

Samantha Mills Private School Program Manager Wyoming Department of Education Hathaway Building, 2<sup>nd</sup> Floor 2300 Capitol Ave. Cheyenne, Wyoming 82002-0050

VIA Facsimile (307-777-6234) and U.S. Mail

Re: WYDE's December 15, 2009 letter to Reverend Landis

Dear Ms. Mills,

Our client, Reverend Don Landis of Community Bible Church, received your letter stating that state law requires a ministry of his church, Jackson Hole Bible College, to become registered with or licensed by the state Department of Education. We hope the information provided in this letter will address the Department's request.

Jackson Hole Bible College ("JHBC") is a religious instructional ministry of Community Bible Church that is provided to Christians along with the church's Sunday School and Christian Academy programs. JHBC is led by Rev. Landis, the pastor of the church. JHBC teaches principles of religious leadership, and it does this through exclusively religious studies.

JHBC is not accredited because it believes that accreditation would undermine its religious purpose, a fact which it publicly advertises. JHBC's training program lasts for only nine months. JHBC does not grant degrees conferred with the designation of associate, baccalaureate, master, professional, specialist, or doctorate to those who complete its program.

Since JHBC does not grant degrees to the Christians who complete its training program, it does not need to either register with the Department of Education or pursue accreditation. Also, since JHBC is a leadership school within the meaning of W.S. § 21-2-406(iv), it requests exemption from licensure.

All the same First Amendment concerns that were identified by ADF on behalf of Frontier School of the Bible are implicated here, and perhaps even more saliently, given the limited and religiously-focused nature of JHBC's program. Thus, if the Department of Education sought to enforce licensure or registration requirements, JHBC would be required to litigate to defend its rights. Fortunately, given that Wyoming House Bill 16, which enjoys broad bi-partisan support, has been submitted to restore the statutory exemption for all religious schools, this whole issue may soon be moot.

We hope this addresses the issues you raised in your December 15, 2009 letter. If you have any further questions or concerns, please feel free to contact me.

Sincerely,

Daniel Blomberg

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CC: Rev. Don Landis