Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of	)	
	)	
Proceedings of the	)	Docket No. 17-CRB-0013 RM
Copyright Royalty Board;	)	
Violation of Standards of Conduct	)	
	)	

COMMENTS OF RAUL GALAZ TO PROPOSED RULE REGARDING VIOLATION OF STANDARDS OF CONDUCT

I, Raul Galaz, hereby submit my comments in response to the Proposed Rule of the Copyright Royalty Board ("CRB") set forth at 82 Fed. Reg. 18601 (April 20, 2017).

PERSONAL STATEMENT

My name is Raul Galaz. I am personally familiar with the facts stated herein and, if called upon could competently testify thereto.

In 2002 I was convicted of one count of mail fraud in connection with my false application for 1996-1998 retransmission royalties that, at the time, I had no authority to collect. I was sentenced to 18 months in a federal prison, and three years of supervised release. After the maximum reduction allowed for good

behavior, I satisfied my sentence. Upon release, I was provided a rarely issued letter of recommendation from the warden of the prison.

I was incarcerated during portions of 2003-2004, and since my release have appeared and testified on many occasions before the CRB, likely more than any other witness before the CRB. I have appeared as a witness on behalf of Worldwide Subsidy Group, LLC ("WSG") in proceedings relating to 1998-1999 cable, 2000-2003 cable, consolidated 2004-2009 cable and 1999-2009 satellite proceedings (the "Consolidated Proceedings"), and the 2010-2013 cable/satellite proceedings. I have testified orally and through written testimony about a wealth of matters, including as a percipient witness to scores of contracts between WSG and represented claimants, data and evidence supporting particular variations of cable and satellite methodologies, and as a witness critiquing multiple other methodologies. I have been accepted as an expert witness in the CRB proceedings relating to the CRB procedures.

Since my release from incarceration in 2004, in all proceedings before the CRB I have testified fully, honestly, and truthfully, and have never exaggerated. I have never known the results of a distribution methodology before advocating a particular distribution methodology. I have never crafted a distribution methodology in a manner that I believed would be more advantageous to a particular party. I have never asserted the entitlement of WSG to rights that I did

not fully believe WSG was entitled to prosecute. I comfortably assert the foregoing, without exception.

It would be an understatement to assert that I was surprised at the publication of the Proposed Rule. Based upon my review of the Proposed Rule in the Federal Register, I believe that it was designed primarily to exclude myself from the CRB proceedings, and preclude any entity from ever engaging me in CRB proceedings. In my mind, the Proposed Rule is but another extension of the demonization of me personally for acts that I took almost two decades ago.

Obvious issues exist with the legality of the Proposed Rule, and I am thoroughly familiar with those at this point. Nonetheless, even aside from the legality of its provisions, what is as interesting is the motivation that found need for the Judges to propose such regulation. I personally believe that it is a misunderstanding about myself, my motivations, and my actions in the CRB distribution proceedings. I believe that if the Judges had a more thorough understanding regarding such matters, they reasonably would not have submitted the Proposed Rule as a *de facto* means to remove myself from the CRB proceedings.

In my appearances before the CRB in the years since my release from incarceration in 2004, it has been a persistent tug-of-war between myself and WSG counsel as to the extent that my testimony should address the specifics of my

crime, my incarceration, and my life since. From the vantage point of WSG's counsel, such matters are irrelevant to the issues at hand. From my vantage point, I believed that the Judges needed to appreciate the context in which my testimony was being provided, in order to fully understand why under no circumstance I would ever falsely testify about any matter. I understood that my prior criminal conviction would reasonably give the Judges pause to question my credibility, but I also believed that the significance of my life experiences following my conviction would demonstrate why my testimony had to be particularly accurate and unexaggerated.

Ultimately, at the insistence of WSG counsel, my prior conviction was only briefly touched upon during oral testimony in a prior proceeding, sufficient only to explain my motivation for being forthright and open in my testimony. However, my review of the text and motivation for the Proposed Rule make it clear to me now that greater attention should have been given to the subject during my previous testimony, as I strongly believe that if the Judges were fully appreciative of the consequences faced by me for failing to testify truthfully, they would understand why doing so would not merely be imprudent, it would be insane.

Pre-Incarceration

Prior to my conviction, by all accounts I was a successful practicing attorney in the entertainment industry, well-regarded by my peers. Despite this success, I struggled financially. When I first engaged in the activity for which I was convicted, it was because of this financial struggle. I had contacted the owner of the single television program for which I ultimately received royalties, solicited it to be an agent for the collection of such royalties, and was rejected. As much out of irritation, I falsely submitted a claim for the program, understanding that no party was making a claim for such program, and that such program royalties would be forfeited if not claimed.

After the filing of only a handful of forms, a check in the sum of approximately $80,000 was sent to me by the Motion Picture Association of America. At such point, I was both anxious and concerned. I believed that if I did not deposit the payment, unnecessary attention would be drawn to the situation and the crime revealed. Rationalizing the matter, I told myself that the appropriate claimant would not receive the royalties for failure to have applied, and that such payment would resolve all my financial concerns. Consequently, I deposited the payment.

Based on the false claims received prior to receipt of the check, I continued to receive more payments, in varying amounts. Eventually, however, I learned that

my misdeeds were being scrutinized by the legal authorities. Not wanting to exacerbate the matter, and prior to any contact by the legal authorities, I contacted such authorities in 2001 and confessed everything that I had done. I did so without the protection of a plea agreement, taking responsibility for all my acts and the acts of several other persons that were involved, subject only to the gentleman's agreement that no other persons would be prosecuted for the criminal acts for which I ultimately felt responsible.

The initial response of the legal authorities was to inform me that, while they appreciated my candor, it would be necessary for me to be convicted of a yet-to-be-defined crime, and likely be sentenced to eight months probation. Following this encounter, I merely waited, my attorney being periodically reassured that the matter was of such low priority to the U.S. Attorneys Office that they found no reason to move it along. Unfortunately, in October 2001 and well after my revelation to federal authorities, the scandal involving Enron Corporation occurred. The fallout was an edict by the Attorney General John Ashcroft to declare that all white collar criminal defendants would be treated in the harshest of manner in order to instill a greater sense of confidence by the American public.[1] Immediately

[1] The edict issued by Attorney General John Ashcroft was comparable to the directive recently issued by Attorney General Jeff Sessions, wherein U.S. Attorneys were instructed to prosecute to the full extent possible the potential

following the edict, I was contacted by the U.S. Attorneys Office and informed that their anticipated sentence of eight months probation would now be 18-24 months of actual prison time. Following formal acceptance of my guilty plea, U.S. District Court Judge Henry Kennedy sentenced me to 18 months incarceration, with three years probation, consistent with the U.S. sentencing guidelines that he was compelled to follow.

One significant aspect of my sentencing need be mentioned. In connection with my sentencing, on the advice of various legal counsel within the Copyright Office, the U.S. Copyright Office submitted a letter to U.S. District Judge Henry Kennedy requesting (i) that Raul Galaz "or any entity in which he has an interest" be forever banned from filing retransmission royalty claims or otherwise participating in any proceedings before the U.S. Copyright Office, whether for existing or future claims, and (ii) that the Judge deem all agreements between any royalty claimant and the company founded by Raul Galaz (Worldwide Subsidy Group, LLC) as subject to rescission. Effectively, the Copyright Office sought to scuttle WSG entirely for the unrelated prior criminal activity of one of its principals.

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charges against individuals arrested for drug related charges, reversing a policy instituted by Attorney General Eric Holder.

Notably, my criminal act did not involve WSG, predominately preceded the formation of WSG, and I was not even the majority owner of WSG. Nevertheless, the Copyright Office's request to Judge Kennedy, clearly sought to punish WSG because it was affiliated with me. In response, Judge Kennedy strongly rebuked the request of the Register of Copyrights, noted that he did not even have the authority to issue such a determination, and (contrary to the request of the Copyright Office) *affirmatively* held that I could continue to participate in the retransmission royalty proceedings subject only to the caveat that I would submit no claims on behalf of any party without first obtaining written authorization from such claimant. Specifically, Judge Kennedy was responding to the fact that I was an acknowledged expert in the field of retransmission royalties, and wanted to preserve my ability to continue working in such profession. To avoid any allegation that could subject me to possible violation, I consciously chose to not file any claims with the U.S. Copyright Office, *ever*, and have not filed a claim with the Copyright Office since at least July 2000.

What appears clear is that the Proposed Rule seeks to formulate criteria that is designed to apply only to WSG and myself, and therefor implement a sanction against WSG and myself that was expressly rejected by U.S. District Court Judge Henry Kennedy in 2002 and again in 2005. As such, this stands as the second

occasion in which governmental authorities have attempted to circumvent the ruling of Judge Kennedy. See infra.

Incarceration

As one might imagine, there is an extraordinary feeling of shame when one must inform the persons in one's life that one has been convicted of a crime, and will be sent to prison. My situation was not unique in that regard, and that conversation occurred with family members, friends, and neighbors. While unpleasant, the worst aspect of the situation was my separation from my children. At the time, they were 8 and 11 years old. Not wanting to expose them to my circumstance, I avoided having them brought to visit me for the initial six months of my sentence. My contact was therefore limited to a fifteen minute phone call that could only be partaken once on any given day. After the initial visit six months into my sentence, I was generally able to see my children once every 4-6 weeks, in the confines of the prison, of course.

Since my incarceration, I view with contempt the public's general belief that certain federal prisons are like "country club living". They are not. I was incarcerated in Three Rivers, Texas, which housed 200-300 inmates, and my experience included random body cavity searches, malnutrition, lacking medical care, summarily imposed punishments, and an astounding number of acts that are quite evidently designed to humiliate an individual.

Despite having the highest level of education of any individual at the prison, I was initially assigned what is considered the most menial job in the prison, a bathroom detail. I took it in stride, and after performing well for several months, was told that I would be assigned a job as an education tutor as an appreciation for my efforts. The job was commensurate with my capabilities, roughly half the inmates were illiterate, and I looked forward to the opportunity to help better persons' lives. The day before my scheduled reassignment, however, an individual in the prison submitted multiple formal grievances against the head of the prison camp. Believing that the inmate must have had help from an attorney, and me being the only attorney in the camp, suspicion and guilt was summarily placed on me. As what was no doubt intended as a punishment for something with which I was not involved, I was assigned the next day to the most physically demanding position at the camp. The position was typically assigned to youths that exhibit significant disciplinary problems. At 41, I was twice the age of any other person assigned the position, which involved laboring in fields in the extraordinary South Texas heat.

Because of the extreme physical requirements and the heat, it was necessary to wash my sweat-drenched clothes every day. In light of the physical requirements, the ability to intake calories was critical. Nonetheless, the source of all food at the prison was questionable, the amount was significantly restricted, and

I particularly recall one instance in which turkey legs were served from a box labeled "not for human consumption". I entered prison at my natural weight of 210 pounds. When I left prison I weighed 145 pounds, having lost approximately one-third of my body mass. Residual effects from my time in prison include current bouts with skin cancer from my exposure to the sun.

Life after incarceration

Life after incarceration is very different for different people. In my circumstance, I was repeatedly informed by probation officers that I could not apply for or take a variety of jobs, for a variety of specious reasons.[2] In fact, despite my education level, I was directed toward employment at a car wash and working for a telemarketer. Eventually, I obtained a position in construction. After several years, and with options limited, I began performing compensated work for WSG again.

Notwithstanding, my work for WSG did not commence smoothly. In 2005 and while I was still subject to supervised release, I informed my probation officer that I desired to provide uncompensated part-time services to WSG, assisting it with its royalties collection business. Despite the dictate of Judge Kennedy, the

[2] For example, I was denied the opportunity to work at a television station in a production capacity because my "crime involved television".

probation officer forbid me from engaging in such business. I consequently filed a motion with the sentencing court, informing it of the refusal of the probation officer to allow my participation in such business, and sought an order allowing my further participation. The order was opposed by the United States (on behalf of the Copyright Office) and the MPAA. Notwithstanding, on January 27, 2006, Judge Henry Kennedy issued an order reading as follows:

> **ORDERED** that this court's judgment must be interpreted and implemented in accordance with the plain meaning of the words employed to express it; and it is further
>
> **ORDERED** that Mr. Galaz is able to engage in the profession of television royalty collection during his period of supervised release, subject only to the restriction imposed by this court that he "file no further claims with the United States Copyright Office unless he presents written authorization from the company verifying his representation."

As is clear, the Copyright Office sought to altogether prohibit my involvement in the royalties collection industry (including CRB proceedings), and was rebuked, despite the relative recency of the conviction. No differently, the Proposed Rule currently seeks to altogether prohibit my involvement in the CRB proceedings as a consequence of the same acts that I engaged in almost two decades ago.

At every turn since my conviction, other parties have sought to take advantage of my prior criminal conviction for their personal profit, making

significant unsupportable allegations against me (and sometimes WSG and its principals) with no threat of consequence. In the most extreme circumstance, and after nine years of litigation, I was found liable for making a fraudulent transfer and found liable for approximately $770,000 that I never controlled or received.[3]

[3] The action was filed in 2008, and concluded in 2017. The initial judgment was for $1,770,000, however such portion of the judgment as was awarded to Julian Jackson (see discussion, infra) was reversed when the appellate court determined that the bankruptcy court had exceeded its jurisdiction by addressing disputes between Julian Jackson and myself.

Each and every pleading filed by my adversaries started by reference to my criminal conviction, which bore no relation to the matter. Despite the action moving back and forth between a bankruptcy court, a federal district court, and a federal appellate court on nine separate occasions, and despite the vocal protests of my legal counsel, on none of those nine circumstances would any of those courts address the single most significant item of evidence that exonerated me from any liability – emails demonstrating the "nominal" value of the transferred rights at the time of transfer (a fact attested to by the expert witnesses for *both* the plaintiff and defendants), and my attempts to transfer the rights on several occasions to unrelated third parties, which offers had been rejected because of the immaterial value of the rights.

A surreal experience existed by which a bankruptcy court judge issued approximately 100 rulings against me pursuant to various motions, *not once* ruling in my favor on the most trivial of matters. Once a final determination was issued by the bankruptcy court, the burden shifted, requiring me to establish that no evidence existed to possibly support any particular finding. Despite a wealth of unrefuted contradictory evidence, the district court refused to allow any personal appearances before it and, as part of its final review, *refused to even allow me to submit pleadings identifying the obvious bankruptcy court errors that were being appealed*. Ultimately, I was found to have engaged in a fraud for sending a demand letter to the co-owner of rights (Julian Jackson) at the address *required* by the company's Operating Agreement, i.e., a fraud for actually complying with an agreement, even after such co-owner testified that he had never informed me of an alternative address. The exonerating facts, while compelling, are not addressed in

Most recently, the Settling Devotional Claimants have presented this ruling to the Judges, arguing that it bears relevance to matters before the CRB.

More recently, in litigation to which WSG is suing a former client for breach of contract, the client alleged that following my incarceration I had "continued my thieving ways" and stolen $350,000 from such company. Notably, the client's own records revealed that all royalties had been appropriately accounted for, and it was demonstrated that I never even had access to WSG's financial accounts from which the monies were ostensibly placed into. For such evident reason, when faced with documentation in its own possession, the client's pleadings thereafter sat silent on the accusation, and the client never even counterclaimed in the same litigation for return of the "stolen $350,000". Cognizant that the "absolute litigation privilege" protected it from a defamation claim, the entity made its

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any of the several opinions that were issued, but are extensively detailed in the appellate briefs that were filed on my behalf.

Coincidentally, approximately two years into the litigation it was discovered that the attorney for my adversary, who was my ex-wife, had been the former law clerk of the bankruptcy judge, and his wife had been the administrative clerk for such bankruptcy judge. Conveniently, such facts were never brought to my attention by the bankruptcy judge, and were only revealed in a context that precluded a motion for recusal.

accusation against me with malicious knowledge of its falsity simply to influence the judge.[4]

My efforts to redress my past misdeeds include my agreement to garnish 25% of my income from WSG. Similar efforts include bringing suit to restore the status quo. One of the individuals that assisted in my crime and received a significant portion of what was illicitly obtained, an individual named Julian Jackson, refused to disgorge that amount and return it to the MPAA. Despite having written records of the conveyances, the identity of the individual, the individual's bank account, and my testimony, the U.S. Attorneys Office made no effort to either prosecute such individual or pursue this easy restitution. As such, following my release from incarceration, I took it upon myself to compel the individual's restitution to the MPAA, and brought suit against the individual to do so. At the trial court level, while opining that I had testified openly and honestly and that the defendant had falsely denied his participation in the criminal act, the trial court denied judgement on grounds of statute of limitations. When I appealed

[4] While the Judge indicated that such allegations had no influence on the matters before him, he nonetheless refused to strike such allegations as "scandalous", inaccurate, or irrelevant, on the (inaccurate) grounds that his ability to strike on such grounds was limited to "pleadings", i.e., the complaint and answer in the action. As such, forever appearing on the internet is the accusation made by the particular defendant that I have "stolen $350,000 from it", while I can neither seek the striking of such language, nor sue the entity for making a maliciously false allegation against me.

the matter, the appellate court affirmed the lower court determination, but on the grounds that I was attempting to "enforce an illegal contract". Amazingly, such was *never* a position taken by me, never appeared in briefs, and was simply a creation of the California appellate court. Nevertheless, since the date of the appellate court decision, parties regularly assert that I had the gall to sue an individual to "enforce an illegal contract".[5]

In what was perhaps the most surprising of situations, several years after I was released from incarceration I was appearing as a witness to a matter and was being deposed. In the course of the deposition, I was asked about my "disbarment" in California. I noted that I had never been disbarred, and that the deposer was mistaken, only then to be shown a copy of the order disbarring me on the basis of my criminal conviction *while* I was a practicing attorney. The matter made no sense because I had stopped practicing law years prior to my conviction, had moved from California three years prior to the conviction, and had gone "inactive" with the State Bar and later resigned my license prior to my conviction. What was subsequently revealed was remarkable. Even though records reflect that the MPAA apprised the State Bar of my criminal conviction within weeks of its occurrence, several years subsequent the MPAA renewed its efforts to enlist the

[5] In fact, the action was based on an equitable claim seeking to *undo* an illegal action, and was premised explicitly on case law endorsing such a theory of relief.

support of the California State Bar to seek disbarment of me, even though I had not been a licensed attorney for over six years. In the state of California, an attorney's resignation is not official until "accepted" by the California Supreme Court, a process that takes several months. What was discovered was that *six years* after my conviction, the State Bar filed a motion with the California Supreme Court asking it to "vacate" its acceptance of my resignation. Receiving no opposition, the Supreme Court obliged, whereupon the State Bar immediately instituted disbarment proceedings against me based on the fiction that for the prior seven years I had been a practicing attorney and was convicted of a felony during such time. Again, receiving no opposition, the California Supreme Court obliged.

The California State Bar, however, had falsely informed the Supreme Court that I had been served with the several pleadings leading to the disbarment. No fewer than ten pleadings were discovered that had been sent to me at an address at which I had not lived for over five years, and no information was brought to the attention of the Supreme Court as to the return of mail addressed to me at such address. Moreover, the disbarment process had occurred years after the limitations period had passed for such disbarment process and, on such grounds alone, would have been rejected as untimely.

After discovering my "disbarment" in the deposition referenced above, I filed papers with the California Supreme Court setting forth the truth of the

circumstances. As a result, and appropriately, upon consideration of the foregoing, the California Supreme Court "vacated" its prior order "vacating" acceptance of my resignation, thereby restoring the status quo. All of the foregoing was initiated by the hand of the MPAA prior to my significant involvement with the CRB proceedings in the event that I did subsequently participate in the CRB proceedings, for no purpose other than to hold me up as a "disbarred attorney" and, if the Judges recall, no denial or objection came from MPAA counsel when certain of these matters were testified to in prior CRB proceedings.

In sum, post-incarceration accusations of "fraud" and other malfeasance against me have become a frequent occurrence in any proceeding in which I am involved, including the CRB proceedings, no matter how attenuated my connection to a matter. My integrity is regularly assaulted, sometimes by covert means, by parties as part of their strategy to cast me as a habitual criminal and have such character assassinations published online. Moreover, WSG's adversaries have now broadened the scope of their allegations, accusing my family members and WSG counsel of fraudulent acts. While inaccurate, defending such allegations is distressing and, I believe, a basis for adjudicators believing that I am some sort of habitual criminal. That is, *allegations* of fraud in one context have been cited to support *allegations* in other contexts, then the latter are cited to support the former. Ultimately, I believe that seeing so much "smoke" makes adjudicators such as the

CRB believe that there must be "fire", regardless of how compelling evidence to the contrary may be.

The Judges' claimed "need" for the Proposed Rule.

It is in the foregoing light that I view the CRB's determination that I lied in 2015 CRB proceedings about the content of certain WSG files. That is, I view it as a determination based on no evidence other than the Judges' belief that I must be *presumed* to be lying, and to disregard any evidence to the contrary. *I did not lie*, by any stretch of the imagination, and when such determination was made by the current panel of CRB judges it infuriated me. No one enjoys defending themselves from false allegations, but the zeal by which I have maintained an honest lifestyle was clearly unappreciated and unknown by the Judges. Notwithstanding, the ostensible "lie", premised solely on a policy that was demonstrated to have not been followed by the CRB staff either with regard to its intake of 2008 satellite claims, its intake of 2008 cable claims, or any claims processed by the CRB over several years, made clear to me the contempt with which the current panel of Judges appear to hold me. This contempt is unwarranted, has been displayed by the current panel of Judges in a myriad of decisions, and, I believe, is now the basis offered as the "need" for the Proposed Rule.

In my mind, there is no question that the Proposed Rule is punitive in nature. It is not intended to address any problem with the standards and professionalism of parties participating in the CRB proceedings. Rather, it is solely for the purpose of punishing me for acts taken decades ago for which I have already been extensively punished (both formally and informally, openly and covertly), and for acts in which I never engaged. No different than my assignment to a manual labor detail in a south Texas prison, the Proposed Rule has been introduced to summarily punish me without a fair opportunity address the actions that ostensibly create a "need" for the Proposed Rule.

As was made clear to the Judges in one of my earliest appearances providing oral testimony, the fact that I have already been convicted of a felony means that any subsequent criminal act will result in an exacerbated sentence. What is clearly not appreciated by the Judges is that, knowing that any finding of "lying" or "perjury" will result in an *exacerbated* sentence against me under the federal sentencing guidelines, *WHY* would I ever risk engaging in any criminal act? The Judges concluded that I "lied" about the contents of a WSG file and the source of a particular document to avoid the consequence of denying certain 2008 satellite claims (*if* any program claims even existed for such claimants, which had not been determined) for WSG claimants appearing on four pages of a claim in only one of seventeen royalty pools being prosecuted at the time (*if* any program claims even

existed for such claimants, which had not been clearly determined). All things being equal, the "lie" would have been to preserve 2.35% of the royalties claimed by WSG in the particular proceeding, of which WSG typically receives 25% of the net revenues, i.e., 0.58% of the amount claimed by WSG (1/17 x 4/10 x .25 = .0058). Common sense reveals the irrationality of my perjuring myself, yet that is exactly what the Judges ascribed to me as having done - - engaging in an unethical criminal act to imperceptibly benefit the company for which I worked.

No doubt, there will be those who read this statement and believe that its primary purpose is to seek sympathy for what has already transpired. That would miss the point. The true purpose is to illustrate the fact that most persons, and likely the CRB Judges, only see a small part of the situation that drives personal motivations, and often reach conclusions based on a misimpression. That is what I believe has occurred here, in connection with the Judges' promulgation of the Proposed Rule. The Judges see an individual who committed a crime and at every turn is accused of having engaged in some other form of fraud, thereby making it all too easy for them to presume the worst and make findings that, if honestly considered, have no basis in reasonable fact. This is what I believe was the driving force behind the Judges conclusion in 2015 that I "lied" about the contents of the WSG file and the source of a particular document, one of the only two circumstances the Judges cite as a "need" for the Proposed Rule. The Judges do

not see an individual who has gone to extraordinary lengths to remedy a past misdeed, avoid even the opportunity for malfeasance, yet at every turn is accused of the same. Consideration of the motivations of the accusers comprehensively explains why this occurs.

CONCLUSION

On a personal note, I can say that the CRB proceedings have taken a great toll on my life. I try to slough off the frequent unwarranted allegations of misconduct, and tell myself that it is narcissistic to care so much about what others think. However, I cannot deny the anguish that sets in on me when unfairly accused of acts that I did not commit, am attributed motivations that I never even considered, and am forced to repeatedly refute far-fetched accusations against myself and associated persons that are fabricated by WSG's adversaries for no other reason than to increase their share of the retransmission royalties being distributed by the CRB.[6]

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[6] An example of this is revealed even in the Judges' announcement of the Proposed Rule in the *Federal Register*. Therein, at footnote 3, the Judges cite to the transfer of representation from WSG to Multigroup Claimants for 2010 and forward, citing to an allegation set forth *in a brief filed by the MPAA* that the "transfer to a family member doing business under a newly-registered business name, [was] perhaps with the intention of avoiding the loss of the presumption of validity." Literally nothing exists to validate such accusation, which is based on nothing more than the MPAA's open speculation as to the motivation for the

My feelings regarding my post-conviction involvement in the CRB proceedings range from the defiance I feel whenever I am faced with yet another false allegation of malfeasance (whatever that might be), regret for how my mere presence in such proceedings has exposed family members and legal counsel to unwarranted accusations, to the *satisfaction* that I am complying with promises that I made to claimants several years ago to prosecute their rights as professionally as I am able. However, what I do not feel, under any circumstance is shame for how I have conducted myself post-conviction.

I submit that the Proposed Rule need not be enacted.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Respectfully submitted,

May 22, 2017

_____/s/_____
Raul Galaz

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transfer. The accusation is patently false, the Judges do not have before them any evidence to support it, yet the Judges apparently consider the possibility of the allegation at this time, citing to it as though it may be accurate or may have some relation to the Proposed Rule.