

EXHIBIT 1



TEXAS TECH UNIVERSITY
HEALTH SCIENCES CENTER

School of Medicine
Office of Student Affairs

November 9, 2023

Kevin Bass, Ph.D.

[REDACTED]
Lubbock, Texas 79414

RE: Notice of Consolidation of Outstanding Student Matters

Dear Dr. Bass:

As of November 9, 2023, you are a party to multiple outstanding student matters, some of which are interrelated, at Texas Tech University Health Sciences Center ("TTUHSC"). These outstanding student matters include complaints filed pursuant to the TTUHSC Student Handbook Code of Professional Conduct, complaints filed pursuant to TTUHSC School of Medicine Operating Policy 40.05, and referrals to the Student Promotions and Professional Conduct Committee ("SPPCC") under TTUHSC School of Medicine Operating Policy 40.04. This letter is to notify you that TTUHSC is consolidating the administrative proceedings corresponding to the complaints and referrals into a single consolidated administrative proceeding (the "Consolidated Hearing") in which you will have the opportunity to address the circumstances at issue under the various complaints and referrals. Further, this letter seeks to notify you of the procedures that will apply to the Consolidated Hearing.

In any administrative proceeding involving its students, TTUHSC understands the need to proceed with efficacy for the sake of affording its students a prompt and fair resolution to filed grievances and complaints. In this instance, given the volume of outstanding matters to which you are a party, and as you are currently on an interim suspension pending resolution of these matters, TTUHSC is especially conscious of the need to proceed efficiently in reviewing the outstanding matters. To this end, the complaints and referrals to which you are a party are to be addressed in the Consolidated Hearing. Having a Consolidated Hearing makes it feasible for TTUHSC to afford you a prompt and fair resolution as required by TTUHSC policy.

To ensure that you are afforded maximum due process, the Consolidated Hearing will proceed according to the Student Conduct Board hearing procedures as set forth in the TTUHSC Student Handbook, Part II Code of Professional Conduct (<https://www.ttuhsc.edu/student-affairs/documents/StudentHandbook.pdf>).

Below are the current outstanding student matters to which you are a party that may be addressed in the Consolidated Hearing. As noted above, they include Student Code of Professional

Conduct complaints, complaints filed pursuant to TTUHSC School of Medicine Operating Policy 40.05, and referrals to the SPPCC pursuant to TTUHSC School of Medicine Operating Policy 40.04. With regard to the complaints filed under Operating Policy 40.05, as you were previously notified by Dr. Conser, you have ten business days, from the date you received the written statement of the recommendations of each direct overseer, to request a hearing. Should you request such hearing for any of the complaints, it will be incorporated into the Consolidated Hearing.

Student Code of Conduct:

1. Complaint filed by Caroline Fernandez on August 1, 2023.
2. Complaint filed by Jennifer Wilson on September 18, 2023.
3. Complaint filed by Jennifer Wilson on September 29, 2023.

School of Medicine Operating Policy 40.05:

4. Complaint filed by Kevin N. Bass on September 29, 2023.
5. Complaint filed by Kevin N. Bass on September 29, 2023.
6. Complaint filed by Kevin N. Bass on September 30, 2023.
7. Complaint filed by Kevin N. Bass on October 9, 2023.
8. Complaint filed by Kevin N. Bass on October 12, 2023.
9. Complaint filed by Kevin N. Bass on October 27, 2023.

SPPCC/School of Medicine Operating Policy 40.04:

10. Psychiatry: "1" Professionalism
11. Pediatrics: "1" Professionalism
12. Pediatrics: "1" Professionalism
13. Pediatrics: "1" Professionalism
14. Pediatrics: "1" Professionalism
15. Pediatrics: "1" Professionalism

A subsequent letter with additional information regarding the date, location, and names of the Board of the Consolidated Hearing members is forthcoming. TTUHSC desires that you have sufficient time to prepare for the Consolidated Hearing and an opportunity to adequately address all of the claims being reviewed at the Consolidated Hearing. Pursuant to the TTUHSC Student Handbook, the parties to a hearing and the Student Conduct Administrator may agree in advance, and in writing, to procedural deviations, such as deadlines for submission of evidence and hearing dates and times. If you believe it is in your best interest to accelerate dates or deadlines related to the Consolidated Hearing, TTUHSC will endeavor to reach an agreement with you regarding such procedural deviations.

If you have any questions about the subject of this letter or the Consolidated Hearing you may contact Student Conduct Administrator, Dr. David Trotter.

Sincerely,



David RM Trotter, Ph.D.
Assistant Dean for Student Affairs (SOM)
Associate Professor, Department of Family and Community Medicine
And Department of Medical Education



Elisabeth Conser, M.D.
Assistant Dean for Student Wellness and Advancement
Associate Professor and Clerkship Director of Pediatrics

Enclosures

CC: file