



# EXHIBIT 31

1 A. That's right.

2 Q. Now, I want you to take a look at the  
3 Mediabase document. And the first artist listed on  
4 there -- this is a report by Mediabase on adds for  
5 WJKS-FM. Is that correct?

6 A. Yes.

7 Q. So it's reporting on the WJKS station. That  
8 is what has been added to its play list.

9 And what is the first item on it?

10 A. Beyonce, Run the World.

11 Q. So this is the same item that is referred to  
12 on the invoice 250. Isn't that correct?

13 A. Correct.

14 Q. Now, can you explain why your invoice says  
15 consulting, and Mediabase has it as an add?

16 A. I remember this, because this happened around  
17 midnight, and I was getting ready to go away with my son.  
18 And I ended up -- I was doing music at home, because I  
19 had to preschedule the station for the weeks that I was  
20 gone. And what I ended up doing is, I didn't have a  
21 current backup for QC Communications at home, but I had  
22 one for Q Media. So what I did temporarily was put it on  
23 Q Media, but I didn't send out the bill particularly to  
24 anyone. It didn't -- it didn't go out. But upon my

1 return it was -- ended up being billed to Kelvyn Ventour.

2 Q. For Q Media or QC?

3 A. For QC.

4 Q. Were any of the other artists listed on this  
5 page added?

6 A. They were all added.

7 Q. They were all added?

8 A. Yes. Mm-hmm.

9 Q. Despite the fact that the invoice talks about  
10 consulting?

11 A. Yeah. But I purposely left the "bill to"  
12 blank. It wasn't being billed to anyone so I can deal  
13 with it when I come back. But I wanted to get the  
14 money -- the money credited to the station. Because I  
15 think on April 27th, 2011, that might have been a  
16 Thursday or Friday.

17 Yeah, that was a Friday. That was a  
18 Friday. So --

19 BY MR. CHANIN:

20 Q. So when you came back, you did what, you  
21 billed it to QC?

22 A. I credited to QC and rebilled it to Kelvyn.

23 Q. For QC?

24 A. For QC.

# EXHIBIT 32

1 Q. Well, in the meantime, you acknowledge that  
2 this -- that the three particular songs here, or the  
3 three artists are listed -- I'm sorry, four. Are listed  
4 as adds on WJKS Mediabase list for April 22 --

5 A. Mm-hmm.

6 Q. -- 2011?

7 A. Yeah, these -- these were adds.

8 Q. They were adds?

9 A. Mm-hmm.

10 Q. It's a Q Media transaction, which these  
11 documents suggest?

12 A. Mm-hmm.

13 MR. GOLDLUST: Yes?

14 BY MR. CHANIN:

15 Q. And the check was deposited in the Q Media  
16 bank account?

17 A. Yes. But going back, this was reconciled,  
18 because it had no "billed to." And with the QuickBooks,  
19 I had to create another invoice, because you can't go  
20 back and edit something that's been reconciled already.

21 Q. What do you mean by "reconciled"? The money  
22 went into the Q Media bank account, and the facility used  
23 to provide the service for which you were paid was WJKS?

24 A. Mm-hmm.

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