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January 12, 2016

Catherine E. Lhamon Assistant Secretary for Civil Rights  
U.S. Department of Education  
Office for Civil Rights  
400 Maryland Avenue, SW  
Washington, DC 20202-1100

Re: Rhema Bible Church, Inc. Request for Title IX Religious Exemption

Dear Ms. Lhamon:

My firm represents Rhema Bible Church, Inc., a non-profit church organization, which operates Rhema Bible Training College. Please find enclosed a letter from my client requesting a religious exemption under 34 C.F.R. § 106.12 from certain regulations under Title IX.

Please direct any inquiries, correspondence, determinations, or other communications related to this matter to me using the contact information listed above or by email to [wrcarter@wintersking.com](mailto:wrcarter@wintersking.com).

Thank you for your prompt consideration of this request.

Kindest regards,

  
Wesley R. Carter



## Rhema Bible Training College

P.O. Box 50126, Tulsa, Oklahoma 74150-0126

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January 6, 2016

Catherine E. Lhamon, Assistant Secretary for Civil Rights  
U. S. Department of Education  
Office for Civil Rights  
400 Maryland Avenue, SW  
Washington, DC 20202-1100

Re: Rhema Bible Church, Inc. Request for Title IX Religious Exemption

Dear Mrs. Lhamon:

I am the highest ranking official at Rhema Bible Church, Inc. doing business as Rhema Bible Training College. As Senior Pastor of Rhema Bible Church, a non-profit church organization, which operates Rhema Bible Training College as a seminary for the training of ministers of the Gospel, I am writing this letter to apply to the Office of Civil Rights of the Department of Education under 34 C.F.R. § 106.12 for a religious exemption from certain regulations under Title IX. The particular regulations for which exemption is requested are:

34 C.F.R. § 106.21 regarding prohibitions against denial of admission or discrimination in admission on the basis of sex, marital, or parental status to the extent that such prohibitions have been or may be interpreted to include discrimination on the basis of gender identity or same sex marriage.

34 C.F.R. § 106.23 regarding prohibitions against discrimination in recruitment and admission on the basis of sex to the extent that such prohibition has or may be interpreted to include discrimination on the basis of gender identity or sexual orientation.

34 C.F.R. § 106.31 regarding prohibitions against discrimination related to education programs and activities on the basis of sex to the extent that such prohibitions have been or may be interpreted to include discrimination on the basis of gender identity or sexual orientation.

34 C.F.R. § 106.32 regarding prohibitions against discrimination related to housing on the basis of sex to the extent that such prohibitions have been or may be interpreted to include discrimination on the basis of gender identity or sexual orientation.

34 C.F.R. § 106.33 regarding prohibitions against discrimination related to restrooms and locker rooms on the basis of sex to the extent that such prohibitions have been or may be interpreted to include discrimination on the basis of gender identity or sexual orientation.

34 C.F.R. § 106.34 regarding prohibitions against discrimination related to access to classes and schools on the basis of sex to the extent that such prohibitions have been or may be interpreted to include discrimination on the basis of gender identity or sexual orientation.

34 C.F.R. § 106.40 regarding prohibitions against discrimination related to marital or parental status of employees on the basis of sex to the extent that such prohibitions have been or may be interpreted to include discrimination on the basis of gender identity or sexual orientation.

34 C.F.R. § 106.41 regarding prohibitions against discrimination related to athletics on the basis of sex to the extent that such prohibitions have been or may be interpreted to include discrimination on the basis of gender identity or sexual orientation.

34 C.F.R. § 106.51 regarding discrimination in employment, to the extent that such prohibitions have been or may be interpreted to include discrimination on the basis of gender identity or same sexual orientation.

34 C.F.R. § 106.53 regarding prohibitions against discrimination related to recruitment and hiring on the basis of sex to the extent that such prohibitions have been or may be interpreted to include discrimination on the basis of gender identity or sexual orientation.

34 C.F.R. § 106.57 regarding prohibitions against discrimination related to marital or parental status of employees to the extent that such prohibitions have been or may be interpreted to include discrimination on the basis of gender identity or sexual orientation.

Rhema Bible College is under the corporate umbrella of and is fully controlled by Rhema Bible Church, which is recognized as a tax exempt church by the Internal Revenue Service under Section 501(c)(3) of the Internal Revenue Code. Application of the regulations listed above as they pertain or may pertain to prohibitions against discrimination on the basis of gender identity or sexual orientation, would not be consistent with the religious beliefs of Rhema Bible Church.

Rhema Bible Church (which also does business as Kenneth Hagin Ministries) is a worldwide ministry based on faith, prayer, and the healing truths in God's Word. Founded in 1963 by my father Rev. Kenneth E. Hagin, and currently led by myself Rev. Kenneth W. Hagin with the help of my wife, Lynette Hagin, my son, Craig W. Hagin, and my daughter, Denise Burns, we are dedicated to reaching people with the Good News of Jesus Christ.

We accomplish this mission through various ministries which include:

- Rhema Bible Training College;
- The Word of Faith magazine;



- Faith Library Publications;
- Rhema Praise television broadcast;
- Rhema for Today radio program;
- Rhema Prayer and Healing Center;
- Rhema Prison Ministry;
- Rhema Correspondence Bible School;
- Living Faith Crusades; and
- Various a (Campmeeting, Winter Bible Seminar, Kindle the Flame Women's Conference, A Call to Arms Men's Conference).

At *Campmeeting* 1974, my father announced that the school would open in the fall. However, the ministry did not have enough money to start the program. My father told the Lord, "This is Your school, not mine. You finance it, because I can't. Now, I'm not going to worry a bit about it. You take care of it." Thousands of dollars in offerings came in that year at *Campmeeting*, providing the funds to begin the school. In the fall of 1974, 73 students enrolled. Of those, 58 graduated in May 1975. Since then over 26,000 have graduated from Rhema Bible Training College in the United States, and nearly 60,000 have graduated worldwide.

The statement of beliefs of Rhema Bible Church<sup>1</sup> states:

"The Bible is the inspired Word of God, the product of holy men of old who spoke and wrote as they were moved by the Holy Spirit. The New Covenant, as recorded in the New Testament, we accept as our infallible guide in matters pertaining to conduct and doctrine."

Rhema Bible Church believes in the inerrancy and truth of Scripture as presented in the Holy Bible. We believe God instituted marriage between male and female as the foundation of the family, the basic structure of human society. (Genesis 2:24) We believe God has commanded that no intimate sexual activity be engaged other than in the context of marriage between a man and a woman. (Genesis 19:5, 26:8-11; Leviticus 18:1-30; Romans 1:26-29; 1 Corinthians 5:1, 6:9; 1 Thessalonians 4:1-8; Hebrews 13:4).

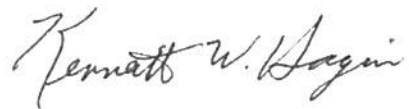
We further believe that a person cannot change their birth gender. All persons are created in God's image and are made to glorify Him. (Genesis 1:27; Isaiah 43:7) God's design was the creation of two distinct and complementary sexes, male and female. (Genesis 1:27; Matthew 19:4; Mark 10:6) We reject all attempts at defining or altering one's sexual identity or gender in any manner. (Matthew 19:4; Deuteronomy 22:5)

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<sup>1</sup> Rhema Bible Church, *About Us – What We Believe*,  
[http://www.rhema.org/index.php?option=com\\_content&view=article&id=5&Itemid=138](http://www.rhema.org/index.php?option=com_content&view=article&id=5&Itemid=138)

Based upon our religious beliefs, I am requesting on behalf of Rhema Bible Church and Rhema Bible Training College an exemption from the specific Title IX regulations listed herein to the extent they are interpreted to reach sexual orientation and gender identity issues.

If you require anything further, please feel free to contact me.

A handwritten signature in black ink that reads "Kenneth W. Hagin". The signature is written in a cursive style with a large, prominent initial 'K'.

Kenneth W. Hagin  
Senior Pastor and President

**WINTERS & KING, INC.**

ATTORNEYS AND COUNSELORS AT L

2448 EAST 81ST STREET, SUITE 5900  
TULSA, OKLAHOMA 74137-4259



TO: LBJ-OCR

LOC1: LBJ

LOC2: OCR

LOC3:

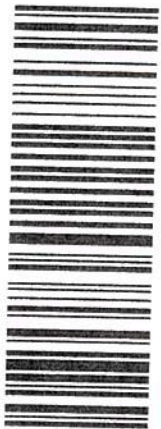
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13 JAN 2016

TULSA OK 741



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CATHERINE E. LHAMON ASSISTANT SECRETARY  
FOR CIVIL RIGHTS  
U.S. DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS  
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WASHINGTON, DC 20202-1100

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