

SECTION 1.65(c) STATEMENT

The undersigned hereby certifies to the Federal Communications Commission (the “Commission”) under penalty of perjury that the following is true and correct:

1. Brandeis University (FRN: 0014342729) is the licensee of noncommercial educational Class D FM station WBRS, 101.1 MHz, Waltham, Massachusetts, FCC Facility ID No. 6638 (“WBRS” or the “Station”).
2. The University requested and received from the Media Bureau an extension of time until February 1, 2024, by which to conduct a survey of its officers and trustees for the Station’s 2023 biennial ownership report. In connection with such due diligence, the University identified a potential character matter for disclosure to the Commission pursuant to 47 C.F.R. Section 1.65(c).
3. Specifically, this Statement is being submitted to the Commission to report the following adjudication:

On September 1, 2023, a civil judgement on jury verdict was entered in Middlesex County Superior Court-Woburn in *Robin Nelson-Bailey* (Plaintiff) *vs. Brandeis University et. al.* (Defendants), Docket No. 1981CV01430 (date of complaint: May 20, 2019). The jury held that: Defendants Brandeis University, Stewart Uretsky (University Executive Vice President, Finance and Administration) and Larry Lewellen (then-University Interim Vice President of Human Resources) discriminated against the Plaintiff (the former University Vice President of Human Resources) on the basis of her race and gender; and that Defendants Brandeis University, Stewart Uretsky, Larry Lewellen and Ronald Liebowitz (University President) retaliated against the Plaintiff after she engaged in protected activity. A request for judgment notwithstanding the verdict submitted by the University was denied and the University has decided not to further appeal the judgment.

4. WBRS has a long history of serving the University’s students and the public. After prior operations as a carrier-current campus facility, WBRS was licensed by the Commission as a Class D FM noncommercial broadcast station in 1968. In the present era, day-to-day operations of the Station are conducted by students and members of the Station’s volunteer cooperative, none of whom

participate in Station operations as employees of the University, and thus are not subject to employee review by the Vice President of Human Resources, or by the staff of the University's Department of Human Resources. The University's Dean of Students is the advisor to the Station, providing oversight of its operations.

5. The University has approximately 1900 employees. The Plaintiff, as the University's former Vice President of Human Resources, did not manage, oversee or direct the Station's volunteer staff. Nor is the University aware of any specific interaction of the Plaintiff during her tenure with the Dean of Students in connection with the Dean's oversight of the Station. Furthermore, no conduct relating to the management, operation or administration of the Station was the subject of the Plaintiff's lawsuit.

Respectfully submitted,

Brandeis University

By: _____

Printed Name: Stewart Uretsky

Title: EVP, Finance & Administration

Date: 01/25/24