

**EXHIBIT B**  
**Sworn Declaration of Claire Goodyear**

1. The undersigned is co-chairman of Our Lady of the Snows Foundation, Inc., applicant seeking authorization to launch a new NCE FM radio facility in Ketchum, Idaho.
2. I have read the foregoing Opposition to Petition to Deny, as well as the captioned Application and its exhibits and supporting documentation.
3. I have reviewed in particular the following:
  - (a) All claims regarding the nonprofit and educational nature of the applicant, which is indeed a nonprofit entity and in good standing with the State, and which has an educational component to its mission and activities;
  - (b) All claims regarding the applicant's location, as well as the origination and duration of that location, with an established local presence in Ketchum, Idaho;
  - (c) All claims regarding the applicant as an incorporated extension of the previously unincorporated foundation, itself an arm of the unincorporated school, and the school being a decades-established ministry of the Catholic church.

I hereby declare, under penalty of perjury, that the foregoing are true and correct to the best of my knowledge.

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Claire Goodyear

Date: December 5, 2022