

**BROADCAST EEO PROGRAM REPORT EXHIBIT FOR
DISCRIMINATION COMPLAINTS FILED DURING THE LICENSE TERM**

KTBS, LLC (“licensee” or “KTBS”) has responded in the affirmative to the Broadcast Equal Employment Opportunity Program Report Question that asks: “Have any pending or resolved complaints been filed during this license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the station(s)?” Accordingly, the licensee provides the following information regarding four employment issues that arose during the license term:

(1) Complainant Rhonda Lee:

Ms. Rhonda Lee, previously employed by KTBS as a meteorologist, anchor, and weather reporter, was terminated for violating KTBS’s social media policy. Ms. Lee filed an EEOC charge with the U.S. Equal Employment Opportunity Commission on May 8, 2013 (EEOC Charge No. 461-2013-00504). Later, after the EEOC issued a right-to-sue letter without any cause determination, on May 28, 2014, Ms. Lee filed a petition in Louisiana’s 1st Judicial District Court (case no. 577,079-C). Ms. Lee’s allegations were against George Sirven, KTBS station manager, and Randy Bain, KTBS news director, alleging race discrimination, whistleblower-retaliation, intentional infliction of emotional distress, and defamation. She amended her state-court petition in September, 2014, adding new federal law claims arising under Title VII of the Civil Rights Act; KTBS removed the suit to the U.S. District Court for the Western District of Louisiana, Shreveport Division (case no. 5:14-cv-02865), in October 2014. The matter was resolved by settlement with no admission of liability in a mediation conference on July 20, 2015.

(2) Complainant Chris Redford:

Mr. Chris Redford, previously employed by KTBS as a multimedia journalist, was terminated for violating KTBS’s social media policy. Mr. Redford filed an EEOC charge with the U.S. Equal Employment Opportunity Commission on May 8, 2013 (EEOC Charge No. 461-2013-02191). Later, after the EEOC issued a right-to-sue letter without any cause determination, on November 28, 2013, Mr. Redford filed suit in the U.S. District Court for the Western District of Louisiana, Shreveport Division (case no. 5:13-cv-03156). Mr. Redford’s allegations were against George Sirven, KTBS station manager, and Randy Bain, KTBS news director, alleging his termination was a pretext to provide KTBS with a defense to any potential claims based on racial and/or gender discrimination that might be raised by Rhonda Lee, a black female reporter who was fired on the same date for allegedly violating KTBS’s social media policy. On March 25, 2014, Mr. Redford filed an additional suit in the U.S. District Court for the Western District of Louisiana, Shreveport Division (case no. 5:14-cv-00640), alleging impermissible withholding of overtime compensation. Both cases were resolved by global settlement with no admission of liability in a mediation conference on February 11, 2016.

(3) Complainant Jon DuPre:

Mr. Jon DuPre, previously employed by KTBS as an anchor, reporter, and multimedia journalist, filed an EEOC charge with the U.S. Equal Employment Opportunity Commission on January 19, 2019 (EEOC Charge No. 461-2019-00807). Mr. DuPre's allegations were against George Sirven, KTBS station manager, Randy Bain, KTBS news director, and Alison Lorrain, anchor, reporter, and multimedia journalist, alleging sexual harassment and discrimination.

In early July, 2018, a female reporter was hired to co-anchor with Mr. DuPre. KTBS received and investigated a complaint of unwelcome advances and other inappropriate conduct regarding Mr. DuPre's actions toward his co-anchor. KTBS management instructed Mr. DuPre to immediately stop any further inappropriate or harassing behavior pending the investigation and to not discuss the complaints with any other employee. Because Mr. DuPre did not follow those directives, he was terminated on August 30, 2018.

The EEOC dismissed the charge on November 5, 2019. Mr. DuPre had 90 days from receipt of the notice in which to file suit. No suit was ever filed. This matter has been closed.

(4) Complainant Tara Brando Sullivan

Ms. Sullivan, previously employed by KTBS as a multimedia journalist, filed an EEOC charge with the U.S. Equal Employment Opportunity Commission on October 11, 2017 (EEOC Charge No. 461-2018-178) and, later, on June 20, 2019, a suit in the U.S. District Court for the Western District of Louisiana, Shreveport Division (case no. 5:19-cv-00784). Ms. Sullivan's allegations were against George Sirven, KTBS station manager, Randy Bain, KTBS news director, and Sherrie McCallie, KTBS administrator and controller, alleging discrimination due to disability.

Several months after Ms. Sullivan was hired, she collapsed while covering tornado damage in Canton, Texas. In the following weeks, Ms. Sullivan, Ms. Sullivan's mother, and Ms. Sullivan's doctors all indicated that she likely suffered a seizure and that she was restricted from driving for at least six months. Driving is and was an essential function of Ms. Sullivan's position at KTBS, given that multimedia journalists generally work alone and are therefore responsible for driving to story locations to conduct interviews and fact-finding. Put differently, without the ability to drive, Ms. Sullivan could not go out and report the news. KTBS had no choice but to terminate Ms. Sullivan due to the length of her restriction, but invited her to reply once she was released from her doctor. Sullivan filed the charge and suit indicated above.

The EEOC charge was dismissed and Sullivan was issued a right to sue. The federal suit is pending—discovery has closed and, on October 13, 2020, KTBS filed a motion for summary judgment to dismiss all claims with prejudice. The motion is fully briefed and awaiting disposition by the Court. No other deadlines are currently set.