No. 96132-8

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

MATTHEW S. WOODS,

Appellant,

v.

SEATTLE'S UNION GOSPEL MISSION,

Respondent.

Brief of Citygate Network as *Amicus Curiae* Supporting Respondent

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I. INTRODUCTION

Courts routinely acknowledge that religious organizations have constitutional protection when they make employment decisions based on religion, even with respect to non-ministerial employees. That is because a religious organization's constitutional right to be free from government intervention and impermissible entanglement outweighs the government's interest in enforcing employment nondiscrimination laws.

That well-established principle applies here. It is undisputed that Seattle's Union Gospel Mission is an overtly evangelical Christian ministry, and that the Mission considers it a primary responsibility of *all* Mission employees to share the gospel of Christ and further the religious purpose of the Mission. In such circumstances, a state law regulating employment must give way to the Mission's right to create and maintain a community composed of individuals faithful to the Mission's doctrinal practices, even if a particular employee does not perform traditional ministerial functions.

It makes no difference that an employee or prospective employee pleads a form of non-religious discrimination, such as sex or sexual orientation prejudice, when a religious organization asserts a good faith, religiously-motivated basis for making an employment decision. Allowing such claims to move forward would require judicial entanglement into questions of whether certain beliefs are integral to the organization's

mission, or whether an employee's actions were inconsistent with those beliefs. This would violate the Constitution and jeopardize the organization's ability to define its own religious beliefs and create and maintain a community of believers aligned with the organization's religious beliefs.

Here, Mr. Woods signed the Mission's statement of faith—including its declaration that the Bible is the only inspired, infallible, authoritative word of God—when he began volunteering at the Mission's Open Door Legal Services clinic. As part of an application process for a paid position with the clinic, Mr. Woods later disclosed to the Mission that he was in a same-sex relationship. The Mission respectfully explained that all its personnel are expected to live by its Biblical moral code that excludes sexual relationships other than between a married man and woman. Mr. Woods took the position that the Mission's Christian beliefs were wrong and should change. And his focus in this litigation has been to put the Mission's interpretation of the Bible on trial.

In these circumstances, Mr. Woods' claims fail under the WLAD's religious employer exemption, RCW 49.60.040(11), which—like its federal Title VII counterpart—merely affirms the Mission's federally protected constitutional rights. This Court should uphold the constitutionally-required statutory exemption and reaffirm the Mission's ability to live according to its faith principles. And the Court should do so notwithstanding *Ockletree*

v. Franciscan Health Systems, 179 Wn.2d 769, 317 P.3d 1009 (2014), which held merely that the exemption does not apply in circumstances unrelated to any religious concern, which is not the case here. The trial court's grant of summary judgment in the Mission's favor should be affirmed.

II. IDENTITY AND INTEREST OF *AMICUS*

Amicus Curiae Citygate Network, also known as the Association of Gospel Rescue Missions, is a nonprofit entity made up of nearly 300 organizations that provide emergency services and life-transforming programs for those in our society who are hungry, homeless, abused, and addicted. Seattle's Union Gospel Mission is an active member of Citygate Network. Citygate Network also includes those who provide services and resources for organizations and individuals serving these vulnerable populations.

Amicus is a 106-year-old national network of crisis shelters and life-recovery centers where leaders seek to move people in desperate situations and destitute conditions from human suffering to human flourishing. *Amicus* constitutes a diverse Biblically based faith driven group of Christian organizations that carry out their purpose and mission in a variety of programs. This community inspires and energizes each other in exercising their religious convictions.

The many organizations that comprise *Amicus* are guided by their religious beliefs. These Christian organizations conduct all their activities out of a Biblically-based motivation and mission. Their faith is the guiding star and driving force behind their activities. Their religious beliefs are also the basis for, expression of, and form the manner in which they carry out their activities. There is a belief by faith that Jesus of Nazareth was marvelously and simultaneously God and man—someone whose sinless life, death, burial, and resurrection are the basis for understanding and living life according to God's plan. This makes offering help and hope to people in destitute conditions and desperate situations an exciting endeavor, because it is essentially a way of proclaiming and achieving what God wants: that His Kingdom should begin to emerge, right here on earth, just as it already exists in heaven.

This case could have significant impact on the foundational religious liberty interests of *Amicus* and its many members. The decision could limit the ability of religious organizations of all types to carry out their mission and activities through individuals who share their faith, beliefs, and Biblically-based motivations. Requiring *Amicus*, its members, or any Biblically-based, faith-driven organization to hire individuals with a different belief, faith, and expression of beliefs would undermine the strength that comes out of shared religious convictions. It would even

expose these organizations to more legal liability in the form of hostile environment claims brought by employees who do not share the employer's faith and by requiring them to guess which positions qualify for co-religionist protection and which do not. Therefore, *Amicus* respectfully submits this brief to describe the invaluable right of religious organizations to exercise their religious freedom in selection of their personnel and in carrying out their mission and activities. Generally applicable laws cannot quash their right to religious autonomy.

III. BACKGROUND

Citygate Network generally incorporates the Statement of the Case that Respondent Seattle's Union Gospel Mission submitted. Citygate briefly summarizes the record facts most salient to its argument that courts cannot police a religious organization's attempt to create and maintain a community of employees who share the organization's religious beliefs.

Seattle's Union Gospel Mission is an overtly evangelical Christian ministry that preaches "the gospel of Jesus Christ by conducting rescue mission work in the City of Seattle." CP 72. It expressly characterizes its ministry as existing "to serve, rescue, and transform those in greatest need through the grace of Jesus Christ," with the goal of "inspir[ing] hope, bring[ing] healing, and point[ing] people to a new life through Jesus Christ." CP 77. There is no questioning the Mission's religious nature.

In accord with its ministry and beliefs, the Mission does not distinguish between employees who exclusively preach and teach a religious message and those who share the Gospel in word and deed by serving others. CP 65. *All* employees are expected to deliver the Mission's religious message and to further its religious mission. CP 64–65. Accordingly, the Mission rigorously adheres to religious standards for all employees, CP 63–67, 332, and it requires every employee to affirm the Mission's statement of faith, including the point that "We believe the Bible is the inspired, infallible, authoritative Word of God." CP 65, 82, 332.

The Mission also asks job applicants numerous questions about their faith and religious practices. CP 368–69. These questions include whether the applicant is active in a local church, the name and contact information for the applicant's pastor, and a description of the applicant's "relationship with Jesus Christ." *Id.* Candidates who pass the initial screening round are evaluated for their alignment with—and ability to faithfully represent—the Mission's religious beliefs and purpose. CP 67, 332, 702–03.

Unsurprisingly, the Mission requires employees to live according to what the Mission believes the Bible teaches. CP 65. This includes surrendering one's life to God in obedience, even if you do not fully comprehend or agree with what the Bible teaches as understood by the Mission. *Id.* Another is that Christians are called to abstain from sexual

activity outside of a marriage between one man and one woman. *Id.* An employee's public rejection of the Mission's interpretation of the Bible on these or other principles undermines the Mission's ability to carry out its ministry and religious purpose of sharing that Jesus is the only way to salvation. CP 65, RP 15.

One of the Mission's more than 20 programs serving the poor and vulnerable is a legal aid clinic called Open Door Legal Services. The clinic is itself part of a network of more than 70 such clinics affiliated with the Christian Legal Society. CP 372.

Unlike secular legal aid clinics, these Christian clinics are evangelistic and do much more than offer legal services. *E.g.*, CP 383 (recounting how a New Mexico clinic's lawyer helped a client pray and recommit his life to Christ). The Mission operates its Open Door Legal Services clinic with the same evangelical purpose as the Mission's other programs: to share the gospel of Jesus Christ.

Plaintiff Mr. Woods was initially an Open Door Legal Services clinic volunteer. CP 111. In that capacity, he signed the Mission's statement of faith. CP 118. Later, Mr. Woods sought full-time employment with the clinic and disclosed for the first time that he was in a same-sex relationship. CP 113, 322–23. He inquired how that relationship would fit with the Mission's religious beliefs and practices. *Id.*

When the Mission responded openly and respectfully about its religious behavioral expectations for all employees, Mr. Woods expressed his disagreement. CP 135. Among other things, Mr. Woods asserted that his religious beliefs were different than the Mission's, and that he believed the Mission should change its beliefs. *Id.* Understandably, the Mission could not change its religious beliefs because Mr. Woods did not like or choose to abide by them. This litigation represents Mr. Woods' effort to place the Mission's religious beliefs on trial. *E.g.*, CP 45, 235–97, 299–316.

IV. ARGUMENT

The Washington State Law Against Discrimination, colloquially known as WLAD, is a set of laws designed to protect individuals in the State of Washington from unlawful discrimination. Among other things, it prohibits invidious discrimination based on a person's sexual orientation. Importantly, however, the WLAD excludes nonprofit religious or sectarian organizations from its definition of "Employer." RCW 49.60.040(11). There is no doubt that the Mission is a religious nonprofit that is entitled to this exemption. So Mr. Woods invites this Court to hold that the WLAD's exemption for religious employers is unconstitutional.

The Court should respectfully decline that invitation. Courts across the country consistently recognize that religious organizations have discretion to hire and retain employees based on their religious beliefs.

Seattle's Union Gospel Mission has proffered a religious reason for its employment decision. Accordingly, that is the end of the analysis.

In *Ockletree*, some Justices of this Court suggested that the WLAD religious-employer exemption violated the Washington State Constitution's prohibition against special privileges and immunities in the case of an employee who was terminated for non-religious reasons. That decision has no application here. Indeed, if this Court were to rule similarly for Mr. Woods, it would be at odds with uniform decisions around the country.

A. It is constitutionally impermissible to forbid religious organizations from making employment decisions based on religion.

Federal prohibitions against discrimination in employment, embodied in Title VII, allow religious organizations to make employment decisions based on religion but not based on other protected characteristics like race and age. In that respect, the WLAD's complete exemption for religious employers is even broader than that in federal statutory law. Given the potential for entanglement with matters of religious doctrine, courts have strongly warned against assuming Title VII applies to religious organizations in all contexts and under all factual scenarios. *Curay-Cramer v. Ursuline Academy of Wilmington, Del., Inc.*, 450 F.3d 130, 140 (3d Cir. 2006).

Applying the so-called co-religionist doctrine, federal courts of appeals routinely acknowledge that it is constitutionally forbidden to prevent religious organizations from making employment decisions based on religion, even involving employees whose positions have little or no obvious religious significance. *Little v. Wuerl*, 929 F.2d 944, 947-48 (3d Cir. 1991); *Hall v. Baptist Mem'l Health Care Corp.*, 215 F.3d 618, 623 (6th Cir. 2000). That is because a religious organization's right to be free from government intervention outweighs any governmental interest in eliminating discrimination. *Little*, 929 F.2d at 951; *Kennedy v. St. Joseph's Ministries, Inc.*, 657 F.3d 189, 193 (4th Cir. 2011).

For example, in *Hall*, a Student Services Specialist at a Baptist College revealed she was a lesbian and attended a church that taught there was nothing inconsistent between Christianity and the homosexual lifestyle. In response to questions, she pointed her supervisor to churches and denominations that supported gay and lesbian relationships. When the College concluded that the employee could not continue in her position, she sued and claimed religious discrimination.

The Sixth Circuit began by noting that Title VII's religious exemption exists in recognition "of the constitutionally-protected interest of religious organizations in making religiously-motivated employment decisions." 215 F.3d at 623. And the "fact that the College trains its students

to be nurses and other health care professionals does not transform the institution into one that is secular." *Id.* at 625. Even if the plaintiff were able to prove a *prima facie* case of discrimination, "the First Amendment does not permit . . . courts to dictate to religious institutions how to carry out their religious missions or how to enforce their religious practices." *Id.* at 626. The College could not be held liable for employment discrimination when it fired an employee for "taking a leadership position in an organization that condones a lifestyle the College considers antithetical to its mission." 215 F.3d at 627.

B. Courts may not dictate to religious institutions how to carry out their religious missions or to enforce their religious practices.

The judicial branch should not decide what beliefs or conduct is consistent (or not) with a religious organization's orthodoxy. That is an issue religious actors—not the government—should decide. *Little*, 929 F.2d at 948. *Curay-Cramer*, 450 F.3d at 140–41. Courts cannot dictate to religious institutions how to carry out their religious missions or how to enforce their religious practices. *Hall*, 215 F.3d at 626.

In *Little*, a Protestant teacher sued her Catholic school employer after the school refused to renew her contract because she remarried without obtaining an annulment. The Third Circuit noted that under the First Amendment, when a religious organization presents convincing evidence

that it made an employment decision based on religious beliefs, the government lacks jurisdiction even "to investigate further to determine whether the religious discrimination was a pretext for some other form of discrimination." 929 F.2d at 948 (quotation omitted).

The constitutional limits on the ability of the court to adjudicate the teacher's claim were necessary to prevent government entanglement in matters of faith. "[T]he inquiry into the employer's religious mission is not only likely, but inevitable, because the specific claim is that the employee's beliefs or practice make her unfit to advance that mission. It is difficult to imagine an area of the employment relationship *less* fit for scrutiny by secular courts. Even if the employer ultimately prevails, the process of review itself might be excessive entanglement." *Id.* at 949. So, it did "not violate Title VII's [bar] on religious discrimination for a parochial school to discharge a Catholic or a non-Catholic teacher who has publicly engaged in conduct regarded by the school as inconsistent with its religious principles." *Id.* at 951.

C. Religiously-motivated personnel decisions include employing only those whose beliefs and conduct are consistent with an employer's religious precepts.

Given the above, it should be no surprise that federal courts of appeal have recognized consistently that religious organizations have the right to employ only those individuals whose beliefs and conduct are

consistent with the employer's religious precepts. *Little*, 929 F.2d at 951; *Hall*, 215 F.3d at 624; *Kennedy*, 657 F.3d at 192. And the most basic right reserved to a religious organization is the determination that an employee's beliefs or practices make him or her unfit to advance the organization's ministry and mission. *Little*, 929 F.2d at 949; *Curay-Cramer*, 450 F.3d at 139.

Consider *Kennedy*. There, a Catholic nursing-care facility fired a nursing assistant who was a member of the Church of the Brethren and refused to stop wearing her religion's long dresses and hair covering. She sued for religious discrimination and retaliatory discharge.

The Fourth Circuit quickly disposed of the claim: "Congress intended the explicit exemptions to Title VII to enable religious organizations to create and maintain communities composed solely of individuals faithful to their doctrinal practices, *whether or not every individual plays a direct role in the organization's 'religious activities*.'" 657 F.3d at 194 (quoting *Little*, 929 F.2d at 951) (emphasis added). The exemption reflects a Congressional decision "that the government[al] interest in eliminating religious discrimination by religious organizations is outweighed by the rights of those organizations to be free from government intervention." *Id.* at 194 (quoting *Little*, 929 F.2d at 951). That decision reflects precisely what the U.S. Constitution requires.

D. Religious organizations have the right to create and maintain communities composed of individuals faithful to an organization's doctrinal practices, no matter how direct a role they play in the organization's religious activities.

Mr. Woods and his *amici* suggest that the above principles apply only in the ministerial context, not to someone who serves in a legal aid clinic. They are wrong. Both within and without a religious organization's "ministerial activities," the organization has the right to hire and promote employees faithful to the organization's doctrinal practices. *Little*, 929 F.2d at 951; *Curay-Cramer*, 450 F.3d at 141; *Kennedy*, 657 F.3d at 194.

Religious organizations do not lose constitutional protection by engaging in nonprofit activities that some might deem "secular" or "non-ministerial." *Hall*, 215 F.3d at 625; *LeBoon v. Lancaster Jewish Cmty. Ctr. Ass'n*, 503 F.3d 217, 229 (3d Cir. 2007). And secular courts are categorically prohibited from deciding what activities do or do not have religious meaning. *New York v. Cathedral Academy*, 434 U.S. 125, 133 (1977); *Spencer v. World Vision, Inc.*, 633 F.3d 723, 731–32 (9th Cir. 2011) (O'Scannlain, J., concurring).

In *Leboon*, an evangelical Christian who served as a bookkeeper at the Lancaster Jewish Community Center Association sued for discrimination based on religion and retaliation for protected activity. The bookkeeper's argument was that because the Association's nature and purposes

were primarily cultural rather than religious, he could sue for religious discrimination.

Not so said the Third Circuit. Religious organizations may "engage in secular activities without forfeiting protection" under Title VII's religious exemption. 503 F.3d at 229. And courts cannot second-guess a religious organization's commitment to religion without risking "precisely the sort of state entanglement with religion that the Supreme Court has repeatedly warned against." *Id.* at 230 (citing *Corporation of Presiding Bishop of Church of Jesus Christ of Latter-day Saints v. Amos*, 483 U.S. 327, 343 (1987) (Brennan, J., concurring)).

E. When an employment claim involves a religious organization's beliefs, it does not matter if the plaintiff pleads some form of non-religious discrimination.

Mr. Woods and his *amici* also argue that his litigation should be allowed to go forward because he alleges discrimination based on his sexual orientation. As an initial matter, this is not entirely accurate. The Mission's stated reasons for not hiring Mr. Woods—not to mention Mr. Woods' own litigation strategy—demonstrates that the employment decision turned on the Mission's religious beliefs, not Mr. Woods' orientation. In other words, the Mission would have made the same decision if Mr. Woods had a heterosexual orientation but could not abide by other Biblical teachings as the Mission understands them. *Little*, 929 F.2d at 950 (religious nonprofits

have the right "to employ only persons whose beliefs and conduct are consistent with the employer's religious precepts").

Moreover, the argument is legally irrelevant. Courts apply the co-religionist exemption even when a plaintiff pleads some form of discrimination that is not religious discrimination. *E.g.*, *Curay-Cramer*, 450 F.3d at 139 (alleged sex discrimination based on claim that Catholic school fired female teacher for conduct—signing her name to a pro-choice advertisement in the local newspaper—that was less egregious under Catholic doctrine than the conduct of male employees who the school treated more favorably). That is because treating a religiously-motivated employment decision as some other form of discrimination equally jeopardizes a religious organization's ability to create and maintain communities composed of those faithful to their doctrinal practices. *Id.* at 141.

Moving forward with a discrimination claim against a religious organization in such circumstances "raises [ ] substantial constitutional question[s] under the First Amendment's Religion Clauses." *Curay-Cramer*, 450 F.3d at 137. And this is true even when a plaintiff styles her complaint as sounding in sex discrimination, for example, rather than religious discrimination. *Id.* at 139. In *Curay-Cramer*, the Third Circuit was loathe to compare the plaintiff employee to other employees who committed

alleged "offenses" against Catholic doctrine; to do so would have required the court "to engage in just the type of analysis specifically foreclosed by *Little*." *Id.*

F. Courts are constitutionally prohibited from assessing the plausibility of a religious organization's faith-based justification for its employment decisions.

That principle raises the penultimate point: courts should not be in the business of assessing a religious organization's faith-based reasons for making an employment decision. *Little*, 929 F.2d at 948–49; *Curay-Cramer*, 450 F.3d at 141. It is only when a religious organization offers no religious justification at all for an adverse employment decision involving a non-ministerial employee (as in *Ockletree*) that federal constitutional principles allow a court to litigate a discrimination claim. *Curay-Cramer*, 450 F.3d at 142; *Spencer*, 633 F.3d at 733 (O'Scannlain, J., concurring).

The Third Circuit explained this line plainly in *Little*. Drawing on the U.S. Supreme Court's Establishment Clause jurisprudence forbidding excessive government entanglement with religion, the court declined to engage in any inquiry involving religious teachings or doctrine: "In this case, the inquiry into the employer's religious mission is not only likely, but inevitable, because the specific claim is that the employee's beliefs or practices make her unfit to advance that mission." 929 F.2d at 949. Indeed,

said the court, it "is difficult to imagine an area of the employment relationship *less* fit for scrutiny by secular courts." *Id.*

Churches, the court explained, "have a constitutionally protected interest in managing their own institutions free of government interference." *Id.* (quoting Laycock, *Towards a General Theory of the Religion Clauses: The Case of Church Labor Relations and the Right of Church Autonomy*, 81 Colum. L. Rev. 1373, 1373 (1981)). As a result, the court could not apply federal non-discrimination prohibitions without raising "serious constitutional questions under both the free exercise and the establishment clauses." *Id.*

So too here. As pled in Mr. Woods' complaint, this case is either about Mr. Woods' disagreement with the Mission's religious beliefs, or it is about the Mission's policy to make hiring decisions consistent with those beliefs. Whether the former or the latter, courts should not (1) discern the nature or wisdom of the Mission's religious beliefs, (2) second-guess the plausibility of the Mission's faith-based justification of its employment decision, or (3) instruct the Mission that it lacks the authority to make employment decisions consistent with its religious beliefs. That is the end of the analysis.

G. *Ockletree* is not relevant here and should not be expanded so as to violate the U.S. Constitution.

Given the foregoing principles, it is immediately apparent why *Ockletree* is inapplicable here. *Ockletree* starts with the correct proposition: that religious organizations hold a special place in the constitutional hierarchy and may be granted statutory exemptions without violating the Washington Constitution. In fact, as the above authorities demonstrate, religious organizations sometimes *must* be granted statutory exemptions to avoid a constitutional violation. That is why all nine justices of this Court deemed the WLAD's religious exemption facially constitutional. 179 Wn.2d at 788–89; 317 P.3d 1009 (four-justice lead opinion); *id.* at 804 & n.6 (four-justice dissent); and *id.* at 805 (one-justice concurrence).

What distinguishes *Ockletree* from the present record is that the employee's claim in that case was that his employer—a religious hospital—discriminated against him "for reasons wholly unrelated to any religious purpose, practice, or activity." *Id.* at 772. As noted above, when a religious organization does not offer a religious justification for an employment action, courts have leeway to investigate further and process an employee's claim – unless the ministerial exception applies.

Where Mr. Woods and his *amici* confuse things is by suggesting that this Court can and should look behind the Mission's reason for not hiring

Mr. Woods in its legal clinic—Mr. Woods' disagreement with and refusal to abide by the Mission's religious beliefs and practices. Unlike the situation involving Mr. Ockletree, where the religious hospital offered no religious justification for its employment decision, the Mission's *only* articulated reason for not hiring Mr. Woods was religiously based and inextricably intertwined with the Mission's interpretation of Biblical teachings. In other words, to the extent Mr. Woods is asking this Court to revisit and expand *Ockletree*, this case is the wrong vehicle to do so. The facts establish that this case resides on the farthest end of the spectrum, where ministries' right to religious autonomy are at their apex.

For all these reasons, *Amicus* Citygate Network respectfully requests that the Court summarily affirm the well-reasoned decision of the trial court.

V. CONCLUSION

This Court should affirm the trial court's grant of judgment in favor of Seattle's Union Gospel Mission.

Respectfully submitted this 26th day of August, 2019.

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