



October 16, 2021

Office of Civil Rights  
U.S. Department of Education, 400 Maryland Ave.,  
SW Washington, DC 20202-1100

**Re: Request for Religious Exemption from Certain Applications of Title IX**

To Whom It May Concerns,

I am the President of Presbyterian Theological Seminary in America. As such, I am the "highest ranking official of this institution" and thus qualified to request a religious exemption under 34 C.F.R. §106.12(b). In that capacity, I hereby request on behalf of the Seminary, the religious exemption from Title IX of the Education Amendment of 1972, which is provided for under 20 U.S.C. §1681(a)(3) and 34 C.F.R. §106.12.

Presbyterian Theological Seminary in America (PTSA) was founded in 1979 as a minister training seminary based on Korean Presbyterian Church Abroad (KPCA) denomination. As stated in our catalog, PTSA exists to equip men and women for missional living by training them to grow in the knowledge and character of Christ, to live a Christ-centered life, and to lead others to do the same, in any setting God places them, whether it is multigenerational, multiracial, or multiethnic. During the 42 year history, 777 students graduated Presbyterian Theological Seminary in America and most of them are serving as pastors, missionaries, evangelists, and lay leaders in the world.

PTSA is recognized as a nonprofit corporation under the Corporations Code of California and qualifies for religious exemption pursuant to California Education Code CEC #94739 (b)(6). PTSA is licensed by the California Bureau of Private Postsecondary Education (BPPE) for the purpose of offering its educational programs. PTSA achieved an accredited status with ABHE(Association of Biblical Higher Education).

The Seminary, consistent with the historic understanding of the Holy Scriptures, does not permit sexual activity outside marriage between one man and one woman and affirms every individual's biological sex as assigned by God at birth. Therefore, consistent with these standards, Presbyterian Theological Seminary in America has developed doctrinal statements that specifically address matters of marriage, sexuality, gender identity, and sexual purity. These statements appear in our catalog as well. They are as follows:

13. Marriage has been ordained by God and is the exclusive covenantal union between a man and a woman in which such union is a lifetime commitment. A civil government's sanction of a union will be recognized as a legitimate marriage by the Church only to the extent that it is consistent with the definition of "marriage" found in these Articles.

14. Legitimate sexual relations are exercised solely within marriage. Hence, sexual



activities outside of marriage (referred to in the New Testament as “porneia”-- πορνεία) including but not limited to, adultery, premarital sex, homosexuality, and pedophilia are inconsistent with the teachings of the Bible and the Church. Further, lascivious conduct, transgender behavior, and the creation and/or distribution and/or viewing of pornography, are incompatible with the biblical witness.

As you already know, U.S. Supreme Court decided that it is impossible to discriminate against a person based on their sexual orientation or gender identity without discriminating against that person based on sex<sup>1</sup>. Accordingly, U.S. Department of Education recently confirmed that Title IX protects students from discrimination based on sexual orientation and gender identity<sup>2</sup>. If PTSA were bound to abide by this interpretation, it would be forced to violate many of the religious beliefs set forth in this letter.

PTSA therefore requests exemption from the following provisions of Title IX and its implementing regulations to the extent they are interpreted to conflict with PTSA’s position on marriage, sexuality, gender identity, and sexual purity:

- 34 C.F.R. §106.21 (admission)
- 34 C.F.R. §106.22 (preference in admission)
- 34 C.F.R. §106.23 (recruitment)
- 34 C.F.R. §106.31 (education programs or activities)
- 34 C.F.R. §106.32 (housing)
- 34 C.F.R. §106.33 (comparable facilities)
- 34 C.F.R. §106.34 (access to classes and schools)
- 34 C.F.R. §106.36 (counseling)
- 34 C.F.R. §106.37 (financial assistance)
- 34 C.F.R. §106.38 (employment assistance to students)
- 34 C.F.R. §106.39 (health and insurance benefits and services)
- 34 C.F.R. §106.40 (marital or parental status)
- 34 C.F.R. §106.41 (athletics)
- 34 C.F.R. §106.42 (standards for measuring skill or progress in physical education classes)
- 34 C.F.R. §106.51-61 (relating to employment)

Thank you in advance for your consideration. I look forward to hearing from you soon. If you have any questions, please do not hesitate to contact me.

Sincerely,

Sang Meyng Lee  
President,  
Presbyterian Theological Seminary in America

<sup>1</sup> *Bostock v. Clayton Cty.*, Nos. 17-1618, 17-1623, 18-107, 2020 U.S. LEXIS 3252 (June 15, 2020)

<sup>2</sup>See <https://www.ed.gov/news/press-releases/us-department-education-confirms-title-ix-protects-students-discrimination-based-sexual-orientation-and-gender-identity>

# DOCTRINAL DECLARATION STATEMENT

## Presbyterian Theological Seminary in America

ALL FACULTY MUST SUBSCRIBE TO THE FOLLOWING DOCTRINAL POSITION WITHOUT RESERVATION UPON EMPLOYMENT. THIS FORM MUST BE SIGNED AND DATED TO CONFIRM YOUR DOCTRINAL POSITION.

PLEASE BE AWARE, HOWEVER, THAT ONE'S DOCTRINAL POSITION IS ONLY TRULY EXHIBITED BY ONE'S LIFESTYLE AND THEOLOGICAL POSITION AND COMMUNICATION IN THE GOD APPOINTED TEACHING MINISTRY. THEREFORE, EVEN THOUGH A FACULTY MEMBER MAY VOLUNTARILY SUBSCRIBE TO THIS DOCTRINAL STATEMENT BY SIGNATURE, IF AFTER DUE PROCESS IT IS DETERMINED THAT THE FACULTY MEMBER DOES NOT ACTUALLY CONFORM TO THIS DOCTRINAL STATEMENT, THE FACULTY MEMBER CAN BE DEEMED IN BREACH OF ALL EMPLOYMENT CONTRACTS BETWEEN Presbyterian Theological Seminary in America AND THE FACULTY MEMBER CAN BE DECLARED NULL AND VOID BY THE SCHOOL'S ADMINISTRATION.

THEREFORE, EVEN THOUGH A FACULTY MEMBER MAY VOLUNTARILY SUBSCRIBE TO Presbyterian Theological Seminary in America SUBSCRIBES TO THE FOLLOWING STATEMENT OF FAITH:

1. The Holy Scriptures of the Old and New Testament are the Word of God, the only inerrant, perfect rule of faith and deed.
2. There is only one God, and one shall worship only God alone; God is the spirit, is self-existent omnipresent, and distinguished from all other Gods and the created; God is infinite, eternal and unchangeable in God's being, wisdom, power, holiness, justice, goodness and love.
3. There are three Person in the Godhead; the Father, the Son, and the Holy Spirit; God is the triune God, one in trinity, equal in power and glory.
4. God created all things visible and invisible by the power of God's Word, and preserves and governs them, but God in God's nature causes no sin. God plans and acts according to God's own will and governs all things to fulfill God's purpose which is good, wise, and holy.
5. God created people, after God's own image in knowledge, righteousness, and holiness with dominion over every living thing. All people of the world are of sole source; that is of same native and brother.
6. Our first parents, being left with the freedom to choose between good and evil, through temptation, transgressed the commandment of God. All humankind, descending from Adam by ordinary generation sinned in him and fell with him in his transgressed. The humanity, having the potential to commit a crime, besides the original sin and the corrupted human nature, has intentionally committed sin; so as we are justly liable to God's just displeasure and punishment in this world and that which is to come.
7. God sent God's eternal, only begotten Son, Jesus Christ to the world to save humanity from sin, the corruption and the punishment thereof, to give eternal life in God's infinite love; in Jesus Christ God become flesh and through Him can humanity be saved. The eternal Son became true human and possessed two distinctive personhoods in His nature, eternally as true God and true power of the Holy Spirit, in the womb of the virgin Mary, of her substance, born of

her, yet without sin. He obeyed perfect the of God, offered His body, became a true and perfect sacrifice and satisfied divine justice. For the purpose of reconciliation between God and humanity, Jesus Christ was crucified on the cross, died and buried. One the third day, He rose again from the dead. He is sitting on the right hand of God making intercession for His people. From thence He shall come for the resurrection of the dead, and to judge the world.

8. The Holy Spirit, being out of God the Father and God the Son, works salvation in people, convicts them of their sin and misery, enlightens their hearts to know Christ, renews their will, exhorts them, empowers to accept Jesus Christ who freely offers humanity the Gospel in grace, and also works in us to bear the fruit of God's righteousness.

9. Before God created the world, God elected in God's love God's own people to make them holy and blameless, predestined and adopted God's children through Jesus Christ according to God's pleasure and will, to the praise of the glory of God's grace bestowed freely in the one God loves. However, the perfect salvation offered freely is to be ordered to all humankind that they may repent of their sins, believe in the Lord Jesus Christ as their Savior, rest upon him and follow him, obey the revealed will of God, be humble and conduct themselves in holiness, to the extent that whoever believes in Christ and is obedient to him shall be saved. The particular benefits that are accompanied with justification, adoption as God's children, sanctification and glorification are for the believers who are assured with God's salvation and joy in this world. The means of the grace to the call of office by the Holy Spirit are the bible, sacraments and prayer in particular.

10. The sacraments instituted by Christ are baptism and holy communion; baptism of washing with water to be administered in the name of God the Father, the Son and the Holy Spirit, is the sign and seal of joining us in union with Christ, and the promise for our regeneration and renewal by the Holy Spirit and God's possession of us. Baptism shall be served in remembrance of Christ's death, and in the witness of the seal for the benefit derived from Christ's death with which the believers are in union. Holy communion shall be observed by God's people until the day of the Lord's coming, and is a sign of a promise of a more faithful service onto the Lord and a sign of communion with the Lord and his people, who believe in him, and rest upon his atonement from which God's benefit flow to us. The benefits of the sacraments are not found in the sacraments themselves or any virtue of one by whom the sacraments are being administered, but only in the blessing by Christ and the working of the Holy Spirit in those who by faith receive the sacraments.

11. All believer shall dutifully join in church membership with instruction, have fellowship with one another among the believers, observe the sacraments and other ordinances, obey all the laws of the Lords, pray always, observe the Lord's Day holy, assemble with believers to worship he Lord and listen attentively to the preaching of the Word of God, render offerings as God provides us abundantly, share with one another the mind of Christ, share also the same mind with all other people, endeavor to promote the expansion of the Kingdom of Christ upon the whole world and wait expectantly for the appearance of the Lord in his glory.

12. The dead shall receive the reward according to the good and evil done in this world before the judgement seat of Christ when they will be resurrected in the last day. Those who believe in Christ, and are obedient to him shall be truly forgiven and accepted by him in Glory.

13. Marriage has been ordained by God and is the exclusive covenantal union between a man and a woman in which such union is a lifetime commitment. A civil government's sanction of a union will be recognized as a legitimate marriage by the Church only to the extent that it is consistent with the definition of "marriage" found in these Articles.

14. Legitimate sexual relations are exercised solely within marriage. Hence, sexual activities outside of marriage (referred to in the New Testament as "porneia"-- πορνεία) including but not limited to, adultery, premarital sex, homosexuality, and pedophilia are inconsistent with the teachings of the Bible and the Church. Further, lascivious conduct, transgender behavior, and the creation and/or distribution and/or viewing of pornography, are incompatible with the biblical witness.

I, \_\_, ON THIS DAY OF \_\_\_\_\_ DO HEREBY FULLY SUBSCRIBE TO THE ABOVE DOCTRINAL STATEMENT AND FULLY UNDERSTAND THAT AT ANYTIME IT IS DETERMINED BY THE DESIGNATED ADMINISTRATIVE AUTHORITY OF Presbyterian Theological Seminary in America THAT I NO LONGER CONFORM TO THE SCHOOL'S DOCTRINAL TENETS THAT ALL CONTRACTS BETWEEN MYSELF AND Presbyterian Theological Seminary in America CAN BE IMMEDIATELY DECLARED NULL AND VOID.



Sender: Please print your name, address, and ZIP+4® in this box\*  
Sunny Kim  
15605 Carmentia Rd.  
Santa Fe Springs, CA 98670

United States Postal Service

9590 9402 5056 9092 2118 84

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10



USPS TRACKING#



미주장로회신학대학교  
Presbyterian Theological Seminary in America  
15605 Carmentia Rd. Santa Fe Springs, California 90670  
Tel. 562. 926. 1023 • Fax. 562. 926. 1025 • www.ptsa.edu

DEFINITELY



LOS ANGELES CA 900  
19 OCT 2021 PM 3 L

7021 0950 0002 2441 2373



1024



20202

U.S. POSTAGE  
FROM LETTER  
CERRITOS,  
90703  
OCT 19, 21  
AMOUNT  
\$7.00  
R2304W121

DEFINITE RECEIPT



10/25/2021  
10/25/2021 1:12 PM

TO: PCP-OCR  
LOC1:  
LOC2:  
LOC3:



70210950000224412373

20202-

Assistant Secretary for  
Civil Rights

400 Maryland Ave.

SW Washington, DC 20202

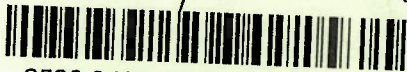
CERTIFIED MAIL®  
 PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
 OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

400 Maryland Ave  
 SW Washington, DC 20202  
 "Assistant Secretary for Civil Rights"



9590 9402 5056 9092 2118 84

2. Article Number (Optional)  
 021 0950 0002 2441 2373

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

Agent

Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type

- |  |   |
|--|---|
| <input type="checkbox"/> Adult Signature                               | <input type="checkbox"/> Priority Mail Express®                     |
| <input type="checkbox"/> Adult Signature Restricted Delivery           | <input type="checkbox"/> Registered Mail™                           |
| <input type="checkbox"/> Certified Mail®                               | <input type="checkbox"/> Registered Mail Restricted Delivery        |
| <input type="checkbox"/> Certified Mail Restricted Delivery            | <input type="checkbox"/> Return Receipt for Merchandise             |
| <input type="checkbox"/> Collect on Delivery                           | <input type="checkbox"/> Signature Confirmation™                    |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery       | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail                                  |   |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) |   |