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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**

15 JOHN DOE on behalf of his minor
16 daughter JANE DOE, JESSICA ROE,
and FELLOWSHIP OF CHRISTIAN
17 ATHLETES, an Oklahoma corporation,

18 Plaintiffs,

19 vs.

20 SAN JOSE UNIFIED SCHOOL
21 DISTRICT BOARD OF EDUCATION,
in its official capacity, NANCY
22 ALBARRÁN, in her official and
23 personal capacity, HERB ESPIRITU, in
his official and personal capacity, and
24 PETER GLASSER, in his official and
personal capacity.

25 Defendants.
26

CASE NO. 5:20-cv-2798

JUDGE:

**COMPLAINT FOR PRELIMINARY
INJUNCTION, PERMANENT
INJUNCTION, DECLARATORY
RELIEF AND DAMAGES**

DEMAND FOR JURY TRIAL

27
28

1 Plaintiffs, JOHN DOE, on behalf of his minor daughter, JANE DOE, JESSICA
2 ROE, and FELLOWSHIP OF CHRISTIAN ATHLETES (collectively, “Plaintiffs”)
3 allege the following against Defendants, SAN JOSE UNIFIED SCHOOL DISTRICT
4 BOARD OF EDUCATION, in its official capacity, NANCY ALBARRÁN, in her
5 official and personal capacity, HERB ESPIRITU, in his official and personal
6 capacity, and PETER GLASSER, in his official and personal capacity (collectively
7 “Defendants”), and in support thereof, state as follows:

8 **PRELIMINARY STATEMENT**

9 1. Jane Doe, Jessica Roe, and the Fellowship of Christian Athletes (“FCA”)
10 (collectively, “Plaintiffs”) bring this action due to the unlawful and unconstitutional
11 religious discrimination by San Jose Unified School District (“the District”) and its
12 officials and employees in violation of the Equal Access Act (“EAA”) and First
13 Amendment. The District has revoked recognition of student groups affiliated with
14 FCA, taking away benefits previously enjoyed by the Student FCA Chapters and that
15 continue to be enjoyed by other noncurriculum-related student groups, and has
16 knowingly allowed and facilitated harassment of FCA students, including Roe and
17 Doe, by District faculty and other students because of their religious beliefs and
18 speech.

19 ***FCA is an international religious organization that promotes integrity,***
20 ***servicing, teamwork, and excellence.***

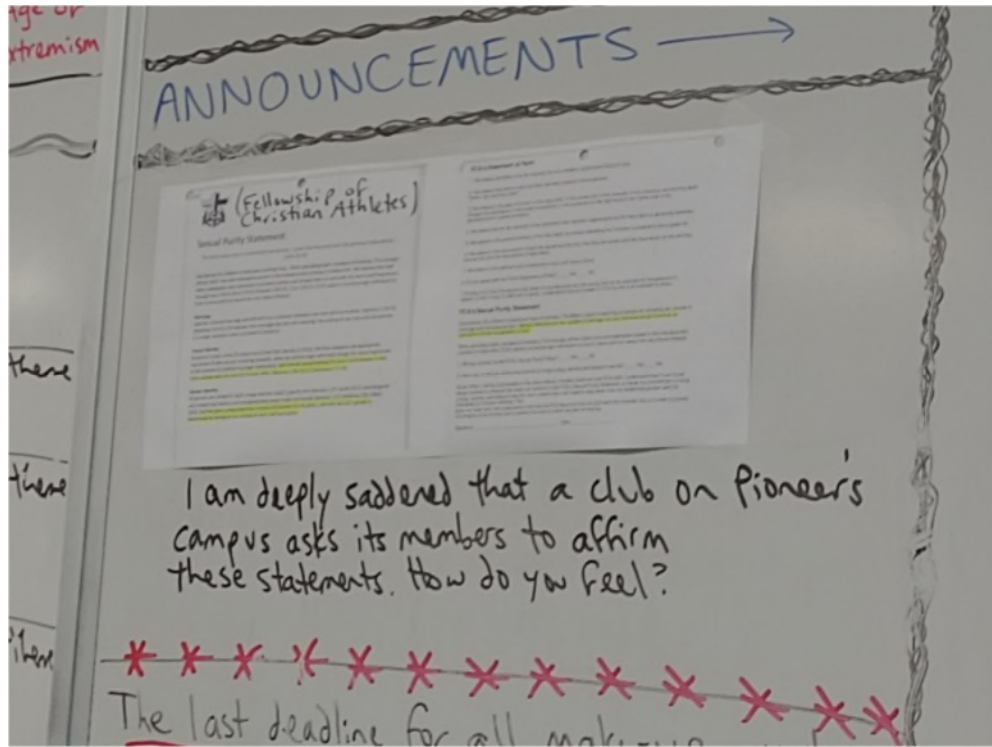
21 2. FCA is an international religious ministry with recognized student groups
22 on hundreds of public university and high school campuses across the country.
23 Students have organized student FCA chapters at three high school campuses within
24 the District for many years without incident: Pioneer High School (“Pioneer”),
25 Willow Glen High School (“Willow Glen”), and Leland High School (“Leland”)
26 (collectively, the “Student FCA Chapters”). FCA and the Student FCA Chapters
27 invite all students to attend and participate in its meetings.
28

1 3. FCA adheres to and expresses a core set of religious beliefs. These
2 beliefs are found primarily in the FCA Statement of Faith. Student members do not
3 need to agree with FCA’s core religious beliefs, but FCA’s student leaders must
4 affirm their agreement with these core religious beliefs and try to live consistent with
5 those beliefs.

6 ***The District has revoked recognition of the Student FCA Chapters***
7 ***because of their religious beliefs and speech.***

8 4. The District has recognized numerous noncurriculum-related student
9 groups in its secondary schools, each of which triggers the District’s duty to comply
10 with the EAA. For example, in the 2019-2020 academic year, over 50 noncurriculum-
11 related student groups are recognized at Pioneer High School alone including, but not
12 limited to, the following: Bachelor Nation; Black Student Union; Chess Club;
13 Communism Club; Dream Club; Dungeons and Dragons; Frisbee Club; Gender
14 Sexuality Association; Harry Potter Club; Interact Club; K-Pop Club; Key Club;
15 Latinx Club; Multicultural Club; Pacific Islander Club; Persian Club; PHS Ski and
16 Ride; Ping Pong Club; Politics Club; Shrek Club; Simply Cards; Tetris Club; and The
17 Satanic Temple Club. (See ¶ 48 for a full list of noncurriculum-related student
18 groups at Pioneer.) The Key Club, Interact Club, and Chess Club are classic examples
19 of student groups that automatically trigger the EAA’s requirement that a religious
20 student group be recognized. A true and correct copy of the list of student
21 organizations from the Pioneer website (as well as Leland and Willow Glen) is
22 attached as Exhibit A.

23 5. On April 23, 2019, Peter Glasser, a teacher at Pioneer, posted a copy of
24 FCA’s Statement of Faith and Sexual Purity Statement in his classroom with the
25 caption, “I am deeply saddened that a club on Pioneer’s campus asks its members to
26 affirm these statements. How do you feel?” Students affiliated with the Pioneer
27 Student FCA Chapter were students in Mr. Glasser’s classes at this time.
28



Mr. Glasser's Whiteboard

6. Despite complaints by the Pioneer FCA students to Mr. Glasser and to Pioneer Principal Herb Espiritu, Mr. Glasser's display remained posted in his classroom for a week.

7. District officials not only allowed Mr. Glasser to leave this hostile message posted, they adopted and expanded upon Mr. Glasser's statements. Despite FCA having existed on campus for years without incident, on May 2, 2019, no more than two weeks after Mr. Glasser posted his statements, Principal Espiritu informed the student leaders of the Pioneer FCA club that the Pioneer Student FCA Chapter would no longer be recognized on campus.

8. Soon afterward, District officials informed FCA student leaders at Leland and Willow Glen that schools in the District would no longer recognize the Student FCA Chapters. Officials at Willow Glen informed FCA student leaders that the school would recognize their religious student club on the condition they disassociated with FCA.

1 9. The District has violated and is violating the EAA and the First
2 Amendment through its revocation and continued denial of club recognition and its
3 associated benefits to the Student FCA Chapters because the District disfavors their
4 religious beliefs and speech.

5 ***The District has allowed and facilitated harassment of FCA students***
6 ***by faculty and other students.***

7 10. In addition, the District has targeted the FCA students for negative
8 treatment due to its disfavor of their religious beliefs and speech. The District has
9 adopted a practice of allowing and facilitating harassment of students affiliated with
10 FCA. Shortly after the District revoked recognition of the Student FCA Chapters,
11 Mr. Glasser and Principal Espiritu discussed strategies specifically intended to
12 prevent the Student FCA Chapters from existing in the District. District officials,
13 including Principal Espiritu, have also coordinated with students who oppose FCA's
14 religious beliefs in an effort to prevent the Student FCA Chapters from meeting at all
15 on campus.

16 11. District officials' coordination with students includes granting
17 recognition to The Satanic Temple Club, knowing that it was founded by students
18 who are opposed to the Student FCA Chapters' continued presence on campus. Mr.
19 Glasser also coordinated with Satanic Temple Club students about their intention to
20 harass the Student FCA Chapter.

21 12. The Satanic Temple Club formed for the first time at Pioneer at the
22 beginning of the 2019-2020 academic year. The District granted The Satanic Temple
23 Club's application for recognition while denying the Pioneer Student FCA Chapter's
24 application for recognition. The Satanic Temple Club's application for recognition
25 as an official student organization at Pioneer indicates that a primary purpose of the
26 club is to "protest." The Satanic Temple Club asked for permission to gather at the
27 same time as the Pioneer Student FCA Chapter, which the District granted.
28

1 13. Shortly after the first Pioneer Student FCA Chapter meeting of the
2 academic year, students affiliated with The Satanic Temple Club publicly announced
3 their intent to demonstrate immediately outside of the Pioneer Student FCA Chapter
4 meetings because of their disagreement with FCA's religious beliefs. Despite
5 requests from the FCA students and their parents to move the demonstration to
6 another location that would not subject FCA students to direct harassment, the
7 District did not do so.

8 14. District officials allowed these demonstrations to occur immediately
9 outside, and at the same time as, the FCA students' meetings despite the District
10 officials' and employees' expectation that the demonstrations would intimidate and
11 harass the FCA students. Mr. Glasser acknowledged that the situation violated the
12 FCA students' "sense of humanity and safety." Principal Espiritu acknowledged
13 that singling out the FCA students because of their religious beliefs could subject the
14 FCA students to undue harassment. Nonetheless, the District made no effort to
15 protect the FCA students from harassment, for example, by requiring the students to
16 keep a certain distance from those walking into the Student FCA Chapters or
17 requiring the protesting students to gather elsewhere or at a different time.

18 15. The protesting students' first organized attempt to harass and intimidate
19 FCA students occurred on October 23, when they gathered outside of the Pioneer
20 FCA meeting with signs disparaging the FCA students' religious beliefs, including
21 "HATRED IS NOT A RELIGIOUS BELIEF." The protesting students yelled at the
22 FCA students as they entered their meeting and remained directly outside their
23 meeting space during their meeting. Despite the FCA students' reasonable requests,
24 the District not only refused to take any action to mitigate the harassment, it
25 threatened to penalize the FCA students if they did not acquiesce in the protesting
26 students' harassment.

27 16. On November 6, 2019, student reporters for the school newspaper
28 entered the FCA meeting and took hundreds of pictures of the approximately 20

1 students attending the meeting. When the FCA students complained to Principal
2 Espiritu, he did nothing to stop this harassing and intimidating behavior. Instead,
3 Principal Espiritu told the FCA student leaders that if they did not allow pictures to
4 be taken during their meetings, they would not be allowed to have their individual
5 pictures in the school yearbook.

6 17. On December 4, 2019, faculty at Pioneer encouraged the protesting
7 students to harass the students who were attending the FCA meeting by entering the
8 room during their meeting. School Resource Officer Rick Granado intervened to keep
9 the protesting students from further harassing the FCA students at their meeting. On
10 information and belief, neither the faculty nor students involved have been
11 disciplined for their attempts to harass the FCA students before, during, and after
12 their meetings. Instead, the harassment of FCA students has continued unabated
13 regularly since this event.

14 18. Discrimination against FCA and its students by the District and its
15 officials demonstrates animus towards its religious message. Not only have District
16 officials and employees refused to recognize FCA, they have openly disparaged
17 FCA's religious beliefs and have allowed and encouraged other students to harass
18 and intimidate FCA students immediately outside of FCA meetings for the purpose
19 of harassing FCA students, in violation of its own written policy (but in accord with
20 accepted District practices) and California law.

21 19. The District's actions evince its open hostility toward FCA and its
22 religious values. Superintendent Albarrán was specifically informed of the District's
23 discriminatory acts against the Student FCA Chapters and approved the District's
24 continued discrimination. This hostility has led the District and Defendants to
25 illegally and unconstitutionally target FCA students and student leaders for
26 discrimination and harassment. The Court should order the District to restore full
27 recognition to the Student FCA Chapters as required by the EAA and the United
28

1 States Constitution, and to protect the FCA students from further harassment and
2 intimidation at the hands of District officials, employees, and students.

3 **PARTIES AND VENUE**

4 20. John Doe is domiciled in California and is the father of Jane Doe. John
5 Doe brings claims solely on behalf of Jane Doe, his minor daughter. Jane Doe is a
6 student in the District who actively participates in one of the Student FCA Chapters.
7 John and Jane Doe are domiciled in California.

8 21. Jessica Roe is a student in the District who actively participates in one of
9 the Student FCA Chapters. Jessica Roe is domiciled in California.

10 22. John and Jane Doe and Jessica Roe bring this suit against all Defendants
11 in their official capacities and against Superintendent Albarrán, Principal Espiritu,
12 and Mr. Glasser in their individual capacities.

13 23. Fellowship of Christian Athletes is a religious nonprofit corporation
14 incorporated in Oklahoma and whose principal place of business is in Missouri. FCA
15 brings this suit on behalf of itself and its student representatives and members in the
16 District. FCA has been recognized by the Internal Revenue Service as an
17 organization described in section 501(c)(3) of the Internal Revenue Code. FCA
18 brings this suit against all Defendants in their official capacities only.

19 24. San Jose Unified School District Board of Education is the governing
20 body of a school district within the state of California. The District lies entirely
21 within the jurisdiction of this court. Its executive office is at 855 Lenzen Ave., San
22 Jose, CA 95126.

23 25. Nancy Albarrán is domiciled in California and is the District's
24 Superintendent and chief executive officer. Ms. Albarrán is sued in her official and
25 personal capacity.

26 26. Herb Espiritu is domiciled in California and the principal of Pioneer High
27 School. Mr. Espiritu is sued in his official and personal capacity.
28

1 27. Peter Glasser is domiciled in California and a teacher at Pioneer High
2 School. He is sued in his official and personal capacity.

3 28. All Defendants are persons acting under the color of state law. 42 U.S.C.
4 § 1983.

5 29. Venue is proper in this court because a substantial part of the events or
6 omissions giving rise to Plaintiffs' claims occurred within the jurisdiction of this
7 Court. 28 U.S.C. § 1391. Additionally, all Defendants are domiciled or located
8 within the Northern District of California. *Id.*

9 **JURISDICTION**

10 30. This court has jurisdiction over this matter because Plaintiffs assert
11 causes of action, including civil rights causes of action, arising under federal statutes
12 and the U.S. Constitution. 28 U.S.C. §§ 1331, 1343.

13 31. This court has supplemental jurisdiction over Plaintiffs' state law claims,
14 which are related to Plaintiffs' claims arising under federal law. 28 U.S.C. § 1367.

15 32. This court has authority to issue the declaratory and injunctive relief
16 sought herein. 28 U.S.C. §§ 2201 and 2202.

17 **FACTUAL BACKGROUND**

18 ***FCA is an international religious organization.***

19 33. FCA was founded in 1954 as an international Christian ministry with the
20 mission "to lead every coach and athlete into a growing relationship with Jesus Christ
21 and His Church." <https://www.fca.org/aboutus/who-we-are/vision-mission>.

22 34. FCA has recognized student organizations on college, high school, and
23 middle school campuses across the country. Today, FCA has over 14,000 active
24 chapters in 84 countries. Many of these are on public university and high school
25 campuses across the United States.

26 35. FCA's organizational values include "demonstrat[ing] steadfast
27 commitment to Jesus Christ and His Word through Integrity, Serving, Teamwork,
28 and Excellence." <https://www.fca.org/aboutus/who-we-are/vision-mission>.

1 36. FCA has no membership requirements and welcomes anyone to
2 participate. With respect to leadership, FCA requires only that student leaders agree
3 and live in accordance with its core religious beliefs and religious standards as
4 expressed in the Student Leadership Application. Any student who applies for a
5 leadership position will be considered for leadership.

6 37. As part of its ministry, FCA performs charitable works nationwide. For
7 example, FCA and volunteers invested \$250,000 to develop a community center in
8 inner-city Baltimore to provide disadvantaged students a safe place to gather, study,
9 and play. [https://www.wmar2news.com/news/region/baltimore-city/new-park-](https://www.wmar2news.com/news/region/baltimore-city/new-park-heights-community-center-ties-together-work-and-worship)
10 [heights-community-center-ties-together-work-and-worship](https://www.wmar2news.com/news/region/baltimore-city/new-park-heights-community-center-ties-together-work-and-worship). FCA gatherings across
11 the country participate in humanitarian causes, such as food banks and Operation
12 Christmas Child, a ministry that provides Christmas gifts to children internationally.

13 38. FCA also performs charitable works in the Bay Area. The Bay Area FCA
14 and its students have been involved in numerous charitable works, including
15 Operation Christmas Child, providing sports camps for underprivileged children in
16 the Bay Area, and distributing sports equipment to underprivileged children in the
17 Dominican Republic and Haiti.

18 *Like many other religious organizations, FCA has a core set of beliefs*
19 *that it exercises and expresses through community, including its*
20 *chapter meetings.*

21 39. FCA has a statement of faith (“Statement of Faith”) that sets forth the
22 core religious beliefs that FCA exercises and expresses as a faith community. All
23 FCA representatives, including staff, volunteers, and student leaders, are required to
24 affirm the FCA Statement of Faith.

25 40. A true and correct copy of the FCA Statement of Faith is nd on page 6 of
26 the FCA Playbook, attached as Exhibit B. The Statement of Faith includes core tenets
27 of FCA’s religious beliefs. Each item in the Statement of Faith references biblical
28 passages from which the item is drawn.

1 41. For example, the first item in the Statement of Faith is “[w]e believe the
2 Bible to be the only inspired, trustworthy and true, without error, Word of God. (2
3 Timothy 3:16-17).”

4 42. The fifth item in the Statement of Faith is “We believe in the present
5 ministry of the Holy Spirit, who lives within and guides Christians so they are enabled
6 to live godly lives.” (John 14:15-26; John 16:5-16; Ephesians 1:13-14).”

7 43. The seventh item in the Statement of Faith is “We believe in the spiritual
8 unity of believers in our Lord Jesus Christ, that all believers are members of His body,
9 the Church. (Philippians 2:1-4).”

10 44. The eighth item in the FCA Statement of Faith is “We believe God’s
11 design for sexual intimacy is to be expressed only within the context of marriage.
12 God instituted marriage between one man and one woman as the foundation of the
13 family and the basic structure of human society. For this reason, we believe that
14 marriage is exclusively the union of one man and one woman. (Genesis 2:24,
15 Matthew 19:5-6; Mark 10:6-9; Romans 1:26-27, 1 Corinthians 6:9).”

16 45. FCA chapters meet regularly to advance the religious mission of FCA.
17 One of the primary purposes of these meetings is to transmit and reinforce the
18 religious beliefs of FCA as stated in the FCA Statement of Faith.

19 ***The District expresses open hostility to FCA’s religious beliefs.***

20 46. Prior to the events described herein, the FCA Student Chapters met
21 without incident for years at Pioneer, Willow Glen, and Leland, which are secondary
22 schools within the District that receive federal financial assistance. All acts by
23 employees or officials of the District and its secondary schools as alleged herein were
24 performed under color of law and pursuant to the policies, practice, and customs of
25 the District and its secondary schools or were adopted by a final policymaker for the
26 District or his or her delegate.

27 47. Pioneer recognizes approximately 51 noncurriculum-related student
28 groups, each one of which triggers the requirements of the EAA. Leland recognizes

1 approximately 70 noncurriculum-related student groups, and Willow Glen recognizes
2 approximately 35 noncurriculum-related student groups, each one of which triggers
3 the requirements of the EAA.

4 48. Examples of noncurriculum-related student groups that the District
5 recognizes at Pioneer include: Almaden Homework Club (helping elementary
6 students after school); Art Club (celebrating creativity and art); Bachelor Nation
7 (discussing the “Bachelor” television series); Baking Society (raising money for
8 charity); BC2M (“Bring Change to Mind,” raising awareness on mental health); Best
9 Buddies (building friendships with those with disabilities); Black and Blue Crew
10 (“amping up crowd” at sports events); Book Club (spreading the joy of reading); BSU
11 (“Black Student Union,” bringing black students together); Chess Club (teaching
12 students chess); Communism Club (discussing ideas of Communism); Cycling Club
13 (meeting up with other cyclists); Dream Club (discussing dreams and psychological
14 theories); Dungeons and Dragons (playing “Dungeons and Dragons”); Ecstatic Club
15 (learning new dance skills); Flora and Fauna (spreading awareness on environmental
16 issues); Folklorico (sharing traditional dance with the school); Frisbee Club (playing
17 Frisbee); Gifts for Teens (collecting items for homeless persons); Girls Learn Club
18 (increasing awareness on gender discrimination); Girls Who Code (closing gender
19 gap in tech); Green Team (helping clean up the environment); Gender Sexuality
20 Association (LGBTQ+ advocacy); Harry Potter Club (discussing Harry Potter);
21 Interact Club (international organization service club); K-Pop Club (discussing
22 Korean culture); Key Club (giving back to community through service); Latinx Club
23 (sharing cultural activities); Make a Difference Club (spreading awareness of world
24 problems); Mermaids Club (dancing and exploring self-expression); Multicultural
25 Club (learning about different cultures); Mustangs Handball (playing handball);
26 Noteworthy Notes (expressing musical interest); Pacific Islander Club (discussing
27 Pacific Islander culture); Persian Club (talking about Persian culture); PHS Ski and
28 Ride (going skiing and snowboarding); Ping Pong Club (playing ping pong); Pioneers

1 for Christ (supporting one another learning about Christ); Politics Club (talking about
2 politics); Positive Balance (anti-stress safe space for students); Pre-Med Society
3 (students who are interested in the medical field); Radio Club (allowing students with
4 own radio show); Save our Seas (fundraising for a business, “4Ocean,” which cleans
5 up the oceans); Shrek Club (talking about Shrek and Dreamworks); Simply Cards
6 (playing cards); Smash Club (playing Super Smash Brothers); Spikeball Club
7 (playing spikeball); Sports Medicine club (students interested in sports medicine);
8 Student Action Committee (encouraging activism in a positive way); Tech Deck club
9 (having fun with tech decks); Tetris Club (playing Tetris); UNICEF (fundraising for
10 children); and The Satanic Temple Club (practicing the Seven Tenets of the Satanic
11 Temple Club).

12 49. On or about April 23, 2019, Peter Glasser, a teacher at Pioneer, used his
13 classroom to express hostility to the religious beliefs of FCA. On that date, Mr.
14 Glasser put the FCA Statement of Faith and Sexual Purity Statement on the classroom
15 whiteboard. Under these statements, Mr. Glasser wrote, “I am deeply saddened that
16 a club on Pioneer’s campus asks its members to affirm these statements. How do you
17 feel?”

18 50. Mr. Glasser’s statements were specifically aimed at the religious beliefs
19 of FCA and its student leaders. Some FCA leaders and members, including Roe, were
20 students in Mr. Glasser’s classes during the week that his hostility toward their
21 religious beliefs was displayed on the classroom whiteboard. Mr. Glasser left this
22 display up in his classroom for at least a week despite concerns expressed by some
23 of his students, including students who were FCA leaders and members.

24 51. Despite complaints by FCA student leaders and other students to
25 Principal Espiritu and Mr. Glasser about the display and despite the violation of
26 District policy, no District employee or officer required Mr. Glasser to take down his
27 display or disciplined him. This was because District officials and administrators at
28 the District and Pioneer share Mr. Glasser’s hostility toward FCA’s religious views.

1 ***Pioneer and the District adopted and expanded Mr. Glasser’s hostile***
2 ***treatment of the FCA students due to their religious beliefs.***

3 52. Not only did the District refuse to discipline Mr. Glasser or order him to
4 take down his display, the District and its officers adopted, both formally and in
5 practice, Mr. Glasser’s hostile view toward the religious views of the Student FCA
6 Chapters. Mr. Glasser coordinated with Principal Espiritu and other District officials
7 to find justifications for the District to revoke recognition of the Student FCA
8 Chapters.

9 53. On May 2, 2019, less than two weeks after Mr. Glasser posted his
10 disparagement of FCA’s religious beliefs in his classroom, Principal Espiritu told
11 student leaders at Pioneer’s Student FCA Chapter that FCA would no longer be a
12 recognized student group at Pioneer. District officials made this decision without
13 any prior discussion with the FCA students. The decision to derecognize FCA was
14 accompanied by a statement that the District “does not sponsor programs and
15 activities with discriminatory practices.” Neither Principal Espiritu nor any District
16 official identified any discriminatory practices by the Student FCA Chapters. At the
17 same time, District officials informed FCA student leaders at Leland and Willow
18 Glen that neither the District nor their respective high schools would recognize them.

19 54. The denial of recognition results in the loss of numerous benefits
20 associated with recognition, including: access to faculty advisors; inclusion in the
21 school yearbook; access to Associated Student Body (“ASB”) funds; and other
22 benefits.

23 55. The District has targeted the Student FCA Chapters specifically for their
24 religious beliefs. District officials told students at Willow Glen that they could regain
25 recognition of their religious group by forming a new group not associated with FCA.
26 District officials told a member of the faculty at Leland that the Leland Student FCA
27 Chapter would not be recognized if it continued to require its leaders to approve the
28 FCA Statement of Faith. The FCA students at Leland were told they would only be

1 approved as an interest group, not as a club. Interest groups do not receive the benefits
2 associated with club recognition, such as access to ASB funds.

3 56. Although District officials recognized that the Student FCA Chapters
4 have a right to campus access under the EAA and other laws, District officials and
5 employees, including Mr. Glasser and Principal Espiritu, coordinated to find ways to
6 remove the Student FCA Chapters from the District high schools entirely.

7 57. Roe and Doe applied for club recognition at Pioneer as a Student FCA
8 Chapter for the 2019-20 school year. Their application was denied. Michelle
9 Mayhew, the Pioneer Activities Director, and the ASB president signed the denial of
10 the Pioneer Student FCA Chapter application. Principal Espiritu and Mr. Glasser
11 specifically took actions to ensure that the Pioneer Student FCA Chapter would not
12 be recognized. This denial was adopted by Superintendent Albarrán or her delegate.
13 For example, pursuant to District BP 3452, the principal of each school, Principal
14 Espiritu in this instance, is delegated responsibility for the distribution of club funds.

15 58. The Student FCA Chapters were recognized student groups for a number
16 of years and continue to meet all criteria to be a recognized student group. Defendants
17 derecognized the Student FCA Chapters because of the content and viewpoint of their
18 religious beliefs and speech. Because the Student FCA Chapters are not recognized
19 as student clubs by the District, they do not have the previously identified benefits
20 granted to recognized student clubs.

21 ***The District has approved of and facilitated attempts to harass and***
22 ***intimidate FCA students.***

23 59. Not only have the District and its high schools revoked and denied
24 recognition to the Student FCA Chapters, the school has approved and facilitated
25 harassment of FCA students by faculty and other students.

26 60. By way of example, District BP 3515.2 specifies that the “Superintendent
27 or designee shall provide for the prompt removal from school premises of any
28

1 individual who disrupts or threatens to disrupt normal school operations, threatens
2 the health and safety of students or staff, or causes property damage.”

3 61. Similarly, California Educational Code § 48900(r)(1) defines bullying as
4 “any severe or pervasive physical or verbal act or conduct . . . that has or can be
5 reasonably predicted to have the effect of one or more of the following: (d) causing
6 a reasonable pupil to experience substantial interference with his or her ability to
7 participate in or benefit from the services, activities, or privileges provided by a
8 school.”

9 62. Despite these policies, the District has allowed faculty and students to
10 harass and bully the students wishing to attend the Pioneer Student FCA Chapter
11 meetings, before, during, and after their meetings. District officials and employees
12 understood that the planned harassment would likely intimidate the FCA students.
13 FCA students expressed concerns to Principal Espiritu. These concerns were also
14 expressed in letters written by legal counsel to Principal Espiritu.

15 63. Following the District’s decision to revoke its recognition of the Student
16 FCA Chapters, Principal Espiritu spoke with students opposed to FCA about their
17 concern over FCA continuing to meet at Pioneer even as an unrecognized student
18 group. At least some of these students subsequently formed The Satanic Temple Club
19 at Pioneer. The District approved recognition of The Satanic Temple Club and
20 granted its request to meet at the same time as the derecognized Student FCA Chapter
21 met at Pioneer despite knowing that these students were planning to protest against
22 the FCA students’ meetings.

23 64. Principal Espiritu and other District officials, including Superintendent
24 Albarrán, have allowed some Pioneer students to harass and intimidate the FCA
25 students with impunity. On September 16, 2019, students associated with The Satanic
26 Temple Club passed out flyers announcing the intent to gather directly outside of the
27 meeting space for the Pioneer Student FCA Chapter’s meeting in order to denounce
28 the FCA students’ religious beliefs. When Principal Espiritu was asked to intervene

1 to prevent harassment of the FCA students, he initially indicated that any
2 demonstrations would be moved to an area away from the FCA meetings, but
3 ultimately refused to take any preventative actions.

4 65. District officials expected these protests to intimidate and harass FCA
5 students. Mr. Glasser and Principal Espiritu each understood that singling out the
6 Student FCA Chapters would subject FCA students to harassment. Nonetheless, the
7 District took no effort to prevent the harassment, for example, by maintaining a buffer
8 zone between the hostile protesting students and those students attending the FCA
9 meetings.

10 66. On October 23, 2019, Pioneer students attempted to harass, intimidate,
11 and prevent Pioneer FCA students from meeting. District officials, including
12 Principal Espiritu, were aware of the students' plans but did nothing to inform the
13 FCA student leaders or to stop the students' harassing and intimidating behavior. The
14 protesting students yelled at the FCA students as they were entering their meeting
15 and held signs disparaging their religious beliefs. District officials knew such
16 harassment would likely deter some Pioneer students from participating in FCA
17 meetings but allowed the harassment and intimidation to proceed.

18 67. On November 6, 2019, student reporters from the school newspaper, *The*
19 *Pony Express*, which has published editorials vilifying the Student FCA Chapters'
20 religious beliefs, entered the Pioneer Student FCA Chapter's meeting in a manner
21 calculated to harass and intimidate the FCA students. In the thirty-minute meeting,
22 the school newspaper's reporters took more than 300 pictures, standing only a few
23 feet from, and putting the camera into, the face of each student as he or she spoke.
24 When the Pioneer administration received complaints about the student reporters'
25 behavior, Principal Espiritu told FCA students that they would have no presence in
26 the yearbook, including their own individual photos, if they did not allow the students
27 acting on behalf of the school newspaper to take pictures at the FCA students'
28 meetings.

1 68. On December 4, 2019, protesting students, with the knowledge and
2 approval of District officials, attempted to harass the FCA students by intruding into
3 the classroom while they were meeting. At least one member of the faculty was
4 actively involved in this harassment and encouraged students to enter the meeting.
5 Only the intervention of the school resource officer prevented further harassment.

6 69. Though the intruding students were prohibited from entering due to the
7 officer's actions, they and faculty remained outside of the meeting room with the
8 intent to harass and bully the FCA students from holding or attending future meetings.
9 This attempt caused emotional distress for FCA members.

10 70. In February of this year, Principal Espiritu and Assistant Principal Amy
11 Hannah threatened to punish Jane Doe and Roe and other FCA students at Pioneer
12 for taking pictures of students harassing them, despite also telling the FCA students
13 that they would be punished for refusing to be photographed by students harassing
14 them.

15 71. Although specific incidents are described here in detail, similar
16 harassment of students in the Pioneer FCA Chapter, which includes Roe and Doe,
17 occurs nearly every FCA meeting.

18 72. Unfortunately, FCA students have not only been harassed by other
19 students. Faculty within the district have also openly disparaged their religious
20 beliefs and participated in the harassment of FCA.

21 73. As previously noted, Mr. Glasser wrote remarks disparaging FCA's
22 religious beliefs on the whiteboard in his classroom and then left them there for a
23 week. Mr. Glasser encouraged Pioneer students to pursue derecognition of the
24 Student FCA Chapter and denial of its application to be a recognized student group
25 in the 2019-2020 academic year. When a Stanford athlete came to speak to the
26 Pioneer Student FCA Chapter on September 25, Mr. Glasser met the athlete at the
27 desk where outside visitors sign-in and attempted to dissuade him from speaking to
28 the Student FCA Chapter, calling FCA a discriminatory group.

1 74. In addition, at least one other faculty member has encouraged and
2 participated in demonstrations aimed at disparaging FCA's religious beliefs and
3 harassing the FCA students before, during, and after their meetings. The teacher also
4 actively encouraged students to harass the FCA students as they entered, attended,
5 and left their meetings.

6 75. The actions of students and faculty hostile to FCA, as described above,
7 at a minimum, were reasonably predicted to harass, intimidate, and bully the FCA
8 students from meeting at Pioneer. In contrast, Principal Espiritu and Mr. Glasser
9 noted that the FCA students acted maturely with respect to the District's
10 disparagement of their religious beliefs.

11 76. Nonetheless, on information and belief, the District has taken no action
12 to discipline any student or faculty member for their attempts to harass and intimidate
13 the students who wish to participate in the FCA students' meetings.

14 ***The District Recognizes One or More Noncurriculum-Related Student***
15 ***Groups that Trigger the Requirements of the Equal Access Act.***

16 77. Pioneer, Willow Glen, and Leland are public secondary schools that
17 receive federal financial assistance and maintain a limited open forum for
18 noncurriculum-related student groups to meet. These schools are subject to the
19 authority and control of the District.

20 78. Pioneer, Willow Glen, and Leland recognize numerous noncurriculum-
21 related student groups and allow them to meet. Pioneer recognizes over 50
22 noncurriculum-related student groups, including Key Club, Interact Club, and Chess
23 Club, which are quintessential groups that trigger the EAA's requirement that a
24 religious student group be recognized and given the benefits afforded other
25 noncurriculum-related student groups meeting at the school. The recognized
26 noncurriculum-related student groups at Pioneer are listed in ¶ 48.

27 79. Leland recognizes approximately 70 noncurriculum-related student
28 groups, including Chess Club, Gender Sexuality Alliance/Gay Straight Alliance, and

1 Key Club, which are quintessential groups that trigger the EAA’s requirement that a
2 religious student group be recognized and given the benefits afforded other
3 noncurriculum-related student groups meeting at the school.

4 80. Examples of noncurriculum-related student groups that the District
5 recognizes at Leland include: 2050 (fundraising for the Environmental Defense
6 Fund); 4K Dance (focusing on K-Pop); Acts of Random Kindness (performing
7 random acts of kindness); Advocates for Disabled Adolescents through Projects and
8 Toys (“ADAPT”) (learning about genetic diseases and fundraising for a children’s
9 hospital); AI Club (teaching AI technology); Amnesty International Club (writing
10 letters and petitions about human rights); Anime Club (spreading appreciation for
11 Japanese culture); Art Club (participating in fun art-related activities); Aviation Club
12 (learning about aviation); Bare Necessities (collecting hygiene products for homeless
13 shelters); Bioinformatics Club (exploring biology and computer science); Black
14 Student Union (students of color sharing their school experiences); Bridge Club
15 (playing bridge); Calligraphy Club (lettering and calligraphy); CAN Club (assisting
16 local food bank); Card Games Club (playing card games); Charger Pals (building
17 relationships with special needs students); Chargers for the Cure (promoting healthy
18 living); Chess Club (playing chess); Cinema Club (discussing American film); Code-
19 matics Club (exploring math and computer science); Codementary (gathering
20 passionate coders); Creation Club (making unconventional art); Economics Club
21 (discussing economics); Entourage (student cheering section); Future Business
22 Leaders of America (preparing for business careers); Finance Club (educating about
23 personal and global economies); Game Club (playing games); Game Design and
24 Programming Club (developing games); Games Club of Leland (playing games);
25 Gaming to Give (raising money for non-profits); Girls Who Code (closing the gender
26 gap in engineering); Glee Club (performing music); Gender Sexuality Alliance/Gay
27 Straight Alliance (“GSA”) (discussing LGBTQ+ history and personal and social
28 issues); Handcrafted Club (crafting); Helping Hands (fundraising for Iranian

1 orphanages); Hockey Club (discussing hockey); Indian Heritage Club (promoting
2 Indian culture); International Club (exploring different cultures); Journey Around the
3 World (fundraising for Cambodian school); Key Club (providing service, building
4 character, and developing leadership); Ladki Love (fundraising for Indian children’s
5 education); Leland American Red Cross (teaching community disaster
6 preparedness); Leland Bring Change to mind (“BC2M”) (ending stigma around
7 mental health); Leland Girl Up (fundraising for girls’ education in third world
8 countries); Leland Junior State of America (discussing politics); Leland Medical
9 Club (pursuing medical careers); Leland Oceanic Preservation Club (educating about
10 the oceans); Leland Robotics 604 (competing in robotics competitions); Leland
11 STEM Club (inspiring younger students); Leland Women (creating empowered
12 women on campus); Linguistics Club (informing about linguistics); Liberty in North
13 Korea (“LINK”) (fundraising for North Korean refugees); Machine Learning and
14 Hackathon Club (teaching basic algorithms); Make A Wish (fundraising for the Make
15 A Wish Foundation); Math Club (participating in extracurricular math competitions);
16 Meditation and Stress-Reduction Club (practicing stress-reduction); Model United
17 Nations (preparing for model UN conferences); Music Club (playing music and
18 performing community service); National Honor Society (recognizing students for
19 scholarship, character, leadership, and service); Origami Club (folding origami);
20 Physics Club (preparing for physics competitions and tutoring other students);
21 Podcast Club (producing podcasts); Psychology and Neuroscience Club (exploring
22 psychology and neuroscience); Quiz Bowl (playing trivia); Save the Children
23 (fundraising and petitioning for national organization); Senior Women (helping
24 persons in need in the community); Students for the Environment (hosting
25 environmental community service projects); Students Rebuild (combining art and
26 philanthropy to make a difference in the community and globally); Table Tennis
27 (playing table tennis); and Youth Conservative Forum (exposing students to
28 conservative ideas).

1 81. Willow Glen recognizes over 30 noncurriculum-related student groups,
2 including Democratic Socialists of America, Key Club, and Interact Club, which are
3 quintessential groups that trigger the EAA’s requirement that a religious student
4 group be recognized and given the benefits afforded other noncurriculum-related
5 student groups meeting at the school.

6 82. Examples of noncurriculum-related student groups that the District
7 recognizes at Willow Glen include: Anime Club; Art Club; Black Student Body;
8 Book Club; Buddies Club; Christian Club; Clean Wave Club; Democratic Socialists
9 of America; Doki Literature Club (video game); Drama Club; Dubs Only (spirit
10 club); FIDM Club (“Fashion Institute of Design and Merchandising Fashion Club”);
11 Fighting Game Club; Film Club; French Club; Frisbee Club; Hack Club; Hacky Sack
12 Club (playing footbag game); Hiking Club; Ice Hockey; Interact; Invisible Issues
13 Club; Jewish Culture Club; Key Club; Latino Club and Dreamers; Model United
14 Nations Club; National Honor Society; Plus Club; Recycling Club; Robotics Club;
15 Showcase Club; Spikeball Club; Tabletop Club; The Environmental Protection Club;
16 Thespian Club; and True Crime Club.

17 83. District officials have denied and continue to deny recognition and its
18 associated benefits to the Student FCA Chapters in clear violation of the EAA.

19 ***The District recognizes student groups that trigger the FCA students’***
20 ***First Amendment right to meet to express their religious viewpoints.***

21 84. District officials recognize noncurriculum-related student groups at
22 Pioneer, Willow Glen, Leland, and other public secondary schools within the District
23 that trigger the EAA’s requirement that the District recognize the Student FCA
24 Chapters. Many of these same student groups are organized for purposes of
25 discussing certain viewpoints that separately and independently trigger the FCA
26 students’ constitutional right to meet. The District revoked recognition of the Student
27 FCA Chapters because it hopes to stifle viewpoints espoused by the Student FCA
28 Chapters.

1 85. For example, the District recognizes other student groups that discuss
2 religious or atheistic ideas and values, including The Satanic Temple Club, Pioneers
3 for Christ, and Communism Club at Pioneer, the Muslim Club and Shekinah
4 Christian Club at Leland, and the Jewish Cultural Club and Christian Club at Willow
5 Glen. The Student FCA Chapters discuss religious ideas and values from a specific
6 religious viewpoint.

7 86. The District recognizes student groups that discuss issues regarding
8 sexuality, such as the Gender Sexuality Association (Pioneer), Gay Straight Alliance
9 (Leland), and Sexuality and Gender Acceptance Club (Willow Glen). The Student
10 FCA Chapters discuss issues regarding sexuality from a specific religious viewpoint.

11 87. The District recognizes numerous student groups that discuss ways to
12 serve others in the community, including but not limited to: Almaden Homework
13 Club (tutoring elementary students); Baking Society (fundraising for charity); BC2M
14 (raising awareness regarding mental health); Best Buddies (friendships with persons
15 with disabilities); Castillero Math Tutoring (tutoring middle school students); Gifts
16 for Teens (collecting items for homeless persons); Green Team (cleaning up the
17 environment); Interact Club (an international service club); Key Club (giving back to
18 the community through service); Make a Difference Club (spreading awareness of
19 world problems); Positive Balance (providing an anti-stress, safe space for students);
20 Save our Seas (fundraising for ocean clean-up); Student Action Committee
21 (encouraging activism in a positive way); and UNICEF (fundraising for children).
22 The Student FCA Chapters discuss issues regarding how to serve others and their
23 community from a specific religious viewpoint.

24 88. The District recognizes student groups that are based on the specific
25 identity promoted by those groups, including: BSU (Black Students Union); Girls
26 Learn Club (increasing awareness on gender discrimination); Girls Who Code
27 (closing gender gap in tech); K-Pop Club (discussing Korean culture); Latinx Club
28 (sharing cultural activities); Pacific Islander Club (discussing Pacific Islander

1 culture); and Persian Club (talking about Persian culture). The Student FCA Chapters
2 discuss issues of identity and affinity from a religious viewpoint.

3 89. The District recognizes student groups that meet to discuss books they
4 have read, such as the Book Club, which exists to spread the joy of reading, and Harry
5 Potter Club, which meets to discuss the Harry Potter book series. Student FCA
6 Chapters encourage students to read and discuss the Bible, the best-selling book of
7 all time, from a religious viewpoint.

8 90. To the extent that the District relies on its nondiscrimination policy, such
9 reliance is pretextual. The District does not apply its nondiscrimination policies
10 uniformly. The District recognizes, supports, and even sponsors student groups and
11 activities that deny membership or leadership opportunities on the basis of students'
12 belonging to enumerated classes. For example, the District and Pioneer sponsor and
13 support numerous single-sex athletic teams. For example, Pioneer has Boys'
14 Wrestling teams, separate Girls' & Boys' Basketball teams, and Girls' Softball teams.
15 On information and belief, these teams discriminate on the basis of sex and gender
16 identity.

17 91. Similarly, the District has approved applications for numerous
18 noncurriculum-related student groups that have expressed gender, religious, or racial
19 membership or leadership requirements in their applications. For example, Pioneer
20 has recognized the "Big Sister/Little Sister" club, whose purpose is to "help freshmen
21 learn the school better and get advice from senior girls." Similarly, the Black Student
22 Association's purpose is "to bring black students together to strive for academic
23 excellence and promote positive images and defy stereotypes and to bring more
24 cultural and social events for black students to Pioneer."

25 92. On information and belief, officials within the District have advocated to
26 officials in other school districts that they not recognize FCA because of its religious
27 beliefs.

28

1 93. The District’s actions, including its refusal to recognize FCA and its
2 approval and acceding to student and faculty harassment toward FCA and its
3 students, have caused emotional distress to FCA students, including Jane Doe and
4 Roe.

5 *FCA student leaders lead religious activities at their meetings and*
6 *express the group’s religious message.*

7 94. Students interested in becoming FCA student leaders submit a student
8 leadership application. These student leadership applications are based on FCA’s
9 model student leadership application, although minor variations may be made by
10 FCA regional staffs. The Bay Area FCA Student Leader Application includes the
11 FCA Statement of Faith and FCA Student Leadership Statement. It also references
12 FCA’s Sexual Purity Statement. These statements lay out the core religious beliefs
13 of FCA and the qualifications expected of student leaders. A true and correct copy
14 of the Bay Area student leadership application is attached as Exhibit C.

15 95. In addition to asking whether student leadership applicants agree with the
16 Statement of Faith, the Bay Area FCA student leadership application asks applicants
17 to include relevant information about their Christian faith, including when they first
18 believed in Jesus, what it means to be a Christian, and why people go to Heaven.

19 96. Each student leadership application asks whether the student agrees to
20 conform to FCA’s Student Leadership Statement, which sets out requirements that
21 student leaders are expected to fulfill and states that student leaders are expected to
22 conduct themselves according to a higher standard. The Student Leadership
23 Statement provides as follows:

24 Just as “captains” are held to a higher standard for their team,
25 FCA Student Leaders are held to a higher biblical standard
of biblical lifestyle and conduct.

26 God desires all of His heart. Paul the Apostle instructed
27 young Timothy to live similarly in 1 Timothy 4:12 (NLT):
28 “Do not let anyone think less of you because you are young.

1 Be an example to all believers in what you say, in the way
2 you live, in your love, your faith, and your purity.”

3 FCA Student Leaders are not always perfect examples, but
4 they do their best to live and conduct themselves in
5 accordance with biblical values and instruction in order to
6 glorify God. If there are questions about what God says
7 regarding how we live our lives, FCA encourages student
8 leaders to look to the Bible as their Playbook and speak to a
9 FCA adult volunteer or staff member if there are further
10 questions.

11 97. The Bay Area FCA student leadership application further states that
12 “Each FCA representatives [*sic*] shall affirm their agreement with FCA’s Christian
13 beliefs and shall not subscribe to or promote any religious beliefs inconsistent with
14 these beliefs.” Additionally, “FCA Representatives shall at all times (both during
15 working and non-working hours) endeavor to conduct themselves in a manner that
16 affirms biblical standards of conduct in accordance with FCA’s Christian beliefs.
17 Such conduct standards include FCA’s Youth Protection Policy and Sexual Purity
18 Statement.”

19 98. Each FCA student leader must be “ready, willing and able to participate
20 and contribute to distinctly Christian activities such as worship and prayer services.”

21 99. FCA student leaders agree to abide by FCA’s Sexual Purity Policy. That
22 policy asks student leaders to abstain from any sexual acts outside of a marriage
23 consistent with FCA’s religious beliefs. The Sexual Purity Policy affirms that
24 “[w]hile upholding God's standard of holiness, FCA strongly affirms God's love &
25 redemptive power in the individual who chooses to follow Him. FCA’s desire is to
26 encourage individuals to trust in Jesus & turn away from any impure lifestyle.”

27 100. The Student FCA Chapters’ ability to express their Christian beliefs
28 would be significantly impaired if they were not allowed to require their leaders to
share their core religious beliefs and values. For example, because the Student FCA
Chapters are student-led, the student leaders choose the speakers, religious activities,
and religious message of each meeting.

1 101. FCA student leaders serve as ministers for FCA. The FCA Huddle
2 Playbook (“Playbook”) describes each FCA student club as a ministry. A true and
3 correct copy of the Playbook is attached as Exhibit D. The Playbook further indicates
4 that “As ambassadors of Jesus Christ, we are positioned as ministers of the Gospel to
5 the world.” *See* Exhibit D at 2.

6 102. As stated in the Playbook, “FCA is a Christian community *that is led by*
7 *those who serve FCA’s mission as its representatives, including all of FCA’s*
8 *directors, officers, employees, and volunteer leaders, each of whom is an integral*
9 *part of the community (and are described in this Manual as ‘FCA Representatives’).”*
10 *Exh. D at 7 (emphasis added).*

11 103. All FCA student leaders “must contribute to FCA’s Christian character
12 and mission” and are expected to “[u]se personal gifts and talents to help plan and
13 implement FCA ministry . . . including leading Bible Study Workouts.” *Id.* at 9.

14 104. Within FCA, the title “student leader” designates a ministerial role. For
15 example, FCA student leaders must apply for their positions and are selected for their
16 ability to demonstrate FCA’s religious beliefs in word and conduct. FCA student
17 leaders “are held to a higher standard of biblical lifestyle and conduct.” *Id.* at 58.

18 105. FCA Student Leaders apply for leadership positions, commit to being
19 held to a higher standard of biblical conduct, and typically lead their clubs in prayer
20 and Bible study.

21 ***The District’s discrimination against the Student FCA Chapters is***
22 ***intentional and pursuant to the policies, practices, and customs of the***
23 ***District.***

24 106. All of the discriminatory and unlawful acts taken by officials, employees,
25 and staff of the District, Pioneer, Willow Glen, and Leland, as alleged herein, were
26 pursuant to the policies, practices, and customs of the District and acting under color
27 of law. This includes actions that were performed by, approved by, or adopted by
28

1 Superintendent Albarrán as the District’s chief executive officer or her delegate or
2 other final policymaker.

3 107. When Principal Espiritu informed the FCA student leaders that the
4 Student FCA Chapters would no longer be recognized at Pioneer, his email cited
5 District policies. FCA student leaders for all Student FCA chapters within the District
6 were informed at or near this time that the District would not recognize a Student
7 FCA Chapter at any school because of instructions from the District.

8 108. Additionally, the Superintendent of the District, who is chiefly
9 responsible for interpreting and executing District policy, was informed in writing
10 about the revocation of FCA’s recognition as a student club and subsequent denial of
11 its recognition for the 2019-2020 academic year. Superintendent Albarrán was
12 expressly informed that the District’s decision to derecognize the Student FCA
13 Chapters violates federal law and the United States Constitution but continued to
14 approve of, and allow discrimination against, the Student FCA Chapters.

15 109. Pursuant to BP 2120 of District Policies and Regulations, Ms. Albarrán,
16 Superintendent of the District, is “the chief executive officer and educational leader
17 of the district.” Her edicts or acts may be fairly said to represent official policy for
18 the District. All events described herein occurred with her knowledge and approval
19 or the knowledge and approval of her designee, either through prior knowledge and
20 assent or through adoption of the actions taken by District employees.

21 110. The Superintendent has taken no action to correct this revocation and
22 rejection despite being informed of its illegality. The Superintendent has adopted the
23 denial of FCA recognition as consistent with and compelled by District policy,
24 practice, and custom.

25 111. Defendants’ actions were taken pursuant to official policy, as evidenced,
26 among other things by Principal Espiritu’s citations to District policy and the
27 District’s refusal to correct its actions and recognize FCA even after the illegality of
28 its decisions was pointed out.

1 112. All actions as alleged herein as performed by Principal Espiritu were
2 performed as the Superintendent's designee or with the approval of the
3 Superintendent. For example, pursuant to District BP 3452, the principal of each
4 school is delegated responsibility for the distribution of club funds.

5 113. All actions of district officials as alleged herein were made with the
6 approval of Superintendent Albarrán or a person to whom she has delegated authority
7 or other final policymaker, or pursuant to District policies, including without
8 limitation BP 0410 and BP 5145.3. To the extent not expressly performed by
9 Superintendent Albarrán, all actions by District officials alleged herein were made,
10 approved, or adopted by Superintendent Albarrán, her delegate, or another final
11 policymaker for the District.

12 114. Roe, Doe, and FCA have been directly affected by the events described
13 herein and have suffered mental anguish, including fear, anxiety, and loss of sleep.
14 Roe and Doe have also been deprived of rights granted them under the Equal Access
15 Act, the United States Constitution, and other federal law, as well as the California
16 Constitution and California law.

17 115. Pursuant to District Policy BP 0410,

18 The Governing Board is committed to equal opportunity for
19 all individuals in district programs and activities. District
20 programs, and activities, and practices shall be free from
21 discrimination based on gender, gender identity and
22 expression, race, color, religion, ancestry, national origin,
23 immigration status, ethnic group, pregnancy, marital or
24 parental status, physical or mental disability, sexual
orientation or the perception of one or more of such
characteristics. The Board shall promote programs which
ensure that any discriminatory practices are eliminated in all
district activities.

25 Any school employee who observes an incident of
26 discrimination, harassment, intimidation, or bullying or to
27 whom such an incident is reported shall report the incident
28 to the Coordinator or principal, whether or not the victim
files a complaint.

1 116. Pursuant to District Policy 5145.3:

2 All district programs and activities within a school under the
3 jurisdiction of the superintendent of the school district shall
4 be free from discrimination, including harassment, with
5 respect to the actual or perceived ethnic group, religion,
6 gender, gender identity, gender expression, color, race,
7 ancestry, national origin, and physical or mental disability,
8 age or sexual orientation. The Governing Board desires to
9 provide a safe school environment that allows all students
10 equal access to District programs and activities regardless of
11 actual or perceived ethnicity, religion, gender, gender
12 identity, gender expression, color, race, ancestry, national
13 origin, physical or mental disability, sexual orientation, or
14 any other classification protected by law.

15 **CONDITIONS PRECEDENT**

16 117. All conditions precedent have occurred, been performed, or were waived.

17 118. For all requests for declaratory relief asserted herein, a case and
18 controversy exists because Defendants have denied and continue to deny Plaintiffs'
19 rights, privileges, and immunities secured under the United States Constitution,
20 federal law, and California State law.

21 119. All actions performed by Defendants as alleged herein were malicious,
22 oppressive, and in reckless disregard for Plaintiffs' rights.

23 120. To the extent required by law, Plaintiffs have exhausted all
24 administrative remedies by alerting the District of the nature of their complaints
25 through correspondence, including correspondence on July 2, 2019 and January 14,
26 2020. The District has not timely responded to Plaintiffs' correspondence and the
27 relief requested therein is deemed denied by law.

28 **FIRST CAUSE OF ACTION**
42 U.S.C. § 1983
Equal Access Act 20 U.S.C. §§ 4071 et seq.

117. Paragraphs 1-120 are incorporated here by reference as if fully written
herein.

1 122. The Equal Access Act, 20 U.S.C. §§ 4071-4074, makes it unlawful for
2 “any public secondary school which receives Federal financial assistance and which
3 has a limited open forum to deny equal access or a fair opportunity to, or discriminate
4 against, any students who wish to conduct a meeting within that limited open forum
5 on the basis of the religious, political, philosophical, or other content of the speech at
6 such meetings.” § 4071(a).

7 123. Pioneer, Willow Glen, and Leland are public secondary schools that
8 receive federal financial assistance and are within the jurisdiction and control of the
9 District.

10 124. Pioneer, Willow Glen, and Leland each allow noncurriculum-related
11 student groups to meet during noninstructional time and thereby maintain a limited
12 open forum as that term is defined within the EAA.

13 125. Defendants, acting pursuant to the policies, practices, and customs of the
14 District, have revoked and continue to deny recognition of FCA student groups on
15 their campuses, thereby “deny[ing] equal access or a fair opportunity to, or
16 discriminat[ing] against,” the FCA students on the basis of the religious content of
17 their speech. This denial of recognition relegates the FCA students to second-class
18 status and denies them access to other resources that are granted to student groups
19 recognized as clubs.

20 126. Defendants have denied and continue “to deny equal access or a fair
21 opportunity to, or discriminate against” Plaintiffs’ right to meet as a recognized
22 student group because of the religious content of their speech.

23 127. District officials recognize they are bound by the EAA’s requirements
24 but nonetheless withdrew recognition from the Student FCA Chapters and
25 subsequently refused to recognize them as clubs despite the EAA’s requirements.
26 The rights of religious and other noncurriculum-related student groups to meet and
27 enjoy all the other benefits of recognition are well-established in the law, including
28 *Board of Education v. Mergens*, 496 U.S. 226 (1990), and *Prince v. Jacoby*, 303 F.3d

1 1074, 1086 (9th Cir. 2003) (“The School District discriminates against Prince and the
2 World Changers by denying them equal access to [ASB] funds.”).

3 128. Defendants’ actions were taken pursuant to official policy, as evidenced,
4 among other things by Principal Espiritu’s citations to District policy and the
5 District’s refusal to correct its actions and recognize FCA even after the illegality of
6 its decisions was pointed out.

7 129. Defendants’ actions, taken under color of state law, have denied Plaintiffs
8 rights and privileges secured under the EAA.

9 130. Plaintiffs Doe and Roe have suffered mental anguish due to Defendants’
10 unlawful actions and seek to recover damages.

11 131. Plaintiffs seek a declaration that Defendants’ actions violate the EAA and
12 injunctive relief prohibiting future acts in violation of the EAA. Without such
13 declaratory and injunctive relief, Defendants will continue to be irreparably harmed.

14
15 **SECOND CAUSE OF ACTION**

42 U.S.C § 1983

U.S. Const., amend. I, Free Speech Clause

Viewpoint Discrimination

16
17
18 132. Paragraphs 1-131 are incorporated by reference as if fully set out herein.

19 133. Governments “must not discriminate against speech on the basis of
20 viewpoint.” *Good News Club v. Milford Central Sch.*, 533 U.S. 98, 106 (2001);
21 *Rosenberger v. Rector & Visitors of the Univ. of Va.*, 515 U.S. 819, 829 (1995)
22 (“Viewpoint discrimination is thus an egregious form of content discrimination. The
23 government must abstain from regulating speech when the specific motivating
24 ideology or the opinion or perspective of the speaker is the rationale for the
25 restriction.”); *Lamb’s Chapel v. Center Moriches Union Sch. Dist.*, 508 U.S. 384
26 (1993).

27 134. District officials at Pioneer, Leland, and Willow Glen, acting under the
28 policies, practices, and customs of the District, recognize and grant benefits to

1 numerous student groups that meet to discuss a variety of topics discussed, including
2 religion, sexuality, books, and serving others and the community. *See, e.g.*, ¶¶ 48,
3 80, 82, 84-89, *supra*. Yet, these schools have refused to recognize the Student FCA
4 Chapters because of their religious viewpoints on these topics. The Student FCA
5 Chapters, whose meetings are initiated and led by student leaders, are being denied
6 recognition and its accompanying benefits that the school allows to other student
7 groups because of its disapproval of the Student FCA Chapters' religious beliefs as
8 expressed in their religious viewpoints.

9 135. The District also discriminates against the Student FCA Chapters'
10 viewpoint because it does not apply its nondiscrimination policies uniformly. The
11 District recognizes, supports, and even sponsors student groups and other activities
12 that deny membership or leadership opportunities on the basis of students' belonging
13 to an enumerated class.

14 136. The District also discriminates against Plaintiffs by knowingly and
15 intentionally allowing students and faculty to harass and bully them for the purposes
16 of chilling their speech. The District's refusal to act is intended to allow a "heckler's
17 veto" on FCA students' speech.

18 137. Defendants' actions were taken pursuant to official policy, as evidenced,
19 among other things by Principal Espiritu's citations to District policy and the
20 District's refusal to correct its actions and recognize FCA even after the illegality of
21 its decisions was pointed out.

22 138. Defendants' actions, taken under color of state law, have denied Plaintiffs
23 rights and privileges secured under the U.S. Constitution's First Amendment as
24 applied to the states through the 14th Amendment.

25 139. Plaintiffs Doe and Roe have suffered mental anguish due to Defendants'
26 unlawful actions and seek to recover damages.

1 140. Plaintiffs seek a declaration that Defendants' actions violate the First
2 Amendment and injunctive relief prohibiting future acts. Without such declaratory
3 and injunctive relief, Defendants will continue to be irreparably harmed.

4
5 **THIRD CAUSE OF ACTION**
6 **42 U.S.C. § 1983**
7 **U.S. Const., amend. I, Free Speech Clause**
8 **Right of Expressive Association**

9 141. Paragraphs 1-140 are incorporated by reference as if fully set out herein.

10 142. Meetings of the Student FCA Chapters, which are initiated and led by
11 student leaders, are a means of transmitting a system of religious beliefs and values
12 and are expressive by nature. *See Boy Scouts of America v. Dale*, 530 U.S. 640, 649-
13 50 (2000).

14 143. Plaintiff FCA, though its members and leaders, and Plaintiffs Roe and
15 Doe as student leaders within FCA, desire to associate together in ways that express
16 their Christian faith and the religious beliefs set forth in FCA's statements and
17 governing documents.

18 144. Plaintiffs' meetings are intended to instill, examine, and reinforce their
19 religious beliefs as expressed in FCA's governing documents and statements of core
20 religious beliefs and, therefore, are inherently expressive of their shared religious
21 beliefs.

22 145. Because Plaintiffs' meetings are intended to express religious messages
23 and religious viewpoints, the Student FCA Chapter leaders must agree with FCA's
24 core religious beliefs.

25 146. Defendants have violated Plaintiffs' right of expressive association by
26 denying recognition and its accompanying benefits to Plaintiffs because of the core
27 religious beliefs with which their leaders are required to agree.

28 147. By penalizing the Student FCA Chapters for requiring their leaders to
affirm their core religious beliefs, as expressed in FCA's statements of its core

1 religious beliefs and other governance documents, Defendants have interfered with
2 Plaintiffs' ability to choose their leaders and have unlawfully impaired Plaintiffs'
3 message. *Dale*, 530 U.S. 640.

4 148. Defendants' actions were taken pursuant to official policy, as evidenced,
5 among other things by Principal Espiritu's citations to District policy and the
6 District's refusal to correct its actions and recognize FCA even after the illegality of
7 its decisions was pointed out.

8 149. Defendants' actions, taken under color of state law, have denied Plaintiffs
9 rights and privileges secured under the U.S. Constitution's First Amendment as
10 applied to the states in the Fourteenth Amendment.

11 150. Plaintiffs Doe and Roe have suffered mental anguish due to Defendants'
12 unlawful actions and seek to recover damages.

13 151. Plaintiffs seek a declaration that Defendants' actions violate the First
14 Amendment and injunctive relief prohibiting future acts. Without such declaratory
15 and injunctive relief, Defendants will continue to be irreparably harmed.

16
17 **FOURTH CAUSE OF ACTION**
18 **42 U.S.C. § 1983**
19 **U.S. Const., amend. I, Religion Clauses**
20 **Denial of Generally Available Benefits**

21 152. Paragraphs 1-151 are incorporated by reference herein as if fully written
22 herein.

23 153. Under the Free Exercise Clause, "[d]enying a generally available benefit
24 solely on account of religious identity imposes a penalty on the free exercise of
25 religion that can be justified only by a state interest 'of the highest order.'" *Trinity*
26 *Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012, 2019 (2017) (quoting
27 *McDaniel v. Paty*, 435 U.S. 618, 628 (1978)).

28 154. Recognition and all its accompanying benefits are generally available
benefits for which Plaintiffs qualify within the District. Plaintiffs qualify for

1 recognition and its attendant benefits. Nonetheless Defendants have denied Plaintiffs
2 these generally available benefits because of their religious identity.

3 155. Defendants have targeted Plaintiffs for disparate treatment, including
4 lack of club recognition and its attendant benefits, because of their religious beliefs.

5 156. Defendants' actions were taken pursuant to official policy, as evidenced,
6 among other things by Principal Espiritu's citations to District policy and the
7 District's refusal to correct its actions and recognize FCA even after the illegality of
8 its decisions was pointed out.

9 157. Defendants' actions, taken under color of state law, have denied Plaintiffs
10 rights and privileges secured under the U.S. Constitution's First Amendment as
11 applied to the states in the Fourteenth Amendment.

12 158. Plaintiffs Doe and Roe have suffered mental anguish due to Defendants'
13 unlawful actions and seek to recover damages.

14 159. Plaintiffs seek a declaration that Defendants' actions violate the First
15 Amendment and injunctive relief prohibiting future acts. Without such declaratory
16 and injunctive relief, Defendants will continue to be irreparably harmed.

17
18 **FIFTH CAUSE OF ACTION**
19 **42 U.S.C. § 1983**
20 **U.S. Const., amend. I, Religion Clauses**
21 **Targeting of Religious Beliefs**

22 160. Paragraphs 1-159 are incorporated by reference herein as if fully written
23 herein.

24 161. Under the Free Exercise Clause, "a law targeting religious beliefs as such
25 is never permissible." *Trinity Lutheran*, 137 S. Ct. at 2024 n.4; *Church of the Lukumi*
26 *Babalu Aye v. City of Hialeah*, 508 U.S. 520, 533 (1993).

27 162. Under the First Amendment, the government "cannot impose regulations
28 that are hostile to the religious beliefs of affected citizens and cannot act in a manner
that passes judgment upon or presupposes the illegitimacy of religious beliefs and

1 practices.” *Masterpiece Cakeshop, Ltd. v. Colorado Civ. Rights Comm’n*, 138 S. Ct.
2 1719, 1731 (2018).

3 163. Additionally, government hostility toward religion violates the
4 Establishment Clause. *See Catholic League for Religious & Civil Rights v. City &*
5 *County of San Francisco*, 624 F.3d 1043 (9th Cir. 2010).

6 164. Defendants have expressly stated or adopted views hostile to the religious
7 faith of FCA and its student leaders and acted pursuant to such hostile views. These
8 views include statements that FCA’s religious beliefs are shameful and hateful.

9 165. In accordance with these views, Defendants have targeted Plaintiffs for
10 disparate treatment, including lack of recognition and its attendant benefits, as well
11 as knowingly allowing or encouraging faculty and other students at the school to
12 harass Plaintiffs for their religious beliefs despite having written policies against
13 harassment.

14 166. Defendants grant club recognition to other student groups despite those
15 groups’ exclusion of members or leaders based on classes enumerated in the District’s
16 nondiscrimination policies.

17 167. Defendants’ actions reflect animus toward Plaintiffs’ religious beliefs.

18 168. Defendants’ actions were taken pursuant to official policy, as evidenced,
19 among other things by Principal Espiritu’s citations to District policy, coordination
20 with students hostile to FCA’s religious values, and refusal to require Mr. Glasser to
21 take down his display disparaging FCA’s religious values.

22 169. Defendants’ actions, taken under color of state law, have denied Plaintiffs
23 rights and privileges secured under the U.S. Constitution’s First Amendment as
24 applied to the states in the Fourteenth Amendment.

25 170. Plaintiffs Doe and Roe have suffered mental anguish due to Defendants’
26 unlawful actions and seek to recover damages.

1 171. Plaintiffs seek a declaration that Defendants’ actions violate the First
2 Amendment and injunctive relief prohibiting future acts. Without such declaratory
3 and injunctive relief, Defendants will continue to be irreparably harmed.

4
5 **SIXTH CAUSE OF ACTION**
6 **42 U.S.C. § 1983**
7 **U.S. Const. amend. I – Religion Clauses**
8 **Ministerial Exception & Internal Autonomy**

9 172. Paragraphs 1-171 are incorporated by reference herein as if fully written
10 herein.

11 173. Under the Religion Clauses of the First Amendment, “it is impermissible
12 for the government to contradict a church’s determination of who can act as its
13 ministers.” *Hosanna-Tabor Evangelical Lutheran Church & School v. EEOC*, 565
14 U.S. 171, 185 (2012).

15 174. Ministers include “those who serve in positions of leadership, those who
16 perform important functions in worship services and in the performance of religious
17 ceremonies and rituals, and those who are entrusted with teaching and conveying the
18 tenets of the faith to the next generation.” *Id.* at 200 (Alito, J., concurring).

19 175. Similarly, religious organizations have the “power to decide for
20 themselves, free from state interference, matters of church government as well as
21 those of faith and doctrine.” *Kedroff v. Saint Nicholas Cathedral of Russian Orthodox*
22 *Church in N. Am.*, 344 U.S. 94, 116 (1952).

23 176. FCA is an international Christian ministry that includes student leaders
24 within its leadership structure.

25 177. At a minimum, FCA student leaders have titles denoting leadership, hold
26 themselves out as FCA leaders, and perform distinctly religious functions, including
27 leading Student FCA Chapter meetings in prayer, worship, and Bible study.

28 178. FCA student leaders are the primary way in which FCA fulfills its
religious mission on public school campuses. FCA leaders must agree with FCA’s

1 religious beliefs, including agreement with its statement of core religious beliefs and
2 other governing documents, in order to express the religious message and live in
3 accordance with those beliefs.

4 179. By denying club recognition to FCA because of its religious beliefs,
5 including its leadership requirements, Defendants interfere with Plaintiffs' First
6 Amendment rights to select their religious leaders.

7 180. To the extent Defendants have denied recognition to Plaintiffs due to
8 their religious leadership criteria, Defendants impermissibly entangle themselves
9 with Plaintiffs' religious beliefs and internal religious affairs.

10 181. Defendants' actions were taken pursuant to official policy, as evidenced,
11 among other things by Principal Espiritu's citations to District policy and the
12 District's refusal to correct its actions and recognize FCA even after the illegality of
13 its decisions was pointed out.

14 182. Defendants' actions, taken under color of state law, have denied Plaintiffs
15 rights and privileges secured under the U.S. Constitution's First Amendment as
16 applied to the states in the Fourteenth Amendment.

17 183. Plaintiffs Doe and Roe have suffered mental anguish due to Defendants'
18 unlawful actions as described herein and seek to recover damages for the same.

19 184. All Plaintiffs seek a declaration that Defendants' actions violate the First
20 Amendment and injunctive relief prohibiting future acts. Without such declaratory
21 and injunctive relief, Defendants will continue to be irreparably harmed.

22
23 **SEVENTH CAUSE OF ACTION**
24 **42 U.S.C. § 1983**
25 **U.S. Const., amend. I – Religion Clauses**
26 **Denominational Discrimination**

27 185. Paragraphs 1-184 are incorporated by reference as if fully set out herein.
28

1 186. As the Supreme Court held in *Larson v. Valente*, “[t]he clearest command
2 of the Establishment Clause is that one religious denomination cannot be officially
3 preferred over another.” 456 U.S. 228, 244 (1982).

4 187. Defendants officially recognize a number of religious or atheistic student
5 groups, including a Muslim Club and Shekinah Christian Club at Leland, The Satanic
6 Temple Club, Pioneers for Christ, and the Communism Club at Pioneer, and Jewish
7 Cultural Club and Christian Club at Willow Glen, and give them various benefits of
8 recognition that are not given the Student FCA Chapters. Defendants will not
9 recognize Student FCA Chapters because it disagrees with their religious beliefs.

10 188. District officials have indicated they would grant full recognition to the
11 Student FCA Chapters if they agree to change their religious beliefs and affirmations.
12 Officials at Willow Glen told students that the District would recognize a new
13 religious student club as long as it was not associated with FCA.

14 189. Defendants’ actions were taken pursuant to official policy, as evidenced,
15 among other things by Principal Espiritu’s citations to District policy and the
16 District’s refusal to correct its actions and recognize FCA even after the illegality of
17 its decisions was pointed out.

18 190. Defendants’ actions, taken under color of state law, have denied Plaintiffs
19 rights and privileges secured under the U.S. Constitution’s First Amendment as
20 applied to the states in the Fourteenth Amendment.

21 191. Plaintiffs Doe and Roe have suffered mental anguish due to Defendants’
22 unlawful actions as described herein and seek to recover damages for the same.

23 192. All Plaintiffs seek a declaration that Defendants’ actions violate the First
24 Amendment and injunctive relief prohibiting future acts. Without such declaratory
25 and injunctive relief, Defendants will continue to be irreparably harmed.

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EIGHTH CAUSE OF ACTION
42 U.S.C § 1983
U.S. Const., amend. I – Religion Clauses
Government Hostility Toward Religion

193. Plaintiffs incorporate Paragraphs 1 - 192 by reference as if fully set forth herein.

194. The First Amendment forbids an official purpose to disapprove of a particular religion or of religion in general. *See Catholic League for Religious & Civil Rights v. City & Cty. of San Francisco*, 624 F.3d 1043, 1054 (9th Cir. 2010).

195. Mr. Glasser, while in his capacity as a teacher, displayed a message specifically targeted at FCA’s religious beliefs and expressed disapproval of FCA’s religious beliefs. Mr. Glasser posted these statements on the whiteboard in his classroom. Mr. Glasser’s message disapproving FCA’s religious beliefs was highly visible to his students during classes for a week. FCA students were in his classes. Mr. Glasser spoke as a government employee, and any reasonable person would have understood Mr. Glasser to be speaking as a government employee for purposes of the Establishment Clause. *See Kennedy v. Bremerton Sch. Dist.*, 869 F. 3d 813, 827 (9th Cir. 2017) (noting that teachers are necessarily government speakers when they speak at school in the presence of students in a capacity one might reasonably view as official).

196. The District adopted Mr. Glasser’s hostility towards FCA’s religious beliefs. As a result, the District revoked recognition of the Student FCA Chapters due to its disfavor of their religious beliefs. On multiple occasions, District officials indicated that they would grant the FCA students recognition if they disavowed FCA’s religious beliefs.

197. Mr. Glasser and Principal Espiritu openly discussed strategies to remove the Student FCA Chapters from the District entirely because of their hostility towards

1 the religious beliefs of the Student FCA Chapters and the students who affirm those
2 beliefs.

3 198. Defendants' actions were taken pursuant to official policy, as evidenced,
4 among other things by Principal Espiritu's citations to District policy, coordination
5 with students hostile to FCA's religious values, and refusal to require Mr. Glasser to
6 take down his display disparaging FCA's religious values.

7 199. Defendants' actions, taken under color of state law, have denied Plaintiffs
8 rights and privileges secured under the U.S. Constitution's First Amendment as
9 applied to the states in the Fourteenth Amendment.

10 200. Plaintiffs Doe and Roe have suffered mental anguish due to Defendants'
11 unlawful actions as described herein and seek to recover damages for the same.

12 201. All Plaintiffs seek a declaration that Defendants' actions violate the First
13 Amendment and injunctive relief prohibiting future acts. Without such declaratory
14 and injunctive relief, Defendants will continue to be irreparably harmed.

15
16 **NINTH CAUSE OF ACTION**
17 **42 U.S.C § 1983**
18 **U.S. Const., amend. XIV – Equal Protection**
19 **Denial of Equal Protection**

20 202. Paragraphs 1 - 201 are incorporated here by reference as if fully set out
21 herein.

22 203. Defendants have penalized the Student FCA Chapters because of their
23 religious beliefs by denying them recognition and its attendant benefits because of
24 their religious beliefs while granting recognition and its attendant benefits to other
25 similarly situated student organizations.

26 204. The District's refusal to protect the legal right of the FCA students to
27 meet as a recognized student organization with all the benefits attendant on
28 recognition while according other student organizations their legal right to meet as

1 recognized student organizations with all the benefits attendant on recognition
2 violates the Equal Protection Clause of the Fourteenth Amendment.

3 205. Plaintiffs Doe and Roe have suffered mental anguish due to Defendants'
4 unlawful actions and seek to recover damages.

5 206. All Plaintiffs seek a declaration that Defendants' actions violate the First
6 Amendment and injunctive relief prohibiting future acts. Without such declaratory
7 and injunctive relief, Defendants will continue to be irreparably harmed.

8
9 **TENTH CAUSE OF ACTION**
10 **Violation of Art. I, § 2 – Constitution of California**

11 207. Paragraphs 1- 206 are incorporated by reference as if fully set out
12 herein.

13 208. The California Constitution provides that “[e]very person may freely
14 speak, write and publish his or her sentiments on all subjects, being responsible for
15 the abuse of this right. A law may not restrain or abridge liberty of speech or press.”

16 209. Defendants' actions, as set forth herein, violate Plaintiffs' speech rights
17 as set forth in Article I, Section 2 of the California Constitution.

18 210. Plaintiffs Doe and Roe have suffered mental anguish due to Defendants'
19 unlawful actions as described herein and seek to recover damages for the same.

20 211. Plaintiffs seek a declaration that Defendants' actions abridge Plaintiffs'
21 rights under the California Constitution and injunctive relief prohibiting future acts.
22 Without such declaratory and injunctive relief, Defendants will continue to be
23 irreparably harmed.

24 **ELEVENTH CAUSE OF ACTION**
25 **Violation of Art. I, § 4 – California Constitution**

26 212. Plaintiffs incorporate paragraphs 1-211 herein by reference.

27 213. The California Constitution provides that “[f]ree exercise and enjoyment
28 of religion without discrimination or preference are guaranteed. This liberty of

1 conscience does not excuse acts that are licentious or inconsistent with the peace or
2 safety of the State. The Legislature shall make no law respecting an establishment of
3 religion.”

4 214. Defendant’s actions, as set forth herein, violate Plaintiffs’ religious rights
5 as set forth in Article I, Section 4 of the California Constitution.

6 215. Plaintiffs Doe and Roe have suffered mental anguish due to Defendants’
7 unlawful actions as described herein and seek to recover damages for the same.

8 216. Plaintiffs seek a declaration that Defendants’ actions abridge Plaintiffs’
9 rights under the California Constitution and injunctive relief prohibiting future acts.
10 Without such declaratory and injunctive relief, Defendants will continue to be
11 irreparably harmed.

12 **TWELFTH CAUSE OF ACTION**
13 **California Education Code section 200 *et seq.***
14 **(brought by Doe and Roe only)**

15 217. Plaintiffs incorporate Paragraphs 1 - 216 by reference as if fully stated
16 herein.

17 218. California Educational Code § 200 *et seq.* provides for a private right of
18 action for intentional discrimination on the basis of religion.

19 219. A plaintiff may maintain an action for monetary damages against a
20 school district when alleging severe, pervasive, and offensive harassment that
21 effectively deprives the student of the right of equal access to educational benefits
22 and opportunities.

23 220. The District and its officials, including Defendants, had actual
24 knowledge of the harassment and responded with deliberate indifference. *Donovan*
25 *v. Poway Unified Sch. Dist.*, 167 Cal. App.4th 567, 603-09 (2008).

26 221. Students and faculty bullied and harassed Doe and Roe and Pioneer FCA
27 students by yelling at them, disparaging their religious beliefs, and harassing the
28

1 Pioneer FCA students before, during, and after their meetings. This bullying and
2 harassment caused severe mental anguish to Doe and Roe.

3 222. The District had control over the students and faculty harassing Doe and
4 Roe, as well as of the campus of Pioneer High School, where the harassment
5 occurred. The District and Defendants had authority and a duty to take corrective
6 action to end the discrimination and harassment but failed to do so and ignored (and
7 even facilitated) many instances of student-on-student harassment.

8 223. The District's deliberate indifference to its students' and faculty's
9 harassment of Doe and Roe deprived them of equal access to educational benefits
10 and opportunities.

11 **THIRTEENTH CAUSE OF ACTION**
12 **Negligence**
13 **(brought by Doe and Roe only)**

14 224. Paragraphs 1 - 223 are incorporated by reference as if fully stated herein.

15 225. Under the California Tort Claims Act, the District is vicariously liable
16 for injuries proximately caused by negligence of school personnel responsible for
17 student supervision. Cal. Gov. Code § 815.2 (a).

18 226. Defendants had a duty to supervise students on the premises of Pioneer
19 High School. Cal. Ed. Code § 44807. The standard of care imposed upon school
20 personnel in carrying out the duty to supervise students is identical to that required in
21 the performance of their other duties, i.e., that degree of care which a person of
22 ordinary prudence, charged with comparable duties, would exercise under the same
23 circumstances; either a total lack of supervision or ineffective supervision may
24 constitute a lack of ordinary care on the part of those responsible for student
25 supervision. *Hoff v. Vacaville Unified School Dist.*, 19 Cal.4th 925 (1998).

26 227. The breach of duty by District officials to supervise the students who
27 have harassed Pioneer FCA students caused Roe and Doe severe mental anguish.
28

1 228. As a proximate result of Defendants' negligent acts, Plaintiffs have
2 incurred damages as alleged heretofore.

3 **FOURTEENTH CAUSE OF ACTION**
4 **Intentional Infliction of Emotional Distress**
5 **(brought by Doe and Roe Only)**

6 229. Plaintiffs incorporate Paragraphs 1-228 by reference as if fully stated
7 herein.

8 230. The actions of Defendants as alleged herein were outrageous, malicious,
9 and intended to inflict emotional distress and humiliation on Roe and Doe.

10 231. As a proximate result of Defendants' intentional acts and failures to act,
11 Plaintiffs have suffered mental anguish and other damages as alleged herein.

12
13 **DEMAND FOR JURY TRIAL**

14 Plaintiffs demand that the Court set this matter for trial before a jury of their
15 peers.

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2 **PRAYER FOR RELIEF**

3 Wherefore, Plaintiffs request that the Court:

4 a. Set this matter on its docket and schedule it for trial in front of a jury of
5 Plaintiffs' peers;

6 b. Declare that the Equal Access Act, First and Fourteenth Amendments to
7 the United States Constitution, and California Constitution require Defendants to
8 cease withholding club recognition and all its attendant benefits due to Plaintiffs'
9 religious beliefs, including but not limited to religious leadership requirements;

10 c. Issue a preliminary injunction during the trial prohibiting Defendants
11 from denying Plaintiffs recognition as a recognized student group because of
12 Plaintiffs' religious beliefs, including but not limited to religious leadership
13 requirements, and enjoining Defendants from allowing students and faculty to harass
14 students in the Student FCA Chapters because of their religious beliefs and/or the
15 FCA students' exercise of their federal statutory or constitutional right to meet to
16 express those religious beliefs;

17 d. Issue a permanent injunction prohibiting Defendants from denying
18 Plaintiffs recognition as a recognized student group because of Plaintiffs' religious
19 beliefs, including but not limited to religious leadership requirements, and enjoining
20 Defendants from allowing students and faculty to harass students in the Student FCA
21 Chapters because of their religious beliefs and/or the FCA students' exercise of their
22 federal statutory or constitutional right to meet to express those religious beliefs;

23 e. Award Plaintiffs such compensatory, punitive, and nominal damages to
24 which they are entitled for the infringement of their rights under federal and
25 California law,

26 f. Award Plaintiffs the costs of this action and reasonable attorney's fees;
27 and
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1 g. Award all such other relief to which Plaintiffs are entitled in law or in
2 equity.

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Respectfully Submitted,

Dated: April 22, 2020

CENTER FOR LAW & RELIGIOUS
FREEDOM

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Jane Doe, Jessica Roe, and Fellowship of
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EXHIBIT A

Name of Club	Advisor	President/Treasurer	Purpose of Club	Meeting Day/Time
Almaden Homework Club	Renduchintala		Help elementary students after school	Wed S-Period Almaden Elementary
Art Club	Tobin		Celebrate Creativity and art	Wed Lunch Rm: 152
Bachelor Nation	Hernandez		Discuss Bachelor	Tues. Lunch Rm: PAC
Baking Society	Cozzella		raise money for charity	Tues Lunch Rm: 451
BC2M	Koring		Raise Awareness on Mental Health	Fri Lunch Rm: P-3
Best Buddies	Lord		Build friendships with those with disabilities	Tues. Lunch Rm: 400B
Black and Blue Crew	Mayhew		Amp up Crowd @ sport events	Fridays 7:00pm Football Field
Book Club	Cozzella		Spread Joy of reading	Thurs: Lunch Rm: 451
BSU	Dampier		Bring black students together	Tues Lunch Rm: R-7
Business is Booming	Koring			Wed. S-Period P-3
Castillero Math Tutoring	Quint		Help Castillero with tutors	Mon Lunch Rm: P-5
Chess Club	Quint		Teach Students Chess	Mon. Lunch P-5
Communism Club	Hoang		Discuss Ideas of Communism	Fri Lunch Rm: R-9
CSF	Gatcke		Provide recognition for great students	Thurs Lunch Rm: Library
Cycling Club	Murdock		meet up with other cyclists	Thurs. Lunch Rm: 309
Dream Club	Koring		Discuss dreams and psychological theories	Mon Lunch Rm: P-3
Dungeons and Dragons	Ratermann		Play DND	Mon Lunch Rm: 352
Estatic Club	Mayhew		Learn new dance skills	Fri Lunch Rm: PAC
Flora and Fauna	Murdock		Spread awareness on Environmental issues	Fri Lunch Rm: 309
Folklorico	De Leon		Share traditional dance with the school	Thurs Lunch Rm: R-3
Frisbee Club	Zaccheo, R.		Play Frisbee	Tues. Lunch Rm: 301
Geometry Club	Pearl		Expand STEM Culture	Wed/Thurs Flex Rm: 204
Gifts for Teens	Bacon		Collect Items for Homeless	Tues Lunch Rm: PAC
Girls Learn Club	Renduchintala		increase awareness on gender discrimination	Tues. Lunch
Girls Who Code	King		Close gender gap in Tech	Wed Lunch Rm: 500
Green Team	Murdock		Help Clean up the Environment	Wed S-Period Rm: 309
GSA	Sulc/McConnell		LGBTQ+ provide a safe place	Thurs. Lunch Rm: 353
Harry Potter Club	Glasser		Discuss Harry Potter	Tues: Lunch Rm: P-1
Integratoin Club	Moaven		Assist in Calculus	Tues. Lunch Rm: R-5
Interact Club	Davis		International organization service club	
K-Pop Club	Boyd		Discuss Korean Culture	Mon Lunch Rm: 305
Key Club	Davis		Give back to community through service	Tues Lunch Rm: 200
Latinx Club	De Leon		Share Cultural Activities	Wed Lunch Rm: R-3
Make A Difference Club	Bowman		Spread Awareness of World Problems	Wed Lunch Rm: R-12
Med Ed Club	Boyd		Background Knowledge of medical school	Wed Lunch Rm: 305
Mermaids Club	Bald		Dance and explore self-expression	TBD
Mock Trial	McConnell		Mock Trial	M/Th/F After school Rm: 453

Multicultural Club	Bald		Learn about different Cultures	Fri Lunch 203
Mustangs Handball	Krail		Play Handball	Mon. Lunch Rm: 307
Newspaper Club	Goldman-Hall		Pioneer Newspaper	Wed S-Period Rm: P-6
Noteworthy Notes	McDonough		express musical interest	Fri Lunch Rm: 101/107
Pacific Islander Club	Quint		Discuss Pacific Islander Culture	Wed Lunch Rm: P-5
Persian Club	Rodriguez		Talk about Persian Culture	Wed Lunch Rm: 357
PHS Ski and Ride	Cozzella		Go skiing and Snowboarding	Monday Lunch R,: 451
Ping Pong Club	Tony Lien		Play Ping Pong	Varies Gym
Pioneers for Christ	Boyd		Support one another learning about Christ	Tues Lunch Rm:305
Political Debate Club	Stallions		Educate students about politics	Tues; Lunch Rm: 304
Politics Club	Day		Talk about politics	Tues. Lunch Rm: 359
Positive Balance	Hernandez/		Anti-Stress/ safe space for students	Tues Lunch Rm: R-7
Pre-Med Society	Boyd		Bring students who are interested in the medical field	Everyother Fri: Lunch Rm: 305
Radio Club	Day		Allow students with own Radio show	Wed. Lunch Rm: TBD
Robotics	King		Expand opportunity for STEM	Multi days and times
Save our Seas	McDonough		Fundraise for 4Ocean	Fri. Lunch Rm: 101
Science olympiad	Murdock		Passion about STEAM	Thurs Lunch Rm: 309
Shrek Club	Bowman		Talk about Shrek and Dreamworks	Friday Lunch Rm: R-12
Simply Cards	Esquerra		Play Cards	M/W/F Lunch Rm: R-6
Smash Club	Zaccheo, R.		Play Super Smash Brothers	Wed. S-Period Rm: 301
Spikeball Club	Esquerra		Play Spikeball	Thurs: Afterschool Rm: R-6
Sports Medicine Club	Vasquez		Students Interested in Sports Medicine	Wed. Lunch Rm: 304
Student Action Committee	Glasser		Encourage activism in a positive way	Wed. Lunch P-1
Tech Deck Club	Hernandez		Have fun with tech decks	Tues After School Rm: 203
Tetris Club	King		play tetris	Mon. After School Rm: 500
The Satanic Temple Club	Bowman		Promote religious pluralism	Wed. Lunch Rm: R-12
UNICEF	Murdock		Fundraise for Children	Mon Lunch Rm: 309
Voices of Music	Levy		Spread Joy through Music	Wed: Lunch Rm:107

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2050	Our goal is to spread awareness and educate on the environmental crisis as well as discuss ways in which we can help guide our planet back to balance. We will also raise money to donate towards the Environmental Defense Fund which will help further take action to help restore our planet.	2050leland@gmail.com	P. Stoltz	Tuesday	Lunch	Twice a month	H10	
4K Dance	4K Dance is a club that focuses on K-POP dance covers. We perform at our own concerts which occur twice a year and at many other event inside and out of school.	4kdanceleland3@gmail.com	T. Blandino	Wednesday	After School	Weekly	FDR	@4kdance.leland
Acts of Random Kindness	We aim to unify Leland students and staff through random acts of kindness. During club meetings, we create arts and crafts activities that we'll pass out to relive student stress and brighten peoples' day!	lelandarkclub@gmail.com	J. Moura	Monday	Lunch	Weekly	K-7	IG: @lelandarkclub
ADAPT	ADAPT, or Advocates for Disabled Adolescents through Projects and Toys, is a club dedicated to raising awareness about genetic diseases and collecting donations for the Saratoga Pediatric Subacute Hospital. Meeting every other Thursday in Mrs. Sarkar's room, we will learn about the different types of complications that occur from different genetic diseases, plan the next outing to the Subacute Hospital (where we connect and play with patients), and help introduce new volunteers to the hospital.	adapt lhs@gmail.com	A. Sarkar	Thursday	Lunch	Twice a month	F-6	IG: @adapt.leland
AI Club	We teach complicated applications of AI technology through interactive means. We include practical applications and attend conferences	lelandai1920@googlegroups.com	L. Berti	Wednesday	Lunch	Twice a month	Media Center	
Amnesty International Club	Leland Amnesty International Club is a chapter of the non-profit organization that works towards achieving human rights for everyone. We write letters and sign petitions in order to help those whose human rights are violated. Some are addressed to government officials, while others are written directly for the victims and their families.	lelandamnestyinternational@gmail.com	E. Ngo	Friday	Lunch	Weekly	H2	Instagram: @lelandamnestyinternational
Anime Club	Anime Club is a club that provides exposure to Japanese culture. Our goal is to help spread appreciation towards the culture by endorsing its trends and entertainment. In doing so, we hope to unite our community on a common interest in Japanese cultural enrichment.	lelandanimeclub@gmail.com	S. Paulazzo	Friday	Lunch	Weekly	K-8	fb: Leland Anime Club
Art Club	This club is a place for anyone who enjoys art to meet and interact with other art enthusiasts! Each club meeting, we have fun art related activities and more planned out!	lhsartclub1920@gmail.com	S. Rapoport	Wednesday	Lunch	Weekly	J-7	IG: @lelandartclub
Aviation Club	Aviation Club connects students with a passion for aviation together once a week in K-6. Our purpose is to share information about aviation history and careers, along with teaching about basics of aerodynamics and other aviation fundamentals.		D Hilger	Tuesday	Lunch	Weekly	k-6	IG: aviationclub_leland
Bare Necessities	We collect menstrual hygiene products (pads and tampons) and gently used bras to donate to homeless shelters in our community and/or victims of natural disasters (like Hurricane Dorian). There is a constant need for menstrual hygiene products as well as bras for the less fortunate. Homeless/ in need menstruators shouldn't have to choose between dinner or a tampon and bras shouldn't be a luxury.	bare necessitiesclub1920@gmail.com	E. Ngo	Wednesday	Lunch	Weekly	H2	IG: lhs.bare necessities
Bioinformatics Club	Bioinformatics club explores the bridge between biology and computer science. We empower students with biochemistry and data science, preparing them for thinkers of tomorrow.	lelandbioinfo@gmail.com	D. Hall	Thursday	Lunch	Weekly	F5	
Black Student Union (BSU)	Black Student Union fosters an environment that allows students of color to feel comfortable sharing their experiences at Leland and discussing current events regarding people of color around the world. BSU aims to build awareness to the reality of being a person of color in today's society, as well as to teach the ideas of tolerance and acceptance to its members.	lelandbsu@gmail.com	Nya Roberts	Friday	Lunch	Twice a month	Media Center	
Bridge Club	Students will learn how to play bridge - a card game that promotes excellence in math, logic, memory, and teamwork. Warren Buffett once said: "Bridge is such a sensational game that I wouldn't mind being in jail if I had three cellmates who were decent players." No materials or prior knowledge needed.	lelandbridgecard@gmail.com	R. Jankowski	Wednesday	Lunch	Weekly	H-4	Facebook: Leland Bridge Card Club
Calligraphy Club	Calligraphy Club aims to share a love of lettering and calligraphy with the community. Members learn lettering and calligraphy in lessons during club meetings and participate in projects to create cards for hospitalized children and overseas U.S. soldiers.	lelandcalligraphy@gmail.com	S. Paulazzo	Monday	Lunch	Twice a month	K-8	

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CAN Club	Our mission is to bring awareness to the Leland High School community about the need for food banks in our area, as well as assist Second Harvest Food Bank through volunteering and food drives at Leland.	lelandcanclub@gmail.com	H. Pimentel	Thursday	Lunch	Twice a month	G-1	IG: @llhs_canclub
Card Games Club	Card Games Club not only incorporates a fun atmosphere in which members can express their interests through their own choice of card games but also diversifies their knowledge of card games through learning new card games. We welcome all people to join because we can teach them new and entertaining card games that will certainly help them relieve their stress.	lelandcardgamesclub@gmail.com	W. Yen	Tuesday	Lunch	Weekly	J-4	IG: @lhs_card_games_club,
Charger Pals	In Charger Pals, club members will create crafts with special needs students at Leland. The main focus of our club is to encourage interaction and build relationships with the special needs students. Through making crafts, playing games, eating food, and more, students are able to feel included in a friendly and encouraging environment.	chargerpalsleland@gmail.com	T. Hart	Wednesday	Lunch	Weekly	K-12	
Chargers for the Cure	Our club works to better community health by informing residents of San Jose about healthy living, through monthly newsletters that discuss health issues like vaping and preventative measures, organizing projects like a low-cost vaccination event, and conducting blood sugar screenings at senior centers.	chargersforthecure@gmail.com	J. Paulsen	Friday	Lunch	Twice a month	F-5	https://www.facebook.com/groups/383504415519062/
Chess Club	Chess Club provides the needed materials to help people interested in chess become better. We hosts tournaments and provide lessons within the club.		J. Sloneker	Wednesday, Thursday	Lunch	Weekly	E-6	website: https://lelandchessclub/ , Instagram: https://www.instagram.com/lelandchessclub/ website: https://www.chess.com/club/leland-chess-club
Cinema Club	Cinema Club is a club where students can explore and discuss various pieces of American film. At meetings members discuss their favorite movies, directors, actors/actresses, and more while also getting the opportunity to watch them with their fellow peers.	lelandcinemaclub@gmail.com	P. Stoltz	Tuesday, Thursday	Lunch	Weekly	H-10	IG: lhs_cinema.club
Code-matics Club	We bridge the gap between mathematics and computer science - in order to code, you need to know a bit of discrete math + number theory. We meet bi-monthly, and we lectures on topics regarding number theory and discrete math. Besides these wonderful lectures, we aim to bring guest mathematician speakers, prepare students for the USA Mathematical Talent Search (USAMTS) competition, and add an interdisciplinary aspect to our lectures - for example: making relations with biology, chemistry, and physics.	lelandcodematics@gmail.com	H. Pimentel	Wednesday	Lunch	Twice a month	G-1	Instagram: @code matics
Codementary	Our club will be designed to bring together passionate coders from around the school and progress our knowledge together. Once we have established the core fundamentals of computer science, we plan to continue our ongoing program where we teach 3rd-6th graders the basics of coding at local San Jose library branches through interactive, exciting game-developing workshops. This experience is aimed to heighten each high school individual's knowledge in computer science and encourage them to adapt to exciting, fresh environments.	lelandcodementary@gmail.com	R. Wallace	Tuesday	Lunch	Weekly	E8	Website: codementary.org , IG: @leland.codementary
Creation Club	Basically, we make things. We do unconventional art, including digital art, animation, and 3D. Club members also have the choice to use materials for traditional art to create unconventional art, such as abstract paintings and sculptures. There are a multitude of things that club members can do, including working in groups to create something. The whole club will participate in at least 1 big project per school year for the art show held once per semester, or if needed only once per school year.		A. Rutsch	Monday, Friday	Lunch	Weekly	J-11	
CSF	CSF is a club that provides community service opportunities to students who have outstanding grades. Members who earn 60 hours over 4 years receive a scholarship and sash to wear at graduation!	csf.leland@gmail.com	S Seandel	Tuesday	Lunch	Twice a month	H9	
Economics Club	Economics Club is an interest group at Leland dedicated to discussing economic topics, analyzing current market trends, and exploring careers in finance. We also have an ongoing stocks game to practice investing skills. We meet monthly on Mondays in K-1.	lelandeconomicsclub@gmail.com	R. Miller	Monday	Lunch	Monthly	K-1	Facebook: Leland Economics Club
Entourage	Have you ever seen the student section at the football games? Ever wonder where all the hype comes from during basketball season? That's Entourage in a nutshell. Eat. Sleep. Charge on.		M. Walsh	Friday	After Scho	Monthly	GBA	IG: lelandentourage2020

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FBLA	FBLA is the high school division of Future Business Leaders of America-Phi Beta Lambda, Inc. FBLA helps high school students prepare for careers in business through academic competitions (FBLA Competitive Events), leadership development, and educational programs.	lelandfbla1@gmail.com	T. Hall	Friday	Lunch	Weekly	C10	Website: https://lhsfbla.weebly.com , IG: @leland.fbla, Facebook Page: Leland FBLA, Facebook Group: Leland FBLA
Fellowship of Christian Athletes (FCA)	Our vision is to see the world transformed by Jesus Christ through the influence of coaches and athletes. We aim to lead new believers into a growing relationship with Jesus Christ and His church. Our relationships will demonstrate steadfast commitment to Jesus Christ and His Word through integrity, serving, teamwork and excellence.	lelandfca@gmail.com	G. Clarke	Thursday	Lunch	Monthly	E-1	IG: @lelandfca, Website: https://fca.org/aboutus/who-we-are/vision-mission
Finance Club	Looking at economics from both a global view and personal view, Finance Club aims to educate interested people in the means of both personal finance and global economics.		Robert Miller	Tuesday	Lunch	Twice a month	K-1	
French Club	French Club aims to expose Leland students to French language and culture and to emphasize multiculturalism in daily life. Participating in this club includes exploring French cuisine, music, and culture, and opportunities to attend lectures and classes to better understand the language. No prior French knowledge is necessary. All are welcome!	frenchclubleland@gmail.com	M. McNabb	Friday	Lunch	Twice a month	F1, Madame M	Instagram: @lelandfrenchclub,
Game Club	In Game Club, students have a great chance to meet new people, relax, and play games with each other. Computer games, board games, phone games, and card games are all an option at Game Club. Feel free to bring in any game you want to play with others!	lelandgameclub@gmail.com	P. Stoltz	Wednesday	Lunch	Twice a month	H-10	Facebook: Leland Game Club
Game Design and Programming Club	Game Design and Programming club is a club dedicated to game development. Our mission is to teach not just coding behind game design but also programming in general as well. We will also teach other crucial aspects of game design such as music creation, CADing, and sprite creation. By the end of the year, you should be able to create your very own game!	lelandgamedesignclub@gmail.com	R Wallace	Wednesday	Lunch	Twice a month	E-8	
Games Club of Leland	All-inclusive club for games of all kinds. Video games, board games, etc.	lelandgamesclub@gmail.com	T. Hart	Friday	Lunch	Weekly	class K-3	IG: @gamesclubofleland
Gaming To Give	We hold gaming tournaments to raise money for local organizations and non-profits. We play some of the most popular games and encourage even the most casual of gamers or non gamers to contribute and have fun!	gamingtogivecorp@gmail.com	W. Yen	Wednesday	Lunch	Twice a month	J4	gamingtogive.org, IG: @gamingtogive
Girls Who Code	Girls who code close the gender gap in the Engineering field. In our club we help our members create cool projects through lessons that occur during lunch. We also go to hackathons as well as field trips(not as often).	lelandgirlwhocode@gmail.com	K Thoman	Monday	Lunch	Twice a month	C-9	@lhsgirlwhocode
Glee Club	A club where people come together to play music and sing. Performances about twice a semester and a very fun experience which benefits the community and the students involved.	lhsglee@gmail.com	R. Ajlouny	Tuesday	Lunch	Weekly	G-2	Instagram: @lelandgleeclub
GSA	GSA (Gender Sexuality Alliance/Gay Straight Alliance) is a club where students of the community or allies come together and discuss about LGBTQ+ history, important figures, and personal/social issues	lelandgsaclub@gmail.com	C. Barros	Tuesday	Lunch	Weekly	E-3	
Handcrafted Club	In Handcrafted club, we will be making fun crafts and DIY's every other Thursday during lunch. Our club's goal is to mainly reuse waste such as plastic water bottles by using these as materials for our crafts. This way we can create art, and help save the planet at the same time.	handcraftedclub@gmail.com	N. Hamilton	Thursday	Lunch	Twice a month	J-8	IG: @lhsandcraftedclub,
Helping Hands	We help raise money for orphanages in impoverished regions of Iran. Iranian orphanages receive very little funding from the government, so we will use the money to buy clothes for the orphanages.	lhshelpinghands@gmail.com	T. Blandino	Friday	Lunch	Weekly	K-11	IG: @lhshelpinghands
Hockey club	Hockey club is an interactive team and social group, where anyone of any skill or interest is welcome. Even if you don't play hockey and are just interested, come to our meetings where we will talk all things hockey.	hockeyclublhs@gmail.com	S. Paulazzo	Tuesday	Lunch	Monthly	K-8	
Indian Heritage Club	Our club strives to promote Indian Culture and teach our members the important aspects of it. This is done by holding club meetings, running fun activities for our members, and inviting guest speakers to come and share their knowledge of Indian Culture.	lhsindianheritageclub@gmail.com	P. Stoltz	Friday	Lunch	Twice a month	Mr. Stoltz's room	IG: @indianheritageclub
International Club	We at International Club want to expose the Leland Community to different cultures from around the world the world. At club meetings, we learn about new cultures by watching foreign films and enjoying free snacks.	lelandinternational10@gmail.com	J Topalovic	Tuesday	Lunch	Weekly	C-6	Leland International Club (facebook)

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JAW (Journey Around The World)	JAW is a non-profit club at Leland High School. Each year, we choose a new country to fundraise and provide helpful resources for. In the past and this year, we are donating money to Doris Dillon School in Cambodia, a non-profit school for underprivileged students in Cambodia.	jawnonprofit@gmail.com	T. Blandino	Tuesday	Lunch	Twice a month	K-11	Instagram: @lelandjaw, Website: http://jawnonprofit.wixsite.com/jawnonprofit
Key Club	Key Club is an international student-led organization which provides its members with opportunities to provide service, build character, and develop leadership skills. We have been serving our community since 1967 and is one of the many high schools in a division, also known as Division 12 South, in the California-Nevada-Hawaii district. Key Club provides funds for the Pediatric Trauma Program and strives to eliminate Maternal Neonatal Tetanus.	lelandkc@gmail.com	Annie Larks	Wednesday	Lunch	Weekly	GBA	Website: http://lelandkey.weebly.com/ , IG: @lelandkeyclub, FB: @Leland Key Club, Flickr: @lelandkeyclub,
Lacrosse Club	Lacrosse Club is meant to help prepare incoming and returning lacrosse players for the season in the spring. We hope to boost awareness of the sport at Leland and to expose new players to the sport through field time with experienced players.	lelandlacclub@gmail.com	A Rutsch	Thursday	Lunch	Twice a month	J-11	
Ladki Love	Our mission is to help kids in rural parts of India get a proper education. We sell accessories to raise money so we can donate it to an organization in India.			Thursday	Lunch	Twice a month	H-9	Website: http://www.ladkilove.org/ IG: @ladkilove Facebook: Ladki Love
Leland American Red Cross	Leland American Red Cross is a club that focuses on disaster preparedness and community safety. Throughout the year, we have many volunteer opportunities such as volunteering at blood drives. This year, our goal is to be able to teach safety and preparedness at local facilities, expanding our knowledge onto our community.	lelandamericanredcross@gmail.com	J. Kerwin	Tuesday	Lunch	Weekly	k-10	instagram: lelandamericanredcross facebook: Leland American Red Cross 2019-2020
Leland Bring Change to Mind (BC2M)	The Leland Bring Change to Mind club is dedicated to ending stigma surrounding mental health. We accomplish this by educating club members about various mental illnesses and providing a safe network. Highlights over the past few years include bringing therapy dogs to campus during finals week and wellness week with self-care centered tutorial periods.		S. Peters	Friday	Lunch	Twice a month	GBA	Instagram: @lelandbc2m. Facebook: Leland Bring Change to Mind Club
Leland Girl Up	We work towards providing funding for girls' education in third world countries like India, Guatemala, and Ethiopia. We spread awareness about the forced child marriages, sexual harassment, and lack of citizenship these girls face to Leland's community.		J. Touchton	Monday	Lunch	Montly	H-8	@lelandgirlup
Leland Junior State of America	Junior State of America (JSA) is the largest student led organization in the US. Our goal is to give a place for students to discuss politics with people of varied opinions, give students the tools to differentiate real news from fake news, and to teach students the importance of fulfilling one's civic duty. We do this by hosting debates regularly, going to JSA conventions where students can network with students and legislators from across the country, and finding opportunities for students to directly impact politics such as internships or becoming part of a political campaign.	lelandjuniorstate@gmail.com	T. Connors	Friday	Lunch	Twice a month	K4	https://www.facebook.com/Leland-Junior-State-of-America-113484496699464/
Leland Medical Club	We're a club that aims to inspire students to pursue a career in medicine through activities such as lectures from physicians and dissections.	lelandmedicalclub@gmail.com	M. Cahn	Wednesday	Lunch	Twice a month	F-7	FB: Leland Medical Club IG: @lhsmedicalclub
Leland Naach	Naach is Leland's premier Bollywood/Hip-Hop Dance Team. Our school team performs at rallies, school events, and the talent show. Our competitive team also performs at several school events, as well as auditions and shows at different high schools all across the bay.	lelandhsnaach@gmail.com	J. Oddson	Monday	After Scho	Weekly	E-wing hallway	IG: @lelandnaach
Leland Oceanic Preservation Club	We are an interest group dedicated to educating students about the various issues surrounding the world's oceans, including: the effects that ocean contamination has on both humans and the ecosystem, international political issues revolving around the state of the oceans, and various steps that can be taken to preserve the ocean and prevent further contamination.	lhsocanpreservation@gmail.com	L. Walton	Thursday	Lunch	Twice a month	F-3	Instagram: @lhs_ocean_preservation,
Leland Robotics 604	Team 604 has been a member of the FIRST Robotics Competition since 2001. We have made it to championships every year since 2012, and even won our division in 2017. Not only do we compete, we also teach local kids STEM through Lego robotics and science experiments. There are no prerequisites to joining our team; just the desire to learn.	lelandrobotics@gmail.com	H. Arrington	Monday	Lunch	Weekly	GBA	website: 604robotics.com facebook: @frc604 instagram: frc604

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Leland Science Club	We are a club with the aim to increase a passion of science in our community through science fairs, science bowl, and olympiads such as the USABO and the Science Bowl. We are also holding a Leland Science Fair for elementary, middle and high school students to give exposure to research methods and/or to prepare for the Synopsys Science Fair. Members and volunteers can get community service and show leadership!!	lelandsciclub@gmail.com	J. Lutze	Wednesday	Lunch	Weekly	C-1	Facebook: https://www.facebook.com/groups/233915833944419/
Leland STEM Club	Leland STEM aims to inspire young kids to pursue STEM by exposing them to a number of basic concepts through interactive experiments. Our topics range from chemistry and physics to innovative engineering challenges all hosted by Leland students. High School volunteers will receive community service hours and be a part of exciting club activities throughout the year. We will also be inviting guest speakers from Bay Area companies over the year.	lelandstem@gmail.com	K. Thoman	Friday	Lunch	Twice a month	Ms. Kat's room	IG: @lelandstem, FB: Leland STEM Club
Leland Women	Leland Women is a club that works towards empowering the women on the Leland campus and overall providing a safe space to discuss topics surrounding feminism, beauty standards, intersectionality, etc. We hope to create a tight knit community of empowered women on campus and give them the support and love they deserve.	lelandwomen@gmail.com	B. Marchetti	Wednesday	Lunch	Twice a month	K-5	IG: @lelandwomen,
Linguistics Club	Linguistics Club aims to bring information and connect Leland students to resources and information in the field of linguistics. Our goal is to create a community of Leland students interested in linguistics, or other fields that connect to linguistics. Club meetings generally consist of lectures, interactive activities, or guest speakers.	lelandlinguisticsclub@gmail.com	J. Touchton	Friday	Lunch	Weekly	H-8	
LiNK (Liberty in North Korea)	Fundraising to secure safe passage for North Korean refugees and raising awareness about the plight of North Koreans.	linkatleland@gmail.com	J. Lutze	Friday	Lunch	Twice a month	C1	IG: linkatleland
Machine Learning and Hackathon Club	Our club teaches introductory python to and basic machine learning algorithms. We want to focus on applying programming knowledge to solve real world problems.	lelandmachinelearning@gmail.com	T. Blandino	Tuesday	Lunch	Twice a month	K11	
Make A Wish	Make A Wish club is dedicated to spreading cancer awareness and raising money for the Make A Wish Foundation! Every meeting we talk about different types of cancers. We have fundraisers and fun events, all the while helping children in hospitals all around the Bay Area.	makeawishleland@gmail.com	J. Oddson	Tuesday	Lunch	Twice a month	E-4	IG: @makeawishleland
Math Club	If you want to learn mathematics outside of classroom, this is the club for you. You get to participate in extracurricular math competitions and join a group of people who all enjoy math.		J. Montgomery	Friday	After School	Weekly	C-3	
Meditation and Stress-Reduction Club	Feeling stressed? Overwhelmed? Join the Meditation Club! Here we give you techniques on how to reduce stress in all aspects of life: social, academic, and so much more!		J.Paulsen	Thursday	Lunch	Montly	F-5	
Model United Nations	A club for students of all ages to learn more about the world and the way it works through conferences that model the real-world United Nations. There are two this year, information is given every weekly meeting, the first one in the beginning of December and the second at the end of January.	lelandhsmun@gmail.com	G. Brasher	Monday	Lunch	Weekly	H-7A	https://sites.google.com/view/lelandhsmun/home
Music Club	Music Club allows students to play music in a comfortable and stress-free environment, collaborate with their peers as chamber musicians, and add on to their knowledge of music. Through the many service opportunities provided by this club, students are able to benefit the community when they perform, receive volunteer hours, and gain performance experience. The club's mission is to make a positive impact on the community—one note at a time!	lelandmusicclub@gmail.com	M. Cahn	Thursday	Lunch	Weekly	F7	instagram: @lelandmusicclub
National Honor Society	National Honor Society is a club that recognizes students who demonstrate the qualities of scholarship, character, leadership, and service. Our club is circumscribed around service and the main objective is for all of our members to bring an effective change to their communities and the world that we live in.	lelandnhs4@gmail.com	J. Cohen	Tuesday	Lunch	Twice a month	K-2	
Origami Club	We learn to fold a new origami model every week during lunch. At events such as the Hakone Matsuri, our club members teach origami to people of all ages. Also, we occasionally decorate the school.	lelandorigami@gmail.com	J. Touchton	Thursday	Lunch	Weekly	Room H-8	
Physics Club	We focus around preparing for the physics competitions, especially the F=ma competition in January. We also discuss physics in general, and help others in their physics classes.	lelandphysics@gmail.com	K. Tibbs	Monday	Lunch	Weekly	F9	

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Podcast Club	Students learn how to record, edit and produce their own podcasts that are uploaded on Anchor for other students to listen to. Students get into groups based on interests (lifestyle, politics, sports, entertainment, arts, etc.) to come up with ideas for episodes of their podcasts. The club produces several types of podcasts catered to different interests.	lhspodcastclub@gmail.com	S. Dawson	Wednesday	Lunch	Montly	J-5	
Psychology and Neuroscience Club	We're an interest group that is targeted at students who want to major in/interested in psychology and/or neuroscience. We plan on exploring current research in the field, participating in events such as the Alzheimer's Walk, discussing student's summer research opportunities, talking about ethics in the field, and more. Drop in to one of our meetings in F-6 on Fridays or talk to Rishab Iyer for more information!	lelandpsychneuroclub@gmail.co	A. Sarkar	Friday	Lunch	Weekly	F6 Sarkar	
Quiz Bowl	We play Quiz Bowl, a Jeopardy-style activity where people buzz in to answer questions about a variety of subjects ranging from history and science to pop culture and current events. We regularly compete in tournaments against other schools both locally and nationally and it's a great way to show any knowledge you have and learn more.	lelandquizbowl@gmail.com	R. Miller	Wednesday	Lunch	Weekly	K1	Facebook: Leland Quiz Bowl
SAT Prep Club	SAT Prep Club provides students with the perfect environment and resources they need to excel at the SAT and standardized testing in general. It levels the playing field between those who can and cannot afford expensive test prep bootcamps.	lelandsatclub@gmail.com	T. Blandino	Friday	Lunch	Twice a month	K11	
Save the Children	A school club of the charity, Save the Children, dedicated to championing the rights and interests of children worldwide. We spread awareness about and take action to change the situations of marginalized youth in the Silicon Valley and in other countries through fundraisers, community service projects, petitioning, and more.	lelandstc@gmail.com	W. Yen	Thursday	Lunch	Twice a month	J-4	IG: @lelandstc
Senior Women	We help ensure a happy environment for the Leland community specifically the seniors and staff. We decorate the campus and provide fun activities for the seniors. We also hold events to help those who are in need throughout our community outside of Leland.		P. Young	Thursday	Lunch	Montly	D-2	IG: lhs_seniorwomen
Students for the Environment	Students committed to making Leland a leading eco-friendly school. We are going to host community service clean ups and start a Leland compost program. We are also going to do small art projects around the school to increase environmental consciousness.		J. Canter	Wednesday	Lunch	Twice a month	K-9	IG: @studentsfortheenvironment
Students Rebuild	We combine art and philanthropy to make a difference within our local community and globally. This year's challenge is the Hunger Challenge so our efforts will be focused towards that.		S. Gillis	Tuesday	Lunch	Montly	E-2	@lelandstudentsrebuild
Table Tennis	This club will help you grow your table tennis skills. We will hold tournaments occasionally in order to add a competitive aspect for those interested. Students can also interact with new faces and bond together to form one community. If table tennis is your passion or interest, then I recommend you join this club!	Lhs.tabletennis19@gmail.com	T. Blandino	Wednesday, T	Lunch, Aft	Twice a month	K-11 and gym	Lhs.table_tennis
The Creative Writing Club	The Creative Writing Club publishes original works of fiction, poetry, art, and music. Every semester, we produce an anthology of student works, as a professionally-bound magazine. Each is carefully designed and curated, and backed by three years of publishing experience. Join today!	chargerscreative@gmail.com	J. Touchton	Tuesday	Lunch	Twice a month	Room H-8	Facebook: The Creative Writing Club, chargerscreative@gmail.com,
Youth Conservative Forum	The Youth Conservative Forum is a club dedicated to promoting diversity of political thought and exposing students to conservative ideas. We host debates and forums, and volunteer at local political events.	youthconservativeforum@gmail.com	J. Moura	Tuesday	Lunch	Twice a month	K-9	Web: youthconservativeforum.org, IG: @youthconservativeforum

Club Name	Advisor
Robotics Club	Dr. Milgram
Ice Hockey	Mr. O
FIDM Club	Ms. Bielefeld
Art Club	Mr. Stachnick
Thespian Club	Ms, Disario
Showcase Club	Ms. Disario
Drama Club	Ms. Disario
Jewish Culture Club	Ms. Miller
Book Club	Mr. McDonald
CSF	Ms. Bielefeld
AVID	Ms. Lee
NHS	Ms. Avery
Tabletop Club	Mr. Miller
French Club	Ms. Foster
Hiking Club	Ms. Banerjee
FCA	Mr. Cooper
Interact	Dr. Spodick
Plus Club	Ms. Disario
True Crime Club	Ms. Delucchi
Doki Doki Literature Club	Dr. Milgram
Anime Club	Ms. Bielefeld
Buddies Club	Mr. Peterson
Clean Wave Club	Mr. Wind
Recycling Club	Mr. Partridge
Frisbee Club	Mr. Stachnick
WGHS Spirit Squad	Mr. Sierra
SAGA	Ms. Lee
Christian Club	Mr. Cooper
Dubs Only	Mr. Marino
Hacky Sack Club	Ms. Bielefeld
Invisible Issues Club	Ms. Bauer
Democratic Socialist of America	Mr. Old
Hack Club	Mr. Old
Black Student Body	Ms. Sariñana
Hiking Club	Mrs. Walker
Film Club	Mr. Andres
Spikeball Club	Mr. Wind
Model United Nations Club	Ms. Banerjee
Club Youth & Government	Ms. Suarez
Latino Club and Dreamers	Ms. Norment
Rambuck's Cafe	Mr. Peterson
Key Club	Ms. Miller
The Environmental Protection Club	Ms. Lee
Fighting Game Club	Mr. Old

EXHIBIT B



FELLOWSHIP OF CHRISTIAN ATHLETES

COACHES' Huddle

HUDDLE
PLAYBOOK

Exhibit B-02



FCA VISION:

TO SEE THE WORLD TRANSFORMED BY JESUS CHRIST
THROUGH THE INFLUENCE OF COACHES AND ATHLETES.



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Dear Teammate,

Thank you for serving in an FCA Huddle leadership role and for taking on the challenge of reaching athletes and coaches for Jesus Christ. You are in an dynamic position to have an eternal impact!

FCA's theme is **LET'S GO**:

Jesus came and told his disciples,

“I have been given all authority in heaven and on earth.
herefore, go and make disciples of all the nations,
baptizing them in the name of the Father and the Holy Spirit.

Teach these new disciples to obey all the commands
I have given you. And be sure of this: I am with you always,
even to the end of the age.”

Matthew 28:18-20

True Competitors encourage each other to greatness. Jesus commands us to move forward with great boldness and go into all the world, make disciples and teach the Good News. For one moment, we can dig deep and push beyond our perceived limits to accomplish more than we can imagine. Together, we can see the world transformed by Jesus Christ.

Let's Go,

The Fellowship of Christian Athletes

Exhibit B-05



FELLOWSHIP OF CHRISTIAN ATHLETES

TEACHING

HUDDLE
PLAYBOOK

Exhibit B-06

COACHES' Huddle



The Myths vs. The Facts of Ministry

The Myths	The Facts
Ministry is about ministry.	Ministry is about the kingdom.
Ministry is telling.	Ministry is serving.
Relationships follow ministry.	Ministry follows relationships.
I need to be successful.	I need to be faithful.
Ministry begins when I show up.	Ministry begins when I leave.

As ambassadors of Jesus Christ, we are positioned as ministers of the Gospel to the world.

FCA History

The Fellowship of Christian Athletes was an idea born in Don McClanen's heart in 1947 when he was a student at what is now Oklahoma State University. He believed that athletes could use their platform of influence to present Jesus Christ to the entire culture in a powerful way. McClanen officially began FCA in 1954. The first FCA Camp was held in 1956 at Estes Park, Colorado with 256 athletes and coaches attending. The huddle ministry began with the formation of FCA Huddles in 1966.

FCA Today

FCA is touching millions of lives...one heart at a time. Since 1954, FCA has been challenging coaches and athletes on the professional, college, high school, junior high, and youth levels to use the powerful medium of athletics to impact the world for Jesus Christ. FCA focuses on serving local communities by equipping, empowering, and encouraging people to make a difference for Christ.

You can find out more about what is currently happening in FCA by checking out FCA.org to get the latest news on what God is doing in FCA across the world.



WHAT IS FCA MINISTRY?

About FCA

OUR VISION

To see the world transformed by Jesus Christ through the influence of coaches and athletes.

OUR MISSION

To lead every coach and athlete into a growing relationship with Jesus Christ and His church.

OUR VALUES

Our relationships will demonstrate steadfast commitment to Jesus Christ and His Word through Integrity, Serving, Teamwork and Excellence.

Integrity - We will demonstrate Christ-like wholeness, privately and publicly. (Proverbs 11:3)

Serving - We will model Jesus' example of serving. (John 13:1-17)

Teamwork - We will express our unity in Christ in all our relationships. (Philippians 2:1-4)

Excellence - We will honor and glorify God in all we do. (Colossians 3:23-24)

OUR STRATEGY - To and Through the Coach

We pursue our vision and mission through the strategy of **to and through the coach**. We seek ministry first to coaches hearts, marriages and families. Then, when ready, we minister **through** coaches to their fellow coaches, teams and athlete leaders. Billy Graham said, "A coach will impact more people in one year than the average person will in an entire lifetime." With the influence of a coach, FCA recognizes the most strategic way to reach more athletes is to first reach the coach.

OUR METHODS

As FCA matures, we seek to make disciples through our methods of engaging, equipping and empowering coaches and athletes to know and grow in Christ and lead others to do the same.

Engage (1 Thessalonians 2:8)

We engage relationally by connecting with individuals and through events in many different environments by building genuine trust, sharing our lives and sharing the gospel. We strive to connect with coaches and athletes where they are on their spiritual journey.

Equip (Ephesians 4:12)

After cultivating relationships and once coaches and athletes come to faith in Christ, we want to equip them with Christ-centered training, events, resources and on-going support in what it means to be a follower of Christ, growing in God's Word and applying it to life.

Empower (2 Timothy 2:2)

Once equipped, we empower faithful leaders who desire to use their time, talents and treasures to help other coaches and athletes experience the gospel, grow in their faith and share Him with others. We desire to develop disciples who make disciples, assisting them so that they can in turn engage, equip and empower others to know and grow in Christ and lead others to do the same.



WHAT IS FCA MINISTRY?

Distinctives

FCA is a ministry that's distinct from other ministries by what we do and how we do it. Our Vision, Mission, Fundamentals, Values, and Statement of Faith provide most of this distinction. However, we've provided a list below of FCA Ministry Distinctives that are a combination of philosophy and strategies that communicate what we're about and what we're working to accomplish.

1. **Christ-Centered...** focus of our message
2. **Kingdom-Minded...** serving the purpose of the church
3. **Church Bible-Based...** source of our authority
4. **Athletically Focused...** ministering to coaches and athletes
5. **Spiritually Nurturing...** helping people to know and grow in Christ
6. **Fellowship-Oriented...** connecting people through the love of Christ
7. **Volunteer-Intensive...** mobilizing adults to accomplish the mission
8. **Culturally Adaptive...** meeting the diverse needs of people
9. **Faith-Financed...** funded through people moved by God to give

Ministry Fundamentals

The Ministry Fundamentals are the core competencies of our ministry and the foundation of all we do as a ministry. FCA's Ministry Fundamentals are Share, Seek, Lead, and Love.

Share Him Boldly (Acts 5:42) – FCA shares Jesus with those who do not have a personal relationship with Him. We believe that Salvation is only found in Jesus, and with great passion we desire to share the Gospel with the world. (Present Gospel)

Seek Him Passionately (Acts 17:11) – FCA equips and encourages others to seek Him daily. A life-long pursuit of knowing and loving Jesus takes perseverance and discipline. (Disciple Others)

Lead Others Faithfully (1 Corinthians 14:12) – FCA desires to model Jesus' example of serving by seeking out the needs of others, developing trusting relationships, and caring about the individuals we serve. (Reach Out)

Love Others Unconditionally (1 Peter 4:11) – FCA realizes that the most powerful force in the world is love. We desire to be obedient to the Lord as He said that we would be known by our love. (Fellowship Together)

Exhibit B-10

Statement of Faith

We believe the Bible to be the only inspired, trustworthy and true, without error, Word of God. (2 Timothy 3:16-17)

We believe there is only one God who eternally exists in three persons: Father, Son and Holy Spirit. (Matthew 28:19)

We believe Jesus Christ is God, in His virgin birth, in His sinless life, in His miracles, in His death that paid for, our sin through His shed blood, in His bodily resurrection, in His ascension/rising up to the right hand of the Father and in His personal return in power and glory. (John 1:1; Matthew 1:18,25; Hebrews 4:15; Hebrews 9:15-22; 1 Corinthians 15:1-8; Acts 1:9-11; Hebrews 9:27-28)

We believe that acceptance of Jesus Christ and the corresponding renewal of the Holy Spirit are the only paths to salvation for lost/sinful men and women. (John 3:16; John 5:24; Titus 3:3-7)

We believe in the present ministry of the Holy Spirit, who lives within and guides Christians so they are enabled to live godly lives. (John 14:15-26; John 16:5-16; Ephesians 1:13-14)

We believe in eternal life, and that through belief in Jesus Christ as the Son of God, we spend eternity with the Lord in Heaven. We believe that in rejecting Jesus Christ as Lord and Savior, we receive eternal suffering in hell. (Matthew 25:31-46; 1 Thessalonians 4:13-18)

We believe in the spiritual unity of believers in our Lord Jesus Christ, that all believers are members of His body, the Church. (Philippians 2:1-4)

We believe God's design for sexual intimacy is to be expressed only within the context of marriage, that God created man and woman to complement and complete each other. God instituted marriage between one man and one woman as the foundation of the family and the basic structure of human society. For this reason, we believe that marriage is exclusively the union of one man and one woman. (Genesis 2:24; Matthew 19:5-6; Mark 10:6-9; Romans 1:26-27; 1 Corinthians 6:9)

We believe that God created all human beings in His image. Therefore, we believe that human life is sacred from conception to its natural end; that we must honor the physical and spiritual needs of all people; and by following Christ's example, we believe that every person should be treated with love, dignity and respect. (Psalm 139:13; Isaiah 49:1; Jeremiah 1:5; Matthew 22:37-39; Romans 12:20-21; Galatians 6:10)



WHAT IS FCA MINISTRY?

Ministry as a Christian Community

FCA is a Christian community that is led by those who serve FCA’s mission as its representatives, including all of FCA’s directors, officers, employees and volunteer leaders, each of whom is an integral part of the community (and are described in this Manual as “FCA Representatives”). Both of FCA’s mission and the association of FCA’s representatives are an exercise and an expression of FCA’s Christian beliefs.

Organizational Structure



Organizational Staff/Geographical Structure

- Local
- State
- Regional
- National
- International

FCA’s ministry growth over the years has produced the need for an effective organizational structure. This structure includes local ministry supported by local staff, which is supported by a regional and national FCA ministry organization. When you are a part of FCA, remember that you are not alone. You are part of a large, organized team developed to support what God has called you to do!

Since 1966, the FCA Ministry has been present on campuses all across the country. The Huddle Ministry is initiated and led by student-athletes and coaches on junior high, high school, and college campuses. The purpose of Huddle Ministry, through various types, has been to share the Gospel of Jesus Christ with the lost and to grow and mature as a follower of Jesus Christ.

The "win" of Huddle Ministry is to see campuses impacted for Jesus Christ through the influence of athletes and coaches.

Why We Do Huddle Ministry

- The mission of reaching out to every person with the Gospel and making disciples everywhere is a direct response to the heart of our Lord Jesus Christ, and brings great glory to God.
- Student-athletes, as implied in the Scriptures, are loved and cared for by our Lord. They are worth our deepest love, our best sacrifice; and in light of the Great Commission and their open hearts, we, the Body of Christ, are compelled to focus on making every effort to reach them with the Gospel.
- The college, high school, and middle school campus is strategic. Huddle Ministry answers the question, "How will FCA effectively impact the campus, club, and travel teams in such a way that Christ is lifted up among the millions of students in our nation?"
- Huddle Ministry provides an unprecedented opportunity to build Christian student-athletes in their faith and equip them as followers of Christ.
- The campus gives FCA the platform to minister to the greater community.
- It is FCA's objective to Engage, Equip and Empower, and encourage student-athletes to impact and influence their campus for Christ.
- FCA is called to glorify God through our unity, committed to a common cause, lifting up one another, sacrificing for the greater good of the Kingdom.



WHAT IS FCA HUDDLE MINISTRY?

Who Leads?

Adult & Student Leaders

Criteria:

1. A commitment to Christ
2. A commitment to Sport
3. A commitment to Huddle
4. A commitment to FCA

To express and exercise FCA's Christian beliefs, all FCA leaders must contribute to FCA's Christian character and mission (see page 38), perform all of their duties as a service to God, and model FCA's Christian beliefs for the larger community. Further, all FCA leaders must affirm their agreement with FCA's Christian beliefs and endeavor to conduct themselves at all times in a manner that affirms the biblical standards of conduct in accordance with FCA's Christian beliefs. Such conduct standards include FCA's Youth Protection Policy and Student Leadership Statement.

Finally, all FCA leaders must be ready, willing and able to lead or contribute to distinctly Christian activities such as worship or prayer services.

See appendix for complete Statement of FCA's Christian Character and Mission.

Student-Athlete Responsibilities:

1. Seek God's direction for the Huddle Ministry through personal prayer and Bible study.
2. Demonstrate leadership and live a consistent Christian life that models Jesus to your peers.
3. Complete Student Leader Application and return it to Huddle Ministry sponsor or staff.
4. Use personal gifts and talents to help plan and implement FCA ministry on your campus, including leading Bible Study Workouts.

Adult (Coaches, Teachers, and Administrators) Responsibilities:

1. Seek God's direction for the Huddle Ministry through personal prayer and Bible study.
2. Demonstrate leadership and live a consistent Christian life that models Jesus to others.
3. Contact the local FCA staff person to certify a Huddle.
4. Complete the Ministry Leader Application online at fca.org/mla.
5. Create a student-athlete leadership team.
6. Assist the leadership team in making decisions and planning meetings, events, and group activities.
7. Meet with the leadership team regularly to discuss and evaluate meetings, events, and group activities.
8. Seek to develop and mature the growth of the leadership team as followers of Jesus Christ.
9. Serve as a liaison between the local FCA adult supporters and Huddle Ministry.
10. Inform Huddle Ministry of FCA activities on the local, state, and national levels.
11. Understand FCA's Youth Protection Policy and ensure that it is strictly enforced.

Ways FCA Staff Can Serve You:

1. Pray for you and your Huddle.
2. Certify your Huddle Ministry.
3. Encourage you through personal contacts and visits.
4. Equip you with ministry resources.
5. Help you develop a Huddle Ministry plan.
6. Inform you of local, regional, and national ministry events and activities.

Huddle Ministry Types

Multi-sport Huddle - A small group Bible study for coaches, athletes and all whom they influence. (Traditional Huddle)

Team Huddle - A team Bible study.



FELLOWSHIP OF CHRISTIAN ATHLETES

TRAINING

**H U D D L E
P L A Y B O O K**

Exhibit B-16

**CO
G
S
T
E**

HOW DO I DO FCA HUDDLE MINISTRY?

How Do I Get Started?

- Pray for God to prepare your Huddle.
- Select which Ministry Type(s) meets the needs of your Huddle.
 - Multi-Sport Huddle, Team Huddle, Coaches Huddle
- Seek your administration's blessing.
- As a Huddle Ministry sponsor, fill out the Ministry Leader Application online at <http://www.fca.org/mla>
- To certify your Huddle, go to <http://www.fca.org/certify>. This form will be sent to your local FCA staff to inform them of your interest in being certified.
- You can also contact your local FCA staff to certify your Huddle. To contact your local staff, go to <http://www.fca.org/quick-links/find-local-staff>.

We have developed a five-step process to build effective huddle ministries:





MULTI-SPORT HUDDLE

PRAY

- Pray for God's will in your Huddle.
- Pray for receptiveness and interest.
- Pray for the salvation of others.
- Pray for the growth and maturity of believers.
- Pray for God's continual equipping of those leading.

Helpful Tips

- Get together the key people involved with leading your huddle ministry before your first meeting for the express purpose of praying for God's direction, presence, and provision.
- Keep them updated on needs as well as how God is moving in your Huddle.

PREPARE

1. Develop a Leadership Team

- Develop a Leadership Team with student-athlete leaders based on FCA's criteria and responsibilities and have them complete an FCA Student Leader Application, which is found in the Appendix of this playbook.
- Decide which model you are going to use for your Leadership Team.

Helpful Tips

- Challenge the leadership team with the importance of making a commitment to attend each leadership meeting in order to prepare with excellence, each Huddle Meeting.
- Remind the leaders of the eternal cause of FCA and to prioritize their time around that cause.
- Pass around a commitment sheet for them to sign as a visible accountability to the entire group of their commitment.

A. Leadership Team Models

- In developing a leadership team, there are two types of models FCA encourages: a “Position-Based” leadership team or a “Task-Based” leadership team.
- A **Position-Based Leadership Team** parallels the gifts and talents of a student leader with a specific position in leadership. A student serves in this position for a year.
- A **Task-Based Leadership Team** assigns differing tasks to each leader based on their gifts and talents. These assignments are not limited to a specific time; it could be for one week, one month, or one semester.
- Remember to assign roles based on people’s personalities and gifts. An example would be that a quiet, organized person is better suited for secretary and not necessarily the best fit for opening welcome announcements.
- Every leader should lead a Workout at some point during the school year to provide spiritual leadership for the Huddle.
- Special events can be coordinated through your Leadership Team by filling roles to make sure the project(s) gets done. They can also be achieved through a special events project coordinator who plans and coordinates FCA special events during the year. Examples:
 - *Fields of Faith
 - *Service Project
 - *Team Outreach



MULTI-SPORT HUDDLE

Position-Based Leadership Team

Tasks	Position/Responsibility
Facilitate Meeting	Captain
Take Minutes	Secretary
Handle Finances	Treasurer
Communications	Promotions Coordinator - Announcements made through school media & online (Facebook, Twitter, etc.), flyers/posters displayed on campus, locker rooms, etc.

Task-Based Leadership Team

These are assigned in the Leadership Team meetings.

Tasks	Position/Responsibility
Audio/Video	A/V Coordinator - Makes sure audio is ready for exciting music before and after huddle meeting. Coordinates equipment to ensure video presentations.
Food/Drinks	Refreshment Coordinator - Coordinates all refreshments
Make people feel welcome	Greeter - Intentionally greets everyone and makes sure visitors are connected with other students.
Welcome	Gives opening welcome and announcements
Warm-up	Prepares and leads the icebreaker/ game/mixer
Workout	Either leads or secures leader of devotion/testimony
Wrap-up	Closes the meeting in prayer and final announcements or reminders

Exhibit B-20

2. Know the Basics

- A Multi-Sport Huddle **Meeting** is a small group Bible study for coaches, athletes and all whom they influence.
- A Huddle ministry's **Purpose** is evangelism, discipleship, outreach, and fellowship using the platform of athletics.
- A Huddle ministry **Strategy** has been developed to help you know who your target audience is and what the fundamental purposes are in your ministry.

A. Huddle Ministry Strategy

○ Target Audience

There are three types of audiences: Huddle members, the athletic community, and the entire campus. The Huddle members regularly attend your Huddle events and meetings. The athletic community is comprised of all teams, coaches, and athletes.

○ Purpose

The four fundamental purposes are: Share, Seek, Lead, and Love. Share is evangelism or sharing the Gospel of Jesus Christ with your campus and community. Seek is discipleship or seeking to grow and mature as a follower of Jesus Christ. Lead is reaching out to others through servant leadership that draws them to faith and growth in Jesus Christ. Love is fellowship or building relationships with others.

Target Audience + Purpose = Ministry Impact

○ Huddle Ministry Model

It is suggested that within each month you target your Huddle ministry with each of the purposes indicated. We call this the 4X9 Huddle Ministry Model, which is found in the Appendix of this playbook. With four weeks in a month and nine months in a school year, you will have nine meetings focused on Share (Present Gospel), nine meetings focused on Seek (Disciple Others), nine events focused on Lead (Reach Out), and nine events focused on Love (Fellowship Together).



MULTI-SPORT HUDDLE



4 X 9 Huddle Planning Sheet

Share — Present Gospel :

- 1.
- 2.
- 3.
- 4.
- 5.

List Presenting Plans

Seek — Disciple Others :

- 1.
- 2.
- 3.
- 4.
- 5.

List Discipling Plans

Lead — Reach Out :

- 1.
- 2.
- 3.
- 4.
- 5.

List Reaching Plans

Love — Fellowship Together :

- 1.
- 2.
- 3.
- 4.
- 5.

List Fellowship Plans

Meeting Date	January: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

Meeting Date	February: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

Meeting Date	March: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

Meeting Date	April: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

Meeting Date	May: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

Ministry Purpose = Share, Seek, Lead, Love
 Target Group = Huddle Members; Athletic Community; Entire Campus

Sample Blank Form

Reproducible forms for both semesters are found in the Forms section of the Appendix.



4 X 9 Huddle Planning Sheet

Share—Present Gospel:

1. Pro Perspectives (FCA DVD)
 2. "What is God's Purpose for my Life?" (FCA DVD)
 3. Student Athlete Testimony
 4. Sport speaker
 5. Fields of Faith
- List Presenting Plans

Meeting Date	September: Ministry Purpose	Target Group
1. Wed - 2	Cow-Tongue Football	Entire Campus
2. Wed - 9	Student Athlete Testimony	Huddle Members
3. Wed - 16	Notes of Encouragement	Athletic Comm.
4. Wed - 23	See You at the Pole	Entire Campus
5. Wed - 30	Attend & Pray @ volleyball game	Athletic Comm.

Seek—Disciple Others:

1. "Authority" Devotion (FCA Bible)
 2. Competitor's Creed study
 3. "Chasing Friends" Devotion (FCA Bible)
 4. Heart of an Athlete Study
 5. See You at the Pole
- List Discipling Plans

Meeting Date	October: Ministry Purpose	Target Group
1. Wed - 7	Balloon Bag Volleyball	Entire Campus
2. Wed - 14	Fields of Faith	Athletic Comm.
3. Wed - 21	Competitor's Creed Study	Huddle Members
4. Wed - 28	Feed the Football Team	Athletic Comm.
5.		

Lead—Reach Out:

1. Feed the Football Team after practice
 2. Write notes of Encouragement to Athletes
 3. Gatorade Giveout
 4. Attend volleyball game (Pray at the start)
 5. Coaches Breakfast
- List Reaching Plans

Meeting Date	November: Ministry Purpose	Target Group
1. Wed - 4	Human Football	Entire Campus
2. Wed - 11	"What is God's Purpose...?"	Entire Campus
3. Wed - 18	Gatorade Giveout	Athletic Comm.
4. Wed - 25	Heart of an Athlete Study	Huddle Members
5.		

Love—Fellowship Together:

1. Human Football
 2. Cow-Tongue Football
 3. Balloon Bag Volleyball
 4. Knockout Basketball
 5. Blindfold Dodgeball
- List Fellowship Plans

Meeting Date	December: Ministry Purpose	Target Group
1. Wed - 2	Knockout Basketball	Entire Campus
2. Wed - 9	"Authority" Devotion	Huddle Members
3. Wed - 16	Coaches Appreciation Breakfast	Athletic Comm.
4.		
5.		

Ministry Purpose = Share, Seek, Lead, Love
Target Group = Huddle Members; Athletic Community; Entire Campus

Sample Completed Form

Reproducible forms for both semesters are found in the Forms section of the Appendix.



MULTI-SPORT HUDDLE

B. Multi-Sport Huddle Meeting Structure

- The Huddle meeting outline consists of four parts: Welcome, Warm-Up, Workout, and Wrap-Up.

Welcome: greeting and announcements

Warm-Up: ice-breakers, games, skits, etc.

Workout: Bible studies, devotionals, and testimonials (spiritual growth component)

Wrap-Up: closing comments

- You can use the Huddle Meeting Agenda Form found in the Appendix of this playbook to help plan each individual Huddle meeting.
- Take time to familiarize yourself with FCAresources.com in order to access great warm-ups (icebreakers, skits, team-builders, etc.) and workouts (devotions, Bible studies, videos, etc.)

C. Multi-Sport Huddle Meeting Agenda

- Use this form to organize each meeting.
- Reproducible forms are found in the Forms section of the Appendix.

Multi-Sport Huddle Meeting Agenda

• Meeting Date: _____

• Meeting Purpose: _____
(Share, Seek, Lead, Love)

• Target Group: _____

• **Welcome:** greetings and announcements

• **Warm-Up:** ice-breaker, games, skit

• **Workout:** Bible studies, devotionals, testimonials

• **Wrap-Up:** closing comments

Exhibit B-24

PLAN

- Use the following checklist to make sure you are organized for your first Huddle meeting.
 - Secure day, time, and location for Huddle meetings.
 - Develop a ministry plan for the semester using the Huddle Ministry Model (4X9) form to help give you a ministry "road map" for the semester.
 - Organize your meeting each week by using the Huddle Meeting Agenda Form.
 - Task assignments based on gifts and talents of student leaders.
 - Plan an initial FCA interest meeting. Invite all students, parents, coaches, and faculty.
 - Show the FCA presentation video.
 - Challenge everyone to join you.

PROMOTE

- You can use multiple resources to get the word out about your Huddle.
- Create flyers, posters, announcements, etc. to promote upcoming Huddle meetings, activities, and events.
- Distribute promotional materials.
- Use various media to invite people: text, Facebook, Twitter, email, phone, etc.

Helpful Tips

- Assign someone to promote your Multi-Sport Huddle ministry using every method available. If you aren't intentional about getting the word out, your great planning and preparation will have a limited audience.
- Break up your leadership team into "text teams" and assign each leader a certain number of students to invite through text message on the night before and/or the day of your Huddle meeting.
- Go to FCAResources.com to download related resources:
 - Customizable Huddle Posters
 - FCA PowerPoint Template
 - Outreach Ideas
 - FCA Radio Commercials
 - FCA Logos
 - FCA Photos



MULTI-SPORT HUDDLE

PRODUCTS

Tools to Get Started

- **Preview:**

Athletes Bible - This Bible includes the Serendipity Student Bible with group and individual study helps, 500 potential small group meetings, 90 athletically focused Bible studies, 100 icebreakers and team builders, a Bible dictionary, and other study tools. This resource can be purchased at FCAgear.com.

- **Access:**

FCAresources.com - FCAresources.com brings together all of FCA's resources into one website. Devotionals, articles, outreach ideas, icebreakers, podcasts, Bible studies, videos, and more! Everyone within the ministry can search this large library and submit resources.

PRAY

- Pray for God's will in your Huddle.
- Pray for the receptiveness and interest .
- Pray for the salvation of non-Christians.
- Pray for the growth and maturity of believers.
- Pray for God's continual equipping of those leading.

Helpful Tips

- Get together the key people involved with leading your huddle ministry before your first meeting for the express purpose of praying for God's direction, presence, and provision.
- Ask some adults in your community to continually lift up your huddle ministry in prayer.
- Keep them updated on needs as well as how God is moving in your Huddle.

PREPARE

- Communicate with coaches and team members about this opportunity.
- Identify team(s) that will participate in the Team Huddle(s).
- Develop a Leadership Team with athlete leaders based on FCA's criteria and responsibilities and have them complete a student leader application.
- Review FCA Resources for Team Huddle.

PLAN

- Use the checklist to make sure you are organized for your first Team Huddle.
 - Secure day, time, and location of Team Huddle.
 - Recruit a Huddle leader or facilitator.
 - Develop a Huddle plan with timeline and specific lessons outlined.
 - Organize a weekly study agenda.
 - Plan an initial study that introduces FCA, explains what the study is about, and relays the importance of commitment and confidentiality.

PROMOTE

- Use multiple resources to get the word out about your Team Huddle.
- Create flyers to promote upcoming Bible study opportunity.
- Check with your coach to see if you can post some fliers with date, location, and time around the gym or locker rooms.
- Distribute promotional material to team members.
- Invite team members to attend the Team Huddle.

Helpful Tips

- Check with the coach first and ask for a few minutes to make the announcement to the team.
- It is a great idea to have a team member announce what the Team Huddle is and when it will begin. A personal invitation to teammates and coaches is very effective.



TEAM HUDDLE

PRODUCTS

Tools to Get Started

- **Preview:**

Team Bible - The Team Bible is specifically designed to equip, encourage and empower teams to study God's Word together. This Bible includes 32 text pages of Team Huddle material, including 20 Team Studies focusing on common issues teams face. This resource can be purchased at FCAGear.com.

Team Studies - This Bible is designed specifically for Team Huddles. It is a very practical guide through 16 key character traits that every individual and team needs to have in their life. This resource can be purchased at FCAGear.com.

Athletes Bible - This Bible and individual study helps, 500 potential small group meetings, 90 athletically-focused Bible studies, 100 icebreakers and team builders, a Bible dictionary and other study tools. This resource can be purchased at FCAGear.com.

- **Access:**

FCaresources.com - FCaresources.com brings together all of FCA's resources into one website. Devotionals, articles, outreach ideas, icebreakers, podcasts, Bible studies, videos, and more! Everyone within the ministry can search this large library and submit resources.

PRAY

- Pray for God's will in your Huddle.
- Pray for the receptiveness and interest.
- Pray for the salvation of non-Christians.
- Pray for the growth and maturity of believers.
- Pray for God's continual equipping of those leading.

PREPARE

- Contact each coach about the Coaches Huddle opportunity.
- Rally the involvement of coaches interested.
- Review FCA Resources for Coaches Huddle.

PLAN

- Use the following checklist to make sure you are organized for your first Coaches Huddle.
 - Secure day, time, and location of Bible study.
 - Recruit a Bible study leader or facilitator.
 - Develop a Bible study plan with timeline and specific lessons outlined.
 - Organize a weekly study agenda.
 - Plan an initial study that introduces FCA, explains what the study is about, and relays the importance of commitment and confidentiality.

Helpful Tips

- Get key people involved with leading your huddle ministry together before your first meeting for the express purpose of praying for God's direction, presence and provision.
- Ask some adults in your community to continually lift up your Huddle Ministry in prayer.
- Keep them updated on needs as well as how God is moving in your Huddle.

Helpful Tips

- Use these great, free resources for your coaches ministry:
 - Browse the Heart of a Coach Devotionals at fcaresources.com.
 - Browse other free group Bible studies for material at fcaresources.com.



COACHES HUDDLE

PROMOTE

- You can use multiple resources to get the word out about your Coaches Huddle.
- Post some fliers with date, location, and time around the gym or locker rooms.
- Invite coaches to attend the Huddle study.
- Distribute promotional material to coaches.

PRODUCTS

Tools to Get Started

- **Preview:**

Athletes Bible - This Bible includes the Serendipity Student Bible with group and individual study helps, 500 potential small group meetings, 90 athletically-focused Bible studies, 100 icebreakers and team builders, a Bible dictionary, and other study tools. This resource can be purchased at FCAgear.com.

3 Dimensional Coaching Companion Bible Study - This Companion Bible Study is designed to be used in small group settings by coaches who are enrolled in the 3D+ Course. This resource expounds upon the faith-based principles that are introduced in the online training.

- **Access:**

FCAresources.com - FCAresources.com brings together all of FCA's resources into one website. Devotionals, articles, outreach ideas, icebreakers, podcasts, Bible studies, videos, and more! Everyone within the ministry can search this large library and submit resources.

FCACoachesAcademy.com - The FCA 3Dimensional Coaches Academy is a three course training curriculum designed to help coaches become transformational in their coaching by fulfilling their transformational purpose. The result is that coaches learn to coach their players in all three dimensions (body, mind, heart) from a faith-based perspective.



FELLOWSHIP OF CHRISTIAN ATHLETES

TOOLS

**HUDDLE
PLAYBOOK**

Exhibit B-32

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PRODUCTS

Bibles

- Athletes Bible
- Power Bible
- Team Bible
- The Coaches Bible
- The Competitor's Bible
- Sports New Testament (Spanish and English versions)

Study/Devotion

- Character Studies
- Team Studies
- Heart of the Competitor
- Heart of a Coach
- Heart of an Athlete
- Core Value Series
- Leadership Bible Studies
- Victory 365

Discipleship

- A Biblical Approach to InSideOut Coaching
- 3Dimensional Coaching Companion Bible Study

Online Resources

- Everything FCA - fca.org
- FCAcampustools.com
- Merchandise - fcagear.com
- Ministry Resources - fcaresources.com
- 3Dimensional Coaching - fcacoachesacademy.com



PROGRAMS AND PEOPLE

Programs

- Fields of Faith – fieldsofffaith.com
- Day of Champions
- Sports Rallies
- Sport-Specific Outreaches
- Leadership Trainings

People

- FCA Staff
- Local Community Members
- FCA Board
- Adult Huddles
- Booster Clubs
- Youth Pastors and Church Ministers



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Exhibit B-35



FELLOWSHIP OF CHRISTIAN ATHLETES

APPENDIX

**H U D D L E
P L A Y B O O K**

Exhibit B-36

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FCA Huddle Constitution

Article I - Name

The name of the organization shall be the (name of the school) Fellowship of Christian Athletes.

Article II - Mission

The mission of the Fellowship of Christian Athletes is "To lead every coach and athlete into a growing relationship with Jesus Christ and His church."

FCA is a Christian community that is led by those who serve FCA's mission as its representatives, including all of FCA's directors, officers, employees and volunteer leaders, each of whom is an integral part of the community (and are described in this Manual as "FCA representatives"). Both of FCA's mission and the association of FCA's representatives are an exercise and an expression of FCA's Christian beliefs.

Article III - Qualifications of Members

As the purpose states, FCA is targeted at reaching athletes and coaches. In order to best reach this group through the Huddle, participants of Huddles are to be current or former members of recognized school athletic teams and those who carry an interest in athletics.

FCA should not become an exclusive "club," with restricted membership; however, a key principle in FCA's strategy for reaching "athletes and coaches" is for the commonality of athletics with those in the group to remain obvious.

Article IV - Officers and Elections

► Section I: Officers to be Elected

The (name of school) Fellowship of Christian Athletes shall have officers as follows:

1. Captain
2. Co-Captain
3. Recruiter
4. Secretary
5. Treasurer

► Section II: Qualifications of Officers

To express and exercise FCA's Christian beliefs, every FCA student leader must contribute to FCA's Christian character and mission (see page 40), perform all of his or her duties as a service to God, and model FCA's Christian beliefs for the larger community.



GUIDELINES

Accordingly, a officer must be a member of the (name of school) Fellowship of Christian Athletes and an FCA student leader who has affirmed his or her agreement with FCA's Statement of Faith and mission (and has been certified as such by the National FCA.) meet any qualifications set by the school for holding office in an organization that is consistent with FCA's mission and beliefs.

► **Section III: Duties of Officers**

- A. Captain will preside over all meetings, work with other Huddle officers and Huddle Coaches in planning programs, give direction in setting group goals and demonstrate Christian leadership qualities.
- B. Co-Captain will assist the Captain in any way, inform the Huddle of meeting time and place, assist in program planning and take care of any physical needs of the meeting.
- C. Recruiter will promote FCA activities among coaches and athletes.
- D. Secretary will provide administrative support of Huddle activities.
- E. Treasurer will be responsible for processing any funds acquired by the Huddle.

► **Section IV: Elections**

Election of officers will be held once a year, preferably during March or April. This will allow newly elected officers to be trained by the existing officers and have opportunity to attend FCA Leadership Camp in the summer. Potential officer candidates will be screened by existing officers and Huddle Coach to ensure their commitments to FCA's beliefs and mission. A majority vote will be necessary for an officer to be elected. In case of no majority, a runoff will be held immediately.

Article V - Meetings

Meetings will be held weekly or twice a month and can be conducted in an atmosphere where fellowship, growth and outreach can be accomplished.

Article VI - Amendments

Amendments to this Constitution may be proposed by any Huddle officer. Amendments shall become effective if approved by the executive leadership of the organization. All policies of the said group must be consistent with the policies of the Fellowship of Christian Athletes Support Center, 8701 Leeds Road, Kansas City, MO 64129, (800) 289-0909 or (816) 921-0909.

The Equal Access Act

(Title VIII of Public Law 98-377)

Short Title

Sec. 801. This title may be cited as "The Equal Access Act."

Denial of Equal Access Prohibited

Sec. 802.

- (a) It shall be unlawful for any public secondary school which receives Federal financial assistance and which has a limited open forum to deny equal access or a fair opportunity to, or discriminate against, any students who wish to conduct a meeting within that limited open forum on the basis of the religious, political, philosophical, or other content of the speech at such meetings.
- (b) A public secondary school has a limited open forum whenever such school grants an offering to or opportunity for one or more non-curriculum related student groups to meet on school premises during non-instructional time.
- (c) Schools shall be deemed to offer a fair opportunity to students who wish to conduct a meeting within its limited open forum if such school uniformly provides that-
- (1) the meeting is voluntary and student-initiated;
 - (2) there is no sponsorship of the meeting by the school, the government, or its agents or employees;
 - (3) employees or agents of the school or government are present at religious meetings only in a nonparticipatory capacity;
 - (4) the meeting does not materially and substantially interfere with the orderly conduct of educational activities within the school; and
 - (5) nonschool persons may not direct, conduct, control, or regularly attend activities of student groups.
- (d) Nothing in this title shall be construed to authorize the United States or any State or political subdivision thereof -
- (1) to influence the form or content of any prayer or other religious activity;
 - (2) to require any person to participate in prayer or other religious activity;
 - (3) to expend public funds beyond the incidental cost of providing the space for student-initiated meetings;



GUIDELINES

- (4) to compel any school agent or employee to attend a school meeting if the content of the speech at the meeting is contrary to the beliefs of the agent or employee;
 - (5) to sanction meetings that are otherwise unlawful;
 - (6) to limit the rights of groups of students which are not of a specified numerical size; or
 - (7) to abridge the constitutional rights of any person.
- (e) Notwithstanding the availability of any other remedy under the Constitution or the laws of the United States, nothing in this title shall be construed to authorize the United States to deny or withhold Federal financial assistance to any school.
- (f) Nothing in this title shall be construed to limit the authority of the school, its agents or employees, to maintain order and discipline on school premises, to protect the well-being of students and faculty, and to assure that attendance of students at meetings is voluntary.

Definitions

Sec. 803. As used in this title -

- (1) The term "secondary school" means a public school which provides secondary education as determined by State law.
- (2) The term "sponsorship" includes the act of promoting, leading, or participating in a meeting. The assignment of a teacher, administrator, or other school employee to a meeting for custodial purposes does not constitute sponsorship of the meeting.
- (3) The term "meeting" includes those activities of student groups which are permitted under a school's limited open forum and are not directly related to the school curriculum.
- (4) The term "noninstructional time" means time set aside by the school before actual classroom instruction begins or after actual classroom instruction ends.

Severability

Sec. 804. If any provision of this title or the application thereof to any person or circumstances is judicially determined to be invalid, the provisions of the remainder of the title and the application to other persons or circumstances shall not be affected thereby.

Construction

Sec. 805. The provisions of this title shall supersede all other provisions of Federal law that are inconsistent with the provisions of this title.

For further information or a copy of the "Equal Access Guidelines" write or phone:

Alliance Defense Fund

15100 N. 90th St., Scottsdale, AZ 85260
(800)TELLADF (800-835-5233), (480) 444-0020, FAX: (480) 444-0025
alliancedefensefund.org

The American Center for Law and Justice

P.O. Box 90555, Washington, D.C. 20090-0555
(757) 226-2489, FAX: (757) 226-2836, aclj.org

Christian Legal Society

8001 Braddock Road, Suite 300, Springfield, VA 22151
(703) 642-1070, FAX: (703) 642-1075, clsnet.org, clshq@clsnet.org

National Legal Foundation

P.O. Box 64427, Virginia Beach, VA 23467-4427
(757) 463-6133, FAX: (757) 463-6055, nlf.net, nlf@nlf.net

The Rutherford Institute

P.O. Box 7482, Charlottesville, VA 22906-7482
(434) 978-3888, FAX: (434) 978-1789, rutherford.org, staff@rutherford.org

You may also contact the FCA Support Center at (800) 289-0909,
or (816) 921-0909, ext. 555.



GUIDELINES

Students Bill of Rights on a Public Campus

I. THE RIGHT to Meet with Other Religious Students

The Equal Access Act allows students the freedom to meet on campus for the purpose of discussing religious issues.

II. THE RIGHT to Identify Your Religious Beliefs through Signs and Symbols

Students are free to express their religious beliefs through signs and symbols.

III. THE RIGHT to Talk about Your Religious Beliefs on Campus

Freedom of speech is a fundamental right mandated in the Constitution and does not exclude the school yard.

IV. THE RIGHT to Distribute Religious Literature on Campus

Distributing literature on campus may not be restricted simply because it is religious.

V. THE RIGHT to Pray on Campus

Students may pray alone or with others so long as it does not disrupt school activities or is not forced on others.

VI. THE RIGHT to Carry or Study Your Bible on Campus

The Supreme Court has said that only state directed Bible reading is unconstitutional.

VII. THE RIGHT to Do Research Papers, Speeches, and Creative Projects with Religious Themes

The First Amendment does not forbid all mention of religion in public schools.

VIII. THE RIGHT to Be Exempt

Students may be exempt from activities and class content that contradict their religious beliefs.

IX. THE RIGHT to Celebrate or Study Religious Holidays on Campus

Music, art, literature, and drama that have religious themes are permitted as part of the curriculum for school activities if presented in an objective manner as a traditional part of the cultural and religious heritage of the particular holiday.

X. THE RIGHT to Meet with School Officials

The First Amendment to the Constitution forbids Congress to make any law that would restrict the right of the people to petition the Government (school officials).

This single page, Students' Bill of Rights on a Public School Campus, may be duplicated without permission from the publisher. Parchment copies of this page (suitable for framing) and/or the book, Students' LEGAL RIGHTS on a Public School Campus (detailing each right), may be obtained by calling or writing the Publisher. Roever Communications, P.O. Box 136130, Ft. Worth, TX 76136, (817) 237-2587.

FCA Christian Community Statement

FCA is a Christian community led by individuals who serve as representatives of FCA's Mission, including all FCA's trustee, staff, and volunteer ministry leaders. Each of these individuals is an integral part of the FCA community and are described for purposes of this statement as "FCA Representatives."

Those who are not FCA Representatives but are participants in our community include coaches, athletes, guests at Huddles and other events, and volunteers serving in support roles. These participants make significant contributions through their involvement in our Christian community, however, these participants do not represent FCA unless they are also serving in one of the FCA representative roles identified in the paragraph above.

FCA exercises and expresses its beliefs in various ways, including:

As a Community: We believe that God calls people to live out their faith in community with other believers. Accordingly, our Christian community is itself an exercise and expression of our Christian beliefs.

Through Our Activities: We believe that all of our activities should express our beliefs and be rendered in service to God as a form of worship. As such, all FCA activities further our Christian mission and purposes and are an exercise and expression by FCA of our Christian beliefs.

FCA's Christian Beliefs

FCA's Christian beliefs are comprised of the FCA Statement of Faith and FCA Mission Statement.

FCA Statement of Faith

We believe the Bible to be the only inspired, trustworthy and true, without error, Word of God. (2 Timothy 3:16-17)

We believe there is only one God who eternally exists in three persons: Father, Son and Holy Spirit. (Matthew 28:19)

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GUIDELINES

We believe Jesus Christ is God, in His virgin birth, in His sinless life, in His miracles, in His death that paid for our sin through His shed blood, in His bodily resurrection, in His ascension/rising up to the right hand of the Father and in His personal return in power and glory. (John 1:1; Matthew 1:18,25; Hebrews 4:15; Hebrews 9:15-22; 1 Corinthians 15:1-8; Acts 1:9-11; Hebrews 9:27-28)

We believe that acceptance of Jesus Christ and the corresponding renewal of the Holy Spirit are the only paths to salvation for lost/sinful men and women. (John 3:16; John 5:24; Titus 3:3-7)

We believe in the present ministry of the Holy Spirit, who lives within and guides Christians so they are enabled to live godly lives. (John 14:15-26; John 16:5-16; Ephesians 1:13-14)

We believe in eternal life, and that through belief in Jesus Christ as the Son of God, we spend eternity with the Lord in Heaven. We believe that in rejecting Jesus Christ as Lord and Savior, we receive eternal suffering in hell. (Matthew 25:31-46; 1 Thessalonians 4:13-18)

We believe in the spiritual unity of believers in our Lord Jesus Christ, that all believers are members of His body, the Church. (Philippians 2:1-4)

We believe God's design for sexual intimacy is to be expressed only within the context of marriage, that God created man and woman to complement and complete each other. God instituted marriage between one man and one woman as the foundation of the family and the basic structure of human society. For this reason, we believe that marriage is exclusively the union of one man and one woman. (Genesis 2:24; Matthew 19:5-6; Mark 10:6-9; Romans 1:26-27; 1 Corinthians 6:9)

We believe that God created all human beings in His image. Therefore, we believe that human life is sacred from conception to its natural end; that we must honor the physical and spiritual needs of all people; and by following Christ's example, we believe that every person should be treated with love, dignity and respect. (Psalm 139:13; Isaiah 49:1; Jeremiah 1:5; Matthew 22:37-39; Romans 12:20-21; Galatians 6:10)

Mission Statement

FCA exists to accomplish the following mission; ensuring all program activities of the ministry shall be structured and conducted accordingly:

To lead every coach and athlete into a growing relationship with Jesus Christ and His church.

Christian Expression and Exercise of Beliefs

FCA maintains a faith-based community as an exercise of FCA's Statement of Faith. In addition, FCA subscribes to the Christian belief that all its activities, including the duties of FCA Representatives, should express FCA's beliefs and be rendered as a service to God.

FCA Representative Obligations

To express and exercise FCA's Christian beliefs, all FCA Representatives shall contribute to FCA's Christian Character and Mission. Each FCA Representative shall be expected to model FCA's Christian beliefs within the greater community, perform all their duties as a service to God, and comply with the following obligations:

- **Beliefs:** Each FCA representative shall affirm his or her agreement with FCA's Statement of Faith and shall not subscribe to or promote any religious beliefs inconsistent with these beliefs.
- **FCA Christian Community and Conduct Standards:** FCA Representatives shall always (during both working and non-working hours) endeavor to conduct themselves in a manner that affirms biblical standards of conduct in accordance with FCA's Christian beliefs.
- **Distinctly Christian Activities:** Each FCA Representative shall be ready, willing, and able to lead or contribute to distinctly Christian activities such as worship and prayer services.

Volunteers, Program Participants, and Guests

Guests and volunteers who are serving in ministry support roles as community participants (not in representative roles) are generally not required to affirm our Christian beliefs. During their participation in our community, such participants are expected to respect our beliefs, support FCA's Mission, and comply with applicable community standards. We may give preference for volunteer positions to individuals who share our Christian beliefs.

Program Participants

FCA is a Christian community that exercises Christian beliefs described in the FCA Statement of Faith. All FCA activities and events should express its beliefs and be rendered as a service to God.



GUIDELINES

FCA believes that all people are of great worth and value to God. In Romans 3:23, the Bible declares that all people have sinned and are in need of Christ's forgiveness and restoration. Following Christ's example, FCA strongly believes that every person should be treated with love, dignity, and respect.

FCA invites everyone to participate in our ministry programs such as Huddle meetings, camps, Bible studies, and events. All FCA activities are open to anyone regardless of their personal beliefs.

FCA believes the good news of Jesus Christ is for all people, therefore everyone is welcome to attend FCA ministry activities and events (Luke 2:10).

FCA believes that every person must be afforded compassion, love, kindness, respect, and dignity (Mark 12:28-31; Luke 6:31). Hateful and harassing behavior or attitudes directed toward any individual are not in accordance with the biblical beliefs of FCA.

Although participants generally do not represent the FCA Christian community, they do contribute to our community, to the experiences of other participants, and to the accomplishment of FCA's Mission. Accordingly, we expect program participants to respect our beliefs and abide by the Christian community standards applicable to them.

Preserving FCA's Christian Character and Mission

Noncompliance by Representatives: Should any FCA Representative not comply with FCA's Christian beliefs, said representative shall have an obligation to disclose such noncompliance to FCA. FCA may determine whether said representative intends or is likely to continue in such noncompliance. If so, FCA may dismiss the representative from his or her position on the basis that noncompliance is inconsistent with and undermines the expression and exercise of the Christian Character and Mission of the organization.

Mission Partners/Volunteers: Volunteers working with FCA in a capacity other than as a leader shall not be considered representatives of FCA's faith-based community. Volunteers serving with FCA shall understand that they agree to support FCA's Mission and Values.

Affirmation: Each FCA Representative must affirm that, (1) he or she understands, affirms, and agrees to be bound by the FCA Statement of Faith and Mission, and (2) as a member of the FCA community of faith, he or she will be held accountable by FCA to abide by this Statement of Faith.

FCA Youth Protection Policy

As part of our purpose and in accordance with our Christian beliefs, we seek to provide every youth, participant, and staff person with a safe, fulfilling experience. We expect all staff to promote a positive, nurturing environment for our youth and other participants, and to closely follow all FCA youth protection guidelines and directives.

Guidelines for FCA Representatives

I. Behavior Policy

1. FCA expects all paid staff and volunteers, in every aspect of their involvement with FCA activities and programs, to exhibit exemplary language and conduct, consistent with FCA's ministry purpose, Sexual Purity Policy, and moral and theological beliefs.
2. FCA prohibits staff members and volunteers from:
 - a. Engaging in any dating and romantic or sexual activity or relationship with the young people and adults who participate in our programs, except that student leaders may date other student participants.
 - b. Using sexually explicit language or jokes, or possessing or viewing lewd or pornographic materials in the presence of participants or others.
 - c. Engaging in any sexual relations or activities that constitute sexual offenses as defined by federal or state law.
 - d. Using language or behavior that involves violence or is derogatory, threatening, abusive, or harassing.
 - e. Using alcohol, drugs or tobacco (chewing or smoking) while leading or participating in an FCA activity.
3. In addition, FCA expects staff members and volunteers involved in our programs to be attentive to the physical and emotional abilities and needs of participants, and to avoid situations that could cause participants to suffer an accident or injury.
4. Any FCA representative who is found by FCA to have violated this Behavior Policy, or FCA's Sexual Purity Policy, or any of the guidelines below, may be immediately terminated or subjected to disciplinary action, all in the discretion of FCA.



GUIDELINES

II. Prevention Guidelines: Barriers to Abuse

- 1. Team Leadership** - Whenever feasible a youth will not be in the primary care or supervision of only one adult. Teams of leaders will supervise activities. Where possible, experienced adult workers should be included with adults who are newcomers to youth work.
- 2. Athletic Activities** - The excitement, emotions, and stress of athletic activities can give rise to inappropriate language and physical contact. FCA representatives must refrain from jokes, remarks, exclamations, and physical touch that could be perceived as negative or suggestive. Also, be aware of the physical needs of the athlete, such as fatigue, the need for fluids, treatment of an injury, and weather conditions (such as electrical storms or extreme heat).
- 3. Individual Counseling** - Counseling with youth should be in the nature of spiritual counseling. Coaching and mentoring on ordinary problems and challenges of growing up is also acceptable. Counseling should not involve therapy or advice concerning mental or emotional illness, suicidal thoughts, drug abuse, or pregnancy. Generally parents should be advised of these more serious problems. In some instances, the youth should be referred to a professional (see procedures below under Long-term Counseling). Team counseling is preferable whenever possible. When team counseling sessions are not feasible, notify your program leader in advance of the location and with whom you are meeting. Counseling must always be done in a public place (lobby, courtyard, snack shop, etc.) where private conversations are possible but occur in full view of others. Guard carefully to avoid seclusion. Be especially careful to have female adults counsel female youths and males counsel males. A male/female team is generally appropriate for counseling either gender.
- 4. Long-term Counseling** - FCA representatives (especially at camp) should avoid entering into long-term individual counseling relationships with participants. Generally, you should not be meeting with a youth for counseling more than three times. FCA representatives should report all counseling contacts to their program leader. Adult leaders are generally not prepared or supported for long-term counseling or formal therapy.

Instead, refer youth who have a need for long-term counseling to professionals in the community. Before making a referral, always consult with your program leader about the need for referral and how to make the referral. It is usually appropriate to notify and make the referral through a parent/guardian.

- 5. Informal Contact (Independent of FCA Activities)** – Informal contact refers to phone calls, cards, face-to-face contact, or other communication between an FCA representative and a youth that is not connected to “official” FCA activities. FCA recognizes that informal contact between FCA representatives and youth frequently occurs and can be very beneficial for Christian and social reasons. For example, staff may hire teens as baby-sitters for their own children, or staff may see kids during social events with the child’s family. This interaction is usually legitimate and beneficial. However, staff should seek permission of parents, and report plans for such contact to the FCA program leader before having informal contact with the child. The staff member should clearly let the parent know the nature of the contact and that it is not part of an FCA activity. Parents are responsible for monitoring this informal contact. In follow-up to an FCA activity or event, FCA representatives should only send post cards, not letters. Follow-up emails must be sent from an FCA computer, not a home computer.
- 6. Be Aware of “Fantasy Relationships”** – Refrain from spending an inordinate amount of time with any one participant that could lead the participant to misread your interest in him or her or become too strongly tied to you. Be aware of how you express your concern for the student. When you express love, be sure students know you mean Christian love.
- 7. Youth Supervising Youth** – Minors may help adults lead youth activities only under the direct leadership of a screened and trained adult. Minors must also be screened and trained (as appropriate for their age). Minors under 16 years of age generally should not be permitted to help lead youth activities. Minors in leadership roles should not be left alone and unsupervised with youth participants.
- 8. Overnight Activities** – At least two adults will supervise overnight activities. If the participants are male and female, then male and female chaperons must be present. It is never appropriate for an adult chaperon who is not a family member to share a bed with a youth. Males and females attending events must not share the same sleeping quarters and should have separate access to bathroom facilities. Younger minors should be provided sleeping and changing facilities separate from older minors. Experienced adult workers should be included with adults who are new-comers to youth work.
- 9. Transportation** – FCA may from time to time provide transportation as an official part of an activity. When children or youth are transported as a part of an activity, follow the “two adult rule” whenever possible. Avoid situations



GUIDELINES

where one adult is alone with one youth. In addition, never allow a child to be left alone in a vehicle. All other guidelines also apply.

- 10. Confidentiality** - Youth workers must report to a program leader if a minor discusses harming himself or others, committing a crime, or being abused. There are limits to confidentiality when working with youth. Where necessary, explain clearly to youth that there are some circumstances where you are required to “tell” what the youth discloses. Questions about such cases or other issues of confidentiality must be discussed promptly with the program leader. While you should generally maintain the confidentiality of personal information provided to you by participants, at the same time you should never promise complete confidentiality. If a child confides to you that he has been sexually or physically abused by a family member or another, you may have a legal obligation to report this to the authorities. In addition, if the child tells you that he has committed or plans to commit a crime, or plans to harm himself, you may need to report this to the authorities as well.
- 11. Gifts** - Youth workers should not give personal gifts or money to youth. Gifts can be easily misinterpreted. With the advance approval of the program leader, small gifts given to groups of young people can be allowed, such as graduation presents or awards for participation.
- 12. Physical Contact** - In athletic activities, physical contact between players and between coaches and players is often a necessary part of practice and the game. Certain kinds of physical touch however, are inappropriate. While “high-fives,” side-hugs, and pats on the shoulder are usually acceptable, full-hugs, patting the buttocks, and back rubs or massages are not acceptable. Do not allow “piling on” or “dog piles” after a game or practice. Roughhousing and horseplay also should be discouraged, because they can lead to injury.
- 13. Corporal Punishment** - Corporal punishment (hitting or spanking) and other forms of punishment involving physical pain are never appropriate. This rule holds true even if parents have suggested or given permission for corporal punishment. Youth workers must consult their supervisors or program leader if they need help with discipline techniques.
- 14. Open Door Policy** - All FCA events are “open door.” This means that staff and parents have a right to observe any activity. FCA does not practice secret activities, initiations, or rituals.
- 15. Dating or Sexual Involvement** - No adult youth worker is to date a youth or be romantically or sexually involved with a youth.

- 16. Appearance of Misconduct** - Staff must avoid even the appearance of misconduct. This is necessary in order to maintain parental confidence and avoid mistaken allegations. Appropriate physical contact (see #12 above) in group settings is okay and can be a positive dynamic. However, be cautious of any touching actions that can be misleading to individuals receiving the touch or those observing.
- 17. Unsupervised Areas** - Make unsupervised or isolated areas off-limits to youth. Youth should not be allowed to return to cabins or sleeping areas except in groups or with supervision. Develop a plan among leaders for periodic monitoring and checking of unsupervised areas.
- 18. Youth Conversation** - Youth should be instructed that sexual talk and gestures are not tolerated. Youth who make sexual remarks to other youth should be reprimanded, and such language should be reported to the program leader.
- 19. Supervision and Communication** - Youth workers should consult with the youth program leader to discuss any issues regarding these guidelines. Appropriate topics that must be discussed include problems, accountability, policy clarification, personal feelings, or other issues that may affect youth worker efforts.
- 20. Feedback from Youth and Parents** - A leader designated to receive complaints from youth should be identified at every camp. All youth should be made aware of this individual and of his or her availability to listen to problems or complaints. All parents should be provided the name and contact information for this leader. Parents should also be provided an 800-number for complaints and questions. All youth, parents, and adult/coach participants should be provided a comment form following camp or an event, on which they can identify problems or concerns. Please promptly forward copies of all forms received to the FCA Support Center, and please flag all forms that include complaints or that raise safety issues.
- 21. Focus on these spiritual guidelines while working with young people:**
- 1 Thessalonians 2:11,12 - For you know that we dealt with each of you as a father deals with his own children, encouraging, comforting and urging you to live lives worthy of God, who calls you into his kingdom and glory.
- 1 Thessalonians 5:22 - Avoid every kind of evil.
- Philippians 4:8 - Finally brothers, whatever is true, whatever is noble, whatever is right, whatever is pure, whatever is admirable - if anything is excellent or praiseworthy - think about such things.



GUIDELINES

James 3:8-10 – ...but no man can tame the tongue. It is a restless evil, full of deadly poison. With the tongue we praise our Lord and Father, and with it we curse men, who have been made in God's likeness. Out of the same mouth come praise and cursing. My brothers, this should not be.

Reporting Procedures

1. If an FCA representative observes or suspects that any other representative has engaged in conduct that violates the Behavior Policy or any other FCA policy or guideline, the FCA representative must report this IMMEDIATELY to his/her FCA program leader. If the FCA program leader is observed or suspected of engaging in misconduct, this must be reported directly to the Chief Administrative Officer at the FCA Support Center.
2. FCA program leaders who receive reports of misconduct are expected to report any information they have received IMMEDIATELY to the Executive Vice President of Human Resources at the Support Center and to coordinate the local response with the Support Center.
3. Representatives and program leaders should refrain from investigating the situation, contacting the person alleged to have engaged in misconduct, or discussing the details with any person other than Support Center personnel designated above until the matter can be discussed with Support Center Personnel.
4. If there is a likelihood of injury to the victim or others, the authorities and/or emergency personnel may have to be contacted before the matter can be discussed with the FCA Support Center. In addition, it may be necessary to place the representative accused of misconduct on suspension or administrative leave and to instruct the representative to cease contact with the victim and others.
5. Failure to report suspected or observed misconduct may result in immediate dismissal from employment or volunteer assignments with FCA or disciplinary action, all at the discretion of FCA.

Primary contact is:

Ken Williams
 Chief Administrative Officer
 Cell Phone: (816) 674-8785
 (816) 921-0909 or (800) 289-0909
 Extension: 1146

If you are unable to reach Ken Williams, secondary contact is:
 Jeff Martin
 Executive Director
 Ministry Advancement
 (816) 921-0909 or (800) 289-0909

Exhibit B-52

Huddle Policies for Handling Funds

"All funds and/or property received by or coming into the custody of any Huddle group shall be the property of the Fellowship of Christian Athletes to be expended or applied only for the purposes and in accordance with the policies and regulations prescribed by the Board of Trustees."

A local checking account can be set up at a bank by an FCA Huddle group. When setting up the checking account, the bank will require all those signing checks to sign a signature card on file with the bank.

For control purposes, it is necessary that an employee of FCA also be included on the signature card, although they will not be involved in signing checks for normal account transactions. In addition to this FCA employee, others on the signature card should include the leadership of the FCA Huddle.

The bank signature card should be updated periodically to reflect current information. Copies of the signature card and related banking agreements must be filed with the local FCA office.

According to FCA policy, when writing a check, two signatures are required for withdrawal of monies. When setting up the account, please notify the bank of this double signature policy, so that they can set up the account accordingly. The two signatures on checks should include the signatures of both the Huddle Coach and one of the authorized officers on the checking account. Funds solicited and/or generated by the Huddle fall into two categories:

1) Non-contribution Gifts: The amount of money received equals the services rendered to the person giving the gift. Examples include: merchandise sales, price of admission for a breakfast/lunch/dinner program, car wash proceeds, payment of money due for retreat and/or Camp for specific students. Non-contribution gifts are not eligible as a tax deduction; therefore, these monies must be deposited directly into the local checking account.

2) Contribution Gifts: These are funds given to the Huddle to support the needs of the FCA ministry with no services or consideration rendered to the donor. Examples include: non-designated scholarship money for retreat and/or Camps, etc.

It is necessary for donors to have proper tax-deductible receipts in order to claim this gift.



GUIDELINES

To satisfy IRS requirements, contribution gifts should be sent to:

Fellowship of Christian Athletes

Attn: Receipting

8701 Leeds Road

Kansas City, MO 64129

A tax deductible receipt for the gift will be generated for the donor and properly credited to the Huddle. The Huddle is responsible to spend the money in accordance with FCA policies. To record contribution gifts use the Funds Returned Contribution Transmittal form for Huddles. The funds will be returned to the Huddle, less an 11% administrative charge. In the event a Huddle has annual gross receipts in excess of \$25,000, the Huddle must immediately contact the Support Center for special guidance.

GUIDELINES

Insurance Coverage for FCA Activities

Note: All insurance plans are effective as indicated on the following pages. As FCA renews its insurance policies, FCA will provide Huddles with updated information if there are any changes.

Liability Insurance Coverage

FCA carries General Liability insurance which protects the corporation of FCA, staff, volunteers, students, and other individuals who are directly associated with FCA. This protects FCA if there should be a liability suit filed against any one of the above by a third party as the result of a defined list of actions, the main one being negligence while acting as an agent of FCA.

EXAMPLE: A Huddle member is seriously injured as the result of the negligence of the Huddle Coach. If the Huddle Coach is found guilty of negligence, any judgment not covered by other insurance would be covered by FCA's Liability Insurance up to the limit of coverage. Liability Insurance does not cover items like medical costs (i.e., surgery to repair torn ligaments, etc.) related to athletic activity.

This is an important benefit of becoming an official or certified Huddle Ministry Group. A noncertified FCA group is not covered by this liability policy.

Some public and private entities (i.e., schools, cities, campgrounds) that FCA deals with may require certification of Liability Insurance coverage from FCA. Certification is provided upon request, at no cost, in the form of a CERTIFICATE OF INSURANCE. NOTE: Certification is proof that we carry this form of insurance. It is NOT an insurance policy document, but an official certification that we carry this form of insurance in our policy. Our insurance company has requested that FCA use a Release and Waiver of Liability/Permission Forms for participants for activities outside the scope of normal huddle meetings, (i.e. weekend retreats, unique huddle meetings, etc.) Please use the appropriate form for participants under the age of 18 or for participants over the age of 18.

Thank you for your help with this matter. If you have any questions, please contact the Special Event Insurance Department at 800-289-0909. To obtain a CERTIFICATE OF INSURANCE, complete the Certificate of Liability Insurance Request Form found in the back of this playbook and mail it at least three weeks prior to the event.



FORMS

Release and Waiver of Liability, Assumption of Risk, and Indemnity Agreement (“Agreement”) - Minor Participant

In consideration of participating in the _____

I represent that I understand the nature of this Activity and that I am qualified, in good health, and in proper physical condition to participate in such Activity. I acknowledge that if I believe event conditions are unsafe, I will immediately discontinue participation in the Activity.

I fully understand that this Activity involves risks of serious bodily injury, including permanent disability, paralysis and death, which may be caused by my own actions, or inactions, those of others participating in the event, the conditions in which the event takes place, or the negligence of the “releasees” named below; and that there may be other risks either not known to me or not readily foreseeable at this time; and I fully accept and assume all such risks and all responsibility for losses, costs, and damages I incur as a result of my participation in the Activity.

I hereby release, discharge, and covenant not to sue The Fellowship of Christian Athletes, its respective administrators, directors, agents, officers, volunteers, and employees, other participants, any sponsors, advertisers, and, if applicable, owners and lessors of premises on which the Activity takes place, (each considered one of the “RELEASEES” herein) from all liability, claims, demands, losses, or damages on my account caused or alleged to be caused in whole or in part by the negligence of the “releasees” or otherwise, including negligent rescue operations; and I further agree that if, despite this release, waiver of liability, and assumption of risk I, or anyone on my behalf, makes a claim against any of the Releasees, I will indemnify, save, and hold harmless each of the releases from any loss, liability, damage, or cost which any may incur as the result of such claim.

I have read this RELEASE AND WAIVER OF LIABILITY, ASSUMPTION OF RISK, AND INDEMNITY AGREEMENT, understand that I have given up substantial rights by signing it and have signed it freely and without any inducement or assurance of any nature and intend it be a complete and unconditional release of all liability to the greatest extent allowed by law and agree that if any portion of this agreement is held to be invalid the balance, notwithstanding, shall continue in full force and effect.

Printed name of Participant

Date:

Signature of Participant

Parental Consent

AND I, the minor’s parent and/or legal guardian, understand the nature of the above referenced activities and the minor’s experience and capabilities and believe the minor to be qualified to participate in such activity. I hereby release, discharge, covenant not to sue and AGREE TO INDEMNIFY AND SAVE AND HOLD HARMLESS each of the Releasees from all liability, claims, demands, losses, or damages on the minor’s account caused or alleged to have been caused in whole or in part by the negligence of the Releasees or otherwise, including negligent rescue operations, and further agree that if, despite this release, I, the minor, or anyone on the minor’s behalf makes a claim against any of the above Releasees, I WILL INDEMNIFY, SAVE AND HOLD HARMLESS each of the Releasees from any litigation expenses, attorney fees, loss liability, damage, or cost any Releasee may incur as the result of any such claim.

Printed name of Parent/Guardian

Date:

Signature of Parent/Guardian

Exhibit B-56



Release and Waiver of Liability, Assumption of Risk, and Indemnity Agreement (“Agreement”) - Adult Participant

In consideration of participating in the _____

I represent that I understand the nature of this Activity and that I am qualified, in good health, and in proper physical condition to participate in such Activity. I acknowledge that if I believe event conditions are unsafe, I will immediately discontinue participation in the Activity.

I fully understand that this Activity involves risks of serious bodily injury, including permanent disability, paralysis and death, which may be caused by my own actions, or inactions, those of others participating in the event, the conditions in which the event takes place, or the negligence of the “releasees” named below; and that there may be other risks either not known to me or not readily foreseeable at this time; and I fully accept and assume all such risks and all responsibility for losses, costs, and damages I incur as a result of my participation in the Activity.

I hereby release, discharge, and covenant not to sue The Fellowship of Christian Athletes, its respective administrators, directors, agents, officers, volunteers, and employees, other participants, any sponsors, advertisers, and, if applicable, owners and lessors of premises on which the Activity takes place, (each considered one of the “RELEASEES” herein) from all liability, claims, demands, losses, or damages on my account caused or alleged to be caused in whole or in part by the negligence of the “releasees” or otherwise, including negligent rescue operations; and I further agree that if, despite this release, waiver of liability, and assumption of risk I, or anyone on my behalf, makes a claim against any of the Releasees, I will indemnify, save, and hold harmless each of the releasees from any loss, liability, damage, or cost which any may incur as the result of such claim.

I have read this RELEASE AND WAIVER OF LIABILITY, ASSUMPTION OF RISK, AND INDEMNITY AGREEMENT, understand that I have given up substantial rights by signing it and have signed it freely and without any inducement or assurance of any nature and intend it be a complete and unconditional release of all liability to the greatest extent allowed by law and agree that if any portion of this agreement is held to be invalid the balance, notwithstanding, shall continue in full force and effect.

Printed name of Participant

Date:

Signature of Participant



FORMS

Liability Insurance Coverage Certificate Request Form

Fellowship of Christian Athletes

Name of event: _____

Date(s) of event: _____

Approximate # of participants: _____

Location of event: _____

Brief description of activities: _____

Name, physical address and phone of Organization or Facility (church, school, etc., not the FCA Office) requesting to receive a Certificate of Liability:

Attention: _____

Phone number: _____

Fax number: _____

Email address: _____

Special instructions: _____

FCA Representative Responsible for Event: _____

Phone Number: _____

(Staff or Volunteer, if Volunteer, please include the name of your FCA Staff person as well)

Signed: _____ Date: _____

The original Certificate will be sent to the organization requesting proof of insurance. A copy of the certificate will be sent to the FCA Special Event Insurance Department. This completed form must be sent to FCA at least three weeks prior to the date of the event to:

Fellowship of Christian Athletes
Special Event Insurance Dept.
8701 Leeds Road, Kansas City, MO 64129
(800) 289-0909, (816) 923-2136 - fax

Exhibit B-58

**H U D D L E
P L A Y B O O K**



Funds Returned Contribution Transmittal

Number _____ Fellowship of Christian Athletes

Local Staff Contact _____ City _____ State _____

Huddle Ministry Name _____

Make Check to: FCA _____
(Huddle Name)

Send Check to: _____
(Name/Address of Treasurer)

We will mail your returned funds back to the treasurer for distribution, net of an administrative charge. We will send an electronic receipt to the donor.

Enclosed are Checks from:

Name of Donor	Donor Email	Amount
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		

Total of Checks \$ _____

Instructions:

Mail the original report and all checks to: Finance Department, c/o Receipting, Fellowship of Christian Athletes, 8701 Leeds Road, Kansas City, MO 64129. Mail a copy of the report to your local/state office. Keep one copy of this report for your records.

Signed _____ Date _____

*The funds will be returned, less an 11% administrative charge.

Exhibit B-59



FORMS

FCA Student Leader Application

Instructions: Please fill out this form and return to your Huddle Coach if you are interested in being considered as an FCA Leadership Team member this coming school year.

A. Personal Information

Date _____

School _____

Name _____ Current grade _____

Address _____

City _____ State _____ Zip _____

Phone (cell) _____ (home) _____

Email address _____

School sport(s)/other club activities _____

Parent's name(s) _____

Address _____

City _____ State _____ Zip _____

Parent's phone _____

B. Church Service

Current church you attend _____

Address _____

City _____ State _____ Zip _____

Are you a member? Yes No

In what area of church life do you now participate? _____

Pastor/Priest's name _____

C. FCA Experience

Briefly list your FCA involvement: _____

What office are you interested in? _____

Why would you like to be part of the FCA Leadership Team? _____

What is the purpose of FCA? _____

Are you a current FCA Teammate? Yes No

D. Spiritual Formation

(If you need more space, please continue on a separate sheet.)

Complete the following:

1. What do you think it means to be a Christian? _____

2. Explain when and how your walk with Christ began. _____

3. Have you come to the place in your own spiritual life where you know for certain that, if you died today, you would go to heaven? Yes No

4. If you were to die today and stand before God, and He asked you, "Why should I allow you into heaven?" what would you say? _____



FORMS

E. FCA Leadership Commitments

1. Statement of Faith

We believe the Bible to be the only inspired, trustworthy and true, without error, Word of God. (2 Timothy 3:16-17)

We believe there is only one God who eternally exists in three persons: Father, Son and Holy Spirit. (Matthew 28:19)

We believe Jesus Christ is God, in His virgin birth, in His sinless life, in His miracles, in His death that paid for our sin through His shed blood, in His bodily resurrection, in His ascension/rising up to the right hand of the Father and in His personal return in power and glory. (John 1:1; Matthew 1:18,25; Hebrews 4:15; Hebrews 9:15-22; 1 Corinthians 15:1-8; Acts 1:9-11; Hebrews 9:27-28)

We believe that acceptance of Jesus Christ and the corresponding renewal of the Holy Spirit are the only paths to salvation for lost/sinful men and women. (John 3:16; John 5:24; Titus 3:3-7)

We believe in the present ministry of the Holy Spirit, who lives within and guides Christians so they are enabled to live godly lives. (John 14:15-26; John 16:5-16; Ephesians 1:13-14)

We believe in eternal life, and that through belief in Jesus Christ as the Son of God, we spend eternity with the Lord in Heaven. We believe that in rejecting Jesus Christ as Lord and Savior, we receive eternal suffering in hell. (Matthew 25:31-46; 1 Thessalonians 4:13-18)

We believe in the spiritual unity of believers in our Lord Jesus Christ, that all believers are members of His body, the Church. (Philippians 2:1-4)

We believe God's design for sexual intimacy is to be expressed only within the context of marriage, that God created man and woman to complement and complete each other. God instituted marriage between one man and one woman as the foundation of the family and the basic structure of human society. For this reason, we believe that marriage is exclusively the union of one man and one woman. (Genesis 2:24; Matthew 19:5-6; Mark 10:6-9; Romans 1:26-27; 1 Corinthians 6:9)

We believe that God created all human beings in His image. Therefore, we believe that human life is sacred from conception to its natural end; that we must honor the physical and spiritual needs of all people; and by following Christ's example, we believe that every person should be treated with love, dignity and respect. (Psalm 139:13; Isaiah 49:1; Jeremiah 1:5; Matthew 22:37-39; Romans 12:20-21; Galatians 6:10)

I understand that as a leader in FCA my life is an example to others.

Yes No

2. Focus on the Gospel of Christ

FCA's ministry presents Jesus Christ as Lord and Savior. Speaking in tongues, healings, prophesying, and baptism are a part of the Christian experience for many people; however, FCA chooses not to focus on them but on the basics of the gospel of Christ.

Do you agree to keep the focus on the gospel of Christ and not on these or other denominational issues? Yes No

3. FCA's Student Leadership Statement

Just as "captains" are held to a higher standard for their team, FCA Student Leaders are held to a higher standard of biblical lifestyle and conduct. God desires all of His people, especially leaders, to pursue His standards of holiness through their conduct and obedience. Paul the Apostle instructed young Timothy to live similarly in 1 Timothy 4:12 (NLT): "Do not let anyone think less of you because you are young. Be an example to all believers in what you say, in the way you live, in your love, your faith, and your purity [chastity]."

FCA Student Leaders are not always perfect examples, but they do their best to live and conduct themselves in accordance with biblical values and instruction in order to glorify God. If there are questions about what God says regarding how we live our lives, FCA encourages student leaders to look to the Bible as their Playbook and speak to an FCA adult volunteer or staff member if there are further questions.

Will you conform to the FCA's Student Leadership Statement? Yes No



FORMS

4. FCA's Christian Character and Mission

To express and exercise FCA's Christian beliefs, all FCA representatives shall contribute to FCA's Christian character and mission. Accordingly, each FCA representative shall be expected to model FCA's Christian beliefs for the larger community, perform all of their duties as a service to God and comply with the following obligations.

Beliefs. Each FCA representatives shall affirm their agreement with FCA's Christian beliefs and shall not subscribe to or promote any religious beliefs inconsistent with these beliefs.

Christian Conduct Standards. FCA Representatives shall at all times (both during working and non-working hours) endeavor to conduct themselves in a manner that affirms biblical standards of conduct in accordance with FCA's Christian beliefs. Such conduct standards include FCA's Youth Protection Policy, and Student Leadership Statement.

Distinctly Christian Activities. Each FCA Representative shall be ready, willing and able to lead or contribute to distinctly Christian activities such as worship and prayer services.

Have you, or will you at this time commit to living a drug, alcohol and tobacco-free life? Yes No

Will you conform to the FCA's Christian Character and Mission?
 Yes No

Signature _____ Date _____

**H U D D L E
P L A Y B O O K**



4 X 9 Multi-Sport Huddle Planning Sheet

Share — Present Gospel:

- 1.
- 2.
- 3.
- 4.
- 5.

List Presenting Plans

Seek — Disciple Others:

- 1.
- 2.
- 3.
- 4.
- 5.

List Discipling Plans

Lead — Reach Out:

- 1.
- 2.
- 3.
- 4.
- 5.

List Reaching Plans

Love — Fellowship Together:

- 1.
- 2.
- 3.
- 4.
- 5.

List Fellowship Plans

Meeting Date	August: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

1.		
2.		
3.		
4.		
5.		

Meeting Date	September: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

1.		
2.		
3.		
4.		
5.		

Meeting Date	October: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

1.		
2.		
3.		
4.		
5.		

Meeting Date	November: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

1.		
2.		
3.		
4.		
5.		

Ministry Purpose = Share, Seek, Lead, Love
Target Group = Huddle Members; Athletic Community; Entire Campus



FORMS



4 X 9 Multi-Sport Huddle Planning Sheet

Share —Present Gospel :

- 1.
- 2.
- 3.
- 4.
- 5.

List Presenting Plans

Seek —Disciple Others :

- 1.
- 2.
- 3.
- 4.
- 5.

List Discipling Plans

Lead —Reach Out :

- 1.
- 2.
- 3.
- 4.
- 5.

List Reaching Plans

Love —Fellowship Together :

- 1.
- 2.
- 3.
- 4.
- 5.

List Fellowship Plans

Meeting Date	January: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

Meeting Date	February: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

Meeting Date	March: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

Meeting Date	April: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

Meeting Date	May: Ministry Purpose	Target Group
1.		
2.		
3.		
4.		
5.		

Ministry Purpose = Share, Seek, Lead, Love
 Target Group = Huddle Members; Athletic Community; Entire Campus

FORMS

Multi-Sport Huddle Meeting Agenda Form



- Meeting Date: _____
- Meeting Purpose: _____
(Share, Seek, Lead, Love)
- Target Group: _____
- **Welcome:** greetings and announcements

- **Warm-Up:** ice-breaker, games, skit

- **Workout:** Bible studies, devotionals, testimonials

- **Wrap-Up:** closing comments



RESOURCES

FCA Testimony Helps

A personal testimony is simply sharing what God has done in your life. One of the most effective ways to prepare your testimony is to ask three questions.

Example:

What my life was like before I met Christ?

I was raised in a Christian home and went to church. But I was always afraid of dying after I had two asthma attacks in the night that almost killed me.

How did I come to know Christ?

When I was twelve, I couldn't go to sleep one night because of my fear of dying in the night. I woke my mom up and she shared with me that if I am a Christian, I don't have to fear death because I can go to heaven. I prayed to receive Christ as my personal Lord and Savior that night.

What has my life been like since?

I no longer stay awake at night wondering where I will spend eternity. It will be in heaven because of Jesus Christ.

Now, you try it. Work through the questions below, write your testimony in your own words and practice sharing it. Yours might be long and exciting, or short and sweet. It is important to focus on what God has done, not on what you did wrong in the past. Feel free to use more paper if you need to, but remember, keeping things "simple" is always best when speaking to a group.

Developing Your Testimony

What was my life like before Christ?

How did I meet Christ?

How has my life been since accepting Christ?

Your Salvation Testimony should focus on:

- The key is to share your story. Tell your story how you came to know Him personally.
- Three key parts to every testimony: (1) before Christ, (2) how you came to Christ and (3) how you have grown in Christ.

Helpful Tips to Remember

1. Stay within your time frames. The following chart breaks down each segment of your testimony depending on the time you have been given.

Testimony Sequence

<u>Time Allowed</u>	<u>3-5 minutes</u>	<u>8-10 minutes</u>	<u>15-20 minutes</u>
Introduction	30 seconds	1 minute	2 minutes
Need for Christ	1 minute	2-3 minutes	4 minutes
How you came to know Christ	1 minute	2 minutes	4 minutes
Your "New Life" in Christ	1-2 minutes	2-3 minutes	3 minutes
Closing	30 seconds	1 minute	2 minutes

2. Refrain from using spiritual terminology, clichés or phrases with which the unchurched may not be familiar or cause them to be uncomfortable.
3. When using scripture references, be sure not to use too many, or simply make reference. Read the whole verse(s) that is appropriate, being cautious not to get caught in lengthy scripture readings. Share the main verse(s) that had the greatest impact in your life.
4. Be careful with particular denominational issues which could become tangents to the overall purpose of your message. Any negative comments about people, churches, denominations or issues can be counter productive.



RESOURCES

TEAM FCA



The Competitor's Creed

I am a Christian first and last.
I am created in the likeness of God Almighty to bring Him glory.
I am a member of Team Jesus Christ.
I wear the colors of the cross.

I am a Competitor now and forever.
I am made to strive, to strain, to stretch and to succeed in the arena of competition.
I am a Christian Competitor and as such, I face my challenger with the face of Christ.

I do not trust in myself.
I do not boast in my abilities or believe in my own strength.
I rely solely on the power of God.
I compete for the pleasure of my Heavenly Father, the honor of Christ and the reputation of the Holy Spirit.

My attitude on and off the field is above reproach - my conduct beyond criticism.
Whether I am preparing, practicing or playing:
I submit to God's authority and those He has put over me.
I respect my coaches, officials, teammates and competitors out of respect for the Lord.

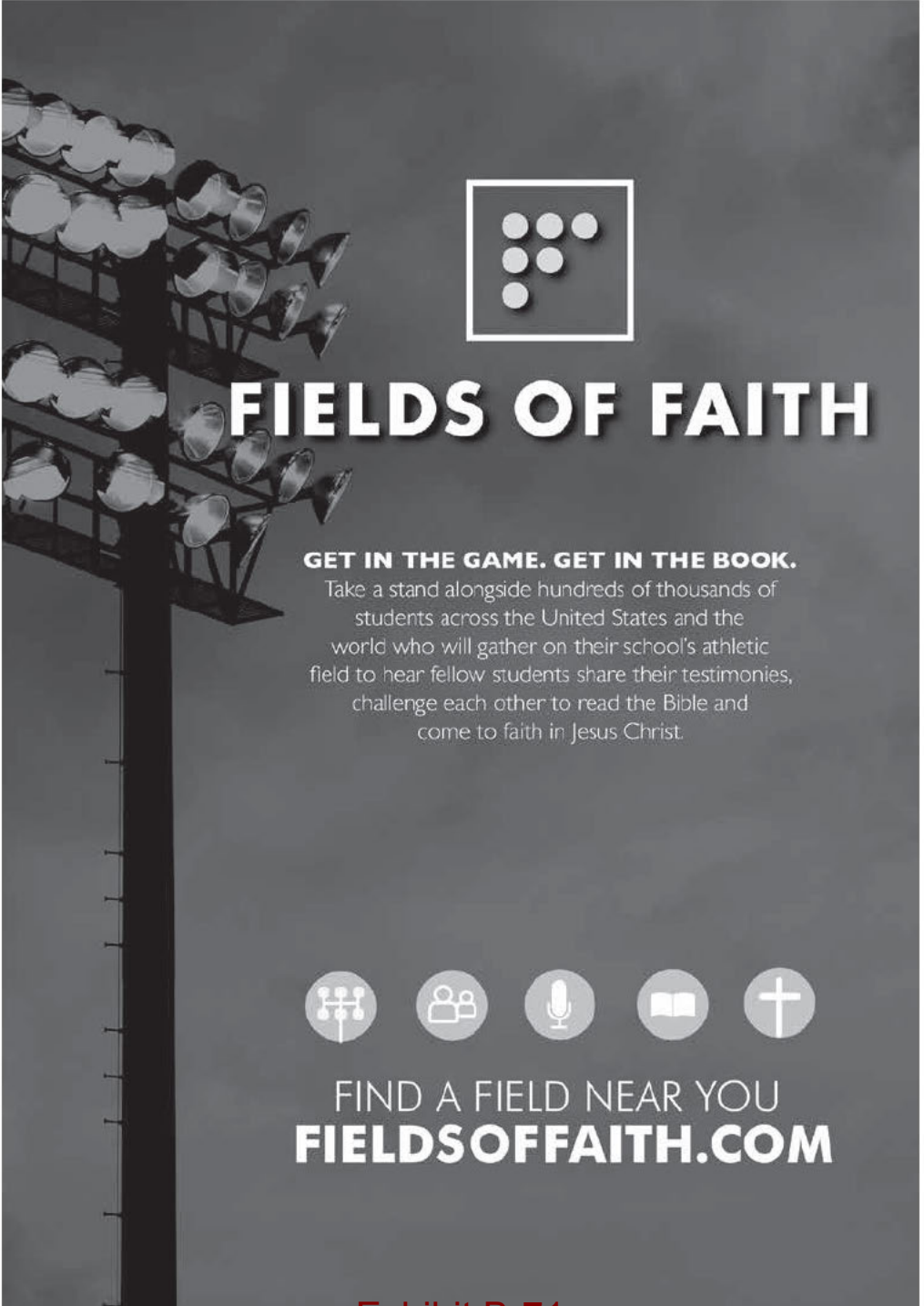
My body is the temple of Jesus Christ.
I protect it from within and without.
Nothing enters my body that does not honor the Living God.
My sweat is an offering to my Master. My soreness is a sacrifice to my Savior.

I give my all - all of the time.
I do not give up. I do not give in. I do not give out.
I am the Lord's warrior - a competitor by conviction and a disciple of determination.
I am confident beyond reason because my confidence lies in Christ.
The results of my efforts must result in His glory.

Let the competition begin.
Let the glory be God's.







COMPETITORS for CHRIST



FIELDS OF FAITH

GET IN THE GAME. GET IN THE BOOK.
Take a stand alongside hundreds of thousands of students across the United States and the world who will gather on their school's athletic field to hear fellow students share their testimonies, challenge each other to read the Bible and come to faith in Jesus Christ.

FIND A FIELD NEAR YOU
FIELDSOFFAITH.COM

Exhibit B-71



FELLOWSHIP OF CHRISTIAN ATHLETES

COACHES' Huddle

HUDDLE
PLAYBOOK

Exhibit B-72



FCA VISION:

TO SEE THE WORLD TRANSFORMED BY JESUS CHRIST
THROUGH THE INFLUENCE OF COACHES AND ATHLETES.



[FCARESOURCES.COM](https://fcaresources.com)
ALL FCA MINISTRY
RESOURCES ON ONE SITE



[FCACOACHESACADEMY.COM](https://fcacoachesacademy.com)
TRAINING PROCESS FOR COACHES



[FCAGEAR.COM](https://fcagear.com)
ONLINE MERCHANDISE STORE



[FCACAMPS.ORG](https://fcacamps.org)
FIND A CAMP. GO TO CAMP.

THE FELLOWSHIP OF CHRISTIAN ATHLETES

8701 Leeds Road • Kansas City, MO • 64129-1680

1-800-289-0909 • fca@fca.org

Exhibit B-73

EXHIBIT C



FCA Student Leader Application

Instructions: Please fill out this form and return to your Club Advisor and/or FCA Staff if you are interested in being considered as an FCA Leadership Team member this coming school year.

Personal Information

Date _____ School _____ T-Shirt Size _____ Graduation Year _____
 Name _____ Sport (you play or enjoy) _____
 Address _____
 City _____ State _____ Zip _____
 Phone (cell) _____
 Email _____
 School sport(s)/other club activities _____

Parent's name(s) _____
 Dad email _____ Mom email _____
 Dad cell phone _____ Mom cell phone _____

Church Involvement

Current church you attend _____
 How often? Regularly Sometimes Rarely I would like to find a Church/High School Youth Group
 Pastor/Priest's name _____

FCA Experience

Briefly list your FCA involvement:

What leadership position are you interested in?

Why would you like to be part of the FCA Leadership Team?

What is the purpose of FCA?

Are you a current FCA Teammate? Yes No (To join for free, visit fca.org)

FCA Leadership Commitments

Statement of Faith

FCA's Statement of Faith helps us keep Jesus Christ the center of our ministry with a clear understanding of what we believe. As a ministry, we focus on what we agree on, not what we disagree about. FCA does not deal with doctrinal differences like the gifts of the Spirit and baptism. This allows us to be inter-denominational while keeping Jesus Christ at the core of our ministry.

- We believe the Bible to be the only inspired, trustworthy and true, without error, Word of God. (2 Timothy 3:16-17)
- We believe there is only one God who eternally exists in three persons: Father, Son and Holy Spirit. (Matthew 28:19)
- We believe Jesus Christ is God, in His virgin birth, in His sinless life, in His miracles, in His death that paid for our sin through His shed blood, in His bodily resurrection, in His ascension/rising up to the right hand of the Father and in His personal return in power and glory. (John 1:1; Matthew 1:18,25; Hebrews 4:15; Hebrews 9:15-22; 1 Corinthians 15:1-8; Acts 1:9-11; Hebrews 9:27-28)
- We believe that acceptance of Jesus Christ and the corresponding renewal of the Holy Spirit are the only paths to salvation for lost/sinful men and women. (John 3:16; John 5:24; Titus 3:3-7)
- We believe in the present ministry of the Holy Spirit, who lives within and guides Christians so they are enabled to live godly lives. (John 14:15-26; John 16:5-16; Ephesians 1:13-14)
- We believe in eternal life, and that through belief in Jesus Christ as the Son of God, we spend eternity with the Lord in Heaven. We believe that in rejecting Jesus Christ as Lord and Savior, we receive eternal suffering in hell. (Matthew 25:31-46; 1 Thessalonians 4:13-18)

- We believe in the spiritual unity of believers in our Lord Jesus Christ, that all believers are members of His body, the Church. (Philippians 2:1-4)
- We believe God's design for sexual intimacy is to be expressed only within the context of marriage. God instituted marriage between one man and one woman as the foundation of the family and the basic structure of human society. For this reason, we believe that marriage is exclusively the union of one man and one woman. (Genesis 2:24; Matthew 19:5-6; Mark 10:6-9; Romans 1:26-27; 1 Corinthians 6:9)
- We believe that God created all human beings in His image. Therefore, we believe that human life is sacred from conception to its natural end; that we must honor the physical and spiritual needs of all people; following Christ's example, we believe that every person should be treated with love, dignity and respect. (Psalm 139:13; Isaiah 49:1; Jeremiah 1:5; Matthew 22:37-39; Romans 12:20-21; Galatians 6:10)

I understand that as a leader in FCA my life is an example to others . 1 Timothy 4:12 *"Don't let anyone look down on you because you are young, but set an example for the believers in speech, in life, in love, in faith and in purity."*

Do you agree with FCA's Statement of Faith? Yes No

Spiritual Formation

1. What do you think it means to be a Christian?

2. Share when you first believed in Jesus?

3. Have you come to the place in your own spiritual life where you know for certain that, if you died today, you would go to heaven? Unsure Yes No

4. If you were to die today and stand before God, and He asked you, "Why should I allow you into heaven?" what would you say?

Focus on the Gospel of Jesus Christ

FCA's ministry presents Jesus Christ as Lord and Savior. Speaking in tongues, healings, prophesying, and baptism are a part of the Christian experience for many people; however, FCA chooses not to focus on them but on the basics of the gospel of Jesus Christ.

Do you agree to keep the focus on the gospel of Christ and not on these or other denominational issues? Yes No

FCA Student Leadership Statement

Just as "captains" are held to a higher standard for their team, FCA Student Leaders are held to a higher standard of biblical lifestyle and conduct. God desires all of His people, especially leaders, to pursue His standards of holiness through their conduct and obedience. Paul the Apostle instructed young Timothy to live similarly in 1 Timothy 4:12. (NLT): "Do not let anyone think less of you because you are young. Be an example to all believers in what you say, in the way you live, in your love, your faith, and your purity."

FCA Student Leaders are not always perfect examples, but they do their best to live and conduct themselves in accordance with biblical values and instruction in order to glorify God. If there are questions about what God says regarding how we live, love, or live sexually pure lives, FCA encourages student leaders to look to the Bible as their Playbook and speak to a FCA Adult Volunteer or Staff member if there are further questions.

Will you conform to FCA's Student Leadership Statement? Yes No

FCA Christian Character and Mission

To express and exercise FCA's Christian beliefs, all FCA representatives shall contribute to FCA's Christian character and mission. Accordingly, each FCA representative shall be expected to model FCA's Christian beliefs for the larger community, perform all of their duties as a service to God and comply with the following obligations.

Beliefs. Each FCA representatives shall affirm their agreement with FCA's Christian beliefs and shall not subscribe to or promote any religious beliefs inconsistent with these beliefs.

Christian Conduct Standards. FCA Representatives shall at all times (both during working and non-working hours) endeavor to conduct themselves in a manner that affirms biblical standards of conduct in accordance with FCA's Christian beliefs. Such conduct standards include FCA's Youth Protection Policy and Sexual Purity Statement.

Distinctly Christian Activities. Each FCA Representative shall be ready, willing and able to participate and contribute to distinctly Christian activities such as worship and prayer services.

Have you, or will you at this time commit to living a drug, alcohol and tobacco-free life? Yes No

Will you conform to FCA's Christian Character and Mission? Yes No

Signature _____ Date _____

(Turn in to FCA Club Advisor/FCA Staff)

CIVIL COVER SHEET

The JS-CAND 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

John Doe on behalf of his minor daughter Jane Doe, Jessica Roe, and Fellowship of Christian Athletes

(b) County of Residence of First Listed Plaintiff United States (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Seto Wood & Schweickert LLP, 1470 Maria Lane, Suite 300, Walnut Creek, CA 94596 / 925-938-6100

DEFENDANTS

San Jose Unified School District Board of Education, Nancy Albarran, Herb Espiritu, Peter Glasser

County of Residence of First Listed Defendant United States (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, HABEAS CORPUS, OTHER, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation-Transfer
8 Multidistrict Litigation-Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

20 U.S.C. §§ 4071
Brief description of cause:
Equal Access Act

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, Fed. R. Civ. P. DEMAND \$ Per proof

CHECK YES only if demanded in complaint: JURY DEMAND: X Yes No

VIII. RELATED CASE(S), IF ANY (See instructions):

JUDGE DOCKET NUMBER

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)

(Place an "X" in One Box Only) SAN FRANCISCO/OAKLAND X SAN JOSE EUREKA-MCKINLEYVILLE

DATE April 22, 2020

SIGNATURE OF ATTORNEY OF RECORD

Christopher Schweickert

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS-CAND 44

Authority For Civil Cover Sheet. The JS-CAND 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the “defendant” is the location of the tract of land involved.)
- c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section “(see attachment).”
- II. Jurisdiction.** The basis of jurisdiction is set forth under Federal Rule of Civil Procedure 8(a), which requires that jurisdictions be shown in pleadings. Place an “X” in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- (1) United States plaintiff. Jurisdiction based on 28 USC §§ 1345 and 1348. Suits by agencies and officers of the United States are included here.
 - (2) United States defendant. When the plaintiff is suing the United States, its officers or agencies, place an “X” in this box.
 - (3) Federal question. This refers to suits under 28 USC § 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 - (4) Diversity of citizenship. This refers to suits under 28 USC § 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS-CAND 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an “X” in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an “X” in one of the six boxes.
- (1) Original Proceedings. Cases originating in the United States district courts.
 - (2) Removed from State Court. Proceedings initiated in state courts may be removed to the district courts under Title 28 USC § 1441. When the petition for removal is granted, check this box.
 - (3) Remanded from Appellate Court. Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 - (4) Reinstated or Reopened. Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 - (5) Transferred from Another District. For cases transferred under Title 28 USC § 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 - (6) Multidistrict Litigation Transfer. Check this box when a multidistrict case is transferred into the district under authority of Title 28 USC § 1407. When this box is checked, do not check (5) above.
 - (8) Multidistrict Litigation Direct File. Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket. Please note that there is no Origin Code 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC § 553. Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an “X” in this box if you are filing a class action under Federal Rule of Civil Procedure 23. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS-CAND 44 is used to identify related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- IX. Divisional Assignment.** If the Nature of Suit is under Property Rights or Prisoner Petitions or the matter is a Securities Class Action, leave this section blank. For all other cases, identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.”
- Date and Attorney Signature.** Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of California

JOHN DOE on behalf of his minor daughter JANE DOE, JESSICA ROE, and FELLOWSHIP OF CHRISTIAN ATHLETES, an Oklahoma corporation,

Plaintiff(s)

v.

SAN JOSE UNIFIED SCHOOL DISTRICT BOARD OF EDUCATION, in its official capacity, NANCY ALBARRÁN, in her official and personal capacity, HERB ESPIRITU, in his official and personal capacity, and PETER GLASSER, in his official and personal capacity.

Defendant(s)

Civil Action No. 5:20-cv-2798

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

SAN JOSE UNIFIED SCHOOL DISTRICT BOARD OF EDUCATION, in its official capacity, NANCY ALBARRÁN, in her official and personal capacity, HERB ESPIRITU, in his official and personal capacity, and PETER GLASSER, in his official and personal capacity
855 Lenzen Avenue
San Jose, CA 95126

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Stephen C. Seto (CA SBN 175458); Christopher J. Schweickert (CA SBN 225942)
SETO WOOD & SCHWEICKERT LLP
1470 Maria Lane, Suite 300, Walnut Creek, CA 94596
925-938-6100 tel / 925-262-2318 fax
sseto@wcjuris.com / cjs@wcjuris.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____
_____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

1 Reed N. Smith (VA BN 77334)
2 Kimberlee Wood Colby (DC BN 358024)
(seeking admission *pro hac vice*)
3 CENTER FOR LAW & RELIGIOUS FREEDOM
8001 Braddock Road, Ste. 302
4 Springfield, VA 22151
703-894-1011 tel / 703-642-1075 fax
5 rsmith@clsnet.org / kcolby@clsnet.org

6 Stephen C. Seto (CA SBN 175458)
7 Steven N.H. Wood (CA SBN 161291)
Christopher J. Schweickert (CA SBN 225942)
8 SETO WOOD & SCHWEICKERT LLP
1470 Maria Lane, Suite 300
9 Walnut Creek, CA 94596
10 925-938-6100 tel / 925-262-2318 fax
sseto@wcjuris.com / cjs@wcjuris.com

11 *Attorneys for Plaintiffs*

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

14
15 JOHN DOE on behalf of his minor
daughter, JANE DOE, JESSICA ROE,
16 and FELLOWSHIP OF CHRISTIAN
ATHLETES, an Oklahoma corporation,

17
18 Plaintiffs,

19 vs.

20 SAN JOSE UNIFIED SCHOOL
DISTRICT BOARD OF EDUCATION,
21 in its official capacity, NANCY
ALBARRÁN, in her official and
22 personal capacity, HERB ESPIRITU, in
his official and personal capacity, and
23 PETER GLASSER, in his official and
24 personal capacity.

25 Defendants.
26

CASE NO. 5:20-cv-2798

JUDGE:

**APPLICATION FOR LEAVE TO
PROCEED USING PSEUDONYMS
AND FOR PROTECTIVE ORDER**

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1 NOW come the Plaintiffs, John Doe on behalf of his minor daughter Jane Doe;
2 and Jessica Roe, and Fellowship of Christian Athletes (“FCA”) by and through their
3 attorneys, and file this Motion for Leave to Proceed Using Pseudonyms and For
4 Protective Order (“Motion for Leave”) and show the following in support:

5 1. This case involves allegations by the Plaintiffs that Defendants have
6 violated the Equal Access Act and the constitutional rights of the Plaintiffs. Plaintiffs
7 further allege that Roe and Doe, and other student participants in student chapters of
8 FCA (“Student FCA Chapters”) have been targeted by administrators, faculty, and
9 students in the San Jose Unified School District due to their religious beliefs.
10 Plaintiffs have brought claims under 42 U.S.C. § 1983.

11 2. Plaintiffs request permission to proceed pseudonymously based upon the
12 nature of the claims in this case, the fact that a minor plaintiff is involved, and the
13 Plaintiffs’ reasonable concerns, based on harassment and discrimination already
14 suffered by Roe and Doe, that Plaintiffs will be the victims of retaliation, harassment,
15 injury in the community, and other serious harm if their identities are known to the
16 public.

17 3. In the Ninth Circuit, the factors that a court should consider when a party
18 seeks to proceed under a pseudonym include (1) the severity of the threatened harm;
19 (2) the reasonableness of the anonymous party’s fears; (3) the anonymous party’s
20 vulnerability to such retaliation; (4) the precise prejudice at each stage of the
21 proceedings to the opposing party, and whether the proceedings may be structured
22 so as to mitigate that prejudice; and (5) whether the public interest would be best
23 served by requiring that the litigants reveal their identities. *See Does I thru XXIII v.*
24 *Advanced Textile Corp.*, 214 F.3d. 1058, 1068 (9th Cir. 2000). The Court should
25 also consider the threats posed by parties not before it. *Id.* at 1069.
26
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1 4. The first two factors are deemed the most important and are generally
2 considered together Doe and Roe have a reasonable fear that public disclosure of
3 their identity will lead to severe harm.

4 5. As detailed in the Complaint, Roe and Doe have been the subject of a
5 campaign of harassment and intimidation due to their religious beliefs. Regarding
6 the threat to Roe and Doe. Mr. Glasser, one of the defendants in this matter,
7 acknowledged that his actions may have “violated the sense of humanity and safety”
8 of FCA students at Pioneer.

9 6. During the past year, Roe and Doe have been subject to harassment, not
10 only by students, but by faculty. As discussed in the Complaint, on December 4,
11 2019, students who were jeering and yelling at students in FCA tried to enter into
12 the Pioneer Student Chapter meeting. This attempt to enter the FCA meeting was
13 reported in the school newspaper.

14 7. Additionally, both Roe and Doe are particularly vulnerable due to their
15 age. Doe is a minor, Roe, though no longer a minor, is still in high school.

16 8. Further, this case involves the religious beliefs of the two individual
17 plaintiffs. As courts have noted, religious beliefs are “quintessentially private”
18 matters. *Doe v. Pittsylvania County, Va.*, 844 F. Supp.2d 724, 729 (W.D. Va. 2012)
19 (citing *Doe v. Stegall*, 653 F.2d XX, 186 (5th Cir. 1981).

20 9. Plaintiffs are also vulnerable to retaliation. Plaintiffs are still students in
21 the San Jose Unified School District. This opens them up to retaliation from
22 Defendants. As outlined in the complaint, the District has already threatened to
23 punish Roe and Doe when they complained about being harassed by representatives
24 of the school newspaper. The District informed students that to prevent future
25 harassment by keeping the newspaper representatives out of the classroom, the
26 students would have to forfeit having their individual pictures in the school
27 yearbook.
28

1 10. Requiring Roe and Doe to proceed without the protection of proceeding
2 pseudonymously is against the public interest because it will discourage future
3 students who seek to protect their constitutional rights from going forward, at the
4 risk of retaliation from their peers and their teachers.

5 11. Plaintiffs are willing to provide information to Defendants in order to
6 prosecute the case and not prejudice them in their defense. However, such
7 disclosures should be subject to a protective order to prevent wide dissemination of
8 Plaintiffs' identities.

9 12. Plaintiffs will provide the Court with a protective order that protects the
10 interest of Roe and Doe without prejudicing the ability of Defendants to defend
11 themselves of these accusations.

12 13. Because Roe and Doe reasonably fear severe harm in the form of
13 increased harassment from fellow students and faculty and are vulnerable to such
14 harm, the Court should grant them the right to proceed pseudonymously. This is
15 particularly so given that special factors of age and religion are at issue in this case.
16 Moreover, the public interest would be harmed if Roe and Doe were required to
17 reveal themselves. Future litigants in similar positions would be discouraged from
18 seeking to protect their rights in court at the risk of being outed and subject to
19 retaliation.

20 14. There is no prejudice to Defendants because Plaintiffs are willing to offer
21 necessary information to allow Defendants to pursue their defense subject to a
22 protective order in this case.

23 15. Because all of the relevant factors and additional considerations favor
24 allowing Roe and Doe to proceed with the use of pseudonyms, Plaintiffs ask that
25 this application be granted.
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Respectfully Submitted,

Dated: April 22, 2020

CENTER FOR LAW & RELIGIOUS
FREEDOM

By: _____ /s/ Reed N. Smith
Reed N. Smith (VA SBN 77334)
Kimberlee Wood Colby (DC BN 358024)
(seeking admission *pro hac vice*)
8001 Braddock Rd., Ste. 302
703-642-1101 tel / 703-642-1075 fax
rsmith@clsnet.org / kcolby@clsnet.org

SETO WOOD & SCHWEICKERT LLP

By: _____ /s/
Stephen C. Seto (CA SBN 175458)
Steven N.H. Wood (CA SBN 161291)
Christopher J. Schweickert (CA SBN 225942)
1470 Maria Lane, Suite 300
Walnut Creek, CA 94596
925-938-6100 tel / 925-262-2318 fax
sseto@wcjuris.com / cjs@wcjuris.com

Attorneys for Plaintiffs
John Doe, on behalf of his minor daughter,
Jane Doe, Jessica Roe, and Fellowship of
Christian Athletes