND REGULATIONS; AND FURTHER ACKNOWLEDGE THAT SHOULD THIS REAL ESTATE BE GOVERNED BY, OR SUBJECT TO, SUCH LAWS AND REGULATIONS, THAT SUCH COULD YIELD VERY SUBSTANTIAL DAMAGES AND PENALTIES TO THE PARTIES.

Permanent Index Number:

Property Address: 2804 New Lake Road, West Frankfort IL 62896

DATED October 2, 1998.



[Signed] (SEAL)
Danny L. Shelton

[Signed] (SEAL)
Linda S. Shelton

See the Real Estate Transfer Tax stamp above with the amount \$202.50 in it? That consists of 0.15% of the total consideration of \$135,000 the Sheltons paid, 0.10% which goes to the State of Illinois and 0.05% which goes to Franklin County:

Document Fees			
Type	Description	Calc Method	Fee Amount

001	STATE OF ILLINOIS	Net	\$135.00
002	COUNTY FEE	Net	\$67.50
003	AUTOMATION FEE	Document	\$3.00
004	RECORDING FEE 1-4 PGS	1-4 Pages	\$12.00
Total Fee			\$217.50

Consideration

Full Actual Consideration	\$135,000.00
Personal Property	\$0.00
Net Consideration	\$135,000.00
Other Real Property	\$0.00
Mortgage Property	\$0.00
Net Taxable Consideration	\$135,000.00

Other Comments and Questions

1998 was allegedly a very profitable year for Danny Shelton, not just because of "Lot 6." Below you will find a June 1998 real estate transaction in which Elora Ford gave Danny a gift of the 18 acres upon which his present house sits. No real estate transfer taxes were paid due to what looks like paragraph "e" of "Section 35 ILCS 200/31-45," a paragraph which states that no transfer taxes have to be paid if the total consideration given is less than \$100.

Speaking of taxes, it is interesting that the February 1998 deed claimed that the board action granting Danny a life estate in "Lot 6" was taken in September 1996. Was Danny trying to avoid taxes on short-term capital gains by holding the property for more than two years? But then, since the property apparently did not actually become his until September 25, 1998, and he sold it on October 2 just one week later, wouldn't there be no way to say that he owned "Lot 6" for two years?

- Did Danny Shelton report this profit on his 1998 tax return?
- If so, did he report it as a short-term or as a long-term capital gain?
- Did 3ABN report their "gift" of "Lot 6" to Danny on his W-2?
- Did 3ABN also report it on their [1998 Form 990](#) as part of their compensation to Danny?

(Life Estate only)

WARRANTY DEED - JOINT TENANCY

THE GRANTORS, THREE ANGELS BROADCASTING NETWORK, INC., a corporation, of 3391 Charley Good Road, West Frankfort, County of Franklin and State of Illinois

STATE OF ILLINOIS
County of Franklin
Document No. 98-1104
Filed for record

FEB 24 1998

150
Fee paid \$1.00

Rae Dohill

for and in consideration of Ten Dollars (\$10) O.V.C. Dollar in hand paid, Conveys and warrants to DANNY L. SHELTON, LINDA S. SHELTON, and MAY CHUNG, not as tenancy in common but in JOINT TENANCY, the following described real estate:

A life estate only for the lifetime of DANNY L. SHELTON and LINDA S. SHELTON, husband and wife, and MAY CHUNG, or the survivors/survivor of them, in the following property:

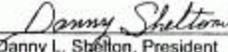
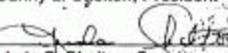
Lot Six (6) in Surveyor's Plat of the Northeast Quarter (NE 1/4) of Section Sixteen (16), Township Seven (7) South, Range Four (4) East of the Third Principal Meridian, except the coal, oil, gas and other minerals underlying the same, situated in Franklin County, Illinois.

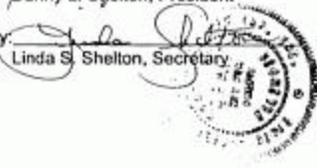
situated in the County of Franklin, in the State of Illinois, hereby releasing and waiving all rights and under and by virtue of the Homestead Exemption Laws of this State.

Dated February 16, 1998.

THREE ANGELS BROADCASTING NETWORK, INC.

Attested By: 
Waller C. Thompson
Board Chairman, 3ABN

By: 
Danny L. Shelton, President
By: 
Linda S. Shelton, Secretary



DEED PREPARED BY: Herald Follett, Attorney
P.O. Box 3092
Portland, Oregon 97208

Page -1- WARRANTY DEED - JOINT TENANCY

(See copy of Corporate Resolution attached hereto)

PAGE 1 OF 3

98-1104

CORPORATE RESOLUTION

TO WHOM IT MAY CONCERN:

This is to certify that Linda S. Shelton is the duly qualified and elected Secretary, and Walter C. Thompson is the duly qualified and elected Chairman of the Board of Directors of THREE ANGELS BROADCASTING NETWORK, INC., a corporation, of the City of West Frankfort, County of Franklin and State of Illinois, and that at a regular meeting of the Board of Directors, held on September 15, 1996, the following action was taken and recorded in the minutes of said corporation, of which action, this is a true copy, to-wit:

15) It was voted to convey a life estate to Danny L. Shelton, Linda S. Shelton and May Chung, or the survivors and/or survivor of them, on the property located at Route 3, Box 10, in Thompsonville, as provided in the original gift that provided for the purchase of the property, and to authorize the officers to sign the deed for conveyance purposes. Said property is legally described as follows:

Lot Six (6) in Surveyor's Plat of the Northeast Quarter (NE 1/4) of Section Sixteen (16), Township Seven (7) South, Range Four (4) East of the Third Principal Meridian, except the coal, oil, gas and other minerals underlying the same, situated in Franklin County, Illinois.

The records of THREE ANGELS BROADCASTING NETWORK, INC. disclose that Danny L. Shelton is the President, and Linda S. Shelton is the Secretary, and Walter C. Thompson is Chairman of the Board of Directors.

THREE ANGELS BROADCASTING NETWORK, INC.

Dated: February 18, 1998.

By: Walter C. Thompson
Walter C. Thompson
Board Chairman

Dated: February 16, 1998.

By: Linda S. Shelton
Linda S. Shelton
Corporation Secretary



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PAGE 3 OF 3

WARRANTY DEED

JOINT TENANCY ILLINOIS STATUTORY

MAIL TO:
DANNY L. SHELTON
21027 SHAWNEETOWN ROAD
THOMPSONVILLE IL 62890

NAME & ADDRESS OF TAXPAYERS:
DANNY L. SHELTON
21027 SHAWNEETOWN ROAD
THOMPSONVILLE IL 62890

STATE OF ILLINOIS
County of Franklin
Document No. 98-6766
Filed for record

UCT 02 1998

1:20 o'clock
Fee paid \$151.00

Rae Dohill

THE GRANTOR, ELORA FORD, of the City of West Frankfort, County of Franklin, State of Illinois, for and in the consideration of **ONE DOLLAR (\$1.00)**, and other good and valuable consideration, in hand paid **CONVEYS and WARRANTS TO: DANNY L. SHELTON and LINDA S. SHELTON**, or to the survivor of them, *not as Tenants in Common*, but as **JOINT TENANTS**, all interest in the following described Real Estate situated in the County of Franklin, State of Illinois, to-wit:

A PART OF THE NORTHWEST ONE-FOURTH (NW 1/4) OF THE NORTHEAST QUARTER (NE 1/4) OF SECTION 20, TOWNSHIP 7 SOUTH, RANGE 4 EAST OF THE THIRD PRINCIPAL MERIDIAN; MORE PARTICULARLY DESCRIBED AS BEGINNING AT AN IRON PIN MARKING THE NORTHWEST CORNER OF THE SAID NORTHWEST ONE-FOURTH (NW 1/4) OF THE NORTHEAST QUARTER (NE 1/4); THENCE RUNNING SOUTH ALONG THE WEST LINE THEREOF A DISTANCE OF 593.32 FEET TO A POINT; THENCE RUNNING EAST ALONG A LINE PARALLEL TO THE NORTH LINE OF THE SAID QUARTER-QUARTER A DISTANCE OF 1329.86 FEET TO A POINT LOCATED ON THE EAST LINE OF THE SAID QUARTER-QUARTER; THENCE RUNNING NORTH ALONG THE SAID EAST LINE A DISTANCE OF 593.32 FEET TO AN IRON PIN MARKING THE NORTHEAST CORNER OF THE SAID QUARTER-QUARTER; THENCE RUNNING WEST ALONG THE SAID NORTH LINE A DISTANCE OF 1330.12 FEET TO THE POINT OF BEGINNING; ALL BEING SITUATED IN FRANKLIN COUNTY, ILLINOIS, EXCEPTING THE COAL, OIL, GAS AND OTHER MINERALS UNDERLYING THE SAME AND ALL RIGHTS AND EASEMENTS IN FAVOR OF THE OWNER OF THE MINERAL ESTATE OR OF ANY PARTY CLAIMING BY, THROUGH OR UNDER SAID ESTATE, SITUATED IN FRANKLIN COUNTY, ILLINOIS.

hereby releasing and waiving all rights under and by virtue of the Homestead Exemption Laws of the State of Illinois.

TITLE NOT INSPECTED BY PREPARER OF DEED AND LEGAL DESCRIPTION PROVIDED BY GRANTOR.

PAGE 1 OF 2

D. MICHAEL RIVA, AS PREPARER OF THIS DEED, HAS MADE NO INVESTIGATION CONCERNING ANY POSSIBLE VIOLATIONS OF ANY ENVIRONMENTAL LAWS OR REGULATIONS INCLUDING, BUT NOT LIMITED TO, THE ILLINOIS RESPONSIBLE TRANSFER ACT; AND THE PARTIES OF THIS DEED, BY VIRTUE OF THEIR EXECUTION, DELIVERY AND/OR ACCEPTANCE, ACKNOWLEDGE THAT THEY HAVE READ THE FOREGOING AND ACKNOWLEDGE THAT D. MICHAEL RIVA, HAS NOT BEEN ASKED TO REPRESENT AND/OR ADVISE THEM IN ANY WAY CONCERNING SUCH LAWS AND REGULATIONS; AND FURTHER ACKNOWLEDGE THAT SHOULD THIS REAL ESTATE BE GOVERNED BY, OR SUBJECT TO, SUCH LAWS AND REGULATIONS, THAT SUCH COULD YIELD VERY SUBSTANTIAL DAMAGES AND PENALTIES TO THE PARTIES.

Permanent Index Number: _____

Property Address: _____

DATED June 10, 1998.

Elora Ford (SEAL)
ELORA FORD

EXEMPT UNDER PROVISIONS OF PARAGRAPH C
SECTION 35 ILCS 200/31-45, REAL ESTATE TRANSFER TAX ACT.
12-2-98 Franklin Co
DATE 12-2-98 BUYER, SELLER OR REPRESENTATIVE

STATE OF ILLINOIS)
COUNTY OF FRANKLIN) SS.

I, the undersigned, a Notary Public in and for said County, in the State aforesaid, DO HEREBY CERTIFY THAT ELORA FORD, personally known to me to be the same person whose name is subscribed to the foregoing instrument, appeared before me this day in person, and acknowledged that she signed, sealed and delivered the said instrument as her free and voluntary act, for the uses and purposes therein set forth.

Given under my hand and notarial seal this 10th day of June, 1998.

Peggy Y Stanley
NOTARY PUBLIC

My commission expires on _____, 19____.



NAME & ADDRESS OF PREPARER:
D. MICHAEL RIVA, LTD.
D. MICHAEL RIVA, ATTORNEY
226 EAST MAIN STREET
WEST FRANKFORT IL 62896
618/937-2404

**This conveyance must contain the name and address of the Grantee for tax billing purposes (55 ILCS 5/3-5020) and the name and address of the preparer of the instrument. (55 ILCS 5/3-5022)

wpdmsfubtwr.doc

WARRANTY DEED

THE GRANTOR, MAY CHUNG
of 155 Manchester Lane
San Bernardino, CA 92408

STATE OF ILLINOIS
County of Franklin
Document No. 98-5921
Filed for record
AUG 28 1998
4:30 o'clock P.M.
Fee paid \$12.00
Stan Dohill

for and in consideration of Ten Dollars (\$10.00) O.V.C. Dollar in hand paid, Grantor conveys and warrants to THREE ANGELS BROADCASTING NETWORK, INC., a Corporation, all of Grantor's interest in the following described real estate:

Grantor's life estate for her lifetime, and any survivorship rights she may have related to the interest of Danny L. Shelton and Linda S. Shelton, or the survivor of them, in the following property:

Lot Six (6) in Surveyor's Plat of the Northeast Quarter (NE 1/4) of Section Sixteen (16), Township Seven (7) South, Range Four (4) East of the Third Principal Meridian, except the coal, oil, gas and other minerals underlying the same, situated in the County of Franklin, and State of Illinois,

hereby further releasing and waiving all rights in and under by virtue of the Homestead Exemption Laws of this State.

Dated August 24, 1998.

May Chung
May Chung

Attested by:

[Signature]

Approved and consented to by:
Danny Shelton
Danny L. Shelton

Linda S. Shelton
Linda S. Shelton

STATE OF CALIFORNIA)
) ss.
County of San Bernardino)

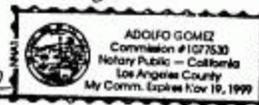
I, Adolfo Gomez, a Notary Public, in and for said County, in the State aforesaid, do hereby certify that May Chung, also known as May E. Chung, and personally known to me to be the same person whose name is subscribed to the foregoing instrument, appeared before me this day in person and acknowledged that she signed, sealed and delivered the said instrument as her free and voluntary act, for the uses and purposes therein set forth, including the release and waiver of the right of homestead.

Given under my hand and Notarial seal, on August 24, 1998.

Adolfo Gomez
(Signature) Notary Public

Page 1 of 2 - WARRANTY DEED

PAGE 1 OF 2



STATE OF ILLINOIS
 County of Franklin
 Document No. 98-6767
 Filed for record
 OCT 02 1998
1:20 o'clock
 Fee paid \$15.00
Rae Dohill

WARRANTY DEED

THE GRANTOR, Three Angels Broadcasting Networks, Inc.
 3391 Charley Good Road
 West Frankfort, Illinois 62896-0220,

for and in consideration of Six thousand one hundred thirty nine and no/100 (\$6,139.00) Dollars, O.V.C. Dollar in hand paid, Grantor conveys and warrants to Danny L. Shelton and Linda S. Shelton, husband and wife, all of Grantor's interest in the following described real estate:

Lot Six (6) in Surveyor's Plat of the Northeast Quarter (NE 1/4) of Section Sixteen (16), Township Seven (7) South, Range Four (4) East of the Third Principal Meridian, except the coal, oil, gas and other minerals underlying the same, situated in the County of Franklin, and State of Illinois,

(Note: This deed is given for the purpose of the Grantor conveying its remainder interest in said property to the Grantees herein, Danny L. Shelton and Linda S. Shelton, who at the date of this transfer have a life estate in said property.)

hereby further releasing and waiving all rights in and under by virtue of the Homestead Exemption Laws of this State.

Dated 9/25, 1998.

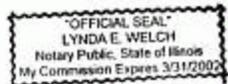
Three Angels Broadcasting Network, Inc.
 By: Danny L. Shelton
 Danny L. Shelton, President
 By: Linda S. Shelton
 Linda S. Shelton, Secretary

Attested by:
Walter C. Thompson
 Walter C. Thompson
 Chairman of the Board of Directors

STATE OF ILLINOIS }
 County of Franklin } ss.

I, Lynda E. Welch, a Notary Public, in and for said County, in the State aforesaid, do hereby certify that Danny L. Shelton and Linda S. Shelton personally known to me to be the same individuals whose names are subscribed to the foregoing instrument, appeared before me this day in person and acknowledged that they signed, sealed and delivered the said instrument as their free and voluntary act, as President and as Secretary of Three Angels Broadcasting Network, Inc., respectively, by authority of the Board of Directors of said Corporation, for the uses and purposes therein set forth, including the release and waiver of the right of homestead.

Given under my hand and Notarial seal, on 9/25, 1998.



Lynda E. Welch Notary Public
 (Signature)

WARRANTY DEED

ILLINOIS STATUTORY

MAIL TO:
 ELORA L. FORD, Trustee
 2804 NEW LAKE ROAD
 WEST FRANKFORT IL 62896

NAME & ADDRESS OF TAXPAYERS:
 ELORA L. FORD, Trustee
 2804 NEW LAKE ROAD
 WEST FRANKFORT 62896

STATE OF ILLINOIS
 County of Franklin
 Document No. 98-6768
 Filed for record

OCT 02 1998

L. M.
 Fee paid \$ 15.00

Rae Nobill

THE GRANTORS, DANNY L. SHELTON and LINDA S. SHELTON, Husband and Wife, each in their own right and as spouse of the other, of the City of Thompsonville, County of Franklin, State of Illinois, for and in consideration of the sum of **TEN DOLLARS (\$10.00), AND OTHER GOOD AND VALUABLE CONSIDERATION**, in hand paid, the receipt of which is hereby acknowledged, **CONVEY and WARRANT TO: ELORA L. FORD**, as Trustee of **THE FORD FAMILY TRUST** established by the provisions of **THE FORD REVOCABLE TRUST** Agreement dated September 23, 1992, of West Frankfort, Franklin County, Illinois, all interest in the following described Real Estate situated in the County of Franklin, State of Illinois, to-wit:

LOT SIX (6) IN SURVEYOR'S PLAT OF THE NORTHEAST QUARTER (NE 1/4) OF SECTION 16, TOWNSHIP 7 SOUTH, RANGE 4 EAST OF THE THIRD PRINCIPAL MERIDIAN, EXCEPT THE COAL, OIL, GAS AND OTHER MINERALS UNDERLYING THE SAME, SITUATED IN FRANKLIN COUNTY, ILLINOIS.

hereby releasing and waiving all rights under and by virtue of the Homestead Exemption Laws of the State of Illinois.

D. MICHAEL RIVA, AS PREPARER OF THIS DEED, HAS MADE NO INVESTIGATION CONCERNING ANY POSSIBLE VIOLATIONS OF ANY ENVIRONMENTAL LAWS OR REGULATIONS INCLUDING, BUT NOT LIMITED TO, THE ILLINOIS RESPONSIBLE TRANSFER ACT; AND THE PARTIES OF THIS DEED, BY VIRTUE OF THEIR EXECUTION, DELIVERY AND/OR ACCEPTANCE, ACKNOWLEDGE THAT THEY HAVE READ THE FOREGOING AND ACKNOWLEDGE THAT D. MICHAEL RIVA, HAS NOT BEEN ASKED TO REPRESENT AND/OR ADVISE THEM IN ANY WAY CONCERNING SUCH LAWS AND REGULATIONS; AND FURTHER ACKNOWLEDGE THAT SHOULD THIS REAL ESTATE BE GOVERNED BY, OR SUBJECT TO, SUCH LAWS AND REGULATIONS, THAT SUCH COULD YIELD VERY SUBSTANTIAL DAMAGES AND PENALTIES TO THE PARTIES.

Permanent Index Number:
 Property Address: 2804 New Lake Road, West Frankfort IL 62896

DATED October 2, 1998.



Danny Shelton (SEAL)
 DANNY L. SHELTON

Linda Shelton (SEAL)
 LINDA S. SHELTON

PAGE 1 OF 2

Document 1998-006768

Document Number: 1998-006768

Document Type: DEED - ALL DEEDS EXCEPT CEMETERY

Document Group: 01 - DEED INSTRUMENT

Overview | Detail | Grantor | Grantee | Delivered To | Tax Bill | Parcel | Legal | **Fees** | Reference

Type	Description	Calc Method	Fee Amount
001	STATE OF ILLINOIS	Net	\$135.00
002	COUNTY FEE	Net	\$67.50
003	AUTOMATION FEE	Document	\$3.00
050	RECORDING FEE 1-4 PGS	1-4 Pages	\$12.00
Total Fee			\$217.50

Consideration

Full Actual Consideration: \$135,000.00

Personal Property: \$0.00

Net Consideration: **\$135,000.00**

Other Real Property: \$0.00

Mortgage Property: \$0.00

Net Taxable Consideration: \$135,000.00

Receipt Information

Recalc Fees | Recalc Fees | Add Fee | Delete Fee

[< Prev.](#)

[Next >](#)

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3B4839

***"Truth invites examination & needs no defense.
Lies hide in darkness & blame everyone else."***

Ex. I

Subject: Board members, new board members, Rule 26(a)(1) materials
From: Bob <bob@pickle-publishing.com>
Date: Fri, 30 Nov 2007 11:43:35 -0600
To: Jerrie Hayes <jerriehayes@sbgdf.com>
CC: "G. Arthur Joy" <gailon@gabbjoy4.com>, Gerald Duffy <gerryduffy@sbgdf.com>, William Christopher Penwell <chrispenwell@sbgdf.com>, "Kristin L. Kingsbury" <kristinkingsbury@sbgdf.com>, John Pucci <pucci@fierstpucci.com>, Lizette Richards <richards@fierstpucci.com>

Ms. Hayes:

Your reply of November 28, 2007, comes at a bit of surprise.

First of all, you state that "you will not provide me with the names and proposed dates and locations of the Board Members you wish to depose." And yet I already made it clear that I wanted to depose all the board members in southern Illinois during the week of the January board meeting. And that is why I need to know the date of the January board meeting.

Regarding my query as to which board members you felt were too new to know anything, you neglected to reply. I will simply remind you that the Plaintiffs' initial disclosures listed 12 board members as witnesses, including the name of the new board member Larry Romrell. It is clear that your clients have no problem calling new board members to testify.

And certainly new board members Stan Smith and Garwin McNeilus are not less knowledgeable than Mr. Romrell. Mr. Smith is listed as a board member on 3ABN's Form 990 for 1998, the same year Danny Shelton bought a house from 3ABN for about \$6,100 and sold it a week later for \$135,000. And Mr. McNeilus is one who purportedly was involved in the surveillance of Linda Shelton in 2004.

Regarding the Plaintiffs' refusal to authorize the inspection or production of Rule 26(a)(1) materials, despite no motions being filed seeking protective orders for particular documents, and your unwillingness to further "discuss any details concerning copying of materials," I suppose the next step is to bring this matter to the attention of the court.

Lastly, perhaps you did not understand my final paragraph. (206) 203-3751 was my fax number long before Mr. Joy or I became aware of the scandals at 3ABN, and he uses my fax number at my permission, not vice versa.

Bob Pickle

P.S. It is a puzzle to me why the defendants have not received any "written demand for settlement" from the plaintiffs, even though the plaintiffs' Rule 26(f) Conference report said they would make such a written demand by August 31, 2007. Did I miss something?