



# REAPING THE SEEDS OF CHANGE

The Struggle for LGBTQI Equality  
at Taxpayer-Funded Christian Colleges



SEEKING SAFETY & EQUALITY  
FOR LGBTQ STUDENTS AT  
RELIGIOUS COLLEGES

The **Religious Exemption Accountability Project** (REAP) empowers queer, trans and non-binary students at more than 200 taxpayer-funded religious colleges and universities that actively discriminate on the basis of sexual orientation and gender identity/expression. Through civil rights litigation, storytelling, oral history, research and public policy, we work toward a world where LGBTQ students on all campuses are treated equally, with safety and respect.



## A snapshot of our growth this year:

- Attorneys General from 18 States and DC filed amicus brief in support of Plaintiffs' challenge to Trump-era expansion of religious exemption to Title IX
- 94,167 pages views on the REAP website (March 1, 2021 through February 28, 2022)
- 7 witnesses testified for Plaintiffs during 3-day live preliminary injunction hearing
- 9,195 miles on the road to meet plaintiffs and support campus events

### 2020-2021:

Paul Southwick travels around the country on a "Rainbow Roadtrip" engaging with LGBTQ students at religious colleges:



*"I traveled about 10,000 miles by car over two months to visit LGBTQ+ students and alumni harmed by their religious colleges and universities. In small towns and big cities, I cried with, encouraged and plotted with brave people who were willing to share their stories and to stand up to discrimination and our government that sanctions it. The suffering is heavy and widespread. The hunger to be seen is strong and universal. And the desire to create change is palpable and exciting. I'll be forever grateful to the many who shared their stories with me and for those who, for their own safety, could not but are privately rooting for our collective freedom."*

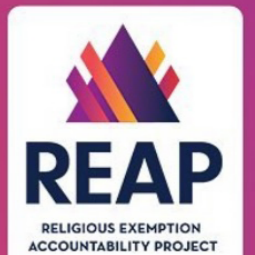
-PAUL SOUTHWICK, REAP DIRECTOR



I'm grateful for the support that we received this year from REAP, including helping to get the word out about SPU's anti-LGBTQ+ policies and providing us with important insight and guidance on how to effectively mobilize and push back. REAP may have grabbed headlines and online buzz for filing a first-of-its-kind lawsuit. But their impact stretches beyond the courtroom and onto campuses across the country."



**- LAUR LUGOS**  
Seattle Pacific University Student



### February 2021:

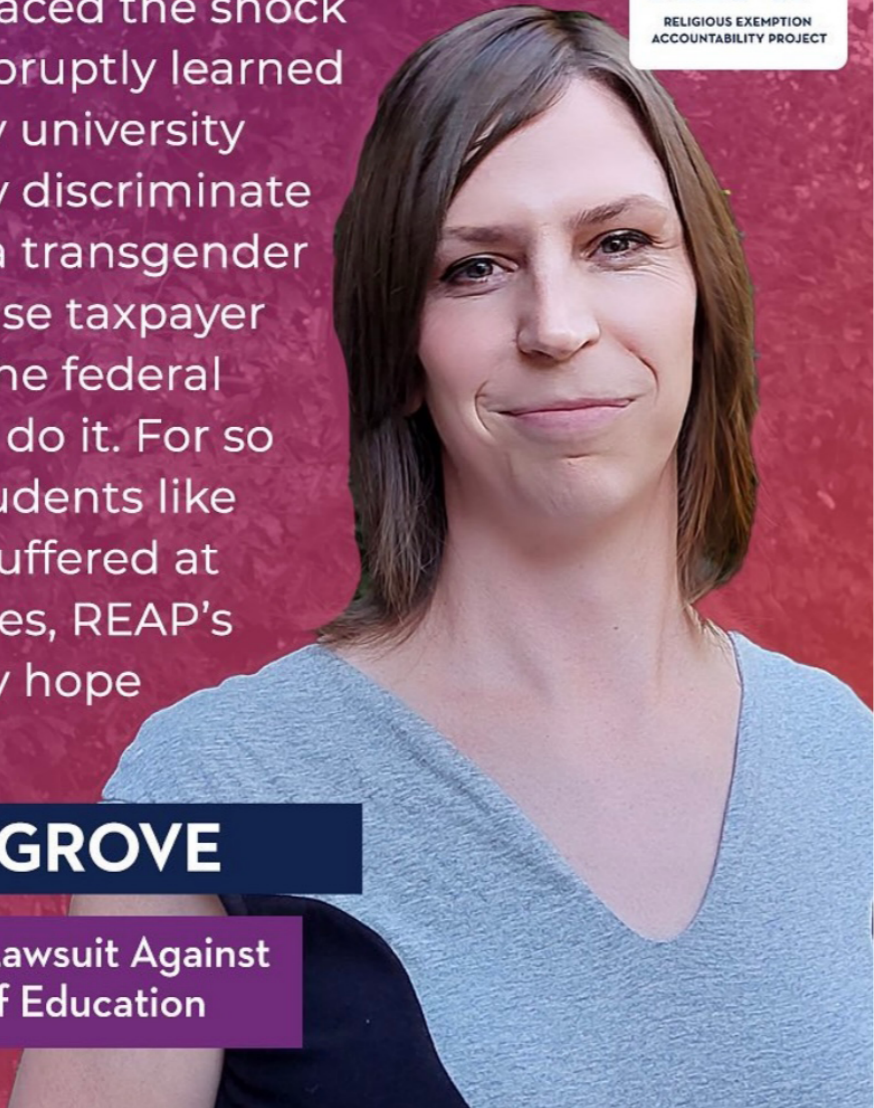
The Religious Exemption Accountability Project (REAP) commissioned College Pulse to undertake a national poll of college student experiences on Christian colleges and universities to better understand the experiences of LGBTQ+ students at these campuses.

This study offers a first-of-its-kind insight into the rampant discrimination, abuse and mistreatment faced by LGBTQ students at taxpayer-funded religious colleges and underscores the urgent need to ensure safety, dignity and respect for queer and transgender students at religious schools nationwide.





Just as I began living as the woman I know myself to be, I faced the shock of my life as I abruptly learned that in 2021, my university could so openly discriminate against me as a transgender woman – and use taxpayer funding from the federal government to do it. For so many queer students like me who have suffered at religious colleges, REAP’s work is our only hope for justice.”



**KALIE HARGROVE**

Plaintiff in REAP Lawsuit Against the Department of Education

**March 29, 2021:**

Religious Exemption Accountability Project (REAP) filed a class action lawsuit against the U.S. Department of Education on behalf of 33 plaintiffs from 25 evangelical & LDS colleges in 18 states. The complaint, filed in U.S. District Court for the District of Oregon, seeks to nullify the religious exemption to Title IX that allows widespread discrimination against LGBTQ students at faith-based colleges and universities across the nation. The plaintiffs include a mix of current students (some of whom are using a pseudonym for their safety), recently expelled students, and recent alumni who suffered conversion therapy and other discipline from their colleges for being LGBTQ.

**May 15, 2021:**

REAP hires paralegal/admin Lauren Swain. A lifelong advocate for social and environmental justice and participatory democracy, Lauren earned her BA at the University of Denver, and, more recently her Associate of Applied Science in Paralegal Studies at Arapahoe Community College. As a campaign staffer and organizer for many progressive groups, candidates, and ballot initiative campaigns, Lauren has applied her aptitude for public policy, communications, and networking to engage Colorado’s diverse communities in political action since 2013. From 2005 to 2016, Lauren worked for Denver Public Schools, the Colorado Department of Public Health and the Environment, and the Arizona Refugee Resettlement Program in collaboration with local refugee leaders and resettlement service providers to produce, write, record and edit a series of multilingual videos orientating refugees to critical health and education services and strategies.

**SINCE LAUNCHING THIS YEAR, REAP’S BEEN BUSY:**



- Published an unprecedented research project.
- Launched a first-of-its-kind class action lawsuit against the Dept. of Education.
- Provided pro bono legal & organizing support for LGBTQ+ students at religious schools.

**DONATE TO SUPPORT**





## Late May 2021:

REAP hires Joseph Baxter as Legal Fellow. Joseph spent his undergraduate years at a religiously owned and operated university, Brigham Young University – Idaho, where he witnessed first-hand the discrimination that LGBTQ+ students faced and became passionate about fighting religiously motivated discrimination both through promoting cultural change and through challenging our legal system’s status quo. During Law School, Joe focused a large portion of his legal studies on the current imbalance between LGBTQ+ human rights and religious liberties, and he wrote his Capstone on the issue of LGBTQ+ discrimination at religious universities that receive federal funds. Joe graduated with Honors from Lewis & Clark Law School in May of 2021. He was a Lead Article Editor for the Lewis and Clark Law Review and was elected to represent his class on the Student Bar Association. While in Law School, Equal Justice Works and the Legal Services Corporation awarded Joe with a Rural Summer Legal Corps Fellowship, which was created to help address the access-to-justice crisis affecting under-privileged individuals in rural areas. Joe also spent a year as a clerk with the Portland law firm Kell, Alterman & Runstein, where he gained experience in a broad range of legal matters, with special focus on disability rights advocacy.



## June 1, 2021:

REAP hires Josiah Robinson as Research and Public Policy Fellow. Josiah attended two conservative Christian universities with explicitly anti-LGBTQ+ policies and practices. He graduated summa cum laude from Oral Roberts University as Outstanding Communication Senior and with Honors from Regent University School of Law ('21). During law school, he was awarded First Place in a legal writing competition, Third Best Oralist in a moot court competition, and the Book Award for the highest grade in his Appellate Advocacy course. He interned with the Office of the Federal Public Defender, the Virginia Court of Appeals, and an international law school in South Korea—each experience solidifying his commitment to public interest policy. He has also volunteered as a Court Appointed Special Advocate with Tulsa CASA and Norfolk CASA. Josiah attended the 2020 LGBT Bar Association’s LEAD Academy as the first openly queer representative from his law school.







“ Obviously you want to do the most for the cause that you can, and that’s why I decided to attach my name [to this lawsuit challenging anti-LGBTQ discrimination at taxpayer-funded religious colleges]. ... You have to keep reminding yourself everything you’re doing is for a cause bigger than you.”

**VERONICA PENALES**

Student at Baylor University and Plaintiff in REAP Lawsuit



**June 2021:**

REAP hires Erin Green as the new Campus and Alumni Organizer for REAP. They are an affirming biblical scholar and LGBTQ+ activist. Erin has a Bachelor of Arts in Biblical Studies from Azusa Pacific University and an M.Div. from San Francisco Theological Seminary. Their specialties are in the entire Christian biblical corpus with an emphasis on the Hebrew Bible, the ancient Near East, exegesis, and how to employ various hermeneutical methods. Erin’s passion is helping those excluded by the church to heal from spiritual abuse and trauma by navigating the biblical text in restorative ways. Erin is best known for their work in supporting LGBTQ+ students on conservative, Christian university campuses and in religious spaces.

**June 8, 2021:**

REAP filed an amended complaint with the court – which includes new constitutional claims in our lawsuit and the addition of seven new plaintiffs, each with a unique story of how discrimination at the hands of taxpayer-funded religious colleges have impacted them. This filing brings our case up to 40 total plaintiffs – which include a mix of current students, graduates, recently expelled students and a parent.



“ REAP’s work is life-saving – and for the first time, gives me hope that institutions like Moody Bible Institute will finally be held accountable for the trauma they regularly inflict on LGBTQ students like me.”

**MEGAN STEFFEN**

on supporting REAP’s work for LGBTQ+ students on Give OUT Day





“ It’s time for our government to hold accountable the institutions they fund by requiring them to safeguard all students on their campuses, regardless of sexual orientation or gender identity. Without intervention, thousands of students will remain vulnerable, unheard, and unsupported.

## MEGAN STEFFEN

Plaintiff in Lawsuit Challenging Anti-LGBTQ Discrimination at Taxpayer-Funded Religious Colleges



### August 23, 2021:

Elder Jeffrey Holland (the Former President of BYU and current Apostle of the LDS Church), spoke to the faculty of Brigham Young University and criticized what he described as their failure to defend the anti-LGBTQ+ policies of the Church. He also denounced BYU graduate Matt Easton’s heroic act of coming out during his commencement speech as valedictorian of BYU’s political science program in 2019. Immediately following, REAP condemned these actions formally and publicly.

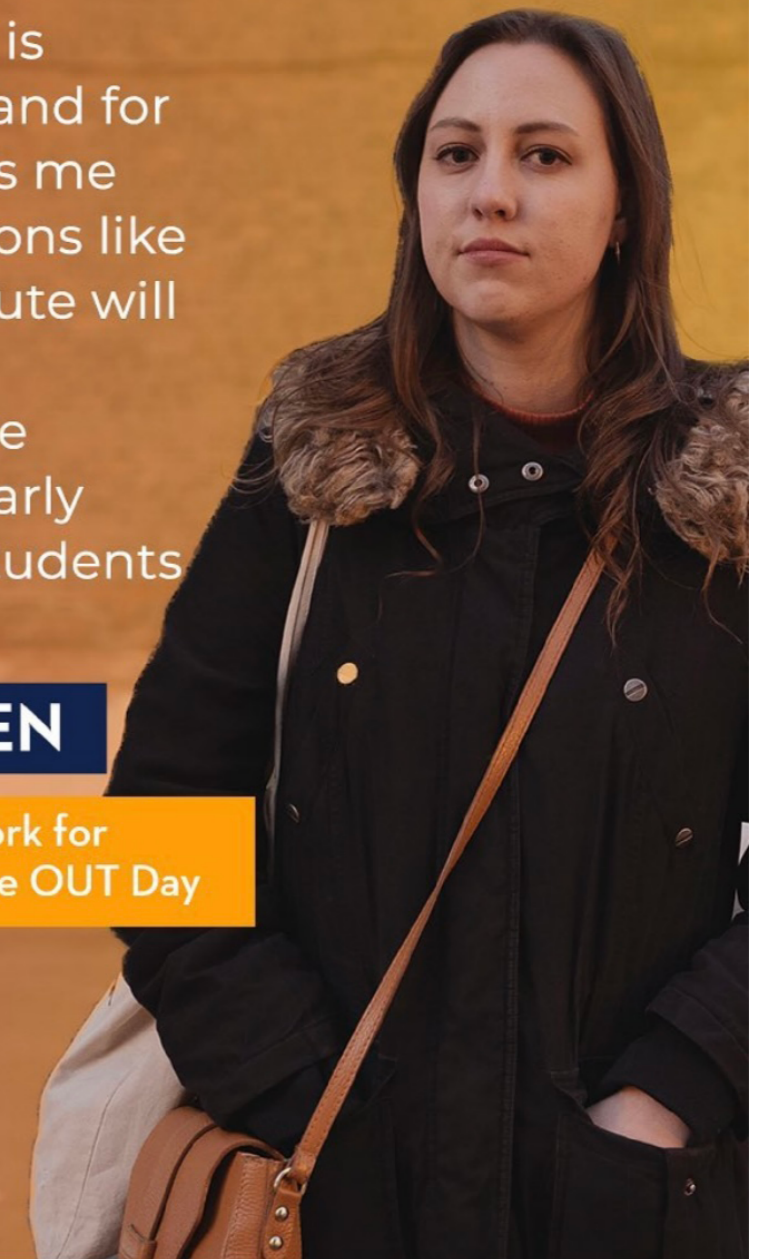
### August 25, 2021:

REAP created a “Take the Pledge” Initiative against the actions of Elder Jeffrey Holland at BYU, creating a tangible way for voices to be heard regarding anti-LGBTQ discrimination at religious colleges: <https://www.thereap.org/post/take-the-pledge-to-support-lgbtq-students-at-byu-and-other-taxpayer-funded-religious-schools>

“ REAP’s work is life-saving – and for the first time, gives me hope that institutions like Moody Bible Institute will finally be held accountable for the trauma they regularly inflict on LGBTQ students like me.”

## MEGAN STEFFEN

on supporting REAP’s work for LGBTQ+ students on Give OUT Day





“ If we are successful in this lawsuit, Liberty and schools like it will finally be forced to choose: Either **treat LGBTQ+ students equally** and with dignity or find another way to finance their homophobia.”

**LUCAS WILSON**

Plaintiff in Lawsuit Challenging Anti-LGBTQ Discrimination at Taxpayer-Funded Religious Colleges




### August 2021:

REAP aids all plaintiffs and additional Queer and Trans students in filing Title IX complaints against their schools which have actively discriminated against them for being LGBTQ.

### August 2021:

REAP creates a petition calling on the Office of Civil Rights to protect LGBTQ+ students at religious colleges: [tell-the-office-of-civil-rights-to-protect-lgbtq-students-at-religious-colleges-and-universities](#)

### August 27, 2021:

After a disturbing week of anti-LGBTQ incidents at BYU, which began with Elder Holland calling on faculty to use their “musket fire” to oppose equal treatment of LGBTQ students and ended with a horrific incident of anti-LGBTQ hate, our director Paul Southwick went live on Facebook to discuss how REAP will support and work to protect queer students who are facing discrimination on campus: [video-reap-s-director-paul-southwick-responds-to-week-of-anti-lgbtq-incidents-at-byu](#)

### September 4, 2021:

Three members of REAP (Joe Baxter, Paul Southwick, and Josiah Robinson) attend a march and rally at Brigham Young University and join LGBTQ students in solidarity and protest against Elder Holland’s abusive language toward LGBTQ students at BYU.

### September 4, 2021:

Campus and Alumni Organizer, Erin Green attends the Wild Goose conference in North Carolina to represent REAP and network with other organizations and meet potential current and former students of religious colleges.

### September 13, 2021:

REAP releases another public video with Campus and Alumni Organizer, Erin Green, breaking down why Queer and Trans students exist at religious college campuses: [986027205587306](#)

### September 17, 2021:

REAP meets virtually to help Queer and Trans students at Lee University where the school removed “gender identity” from protections in its anti-discrimination policy. The students engaged in social media posts featuring its Queer alumni to demonstrate their Pride and their disagreement with Lee University administration.

### September 20, 2021:

Campus and Alumni Organizer, Erin Green appears on the Magnificast Podcast to talk about REAP’s work in protecting LGBTQ students at religious colleges nationwide.



## September 30, 2021:

Director of REAP, Paul Southwick and Campus and Alumni Organizer, Erin Green, record a podcast on Exvangelical regarding the landmark lawsuit that REAP filed as well as the racist and discriminatory roots of religious exemptions.

## October 2021:

REAP begins to work with more LGBTQ student groups around the country, this time at Fresno Pacific University, where a Queer Pride Group was denied legitimacy by its Board of Trustees. REAP publicly responded by boosting the Pride Club's petition on change.org: [fresno-pacific-university-board-of-trustees-support-the-creation-of-a-lgbtq-pride-club-at-fresno-pacific-university](https://www.change.org/p/fresno-pacific-university-board-of-trustees-support-the-creation-of-a-lgbtq-pride-club-at-fresno-pacific-university)

In addition, REAP releases a public statement condemning the actions of the Board of Trustees and deems them discriminatory: [reap-responds-to-fresno-pacific-university-s-discrimination-of-lgbtq-student-leaders](https://www.reap-advocacy.org/2021/10/20/reap-responds-to-fresno-pacific-university-s-discrimination-of-lgbtq-student-leaders)

## October 2021:

REAP meets with the Policy Director, Wayne Yeh of District 9, Office of Boston City Counselor, Liz Breadon, to discuss guidance or insight on how to best approach advocating for private religious educational institutions in Boston to support LGBTQ+ students on campus. They had been in contact with current undergraduate students who have been advocating for queer student support programming on campus, as well as their difficulty in engaging the administration in responding to discrimination and bias incidents.

## November 1, 2021:

Attorneys General from 18 states and the District of Columbia filed an Amicus Brief in the Religious Exemption Accountability Project's [lawsuit](https://www.reap-advocacy.org/2021/11/01/amicus-brief-in-hunter-et-al-v-us-dept-of-education), Hunter et al v. The Dept. of Education, which would prevent the U.S. Department of Education from granting religious exemptions to taxpayer-funded religious colleges and universities that discriminate against LGBTQ+ students. Read the brief here: [b017d0\\_5548ffc7d1684ec78a01580750aa680d.pdf](https://www.reap-advocacy.org/2021/11/01/amicus-brief-in-hunter-et-al-v-us-dept-of-education)



## November 4th, 2021:

### THE HISTORIC LIVE HEARING

Opening statements begin with Director of REAP, Paul Southwick, who states that religious colleges have explicitly discriminated against the plaintiffs in the case who are asking for the court to address structural stigma and harassment.

The court hears from 5 plaintiffs and expert witnesses on individual harms caused by religious schools onto LGBTQ persons.

**"THE QUESTION BEFORE THE COURT TODAY: IS INVIDIOUS DISCRIMINATION  
AGAINST LGBTQ PERSONS AT RELIGIOUS COLLEGES LAWFUL?"**

-PAUL SOUTHWICK, REAP DIRECTOR

## LANDMARK LAWSUIT:

*Elizabeth Hunter, et al. v. U.S. Department of Education*

"Our lawsuit asks a federal court to declare that the religious exemption to Title IX, as applied to a class of LGBTQ+ students attending the more than 200 religiously affiliated colleges in the United States that openly discriminate against them, using taxpayer dollars, is unconstitutional."

**- PAUL  
SOUTHWICK**

Attorney and Director of  
the Religious Exemption  
Accountability Project





## November 5th, 2021:

REAP continues to collaborate with Queer student groups around the country. The LGBTQ student group (SPU ASSP) at Seattle Pacific University “takes over” the REAP Instagram account and educates REAP’s followers on protecting Queer and Trans Students at Christian colleges.

## November 5th, 2021:

Christian Rock singer Grace Baldrige agrees to represent REAP at their concert for Seattle Pacific University Queer students by wearing a REAP t-shirt during the conference and demonstrating their solidarity with REAP’s mission, values, and goals.

## November 10, 2021:

REAP enters a number of collaborative partnerships with various LGBTQ-affirming organizations across the country:

- Our Bible App creates a REAP writers’ shelf where stories of LGBTQ+ students at religious colleges can be featured to over 30,000 subscribers of Our Bible App. REAP also enters into a collaborative partnership with Free Mom Hugs and creates a campaign to send cards and care packages to plaintiffs as well as Queer and Trans students at religious colleges across the country.
- REAP partners with Exvangelical, where REAP is featured on the Exvangelical podcast and Blake Chastain, Exvangelical’s founder announces a donation campaign which includes REAP among other organizations to receive donations to organizations which aid in expelling religious and spiritual abuses.
- REAP works with Campus Pride on sharing and dissemination information regarding religious schools and abusive policies and actions. Campus Pride and REAP work together to publicly expose and address the harms that religious colleges pose to LGBTQ students. In 2021 Campus Pride released its “Absolute Worst” list, noting the most unsafe college campuses for LGBTQ+ students. The organization cited REAP’s lawsuit in many of its listings and determined that schools that have requested a religious exemption from Title IX are often unsafe and hostile climates for LGBTQ+ students.



## December 8th, 2021:

REAP adds to their plaintiff representation and now represents 48 LGBTQ students and alumni – completely pro-bono – as they demand that the federal government stop granting exemptions to the religious schools that have abused and harmed them.

## December 10, 2021:

REAP works with LGBTQ students at Walsh University to create a petition which calls on the university to respond to Queer students and acknowledge their desire to create an official safe space and club for LGBTQ students and allies: [call-on-walsh-university-to-allow-a-safe-space-club-for-lgbtq-and-allied-students](#)

## December 10, 2021:

REAP works with students at Oral Robert’s University and Faithful America to create a petition demanding that ORU update the honor code to remove its ban on “homosexual activity,” ensure a safe space for LGBTQ students, and respect the God-given dignity and worth of each and every student. No student should have to live in fear and hiding: [tell-oral-roberts-university-change-your-anti-lgbtq-honor-code](#)





## January 12, 2022:

The Religious Exemption Accountability Project (REAP) received notice from the Office for Civil Rights (OCR) of the U.S. Department of Education (DOE) that the agency will initiate a Title IX investigation of Lincoln Christian University (LCU) based on a complaint REAP submitted to OCR last October on behalf of Kalie Hargrove, a trans woman and former LCU student.

OCR's notification letter cited an allegation made in the complaint that "in August 2021, the University discriminated against Kalie Hargrove (Student A) on the basis of sex (gender identity) by directing her either to withdraw from classes or face discipline because she publicly identified as transgender." REAP founder and director, Paul Southwick, stated that "We are glad to see the Office for Civil Rights take this important step in protecting the rights of LGBTQ+ students at taxpayer-funded religious colleges. However, we fear that the religious exemption to Title IX will likely result in the dismissal of Kalie's complaint."

## January 19, 2022:

The Office for Civil Rights (OCR) of the U.S. Department of Education (DOE) notified the Religious Exemption Accountability Project (REAP) on Tuesday that the agency will initiate a Title IX investigation of Clarks Summit University (CSU) in Pennsylvania based on a complaint REAP submitted last July on behalf of Gary Campbell, a gay man and former CSU student. This is the second time in under two weeks that OCR has launched an investigation into a complaint filed by REAP.

The agency's letter said it will investigate an allegation that "The University maintains a policy in its Student Handbook prohibiting students from engaging in same-sex romantic or sexual relationships, as well as from 'cross-dressing or other actions deliberately discordant with birth gender.'" REAP director, Paul Southwick, stated that "this action potentially affects hundreds of educational institutions and demonstrates that OCR has the power to investigate taxpayer-funded religious schools whose disciplinary or other policies discriminate against LGBTQ+ students." But Southwick cautioned that: "Unfortunately, once an investigation is opened, these Title IX complaints will likely ultimately be dismissed once the school asserts a religious exemption. That's why our Title IX lawsuit challenging the validity of the religious exemption is so important."



## January 24, 2022:

Mormon Stories Podcast engages discussion about the groundbreaking Federal Investigation against Brigham Young University for its treatment of LGBTQ+ students with attorney Paul Southwick and Legal Fellow Joe Baxter. We discuss the investigation and its relation to recent changes in LDS and BYU policy. This episode also analyzes BYU's initial response to the Office of Civil Rights and addresses how folks can help advance equality at BYU. <https://www.youtube.com/watch?v=xYhClh0RoBw>



# REAP Religious Exemption Accountability Project



Religious Exemption Accountability Project  
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