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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

SUMMIT CHRISTIAN ACADEMY and
YOUNG AMERICANS FOR FREEDOM
CLUB,

Plaintiffs,

v.

MICHAEL MEOTTI, in his official capacity as
executive director of the Washington Student
Achievement Council, and BECKY
THOMPSON, in her official capacity as
director of the Office of Student Financial
Assistance,

Defendants.

No. 3:18-cv-05656-TLF

**PLAINTIFFS' FIRST AMENDED
CIVIL RIGHTS COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF**

INTRODUCTION

1. This case is a federal constitutional challenge to the exclusion of so-called “sectarian” options from Washington’s State Work-Study Program: a financial-aid program designed to help post-secondary students earn money for college and gain real-world work experience. Under the program, students may work for the government, for-profit corporations, or non-profit organizations, but they may not work for employers or in jobs that the State deems

1 “sectarian.” This prohibition on sectarian options violates the Free Exercise, Equal Protection,
2 and Establishment Clauses of the U.S. Constitution.

3 **PARTIES, JURISDICTION, AND VENUE**

4 2. Plaintiff Summit Christian Academy is a private, non-profit kindergarten-
5 through-12th-grade school located in Spokane, Washington. It is approved by Washington’s
6 Office of Superintendent of Public Instruction and accredited by AdvancED, a non-profit
7 accrediting organization for religious and non-religious schools alike. Summit Christian
8 Academy was previously incorporated as “Northwest Christian Education” but filed
9 amendments with the Washington Secretary of State to change its name to Summit Christian
10 Academy in January 2018. All references in this complaint, whether before or after that change,
11 are to “Summit Christian Academy.”

12 3. Plaintiff Young Americans for Freedom Club (hereinafter “YAFC”) is a
13 chartered club at Whitworth University in Spokane, Washington, and a chapter of Young
14 Americans for Freedom: a national, non-profit youth activism organization. YAFC advocates
15 for limited government and individual freedom, including religious freedom. It has members
16 who are eligible for the State Work-Study Program and who desire the option to work for
17 “sectarian” employers, or to perform “sectarian related” work, under the program.

18 4. Defendant Michael Meotti is the executive director of the Washington Student
19 Achievement Council (hereinafter “WSAC”). WSAC is an agency of the State of Washington,
20 created and empowered under Title 28B, Chapter 77, of the Revised Code of Washington, and
21 headquartered in Olympia, Thurston County, Washington. Powers, duties, and functions that
22 previously rested in Washington’s Higher Education Coordinating Board, including the power

1 and duty to administer the State Work-Study Program, now rest in WSAC. As executive
2 director of WSAC, Mr. Meotti has the responsibility and practical ability to ensure that the State
3 Work-Study Program, including the regulations, policies, and practices concerning the Program,
4 are implemented and administered in accordance with the U.S. Constitution. Director Meotti is
5 sued in his official capacity only.

6 5. Defendant Becky Thompson is the director of the Office of Student Financial
7 Assistance, an office within and under the direction of the WSAC that is charged with
8 administering state financial aid programs, including the State Work-Study Program. As
9 director of the Office of Student Financial Assistance, Ms. Thompson has the responsibility and
10 practical ability to ensure that the State Work-Study Program, including the regulations,
11 policies, and practices concerning the program, are implemented and administered in accordance
12 with the U.S. Constitution. Ms. Thompson is sued in her official capacity only.

13 6. Plaintiffs' action, filed pursuant to 42 U.S.C. § 1983, as well as 28 U.S.C. §§
14 2201(a) and 2202, seeks a declaration that the State Work-Study Program's exclusion of
15 "sectarian" options is unconstitutional on its face and as applied, as well as an injunction
16 enjoining the exclusion's enforcement. Under 28 U.S.C. §§ 1331 and 1343(a)(3), this Court
17 possesses jurisdiction over the action.

18 7. Pursuant to 28 U.S.C. § 1391(b)(1) and (2), venue is proper in this judicial
19 district because the Defendants reside within it and a substantial part of the events giving rise to
20 Plaintiffs' claims occurred within it.

21 8. Pursuant to Local Civil Rule 3(e), assignment is proper in the Tacoma division
22 because the Defendants have their principal place of business in Thurston County and Plaintiffs'

1 claims arose within Thurston County.

2 **STATEMENT OF FACTS**

3 **THE STATE WORK-STUDY PROGRAM**

4 9. The State Work-Study Program is a post-secondary financial aid program
5 through which the State of Washington pays a portion of a student’s wages for work with a
6 participating employer, usually in a field related to the student’s major or course of graduate
7 study.

8 10. The State Work-Study Program’s primary purpose is “to provide financial
9 assistance to needy students, including needy students from middle-income families, attending
10 eligible post-secondary institutions in the state of Washington by stimulating and promoting
11 their employment, thereby enabling them to pursue courses of study at such institutions.” Wash.
12 Rev. Code § 28B.12.020.

13 11. “An additional purpose of th[e] program [is] to provide such needy students,
14 wherever possible, with employment related to their academic or vocational pursuits.” Wash.
15 Rev. Code § 28B.12.020.

16 12. By paying a portion of student wages, the State Work-Study Program provides an
17 incentive for employers to hire work-study students, thereby enabling students to gain valuable
18 job experience while earning money to meet the cost of college and defray reliance on student
19 loans.

20 13. The State Work-Study Program is valuable in other ways, as well. For example,
21 “[s]tudents may receive academic credit for experience gained through state work-study
22 employment.” Wash. Admin. Code § 250-40-050(6). Moreover, according to WSAC, nearly

1 one in five State Work-Study Program positions leads to a permanent job after graduation.

2 **MECHANICS OF THE STATE WORK-STUDY PROGRAM**

3 14. By May 1 of each year, WSAC establishes, for the upcoming academic year, a
4 reserve of funds for the student body at each college or university participating in the State
5 Work-Study Program. *See* Wash. Admin. Code § 250-40-060(2).

6 15. These funds, in turn, are used to reimburse participating employers, who pay
7 students out-of-pocket, then submit student timesheets to obtain reimbursement.

8 16. Public colleges and universities administer reimbursements themselves, while
9 reimbursements for students at private institutions are handled by WSAC.

10 17. Reimbursement is set at a rate between 40 and 70 percent, with 70 percent
11 available when a student works for: a public school district; a nonprofit community service
12 provider; or a business whose primary business activity is in the fields of science, technology,
13 engineering, and/or mathematics.

14 18. The State Work-Study Program is a program of genuine private choice. Eligible
15 students choose whether to participate and, if they do opt to participate, choose the employers
16 for which they will work. No public funds reach any participating employer but for the genuine
17 and independent choices of private individuals.

18 19. After being notified of eligibility for the State Work-Study Program as part of her
19 financial aid award, the eligible student may search for a job. This can involve browsing a
20 school-maintained list of job postings from employers that have already been approved to
21 participate in the program. Alternatively, the student may approach a non-participating
22 employer and ask whether it would be willing to apply to participate and hire her.

1 employers are excluded—WSAC requires the prospective employer to complete an “Employer
2 Business Profile.” It asks, “Does your organization . . . have a religious affiliation?”

3 26. If the prospective employer answers “Yes,” it must complete another form, a
4 “Religious Affiliation Questionnaire,” which consists of ten questions:

- 5 • “What is the nature and purpose of the business/organization?”
- 6 • “Is the work performed free from sectarian interest? If not, explain.”
- 7 • “What is the legal ownership of the business/organization?”
- 8 • “What are the primary sources for funding of the business/organization?”
- 9 • “What is the flow of money? (For example: *from* the parent business/organization
10 **or to** the parent business/organization?)”
- 11 • “Who are the members of the Board of Directors, and is their selection or
12 appointment conditioned by religious creed or commitment?”
- 13 • “Is there any sponsorship by a religious body, or is there a direct association with
14 a controlling sectarian organization? If yes, explain.”
- 15 • “Where is the business/organization housed? If housed in a church, what amount
16 of rent is paid each month?”
- 17 • “Is a person’s faith considered before they are approved to receive services? If
18 yes, explain.”
- 19 • “Is a person’s faith considered before they are employed? If yes, explain.”

20 27. The prospective employer may also be requested to provide a copy of its articles
21 of incorporation and bylaws with the completed questionnaire.

22 28. A WSAC staff member then reviews the materials to determine whether the

1 prospective employer is “sectarian” and, thus, ineligible to participate in the program.

2 29. In determining whether a prospective employer is “sectarian,” the WSAC staff
3 member reviewing the materials completes a matrix titled, “State Work Study Eligibility
4 Determination for Religiously Affiliated Organizations.” The matrix contains the following 11
5 questions:

- 6 • “Is the purpose of the organization primarily sectarian in nature?”
- 7 • “Does the organization have a direct association with a controlling sectarian
8 organization?”
- 9 • “Are funds received from or provided to a controlling sectarian organization?”
- 10 • “Is the organization’s operations [*sic*] primary funding by a controlling sectarian
11 organization?”
- 12 • “Does the organization receive funding from any government sources?”
- 13 • “Are any of the organization[’s] facilities owned by a controlling sectarian
14 organization?”
- 15 • “Is membership on the board of directors conditioned on an individual’s faith?”
- 16 • “Is the work performed by the organization free of sectarian interest?”
- 17 • “Are services provided to the public free of sectarian interests?”
- 18 • “Are the services provided to the public conditioned on [an] individual’s religious
19 faith?”
- 20 • “Is employment within the organization conditioned on an individual’s religious
21 faith?”

22 30. The WSAC staff member, presumably based on her review and interpretation of

1 the materials submitted by the prospective employer, checks “Yes” or “No” after each question.

2 31. According to instructions on the matrix, the answer to some of these questions
3 can be dispositive as to a prospective employer’s “sectarian” status and, thus, ineligibility for
4 participation in the State Work-Study Program. For example, if an employer receives a “No”
5 answer to the question “Is the work performed by the organization free of sectarian interest?,”
6 the matrix provides that “the employer is ineligible.” For other questions, the answer may be a
7 “positive” or “negative” “factor” or “indicator” for the prospective employer’s eligibility.

8 32. According to instructions on the matrix, “If the preponderance of evidences [*sic*]
9 doesn’t clearly indicate whether the organization is eligible or not, the evaluation should be
10 informed by additional review by any of the following: SFA Division Director, WSAC senior
11 management, AAG’s Office, or SFA workgroup.” “SFA” stands for “Student Financial
12 Assistance”; “AAG” stands for “Assistant Attorney General.”

13 33. WSAC’s Program Manual provides examples of ineligible employers. They
14 include “church sponsored daycare centers or educational institutions” and, at least in certain
15 circumstances, “religiously affiliated hospitals.”

16 34. If the prospective employer is deemed eligible to participate, it must then execute
17 an “Employer Contract” with either WSAC or a public college or university acting as WSAC’s
18 agent.

19 35. By signing the contract, the employer certifies that: (1) it “is a non-profit
20 organization or a profit-making business entity which does not have a direct association with a
21 controlling sectarian organization”; and (2) and will “[e]mploy students to perform only work
22 which will not . . . [b]e sectarian-related.”

1 36. The reason for the “sectarian” exclusion—that is, the exclusion of “sectarian”
2 employers and “sectarian related” work from the State Work-Study Program—is, according to
3 WSAC, the Washington Constitution. According to WSAC’s *Work Study Program Employer*
4 *Handbook*, “the state constitution prevents any business or organization involved in or with a
5 controlling interest in . . . religious activity from participating in the program.”

6 37. Many fields of work are traditionally occupied by religious employers, including
7 education (*e.g.*, diocesan schools), social services (*e.g.*, church-run soup kitchens), and medicine
8 (*e.g.*, hospitals owned and operated by religious orders). The “sectarian” exclusion restricts the
9 opportunities available to work-study students who wish to work in such fields.

10 38. In sum, under the State Work-Study Program, a student may work for the
11 government, a non-sectarian non-profit organization, or an international for-profit corporation
12 (even in one of its international offices), but she may not feed the homeless at a church’s soup
13 kitchen or tutor a child at a church-run school.

14 **THE “SECTARIAN” EXCLUSION’S IMPACT ON PLAINTIFFS**

15 ***Summit Christian Academy***

16 39. In August 2015, Plaintiff Summit Christian Academy applied to participate in the
17 State Work-Study Program as an employer after a student from Spokane Community College
18 expressed a desire to work as a tutor at Summit Christian during the 2015-16 school year.

19 40. Representatives of Summit Christian Academy and Spokane Community
20 College—which, as a public college, can enter into contracts with State Work-Study Program
21 employers—executed an Employer Contract on August 11, 2015. Spokane Community College
22 did not request a Religious Affiliation Questionnaire from Summit Christian Academy. As it

1 later explained in an email to WSAC, “We were not aware that was necessary (the employer is
2 religiously affiliated, but we were told that the job itself would be as a Math Tutor, and would in
3 no way promote religion).”

4 41. On August 17, 2015, however, after having been forwarded a copy of the
5 contract, WSAC requested that Summit Christian Academy complete a Religious Affiliation
6 Questionnaire and provide copies of its articles of incorporation and bylaws.

7 42. The same day, Summit Christian Academy completed the Religious Affiliation
8 Questionnaire. It forwarded the questionnaire, along with supporting documentation, to WSAC.

9 43. On August 27, 2015, a WSAC staff member, Marlena Rae Robbins, reviewed the
10 materials and completed the “State Work Study Eligibility Determination for Religiously
11 Affiliated Organizations” matrix described in paragraph 29, above. For each of the questions
12 the answer to which can be dispositive as to a prospective employer’s “sectarian” status, Ms.
13 Robbins checked the answer that would render Summit Christian Academy ineligible for the
14 State Work-Study Program. Based on her assessment, Ms. Robbins concluded that Summit
15 Christian Academy was, in fact, ineligible for the program.

16 44. Another WSAC staff member, Jeffrey N. Powell, conducted a “secondary
17 review” the same day and likewise concluded that Summit Christian Academy was not eligible
18 for the State Work-Study Program.

19 45. On August 28, 2015, WSAC’s Program Coordinator for the State Work-Study
20 Program, Jaclyn Molloy, sent emails to Summit Christian Academy and Spokane Community
21 College stating, “[W]e have determined that they [Summit Christian Academy] are not eligible
22 for the State Work Study (SWS) Program. We find the organization religiously affiliated, which

1 makes them an ineligible employer for the program”

2 46. The August 28, 2015 letter also provided an illustrative “list of ineligible
3 employers” from WSAC’s program manual. The list included “[a]ny church or entity which has
4 a direct association with a controlling sectarian organization (i.e. church sponsored day-care or
5 educational institutions).”

6 47. Because of its religious affiliation, Summit Christian Academy was denied the
7 ability to serve as a State Work-Study Program employer for a postsecondary student whose
8 private and independent choice was to work for the school.

9 48. Because of its religious affiliation, Summit Christian Academy was denied the
10 opportunity to provide mentorship and training that “nonsectarian” employers are permitted to
11 provide.

12 49. Summit Christian Academy continues to desire to participate as a State Work-
13 Study Program employer—for example, to employ students as tutors or in information
14 technology (IT) positions. Because of the program’s “sectarian” exclusion, however, the school
15 remains ineligible.

16 *Young Americans for Freedom Club*

17 50. YAFC is a recognized student club at Whitworth University, a private liberal arts
18 institution.

19 51. A primary institutional purpose of YAFC is to advocate for individual freedom,
20 including the religious freedom of its own members and other students at Whitworth University.

21 52. YAFC has members who are eligible for the State Work-Study Program and who
22 desire the opportunity to choose “sectarian” options under it. Because of the “sectarian”

1 exclusion in the State Work-Study Program, however, they are precluded from doing so.

2 53. The “sectarian” exclusion in the State Work-Study Program restricts, based on
3 religion, the employers that YAFC members and other Whitworth students may choose to work
4 for under the program.

5 54. The “sectarian” exclusion in the State Work-Study Program restricts, based on
6 religion, the types of work that YAFC members and other Whitworth students may choose to
7 perform under the program.

8 55. For example, YAFC members and other Whitworth students cannot undertake
9 State Work-Study employment for Whitworth University itself, because the university is an
10 evangelical, Presbyterian institution.

11 56. Instead, YAFC members and other Whitworth students must travel off campus to
12 pursue State Work-Study employment. Students attending non-sectarian private colleges and
13 universities, by contrast, are free to undertake State Work-Study employment for their own
14 colleges and universities.

15 57. Even off campus, YAFC members and other Whitworth students may only
16 undertake employment for “nonsectarian” employers, and may only perform work that is not
17 “sectarian related,” under the State Work-Study Program.

18 58. The “sectarian” exclusion in the State Work-Study Program is particularly
19 harmful to YAFC members and other Whitworth students majoring in fields that are
20 traditionally occupied by religious employers, such as education, social services, and medicine,
21 and who wish to perform the types of work that such employers perform.

22 59. The “sectarian” exclusion in the State Work-Study Program is also harmful to

1 YAFC members and other Whitworth students who simply desire the freedom to pursue State
2 Work-Study employment with organizations affiliated with their own faith.

3 60. The “sectarian” exclusion in the State Work-Study Program abridges the
4 religious freedom of YAFC members and other Whitworth students by forcing them to choose
5 between receipt of an otherwise-available public benefit and their right to obtain work
6 experience with a “sectarian” employer or through “sectarian related” work.

7 **CONSTITUTIONAL VIOLATIONS**

8 **CLAIM I: FREE EXERCISE CLAUSE**

9 61. By this reference, Plaintiffs incorporate each and every allegation set forth in
10 paragraphs 1 through 60 of this Complaint as though fully set forth herein.

11 62. The Free Exercise Clause of the First Amendment to the U.S. Constitution
12 provides, “Congress shall make no law . . . prohibiting the free exercise” of religion.

13 63. The Free Exercise Clause applies to states and their subdivisions and
14 municipalities through the Fourteenth Amendment to the U.S. Constitution.

15 64. The Free Exercise Clause protects against governmental hostility toward religion
16 and requires neutrality toward religion.

17 65. Wash. Admin. Code §§ 250-40-030(6) and 250-40-050(8) are not neutral with
18 respect to religion and are not laws of general applicability. Rather, they discriminate against
19 religion on their face, in that they prohibit private “sectarian” options in the State Work-Study
20 Program while allowing private “nonsectarian” options.

21 66. On their face and as applied to Summit Christian Academy, Wash. Admin. Code
22 §§ 250-40-030(6) and 250-40-050(8) require “sectarian” employers to forgo either the ability to

1 participate in the State Work-Study Program or their right to be “sectarian” and perform
2 “sectarian related” work.

3 67. On their face and as applied to members of YAFC, Wash. Admin. Code §§ 250-
4 40-530(6) and 250-40-050(8) require students to forgo either the receipt of an otherwise
5 generally available public benefit or their right to pursue employment with a “sectarian”
6 employer or perform “sectarian related” work.

7 68. On their face and as applied to Plaintiffs, Wash. Admin. Code §§ 250-40-030(6)
8 and 250-40-050(8) discriminate and impose special disabilities based on the religious status of:
9 (a) the employers they bar from participating in the State Work-Study Program; and (b) the
10 students whose religious beliefs motivate them to work for such employers.

11 69. On their face and as applied to Plaintiffs, Wash. Admin. Code §§ 250-40-030(6)
12 and 250-40-050(8) substantially burden the free exercise rights of students whose conviction is
13 to work for a “sectarian” employer or perform “sectarian related” work, as well as the free
14 exercise rights of the “sectarian” employers who are otherwise willing to provide employment
15 opportunities to such students.

16 70. Defendants have no compelling, substantial, or even legitimate interest in
17 denying private “sectarian” options in the State Work-Study Program while allowing private
18 “nonsectarian” options.

19 71. Wash. Admin. Code §§ 250-40-030(6) and 250-40-050(8) are not narrowly
20 tailored to achieve, nor are they rationally related to, any governmental interest Defendants
21 purport to have.

22 72. On their face and as applied to Plaintiffs, Wash. Admin. Code §§ 250-40-030(6)

1 and 250-40-050(8) violate the Free Exercise Clause of the First Amendment to the U.S.
2 Constitution insofar as they exclude “sectarian” options from the State Work-Study Program.

3 **CLAIM II: EQUAL PROTECTION CLAUSE**

4 73. By this reference, Plaintiffs incorporate each and every allegation set forth in
5 paragraphs 1 through 72 of this Complaint as though fully set forth herein.

6 74. The Equal Protection Clause of the Fourteenth Amendment to the U.S.
7 Constitution provides, “No State shall . . . deny to any person within its jurisdiction the equal
8 protection of the laws.”

9 75. The Equal Protection Clause prohibits government from discriminating on the
10 basis of religion, which is a suspect classification for equal protection purposes.

11 76. By denying private “sectarian” options in the State Work-Study Program while
12 allowing private “nonsectarian” options, Wash. Admin. Code §§ 250-40-030(6) and 250-40-
13 050(8) discriminate, facially and as applied to members of YAFC and Summit Christian
14 Academy, on the basis of religion.

15 77. Defendants have no compelling, substantial, or even legitimate interest in
16 denying private “sectarian” options in the State Work-Study Program while allowing private
17 “nonsectarian” options.

18 78. Wash. Admin. Code §§ 250-40-030(6) and 250-40-050(8) are not narrowly
19 tailored to achieve, nor are they rationally related to, any governmental interest Defendants
20 purport to have.

1 79. By excluding private “sectarian” options from the State Work-Study Program,
2 Wash. Admin. Code §§ 250-40-030(6) and 250-40-050(8) make it more difficult for one group
3 of students than for all others to seek aid from the government.

4 80. The Establishment Clause of the U.S. Constitution does not prohibit “sectarian”
5 options in the State Work-Study Program.

6 81. A desire to achieve greater separation of church and state than is already ensured
7 under the Establishment Clause of the U.S. Constitution cannot justify the exclusion of
8 “sectarian” options from the State Work-Study Program.

9 82. Because the Establishment Clause does not prohibit “sectarian” options in the
10 State Work-Study Program, and because a desire to achieve greater separation of church and
11 state than is already ensured under the Establishment Clause cannot justify the exclusion of
12 “sectarian” options from the State Work-Study Program, the exclusion of such options is
13 inexplicable by anything other than animus against “sectarian” employers or students who
14 would pursue employment with such employers.

15 83. On their face and as applied to Plaintiffs, Wash. Admin. Code §§ 250-40-030(6)
16 and 250-40-050(8) discriminate on the basis of religion and therefore violate the Equal
17 Protection Clause of the Fourteenth Amendment to the U.S. Constitution insofar as they exclude
18 “sectarian” options from the State Work-Study Program.

19 **CLAIM III: ESTABLISHMENT CLAUSE**

20 84. By this reference, Plaintiffs incorporate each and every allegation set forth in
21 paragraphs 1 through 83 of this Complaint as though fully set forth herein.

22 85. The Establishment Clause of the First Amendment to the U.S. Constitution

1 provides, “Congress shall make no law respecting an establishment of religion.”

2 86. The Establishment Clause applies to states through the Fourteenth Amendment to
3 the U.S. Constitution.

4 87. The Establishment Clause requires neutrality toward religion. Accordingly,
5 government may neither favor, nor disfavor, religion over non-religion.

6 88. By denying private “sectarian” options in the State Work-Study Program while
7 allowing private “nonsectarian” options, Wash. Admin. Code §§ 250-40-030(6) and 250-40-
8 050(8) are, facially and as applied to members of YAFC and Summit Christian Academy,
9 hostile toward and disapproving of religion.

10 89. Defendants do not have a secular governmental purpose for denying private
11 “sectarian” options in the State Work-Study Program while allowing private “nonsectarian”
12 options.

13 90. On their face and as applied to Plaintiffs, Wash. Admin. Code §§ 250-40-030(6)
14 and 250-40-050(8) have the principal and primary effect of inhibiting religion, in that they
15 exclude “sectarian” employers from the State Work-Study Program and thereby deny
16 opportunities for students who wish to work for “sectarian” employers, or perform “sectarian
17 related” work, under the program.

18 91. By refusing to reimburse the wages of students who pursue “sectarian related”
19 work or work for “sectarian” employers, Wash. Admin. Code §§ 250-40-030(6) and 250-40-
20 050(8) create a substantial disincentive to work by and for “sectarian” employers.

1 92. On their face and as applied to Plaintiffs, Wash. Admin. Code §§ 250-40-030(6)
2 and 250-40-050(8) violate the Establishment Clause of the U.S. Constitution insofar as they
3 exclude “sectarian” options from the State Work-Study Program.

4 **PRAYER FOR RELIEF**

5 Plaintiffs respectfully request that the Court grant the following relief:

6 A. A declaratory judgment by the Court that Wash. Admin. Code §§ 250-40-030(6)
7 and 250-40-050(8), on their face and as applied to Plaintiffs, violate the Free Exercise, Equal
8 Protection, and Establishment Clauses of the U.S. Constitution insofar as they exclude
9 “sectarian” options from the State Work-Study Program;

10 B. A preliminary and permanent injunction prohibiting Defendants from enforcing
11 Wash. Admin. Code §§ 250-40-030(6) and 250-40-050(8) insofar as they exclude “sectarian”
12 options from the State Work-Study Program;

13 C. An award of attorneys’ fees, costs, and expenses pursuant to 42 U.S.C. § 1988;
14 and

15 D. Any other legal or equitable relief the Court may deem appropriate and just.

16 Dated: September 11, 2018

Respectfully submitted,

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