



October 30, 2014

URGENT

Jan Lindsay, QC, President
The Law Society of British Columbia
845 Cambie Street,
Vancouver, BC V6B 4Z9

Dear President Lindsay:

RE: Trinity Western University ("TWU") School of Law

We write with respect to the motion (the "Motion") passed by the Benchers on September 26, 2014. As reported by you, the Referendum conducted pursuant to the Motion met the thresholds set out in the Motion, with the required percentage of lawyers voting in favour of the Resolution declaring that our proposed law school "is not an approved faculty of law".

While we cannot know what motivated each lawyer to vote for this Resolution, and in fact we have been advised that some voted for it simply because of their opinion that B.C. does not need another law school, the vocal opposition to our School of Law has focused on six words contained within TWU's Community Covenant. As you know, our Community Covenant, including those words, articulate religious beliefs on which TWU is based and reflect a shared commitment within our community to uphold common evangelical Christian standards of behavior.

The Motion contemplated that the Benchers will automatically implement this Resolution. In our letter of September 16, we explained why doing so would be a breach of the Benchers' administrative law duties.

It is still open for the Benchers to make any further decision with respect to future TWU School of Law graduates based on the constitutional and other legal issues and principles involved, instead of accepting a popular vote. For the reasons set out in our previous submissions, and despite the result of the Referendum, there is only one decision open to the Benchers that accords with their statutory duties under the *Legal Profession Act*: to abide by the decision they made on April 11, 2014.

To support that decision, we are writing to provide the Benchers with copies of a number of affidavits that have been filed in the *Loke v. Minister of Advanced Education of British Columbia* proceeding.

We are enclosing copies of the following:

- (a) *Affidavit of Dr. Jeffrey Greenman*: Dr. Greenman is a Christian theologian and ethicist. He provides evidence about the historical and current Evangelical Christian understanding and beliefs of marriage, including its religious significance to our community. He explains how the Community Covenant comports with historical and current evangelical Christian teachings, including in its requirement that members of our community treat everyone with kindness, respect, compassion and love (paragraphs 51 and 57).

Dr. Greenman notes (para.39) that approximately 11-12% of the Canadian population is associated with communities reflecting evangelical Christian beliefs and practices. This is the religious minority in Canada that is primarily served by TWU and of which TWU is a part.

- (b) *Affidavit of Samuel Reimer*: Dr. Reimer is a sociologist with extensive expertise on evangelicalism in Canada. He explains how evangelical Christians comprise a distinct religious subculture in this country and that it is common for both religious and non-religious subcultures to maintain distinctive codes of conduct. These benefit the group by increasing the strength and commitment of members and by providing meaning and a sense of belonging to members.

These benefits are in addition to the constitutionally protected rights our members enjoy to freedom of religion, freedom of association and freedom of expression under the *Charter*.

Dr. Reimer goes on to explain how subcultures, and particularly the one served by TWU, benefit society in a variety of ways. In short, Dr. Reimer's evidence explains why it remains important to TWU to maintain its Community Covenant, suggesting the harm that will be done to TWU if it were compelled to discard it.

- (c) *Affidavit of Dr. Gerald Longjohn*: Dr. Longjohn is an expert in college student spiritual formation and the development, and application of student conduct codes in North American Christian colleges and universities. In his expert report, he describes how it is common and expected for all colleges and universities to have codes of conduct and that, for Christian institutions, these commonly include (but are not limited to) expectations related to moral standards with biblical rationales.

With his background, Dr. Longjohn studied TWU's Community Covenant and opines that it is well-aligned with our Core Values, similar in tone and content with documents at other Christian universities and has important spiritual formation and restorative functions. He states that the Community Covenant is conducive to the integration of faith and learning at TWU. The Community Covenant is not merely an issue of culture; it is important to TWU's statutory mandate to provide university education "with an underlying philosophy and viewpoint that is Christian."

- (d) *Affidavit of William (Bill) Taylor*: Mr. Taylor is the Executive Director of the Evangelical Free Church of Canada and explains the historical and current connection

between TWU and that Christian denomination of churches. He explains how and why the Community Covenant continues to be an important aspect of the religious foundation of TWU. As he explains, an “attempt to separate faith and theological belief from how a believer lives” (para. 30) is artificial and would render meaningless the teachings of Jesus. He explains how the Community Covenant is an important relational bond within our Christian educational community and that, without such a mutual commitment, TWU would “effectively cease to be an expressly evangelical Christian community” (para. 47).

- (e) *Affidavit of Brayden Volkenant*: Mr. Volkenant is an evangelical Christian and a TWU alumnus. He describes his experience at TWU and explains his desire to attend the TWU School of Law.
- (f) *Affidavits of Arend Strikwerda, Austin Davies, Iain Cook, Jason Cowan, Jessie Legaree and Natalie Hebert*: These are some of the affidavits filed in the *Loke* proceeding from TWU alumni that demonstrate: (a) the diversity of TWU's student body; (b) the importance of the Community Covenant to our community; and (c) how our community has honoured the obligation in the Community Covenant to “treat all persons with respect and dignity, and uphold their God-given worth”.

Prior to implementing the result of the Referendum, we ask that the Benchers carefully consider these affidavits, particularly in light of the constitutional protections afforded TWU and the members of our community under the *Charter of Rights and Freedoms*. While there is no evidence that TWU School of Law graduates will not be fully qualified to practice law, these materials provide further context and evidence of the harm that would be caused to TWU and the members of our community should the Benchers decide to reject our graduates' academic qualifications based on our religious beliefs.

Sincerely,



Bob Kuhn, J.D.
President



This is the 1st Affidavit
of Jeffrey P. Greenman in this case
and was made on 28 July 2014

No. S-142908
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TREVOR LOKE

PETITIONER

AND:

MINISTER OF ADVANCED EDUCATION OF BRITISH COLUMBIA and
TRINITY WESTERN UNIVERSITY

RESPONDENTS

AFFIDAVIT

I, Dr. Jeffrey P. Greenman, Theologian and Ethicist, of Vancouver, British Columbia, MAKE
OATH AND SAY AS FOLLOWS:

1. I am Executive Vice President and Academic Dean and also Associate Professor of Theology and Ethics at Regent College in Vancouver, British Columbia. I have personal knowledge of the facts and matters hereinafter deposed to by me, except where the same are stated to be on information and belief, and as so those facts, I believe them to be true.
2. Regent College is located at 5800 University Boulevard, Vancouver, B.C. and is on the campus of the University of British Columbia. Regent College was founded in 1968 and is a graduate school of theology. It welcomes students from all ends of the theological spectrum but, as an institution, is both evangelical and orthodox. As an evangelical institution, Regent College has a statement of faith modeled on that of the World Evangelical Fellowship.

3. Between 1985 and 1988, I studied Christian theology and ethics at the graduate level at Regent College, including completion of two full courses on Christian ethics which involved study of issues of marriage and sexuality.
4. During my doctoral studies at the University of Virginia between 1991 and 1996, I served as a teaching assistant for two years supporting two courses in Christian ethics which both dealt with issues of sexuality.
5. On an uninterrupted basis since 1994, I have been teaching undergraduate or graduate-level courses on Christian theology and ethics. I have taught a course with specific content about marriage, family, and sexuality approximately 12 times, at three different institutions: Tyndale Seminary in Toronto, Wycliffe College in Toronto, and Wheaton College in Wheaton, Illinois, USA.
6. Attached as Exhibit "A" to this my Affidavit is a true copy of my curriculum vitae.
7. I have been asked by legal counsel for Trinity Western University ("TWU") to provide an opinion based on my expertise as a Christian theologian and ethicist. I have been asked, and am able to give evidence on the historical and current evangelical Christian theological perspectives on marriage and sexual ethics, particularly in relation to sex outside of opposite-sex marriage.
8. I am aware that, as an expert, my duty is to assist the court and not to be an advocate for any party. I have prepared my responses in conformity with that duty and will, if called on to give oral or written testimony, give that testimony in conformity with that duty.

Documents and Information

9. In preparing my opinion, I have reviewed and considered the following documents, which were provided to me by legal counsel for TWU and which can be found online at the addresses indicated below:

- (a) Community Covenant, which I was able to access at:
<https://twu.ca/studenthandbook/twu-community-covenant-agreement.pdf>
- (b) Statement of Faith of TWU, which I was able to access at:
<http://twu.ca/divisions/hr/employee/documents/statement-of-faith.pdf>
- (c) TWU Core Values, which I was able to access at:
<http://twu.ca/about/values/>
- (d) Parts of the TWU Student Handbook, which I was able to access at:
2013-2014: <https://twu.ca/studenthandbook/>
2012-2013: <http://twu.ca/studenthandbook/student-handbook-2012-2013.pdf>

10. I have assumed that the following facts are true:

- (a) TWU was established in 1962 through and by the Evangelical Free Church of America.
- (b) TWU retains ties with the Evangelical Free Church of Canada and the Evangelical Free Church of America.
- (c) TWU is a liberal arts and sciences university based in Langley, British Columbia, that provides education with an underlying philosophy and viewpoint that is Christian.
- (d) All faculty and staff of TWU agree to and annually sign the Statement of Faith.
- (e) All members of TWU's community, including faculty, staff and students agree to the terms of the Community Covenant.

- (f) The terms and statements of the Community Covenant are based on the religious beliefs and teachings of TWU.

Areas of Opinion

11. I have been asked to answer the following questions:

1. *What is the historical Christian view of marriage? On what religious/theological basis was this view held and what was its religious significance?*
2. *What is the historical Christian view on the morality of sexual conduct? On what religious or theological basis was this religious view held and was it integral to Christian faith?*
3. *Please explain what is meant by evangelical Christianity in contemporary Canada.*
4. *What is the current evangelical Christian view of marriage? On what religious or theological basis was this view held and what is its religious significance within current evangelical Christian faith?*
5. *What is the current evangelical Christian view on the morality of sexual intimacy: (a) outside of opposite sex marriage; and (b) between persons of the same gender? On what religious or theological basis is this view held and is it integral to current evangelical Christian faith?*
6. *What does current evangelical Christianity teach about the status of persons who may engage in homosexual sex or enter into a same-sex marriage? What does current evangelical Christianity teach about how such persons should be treated?*
7. *Do the TWU Statement of Faith and Community Covenant generally conform with widely held current evangelical Christian beliefs?*
8. *Do evangelical Christian communities typically ask their members to abstain from sexual intimacy outside of opposite sex marriage?*

I will answer each question under a separate heading. I am solely responsible for the content of the answers provided.

12. Attached as Exhibit “B” to this my Affidavit is the bibliography of works cited by me in answering these questions. I also make references to Biblical sources, as noted, and will provide footnoting as appropriate.

1. What is the historical Christian view of marriage? On what religious/theological basis was this view held and what was its religious significance?

13. ***The Christian view:*** Throughout its long history, Christians have believed that the human institution of marriage has been ordained by God. This means that marriage was originated and designed by God according to God’s purposes, known through the Bible and apprehended by human reason. An implication is that the design of marriage is not a purely human or political choice, but is a matter of divine revelation.
14. Marriage in historic Christian tradition has been defined as an exclusive, lifelong covenantal union of male and female (husband and wife). As such, marriage is shared between the spouses to the exclusion of all others persons. This exclusive nature protects the integrity of the married relationship from inappropriate emotional or sexual intimacy with others who are not one’s spouse. Marriage is also “covenantal” in the sense that marriage is characterized by a pledge of unreserved trust, sacrificial love, and total commitment between spouses, a bond which is intended to be nurtured and sustained throughout a lifetime together.
15. ***Basis of view:*** The basis and source for this view of marriage is the Bible. Christian writers since the early centuries of Christianity have appealed consistently to the Scriptures of Old and New Testaments in providing the basis for their teachings about marriage.
16. According to the book of Genesis, chapter 1 and 2, the purpose of marriage is grounded in the narrative of God’s creation of the world and God’s intentions for human life. Christians believe that God’s direct work in creation reveals the design of well-ordered cosmos and provides the direction for well-ordered human life.

17. The depiction of marriage and sexuality in Genesis 1-2 unfolds in the text through several stages. According to Genesis 1:27, God made humankind in the divine image. Both male and female are bearers of that image. They share an equal dignity and status before God. Male and female are created by God as complementary partners, ordered toward one another as people who share together in the responsibility of following God's command: "Be fruitful and increase in number, fill the earth and subdue it." Accordingly, there is a human vocation (an assigned calling from God) to reproduction, which requires male-female partnership.
18. The narrative continues in chapter 2 with additional details of the story. Many Christian theologians over the centuries have believed that Genesis 2:18-25 includes the first reference to the institution of marriage.
19. According to Genesis 2:18, God declares: "It is not good for the man to be alone. I will make a helper fit for him." This verse has been understood to mean that human beings are not intended to be solitary beings, but rather are intended to live in community with others. In particular, this implies that the male is not able to fulfill his role in creation without female companionship and without a female partner in reproduction. The animals made by God are not "suitable helpers" (Gen. 2:20) for the man. The narrative continues by telling how God created woman out of the rib of the man. The man then recognizes the woman as his proper counterpart and covenant partner by saying, "This now bone of my bones and flesh of my flesh." This statement affirms not only sameness in kind, but loyalty and allegiance between man and woman as complementary partners in God's design. It implies a physical and spiritual bond between male and female in the divine order of the world.
20. Then, in Genesis 2:24, the text states: "For this reason a man will leave his father and mother and be united to his wife, and they will become one flesh." This verse is the Bible's first explicit reference to marriage. The text provides the foundational rationale for marriage: male-female "one flesh" union which forms a new family. The reference to becoming "one flesh" is to sexual intercourse and spiritual unity within the bond of

marriage between husband and wife. Through “one flesh” sexual union, the couple are enabled to fulfill God’s commandment to “be fruitful and multiply” (Gen. 1:28). The reference to reproduction indicates that marriage is ordered toward the development of family life through procreation and education of children.

21. There is additional basis for the Christian view of marriage as a mutual, exclusive, lifelong covenantal union of male and female in the teachings of the New Testament. The teachings of Jesus recorded in the New Testament affirm this same definition and rationale. There is an important text found in Matthew 19:4-6 (and in a parallel passage in Mark 10:6-8). Jesus is responding to a question about the propriety of divorce, and states: “Haven’t you read,” he replied, “that at the beginning the Creator ‘made them male and female,’ and said, ‘For this reason a man will leave his father and mother and be united to his wife, and the two will become one flesh’? So they are no longer two, but one flesh. Therefore what God has joined together, let no one separate.” This text is important in showing clearly that Jesus affirms the same view of marriage taught in the Old Testament, and the same basis or rationale for it.
22. It is important to recognize that Christian teaching has never required individuals to be married. Being married is not a spiritual or religious duty. While marriage is according to God’s design for human flourishing, there is no biblical commandment to enter into marriage. Jesus himself was celibate and did not marry. Christian theologians have often spoken of the life of Jesus as setting the supreme example of the validity of singleness throughout life.
23. ***Religious significance:*** Because Christians understand marriage as a divinely instituted form of shared life, marriage takes a central position in theological understandings of the good life for human beings to live. Created by God and conducive to human flourishing, marriage is good. Those who enter into it are living a way of life which is fully pleasing to God since it is consistent with his intentions for human flourishing. In addition, as a divinely instituted shared form of life, marriage has been blessed, encouraged and supported within the central structures of religious life. An example is the practice of

couples being married in congregational settings, wherein the couple exchange make vows of fidelity to each other in the presence of a worshipping, praying and supporting congregation. Congregations of all Christian traditions (Roman Catholic, Protestant and Eastern Orthodox) consistently provide ministry toward married couples which aims to strengthen the spiritual and moral quality of their marriages, to assist them with struggles in their family life, and to support them as parents. This ministry is undertaken often through voluntary small group meetings or focused retreats. In larger Protestant churches, it is common for congregations to employ clergy who are given a specialized ministry to married couples and their children.

2. *What is the historical Christian view on the morality of sexual conduct? On what religious or theological basis was this religious view held and was it integral to Christian faith?*

24. ***The Christian view:*** The historic Christian view of the morality of sexual conduct begins with the affirmation that human sexuality is a generous gift of God as humankind's creator. Sexual desire, pleasure and intimacy are positive dimensions of human life on account on God's design for human beings, and not to be associated primarily with humankind's sin but with God's good purposes for human life. As creatures made by God, human beings are accountable to God for their conduct in all areas of life, including sexuality. Living according to God's design for sexuality is expected for all people, even in the absence of their explicit recognition of the divine ordering of human life. Moral standards of conduct for sexual expression are derived from the Bible's teachings, and are applicable to all humanity as creatures made by God, regardless of their religious choices. The historic Christian view of sexual morality holds that God's design for the expression of sexual intimacy is that it is to be shared exclusively within the lifelong exclusive, covenant relationship of marriage between man and woman. Those who are unmarried are expected to abstain from sexual relations, living chaste and celibate lives. Same sex intercourse is contrary to biblical teaching and therefore morally unacceptable.

25. ***Theological basis:*** The theological basis for this view of sexual morality is based on the Bible's teaching. Historical Christian theology has taught that Genesis 1-2 reveal God's

will for sexual intimacy as expressed only within the confines of heterosexual marriage. The sexual activity involved in husband and wife becoming “one flesh” is exclusively a feature of married life. Nowhere in Scripture is there an affirmation of the moral acceptability of sexual intimacy outside of marriage.

26. The central source for Christian moral teaching, the Ten Commandments or Decalogue, upholds the ideal of sexual fidelity within marriage. The Seventh Commandment, “You shall not commit adultery” (Exodus 20:14; Deuteronomy 5:18) prohibits sexual intercourse between a married person and someone else. The total rejection of adultery is a central tenet of Christian morality. The prohibition of adultery is meant to protect the vitality of marriage, and also to ensure the sexual exclusivity of the marital relationship.
27. In addition, there are other passages of Scripture where the morality of sexual conduct is taught. There is an extensive sexual code of conduct taught in Leviticus, chapters 18 and 20. These are detailed, lengthy listings of the types of sexual relationships that are explicitly prohibited. In Leviticus, “all forms of incest (sex with a relative), homosexuality, adultery, cultic prostitution, premarital sex and even bestiality (sex with an animal) are forbidden.”¹ By elimination, this passage of Old Testament law reveals sexual intercourse is morally acceptable only within the husband-wife married relationship.
28. In the New Testament, these same prohibitions are carried over from the Old Testament. They are considered valid by the New Testament authors, without qualification. Therefore, the New Testament does not alter the moral teaching about sexuality found in the Old Testament, but reaffirms the same viewpoint. The prohibitions of Leviticus 18 are accepted by the New Testament authors without any debate about them and without modifying them. The Greek term *porneia*, which has been translated as “fornication” in older translations, and now is commonly translated as “sexual immorality” is an

¹ Scott B. Rae, *Moral Choices: An Introduction to Ethics* (Grand Rapids: Zondervan, 1995), 202.

“umbrella term” that incorporates the broad exclusions of Leviticus 18 and 20.² In the New Testament, references to “sexual immorality” as prohibited are referring to any sort of sexual conduct outside of the man-woman sexual intimacy of marriage.

29. In the New Testament, there is consistent teaching that the followers of Jesus must avoid “sexual immorality” of all kinds. There are many passages. For the purposes of this opinion, I will select a few examples. Hebrews 13:4 states, “Marriage should be honored by all, and the marriage bed kept pure, for God will judge the adulterer and all the sexually immoral.” Sexual conduct is morally accountable to God. In addition, there are lists of vices—specific sins—recorded in the New Testament that include “sexual immorality.” For instance, Jesus classifies adultery and “sexual immorality” as comparable morally to murder, theft, false testimony and slander (Matthew 15:19). The apostle Paul teaches that “the acts of the sinful nature are obvious: sexual immorality, impurity and debauchery; idolatry and witchcraft; hatred, discord, jealousy, fits of rage, selfish ambition, dissensions, factions, and envy; drunkenness, orgies, and the like” (Galatians 5:19-21). Paul’s list of vices indicates that several types of “sexual immorality” are serious sins, alongside others. There is also a description of God’s final condemnation at the day of divine judgement for those who are “sexually immoral” (Revelation 21:8).
30. ***Integral to Christian faith:*** The biblical view about the morality of sexual conduct is integral to Christian faith for two main reasons. First, on account of its basis and source in the authoritative texts of Scripture in both Old and New Testaments, and second, due to their centrality to the Bible’s moral account of proper conduct.
31. The Bible’s teaching from its first book, Genesis, to its last book, Revelation, is fully consistent and unwavering that sexual conduct is only morally appropriate within the boundaries of male-female marital union. In addition, the Bible’s presentation of sexual morality is grounded in its central theological convictions about creation, God’s

² Richard B. Hays, *The Moral Vision of the New Testament: A Contemporary Introduction to New Testament Ethics* (San Francisco: Harper San Francisco, 1996), 383.

purposes, sin, and holiness. Sexuality fidelity is an issue that is related directly to key Christian doctrinal concerns and practices. Sexuality is never presented as a matter for freedom of individual choice without regard for God's revealed standards. It is always presented as a matter of moral accountability before God and judgment according to righteous divine standards.

32. Within historic Christianity, sexual behaviour is viewed as an expression of one's fundamental loyalty or disloyalty to God, one's obedience or disobedience to God's moral law, which is a matter of ultimate importance in Christian faith. In theological terms, it is impossible to disconnect the practice of Christian faith from the expectation of personal obedience to God's standards for sexual conduct.

3. Please explain what is meant by evangelical Christianity in contemporary Canada.

33. The term "evangelical" is derived from an important term in the original Greek text of the New Testament, *euangelion*, which simply means "good news" or "gospel." The group of people who identify themselves as evangelical Christians have been proud to associate themselves with the proclamation of the Gospel as the central message of Christianity—salvation through personal trust in Jesus Christ.
34. Evangelical Christianity is often explained in two different ways: historically and theologically. A comprehensive recent definition by Timothy Larsen brings together both historical and theological dimensions into a single statement. According to Larsen, "an evangelical is: 1) An orthodox Protestant; 2) who stands in the tradition of the global Christian networks arising from the eighteenth-century revival movements associated with John Wesley and John Whitefield; 3) who has a preeminent place for the Bible in her or his Christian life as the divinely inspired, final authority in matters of faith and practice; 4) who stresses reconciliation with God through the atoning work of Jesus Christ on the cross; 5) and who stresses the work of the Holy Spirit in the life of an individual to bring about conversion and an ongoing life of fellowship with God and

service to God and others, including the duty of all believers to participate in the task of proclaiming the gospel to all people.”³

35. This definition is an accurate description of the origins and distinctive beliefs of evangelical Christians worldwide, including in contemporary Canada. According to historian John Stackhouse’s study of major forces in the Canadian evangelical movement, three main concerns—doctrinal orthodoxy, personal piety, and evangelism—are interwoven in evangelical life.⁴

Historical factors

36. The Christian religion worldwide is expressed through three main branches of a common faith: Roman Catholicism, Protestantism, and Eastern Orthodoxy. These faith communities share many common beliefs and practices, including core or primary beliefs such as that the world is God’s creation, that Jesus Christ is the divine Son of God whose death and resurrection brings salvation from sin, and that Christians should engage in central practices of piety such as prayer and worship addressed to God. Beyond a set of shared core convictions, each of these communities has its own cluster of distinguishing secondary doctrines, specific areas of emphasis in their communal life, and particular practices that are deemed to be central to living the Christian life.
37. Evangelical Christianity is a subset of the Protestant Christian community that arose in the eighteenth-century in Europe and in North America as a reform and renewal movement seeking to purify the church’s teaching and witness. As a segment of the wider Christian community, evangelicalism is best understood as a self-conscious network forming a like-minded movement within Christianity made up of many different Protestant denominations. It is a broad coalition of individuals, churches and ministries

³ Timothy Larsen, “Defining and locating evangelicalism,” in *The Cambridge Companion to Evangelical Theology*, eds. Timothy Larsen and Daniel J. Treier (New York: Cambridge University Press, 2007), p. 1.

⁴ John G. Stackhouse, Jr., *Canadian Evangelicalism in the Twentieth Century: An Introduction to Its Character* (Toronto: University of Toronto Press, 1993), 181.

that share a common vision of what it means to bear witness to the truth and power of the Gospel of Jesus Christ.

38. Within Canada, this multi-denominational coalition is represented by a national umbrella organization, the Evangelical Fellowship of Canada (EFC), which has 40 affiliated denominations and 35 affiliated educational institutions. EFC's magazine, *Faith Today*, is the most widely representative publication serving as a voice for the viewpoints and concerns of Canadian evangelicals.
39. The leading evangelical denominations in Canada include Associated Gospel Churches, Pentecostal Assemblies of Canada, Evangelical Free Church, Fellowship of Evangelical Baptists, Baptist Union of Western Canada, Christian and Missionary Alliance, Salvation Army, Christian Reformed Church, Free Methodist Church, and Mennonite Church Canada. It is estimated that approximately 11-12% of the Canadian population is associated with communities reflecting evangelical Christian beliefs and practices.⁵

Theological factors

40. With regard to the content of what evangelical Christians believe, it is best to see evangelicalism as a subset of doctrinally orthodox Christianity. While evangelicals affirm what is commonly affirmed by orthodox Christians of every tradition, there are certain emphases which play a critical role in their expression of Christian faith. What distinguishes evangelicals as a subset or "type" of Christian community is a cluster of distinctive theological emphases.
41. According to historian George Marsden, these characteristic evangelical beliefs include:
“(1) the Reformation doctrine of the final authority of the Bible, (2) the real historical

⁵ George A. Rawlyk, *Is Jesus Your Personal Saviour?: In Search of Canadian Evangelicalism in the 1990's* (Montreal: McGill-Queen's University Press, 1996), 118; Aileen Van Ginkel, "Evangelical Beliefs and Practices: A Summary of the 2003 Ipsos-Reid Survey Results," *Church and Faith Trends* (December 2003), 1. Church and Faith Trends is published by the Evangelical Fellowship of Canada's Centre for Research on Canadian Evangelicalism.

character of God's saving work recorded in Scripture, (3) salvation to eternal life based on the redemptive work of Christ, (4) the importance of evangelism and missions, and (5) the importance of a spiritually transformed life."⁶

4. What is the current evangelical Christian view of marriage? On what religious or theological basis was this view held and what is its religious significance within current evangelical Christian faith?

42. The predominant contemporary evangelical Christian view of marriage is consistent with the historic church's belief that marriage is defined as a mutual, exclusive, lifelong covenantal union of male and female (husband and wife). Evangelicals uphold the historic view of marriage championed by enduring Christian tradition on the basis of the biblical and theological reasoning that has so strongly dominated the church's teaching. On this topic, evangelicals are not innovative, but are clearly traditionalist. In many leading Canadian evangelical churches and organizations, there is a strong resistance to the notion that cultural or social trends about personal or sexual morality should be prompt revisions to the church's teaching, since divine revelation is the basis of their moral understanding.

5. What is the current evangelical Christian view on the morality of sexual intimacy: (a) outside of opposite sex marriage; and (b) between persons of the same gender? On what religious or theological basis is this view held and is it integral to current evangelical Christian faith?

43. ***(A) Sexual intimacy outside of opposite sex marriage:*** Current evangelical Christianity views sexual intimacy outside of opposite sex marriage as morally unacceptable conduct. The teaching of Scripture forbids not only extra-marital sex, but non-marital, consensual sexual intimacy. The Greek term *porneia* used in the New Testament, typically rendered as "sexual immorality" in contemporary translations, refers not only prostitution and

⁶ George Marsden, *Understanding Fundamentalism and Evangelicalism* (Grand Rapids: Eerdmans, 1991), p. 4-5.

adultery, but also to premarital sex.⁷ The Bible's rejection of promiscuous sexual expression is found in many passages that affirm the importance of holiness for God's people (e.g., 1 Thessalonians 4:3-5). Also, the apostle Paul in 1 Corinthians 7:1-5 provides moral guidance to a congregation living in the context of temple prostitution. "Since there is so much immorality (*porneia*), each man should have his own wife," he writes (1 Cor. 7:2). The clear implication is that sexual intimacy outside of opposite sex marriage is understood to be sexual immorality. The moral norm of the Bible is upheld by current evangelical Christianity which teaches the requirement of abstinence before marriage, a tenet applied equally to those with heterosexual and homosexual preferences.

44. **(B) Sexual intimacy between persons of the same gender:** Current evangelical Christianity views sexual intimacy between persons of the same gender as morally unacceptable conduct. It rejects the notion that same-sex genital expression is acceptable under any circumstances. Evangelical Christianity does so on the basis of the Bible's authoritative teaching. The Bible does not have the category of "sexual orientation" which is common in current discussion of sexual morality, and does not provide a moral evaluation of inclinations. The focus of the Bible is upon the moral evaluation of behaviour or conduct, not sexual preference. A person's motives for same-sex genital activity are "not treated as a morally significant factor."⁸ The Bible explicitly prohibits sexual intimacy between persons of the same gender. "Though only a few biblical texts speak of homoerotic activity, all that do mention it express unqualified disapproval."⁹ There is no positive, approved example in Scripture of sexual activity between persons of the same gender.
45. In the Old Testament, homosexual intercourse is called an "abomination" (Leviticus 18:22; 20:13), which means an action that is detestable in God's sight. Homosexual acts are included in the lists of sinful sexual conduct in Leviticus 18 and 20. In the New Testament, there are passages which provide negative moral assessment of homosexual

⁷ James H. Moulton and George Milligan, *The Vocabulary of the Greek New Testament Illustrated from the Papyri and Other Non-Literary Sources* (Grand Rapids: Eerdmans, 1930), 529.

⁸ Hays, 381.

⁹ Hays, 389.

conduct. In 1 Corinthians 6:9 and 1 Timothy 1:10, for example, persons who engage in same-sex intimacy are listed with those whose actions are unacceptable to God. The most important, longest and most thorough text in all of Scripture regarding the moral evaluation of same-sex acts is found in Romans 1:18-32. The moral disapproval of homosexual activity is categorical. It is also noteworthy that this rejection is expressed in a theologically oriented section of the apostle Paul's famous doctrinally focused letter. The passage refers to both male-male and female-female forms of sexual intimacy, and both forms are prohibited. Paul's teaching in this section evaluates homosexual conduct from the standpoint of God's purposes in creation. Same-sex relations are contrary to God's design of creation, and thus are called "contrary to nature." According to Romans, homosexual intimacy is a sign of humankind's rebellion against God, and denial of the "natural" (meaning God-given) patterns of sexual relationship. Homosexual activity is not depicted as a provocation of God's wrath, but as a consequence of God's decision to "give up" rebellious creatures to follow their own futile thinking and desires. The text speaks of "exchanging natural desires for unnatural," which is interpreted in evangelical Christianity to mean defaulting from the male-female relationships which reflect the true "nature" of God's created order, and replacing those with male-male or female-female sexual relations which are "unnatural" in the sense of being contrary to God's design in creation. The concept of male-female sexual complementarity found in Genesis 1-2 continues to provide the moral framework for evaluation of same-sex acts.

46. On the basis of biblical texts such as these, evangelical Christianity concludes that "marriage between man and woman is the normative form for human sexual fulfillment, and homosexuality is one among many tragic signs that we are a broken people, alienated from God's loving purpose."¹⁰

6. *What does current evangelical Christianity teach about the status of persons who may engage in homosexual sex or enter into a same-sex marriage? What does current evangelical Christianity teach about how such persons should be treated?*

¹⁰ Hays, 400.

47. *Status of people who may engage in homosexual sex or enter into a same-sex marriage:* According to current evangelical Christianity, individuals who engage in homosexual sexual acts have violated God's revealed standard for sexual conduct. Accordingly, they are considered to have sinned against God. This belief is held within the view that all humanity has sinned and fallen short of God's standards (Romans 3:23). Sexual sins are no worse than other types of sin, such as greed or gossip. Evangelical Christians hold that everyone needs God's forgiveness for their conduct, even those people considered 'saints' by the Christian tradition. There is no biblical basis for thinking that homosexuality is a worse offense than other types of sinful conduct; heterosexuality impurity and promiscuity is just as displeasing to God as homosexual impurity and promiscuity.
48. According to current evangelical Christianity, persons who enter into same-sex marriages have chosen a form of relationship that is not consistent with God's standards for human relationships. Evangelical Christianity does not recognize the theological or spiritual legitimacy of same-sex marriage. The Bible provides no basis for thinking that same-sex marriages can serve as appropriate expressions of God's design for marriage. Accordingly, evangelical Christianity holds the view that such persons are engaging in a sinful form of life which rejects God's approved pattern for relationships.
49. According to current evangelical Christianity, persons who engage in homosexual acts and those who enter into same-sex marriages are called to confess their sin, repent of their chosen ways, and amend their lives to uphold the biblical standard of conduct. From the standpoint of evangelical Christian theology, sexual sins of these kinds are no better, and no worse, than other forms of sinful conduct. As shown by the vice lists recorded in the New Testament, sexual sins are not elevated to a unique status as particular offensive to God, nor are they presented as lesser matters that are indifferent to God.
50. *Treatment of gays, lesbians, bisexual and transgendered persons ("LGBT"):* Evangelical Christianity upholds the Bible's teaching that every human being is a person made by God and loved by God. All human beings, apart from their religious beliefs, are bearers of the image of God (Genesis 1:26-28), which has been understood to imply that

they have an intrinsic dignity that demands respect. In addition, evangelicals believe that every Christian has an obligation to love God and to love their neighbour as themselves (Matthew 22:34-40). This verse often is called the Great Commandment. In addition, evangelicals seek to live out the so-called Golden Rule, in which Jesus teaches, “Do to others what you want them to do to you” (Matthew 7:12).

51. Accordingly, evangelical Christianity teaches that those who self-identify as gay, lesbian, bisexual or transgendered should be treated by Christians as those whom God loves, and as neighbours whom they are called by God to treat with kindness, respect, compassion and love. Christians are to express unconditional love and concern for LGBT persons as fellow human beings. Evangelicals are encouraged to build friendships with LGBT persons that express Jesus’ love for them and which have the potential to overcome mutually unhelpful stereotypes and misperceptions. In particular, evangelical Christians are called to humble themselves by serving LGBT people with generosity of spirit, which starts with listening with genuine interest to their stories about their life experiences rather than condemning them for their lifestyle choices.
52. Self-righteous attitudes by Christians are unacceptable. Compassion, concern and friendship with LGBT people does not depend upon agreement about the moral issues surrounding same-sex relationships. There is no biblical or theological rationale that would justify Christians engaging in any form of verbal or physical mistreatment of gay people. What is sometimes called “homophobic” behaviour by Christians (e.g., fear or hatred of LGBT that is expressed with hostility) has no basis in Christian doctrine and is rejected by evangelical Christians. It is the view of many evangelical Christians that such compassionate service and ongoing friendship as expressions of pastoral concern and love is morally consistent with holding the theological view that LGBT relationships are less than God’s best for the individuals.

7. Do the TWU Statement of Faith and Community Covenant generally conform with widely held current evangelical Christian beliefs?

53. Yes. Both documents conform fully to historic and contemporary evangelical Christian theological convictions.

54. ***TWU's Statement of Faith:*** The statement follows the standard outline for evangelical confessional summaries commonly used by evangelical churches, denominations, ministries and educational institutions. Its content is entirely consistent with evangelical theological convictions. From a theological standpoint, the TWU statement reflects the consensus evangelical viewpoints on a number of theological matters that mark out evangelical beliefs from other theological stands within Christianity. Each of its 10 individual tenets reflect deep-seated convictions of evangelical theology. Nothing is stated that would be unexpected for an evangelical doctrinal summary, and nothing would be seen to be innovative or unusual for such a statement. Rather, the statement is a clear, thorough expression of a distinctly evangelical approach to Christian theology. Its evangelical identity is evident in several ways, of which I will mention three examples.
55. First, the TWU statement in #2 regarding the authoritative revelation of God in the Bible includes an affirmation that Scripture is "without error in the original writings." This view historically has been a central conviction of evangelical theology. Leading evangelical scholars, denominations and ministries have endorsed this belief without hesitation. It is important to understand that, while other non-evangelical Christian communities standardly would also affirm the ultimate authority of the Bible, it is only evangelical Christians who have emphasized the "inerrant" nature of the Bible, as does TWU by affirming them to be "without error in the original writings." Any theologian would recognize that statement as a classical tenet of evangelical Protestant theology. The implication of this belief is that human beings are held accountable by God to the moral standards taught in the Bible. Human beings are not at liberty to dissent from God's revealed truth regarding any area of human conduct, including sexuality.
56. Second, TWU's emphasis in #5 upon the significance of the Cross of Jesus Christ is stated in a distinctively evangelical manner, in two respects. The evangelical Christian theological tradition has placed strong emphasis on Christ's role as "substitute" for human sins, paying the penalty that humans deserved, so that they can be acquitted of their guilt. The theological framework of evangelical belief about the basis of salvation in what theologians call a "penal substitutionary view of the atonement" is found clearly in

the TWU statement. In addition, the statement's affirmation that Christ's cross is the "perfect, all-sufficient sacrifice for our sins" which constitutes "the only ground of salvation" is worded in a manner that reflects the traditional evangelical Protestant concern to teach that salvation is achieved solely on the basis of what Christ does on the cross, and therefore that human works or good deeds do not contribute anything to the basis of salvation. This position distinguishes evangelical Protestants from traditional Roman Catholic doctrine.

57. Third, TWU's statement in #8 reflects a clearly evangelical Christian way of expressing the nature of the Christian life. The categories of "Christ-like living and witness to the world" are hallmark phrases of evangelical piety. In particular, the statement that "[i]n obedience to Christ's commission, we are to make disciples among all people, always bearing witness to the gospel in word and deed" expresses the evangelical emphasis on evangelistic and missionary activity. The "commission" being referenced in TWU's wording is the so-called "Great Commission" found in the New Testament in Matthew chapter 28, verses 16 to 20, where Jesus states, "Go and make disciples of all nations, baptizing them in the name of the Father and of the Son and of the Holy Spirit, and teaching them to obey everything I have commanded you." TWU's statement reflects historic and contemporary evangelical beliefs and practices about the central importance of "witness" for Christian disciples.
58. ***Community Covenant:*** The entire document is consistent with contemporary evangelical beliefs and practices related to personal and communal morality. From the standpoint of evangelical Christian theology, the covenant reflects core teachings in a clear and succinct manner. Nothing is included in the statement that is marginal to evangelical moral concerns. Rather, the community covenant reflects both historic patterns of evangelical practice and widely accepted contemporary evangelical theological convictions.
59. It is important to notice that the covenant is explicitly based on biblical teachings. This reflects the evangelical theological emphasis on the central of the authority of the Bible in all matters of human life. The covenant's specific requirements are consonant with what

any evangelical theologian would expect, given the affirmation of the authority and inerrancy of the Bible in TWU's statement of faith. The covenant makes no attempt to generate moral norms for the community simply through arguments from human reason nor from arguments based on historic evangelical practices. Instead it appeals repeatedly to the Bible's own teachings. It attempts to do nothing more than organize the Bible's directions about how to live as a Christian with regard to many aspects of daily life as individuals and as members of a shared community. The references in the footnotes to specific texts of the Old and New Testaments indicate the covenant's confident reliance upon the original source of authority for evangelical moral teachings. This is the typical manner in which evangelical moral teachings have been communicated.

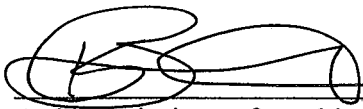
60. In addition, it is important to notice that the covenant's requirement for sexual conduct also reflects widely accepted contemporary evangelical teachings. The covenant requires members of the TWU community to "observe modesty, purity and appropriate intimacy in all relationships, reserve sexual expressions of intimacy for marriage, and within marriage take every reasonable step to resolve conflict and avoid divorce."

8. Do evangelical Christian communities typically ask their members to abstain from sexual intimacy outside of opposite sex marriage?

61. Yes. Policies of denominations, congregations, missionary organizations or educational institutions which require sexual intimacy to be reserved for marriage between one man and one woman are common, and should be considered to be fully consistent with the long-established and routinely expressed expectations for evangelical Christian

communities. Differing types of communities within the network of evangelical Christianity traditionally have upheld, and continue to uphold, the moral standard of abstinence or celibacy as the only morally acceptable alternative to sexual intimacy within marriage between a man and a woman.

SWORN BEFORE ME at the City of)
 Vancouver, in the Province of British)
 Columbia, this 28th day of July, 2014.)



A Commissioner for taking Affidavits within)
 British Columbia)



JEFFREY GREENMAN

Kevin L. Boonstra
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This is Exhibit "A" referred to in the Affidavit of Dr. Jeffrey P. Greenman sworn/affirmed before me at Vancouver, British Columbia, this 28th day of July, 2014.

A handwritten signature in black ink, consisting of a large, stylized 'B' followed by a horizontal line extending to the right.

A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE PROVINCE OF BRITISH COLUMBIA

CURRICULUM VITAE JEFFREY P. GREENMAN

EDUCATION

Ph.D., University of Virginia, 1998 (Religious Ethics)

Dissertation: *"Conscience and Contentment: A Reassessment of Seventeenth-Century Anglican Practical Divinity."* Supervisor: James F. Childress

M.A., University of Oxford, 1990; B.A. (Hons), 1986 (Philosophy, Politics & Economics)

M.Div., Regent College, Vancouver, B.C., 1988 (Divinity)

B.A., Albion College, Michigan, 1981 (Philosophy, *summa cum laude*)

CURRENT POSITION

Academic Dean and Associate Professor of Theology and Ethics, Regent College, Vancouver, BC, Canada (July 2013-present).

ADMINISTRATIVE ASSIGNMENTS AT REGENT COLLEGE

Executive Vice President, January 2014-

President's Cabinet, 2013

Transition Cabinet, Chair, 2014-

Academic Planning Committee, Chair, 2013-

Crux Committee, Chair, 2013-

Chinese Studies Committee, member, 2013-

Distance Education Committee, Chair, 2013-

CURRENT RESEARCH

Martin Luther and William Tyndale as Interpreters of the Sermon on the Mount

PUBLICATIONS

- **Books**

Jeffrey P. Greenman, Read Schuchardt & Noah Toly, *Understanding Jacques Ellul* (Eugene, OR: Cascade, 2012). 174 pages.

Jeffrey P. Greenman, *The Lord's Prayer* (Bamcote, UK: Grove Books Ltd., 2012). 26 pages.

Jeffrey P. Greenman & George Sumner, *Unwearied Praises: Exploring Christian Faith through Classic Hymns* (Toronto: Clements, 2004). 194 pages.

- **Edited books**

Jeffrey P. Greenman & Timothy Larsen, eds., *The Decalogue through the Centuries: From the Hebrew Scriptures to Benedict XVI* (Louisville: Westminster John Knox Press, 2012).

Jeffrey P. Greenman & Gene L. Green, eds., *Global Theology in Evangelical Perspective: Exploring the Contextual Nature of Theology and Mission* (Downers Grove: InterVarsity Press, 2012).

Jeffrey P. Greenman & George Kalantzis, eds., *Life in the Spirit: Spiritual Formation in Theological Perspective* (Downers Grove, IL: InterVarsity Press, 2010).

Jeffrey P. Greenman & Mark Husbands, eds., *Ancient Faith for the Church's Future* (Downers Grove, IL: InterVarsity Press, 2008).

Jeffrey P. Greenman, Timothy Larsen & Stephen R. Spencer, eds., *The Sermon on the Mount through the Centuries: From the Early Church to John Paul II* (Grand Rapids: Brazos, 2007).

Jeffrey P. Greenman & Timothy Larsen, eds., *Reading Romans through the Centuries: From the Early Church to Karl Barth* (Grand Rapids: Brazos, 2005).

Jeffrey P. Greenman & John Kessler, eds., *Teach Me Your Paths: Studies in Old Testament Literature and Theology* (Toronto: Clements, 2001).

- **Scholarly articles or chapters in books**

"Head, Heart and Hands" in Festschrift for W. Ward Gasque (forthcoming).

"Stanley Hauerwas", "Luther's Catechisms", "Moral Philosophy," "Christian Liberal Arts Colleges/Universities", and "Langham Partnership" in *Encyclopedia of Christian Education* (Lanham, MD: Scarecrow Press, expected publication 2014).

"The Priority of Leadership Training in Global Mission" (with Gene L. Green) in *Evangelical Missions Quarterly* 50/4 (Winter 2014): 44-49.

"Ellul in Text and Textbook," *Ellul Forum* 50 (Fall 2012), 12.

"Lancelot Andrewes," in *The Decalogue through the Centuries: From the Hebrew Scriptures to Benedict XVI* (Louisville: Westminster John Knox Press, 2012): 149-167.

"Faithful Christian Learning: The Liberal Arts in Light of the Great Commandment," in *Liberal Arts for the Christian Life*, eds. Philip Ryken & Jeffry Davis (Wheaton, IL: Crossway, 2012): 81-89.

"Anglican Evangelicals on Personal and Social Ethics," *Anglican Theological Review* 94/2 (Spring 2012): 179-205.

"Learning and Teaching Global Theologies," in *Global Theology in Evangelical Perspective: Exploring the Contextual Nature of Theology and Mission*, eds. Jeffrey P. Greenman & Gene Green (Downers Grove: InterVarsity Press, 2012), 237-252.

"Cardinal Virtues", "Courage", "Prudence", and "Seven Deadly Sins" in *Dictionary of Scripture and Ethics*, eds. Joel Green, Jacqueline Lapsely, Rebekah Miles & Allen Verhey (Grand Rapids: Baker, 2012): 120-121, 180-182, 643-644, 717-718.

"Encountering Jacques Ellul on His Own Terms" (with Noah Toly & Read Schuchardt) *Ellul Forum* 45 (Spring 2010): 3-10.

"Spiritual Formation in Theological Perspective: Classic Issues, Contemporary Challenges" in *Life in the Spirit: Spiritual Formation in Theological Perspective*, eds. Jeffrey P. Greenman & George Kalantzis (Downers Grove, IL: InterVarsity Press, 2010): 23-35.

"Introduction" in *Life in the Spirit: Spiritual Formation in Theological Perspective*, eds. Jeffrey P. Greenman & George Kalantzis (Downers Grove, IL: InterVarsity Press, 2010): 9-20.

"Mission as the Integrating Center of Theological Education," in *The Bible in World Christian Perspective: Studies in Honor of Carl Edwin Armerding*, eds. David W. Baker and W. Ward Gasque (Vancouver, BC: Regent College Publishing, 2009), 193-210.

"John R.W. Stott," in *The Sermon on the Mount through the Centuries*, eds. Jeffrey P. Greenman, Timothy Larsen & Stephen R. Spencer (Grand Rapids: Brazos, 2007), 245-280.

"William Tyndale," in *Reading Romans*, ed. Jeffrey P. Greenman & Timothy Larsen (Grand Rapids: Brazos Press, 2005), 121-136.

"Stott, John R.W." in *Biographical Dictionary of Evangelicals*, ed. Timothy Larsen (Leicester: Inter-Varsity Press, 2003): 638-641.

5

"Packer, James Innell," in *Biographical Dictionary of Evangelicals*, ed. Timothy Larsen (Leicester: Inter-Varsity Press, 2003): 497-501.

"Spirituality and Public Character: A Qualitative Cross-Sectional Study of Master of Divinity Students in Toronto," (with Yau Man Siew), *Christian Education Journal* 6 NS/2 (Fall 2002): 119-137. [Reprint of previously published article.]

"Spirituality and Public Character: A Qualitative Cross-Sectional Study of Master of Divinity Students in Toronto," (with Yau Man Siew), *Theological Education* 38/1 (2001): 1-20.

"An Approach to Workplace Ministry for Christian Physicians," *Crux* 37/2 (2001): 13-21.

"The Significance of Scripture in Christian Formation" in *Teach Me Your Paths: Studies in Old Testament Literature and Theology*, eds. John Kessler & Jeffrey P. Greenman (Toronto: Clements Publishing, 2001): 193-217.

"The Public Character of Theological Education: An Evangelical Perspective" (with David Jones & Christine Pohl), *Theological Education* 37/1 (Autumn 2000): 1-15.

"What is Medical Ethics? The Inadequacies of a Common Approach and A Promising Alternative" *BioLaw*, vol. II, no. 5 (June 1995): S41-47.

"Recent Work on Religion and Bioethics: A Review Article" (with Scott A. Giles) *BioLaw*, vol. II, no. 7-8 (July-August 1994): S151-160.

"*Veritatis Splendor* And/As Evangelical Ethics" *Crux* 30/2 (June 1994): 17-26.

- **Book Reviews in scholarly publications**

Review of Robin W. Lovin, *Christian Realism and the New Realities* (Cambridge University Press, 2008), *Journal of Church and State* (forthcoming).

Review of Tom Wright, *How God became King* (SPCK, 2012), in *Theology* 116/2 (March/April 2013): 135-136.

Review of Robert Benne and Michael Shahan. *A Report from the Front Lines: Conversations on Public Theology: a Festschrift in Honor of Robert Benne* (Grand Rapids: Eerdmans, 2009). *Journal of the Society of Christian Ethics* 32/1 (2012): 206-209.

Review of Catherine Ross & Jane Dunphy, *Strategies for Teaching Assistant and International Teaching Assistant Development: Beyond Micro Teaching* (Jossey-Bass, 2007), *Teaching Theology & Religion* 12/3 (2009): 300-301.

Review of Duncan B. Forrester *Theological Fragments* (T & T Clark, 2005), *Journal of the Society of Christian Ethics*, 28/1 (Spring/Summer 2008): 255-257.

Review of Reginald Bibby, *Restless Churches: How Canada's Churches Can Contribute to the Emerging Religious Renaissance* (Novalis, 2004), *Crux* 43/2 (Summer 2007): 38-40.

Review of Timothy Dudley-Smith, *John Stott: The Making of a Leader* (InterVarsity Press, 1999) and *John Stott: A Global Ministry* (InterVarsity Press, 2001), *Canadian Evangelical Review* 24 (Autumn 2002): 38-40.

Review of Leonard Sweet, *SoulTsunami* (Zondervan, 1999), *Crux* 35/3 (September 1999): 42-44.

Review of Margaret Mohrmann, *Medicine as Ministry* (Pilgrim Press, 1995), *Crux* 32/3 (September 1996): 46-47.

Review of David J. Atkinson, David F. Field, Arthur Holmes and Oliver O'Donovan, eds., *The New Dictionary of Christian Ethics and Pastoral Theology* (InterVarsity Press, 1995), *Crux* 31/2 (June 1995): 55-56.

Review of Alvin F. Kimel, ed., *Speaking the Christian God* (Eerdmans, 1992), *Crux* 29/4 (December 1993): 44-45.

Review of Richard Mouw, *The God Who Commands* (University of Notre Dame Press, 1990), *Crux* 29/1 (March 1993): 45-46.

Review of Carl F.H. Henry, *Christian Countermove in a Decadent Culture* (Multnomah Press, 1986), *Crux* 25/1 (March 1989): 30-31.

- **Bibliography**

"Christian Ethics and Spirituality" published in *The Infography* by Fields of Knowledge, Inc., available through www.infography.com.

- **Semi-popular articles**

"Mentoring 101," *Focus* 24/2 (Christian Medical Dental Society), June 2004: 8-11, 24-25.

"The Good News about Marriage: Neglected Dimensions of Christian Orthodoxy," *Regeneration Quarterly* 1/3 (Summer 1995): 11-13.

- **Short essays on the webpage of Tyndale Centre for Leadership Development**
 - "Bibliography: Work, Vocation and Ministry"

- "Reflections on Missional Bible Study Questions"
- "The Value of Mentoring"
- "A Brief Annotated Bibliography on Leadership"
- "Toward a Definition of Spiritual Formation" (with Donald Goertz)
- "Mission as Focus of Educational Integration at Tyndale Seminary"
- "Equipping Leaders"

SCHOLARLY PRESENTATIONS & LECTURES

"Dying with Dignity? Assisted Suicide," Graduate and Faculty Christian Forum at University of British Columbia, February 5, 2014.

"The Evangelical Basis for Christian Ethics," Daystar University & African International University, Nairobi, Kenya, October 23 & 25, 2012.

"Neuroscience and Theology" at Wheaton/Naperville Chapter of the American Scientific Affiliation, Wheaton College, October 4, 2012.

"The Importance of Global Christianity for Taylor University," Keynote address at Colleagues College, Taylor University, August 23, 2012, with subsequent discussion November 9, 2012.

"Prophet in the Hermeneutical Wilderness: Ellul's Interpretation of Scripture," Centenary Conference on Jacques Ellul, Wheaton, Illinois, July 10, 2012.

"The Ethical Legacy of Jacques Ellul (1912-1994)," Society of Christian Ethics, Washington, D.C., January 7, 2012.

"Anglican Evangelical Ethics," Society of Christian Ethics, Washington, D.C., January 6, 2012.

"Learning and Teaching Global Theology," Keynote lecture at Consultation on Globalizing Theological Education: Developing Pedagogical Practices to Enhance Teaching and Learning in the Multicultural Learning Environment, Carl F.H. Henry Center for Theological Understanding, Trinity International University, July 6, 2011.

"Swimming with the Elephants: A Response to George Kalantzis," *Evangelicals and the Early Church* Conference, Wheaton College, March 19, 2010.

"Bridging the Generational Divide: Understanding, Teaching and Mentoring Millennials," Project Teacher, Wheaton College, February 17, 2010.

"The Priority of Persons: A Response to Andrew Yuengert," *Market Capitalism: Can Godly Values Make the Difference?* Conference, Wheaton College, September 23, 2009.

"Spiritual Formation in Theological Perspective: Classic Issues, Contemporary Challenges," Wheaton Theology Conference, April 16, 2009.

"Lancelot Andrewes as an Interpreter of the Decalogue," *Reading the Decalogue through the Centuries* conference, Wheaton College, November 7, 2008.

"Evangelicals and the Common Good: Peril or Promise?" Wheaton College Humanities Colloquium, January 19, 2007.

"Toward an Evangelical Ethic of the Common Good: Pitfalls and Possibilities," Society of Christian Ethics, Dallas, TX, January 7, 2007.

"Missional Leadership: A Biblical Direction," Scripture Seminar, Trinity Evangelical Divinity School, December 7, 2005.

"John R.W. Stott as an Interpreter of the Sermon on the Mount," *Reading the Sermon on the Mount* conference, Wheaton College, November 5, 2005.

"The Shape of Christian Leadership," Inaugural Lecture, R.J. Bernardo Family Chair of Leadership, Tyndale Seminary, February 10, 2004.

"The Place of Romans in the Theology of William Tyndale," *Reading Romans* conference, University of Toronto, May 29, 2002.

"Where do you live? Engaging our Culture," *New Frontiers, Claiming the Vision* conference, Wycliffe College, Toronto, May 18, 2002.

"Shifting Values? Christian Perspectives on the New Economy's Work Ethic," *Work in Technological Times* conference, Tyndale College & Seminary, November 3, 2001.

"Spirituality and Ethics: Making the Connection," *Second International Spiritual Formation Conference*, Dallas, Texas, May 2001.

"Seven Theses on Spiritual Formation in Colleges and Seminaries," Tyndale College & Seminary Conference, *Exploring a Great Tradition* conference, Toronto, Ontario, November 11, 2000.

"Marriage and Friendship," Society of Christian Ethics, Washington, D.C., January 8, 2000.

"Reassessing Caroline Moral Theology: A Fresh Look at Sanderson, Hall and Taylor," Anglican Theological Ethics Interest Group, Society of Christian Ethics, San Francisco, California, January 8, 1999.

"The Ethics of Everyday Life: Medical Practice as Christian Ministry." Christian Medical & Dental Society, *A Day in Ethics* seminar, Toronto, Ontario, September 20, 1997.

"Jeremy Taylor's View of Friendship." Annual meeting of Scholarly Engagement with Anglican Doctrine (SEAD), Alexandria, Virginia, April 9, 1994.

"Veritatis Splendor: A Protestant Appreciation and Critique." Symposium on Papal Encyclical *Veritatis Splendor*, University of Virginia, Department of Religious Studies, Charlottesville, Virginia, February 11, 1994.

COURSES TAUGHT

- **Regent College**
Christian Thought & Culture I & II
- **Wheaton College**
Theological Ethics
Ten Commandments
Jacques Ellul: Technology, Politics & Ethics
Senior Seminar: Global Christianity
World Christian Perspectives
- **Tyndale Seminary**
Gospel, Church and Culture
Leadership Development
Christian Ethics
Work, Vocation & Ministry
Elements of Christian Spirituality
Integrative Seminar—MTS Modular program
Protestant Spiritual Traditions (coordinator)
Contemporary Theology (coordinator)
Reading Romans (coordinator)
- **Wycliffe College (Toronto School of Theology, University of Toronto)**
Anglican Moral Theology (2002, 2004)
- **Moscow Theological Seminary, Moscow, Russia**
Leadership Development & Mentoring (2012)

THESIS, DISSERTATION AND POST-DOCTORAL SUPERVISION

Second reader for Doctoral Dissertation by Hank Voss, completed April 2013.

Senior Academic Mentor for research and writing by Dr. Sunday Agang, "The Politics of Redemptive Violence and the Mission of the Church," Langham International Research & Training Seminar, June 2011-July 2015.

Second reader for Undergraduate Honors Thesis by Stephen Dunkel, "The Charter of Discipleship," completed July 2010.

ADDITIONAL PROFESSIONAL EXPERIENCE

Co-host, World Christianity Conference, "On the Threshold: World Christianity at our Door", Regent College, Vancouver, B.C., July 19-20, 2013.

Co-convener, "Christian Political Witness," 22nd annual Wheaton Theology Conference, Wheaton College, April 4-6, 2013.

Delegate, International Consultation for Evangelical Theological Education, Nairobi, Kenya, October 15-19, 2012.

Delegate, Consultation on "Gospel, Leadership, and Our Mission in a Global-Urban World," Burnaby, B.C., Canada, July 17-18, 2012.

Delegate, Lausanne Consultation on International Theological Education, Gordon Conwell Theological Seminary, May 29-June 1, 2012.

Co-convener, Langham International Research & Training Seminar, held at Wheaton College, Wheaton, IL, June 13-July 2, 2011.

Co-convener, "Global Theology in Evangelical Perspective," 20th annual Wheaton Theology Conference, Wheaton College, April 7-9, 2011.

External Reviewer, Department of Religion & Philosophy, Roberts Wesleyan College, Rochester, NY, September 28-29, 2010.

Panelist, "Trends in North American Theological Education," International Consultation on Evangelical Theological Education, Sopron, Hungary, October 6, 2009.

Delegate, International Consultation for Evangelical Theological Education, Sopron, Hungary, October 4-10, 2009.

Co-convener, "Life in the Spirit: Exploring Evangelical Spiritual Theology," 18th annual Wheaton Theology Conference, April 16-18, 2009.

Co-convener, McManis Lectures, "Reading the Ten Commandments through the Centuries," Wheaton College, November 6-7, 2008.

Participant, Summer Institute on Experiential Education, Northeastern University, June 27-July 1, 2008.

Member, Visitation/Appraisal Team, Ontario Council on Graduate Studies (conjoint MTS Degree at Conrad Grebel University College & University of Waterloo), February 7-8, 2008.

Co-convener, "Ancient Faith for the Church's Future," 16th annual Wheaton Theology Conference, Wheaton College, April 12-14, 2007.

Delegate, International Consultation for Evangelical Theological Education, Chiang Mai, Thailand, August 7-11, 2006.

Co-convener, "Reading the Sermon on the Mount: Classic Resources for Moral Formation," conference held at Wheaton College, Wheaton, IL, November 3-5, 2005.

Member, Visitation Team, Association of Theological Schools (Taylor Seminary, Edmonton, AB; October 20-23, 2002).

Delegate, "The Future of Anglicanism" consultation, June 28-July 5, 2002, Oxford, England (one of 75 delegates selected worldwide).

Co-Convener, "Reading Romans: Encounters with the Epistle to the Romans through the Centuries," May 28-29, 2002, at the University of Toronto, a special meeting at the Congress of the Social Sciences and Humanities 2002.

Consultant, Resource Session on Draft Legislation on Assisted Human Reproduction, Evangelical Fellowship of Canada, Ottawa, June 1, 2001.

Co-Director (with Dr. Yau-Man Siew), "Spiritual Formation and Public Character" research project, Association of Theological Schools in the United States and Canada, January 2001-January 2002.

Member, Evangelical Study Group, "The Public Character of Theological Education Project," Association of Theological Schools in the United States and Canada, September 1998-October 2000 (one of six members chosen from among evangelicals across the ATS).

MEMBERSHIPS IN PROFESSIONAL ASSOCIATIONS

American Academy of Religion

- Convener, "Missional Hermeneutic Study Group," sponsored by Tyndale Seminary, 2002-2004.
- Program Committee member, "Missional Hermeneutics Study Group," 2005-present.

- 12
- Session Chair, "Mission and Biblical Interpretation: Toward a Missional Hermeneutic," Philadelphia, PA, November 19, 2005.
 - Session Chair, "Toward a Missional Hermeneutic," Chicago, IL, November 1, 2008.

Society of Christian Ethics

- Co-Convener, Anglican Theological Ethics Interest Group, Society of Christian Ethics, January 1997-present.

PREVIOUS EMPLOYMENT AT WHEATON COLLEGE

Associate Dean of Biblical and Theological Studies, and Professor of Christian Ethics, Wheaton College, Wheaton, Illinois, July 2005-June 2013. Responsible for senior academic leadership and administrative management of the Department of Biblical & Theological Studies. This position includes supervision of 25 full-time faculty and oversight of 8 academic programs (including 5 M.A. programs and a Ph.D. program), as well teaching in the areas of Christian theology, ethics and global Christianity.

ADMINISTRATIVE ASSIGNMENTS AT WHEATON COLLEGE

Chair, Committee on Globalization Statement, 2012-2013
 Chair, Ph.D. Committee, 2006-2013
 Chair, Honey Rock Campus Advisory Committee, 2009-2103
 Member, Graduate Dean's Advisory Committee, 2005-2013
 Member, Graduate Structure Task Force, 2009-2013
 Member, HoneyRock Advisory Board, 2007-2013
 Member, Billy Graham Center Scholarship Advisory Committee, 2006-2012
 Member, Billy Graham Center Scholarship Executive Advisory Committee, 2006-2012
 Member, Ten Year Review teams: Philosophy (2007, full review), Psychology (2008, administrative review), Christian Formation & Ministry (2008, administrative review)
 Interdisciplinary Studies (2009, full review)

PREVIOUS EMPLOYMENT AT TYNDALE SEMINARY

R.J. Bernardo Family Chair of Leadership and Director, Tyndale Centre for Leadership Development, Tyndale Seminary, July 2003-June 2005. Responsible for teaching and research in the field of leadership, and for establishing a Centre for Leadership Development that provides theological reflection, scholarly research and continuing education opportunities aimed at leadership development for both congregational leaders and Christians in the workplace.

Vice-President, Academic Dean and Professor of Christian Ethics, Tyndale Seminary, August 1998-June 2003. Responsible for senior academic leadership and administrative

management of Tyndale Seminary, as well teaching in the areas of Christian theology, ethics and spiritual formation. Accomplishments included effective administrative restructuring, renewal of the Seminary's vision and mission, comprehensive curriculum revision, introduction of new degree programs and majors, major revision to the *Faculty Handbook*, introduction of a faculty salary scale, and development of a five-year business plan.

Director, M.T.S. Modular Program, Ontario Theological Seminary/Tyndale Seminary, August 1996-August 1998. Responsible for development, implementation and overall administrative leadership associated with modular delivery system for Masters of Theological Studies degree, as well as teaching in the areas of Christian ethics and spiritual formation.

Director, Doctor of Ministry Program, Ontario Theological Seminary/Tyndale Seminary, March 1997-August 1998. Responsible for overall administrative leadership and ongoing liaison with Fuller Theological Seminary in establishing Tyndale as an extension site in Fuller's Doctor of Ministry program.

MAJOR ASSIGNMENTS AT TYNDALE UNIVERSITY-COLLEGE & SEMINARY

Presidential Cabinet

Member, September 1998-June 2003

Academic & Student Affairs Council

Chair, September 1999-June 2003

Member, September 1998-June 2003

Task Force on University-College Transition

Member, June 1998-April 2000

Academic Council, University-College and Seminary (equivalent of Senate)

Elected member, September 2003-June 2004

Academic Planning Committee, Seminary

Member, September 1997-June 2003

Theology Department, Seminary

Member, September 1996-June 2005

Acting Chair, September 1999-June 2003

Chair, July 2003-August 2004

Formation Department, Seminary

Member, September 2004-June 2005

ADDITIONAL WORK EXPERIENCE

Executive Director, African Enterprise (Canada), July 1988-July 1991. Established a support office for the ministry of African Enterprise, a transdenominational Christian mission organization, and provided organizational leadership in building its constituency

14

through fundraising, publication of regular newsletters and other promotional documents, public speaking and preaching.

Assistant to the Principal, Regent College, September 1986-May 1988. Provided administrative support to the Principal, including involvement with organizational strategy, student recruitment, fundraising, and faculty recruitment. Participated in academic planning, curriculum revision and program development as student delegate to Academic Senate.

Lay Assistant, St. John's (Shaughnessy) Anglican Church, Vancouver, BC, September 1986-June 1991. Served as pastoral leader for a ministry team serving a growing evening congregation. Provided overall organizational direction, planning, worship leadership, pastoral care and regular preaching.

Juvenile Justice Specialist, Aspen Systems Corporation, Rockville, MD, September 1984-June 1985. Managed expert consultant resources for Aspen's contract with the U.S. Department of Justice. Supervised the development of an automated computer file for project support. Principal author of "Eighth Analysis and Evaluation of Federal Juvenile Delinquency Programs" and other documents for the Office of Juvenile Justice.

Program Specialist, Washington Consulting Group, Washington, DC, July 1984-August 1984. Managed a pool of consulting resources of national experts in juvenile justice. Assisted in writing and editing program documents used by U.S. Department of Justice.

Expert Consultant, U.S. Department of Education, Washington, DC, February-July 1984. Served as expert consultant for the design and implementation of a national framework for data collection by the Department and White House during the national year of private sector initiatives in education. As required by ranking Department officials, wrote articles and speeches on educational issues. Acted as liaison to major education associations.

Research Analyst, Public Sector Consultants, Lansing, MI, June-September 1981. Served as health education consultant to the New England College of Osteopathic Medicine. Prepared \$1 million grant proposal to the U.S. Department of Health and Human Services for postgraduate medical training at five hospitals in New England.

Michigan Fundraising Coordinator, National Unity Campaign for John B. Anderson, Lansing, MI, May-November 1980. Developed and implemented comprehensive fundraising strategy for Anderson's Presidential campaign. Responsible for statewide compliance with federal election laws and coordination of national projects in Michigan.

Research Assistant, Center for Philosophy & Public Policy, University of Maryland, January-June 1980. Assisted with ongoing research on moral aspects of U.S. immigration and energy policies. Edited manuscripts for publication by economists and philosophers.

MAJOR VOLUNTEER & CHURCH SERVICE

Member, Board, International Jacques Ellul Society, January 2011-present.

Member, Board of Trustees, Northern Seminary (Lombard, IL), October 2010-February 2014.

- Member, Campus Development Task Force, 2011-2014
- Member, Theology Search Committee, 2011
- Member, New Testament Search Committee, 2011

Member, Worship Planning Team, First Baptist Church of Wheaton, September 2006-2011.

Member, Education Committee, First Baptist Church of Wheaton, September 2006-2011.

Member, Board of Trustees, Langham Partnership Canada, October 2000-June 2005; September 2014-.

- Chair, June 2003-June 2005.

Member, Teaching Council, Forest Brook Community Church, Pickering, Ontario, 2004-2005.

Member, Preaching Team, St. Paul's on the Hill (Anglican) Church, Pickering, Ontario, 1996-2003.

AWARDS & HONOURS

Listed in *Canadian Who's Who*, 2001 edition (University of Toronto Press)

University of Virginia

Davidge Fellowship of the Graduate School of Arts and Sciences, 1994-1996.

Regent College

Prize for student making most significant contribution to the Regent College community, 1987.

Albion College

Phi Beta Kappa, 1981.

Senior Writing Prize, 1981.

Lomas Project 250 Leadership Award, 1980.

Mortar Board, Leadership Honorary (Chapter President).

Tyndale College & Seminary

Faculty Excellence Award for Leadership, 2005

PERSONAL DATA

Home address: 3351 Trutch Ave, Richmond, BC V7C 5W8 Canada

Telephone: 604-328-9597

Dual citizenship: United States of America & Canada

Married to Janet Elizabeth Greenman (m. June 4, 1988)

Children: Emily Louise (b. January 25, 1993); Andrew James (b. January 27, 1995)

Updated February 2014

This is Exhibit "B" referred to in the Affidavit of Dr. Jeffrey P. Greenman sworn/affirmed before me at Vancouver, British Columbia, this 28th day of July, 2014.

A handwritten signature in black ink, appearing to be "B. O.", written over a horizontal line.

A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE PROVINCE OF BRITISH COLUMBIA

Bibliography

Gagnon, Robert A.J. *The Bible and Homosexual Practice: Texts and Hermeneutics*. Nashville, TN: Abingdon Press, 2001.

Grenz, Stanley. *Sexual Ethics: A Biblical Perspective*. Dallas, TX: Word Publishing, 1990.

Grenz, Stanley J. *Welcoming But Not Affirming: An Evangelical Response to Homosexuality*. Louisville, KY: Westminster John Knox Press, 1998.

Hays, Richard B. *The Moral Vision of the New Testament: A Contemporary Introduction to New Testament Ethics*. San Francisco: Harper San Francisco, 1996.

Heimbach, Daniel R. *True Sexual Morality: Recovering Biblical Standards for a Culture in Crisis*. Wheaton, IL: Crossway Books, 2004.

Hollinger, Dennis P. *The Meaning of Sex: Christian Ethics and the Moral Life*. Grand Rapids, MI: Baker Academic, 2009.

Larsen, Timothy & Daniel J. Treier, editors. *The Cambridge Companion to Evangelical Theology*. New York: Cambridge University Press, 2007.

Marsden, George M. *Understanding Fundamentalism and Evangelicalism*. Grand Rapids, MI: Eerdmans, 1991.

Noll, Mark A. *The Rise of Evangelicalism: The Age of Edwards, Whitefield and the Wesleys*. Downers Grove, IL: InterVarsity Press, 2003.

Rae, Scott B. *Moral Choices: An Introduction to Ethics*. Grand Rapids, MI: Zondervan, 1995.

Rawlyk, G.A., editor. *Aspects of the Canadian Evangelical Experience*. Montreal: McGill-Queen's University Press, 1997.

Rawlyk, G.A. *Is Jesus Your Personal Saviour? In Search of Canadian Evangelicalism in the 1990's*. Montreal: McGill-Queen's University Press, 1996.

Stackhouse, Jr., John G. *Canadian Evangelicalism in the Twentieth Century: An Introduction to Its Character*. Toronto: University of Toronto Press, 1993.

Stassen, Glen H. & David P. Gushee. *Kingdom Ethics: Following Jesus in Contemporary Context*. Downers Grove, IL: InterVarsity Press, 2003.

Stott, John. *New Issues Facing Christians Today*. Fully revised edition. Grand Rapids, MI: Zondervan, 1999.

Wright, David F. "Homosexuality: The Relevance of the Bible," *Evangelical Quarterly* 61:4 (1989), 291-300.



This is the 1st Affidavit
of Samuel H. Reimer in this case
and was made on 11 July 2014

No. S-142908
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TREVOR LOKE

PETITIONER

AND:

MINISTER OF ADVANCED EDUCATION OF BRITISH COLUMBIA and
TRINITY WESTERN UNIVERSITY

RESPONDENTS

AFFIDAVIT

I, Dr. Samuel H. Reimer, Sociologist and Sociology Professor, of Moncton, New Brunswick,
MAKE OATH AND SAY AS FOLLOWS:

1. I am a full professor of Sociology in the department of sociology at Crandall University in Moncton, New Brunswick. I have been employed by Crandall University for 18 years, was tenured in 2002, and received the rank of full professor in 2008.
2. From 2005 to 2006, I was a visiting scholar at Baylor University's Institute for Faith and Learning in Waco, Texas.
3. In 2013, I was a visiting fellow at the Centre for Studies in Religion and Society at the University of Victoria in British Columbia.
4. I received my Master's degree in Sociology from the University of Notre Dame in 1993. I received my Ph.D. in Sociology from the University of Notre Dame in 1997. My

dissertation was on “*North American Evangelicalism: A Look at Regional and National Variation in Evangelical Religiosity.*”

5. My areas of expertise include: (a) the Sociology of Religion, particularly with respect to evangelicalism in North America; (b) Canada and U.S. religious comparisons; (c) Christian congregations, and (d) statistics and research methods.
6. I am a member of the Society for the Scientific Study of Religion, the Religious Research Association and the Association for Sociology of Religion.
7. I have done extensive research (over 20 years) on evangelicalism in Canada and the U.S., with hundreds of interviews of (lay) evangelicals, Protestant pastors and leaders, as well as qualitative and quantitative studies of evangelical congregations. As noted above, my dissertation examined evangelicals in Canada and the U.S.
8. I have written two scholarly books and fifteen (or so) scholarly, peer-reviewed articles and book chapters on evangelicals, evangelical congregations, and Christianity in North America.
9. In 2003, I published a book through McGill-Queen’s University Press entitled *Evangelicals and the Continental Divide: The evangelical subculture in Canada and the United States.*
10. I have also co-authored a book on *Evangelical Congregations in Canada*, which is forthcoming by McGill-Queen’s University Press.
11. I have reviewed articles for *Social Forces*, *Journal for the Scientific Study of Religion*, *International Journal for Religious Research*, *Canadian Journal of Sociology*, *Comparative Political Studies*, *Review of Religious Research*, *Sociological Spectrum*, *Social Science Research and Sociology of Religion*.

12. I have reviewed books for McGill-Queen's University Press, Journal for the Scientific Study of Religion and the Sociology of Religion.
13. I have also written about religiosity and educational outcomes (article published in 2010) and am currently writing an article on evangelical schools in Canada and the U.S.
14. My teaching regularly includes university courses in the sociology of religion, evangelicalism in Canada, and the sociology of education. I have acted as an external examiner on two Ph.D. dissertation defenses at the University of Waterloo (related to religion in Canada). Other scholarly involvements include collaborator and co-investigator roles on two projects examining religion in Canada, funded by the Social Sciences and Humanities Research Council.
15. Attached as Exhibit "A" is a copy of my Curriculum Vitae, which gives further details of my work in my areas of expertise.

Area of Opinion

16. I have been asked by legal counsel for Trinity Western University (TWU) to provide an opinion based on my expertise as a sociologist who specializes in religious subcultures and, in particular, evangelicalism in North America. The statements made in this Affidavit are based directly on my extensive involvement in this area of research and scholarship and are true to the best of my knowledge and belief.
17. I am aware that, as an expert, my duty is to assist the court and not be an advocate for any party. I have prepared my responses in conformity with that duty and will, if called on to give oral or written testimony, give that testimony in conformity with that duty.
18. Attached as Exhibit "B" is a copy of the Bibliography of works cited in this Affidavit.

19. In preparing my opinion, I have reviewed and considered the following documents, which were provided to me by legal counsel for TWU and which can be found online at the addresses indicated below:

(a) Community Covenant, which can be accessed at:

<https://twu.ca/studenthandbook/twu-community-covenant-agreement.pdf>

(b) Statement of Faith of TWU, which can be accessed at:

<http://twu.ca/divisions/hr/employee/documents/statement-of-faith.pdf>

(c) TWU Core Values, which can be accessed at:

<http://twu.ca/about/values/>

(d) Parts of the TWU Student Handbook, which can be accessed at:

2013-2014: <https://twu.ca/studenthandbook/>

2012-2013: <http://twu.ca/studenthandbook/student-handbook-2012-2013.pdf>

20. I have assumed that the following facts are true:

(a) TWU was established in 1962 through and by the Evangelical Free Church of America.

(b) TWU retains ties with the Evangelical Free Church of Canada and the Evangelical Free Church of America.

(c) TWU is a liberal arts and sciences university based in Langley, British Columbia, that provides education with an underlying philosophy and viewpoint that is Christian.

(d) All faculty and staff of TWU agree to and annually sign the Statement of Faith.

- (e) All members of TWU's community, including faculty, staff and students agree to the terms of the Community Covenant.
 - (f) The terms and statements of the Community Covenant are based on the religious beliefs and teachings of TWU.
-
- 21. In this Affidavit, I will be referring to evangelism, evangelicals, and evangelicalism. Evangelism refers to "witnessing" or "proselytizing", in that evangelicals are encouraged to share their faith with non-evangelicals in the hope that the latter will adopt their faith.
 - 22. Evangelicals are religious individuals who are typically defined by scholars based on their shared beliefs, by self-identification, or by denominational affiliation (Ammerman 1982; Hackett and Lindsay 2008). When denominational affiliation is used, evangelicals are defined as those who belong to a set of conservative Protestant denominations, including most Baptists, Pentecostals, Wesleyans, Christian and Missionary Alliance, and many other denominations (Bibby 2011).
 - 23. Evangelicalism refers to the religious subculture made up of evangelicals and their institutions (like churches and schools). Bebbington (1989) states that evangelicalism is distinguished by four emphases historically: the authority of the Bible; the unique work of Jesus Christ as the only means of salvation; the importance of a conversion experience; and an active faith, involving church attendance, devotionism (Bible reading and prayer) and evangelism.
 - 24. For the purposes of this Affidavit, evangelicals are distinguished from fundamentalists. Unlike evangelicals, fundamentalists have greater separation from and tension with the rest of society, believe the Bible should be taken literally, word for word, and often encourage separation even from evangelicals (Marsden 1980). Fundamentalists hold stricter moral boundaries (no dancing, no smoking, no going to bars, etc.) and tend to be more outspoken (and less irenic) about what they perceive to be the moral decline of society. Fundamentalism is not nearly as prevalent in Canada as it is in the U.S.

(Noll 1992), and evangelicals and fundamentalists are often conflated by the media and even by academics in both countries (Haskell 2007; Ecklund 2010).

25. I have been asked to respond to the following questions:

1. What is a religious subculture?

26. Put simply, a subculture is a group within a larger society/culture that is distinctive in beliefs, behaviours, customs, language, and/or other factors. A religious subculture is usually delineated by its religious beliefs, rituals and/or devotional practices, identity, and/or moral and ideological boundaries.

2. Do Evangelical Christians comprise a religious subculture within Canada?

27. Yes. Evangelicals in North America comprise a religious subculture that is distinct and to some degree, in tension with the larger culture. In my 2003 book, my central thesis is “that there exists a transdenominational transnational evangelical subculture in North America. This subculture is distinctive, and those active in it have a clear sense of identity, a clear understanding of subcultural boundaries, and knowledge of the norms and values associated with it” (2003, 21). Other leading scholars of evangelicalism make similar arguments (e.g. Smith 1998; Tamney 2002; Wheeler 1995).

28. Evangelicals hold distinctive beliefs; these include the authority of the Bible, the unique salvific work of Jesus Christ, the importance of a conversion experience, and the importance of an active faith that is expressed through church attendance, Bible reading, prayer, and evangelism. Such beliefs also delineate moral boundaries, which are most notably related to conservative sexual ethics and the preservation of the traditional family (understood to be a marriage between one man and one woman, with their dependent children).

29. Since evangelicals believe that God should be “lord” of all parts of their lives, they believe that God’s standards, as expressed in the Bible, take precedence over societal norms or popular opinion. Thus, evangelicals often carry their beliefs and moral values into the public sphere, including the spheres of work, education and politics. Their faith is not limited to their private lives.
- 3. If so, do evangelical Christians commonly establish and hold codes of conduct within their subculture?**
30. Yes. Distinctive codes of conduct are common in religious (and non-religious) subcultures.
31. For evangelicals, behavioural expectations include regular church attendance, private devotional Bible reading and prayer, evangelism, acts of charity, sexual moral purity, and others.
32. Sexual moral purity includes abstaining from sexual intimacy outside of traditional marriage (between one man and one woman), and certain behaviours that are thought to lead to compromising sexual purity (like viewing pornography, going to strip clubs, nudity outside the marriage context, etc.).
33. Evangelicals are also expected to avoid drunkenness, smoking, and illicit drug use. Finally, codes against cheating, lying, gossiping, and vulgar language are typical within the subculture.
- 4. If so, on what are such codes of conduct normally or commonly based?**
34. All these behavioural expectations are widely accepted by evangelicals across denominational and national/regional lines because they are understood to be based on biblical mandate.

35. By this I mean that behavioural codes are understood to come directly from the commands and/or principles in the Bible. For example, the well-known “ten commandments” in the Old Testament are to be obeyed by evangelicals, which include strictures against lying, stealing, idolatry, swearing, and more. The creation account in Genesis, in combination with the teachings and commands of the Apostle Paul’s writing in the New Testament, are understood to restrict marriage to one man and one woman. Similarly, the New Testament teachings of the Apostle Paul are understood to reject sexual intimacy outside of monogamous, heterosexual marriage. The New Testament book of James speaks against favouritism, insisting that all persons be treated with respect and equality. Jealousy and coveting other people’s possessions are also prohibited because of biblical mandate. Many other examples are possible.
 36. The point is that biblical standards or commands are considered to take precedence over societal norms for evangelicals because of their belief in the authority of the Bible.
- 5(a) Does maintaining a code of conduct provide benefits to religious subcultures?**
37. Yes, it can.
- 5(b) If so, what are those benefits?**
38. If codes of conduct are distinctive, they increase the strength of and commitment to the subculture. Here I draw from the influential model of subcultural strength developed most articulately in the writings of Chris Smith (e.g. Smith, 1998, 2000), which has been applied in both Canada and the U.S. to explain the strength of the evangelical subculture (Smith 1998; Reimer 2003).
 39. Religious subcultures that have distinctive behaviours, beliefs, and/or moral boundaries tend to strengthen the identity of those in the subculture. They do this by providing meaning (life purpose as given by God, clarity on what is good or bad, right or wrong, etc.) and belonging (one is part of “God’s family”, etc.).

40. Distinctive identities, behaviours and moral codes strengthen commitment to the subculture, and thus strengthen the subculture. If there are clear and salient differences between evangelicals and most others in society, then there is a desire to participate in organizations within the subculture (like evangelical churches or schools) because humans like to interact with others like them (called “homophily” among sociologists).
41. If evangelicals participate in churches, schools, and other evangelical organizations, the subculture is strengthened because evangelicals are socialized by these institutions to be more committed to evangelical beliefs and values. Hence, research clearly shows that those who attend evangelical churches are much more likely to hold evangelical beliefs and moral values.
42. Similarly, those who attended evangelical schools as children are more likely to be active in their faith as adults than those who attend public schools (Pennings et al., 2012). Those active in evangelical institutions are more committed, and evangelical institutions enhance commitment and thus strengthen the subculture. In Smith’s words, “Religion survives and can thrive in pluralistic, modern society by embedding itself in subcultures that offer satisfying morally orienting collective identities which provide adherents meaning and belonging” (1998, 118).
43. Since evangelicalism is an “engaged subculture” in that they do not physically remove themselves from the broader culture, they develop a greater understanding of their distinctiveness through interaction with non-evangelicals. This also strengthens their identity. Since they believe and behave differently than other people, their religious convictions stand out, which enhances the importance of these convictions for their self-concept.
44. There are, however, possible risks to (very) distinctive codes of conduct (and other differences). A religious group can be in too much tension with society if they are too distinctive. This can limit their appeal to others, limiting their growth potential. Thus, there is a balance for strong subcultures to maintain distinctiveness without being in too

much tension with society. To quote Smith again, “In a pluralistic society, the religious groups will be relatively stronger which...create both distinction from and significant engagement and tension with other relevant outgroups, short of becoming genuinely countercultural” (1996, 119). In Smith’s view, evangelicalism has been able to maintain that balance, and that is why it is thriving. Evangelicalism in both North American countries is a strong religious subculture because they have been able to maintain distinctiveness in its beliefs and behaviours (Smith 1996; Reimer 2003).

45. Another influential model in sociology states that “stricter” (more conservative, those that have behaviours and beliefs that are in tension with society) religious subcultures are stronger because involvement in them is costly (Iannaccone 1992; Kelley 1972). They are more costly because they demand higher commitment and have greater restrictions, which can be costly if it keeps devotees from certain pleasures (like going to bars or parties). Strict religious subcultures or groups are demanding, making it unlikely that “free-riders” will get involved and lower the overall commitment to the religious group. Regardless of the model used to explain the vitality of evangelicals (or other conservative religious groups), the literature agrees that distinctive and demanding religious groups have greater strength and vitality because they are distinctive and demanding.
46. Distinctive subcultures can also benefit society. They add to the diversity of society and they often present alternative positions that challenge blind conformity to the status quo. Religious subcultures provide many benefits. In the words of the leading sociology of religion voice in Canada, Reginald Bibby (University of Lethbridge):

These findings point to a fairly consistent pattern in both Canada and around the world: people who are religious are more likely than those who are not to endorse positive interpersonal values and exhibit positive interpersonal behaviour...[O]n balance, religion appears to be making a noteworthy contribution to social well-being. Yet, religion typically has a positive influence to the extent that it also is associated with other institutions that have a positive impact on interpersonal life (2011, 160).


47. In addition, research on young adults who attended private (non-governmental) high schools, particularly religious private schools, concludes “Overall, graduates of non-government schools are at least as likely to be involved in society and culture working toward “the common good” as their public school counterparts” (Pennings et al. 2012, 7). The report also found that those who attended evangelical high schools are more likely to be generous and to volunteer.
48. For evangelicalism in particular, their emphasis on “loving your neighbour” means that they lead all religious groups in charitable giving and volunteerism (Bowen 2004; Hiemstra 2009; Reimer and Wilkinson, forthcoming). It is well-established in the literature that those who regularly attend religious services are more generous with their time and money than those who attend less frequently or not at all (Turcotte 2012; Vézina and Crompton 2012).
49. Consistent with these findings, evangelicals have higher levels of church attendance than any other major Christian group in Canada (Bibby 2011) and are also the most generous. This is because churches encourage and provide opportunities for volunteerism and giving. It is false to assume that such charity is primarily directed toward evangelism and strengthening evangelicalism. In fact, evangelicals volunteer for, and give to, non-religious organizations and to social justice causes (like poverty reduction) more than any other major religious (or non-religious) grouping in Canada (Steensland and Goff 2014; Hiemstra 2009). One study demonstrated that an average U.S. church provides over \$180,000 worth of voluntary services to their community each year, with Canadian churches only slightly behind that level (Cnaan et al., 2002). The evangelical subculture (and church attendance more broadly) seems to encourage the development of active, charitable citizens (Putnam and Campbell 2010).

50. My current research on Churches and Immigrant settlement and integration in Canada shows that evangelical churches are active in helping immigrants and refugees settle and integrate in Canada (as are mainline Protestant and Catholic churches, but preliminary findings show that evangelical churches show greater involvement). Other scholars have also noted this role among Christian churches (Bramadat and Seljak 2008).
 51. Commitment to religious subcultures like evangelicalism also benefits society indirectly by benefiting the individuals involved in it. Youth and young adults who are active in religious subcultures are less likely to be involved in at-risk behaviours (sexual promiscuity, experimental drug use, drunkenness), and are thus less likely to have run-ins with the law (Uecker, Regnerus and Vaaler 2007). Clearly, less crime has benefits for society. They also claim to be happier and they tend to live longer (Bowen 2004).
- 5(c) Would your answer in 5(b) be true in respect of a code of conduct applicable within an educational institution that serves the members of that subculture?**
52. Yes. Distinctiveness strengthens educational institutions within the subculture for the same reasons as it strengthens the subculture.
- 6. Based on your review of the documents and the facts assumed to be true, is TWU part of the evangelical Christian religious subculture within Canada?**
53. Yes. I have reviewed the TWU Statement of Faith, Community Covenant, Core Values, and the applicable sections of the Student Handbook, which contain their beliefs and codes of conduct. TWU is clearly within the evangelical subculture. It is not fundamentalist.
 54. These documents are typical of what would be found in many other evangelical schools (in general content, not necessarily in exact wording). TWU is known in Canada (at least among Canadian evangelicals, both now and historically) as a flagship evangelical institution of higher learning (see Stackhouse, 1993).

Conclusion

55. I conclude that there is a pervasive evangelical subculture in North America that has spawned a wide variety of institutions, including schools like TWU. TWU is clearly an evangelical institution. Evangelicals do hold distinctive beliefs, codes of conduct, and moral boundaries, all of which have the potential to strengthen the evangelical subculture and the institutions within it. Religious subcultures can also provide benefits for society.

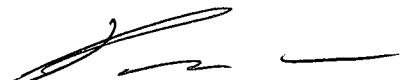
SWORN BEFORE ME at the ^{Town} ~~City~~ of)
River View, in the Province of)
 New Brunswick, this 11 day of July, 2014.)


 A Commissioner for taking Affidavits within)
 New Brunswick)

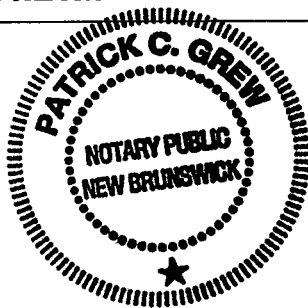

 SAMUEL H. REIMER



This is Exhibit "A" referred to in the Affidavit of
Dr. Samuel H. Reimer sworn/affirmed before me
at River View, in the Province of
New Brunswick, this 11 day of July, 2014.



A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE PROVINCE OF NEW BRUNSWICK



CURRICULUM VITAE FOR SAMUEL H. REIMER

Status: Full Professor, Sociology

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WORK HISTORY

1996-2002-Assistant Professor of Sociology, Atlantic Baptist University.
2002-2008-Associate Professor of Sociology, Atlantic Baptist University
2005-2006- Visiting Scholar, Baylor's Institute for Faith and Learning, Waco, Texas
2008-present Professor of Sociology, Atlantic Baptist University/Crandall University
2013- Visiting Fellow at the Centre for Studies in Religion and Society, University of Victoria, B.C. (3 months, position without funding)

EDUCATION

| | Dates attended | Degree and date received | Major |
|------------------------------|---------------------------|-------------------------------------|--------------|
| University of Notre Dame, IN | 8/93 -7/96 | PhD, 1/97 | Sociology |

Dissertation: "North American Evangelicalism: A Look at Regional and National Variation in Evangelical Religiosity"
(Comprehensive Exams Areas: Methods and Statistics; Sociology of Religion)

| | | | |
|------------------------------|-----------|----------|-----------|
| University of Notre Dame, IN | 8/91-6/93 | MA, 6/93 | Sociology |
|------------------------------|-----------|----------|-----------|

Master's Thesis: "Predictors of Protestant Church Attendance: A U.S./Canada Comparison"

| | | | |
|------------------------------------|-----------|----------------|-----------|
| University of Waterloo, ON, Canada | 9/88-6/90 | BA (Hon), 6/90 | Sociology |
|------------------------------------|-----------|----------------|-----------|

| | | | |
|--------------------------------------|-----------|-----------|----------|
| Briercrest Bible College, SK, Canada | 9/83-6/87 | BRE, 6/87 | Theology |
|--------------------------------------|-----------|-----------|----------|

Books

Evangelicals and the Continental Divide: The evangelical subculture in Canada and the United States. Montreal and Kingston: McGill-Queen's University Press, 2003.

Evangelical Congregations in Canada. (forthcoming). McGill Queen's University Press.
Coauthored with Michael Wilkinson.

Published Refereed Articles

"Canadian Christian churches increase in part-time staff: Evidence from the CRA T3010 data." *Studies in Religion* (forthcoming). Coauthored with Rick Hiemstra.

"Pentecostal Assemblies of Canada's Congregations: Vitality, Diversity, Identity and Equity." *Canadian Journal of Pentecostal-Charismatic Christianity* 3(1):41-69 (2012).

"Orthodoxy Niches: Diversity in Congregational Orthodoxy among three Protestant denominations in the U.S." *Journal for the Scientific Study of Religion* 50(4):763-79 (December 2011).

"Higher education and theological liberalism: Revisiting the old issue." *Sociology of Religion*, 71(4):393-408 (Winter 2010).

"Class and Congregations: Class and Religious Affiliation at the Congregational Level of Analysis." *Journal for the Scientific Study of Religion* 46(4):583-594 (December 2007).

"Things that make for a Peaceable Kingdom: An Overview of Christianity and 'Cooperativeness' Across the Continental Divide" (Co-authored with Dennis Hoover). *Journal of Ecumenical Studies* 41(2):205-222 (Spring 2004).

"Lay Cooperation in Canada: Catholic and Mainline and Conservative Protestant Attitudes toward Interdenominational Cooperation." *Journal of Ecumenical Studies* 41(2):223-246 (Spring 2004).

"Revisiting the Social Sources of American Christianity 1972-1998." (Co-authored with Jerry Park). *Journal for the Scientific Study of Religion* 41(4):735-748 (December 2002).

"Evangelical Protestantism Meets the Continental Divide: Moral and Economic Conservatism in the United States and Canada." (Co-authored with Dennis Hoover, Michael Martinez, Ken Wald). *Political Research Quarterly* 55(2): 351-374 (June 2002).

"Tolerant (In)civility? A Longitudinal Analysis of White Conservative Protestants' Willingness to Grant Civil Liberties." (Co-authored with Jerry Park). *Journal for the Scientific Study of Religion* 40 (4):735-746 (December, 2001).

"A Look at Cultural Effects on Religiosity: A Comparison Between the United States and Canada." *Journal for the Scientific Study of Religion* 34: 445-457. (December 1995).

Other Published Articles

"Congregational vitality among Evangelical Churches in Canada." *Church and Faith Trends* 5:1 (June, 2012), 17 pp.

"A demographic look at Evangelical Congregations." *Church and Faith Trends* 3:2 (August, 2010). 21pp.

“Pastoral Well-being: Findings from the Canadian Evangelical Churches Study.” *Church and Faith Trends* 3:2 (August 2010). 17pp.

“Evangelical congregational income during the first 4 months of 2009” *Church and Faith Trends* 3:1 (Feb. 2010).

“More alike than we think.” (comparison of American and Canadian evangelicals). *Christian Week* 18(15):10 (October 15, 2004).

Book Chapters (refereed)

“Mennonite Brethren in Canada: Findings from the 2009 Canadian Evangelical Churches Study.” In Heidebrecht, Doug, Abe Dueck and Bruce Guenther (eds.), *Renewing Identity and Mission: Mennonite Brethren Reflections after 150 Years*. Kindred Productions, 2011.

“Civility without Compromise”: Evangelical attitudes toward same-sex issues in comparative context.” In David Rayside and Clyde Wilcox (eds.), *Faith, Politics and Sexual Diversity in Canada and the United States*, pp.71-86. UBC Press, 2011.

“Sect Appeal: Rethinking the Class-sect link.” In Sean McCloud and William A. Mirola (eds.), *Religion and Class in America: Culture, History and Politics*, pp. 69-89. Brill, 2009.

“Does Religion Matter? Canadian Religious Traditions and Attitudes toward Diversity.” In Lori G. Beaman and Peter Beyer (eds.), *Religion and Diversity in Canada*, pp. 105-125. 2008. Brill. (Religion and Social Life Series, vol. 16).

“A Look at Cultural Effects on Religiosity: A Comparison Between the United States and Canada.” Reprinted in Beaman, Lori (ed.), 2006. *Religion and Canadian Society*, pp. 54-70. Toronto: Canadian Scholar’s Press.

“A Generic Evangelicalism? Comparing the Evangelical Subculture in Canada and the U.S.A.” In David Lyon and Marguerite Van Die (eds.), *Rethinking Church, State, and Modernity: Canada between Europe and America*, pp. 228-246. Toronto: University of Toronto Press, 2000.

A More Irenic Evangelicalism? Comparing American and Canadian Evangelicals. In Daniel Goodwin (ed.), *Revivals, Baptists, and George Rawlyk: Essays in Memory of George A. Rawlyk*, pp. 153-179. Wolfville, NS: Gaspereau Press, 2000.

Editor

Co-guest editor (with Daniel C. Goodwin) of “Ecumenism: New Studies in North American Perspective” *Journal of Ecumenical Studies* 41(2), spring 2004 (actually published in 2006). Introduction (co-authored with Daniel C. Goodwin): 121-123.

Grants, Awards and Honours

2014- Fall graduation commencement speaker, Crandall University. Nov. 1, 2014.

2013-14- Stephen and Ella Steeves Award for Excellence in Teaching, Crandall University.

2013-14- Research Innovation Grant, competitively offered to members of the Religion and Diversity Project (see below), for a research project entitled "Christian churches and immigration: integration and identity." Total: \$10,000

2013-14 Co-investigator/Co-applicant in SSHRC funded (Partnership Development Grant) The Role of Churches in Immigrant Settlement and Integration: Developing a National Research Partnership. Total: \$197,500.

2010-2013 Collaborator in a Social Sciences and Humanities Research Council (SSHRC), entitled *The Religion and Diversity Project*, principle investigator Lori Beaman of the University of Ottawa. The grant is part of SSHRC's Major Collaborative Research Initiatives (MCRI) program. Total: \$2.5 million.

2008-09 Centre for Research on Canadian Evangelicalism. "Canadian Evangelical Congregations: Healthy Churches Study." Principle investigator, with co-investigators Michael Wilkinson and Andrew Grenville. \$45,000.

2007-08 Recipient of the Stephen. S. Steeves Excellence in Research Award, Atlantic Baptist University.

2005 Recipient of Stephen S. Steeves Sabbatical award, Atlantic Baptist University. \$10,000

2005 Visiting Scholar, Institute for Faith and Learning, Baylor University. Position with research funding. \$2000

2004 Society for the Scientific Study of Religion Research Award. \$2500

2000-03 Coalition of Christian Colleges and Universities Initiative Grant to Network Christian Scholars. "Cooperative Christianity in Canada In Comparative Perspective: Interdenominational Relations from the Nineteenth Century to the Present." (Grant includes funds for two colloquiums, presentations at the Canadian Learned Societies, and an edited volume, 2000-2003). Other scholars involved: Daniel Goodwin, Dennis Hoover, Richard Loughheed, Mark Noll. \$15,000

1995 David W. Dodge Memorial Award for Excellence in Teaching by a Graduate Student. Sociology Department, University of Notre Dame.

1995 Research Award, Society for the Scientific Study of Religion

1995 Constant H. Jacquet Research Award, Religious Research Association.

1995 The Helen Kellogg Institute for International Studies, Dissertation Year Fellowship.

Presentations at Professional Meetings

2014 “Comparing Conservative Protestant school outcomes in Canada and the US” at the Workshop on Religious Schools and School Sector Differences in North America. Cardus Religious School Initiative, University of Notre Dame, May 14. Invited, funded lecture.

2014 “Christian Congregations in (Atlantic) Canada: still relevant?” It was recorded by Eastlink TV (showing later this year) and I was interviewed by radio (FM91.9). Key note address at the Religion in Atlantic Canada conference at St. Mary’s University, May 20. Invited funded lecture with honorarium.

2014 “Changing the Ethos of Evangelical Congregations: Missional churches in Canada.” CSSR, Congress 2014, Brock University.

2014 “Christian churches and immigrant settlement in Canada.” CSSR, Congress 2014, Brock University.

2013 “Evangelical denominational and congregational growth in Canada” Annual Meeting of the Society for the Scientific Study of Religion, November 8, 2013.

2013 “Science defines religion” co-presented (with George Yancey and Jake O’Donnell). Annual Meeting of the Society for the Scientific Study of Religion, November 9, 2013.

2013 “Hemorrhaging Faith” co-presented (with James Penner). Annual conference of the Canadian sociological association, Congress 2013, June 6, 2013. University of Victoria, BC.

2012 “Emerging Adults losing faith in Canada” co-presented (with James Penner). Annual Meeting of the Society for the Scientific Study of Religion, November 9, 2012, Phoenix, AZ.

2012 “Evangelical Protestants and social engagement in Canada” Co-presented (with Michael Wilkinson) in Cambridge, UK as part of Religious diversity in Canada SSHRC grant, September 4-7, 2012.

2011 “Churches, budgets and part time staff” Annual Meeting of the Society for the Scientific Study of Religion, Milwaukee, WI, Oct 28-30. Also convened 2 sessions.

2011 “Pentecostal Congregations in Canada.” Annual Meeting of the Canadian Society for the Study of Religion (CSSR). Congress for the Social Sciences and Humanities, UNB, Fredericton, NB, May 30.

2010 “Evangelical congregations in Canada: Preliminary findings.” Annual Meeting of the Society for the Scientific Study of Religion, Baltimore, MD, Oct 29-31.

2010 “Diversity in Canadian Evangelical Congregations.” Annual Meeting of the Canadian Society for the Study of Religion (CSSR). Congress for the Social Sciences and Humanities, Concordia University, Montreal, PQ, May 30.

2008 "Education and Theological Liberalism: Revisiting an old issue." Annual Meeting of the Society for the Scientific Study of Religion, Oct. 17, Louisville, KY.

2008 "An Overview of Sociology of Religion scholarship in Canada." Religion in Canada Institute, Trinity Western University, Feb. 9. (invited lecture with funding)

2007 "Evangelical sexual attitudes in comparative perspective." Round-table presentation at the biennial conference of the Association for Canadian Studies in the United States at the Toronto Harbour Westin Hotel, Nov 14-18.

2007 "Civility without Compromise: Evangelical Attitudes toward Same-sex issues in Comparative Context." Presented at the Politics, Religion and Sexuality Conference at the University of Toronto, January 18-19, 2007. (invited lecture with funding and honorarium)

2006 "Conservative traditions and the weakening class link in the United States" Presented at the annual meeting for the Association for the Study of Religion, Economics, and Culture, October, 2006.

2006 Organized a joint ASA/ASR session on Religion and the Continental Divide, presented a paper called "Comparing US and Canadian Evangelicals." Montreal, PQ: August, 2006.

2004 "Class and Congregations: Class and Denominational Affiliation at the Congregational Level of Analysis." Presented at the Annual Meeting of the Society for the Scientific Study of Religion, Kansas City, Missouri. October 22.

2003 "Sect Appeal: Rethinking the Class-Sect Link." Presented at the Annual Meeting of the Society for the Scientific Study of Religion, Norfolk, VA. October 24-6.

2002 "Lay Cooperation in Canada: Catholic, Mainline and Conservative Protestant Attitudes toward Interdenominational Cooperation." Presented at the Annual Meeting of the Canadian Society of Church History. Congress for the Social Sciences and Humanities, University of Toronto, Toronto, Ontario, Canada. May 26-27.

2001 "Lay Cooperation in Canada: Catholic, Mainline and Conservative Protestant Attitudes toward Interdenominational Cooperation." Presented at the Colloquium on Cooperative Christianity in Canada, Atlantic Baptist University, Moncton, New Brunswick, Canada. April 5.

2000 "Transnational Evangelical Politics: Understanding Evangelical Exceptionalism in the United States and Canada." Annual Meeting of the Society for the Scientific Study of Religion, Houston, Texas. Co-authored with Dennis Hoover, Michael Martinez and Ken Wald.

1999 "The Demographics of American Evangelicals from 1972-1998: Examining Evidence for the Hunter and Smith Profiles." Presented at the Annual Meeting of the Society for the Scientific Study of Religion, Boston, MA. Co-authored with Jerry Park.

1998 "Are White Conservative Protestants Still Uncivil? A longitudinal Analysis." Presented at the Annual Meeting of the Society for the Scientific Study of Religion, Montreal, Quebec. Co-authored with Jerry Park.

1997 "A More Irenic Evangelicalism? Comparing American and Canadian Evangelicals." Presented at the Revivals, Baptists and George Rawlyk Conference, Moncton, New Brunswick.

1996 "Evangelical Subcultural Distinctiveness in North America." Presented at the Annual Meeting of the Society for the Scientific Study of Religion, Nashville, Tennessee.

1995 "Reconsidering Evangelical Attributes." Presented at the Annual Meeting at the Society for the Scientific Study of Religion, St. Louis, Missouri.

1995 "North American Evangelical Comparisons." Presented at the Conference on the Canadian Evangelical Experience, Kingston, Ontario, Canada.

Book Reviews:

2014. Steensland, Brian and Philip Goff. *The New Evangelical Social Engagement*. Oxford University Press, 2014. *Journal for the Scientific Study of Religion*, September.

2013. Wittberg, Patricia. *Building Strong Church Communities: A Sociological Overview* Sam Reimer *Sociology of Religion* 2013; doi: 10.1093/socrel/srt035

2010. Wilkinson, Michael. *Canadian Pentecostalism: Transition and Transformation*. Montreal & Kingston: McGill-Queen's University Press, 2009. *Canadian Journal of Pentecostal-Charismatic Christianity* 1(1):170-75.

2007. Bowen, Kurt. *Christians in a Secular World: The Canadian Experience*. McGill-Queen's University Press, 2004. *Church and Faith Trends*.

2006. *Canadian Pentecostalism: Transition and Transformation*. Manuscript review for McGill-Queen's University Press.

2005 Smith, Christian (ed.). *The Secular Revolution*. In *Sociology of Religion* 66(1):93-5.

2002 Smith, Christian. *Christian America?* In *Sociology of Religion* 63(1):131-3.

2001 Eskridge, Larry and Mark Noll (eds). *More Money, More Ministry*. In *JSSR* 40(4):791.

Memberships:

Society for the Scientific Study of Religion
Religious Research Association
Association for the Sociology of Religion.

I have reviewed articles for *Social Forces*, *Journal for the Scientific Study of Religion*, *International Journal for Religious Research*, *Canadian Journal of Sociology*, *Comparative Political Studies*, *Review of Religious Research*, *Sociological Spectrum*, *Social Science Research and Sociology of Religion*.


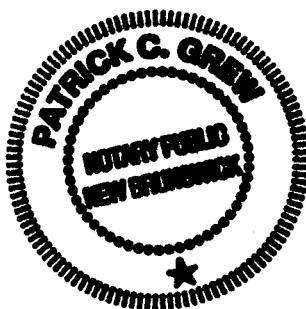
I have reviewed books for McGill-Queen's University Press, *Journal for the Scientific Study of Religion* and the *Sociology of Religion*.

Research Grants

Government Research Grant:

2002 *Region II Mental Health Services: Key Informant Interviews* with Bill Morrison and Associates. (January and March, 2002).

This is Exhibit "B" referred to in the Affidavit of
Dr. Samuel H. Reimer sworn/affirmed before me
at River View, in the Province of
New Brunswick, this 11 day of July, 2014.


A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE PROVINCE OF NEW BRUNSWICK

Works Cited

- Ammerman, N.T. 1982. Comment: Operationalizing Evangelicalism: An Amendment. *Sociological Analysis* 2:170-2.
- Bebbington, David W. 1989. *Evangelicalism in Modern Britain*. New York: Routledge.
- Bibby, Reginald. 2011. *Beyond the Gods and Back*. Lethbridge: Project Canada Books.
- Bowen, K. 2004. *Christians in a Secular World: The Canadian Experience*. Montreal-Kingston: McGill-Queen's University Press.
- Cnaan, R., S.C. Boddie, F. Handy, G. Yancey, and R. Schneider. 2002. *The Invisible Caring Hand: American Congregations and the Provision of Welfare*. New York: New York University Press.
- Ecklund, Elaine Howard. 2010. *Science vs. religion: What scientists really think*. Oxford and New York: Oxford University Press.
- Hackett, C. and D.M. Lindsay. 2008. Measuring Evangelicalism: Consequences of Different Operationalization Strategies. *Journal for the Scientific Study of Religion* 47(3):499-514.
- Haskell, D. 2007. "News media influence on non-Evangelicals' Perceptions of Evangelical Christians: A Case Study. *Journal of Media and Religion* 6(3): 153-179.
- Hiemstra, R. 2009. "Evangelical Giving and Volunteering." *Church & Faith Trends* 2(2): 1-10.
- Iannaccone, L. 1992. "Sacrifice and Stigma: Reducing Free-riding in Cults, Communes, and Other Collectives." *Journal of Political Economy* 100: 271-291.
- Kelley, D. 1972. *Why Conservative Churches are Growing*. New York: Harper and Row.
- Marsden, G.M. 1980. *Fundamentalism and American Culture*. Oxford and New York: Oxford University Press.
- Noll, M. 1992. *A History of Christianity in the United States and Canada*. Grand Rapids, MI: Eerdmans.
- Pennings, R., D. Sikkink, D. Van Pelt, H. Van Brummelen, and A. von Heyking, A. 2012. *Cardus Education Survey: A Rising Tide Lifts All Boats*.
- Putnam, R.D and D.E. Campbell. 2010. *American Grace: How Religion Divides and Unites Us*. New York: Simon and Schuster.
- Reimer, S. 2003. *Evangelicals and the Continental Divide*. Montreal and Kingston: McGill-Queen's University Press.
- Reimer, S. and Wilkinson, M. Forthcoming. *Evangelical Congregations in Canada*. Montreal and Kingston: McGill-Queen's University Press.
- Smith, Christian 1998. *American Evangelicalism: Embattled and Thriving*. Chicago: University of Chicago Press.

_____. 2000. *Christian America? What Evangelicals Really Want*. Berkeley and Los Angeles, CA: University of California Press.

Stackhouse, J. G. Jr. 1993. *Canadian Evangelicalism in the Twentieth Century*. Toronto: University of Toronto Press.

Steensland, B. and P. Goff (eds.) 2014. *The new evangelical social engagement*. Oxford and New York: Oxford University Press.

Tamney, J.B. 2002. *The Resilience of Conservative Religion: The Case of Popular, Conservative Protestant Congregations*. Cambridge: Cambridge University Press.

Turcotte, M. 2012. "Charitable Giving by Canadians." *Canadian Social Trends* 93: 17-36.

Uecker, J., M. Regenerus and M. Vaaler. 2007. "Losing Your Religion: The Social Sources of Religious Decline in Early Adulthood." *Social Forces*. 85(4): 1667-692.

Vézina M. and S. Crompton. 2012. "Volunteering in Canada." *Canadian Social Trends* 93: 37-55.

Wheeler, B. 1995. "You who were far off: Religious divisions and the role of religious research." *Review of Religious Research* 37(4):289-301.



This is the 1st Affidavit
of Gerald Longjohn Jr. in this case
and was made on 22 July 2014

No. S-142908
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TREVOR LOKE

PETITIONER

AND:

MINISTER OF ADVANCED EDUCATION OF BRITISH COLUMBIA and
TRINITY WESTERN UNIVERSITY

RESPONDENTS

AFFIDAVIT

I, Dr. Gerald Longjohn Jr., Vice-President for Student Development, of Grand Rapids, Michigan,
MAKE OATH AND SAY AS FOLLOWS:

1. I serve as the Vice President for Student Development at Cornerstone University ("Cornerstone"), located at 1001 E Beltline Avenue NE, Grand Rapids, Michigan. I have personal knowledge of the facts and matters hereinafter deposed to by me, except where the same are stated to be on information and belief, and as so those facts, I believe them to be true.
2. My area of expertise, based on the experience and education described in this Affidavit, is in college student spiritual formation and the development, communication, and application of student conduct codes within the North American Christian college and university context.

Qualifications, Employment, and Education

3. I hold a Bachelor of Arts in Bible/Theology from the Moody Bible Institute in Chicago, Illinois.
4. I earned my Master of Arts in Christian Education from Trinity International University in Deerfield, Illinois in 2000.
5. I completed and earned a Doctorate of Education in Ethical Leadership from Olivet Nazarene University in Bourbonnais, Illinois in May of 2013. My dissertation was entitled "By the Book: Spiritual Formation and Conduct Codes at Selected Christian Universities."
6. Each of my three degrees contributes relevantly to my expertise in college student spiritual formation and student conduct codes. My undergraduate degree in Bible and Theology from Moody Bible Institute has contributed to my understanding and application of biblical content. My Master of Arts in Christian Education from Trinity International University honed my expertise in adolescent spirituality, discipleship systems and structures, and the philosophy and praxis of youth ministry.
7. Of particular relevance is my Doctorate of Education in Ethical Leadership, completed at Olivet Nazarene University. My chosen dissertation research topic examined the relationship between student conduct codes and the process of spiritual formation at selected Christian colleges and universities. For the purposes of my research I utilized the definition of spiritual formation provided by the Council for Christian Colleges and Universities: "...the biblically guided process in which people are being transformed into the likeness of Christ by the power of the Holy Spirit within the faith community in order to love and serve God and others" (Council for Christian Colleges & Universities, 2011, p. 26).
8. As background to my original research I conducted an extensive literature review that examined existing research and thought on adolescent spirituality, moral and spiritual

development in higher education, the role of student conduct codes, and the role of university personnel in developing, communicating, and implementing student conduct codes. The depth and breadth of the literature examined is documented in the reference list from my dissertation (Longjohn, 2013). Attached as Exhibit "A" to this my Affidavit is a true copy of the reference list from my dissertation.

9. The original research documented in my dissertation was a qualitative study conducted at four Midwestern Christian colleges and universities. The study included a content analysis of each institution's conduct code and related documents as well as focus group interviews with university administrators, student development personnel, student leaders, and a stratified random sample of students. The research questions from the study explored four areas:
 - (a) The integration of spiritually formative goals into formulating and revising student conduct codes at the selected Christian colleges and universities.
 - (b) The integration of spiritually formative goals into communicating and implementing student conduct codes at the selected Christian colleges and universities.
 - (c) Student perception of the integration of spiritually formative goals in the formulation, communication, and implementation of student conduct codes at selected Christian colleges and universities.
 - (d) The effect of interventions or actions by university personnel on student perception of spiritually formative goals in the formulation, communication, and implementation of student conduct codes at selected Christian colleges and universities.
10. I am aware of only one other person who has extensively studied student behaviour codes at Christian liberal arts institutions, being Brad Lau, at George Fox University. I am very familiar with his work and reviewed it for my own professional research and writing. His works, which studied such codes at two liberal arts institutions, are referenced in Exhibit "A".

11. My employment experience also contributes significantly to my expertise in college student spiritual formation and student conduct codes. After ten years of church youth ministry (which contributed significantly to my understanding of adolescent spirituality) I have spent the last ten years working in Christian higher education.
12. For four years I worked in the Student Development department at Judson University (Elgin, IL) ("Judson"), with responsibility for international student admissions and advising, multicultural student advising, and study abroad programming. During my final year at Judson I served as the Director of Intercultural and Academic Integration, with responsibility for student retention. In that capacity I developed a mentoring program for students who were involved in the disciplinary process.
13. My service at Cornerstone over the past six years includes service as the Dean of Community Life, with responsibility for our residence life staff (including Resident Directors and Resident Assistants) and primary responsibility for the student conduct code at Cornerstone. I later was promoted to Vice President for Student Development, a position that I have held for the past four years.
14. During my time at Cornerstone, I have had significant involvement in formulating, revising, communicating, and implementing the policies outlined in our university's student handbook. In 2010, for example, I chaired the committee responsible for a complete rewrite of our student handbook and had direct responsibility for the final wording of most of our policies, as well as the rationale statements included with each policy. Additionally, I oversaw the process of revising and documenting our student discipline procedures, as well as facilitating the use of new student conduct tracking and response software to ensure congruence with our philosophy of student discipline. I have been directly involved in numerous student discipline cases, including currently serving as the appeal point for all disciplinary issues short of dismissals.
15. As Cornerstone's Chief Student Development Officer, I also am regularly responsible to present our student conduct policies and the ethos represented through them to campus stakeholders, including prospective students, new students, and student leaders. I work

closely with our departmental staff to train our student leaders (including Resident Assistants and Commuter Assistants) in the process of communicating and implementing the policies outlined in our student handbook.

16. In my role at Cornerstone I also serve in an advisory or participatory capacity for other university conduct code related issues. For example, two years ago I chaired the “Campus Vitality” subcommittee during the university’s strategic planning process, which reviewed collected data regarding the university’s policies and campus culture. Last year I was a member of Cornerstone’s “Marriage and Human Sexuality Taskforce” and was directly responsible for drafting policies related to the taskforce findings for later approval. I consult, as requested and needed, on policies related to other branches of the university and have served on an appeals committee for Cornerstone’s seminary, Grand Rapids Theological Seminary.
17. Over the last eighteen months I have been collaborating with other campus leaders (including Cornerstone’s President and Provost, and the Director of the Institute for Christianity and Cultural Engagement) on an initiative to proactively foster and inculcate Christian virtues within our campus community. I served as a co-author of the document describing “The Virtues Project” and have facilitated discussions with the Student Development staff and co-facilitated discussions with faculty colleagues regarding embedding the virtues into our practices and programs. In addition to having direct responsibility for embedding The Virtues Project into our chapel program, I have been involved in discussions oriented around campus-wide readings and visiting scholars, such as James K.A. Smith (Calvin College – Grand Rapids, MI).
18. As a higher education professional I have also presented on topics related to my area of expertise at two conferences within the past year. The first was the Association of Christians in Student Development regional drive-in conference, hosted by Cornerstone in August 2013. I developed the conference theme, “Redemption: Embracing Opportunities to Reflect God’s Grace,” and solicited, reviewed, and approved proposals for presentations by colleagues at area CCCU schools. At the conference I presented the

opening keynote address, summarizing original research from my doctoral dissertation, and facilitated the closing panel discussion with residence life personnel.

19. I co-authored and co-presented a paper entitled, "Becoming Fully Human: the Shared Task of the University Community" with Dr. Matt Bonzo, the Director of the Institute for Christianity and Cultural Engagement, at the Kuyper's Institute for Teaching and Learning Conference at Calvin College. Our paper presented the philosophical background and embedding practices related to The Virtues Project, aligning with the conference theme: "Virtues, Vices, and Teaching."
20. Attached as Exhibit "B" to this my Affidavit is a true copy of my short form resume.

Area of Opinion

21. I have been asked by counsel for Trinity Western University ("TWU") to provide an opinion based on my expertise as an expert in codes of conduct in Christian colleges and universities in North America.
22. I am aware that, as an expert, my duty is to assist the court and not to be an advocate for any party. I have prepared my responses in conformity with that duty and will, if called on to give oral or written testimony, give that testimony in conformity with that duty.
23. In preparing my opinion, I have reviewed and considered the following documents, which were provided to me by legal counsel for TWU and which can be found online at the addresses indicated below:
 - (a) Community Covenant, accessed at:
<https://twu.ca/studenthandbook/twu-community-covenant-agreement.pdf>
 - (b) Statement of Faith of TWU, accessed at:
<http://twu.ca/divisions/hr/employee/documents/statement-of-faith.pdf>
 - (c) TWU Core Values, accessed at:

<http://twu.ca/about/values/>

(d) TWU Student Handbooks, accessed at:

2013-2014: <https://twu.ca/studenthandbook/>

2012-2013: <http://twu.ca/studenthandbook/student-handbook-2012-2013.pdf>

24. I have assumed the following facts to be true:

- (a) TWU was established in 1962 through and by the Evangelical Free Church of America.
- (b) TWU retains ties with the Evangelical Free Church of Canada and the Evangelical Free Church of America.
- (c) TWU is a liberal arts and sciences university based in Langley, B.C. and provides education with an underlying philosophy and viewpoint that is Christian.
- (d) All faculty and staff agree to and annually sign the Statement of Faith.
- (e) All members of its community, including faculty, staff and students agree to the terms of the Community Covenant.

25. Relying on the documents and assumed facts referenced above, I have been asked by legal counsel for TWU to answer the following questions:

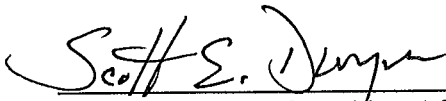
1. *Is it common for Christian colleges and universities to have codes of conduct? (When referring to "Christian colleges and universities", we refer to liberal arts colleges and universities and not educational institutions that are only bible schools or seminaries).*
2. *What do such codes of conduct normally address? On what are such codes of conduct normally based?*
3. *What role(s) do(es) such codes of conduct play in the context of Christian colleges and universities?*
4. *After reviewing TWU's Community Covenant, please comment on:*
 - (a) *The content of the Community Covenant as a "code of conduct".*

- (b) *How the Community Covenant compares with codes of conduct at other Christian colleges and universities of which you are aware.*
- (c) *What benefits, if any, you expect the Community Covenant would provide to the TWU community.*

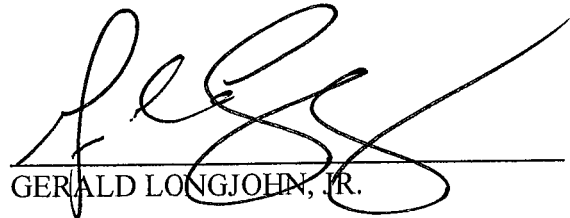
(together, the "Questions").

26. My answers to and opinion on each of the Questions is contained in a report that I prepared (my "Report"). I am solely responsible for the contents and opinions expressed in my Report. Attached as Exhibit "C" to this my Affidavit is a true copy of my Report.
27. Attached as Exhibit "D" to this my Affidavit is a true copy of the Works Cited in my Report.
28. As set out in my Report, and for the reasons expressed therein, it is my opinion that the TWU Community Covenant is well-written and congruent with what I have observed and researched in other Christian colleges and universities. It is clear as it outlines its expectations for how individual members contribute to the campus community and is well-aligned with TWU's stated commitment to biblical authority and core values. I expect that it contributes meaningfully and beneficially to a campus community and culture that is congruent with student expectations and student spiritual growth.

SWORN BEFORE ME at the City of Grand Rapids, in the State of Michigan, this 22 day of July, 2014.



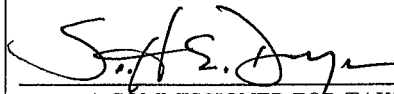
A Commissioner for taking Affidavits within the State of Michigan)



GERALD LONGJOHN, JR.

My commission expires: 12/15/19

This is Exhibit "A" referred to in the Affidavit of Dr. Gerald Longjohn, Jr. sworn/affirmed before me at Grand Rapids, in the State of Michigan, this 22 day of July, 2014.



A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE STATE OF MICHIGAN

REFERENCES

- Andolina, M., Meents-DeCaigny, E., & Nass, K. (2006). College students, faith and the public realm: The relationship between religious attitudes and civic and political engagement. *Journal of College & Character*, 8(1), 1-10.
- Ardaiolo, F. P., Neilson, S., & Daugherty, T. K. (2011). Teaching students personal and social responsibility with measurable learning outcomes. *Journal of College & Character*, 12(2), 1-9.
- Astin, A. W., Astin, H. S., & Lindholm, J. A. (2010). *Cultivating the spirit: How college can enhance students' inner lives*. San Francisco, CA: Jossey-Bass.
- Baldizan, E. M. (1998, Summer) Development, due process, and reduction: Student conduct in the 1990s. *New Directions for Student Services*, 82, 29-37.
- Barnard, W. (2012). Faith and campus culture: Living and learning in the questions. In S. Joeckel & T. Chesnes (Eds.), *The Christian college phenomenon: Inside America's fastest growing institutions of higher learning* (pp. 101-112). Abilene, TX: Abilene Christian University Press.
- Baxter Magolda, M. B., King, P. M., Taylor, K. B., & Wakefield, K. M. (2012). Decreasing authority dependence during the first year of college. *Journal of College Student Development*, 53(3), 418-435.
- Bazeley, P. (2006). The contribution of computer software to integrating qualitative and quantitative data analyses. *Research in the Schools*, 13(1), 64-74.

- Bergen-Cico, D., & Viscomi, J. (2008). Civic aspirations as a protective factor against college students' abuse of alcohol. *Journal of College & Character, 10*(2), 1-14.
- Blimling, G. S. (1998, Summer). Navigating the changing climate of moral and ethical issues in student affairs. *New Directions for Student Services, 82*, 65-75.
- Bostic, D., & Gonzalez, G. (1999). Practices, opinions, knowledge, and recommendations from judicial officers in public higher education. *NASPA Journal, 36*(3), 166-183.
- Bryant, A. N., & Astin, H. S. (2008). The correlates of spiritual struggle during the college years. *The Journal of Higher Education, 79*(1), 1-27.
- Bryant, A. N., Choi, J. Y., & Yasuno, M. (2003) Understanding the religious and spiritual dimensions of students' lives in the first year of college. *Journal of College Student Development, 44*(6), 723-745.
- Bryant, J. L. (2006) Assessing expectations and perceptions of the campus experience: The Noel-Levitz student satisfaction inventory. *New Directions for Community Colleges, 134*, 25-35.
- Burdette, A. M., Ellison, C. G., Hill, T. D., & Glenn, N. D. (2009). "Hooking up" at college: Does religion make a difference? *Journal for the Scientific Study of Religion, 48*(3), 535-551.
- Capeheart-Meningall, J. (2005, Winter). Role of spirituality and spiritual development in student life outside the classroom. *New Directions for Teaching & Learning, 104*, 31-36.
- Casteen, L. D., Gibson, E. M., & Lampkin, P. M. (2007). Fostering moral reflection and perception in college. *Journal of College & Character, 9*(1), 1-8.

- Chickering, A. W., & Reisser, L. (1993). *Education and identity*. San Francisco, CA: Jossey-Bass.
- Chickering, A. W. (2006a). Our orientation. In A. W. Chickering, J. C. Dalton, & L. Stamm (Eds.), *Encouraging authenticity and spirituality in higher education* (pp. 5-36). San Francisco, CA: Jossey-Bass.
- Chickering, A. W. (2006b). Policy issues: Legislative and institutional. In A. W. Chickering, J. C. Dalton, & L. Stamm (Eds.), *Encouraging authenticity and spirituality in higher education* (pp. 97-112). San Francisco, CA: Jossey-Bass.
- Colosse College. (n.d. a). *Restorative discipline training*.
- Colosse College. (n.d. b). *Role of the RA in restorative discipline*.
- Colosse College. (2011). *Discipline letter: Open house violation*.
- Colosse College. (2012). *2012-2013 Student handbook*.
- Cooper, M., & Schwartz, R. (2007). Moral judgment and student discipline: What are institutions teaching? What are students learning? *Journal of College Student Development*, 48(5), 595-607.
- Council for Christian Colleges & Universities. (2011a). About CCCU. Retrieved from <http://www.cccu.org/about>
- Council for Christian Colleges & Universities. (2011b). *CCCU report on spiritual formation*. Washington, DC: Council for Christian Colleges & Universities.
- Council for Christian Colleges & Universities. (2011c). Member application & criteria. Retrieved from http://www.cccu.org/members_and_affiliates/member__affiliate_application__criteria

Council for Christian Colleges & Universities. (2012). Members and affiliates. Retrieved from http://www.cccu.org/members_and_affiliates

Crosby, D. A. (2007). The most important course in the university. *Journal of College & Character*, 9(2), 1-10.

Dalton, J. C. (2006a). Integrating spirit and community in higher education. In A. W. Chickering, J. C. Dalton, & L. Stamm (Eds.), *Encouraging authenticity and spirituality in higher education* (pp. 165-186). San Francisco, CA: Jossey-Bass.

Dalton, J. C. (2006b). The place of spirituality in the mission and work of college student affairs. In A. W. Chickering, J. C. Dalton, & L. Stamm (Eds.), *Encouraging authenticity and spirituality in higher education* (pp. 145-164). San Francisco, CA: Jossey-Bass.

Dalton, J. C. (2006c). Principles and practices for strengthening moral and spiritual growth in college. In A. W. Chickering, J. C. Dalton, & L. Stamm (Eds.), *Encouraging authenticity and spirituality in higher education* (pp. 272-281). San Francisco, CA: Jossey-Bass.

Dalton, J. C., & Crosby, P. C. (2007). Being and having: Shouldn't excellence in higher education (and people) be a measure of what one does rather than what one has? *Journal of College & Character*, 9(1), 1-5.

Dalton, J. C., & Crosby, P. C. (2011). Core values and commitments in college: The surprising return to ethics and character in undergraduate education. *Journal of College & Character*, 12(2), 1-4.

- Dalton, J. C., Eberhardt, D., Bracken, J., & Echols, K. (2006). Inward journeys: Forms and patterns of college student spirituality. *Journal of College & Character*, 7(8), 1-22.
- Dannells, M. (1997). From discipline to development: Rethinking student conduct in higher education. ASHE-ERIC Higher Education Report 25(2). Washington, DC: The George Washington University Graduate School of Education and Human Development.
- Davidson, C. (2009). Transcription: Imperatives for qualitative research. *International Journal of Qualitative Methods*, 8(2), 1-52.
- Duemer, L. S., Delony, S., Donalson, K., & Zaier, A. (2008). Behavioral expectations of 110 national ranked liberal arts colleges. *Journal of College & Character* 10(2), 1-14.
- Ephesus College. (2011). *Discipline letter 3*.
- Ephesus College. (2012a). *2012-2013 Student handbook*.
- Ephesus College. (2012b). *Discipline letter 1*.
- Ephesus College. (2012c). *Discipline letter 2*.
- Ephesus College. (2012d). *RA training manual*.
- Erikson, E. (1968). *Identity: Youth and crisis*. New York, NY: W.W. Norton.
- Freitas, D. (2008). *Sex and the soul: juggling sexuality, spirituality, romance, and religion on America's college campuses*. New York, NY: Oxford University Press.
- Galatia College. (2012). *2012-2013 Student handbook*.

- Gaston-Gayles, J. L., Wolf-Wendel, L. E., Nemeth Tuttle, K., Twombly, S. B., & Ward, K. (2004). From disciplinarian to change agent: How the civil rights era changed the roles of student affairs professionals. *NASPA Journal*, 42(3), 263-282.
- Gay, L. R., Mills, G. E., & Airasian, P. (2006). *Educational research: Competencies for analysis and application* (8th Edition). Upper Saddle River, NJ: Pearson Merrill Prentice Hall.
- Gehring, D. D. (1998). What does the future hold for student judicial affairs? Just discipline? In B. G. Paterson & W. L. Kibler (Eds.), *The administration of campus discipline: Student, organizational and community issues* (pp. 255-267). Asheville, NC: College Administration.
- Gregory, D. E. (1998). Student judicial records, privacy and the press's right to know. In B. G. Paterson & W. L. Kibler (Eds.), *The administration of campus discipline: student, organizational, and community issues* (pp. 55-73). Asheville, NC: College Administration.
- Guthrie, D. S. (1997a). Christian higher education and Christian student affairs. In D. S. Guthrie (Ed.), *Student affairs reconsidered: A Christian view of the profession and its contexts* (pp. 65-77). Lanham, MD: University Press of America.
- Guthrie, D. S. (1997b). Student learning and student affairs. In D. S. Guthrie (Ed.), *Student affairs reconsidered: A Christian view of the profession and its contexts* (pp. 39-63). Lanham, MD: University Press of America.

- Healy, M. A., & Liddell, D. L. (1998, Summer). The developmental conversation: Facilitating moral and intellectual growth in our students. *New Directions for Student Services*, 82, 39-48.
- Higher Education Research Institute. (2004). *The spiritual life of students: A national study of students' search for meaning and purpose*. Retrieved from <http://www.spirituality.ucla.edu/spirituality/reports/>
- Hill, J. P. (2009). Higher education as moral community: Institutional influences on religious participation during college. *Journal for the Scientific Study of Religion*, 48(3), 515-534.
- Hoekema, D. (1994). *Campus rules and moral community: In place of in loco parentis*. Lanham, MD: Rowman & Littlefield.
- Holcomb, G. L., & Nonneman, A. J. (2004). Faithful change: Exploring and assessing faith development in Christian liberal arts undergraduates. *New Directions for Institutional Research*, 122, 93-103.
- Holtschneider, D. H. (2006, November). All the questions: Spirituality in the university. *Journal of College & Character*, 8(1), 1-3.
- Jones, C. E., & Cunion, A. L. (2012). In loco parentis: Strengths, weaknesses, and future directions. In S. Joeckel & T. Chesnes (Eds.), *The Christian college phenomenon: Inside America's fastest growing institutions of higher learning* (pp. 117-126). Abilene, TX: Abilene Christian University Press.

- Kibler, W. L. (1998). Addressing academic dishonesty and promoting academic integrity. In B. G. Paterson & W. L. Kibler (Eds.), *The administration of campus discipline: Student, organizational, and community issues* (pp. 161-175). Asheville, NC: College Administration.
- Kiessling, M. K. (2010). Spirituality as a component of holistic student development: Perspectives and practices of student affairs professionals. *Journal of College & Character, 11*(3), 1-10.
- King, R. H. (2012). Student conduct administration: How students perceive the educational value and procedural fairness of their disciplinary expectations. *Journal of College Student Development, 53*(4), 563-580.
- Lake, P. F. (2009a). *Beyond Discipline*. Bradenton, FL: Hierophant Enterprises.
- Lake, P. F. (2009b). Student discipline: The case against legalistic approaches. *The Chronicle of Higher Education, 55*(32), 31.
- Lau, B. (2002). *Student behavior codes and their impact on campus community: a qualitative study of two Christian liberal arts institutions*. (Unpublished doctoral dissertation). Temple University, Philadelphia, PA.
- Lau, B. (2005). Reasons for student behavior codes: A qualitative study at two Christian liberal arts institutions. *NASPA Journal, 42*, 549-564.
- Leedy, P. D., & Ormrod, J. E. (2005). *Practical research: Planning and design* (8th ed.). Upper Saddle River, NJ: Pearson Merrill Prentice Hall.
- Lowery, J. W. (1998, Summer). Institutional policy and individual responsibility: communities of justice and principle. *New Directions for Student Services, 82*, 15-27.

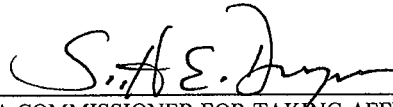
- Loy, B. J., & Painter, W. M. (1997). Student affairs in historical perspective. In D. S. Guthrie (Ed.), *Student affairs reconsidered: A Christian view of the profession and its contexts* (pp. 15-37). Lanham, MD: University Press of America.
- Ma, S. (2003, December). The Christian college experience and the development of spirituality among students. *Christian Higher Education*, 2(4), 321.
- Noel-Levitz. (2011). *Student Satisfaction Inventory*. Retrieved from <https://www.noellevitz.com/student-retention-solutions/satisfaction-priorities-assessments/student-satisfaction-inventory>
- Parks, S. D. (2000). *Big questions, worthy dreams: Mentoring young adults in their search for meaning, purpose and faith*. San Francisco, CA: Jossey-Bass.
- Parks, S. D. (2008). Leadership, spirituality, and the college as a mentoring environment. *Journal of College & Character*, 10(2), 1-9.
- Paterson, B. G. (1998). Expression, harassment and hate speech: Free speech or conduction code violation. In B. G. Paterson & W. L. Kibler (Eds.), *The administration of campus discipline: Student, organizational and community issues* (pp. 113-126). Asheville, NC: College Administration.
- Philippi College. (2004). *Student discipline at Philippi College: Biblical, philosophical, and practical considerations*.
- Philippi College. (2011a). *2011-2012 Student handbook*.
- Philippi College. (2011b). *Discipline letter: Internet 2nd conversation*.
- Philippi College. (2011c). *Discipline letter: Self report*.
- Philippi College. (2011d). *Discipline letter: Suspension 2*.
- Philippi College. (2011e). *Discipline letter: Suspension 3*.

- Philippi College. (2011f). *Residence life handbook information*.
- Philippi College. (2012). *Discipline letter: Probation alcohol*.
- Robson, C. (2002). *Real world research* (2nd ed.). Malden, MA: Blackwell.
- Rockenbach, A. B., Walker, C. R., & Luzader, J. (2012). A phenomenological analysis of college students' spiritual struggles. *Journal of College Student Development*, 53(1), 55-75.
- Sanders, A., & Joeckel, S. (2012). In loco parentis from a student and faculty perspective. In S. Joeckel & T. Chesnes (Eds.), *The Christian college phenomenon: Inside America's fastest growing institutions of higher learning* (pp. 139-149). Abilene, TX: Abilene Christian University Press.
- Schulze, E. M., & Blezien, P. (2012). In loco parentis: an evolving concept. In S. Joeckel & T. Chesnes (Eds.), *The Christian college phenomenon: Inside America's fastest growing institutions of higher learning* (pp. 127-138). Abilene, TX: Abilene Christian University Press.
- Sim, J. (1998). Collecting and analyzing qualitative data: Issues raised by the focus group. *Journal of Advanced Nursing* 28(2), 345-52.
- Smith, C. (2005). *Soul searching: The religious and spiritual lives of American teenagers*. New York, NY: Oxford University Press.
- Smith, C. (2009). *Souls in transition: The religious and spiritual lives of emerging adults*. New York, NY: Oxford University Press.
- Stamm, L. (2006a). The dynamics of spirituality and the religious experience. In A. W. Chickering, J. C. Dalton, & L. Stamm (Eds.), *Encouraging authenticity and spirituality in higher education* (pp. 37-65). San Francisco, CA: Jossey-Bass.

- Stamm, L. (2006b). The influence of religion and spirituality in shaping American higher education. In A. W. Chickering, J. C. Dalton, & L. Stamm (Eds.), *Encouraging authenticity and spirituality in higher education* (pp. 66-92). San Francisco, CA: Jossey-Bass.
- Stat Trek. (2012). Random number generator. Retrieved from <http://stattrek.com/statistics/random-number-generator.aspx>
- Tenelshof, J. (2000, Fall). Spiritual formation: How can Christian education be intentional? *Christian Education Journal*, 4(2), 111-122.
- Thomas, D. T., & Guthrie, D. S. (1997). A framework of understanding. In D. S. Guthrie (Ed.), *Student affairs reconsidered: A Christian view of the profession and its contexts* (pp. 1-13). Lanham, MD: University Press of America.
- Uecker, J. E., Regnerus, M. D., & Vaaler, M. L. (2007). Losing my religion: The social sources of religious decline in early adulthood. *Social Forces*, 85(4), 1667-1692.
- van der Ryn, J. (2007). Thinking and action: Preparing students to engage complexity within themselves and in the world. *Journal of College and Character*, 9(2), 1-13.
- Wagner, J. W. (2008). The practice of community. *Journal of College and Character*, 9(4), 1-6.
- Weldy, A.C. (2009). A thoughtful call for higher moral standards, courtesy of Playboy magazine. *Journal of College & Character*, 10(4), 1-3.
- Welsh, E. (2002). Dealing with data: Using NVivo in the qualitative data analysis process [12]. *Qualitative Social Research [On-line Journal]*, 3(2). Retrieved from <http://www.qualitative-research.net/index.php/fqs/article/view/865/1881>

- Woodfin, C. (2012). Faith and campus culture: Are faculty and students on the same page? In S. Joeckel & T. Chesnes (Eds.), *The Christian college phenomenon: Inside America's fastest growing institutions of higher learning* (pp. 89-100). Abilene, TX: Abilene Christian University Press.
- Zdziarski, E. L. (1998). Alternative dispute resolution: A new look at resolving campus conflict. In B. G. Paterson & W. L. Kibler (Eds.), *The administration of campus discipline: Student, organizational, and community issues* (pp. 237-252). Asheville, NC: Campus Administration.

This is Exhibit "B" referred to in the Affidavit of Dr. Gerald Longjohn, Jr. sworn/affirmed before me at Grand Rapids, in the State of Michigan, this 22 day of July, 2014.



A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE STATE OF MICHIGAN

GERALD A. LONGJOHN, JR.

PROFILE

A Christian higher education professional with proven leadership abilities, cultural intelligence, student rapport, and teaching gifts.

EDUCATIONAL CREDENTIALS

May 2013 **Olivet Nazarene University** Bourbonnais, Illinois
Doctor of Education – Ethical Leadership

Dissertation – “By the Book: Spiritual Formation and Conduct Codes at Selected Christian Universities” (unpublished)

December 2000 **Trinity International University** Deerfield, Illinois
Master of Arts – Christian Education

MA Thesis – “The Educational Use of Computers in Student Ministry” (unpublished)

July 1994 **Moody Bible Institute** Chicago, Illinois
Bachelor of Arts – Bible/Theology

ADDITIONAL STUDIES AND CREDENTIALS

July 1998 **First Baptist Church** Downers Grove, Illinois
Achieved requirements for pastoral license.

PROFESSIONAL EXPERIENCE

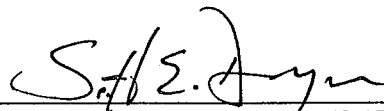
July 2008 - Present **Cornerstone University** Grand Rapids, Michigan
Vice President for Student Development (May 2010 – Present)
Dean of Community Life (August 2009 – April 2010)
Director of Ministry Development (July 2008-July 2009)

July 2004 – June 2008 **Judson University** Elgin, Illinois
Director of Intercultural and Academic Integration (August 2007 – June 2008)
Intercultural and International Advisor (July 2004 – July 2007)

August 1999 – June 2004 **United Christian Church of Dubai** Dubai, UAE
Associate Pastor – Youth and Administration (January 2003 – June 2004)
Youth Pastor (August 1999 – December 2002)

June 1994 – July 1999 **First Baptist Church** Downers Grove, Illinois
Youth Pastor

This is Exhibit "C" referred to in the Affidavit of Dr. Gerald Longjohn, Jr. sworn/affirmed before me at Grand Rapids, in the State of Michigan, this 22 day of July, 2014.

A handwritten signature in cursive script, appearing to read "S. E. Ayer", written over a horizontal line.

A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE STATE OF MICHIGAN

Report Areas of Opinion Requested by Legal Counsel for TWU***1. Is it common for Christian colleges and universities to have codes of conduct?***

(When referring to “Christian colleges and universities”, we refer to liberal arts colleges and universities and not educational institutions that are only Bible schools or seminaries).

It is common and expected for every American college and university to have a code of conduct or handbook that outlines the responsibilities and expectations of both the student and the university (Dannells, 1997; Healy & Liddell, 1998; Hoekema, 1994; Lake, 2009). This document, in one sense, outlines the terms of the university’s contract with the student (Dannells) and serves as “higher education institutions’ way of informing students about the values of the academy as they affect the limits of student behavior and about the consequences of violating those limits” (Dannells, p. 49).

As an example, my original research included accessing the websites of each of the CCCU (Council for Christian Colleges and Universities) institutions in a five state (Michigan, Illinois, Indiana, Wisconsin, and Ohio) region to find their codes of conduct. Each of the universities had a well-established and distributed code of conduct that was updated annually (Longjohn, 2013).

2. What do such codes of conduct normally address? On what are such codes of conduct normally based?

Codes of conduct address a range of issues. Some issues addressed in a code of conduct focus on health, safety, and legal issues such as fire safety (including residence hall furnishing regulations), policies regarding weapons on campus, policies regarding

verbal, physical, and sexual harassment or assault, and privacy and security issues (Lau, 2005). Policies addressed in the student conduct code also address academic expectations including issues related to academic dishonesty and plagiarism (Lau, 2005; Longjohn, 2013).

Codes of conduct within the Christian school context also address expectations that relate to moral standards, behavioral expectations, and other factors that contribute to a healthy campus community. The issues addressed in this category include policies regarding the use of alcohol, tobacco, and illegal drugs, policies related to chapel and church attendance, policies regarding sexual morality and related expectations (including residence hall visitation and cohabitation policies), and policies regarding conflict management and violence (Lau, 2002; Longjohn, 2013).

The basis for some of these guidelines, such as policies regarding underage alcohol and illegal drug use, harassment and assault, privacy guidelines, racism and discrimination, and fire safety, includes relevant federal, state, and municipal laws. For example, in the United States context, the Federal Educational Rights and Privacy Act, the Americans with Disabilities Act, the Civil Rights Act of 1964, and Title IX of the Educational Amendments of 1972 all relate to aspects of an institution's code of conduct.

Policies regarding academic expectations (such as academic dishonesty and plagiarism policies) are usually based in a university's educational mission and ethos, as well as the responsibilities of the university to accrediting bodies.

Christian institutions base aspects of their student conduct codes on specific biblical rationale. This was clearly evidenced in the original research done through my dissertation study, both in the rationale stated in student handbooks and circulated

university materials and in discussions with administrators responsible for conduct code formulation (Longjohn, 2013). Some policies, such as those related to sexual ethics and to violence, assault, and harassment are rooted directly in biblical convictions and core university doctrines. Others are extrapolated from biblical principles, such as university policies regarding chapel attendance or the use of alcohol or tobacco. Lau's (2005) research on rationale for student conduct codes also indicated that some university policies are based on historic denominational commitments, identities, and traditions.

3. What role(s) do(es) such codes of conduct play in the context of Christian colleges and universities?

The literature on this topic indicates that one of the roles codes of conduct play in the context of Christian colleges and universities is to clearly communicate the identity/ethos of the university to campus constituents (Guthrie, 1997; Hoekema, 1994; Lau, 2005). The historic distinctions of the university, as well as its biblical convictions find representation in the policies outlined in the conduct code (Lau). My original research indicated that signing an agreement (whether called the community covenant or the code of conduct) was understood by administrators and students alike as indicative of the signers' commitment to reinforce the values expressed by the covenant in their individual choices (Longjohn, 2013). Students interviewed understood that the policies, even if they disagreed with them, were part of the university's identity (Longjohn).

Codes of conduct also serve to establish a community conducive to moral and spiritual growth in the context of Christian colleges and universities (Lau, 2005; Longjohn, 2013). These environments are intended to be protected from influences that

are detrimental to personal spiritual growth and flourishing and are meant to foster positive spiritual disciplines (Lau; Longjohn). Christian college and university communities can foster spiritual growth by encouraging mutual moral responsibility in the lives of community members (Hoekema, 1994; Longjohn) and the policies expressed in the code of conduct can serve to encourage students toward a life of wisdom (Guthrie, 1997; Longjohn). Codes of conduct can also facilitate moments of restoration and redemption during seasons of struggle, even as students occasionally struggle with the accountability measures related to university policies (Longjohn, 2013).

Additionally, codes of conduct can foster an atmosphere that is conducive to the integration of faith and learning within the context of Christian colleges and universities (Lau, 2005; Longjohn, 2013). The policies outlined in codes of conduct contribute to an environment that is safe and secure for students (Lau) and serve to preserve academic integrity (Lau; Longjohn).

4. After reviewing TWU's Community Covenant, please comment on:

a. The content of the Community Covenant as a "code of conduct".

The TWU Community Covenant is clear, readable, and well aligned with the university's Statement of Faith and Core Values.

For example, the Community Covenant is congruent with the TWU Statement of Faith's reference to the Bible as authoritative:

As the verbally inspired Word of God, the Bible is without error in the original writings, the complete revelation of His will for salvation, and the ultimate authority by which every realm of human knowledge and endeavor shall be judged. Therefore, it is to be believed in all that it teaches, obeyed in all that it requires, and trusted in all that it promises. (TWU Statement of Faith, para. 3)

Additionally, the TWU Community Covenant is well aligned with each of the university's Core Values. Examples of relevant wording from the stated values includes:

- Value - Obeying the authority of Scripture

"...wholeheartedly embraces all the Bible teaches in regard to faith, ethical commitments, and way of life..." (TWU Core Values, para. 2)

- Value - Pursuing faith-based and faith-affirming learning

"...God calls humans to be stewards of His creation, doers of good toward all people, and agents of His reconciliation." (TWU Core Values, para. 3)

- Value - Having a transformational impact on culture

“God calls His followers to influence both individuals and the cultures in which they live and ultimately draw people to Him...” (TWU Core Values, para. 4)

- Value - Servant Leadership as a way of life

“Professors, administrators, and students seek to motivate each other to think and act with creativity, integrity, and skill for the benefit of all concerned.” (TWU Core Values, para. 5)

- Value - Striving for excellence in university education

“Trinity Western promotes not only academic and intellectual excellence, but integrates these with high standards of personal, moral, and spiritual integrity.” (TWU Core Values, para. 6)

- Value - Discipling in Community

“At Trinity Western, students, staff, faculty and administrators are all invited and encouraged to deepen their understanding of what it means to be disciples of Jesus Christ, to practice such discipleship, and to sustain and help others to be and become disciples. They strive to act justly, love mercy, and walk humbly with our God.” (TWU Core Values, para. 7)

b. How the Community Covenant compares with codes of conduct at other Christian colleges and universities of which you are aware.

The TWU Community Covenant is very similar in tone and content to other codes of conduct at Christian colleges and universities of which I am aware. The initial step of identifying potential research sites for my dissertation necessitated reviewing the codes of conduct from 19 CCCU member institutions in a five state region. A list of twelve specific policies, identified as contributing to a university's Christian mission in an earlier study (Lau, 2002) was evaluated during my assessment of conduct code congruence (Longjohn, 2013). Each of these policies were identified in either the Community Covenant or the Student Handbook at Trinity Western and the content of the policies was very congruent with what I observed at the institutions studied in my dissertation. Additionally, TWU's practice of having a covenant that addresses core issues and policies as well as a student handbook that provides additional explanation of university resources and logistical policy issues is congruent with the practices of a number of other Christian colleges and universities.

A content analysis of TWU's Community Covenant showed evidence of each of the spiritually formative categories that factored into my research of both institutional documents and stakeholder perceptions at other researched universities (Longjohn, 2013). TWU's document has a well-stated and helpful emphasis on the role of individual members in contributing to the desired community ethos, an identified goal of student conduct codes (Hoekema, 1994; Longjohn, 2013). For example:

The community covenant is a solemn pledge in which members place themselves under obligations on the part of the institution to its members, the members to the institution, and the members to one another. In making this pledge, members enter

into a contractual agreement and a relational bond. By doing so, members accept reciprocal benefits and mutual responsibilities, and strive to achieve respectful and purposeful unity that aims for the advancement of all, recognizing the diversity of viewpoints, life journeys, stages of maturity, and roles within the TWU community. (TWU Community Covenant, para. 4)

Additionally, the TWU Community Covenant shows clear evidence of the restorative intent that was discovered in my research of student conduct codes at other Christian colleges and universities (Longjohn, 2013). This desire for restoration is explicit in the description of community life at TWU, which states that members of the community commit to, “encourage and support other members of the community in their pursuit of these values and ideals, while extending forgiveness, accountability, restoration, and healing to one another” (TWU Community Covenant, para. 15). It is further expressed when discussing areas for discernment and sensitivity:

TWU is committed to assisting members who desire to face difficulties or overcome the consequences of poor personal choices by providing reasonable care, resources, and environments for safe and meaningful dialogue.
(TWU Community Covenant, para. 26)

c. What benefits, if any, do you expect the Community Covenant would provide to the TWU community.

The initial benefit that I would expect that the Community Covenant provides the TWU community is that it serves as a means of identifying the type of community that participants can expect at Trinity Western. Participants can expect that the community involves a holistic model of Christian education that is biblically rooted, aligned with

historic Christian commitments and moral ethics, and integrated with TWU's stated doctrinal affirmations and core values.

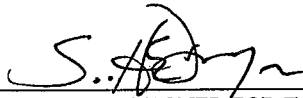
An additional benefit provided by the Community Covenant is that it clearly invites individual participation in and responsibility for the campus community. The Covenant places a high emphasis on mutual moral responsibility for the desired campus community – a community that is protected from influences that are detrimental to personal spiritual growth, a community that fosters personal spiritual discipline and growth in wisdom, and a community that is restorative in nature for individuals who are struggling.

Additionally, I would expect that the Community Covenant benefits the TWU community by safeguarding an atmosphere that is conducive to the integration of faith and learning. It provides for a community that is physically and emotionally safe, a community that is spiritually vibrant, and a community that is academically honest.

Conclusion

It is my opinion as an expert in codes of conduct in Christian colleges and universities in North America that the TWU Community Covenant is well-written and congruent with what I have observed and researched in other Christian colleges and universities. It is clear as it outlines its expectations for how individual members contribute to the campus community and is well-aligned with TWU's stated commitment to biblical authority and core values. I expect that it contributes meaningfully and beneficially to a campus community and culture that is congruent with student expectations and student spiritual growth.

This is Exhibit "D" referred to in the Affidavit of Dr. Gerald Longjohn, Jr. sworn/affirmed before me at Grand Rapids, in the State of Michigan, this 22 day of July, 2014.

A handwritten signature in black ink, appearing to read "S. A. Long", is written over a horizontal line.

A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE STATE OF MICHIGAN

Works Cited

- Council for Christian Colleges & Universities. (2011). *CCCU report on spiritual formation*. Washington, DC: Council for Christian Colleges & Universities.
- Dannells, M. (1997). From discipline to development: Rethinking student conduct in higher education. ASHE-ERIC Higher Education Report 25(2). Washington, DC: The George Washington University Graduate School of Education and Human Development.
- Guthrie, D. S. (1997). Christian higher education and Christian student affairs. In D. S. Guthrie (Ed.), *Student affairs reconsidered: A Christian view of the profession and its contexts* (pp. 65-77). Lanham, MD: University Press of America.
- Healy, M. A., & Liddell, D. L. (1998, Summer). The developmental conversation: Facilitating moral and intellectual growth in our students. *New Directions for Student Services*, 82, 39-48.
- Hoekema, D. (1994). *Campus rules and moral community: In place of in loco parentis*. Lanham, MD: Rowman & Littlefield.
- Lake, P. F. (2009). *Beyond Discipline*. Bradenton, FL: Hierophant Enterprises.
- Lau, B. (2002). *Student behavior codes and their impact on campus community: a qualitative study of two Christian liberal arts institutions*. (Unpublished doctoral dissertation). Temple University, Philadelphia, PA.
- Lau, B. (2005). Reasons for student behavior codes: A qualitative study at two Christian liberal arts institutions. *NASPA Journal*, 42, 549-564.

Longjohn, G. (2013). *By the book: Spiritual formation and conduct codes at selected Christian universities*. (Unpublished doctoral dissertation). Olivet Nazarene University, Bourbonnais, IL.



This is the 1st Affidavit
of William (Bill) Taylor in this case
and was made on July 23, 2014

No. S-142908
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TREVOR LOKE

PETITIONER

AND:

MINISTER OF ADVANCED EDUCATION OF BRITISH COLUMBIA and
TRINITY WESTERN UNIVERSITY

RESPONDENTS

AFFIDAVIT

I, William (Bill) Taylor, Executive Director, of Langley, British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am the Executive Director of the Evangelical Free Church of Canada ("EFCC") and, as such, have personal knowledge of the facts and matters hereinafter deposed to, except where they are stated to be made on information and belief, and as to such facts and matters, I believe them to be true.
2. I make this Affidavit to provide the Court with information on the EFCC and Trinity Western University ("TWU"), which is sponsored by the EFCC in the manner described below. I have reviewed the records of the EFCC that are necessary to provide the historical statements pertaining to the EFCC and TWU that are made in my Affidavit.

Personal Background

3. I am an ordained minister in the EFCC. As Executive Director, I am the most senior EFCC employee and responsible to its board of directors for all of its ministry operations, both within Canada and with respect to its international missionary work. Part of my work is to guide EFCC ministries and leaders toward a common Christian vision. In doing so, I work with the EFCC's district superintendents across Canada and other EFCC ministry leaders. I also oversee the EFCC's mission work overseas.
4. I earned a Bachelor in Religious Education from Briercrest Bible College in 1982. In 1989, I completed a joint honours Bachelor of Arts in History and Philosophy at the University of Waterloo and, in 1990, earned a Master of Arts in British and Canadian History from Wilfred Laurier University.
5. I have completed all but my dissertation towards a PhD in History at the University of Toronto and the University of Saskatchewan. I completed all course work, comprehensive exams and a first draft of my dissertation. An area of my study was the Calvinist/Arminian struggle in early modern England. I also plan to complete a doctorate in Transformational Leadership.
6. I began my pastoral ministry in 1981 as a pastoral intern and was a lay religious worker in various churches from 1983 through 1992. I became a full-time pastor in 1993 and was the Senior Pastor of the Saskatoon Evangelical Free Church from 1993 to 1999.
7. From 1999 through 2007, I was the District Superintendent of the Alberta Parkland Division of the EFCC. In this capacity, I was responsible for recruitment, hiring, ongoing care and development of pastors among other responsibilities.
8. I became the Executive Director of the EFCC in 2008.

EFCC and The Evangelical Free Church of America ("EFCA")

9. The formal name of the EFCC is The Evangelical Free Church of Canada - Eglise Evangelique Libre du Canada. As set out in Article 2.2 of the EFCC Constitution, its purposes are to:

- 2.2** The EFCC shall pursue the following objectives in accord with the above purpose:
- 2.2.1** To call believers to the worship of God, to loving relationships with each other, to edification and disciple making, and to evangelism by word and deeds of compassion.
 - 2.2.2** To establish, incorporate, and strengthen churches in Canada and internationally.
 - 2.2.3** To facilitate fellowship, harmony and co-operation for mutual ministries among congregations, and within this scope provide vision and co-ordination for ministry.
 - 2.2.4** To call believers to an understanding of and commitment to EFCC distinctives as articulated in its articles of faith and in its biblical heritage of personal holiness, congregational polity, and inclusivity.
 - 2.2.5** To call believers to live as responsible godly citizens who are effective in addressing the needs, both social and moral, within society according to the example of Jesus Christ and the Scriptures.
 - 2.2.6** To facilitate cooperation with other fellowships or associations outside the EFCC for the purpose of enhancing Christian ministry in Canada or internationally.
 - 2.2.7** To provide means to educate and train vocational Christian workers and laypersons.
 - 2.2.8** To provide, maintain, or revoke credentials of pastors, missionaries, and other Christian workers, to provide assistance in their placement in the EFCC, and to provide accountability for them for personal life and ministry.
 - 2.2.9** To facilitate the arrangement of churches into districts, or organizational entities as may be required for the realization of the objectives stated herein.
 - 2.2.10** To purchase or receive by gift, lease, or grant, title to such land or property as may be deemed necessary for the realization of the objectives stated herein and to exercise proper stewardship in the maintenance of such properties.
 - 2.2.11** To undertake any other necessary activities related to the accomplishment of the purpose stated in 2.1 above.

Attached as Exhibit "A" to this my Affidavit is a copy of the EFCC Constitution.

10. The EFCC is an association of evangelical Christian churches, united in a common commitment to God's evangel - the gospel of Jesus Christ. These churches are known as members of the Evangelical Free Church denomination and all adhere to the same Statement of Faith. They all use the nomenclature "Evangelical Free Church" as part of their names.
11. There are 163 Evangelical Free Churches in Canada, with a formal membership of approximately 9,000 but with regular Sunday attendance of approximately 21,000. This makes the EFCC a mid-sized Canadian evangelical Christian denomination.
12. Attached as Exhibit "B" to this my Affidavit is a true copy the Statement of Faith of the EFCC and of all Evangelical Free Churches in Canada.
13. The EFCC is affiliated with the Evangelical Free Church of America (the "EFCA"). Our two denominations are closely affiliated. We cooperate in mission enterprises and honour each other's clergy ordination processes. I provide a report to and attend each EFCA national conference. The President of the EFCA provides a report to and attends each EFCC national conference. The EFCA and all of its 1,316 churches and 182 church plants have the same Statement of Faith as the EFCC except for one slight difference (Article 9 of the Statement of Faith of the EFCA is worded slightly differently with respect to the timing of the return of Jesus Christ).
14. I am very familiar with the history of the EFCA, which I understand to be as follows. The EFCA grew out of a number of churches that, by 1884, were sharing a treasury to support missionaries, care for the elderly and establish Bible institutes, new churches and orphanages. The EFCA was formally organized in 1950 as a merger between the Norwegian-Danish and Swedish Evangelical Free Church Associations. As the EFCA, the denomination continued to grow and expanded into Canada.
15. The EFCA churches believed in providing education focused on Biblical truth. In 1897, what was then the Swedish Evangelical Free Church began a ten-week Bible course in

Chicago, which developed into the Bible Institute of The Swedish Evangelical Free Church of America. In 1910, the Norwegian-Danish Free Church Association withdrew from the Chicago Theological Seminary to become an independent Bible institute and academy. These two institutions merged in the 1940s to become what is now Trinity International University (“TIU”) located primarily in Deerfield, Illinois.

16. TIU is now a liberal arts college and also has a divinity school and a graduate school in its primary location in Illinois.
17. TIU also has a law school known as Trinity Law School in Santa Ana, California. Trinity Law School is accredited by the Committee of Bar Examiners of the State Bar of California.
18. TIU remains a denominational university of the EFCA and both TIU and Trinity Law School remain affiliated with EFCA.
19. The EFCC was first incorporated in 1967, but was initially a district of the EFCA and part of the EFCA denomination. In 1984, the EFCC became an autonomous entity in Canada, but remains affiliated with the EFCA as described above.

Statement of Faith and Biblical Marriage and Sexuality

20. The Statement of Faith is comprised of ten statements which set out the essential theological convictions of all EFCC churches. Articles 8 and 9 of the Statement of Faith speak to God’s sanctifying power and purpose, the need to live out our faith in both “word and deed” and to maintain “godly living”.

21. Article 8 of the SOF specifically links belief with behaviour, noting that God's "justifying grace must not be separated from His sanctifying power and purpose." It goes on to declare that "God commands us to love Him supremely and others sacrificially, and to live out our faith with care for one another, compassion toward the poor and justice for the oppressed."
22. Article 9 reminds us that the return of Christ "motivates the believer to godly living, sacrificial service and energetic mission."
23. As expressed in the Statement of Faith, the EFCC works hard to avoid compartmentalizing life between faith (belief) and behaviour. This is consistent with most Christian teaching throughout history.
24. Jesus highlighted that the greatest two commandments were to love God with all your heart, soul and mind, and second, to love your neighbour as yourself (Matthew 22:37-39; Mark 12:30-31). This leads followers of Jesus to live holy lives and to love people through acts and ministries of compassion and to seek to live holy lives.
25. In terms of the first great commandment, Jesus told his followers that if they loved him, then they would obey his commandments (John 14: 15, 20 & 23). Pursuing a holy and godly life is a very important aspect of the commandment to love God with all of our heart, soul and mind.
26. In accordance with Jesus' teaching with respect to the second great commandment, James reminds us that "Pure and genuine religion in the sight of God the Father means caring for orphans and widows in their distress and refusing to let the world corrupt you" (James 1:27). Good works in our communities and with respect to fellow human beings is an important aspect of the commandment to love our neighbours as ourselves.
27. Many of Jesus' teachings and parables show that the manner in which we live our lives provides evidence of our faith and commitment to God. For example, Jesus tells his

disciples in Matthew 7:15-23 that not everyone who claims to know him will enter the kingdom of heaven. He says that he will recognize his children by the fruit of their lives, not by their mere words.

28. There are other examples in which Jesus emphasizes the importance of how we live. Some examples are:

- (a) He tells the parable of the Ten Talents, highlighting how his followers are responsible to invest their talents, not just sit on them (Luke 19).
- (b) He tells the crowds that no one can serve two masters; everyone must make choices to either live for money or for God (Luke 16:13).
- (c) He answers Peter's question regarding how many times one needs to forgive an offender by telling a parable where the punchline is essentially that if we do not forgive others, he will not forgive us (Matthew 18:21-25).
- (d) His famous parable of the Good Samaritan illustrates the truth that if one wants to follow God then one must love ones neighbour, particularly in the context of racial and social differences, which made that parable counter cultural! Jesus asks which person was the real neighbour to the man in need - and then Jesus commands, "Now go and do likewise." (Luke 10:25-37).
- (e) Matthew records Jesus' command to his disciples that they go to all nations making disciples, "teaching them to obey all the things I have commanded" (Matthew 28:18-20).

All of these examples illustrate the fact that Jesus never envisioned a neat compartmentalized faith for his disciples or that they could mentally assent to a set of beliefs that would have no bearing on how they lived. He clearly communicated that following Him required changed behaviour.

29. The apostle Paul routinely spends the first half of his letters speaking of theological realities but then spends the last half fleshing out how those theological truths need to change how we behave in avoiding immorality and in relating to others in loving ways.
30. Hence, we believe that any attempt to separate faith and theological belief from how a believer lives runs counter to God's intent that the truth should set us free and transform our lives. It is an artificial separation, which would render meaningless the great commandments as summarized by Jesus in the texts referenced above.
31. With respect to marriage and sexuality, Jesus had some things to say. In Matthew 19 he answers a question regarding whether divorce is allowable. In his response he made it clear that God's intention was that a man and a woman come together in marriage and that no one should divide what God has joined together.
32. The EFCC teaches that marriage is a divinely sanctioned institution carrying significant theological implications, and which is foundational to God's plan for humanity and to the life of the Church. Attached as Exhibit "C" to this my Affidavit is a document approved by the EFCC board of directors that sets out the EFCC Statement of Marriage and Family, with applicable Biblical references.
33. The EFCC also maintains a Covenant of Personal and Professional Ethics ("EFCC Covenant"), which is applicable to all those serving in EFCC ministries. All of our pastors and missionaries sign and agree to the terms of the EFCC Covenant. It lists and sets out a number of areas in which the EFCC has established behavioural standards based on its Christian teachings. Attached as Exhibit "D" to this my Affidavit is a true copy of the EFCC Covenant.
34. The EFCC Covenant, and similar documents maintained by other Christian organizations, are an attempt to summarize the kind of godly living to which we as a community of Christ-followers aspire. This is much in the same way that Jesus called the community of

his disciples to conduct themselves in his famous Sermon on the Mount in Matthew 5-7. Nothing could be more foreign to a follower of Christ than to be told that one should keep their “personal beliefs” separate from their behaviour.

Trinity Western University (“TWU”)

35. In 1957, the EFCA appointed a committee to explore the establishment of a liberal arts college in the Fraser Valley of British Columbia. This led to the creation of Trinity Junior College in 1962. Trinity Junior College has now become TWU.

36. TWU’s Mission statement is as follows:

The mission of Trinity Western University, as an arm of the Church, is to develop godly Christian leaders: positive, goal-oriented university graduates with thoroughly Christian minds; growing disciples of Christ who glorify God through fulfilling the Great Commission, serving God and people in the various marketplaces of life.

37. One aspect of this Mission statement is that TWU is “an arm of the Church”. Trinity Junior College, and now TWU, was always intended to be, and has always been considered, an arm of the church. This phrase has been part of TWU’s mission statement since it was first articulated in the early 1980s. Attached as Exhibit “E” to this my Affidavit is a copy of document produced by TWU in 1997 providing some explanation of the phrase “arm of the church”.

38. Exhibit “E” explains that TWU serves to be broadly evangelical in its vision for service and that its community is drawn from a variety of similar evangelical Christian denominations who share a common vision of ministry and service. It further states:

However, although interdenominational in service and, in part, in governance, Trinity Western University maintains specific denominational associations with the Evangelical Free Churches of Canada and the United States. It was founded and continues under their authority, with the goal that it should exist as an expression of the heritage and values of those church fellowships. Happily, a core value of those fellowships is to be “broadly inclusive” of the larger evangelical

community, but this aspiration toward inclusion occurs within the context of a clear sense of their own religious identity and doctrine. (Page 7)

39. As this statement indicates, TWU maintains close affiliation with the EFCC and the EFCA. This is expressly stated in TWU's bylaws, indicating the EFCC and the EFCA continue to sponsor TWU. Both the EFCC and the EFCA continue to appoint members to TWU's Board of Governors.
40. TWU's bylaws stipulate that both the President of the EFCA and the Executive Director of the EFCC are members of the Board of Governors of TWU. In my capacity as Executive Director of the EFCC, I am a member of TWU's Board of Governors and also a member of the Governance Committee of TWU, which has the duty of screening and nominating other persons to join the Board of Governors.
41. Additionally, TWU's statement of faith is the same as the Statements of Faith maintained by both the EFCC and the EFCA (with the one minor variation noted in paragraph 13, above). The core values, the vision and the mission of TWU are determined by the central ethos of the EFCC and the EFCA as the sponsoring denomination.
42. TWU's Community Covenant is consistent with the Statement of Faith and its emphasis on "Godly living". Exhibit "E" describes how the mission of TWU as an arm of the Church includes an emphasis on biblical piety and holiness:

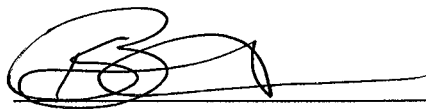
University life should be governed by the principle that Christians must not conform to the pattern of this world, but must be transformed through the renewal of their minds to test and approve what God's will is (Romans 12: 2-3). Trinity Western community members are to take seriously the doctrines of separation and kingdom citizenship which mandate that, although believers are to be involved in the world, they are to set themselves apart from its sinful patterns of thought and behaviours through spiritual renewal, adopting instead a primary personal identification with the kingdom of Heaven. (Page 7)
43. As noted earlier, the Community Covenant is important because it sets out the kind of behaviour that followers of Jesus will aspire to as they seek to follow him and obey his commands. As with the EFCC Covenant, many of the principles of the Community

Covenant could be gleaned from Jesus' own call to his disciples in Matthew 5 to 7 - his famous Sermon on the Mount.

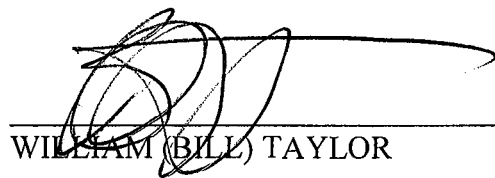
44. Again, codes of conduct like the Community Covenant and the EFCC Covenant are established because we believe that faith and practice are inextricably linked. We expect our pastors to act towards their families and people in their churches in ways that would honour Christ and his call on our lives to obey his commands. If a person fails to sign the EFCC Covenant or acts in ways that violate it, then they cease to be ministry personnel in good standing with the EFCC. Much like all other professional associations, we do not separate what we personally believe from how we expect people to conduct themselves. A code of conduct or covenant is a broadly accepted means of ensuring that those who are part of a community will act in ways that represent their community in accepted ways. The EFCC Covenant is no different except that (like TWU's Community Covenant) it derives its principles and standards for acceptable behaviour from the Bible; especially from the commands of Jesus and the writings of early apostles such as Paul, James and Peter.
45. Within the context of TWU, the Community Covenant is highly relevant to its mission to "develop godly Christian leaders ... with thoroughly Christian minds" and to "growing disciples of Christ". As explained above, the religious principles and teachings on which the EFCC and TWU are founded cannot separate personal belief and conduct. Similarly, TWU would not be advancing its mission as an arm of the Church and an evangelical Christian community if it did not expect the members of its community to pursue personal godliness and develop Christian minds.
46. This is part of the reason that the Community Covenant is expressed, in part, as a commitment and "relational bond" that members of the community make to one another. It is part of a mutual commitment made by all community members to the "person and work of Jesus Christ" to shape TWU as an expressly religious "educational community". Members agree to "strive to live according to biblical precepts, believing that this will optimize the University's capacity to fulfil its mission and achieve its aspirations."

47. Since the EFCC's and TWU's religious teachings cannot differentiate between a commitment to follow Jesus and a commitment to live a godly life, TWU would effectively cease to be an expressly evangelical Christian community if its members did not maintain a mutual commitment to pursue godly Christian living, as taught and understood by the biblical teachings of the EFCC.
48. The EFCC and TWU both hold the view that education is not simply a downloading and memorization of information. University education was historically intended to educate the whole person, including students' characters. The EFCC and TWU continue with this intention, in the context of TWU's Christian ethos. We view education as a holistic attempt to produce graduates who are well formed in character; good citizens who will take their area of study/expertise and apply that knowledge, through good character in a way that redemptively addresses the evil and injustice of this world, consistent with our understanding of biblical truth.
49. To demand that godly character be separated from the educational enterprise at TWU is to ask it to abandon its Christian philosophy of education.

SWORN BEFORE ME at the Township of)
 Langley, in the Province of British)
 Columbia, this 23rd day of July, 2014.)



A Commissioner for taking Affidavits within)
 British Columbia)



WILLIAM (BILL) TAYLOR

Kevin L. Boonstra
 Barrister & Solicitor
 100 - 32160 South Fraser Way
 Abbotsford, BC V2T 1W5
 (604) 864-8877

Evangelical Free Church of Canada

2012 Constitution

Approved by
EFCC



Unity.
Charity.
Jesus Christ.

This is Exhibit "A" referred to in the
affidavit of William Taylor sworn/
affirmed before me at Langley
in the Province of British Columbia, this
25th day of July, 2014

A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE PROVINCE OF BRITISH COLUMBIA

P O Box 350 Langley Stn LCD 1, Langley, BC V3A 8S6
Phone: 604-513-2183 Email: efcc@twu.ca

**EVANGELICAL FREE CHURCH OF CANADA
CONSTITUTION 2012**

002

(As approved at EFCC Conference July 2012, Okotoks, AB)

ARTICLE I - NAME

1. The name of the Corporation shall be THE EVANGELICAL FREE CHURCH OF CANADA - EGLISE EVANGELIQUE LIBRE DU CANADA (Herein after referred to as EFCC).

ARTICLE II - OBJECTIVES

- 2.1 The EFCC shall be an association and fellowship of autonomous and interdependent congregations of like faith and polity whose purpose shall be to glorify God.
- 2.2 The EFCC shall pursue the following objectives in accord with the above purpose:
 - 2.2.1 To call believers to the worship of God, to loving relationships with each other, to edification and disciple making, and to evangelism by word and deeds of compassion.
 - 2.2.2 To establish, incorporate, and strengthen churches in Canada and internationally.
 - 2.2.3 To facilitate fellowship, harmony and co-operation for mutual ministries among congregations, and within this scope provide vision and co-ordination for ministry.
 - 2.2.4 To call believers to an understanding of and commitment to EFCC distinctives as articulated in its articles of faith and in its biblical heritage of personal holiness, congregational polity, and inclusivity.
 - 2.2.5 To call believers to live as responsible godly citizens who are effective in addressing the needs, both social and moral, within society according to the example of Jesus Christ and the Scriptures.
 - 2.2.6 To facilitate cooperation with other fellowships or associations outside the EFCC for the purpose of enhancing Christian ministry in Canada or internationally.
 - 2.2.7 To provide means to educate and train vocational Christian workers and laypersons.
 - 2.2.8 To provide, maintain, or revoke credentials of pastors, missionaries, and other Christian workers, to provide assistance in their placement in the EFCC, and to provide accountability for them for personal life and ministry.
 - 2.2.9 To facilitate the arrangement of churches into districts, or organizational entities as may be required for the realization of the objectives stated herein.
 - 2.2.10 To purchase or receive by gift, lease, or grant, title to such land or property as may be deemed necessary for the realization of the objectives stated herein and to exercise proper stewardship in the maintenance of such properties.
 - 2.2.11 To undertake any other necessary activities related to the accomplishment of the purpose stated in 2.1 above.

ARTICLE III – STATEMENT OF FAITH

The Evangelical Free Church of Canada is an association of autonomous churches united in a common commitment to God's evangel--the gospel of Jesus Christ, who died and rose again to give us eternal life. To God's glory, the gospel is the power of God for the salvation of everyone who believes. Our essential theological convictions are vitally connected to this gospel.

*God's gospel originates in and expresses the wondrous perfections
of the eternal, triune God.*

3.1 We believe in one God, Creator of all things, holy, infinitely perfect, and eternally existing in a loving unity of three equally divine Persons: the Father, the Son and the Holy Spirit. Having limitless knowledge and sovereign power, God has graciously purposed from eternity to redeem a people for Himself and to make all things new for His own glory.

God's gospel is authoritatively revealed in the Scriptures.

3.2 We believe that God has spoken in the Scriptures, both Old and New Testaments, through the words of human authors. As the verbally inspired Word of God, the Bible is without error in the original writings, the complete revelation of His will for salvation, and the ultimate authority by which every realm of human knowledge and endeavour should be judged. Therefore, it is to be believed in all that it teaches, obeyed in all that it requires, and trusted in all that it promises.

God's gospel alone addresses our deepest need.

3.3 We believe that God created Adam and Eve in His image, but they sinned when tempted by Satan. In union with Adam, human beings are sinners by nature and by choice, alienated from God, and under His wrath. Only through God's saving work in Jesus Christ can we be rescued, reconciled and renewed.

God's gospel is made known supremely in the Person of Jesus Christ.

3.4 We believe that Jesus Christ is God incarnate, fully God and fully man, one Person in two natures. Jesus—Israel's promised Messiah—was conceived through the Holy Spirit and born of the virgin Mary. He lived a sinless life, was crucified under Pontius Pilate, arose bodily from the dead, ascended into heaven and sits at the right hand of God the Father as our High Priest and Advocate.

God's gospel is accomplished through the work of Christ.

3.5 We believe that Jesus Christ, as our representative and substitute, shed His blood on the cross as the perfect, all-sufficient sacrifice for our sins. His atoning death and victorious resurrection constitute the only ground for salvation.

God's gospel is applied by the power of the Holy Spirit.

3.6 We believe that the Holy Spirit, in all that He does, glorifies the Lord Jesus Christ. He convicts the world of its guilt. He regenerates sinners, and in Him they are baptized into union with Christ and adopted as heirs in the family of God. He also indwells, illuminates, guides, equips and empowers believers for Christ-like living and service.

God's gospel is now embodied in the new community called the church.

3.7 We believe that the true church comprises all who have been justified by God's grace through faith alone in Christ alone. They are united by the Holy Spirit in the body of Christ, of which He is the Head. The true church is manifest in local churches, whose membership should be composed only of believers. The Lord Jesus mandated two ordinances, baptism and the Lord's Supper, which visibly and tangibly express the gospel. Though they are not the means of salvation, when celebrated by the church in genuine faith, these ordinances confirm and nourish the believer.

God's gospel compels us to Christ-like living and witness to the world.

3.8 We believe that God's justifying grace must not be separated from His sanctifying power and purpose. God commands us to love Him supremely and others sacrificially, and to live out our faith with care for one another, compassion toward the poor and justice for the oppressed. With God's Word, the Spirit's power, and fervent prayer in Christ's name, we are to combat the spiritual forces of evil. In obedience to Christ's commission, we are to make disciples among all people, always bearing witness to the gospel in word and deed.

God's gospel will be brought to fulfillment by the Lord Himself at the end of this age.

3.9 We believe in the personal, bodily and glorious return of our Lord Jesus Christ with His holy angels when He will bring His kingdom to fulfillment and exercise His role as Judge of all. This coming of Christ, at a time known only to God, demands constant expectancy and, as our blessed hope, motivates the believer to godly living, sacrificial service and energetic mission.

God's gospel requires a response that has eternal consequences.

3.10 We believe that God commands everyone everywhere to believe the gospel by turning to Him in repentance and receiving the Lord Jesus Christ. We believe that God will raise the dead bodily and judge the world, assigning the unbeliever to condemnation and eternal conscious punishment and the believer to eternal blessedness and joy with the Lord in the new heaven and the new earth, to the praise of His glorious grace. Amen.

ARTICLE IV – HOME OFFICE

4. The Home Office of the EFCC shall be in the municipality of Langley, in the Province of British Columbia at such place therein as the Directors of the EFCC may from time to time by resolution determine.

ARTICLE V - SEAL

5. The seal shall be in the custody of the Secretary of the EFCC or at the Home Office.

ARTICLE VI – MEMBERSHIP

6.1 Membership - Membership in the EFCC shall consist of those churches in Canada who are affiliated with the Evangelical Free Church of Canada through one of its recognized Districts or organizational entities.

6.2 Admission of Members - Churches become members of the EFCC when they adopt the Statement of Faith of the Evangelical Free Church of Canada, and when they are approved by a recognized District or organizational entity established by the EFCC.

6.3 Discipline of Members - Discipline of members shall be the responsibility of the respective District or organizational entity.

6.4 Termination of Membership - A member church can terminate its membership in the EFCC by local church decision and by written notification to the District or organizational entity to which the church is a member.

ARTICLE VII - MEETING OF MEMBERS

7.1 EFCC Conference - The Conference shall be the governing body of the EFCC. The place and date of Conference shall be determined by a previous Conference or by the Directors as authorized by such Conference.

7.2 Notification - Member churches shall be sent written notice of the place, date, time and agenda of the Conference at least sixty (60) days before it convenes. In the event member churches may have inadvertently failed to receive such notice, resolutions passed and business conducted at the Conference shall not be invalidated. Notice of any meeting where special business will be transacted shall contain sufficient information to permit the member church to form a reasoned judgement on the decision to be taken.

7.3 Representation -

7.3.1 All voting delegates at Conference must be members in good standing of an EFCC Church. All voting delegates shall present proper credentials to the Committee on Credentials at the Conference. In the event of a dispute as to the decision of said Committee, the matter shall be resolved by the Conference. Each delegate entitled to vote at the Conference shall have the right to exercise such vote until the next Conference unless that right is rescinded by the delegate's church. In such event, the church shall be entitled to appoint a new delegate.

7.3.2 Each member church is entitled to representation and vote at the Conference by four (4) delegates for the first fifty (50) or fraction thereof of its members and one (1) delegate for each additional fifty (50) or fraction thereof of its members to a maximum total of eight (8) and a maximum of three (3) credentialed ministry personnel.

7.3.3 In addition, the Directors and Officers of the EFCC, the Superintendent (or Representative) of each District or organizational entity, the Director of the Evangelical Free Church of Canada Mission (herein after referred to as EFCCM), and all EFCC Career Missionaries who meet the qualifications of 7.3.1., shall be entitled to vote at the Conference.

7.4 Quorum - Representation from one-third (1/3) of the member churches shall constitute a quorum.

7.5 The Board of Directors shall call a special general meeting of members on written requisition of members carrying not less than 5% of the voting rights.

ARTICLE VIII - DIRECTORS

8.1 The affairs of the EFCC shall be managed by the Board of Directors.

8.2 Composition & Election - The Board of Directors shall consist of:

8.2.1 A Chairperson, Vice-Chairperson, and Finance Chairperson.

8.2.2 Three (3) additional members elected by the Conference for a two (2) year term

8.2.3 A District Superintendent appointed by the National Mission Leadership Team (herein after referred to as NMLT) for a term of two (2) years. This member may only be re-appointed to this position once.

8.2.4 The Chairperson of the International Mission Committee (herein after referred to as IMC).

8.2.5 The Board of Directors may also appoint one additional member for a term of two (2) years. This member may only be re-appointed to this position once.

8.2.6 All non-salaried board members shall be elected by the Conference for a two (2) year term. They may be re-elected twice (for a maximum total of six (6) consecutive years).

8.2.7 All board members elected or appointed shall be members in good standing of an EFCC Church.

8.3 Organization:

8.3.1 The Board of Directors shall elect a secretary from among its members.

8.3.2 The Board of Directors may organize committees as it deems helpful in carrying out its responsibilities. Such committees shall be appointed by the Chairperson and ratified by the Board. Persons with specialized expertise or background from outside the Board should be included in such appointments.

8.4 Responsibilities and Accountability of the Board of Directors:

- 8.4.1** Shall uphold the ministry of the EFCC through individual and corporate prayer and support.
- 8.4.2** Shall oversee the work of the EFCC on behalf of the Conference, setting vision and policies to govern the EFCC and the Executive Director in his management of the EFCC.
- 8.4.3** Shall monitor and regularly evaluate the mission, strategies, and goals of the EFCC.
- 8.4.4** Shall exercise responsibility for the fiscal policies and practices of the EFCC.
- 8.4.5** Shall approve a proposed agenda and budget for recommendation to Conference.
- 8.4.6** Shall by at least a two-thirds (2/3) vote, borrow money as necessary for the purposes of the EFCC.
- 8.4.7** Shall review annually the performance and compensation of the EFCC Executive Director with input from appropriate teams and committees.
- 8.4.8** Shall be accountable to the Conference. Committees shall be accountable to the EFCC Board of Directors.
- 8.4.9** Shall assume office at the adjournment of Conference at which they are elected.
- 8.4.10** Shall receive all reports to Conference of the EFCC, and examine and approve any requests for appropriation before they are presented to the said Conference.
- 8.4.11** Shall monitor and evaluate the Executive Director's management of the Home Office of the EFCC.
- 8.4.12** May appoint replacements to the Board of Directors in the event that a vacancy is created between conferences.
- 8.4.13** Shall meet and make decisions that best serve the interests of the EFCC in the event that urgent matters, financial or otherwise, arise within the EFCC between Conferences.
- 8.4.14** Shall approve all suitable candidates that are presented to fill Board of Director and Committee vacancies, making every reasonable effort to reflect the full geographic, cultural and gender diversity of the EFCC.
- 8.4.15** The directors and officers shall indicate their agreement with the EFCC Statement of Faith, in writing, as a condition of election and appointment to office and annually thereafter.
- 8.4.16** The Board of Directors Chair and Secretary shall sign the version of Board Meeting Minutes that is approved by the Board of Directors. This copy shall be kept as a permanent record of the charity.

8.5 Removal of Directors - The members of the EFCC may, by resolution passed by at least two-thirds (2/3) of the votes cast at a meeting of which notice specifying the intention to pass such resolution has been given, remove any director before the expiration of his/her term of office and may, by a majority of votes cast at such meeting, elect any person in his/her stead for the remainder of his/her term.

8.6 Remuneration of Directors - The Directors of the EFCC shall serve without remuneration except as otherwise provided by the members at EFCC Conference. No Director shall directly or indirectly receive any profit from his/her position as such, provided that a Director may be paid reasonable expenses incurred by him/her in the performance of his/her duties.

ARTICLE IX - MEETING OF DIRECTORS

9.1 Place of Meeting and Notice - Meetings of the Board of Directors may be held at any place within Canada. A meeting of Directors may be convened by the Chairperson or Vice-Chairperson, or by the Secretary at the request of the Chairperson or the Vice-Chairperson. The Directors may by resolution determine to hold regular meetings of the Directors and set dates and times for them.

9.2 Written notice of any meeting of the Directors shall be given to each director not less than two (2) weeks before the meeting is to take place. Meetings of the Board of Directors may be held at any time without formal notice if all the Directors are present, or those absent have waived notice or have signified their consent in writing to the meeting being held in their absence.

9.3 Voting - Questions arising at any meeting shall be decided by a majority of votes, unless otherwise specified by statute or bylaws. Exceptions to this shall be questions dealing with the borrowing of money (see 8.4.6) and the removal of directors (see 8.5) and elected salaried executive positions.

9.4 Quorum

9.4.1 A majority of the directors present at any meeting of the Board of Directors shall constitute a quorum.

ARTICLE X - OFFICERS

10.1 Officers of EFCC - The Board of Directors shall be the Officers of EFCC, and shall then be subject to the terms and conditions of office as set forth for Directors in Article VII.

10.2 Delegation of Duties of Officers - In case of the absence or inability to act of the Chairperson, Vice-

Chairperson, or any other officer of EFCC, the Directors may delegate all or any of the powers of such officer to any other officer for the time being.

006

10.3 Chairperson - The Chairperson shall, when present, chair all meetings of the directors and members, shall sign such contracts, documents or instruments in writing as require the Chairperson's signature and shall have such other powers and duties as may from time to time be assigned, or as are incidental to the office. The Chairperson shall, in the absence or disability of the Executive Director, perform the duties and exercise the powers of the Executive Director that are necessary during such absence or disability.

10.4 Vice-Chairperson - The Vice-Chairperson shall be vested with all the powers and shall perform all the duties of the Chairperson in the absence or inability or refusal to act of the Chairperson. The Vice-Chairperson shall sign such contracts, documents or other instruments in writing as require the Chairperson's signature and shall have such other powers and duties as may from time to time be assigned. The Vice-Chairperson shall be Chairperson of the Nominations and Search Committees.

10.5 Secretary - The Secretary shall supervise the recording, custody, publication and distribution of the Minutes of Conference and Board of Directors' Meetings. The Secretary shall keep a record of all officers and committee members and of the expiration of their several terms of office, or membership. The Secretary shall sign such contracts, documents or instruments in writing as require such signature.

ARTICLE XI - COMMITTEES

11.1 Constitution of Committees - The members of the EFCC at any general meeting, or the Board of Directors, may from time to time constitute such committees as deemed necessary and shall elect or appoint the members of such committees and prescribe their duties. The Executive Director shall be an ex-officio member of each such committee. The committees may meet for the transaction of business, adjourn, and otherwise regulate their meetings as they deem necessary, and shall conform to any and all policies prescribed to them. Questions arising at any meeting of a committee shall be decided by a majority of votes and in case of an equality of votes the Chairperson of the Committee shall have a second or casting vote.

11.1.1 Removal of Committee Members – The members of the Corporation may, by resolution passed by at least two-thirds (2/3) of the votes cast at a general meeting of which notice specifying the intention to pass such resolution has been given, remove any committee member before the expiration of his/her term of office and may, by a majority of votes cast at such meeting, elect any person in his/her stead for the remainder of his/her term.

11.1.2 Remuneration of Committee Members – Committee members of the Corporation shall serve without remuneration except as otherwise provided by the members at Conference. No committee member shall directly or indirectly receive any profit from his/her position as such; provided that a member may be paid reasonable expenses incurred by him/her in the performance of his/her duties.

11.2 Conference Credentialing Committee: There shall be a Conference Committee on Credentials, the membership of which shall be decided by the Board of Directors acting for Conference in preparation for Conference.

11.3. Finance and Audit Committee

11.3.1 The Committee shall consist of:

11.3.1.1. A Chairperson elected by Conference for a two (2) year term. The Chairperson may be re-elected twice for a maximum of six (6) consecutive years. The Chairperson shall be a member of the Board of Directors. The Chairperson shall be responsible for the general administration of all funds of the EFCC and report on the same to the Conference and the Board of Directors as requested. The Board of Directors will appoint at least two (2) other Board members to the Finance & Audit Committee.

11.3.1.2 A Financial Secretary appointed by the Board of Directors annually. The Financial Secretary office shall be responsible for the receiving and recording of all receipts to the EFCC. This position shall be responsible to see that all funds of the EFCC are deposited in the name of the EFCC in such bank or banks or with such depository or depositories as the Board of Directors shall direct. The Financial Secretary shall keep such records as are necessary in the performance of the duties and shall be accountable to the Finance Committee Chairperson. The Financial Secretary shall give such bond or security as the Board of Directors may require, and shall sign all contracts, documents or instruments in writing as require such signature and shall have such other powers and duties as may from time to

time be assigned or as are incidental to the office.

11.3.1.3 A Treasurer appointed by the Board of Directors annually. The Treasurer shall serve as treasurer for all departments of the EFCC, except those that are separately incorporated. The Treasurer shall be responsible for the disbursement of funds in accordance with the directions of the Conference or Board of Directors may require. The Treasurer shall sign all contracts, documents or instruments in writing as require such signature and shall have such other powers and duties as may from time to time be assigned or as are incidental to the office.

11.3.1.4 Any additional members which the Board of Directors from time to time may deem necessary and appoint to the same.

11.3.2 The Committee shall monitor the financial account and reporting process and the integrity of the EFCC's financial statements and its internal control, review proposed budgets, attend annual meetings with the auditors and ensure that all required government reports are filed.

11.4 Nominations Committee:

11.4.1 The Committee shall consist of five (5) members. Conference shall elect four (4) members for a two (2) year term. These members may be re-elected twice (for a maximum of six (6) consecutive years). The Vice-Chairperson of the Board of Directors shall be the fifth member and will serve as Chairperson of the Committee.

11.4.2 At least six (6) months before Conference this Committee shall contact and encourage member churches to submit to the Committee the names of suitable candidates for Board and Committee vacancies as set forth in these bylaws.

11.4.3 This Committee shall obtain a recommendation for each nominee from the local Evangelical Free Church of which that nominee is a member.

11.4.4 This Committee shall endeavour to present the most qualified candidate(s) for each elected office, and must make every reasonable effort to reflect the full geographic, cultural, and gender diversity of the EFCC.

11.4.5 This Committee shall present a slate of nominees along with a brief biography of each nominee to member churches at least sixty (60) days before Conference.

11.4.6 No provision will be made for nominations from the floor at Conference.

11.5 Ministerial Standing Committee

11.5.1.1 The Ministerial Standing Committee shall consist of five (5) members; the Executive Director of the EFCC(ex-officio), one (1) District Superintendent, appointed by the District Superintendent's Council, and three (3) mature and experienced individuals, consisting of two (2) ministers and one (1) layperson elected by Conference for two (2) year terms. Elected members may be re-elected twice (for a maximum of six (6) consecutive years). The Committee shall choose a Chairperson and Vice-Chairperson.

11.5.2 The Committee shall be responsible to grant licenses and approval for ordination to candidates who desire credentialing in the name of the Evangelical Free Church of Canada and who qualify in accordance with the current Credentialing Procedures for the EFCC.

11.5.3 The Committee shall be responsible to examine (under guidelines established by Conference) licensed and ordained ministers whose belief or conduct is brought into question by official action of a Church Board and District Board, and to request Conference to revoke and/or restore such credentialing, as consistent with the policies, procedures, and credentialing standards of the EFCC.

11.6 Search Committee:

11.6.1 Each time a salaried executive position is to be filled, a Search Committee shall be formed for that position.

11.6.1.1 For the elected position of Executive Director of EFCC, the Search Committee shall be comprised of six (6) members, including the Vice-Chairperson of the Board of Directors (who shall be the Chairperson of the Committee), one (1) District Superintendent or Representative, one (1) additional member of the NMLT, two (2) members of the IMC and one (1) person who shall be appointed by the Board of Directors.

11.6.1.2 They shall recommend to the Board of Directors for presentation to the Conference a qualified candidate for Executive Director. A three-quarters (3/4) majority vote shall be required to constitute an election.

11.6.2 Each time a hired executive position is to be filled, a Search Committee shall be formed for that position.

11.6.2.1 For the position of Director of EFCCM, the Search Committee shall be comprised of five (5) members, including the Vice Chairperson of the Board of Directors (who shall be the Chairperson of the Committee), two (2) members of the IMC, one (1) District Superintendent and one (1) person who shall be

appointed by the Board of Directors. They shall recommend to the Board of Directors to hire a qualified candidate for Director of EFCCM.

008

11.6.2.2 For the position of Director of National Missions, the Search Committee shall be comprised of five (5) members, including the Vice Chairperson of the Board of Directors (who shall be the Chairperson of the Committee), one (1) District Superintendent or Representative, one (1) additional member of the NMLT, one (1) member of the IMC, plus one (1) person who shall be appointed by the Board of Directors. They shall recommend to the Board of Directors to hire a qualified candidate for Director of National Missions.

11.7 International Mission Committee (IMC)

11.7.1 The IMC shall consist of at least three (3) members.

11.7.2 The Conference will elect an IMC Chairperson, who has competency in international missions, for a two (2) year term. The Chair may be re-elected twice for a maximum of six (6) consecutive years.

11.7.3 The Chairperson will present at least two (2) additional members, for approval of the Board of Directors, who shall form the balance of the Committee.

11.7.4 In addition, The Executive Director and the EFCCM Director will regularly meet with the Committee.

11.7.5 The Committee will be responsible to advise the Board of Directors regarding all matters pertaining to EFCC International Mission policy and to report compliance of same.

11.8 National Mission Committee (NMC)

11.8.1 The National Mission Committee shall consist of at least three (3) members.

11.8.2 The Conference will elect a NMC Chairperson, who has competency in national missions, for a two (2) year term. The Chair may be re-elected twice for a maximum of six (6) years.

11.8.3 The Chairperson will present at least two (2) additional members, for approval of the Board of Directors, who shall form the balance of the Committee.

11.8.4 In addition, the Executive Director and the National Mission Director will regularly meet with the Committee.

11.8.5 The Committee will be responsible to advise the Board of Directors regarding all matters pertaining to EFCC National Mission policy and to report compliance of same.

11.9 Other Committees may be formed and dissolved by the Board of Directors as the need arises.

ARTICLE XII – EVANGELICAL FREE CHURCH OF CANADA MINISTRIES

12.1 The Evangelical Free Church of Canada Mission (EFCCM) serves as the international arm of the EFCC.

12.2 The Evangelical Free Church of Canada National Mission serves as the national arm of the EFCC.

12.3 Executive Director - The Executive Director shall provide spiritual and administrative leadership in reaching the objectives of the EFCC ministries, nationally and internationally. He shall be accountable to the churches of the EFCC through Conference, and on an ongoing basis through the Board of Directors, achieving its agreed upon ends. He shall oversee the staff and ministries of the EFCCM. He shall provide reports to the Board of Directors on the activities of the Denomination, future requirements, and projected goals. He shall communicate regularly with the constituency and be available for spiritual and instructional ministry. He shall co-ordinate the work between the Districts or organizational entities in the formulation and realization of national policies and projects as well as co-ordinating the various departments of ministry. He shall officially represent the EFCC to District Organizations, EFCC Women's Ministries, the Evangelical Free Church of America, and other affiliate organizations. He shall be ex-officio of all committees, and affiliate organizations of the EFCC, other than the Search Committee for the Executive Director.

12.4 Director of the EFCC International Mission - The Director of the EFCC International Mission shall be hired by the EFCC Board of Directors to give oversight to the EFCC International Mission and will be accountable to the EFCC Executive Director.

12.5 Director of the EFCC National Mission – The Director of the EFCC National Mission shall be hired by the EFCC Board of Directors to give oversight to National Missions (Canada) and will be accountable to the EFCC Executive Director.

ARTICLE XIII - RELATIONSHIPS

13.1 The EFCC will cooperate with the Evangelical Free Church of America (EFCA), the International Federation of Free Evangelical Churches (IFFEC), Trinity Western University (TWU) and Trinity Western Seminary (TWS) and other organizations where such cooperation will further the objectives of the EFCC.

ARTICLE XIV - CHEQUES, DRAFTS, NOTES, ETC.

14. Contracts, documents or instruments in writing requiring the signature of the EFCC may be signed by the Executive Director, Chairperson, or Vice-Chairperson together with the Secretary, Chairperson of Finance, or another Director, as authorized by resolution of the members of EFCC. The corporate seal of EFCC may be required to be affixed to contracts, documents or instruments in writing signed as aforesaid. The Executive Director, Chairperson, or the Vice-Chairperson together with the Secretary, Chairperson of Finance, or other Director, as authorized by resolution of the members of the EFCC, are authorized to sell, assign, transfer, exchange, convert or convey any and all shares, bonds, debentures, rights, warrants or other securities owned by or registered in the name of the EFCC, and to sign and execute under the corporate seal of the EFCC or otherwise all assignments, transfers, conveyances, powers of attorney and other instruments that may be necessary for the purpose of selling, assigning, transferring, exchanging, converting or conveying any such shares, bonds, debentures, rights, warrants or other securities as authorized by resolution of the members of the EFCC.

ARTICLE XV - ENACTMENT REPEAL OR AMENDMENT OF BYLAWS

15. The enactment of bylaws in addition or supplemental hereto or the repeal or amendment of any bylaws herein set out or subsequently enacted may be effected or adopted by the EFCC at any Conference or special general meeting convened for that purpose, upon the passage of a resolution by at least three-quarters (3/4) of the votes cast; provided that every member church has been notified of the specific changes sixty (60) days in advance, and provided however, that the enactment, repeal or amendment of any bylaw or bylaws not embodied in the Letters Patent shall not be enforced or acted upon until the approval of the Minister of Industry has been obtained.

ARTICLE XVI - INTERPRETATION

16. In all by-laws and special resolutions of the EFCC, the singular shall include the plural and the plural the singular, the word "person" shall include firms and corporations and the masculine shall include the feminine. Whenever reference is made in any bylaws or any special resolution of the EFCC to any statute or section thereof, such reference shall be deemed to extend and apply to any amendment or re-enactment of such statute or section thereof, as the case may be.

ARTICLE XVII - CLERGY- LAYPERSON RATIO

17. The EFCC shall strive to elect or appoint at least fifty percent (50%) laypeople to any and all boards and committees, unless otherwise specified.

ARTICLE XVIII – AUDIT OF ACCOUNTS AND APPOINTMENT OF AUDITORS

18. The members of the Corporation shall at each Conference appoint a duly qualified and recognized accountant as Auditor for the next two (2) year term. All accounts shall be audited and a financial statement of the Corporation, auditor's report and such other information or reports relating to the Corporation's affairs as the Directors may determine, shall be submitted to the Board of Directors and presented to such general meeting of the members of the Corporation.

ARTICLE XIX - DISSOLUTION CLAUSE

19. In the event of the dissolution of the Evangelical Free Church of Canada, any assets of the organization remaining thereafter shall be conveyed by Conference duly called at the time of the dissolution to qualified donees only, which by a decision of the members of the Conference are best fitted to carry on the objectives closely allied to the EFCC. No dissolution of the EFCC may be accomplished without two-thirds (2/3) vote of the registered members of Conference.

This is Exhibit "B" referred to in the
affidavit of William Taylor sworn/
affirmed before me at Lashby
in the Province of British Columbia, this
23rd day of July, 2014



A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE PROVINCE OF BRITISH COLUMBIA

Evangelical Free Church of Canada
STATEMENT of FAITH

The Evangelical Free Church of Canada is an association of autonomous churches united in a common commitment to God's evangel--the gospel of Jesus Christ, who died and rose again to give us eternal life. To God's glory, the gospel is the power of God for the salvation of everyone who believes. Our essential theological convictions are vitally connected to this gospel.

*God's gospel originates in and expresses the wondrous perfections of
the eternal, triune God.*

1. We believe in one God, Creator of all things, holy, infinitely perfect, and eternally existing in a loving unity of three equally divine Persons: the Father, the Son and the Holy Spirit. Having limitless knowledge and sovereign power, God has graciously purposed from eternity to redeem a people for Himself and to make all things new for His own glory.

God's gospel is authoritatively revealed in the Scriptures.

2. We believe that God has spoken in the Scriptures, both Old and New Testaments, through the words of human authors. As the verbally inspired Word of God, the Bible is without error in the original writings, the complete revelation of His will for salvation, and the ultimate authority by which every realm of human knowledge and endeavour should be judged. Therefore, it is to be believed in all that it teaches, obeyed in all that it requires, and trusted in all that it promises.

God's gospel alone addresses our deepest need.

3. We believe that God created Adam and Eve in His image, but they sinned when tempted by Satan. In union with Adam, human beings are sinners by nature and by choice, alienated from God, and under His wrath. Only through God's saving work in Jesus Christ can we be rescued, reconciled and renewed.

God's gospel is made known supremely in the Person of Jesus Christ.

4. We believe that Jesus Christ is God incarnate, fully God and fully man, one Person in two natures. Jesus — Israel's promised Messiah — was conceived through the Holy Spirit and born of the virgin Mary. He lived a sinless life, was crucified under Pontius Pilate, arose bodily from the dead, ascended into heaven and sits at the right hand of God the Father as our High Priest and Advocate.

God's gospel is accomplished through the work of Christ.

5. We believe that Jesus Christ, as our representative and substitute, shed His blood on the cross as the perfect, all-sufficient sacrifice for our sins. His atoning death and victorious resurrection constitute the only ground for salvation.

God's gospel is applied by the power of the Holy Spirit.

6. We believe that the Holy Spirit, in all that He does, glorifies the Lord Jesus Christ. He convicts the world of its guilt. He regenerates sinners, and in Him they are baptized into union with Christ and adopted as heirs in the family of God. He also indwells, illuminates, guides, equips and empowers believers for Christ-like living and service.

God's gospel is now embodied in the new community called the church.

7. We believe that the true church comprises all who have been justified by God's grace through faith alone in Christ alone. They are united by the Holy Spirit in the body of Christ, of which He is the Head. The true church is manifest in local churches, whose membership should be composed only of believers. The Lord Jesus mandated two ordinances, baptism and the Lord's Supper, which visibly and tangibly express the gospel. Though they are not the means of salvation, when celebrated by the church in genuine faith, these ordinances confirm and nourish the believer.

Initial _____

God's gospel compels us to Christ-like living and witness to the world.

8. We believe that God's justifying grace must not be separated from His sanctifying power and purpose. God commands us to love Him supremely and others sacrificially, and to live out our faith with care for one another, compassion toward the poor and justice for the oppressed. With God's Word, the Spirit's power, and fervent prayer in Christ's name, we are to combat the spiritual forces of evil. In obedience to Christ's commission, we are to make disciples among all people, always bearing witness to the gospel in word and deed.

God's gospel will be brought to fulfillment by the Lord Himself at the end of this age.

9. We believe in the personal, bodily and glorious return of our Lord Jesus Christ with His holy angels when He will bring His kingdom to fulfillment and exercise His role as Judge of all. This coming of Christ, at a time known only to God, demands constant expectancy and, as our blessed hope, motivates the believer to godly living, sacrificial service and energetic mission.

God's gospel requires a response that has eternal consequences.

10. We believe that God commands everyone everywhere to believe the gospel by turning to Him in repentance and receiving the Lord Jesus Christ. We believe that God will raise the dead bodily and judge the world, assigning the unbeliever to condemnation and eternal conscious punishment and the believer to eternal blessedness and joy with the Lord in the new heaven and the new earth, to the praise of His glorious grace. Amen.

I wholeheartedly agree with the EFCC Statement of Faith. I agree to teach and minister in accordance with this statement in my ministry within the Evangelical Free Church of Canada.

Signature: _____ Date: _____

Print Name: _____

Church or Organization: _____


Return to:

Evangelical Free Church of Canada
Box 850, Langley Station LCD 1
Langley, BC V3A 8S6

Fax: 604-513-2079

Email: kirby.thompson@twu.ca

This is Exhibit "C" referred to in the
affidavit of William Taylor sworn/
affirmed before me at Langley
in the Province of British Columbia, this
23rd day of July, 2014



A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE PROVINCE OF BRITISH COLUMBIA

Definition of Biblical Marriage

EFCC Statement on Marriage and Sexuality

Moral precepts and instruction are universally recognized as an intrinsic part of religious teaching and practice. The Evangelical Free Church of Canada affirms the historic, theological and Biblical understanding of marriage and sexuality. These theological precepts and moral directions are derived from the Holy Scriptures of the Old and New Testaments, as well as the Trinitarian theology in which we find meaning and community.

Biblical passages that ground our historic theological understanding of marriage, sexuality and related conduct:

On the purpose and origin of marriage:

"So God created man in his own image, in the image of God he created him; male and female he created them. God blessed them and said to them, 'Be fruitful and increase in number; fill the earth and subdue it.'" Genesis 1:27-28a

"The man said, 'This is now bone of my bones and flesh of my flesh; she shall be called 'woman', for she was taken out of man.'" For this reason, a man will leave his father and mother and be united to his wife, and they will become one flesh. The man and his wife were both naked, and they felt no shame." Genesis 2: 23-25

In the Genesis story, Adam and Eve are formed together as God's "image bearers", a unique role within the created order. The Bible indicates that God's image is not adequately reflected by only one sex: both together are necessary for a full reflection of the divine character. Furthermore, it is clear from the Genesis account that man and woman are intended to be united as husband and wife, "one flesh", and to create and nurture children. In Christian theology, the marriage union between a man and woman also reflects the plurality and unity within the Trinity.

Marriage in historic Christian faith is a symbolic expression of God's nature, where two complementary but different image bearers (man and woman), become one, exploring and revealing the mystery of God's own Trinitarian plurality and unity as they mature together.

On the permanence of marriage:

In the Gospels, Jesus said: "Haven't you read," he replied, "that at the beginning the Creator 'made them male and female', and said 'For this reason a man will leave his father and mother and be united to his wife, and the two will become one flesh'? So they are no longer two, but one. Therefore what God has joined together, let man not separate." Matthew 19:4-6

The description of marriage as a sacred union of a man and a woman, taught in the first chapters of Genesis, is affirmed by Jesus as a life-long commitment.

Marriage in the Holy Scriptures involves significant theological & moral principles:

The New Testament uses Marriage as an essential metaphor for understanding the relationship between Christ and the Church. For example, the Apostle John describes the relationship of Christ to his church to that of a groom to a bride (Revelation 19:7).

In the Letter to the Ephesians, the Apostle Paul uses Christ's love for the Church as a model for Christian marriage:

"Husbands, love your wives, just as Christ loved the church and gave himself up for her to make her holy, cleansing her by the washing with water through the word, and to present her to himself as a radiant church, without stain or wrinkle or any other blemish, but holy and blameless. In this same way,

husbands ought to love their wives as their own bodies. He who loves his wife loves himself. After all, no one ever hated his own body, but he feeds and cares for it, just as Christ does the church—for we are members of his body. “For this reason a man will leave his father and mother and be united to his wife, and the two will become one flesh.” This is a profound mystery—but I am talking about Christ and the church. However, each one of you must love his wife as he loves himself, and the wife must respect her husband.” Ephesians 6:25-33

On the sacredness of sex for Christians and its place in marriage:

“The body is not meant for sexual immorality, but for the Lord, and the Lord for the body...Flee from sexual immorality. All other sins a man commits are outside his body, but he who sins sexually sins against his own body. Do you not know that your body is a temple of the Holy Spirit, who is in you, whom you have received from God? You are not your own; you were bought at a price. Therefore honor God with your body. I Corinthians 6:18-20.

“But since there is so much immorality, each man should have his own wife, and each woman her own husband. The husband should fulfill his marital duty to his wife and likewise the wife to her husband. The wife’s body does not belong to her alone but also to her husband. In the same way, the husband’s body does not belong to him alone, but also to his wife. Do not deprive each other except by mutual consent and for a time, so that you may devote yourselves to prayer.” I Corinthians 7:2-5a

Sexuality is a healthy and natural part of human experience, but its rightful expression, according to the Bible, is between a man and a woman, who have entered into a marriage covenant before God. In our faith tradition, sexual expression outside of this model of marriage is viewed as contrary to God’s will and a violation of the community of believers.

Summary: According to These and Other Sacred Scriptures, We Affirm That:

- In Christian teaching, marriage is a divinely sanctioned institution carrying significant theological implications, and which is foundational to God’s plan for humanity and to the life of the Church.
- In the Holy Scriptures, God clearly intends marriage to occur between a man and a woman, and sexual relations are to be reserved for marriage.
- The Bible indicates that marriage is intended to be life-long union, and divorce is permitted only as a last resort, and for limited reasons.
- Monogamy is the New Testament norm, and polygamy is specifically condemned (I Timothy 3:2).
- According to both the Old and New Testaments, sexuality and fidelity are critical aspects of healthy bonding (“oneness”) in marriage. Infidelity is therefore a serious breach of trust, spiritually, relationally and in the community of faith.
- Teachings about marriage and sexuality in the Bible are important aspects of our spirituality and religious faith. Far from being arbitrary lists of prohibitions, Biblical precepts and moral directions about sexual conduct and marriage are interconnected to foundational theological doctrines for our community.

This is Exhibit "D" referred to in the
affidavit of William Taylor sworn/
affirmed before me at Langley
in the Province of British Columbia, this
25th day of July, 2014



A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE PROVINCE OF BRITISH COLUMBIA

COVENANT OF PERSONAL AND PROFESSIONAL ETHICS FOR THOSE SERVING THE LORD THROUGH THE MINISTRIES OF THE EVANGELICAL FREE CHURCH OF CANADA

I believe that I have been called and equipped by Jesus Christ to serve Him and His Church, and am presently serving the Lord through the ministries of the Evangelical Free Church of Canada. According to Scripture, those in leadership within the Church must live a life that is above reproach and meet the qualifications for such an office as outlined in the Word of God. I am committed to living my life under the Lordship of Christ, recognizing my responsibility to set an example of a lifestyle that is consistent with Scripture and sensitive to cultural dynamics.

I believe that God calls all believers to be people of integrity, that He enables us to live for Him by the power of the indwelling Holy Spirit, and that He extends grace in our weaknesses. Therefore, by God's grace and in complete dependence upon Him, I enter into this Covenant of Personal and Professional Ethics as a guideline for my life as I serve Him. I enter into this covenant with my Lord and Saviour, Jesus Christ, with the fellowship of the Ministerial Association of the EFCC and with those whom I serve.

1. Personal and Spiritual Life

I understand that God has called me to a life of righteousness, godliness and growth in Christ-like character. In order to be what He wants me to be I accept the responsibility of exercising the spiritual disciplines necessary for growth, yielding every area of my life to the control of the Holy Spirit. As I bring my mind under His control, I will choose to fill it only with things that are true, noble, right, pure, lovely and admirable. I will deal with sin by honest confession to God and those who have been affected by it. Fellowship with others is essential to growth, so I will avail myself of opportunities to be encouraged, instructed and built up by others in the things of the Lord. As a whole person, I will seek to keep physically, emotionally and mentally fit and will refrain from the abuse of alcohol, drugs or any other habit that would harm my ability to do all I do for the glory of God.

2. Family Life

I understand that my first responsibility before God is to love and care for the family He has entrusted to my care. I will be faithful to my spouse, guarding our relationship, investing in it and working humbly together to keep it healthy, growing and honouring to the Lord. The responsibility to love my children practically and to bring them up in the training and instruction of the Lord is a great privilege and among my highest callings. As I plan and maintain my schedule, I will seek to keep my family as an important priority, and model for them by my attitudes, words and actions, a healthy and positive view of the Church.

3. Finances

I believe that God is the provider and owner of all things and calls me to handle what He has put in my hands faithfully as a steward. As He provides, I will be content as I live within my means. Although unforeseen circumstances may arise, I understand that my goal must be to so order my affairs that others can rely on me to meet my financial obligations and demonstrate obedience to Biblical principles of Christian stewardship. I will demonstrate wisdom and discretion in handling financial matters with integrity and will avoid any financial or business arrangements that would deter me from being effective in fulfilling my calling to ministry.

4. Sexual Life

God calls his people to live lives of sexual purity and commitment in which sexual intimacy is practiced only within the context of a marriage between a man and a woman. Out of respect for the obligation to live a life of sexual integrity as a model for my children, my spouse and my church, I will refrain from any pre-marital and extra-marital relationships as well as homosexual activities. Recognizing the danger of impure thoughts, I will avoid any sexually-oriented, pornographic or any other material that could tempt me to further sin. I choose to treat others with respect and will not be involved in sexual abuse, harassment or assault of any kind, and accept my deep obligation to avoid acting in such a way that might tempt others to sexual sin.

Initial _____

5. Professional Life

I am called to be a servant of the Lord and His Church and count this to be a great honour and profound expression of His grace. In reliance on His help, I pledge to uphold this trust and never bring shame to His Name. I will be diligent in my duties, remembering that I am a steward who will give account to my Master. I will be Biblical in my preaching, presenting faithfully the whole counsel of God, speaking the truth in forthrightness and with love. I am determined that I will never abuse my position for personal benefit or pleasure.

I will always seek to be known as one who promotes peace and unity in the Church and will resist any effort of activities to divide it. I will not knowingly build the ministry in which I am involved to the detriment of other ministries. I will avoid speaking disparagingly of others in ministry. I have a special obligation to exercise sensitivity and care in relation to those who precede or succeed me in ministry. I will exercise sensitivity when I may be present in a place I have left and where another is serving. It shall, in these situations be my intention to strengthen the ministry of others, and work for the well-being and unity of the church. Similarly, in pursuing a call to a new ministry or considering termination of a present ministry, I shall understand the need for wisdom, discretion and honesty.

My calling obligates me to discretion and wisdom in relationships with others. I will avoid situations where being alone with a person of the opposite sex could in any way be misconstrued by anyone involved, directly or indirectly. If necessary I shall willingly limit my freedom where its use could hinder the reputation of my ministry.

Knowing that my effectiveness in ministry will often hinge on whether others can trust me fully, I will always seek to maintain confidentiality, except where my silence might endanger others.

I will respect my relationship to the Evangelical Free Church of Canada and will seek to support it through prayer, participation and promotion, always working in harmony with its doctrines, aims and objectives.

CONCLUSION AND ACCEPTANCE:

(Choose A or B below)

A. Acceptance without Reservation

It is my desire to live according to this Covenant of Personal and Professional Ethics, and I willingly and voluntarily agree that it shall be a condition of my credentialing with the Evangelical Free Church of Canada. I want those whom I serve in ministry to be aware of this Covenant. Because I am seeking with God's help to live a life befitting a servant of Jesus Christ, I desire that the Ministerial Standing Committee, graciously encourage me by exhortation and if necessary, loving discipline with a heart to restore.

signature

date

B. Acceptance with Reservation

It is my desire to live according to this Covenant of Personal and Professional Ethics, and I willingly and voluntarily agree that it shall be a condition of my credentialing with the Evangelical Free Church of Canada, with the following reservation(s):

I want those whom I serve in ministry to be aware of this Covenant. Because I am seeking with God's help to live a life befitting a servant of Jesus Christ, I desire that the Ministerial Standing Committee graciously encourage me by exhortation and if necessary, loving discipline with a heart to restore.

signature

date

This is Exhibit "E" referred to in the
affidavit of William Taylor sworn/
affirmed before me at Las Vegas
in the Province of British Columbia, this
23rd day of July, 2014



A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE PROVINCE OF BRITISH COLUMBIA

Trinity Western University as an “Arm of the Church”

Understanding a Critical Core Value

A particularly critical element in the TWU mission statement is the phrase "as an arm of the church." This phrase sometimes has been overlooked, leading to an incomplete understanding of the nature of the University. And sometimes this phrase has been questioned – viewed as peripheral to the University's mission rather than core as its position in the mission statement indicates – on the ground that such an explicit tie to the church may compromise TWU's identity as a Christian university. However, functioning as an arm of the church is inseparable from Trinity Western's core mission, essential character, and fundamental obligations.

Christian institutions of higher education are sometimes called "church-related." Church-related is often understood to imply that, although the church and the institution may be tied to one another more or less closely and especially in terms of financial support and good will in student recruitment, they nonetheless have fundamentally different purposes. In recent years church-related institutions have come under heavy pressure from the intensively humanistic educational philosophies of the secular culture. An all too common outcome has been that these secular values have invaded the culture of church-related institutions to the extent that linking the mission of the university closely to the mission of the church has been judged a hazard to the integrity of the university as an institution of higher education. Consequently, the faith-affirming character of many institutions has diminished over time, in some cases disappearing entirely.

Trinity Western University stands forthrightly against these trends and identifies its status as “an arm of the church” without apology. It is impossible to fully understand what Trinity Western is apart from reflection on the fact that it is “an arm of the church.”

TWU'S MISSION STATEMENT AND THE MANDATES OF THE CHURCH

Trinity Junior College, which matured into Trinity Western University, was founded by people who had a deep personal identification with the mission of the church. This sense of personal commitment to the mission of the church drew them together around the vision of creating an institution of higher education that would further the mission of the church. They understood clearly the distinction between the church and church-related organizations, but their goal was that the new institution would be, first and foremost, a community of people passionately committed to Jesus Christ and to God's purposes, striving to work out the implications of these commitments within the sphere of higher education. Therefore, they laid a foundation that would ensure the new venture would develop as a specialized, but nonetheless vital and effective, expression of the mission of the church. In the early 1980s the essence of this vision was expressed in a mission statement for Trinity Western College and eventually for Trinity Western University.

TRINITY WESTERN UNIVERSITY AS AN "ARM OF THE CHURCH"

Understanding a Critical Core Value

Page 3

Despite several smaller revisions over the years, the phrase "as an arm of the church" has remained unchanged in its prominent position.

The mission of Trinity Western University, as an arm of the church, is to develop godly Christian leaders: positive, goal-oriented university graduates with thoroughly Christian minds; growing disciples of Jesus Christ who glorify God through fulfilling the Great Commission, serving God and people in the various marketplaces of life.

There are many echoes of biblical themes in the TWU mission statement, but three stand out for their connection to the fundamental mandates of God's people.

- **"The various marketplaces of life"**

Our Christian responsibilities extend to every area of life. A broad theological concept associated with this view is the "creation mandate" drawn from Genesis 1 and 2 where God gives His human family the directive to rule over the earth, to develop its potential, and to care for it in accountability to the Creator.

- **"Serving God and people"**

Jesus came as a servant, and His people are to be servants, too. This obligation can be linked to the great "Love Commandments" of Jesus to "love one another" and "love your neighbor as yourself." Love is commanded for its own sake and is to be our goal apart from whether or not it moves others to consider the Christian faith as their own.

- **"Fulfilling the Great Commission"**

Servants of Christ also have a responsibility to function as ambassadors of Christ's salvation. Trinity Western's mission would be incomplete if it did not extend to the task of proclaiming the message of reconciliation between God and man. Within a fallen world, God is calling forth a renewed human family to serve Him and to live with Him forever. Within the mission statement, the comprehensive term used for this goal is "disciple-making."

It is important to observe that the mission statement ties all three of these activities back to the overarching objective of "glorifying God." God is glorified as we strive toward all of these goals together, seeking to manifest all in our manner of life.

DEVELOPING "LEADERS/SAINTS"

Leadership is another key theme in the University's mission statement and it, too, relates directly to these activities. As these biblical purposes are increasingly manifested in our lives, we progress toward "godliness," and those who strive to fulfill these purposes and to

TRINITY WESTERN UNIVERSITY AS AN "ARM OF THE CHURCH"**Understanding a Critical Core Value****Page 4**

instruct and encourage others in them are acting as leaders. In the New Testament believers are often referred to as "saints." One could say that our vision is to develop "leaders/saints"—mature, disciplined, intelligent disciples of Jesus Christ with skills of leadership who will penetrate every walk of life throughout our Canadian culture and, indeed, around the world. This task is intrinsically worthwhile as an expression of Christian love and service. Because God is good, we also are to be good and to do good. However, we are also to ensure that our goodness is never divorced from an awareness of our obligations as ambassadors of salvation. Our full-orbed goal is that our graduates, even as they model excellence of service in their chosen professions, would also inspire others—heart, mind, and soul—to become servants of Christ as well.

A number of fundamental commitments arise from this perspective. These include our commitment to deep integration of a biblical worldview into every area of study; our insistence that student development is an integral part of, rather than an adjunct to, the disciple-making process; and our commitment to standards of lifestyle that embody and reflect our identity as a community of God's people. All of these principles flow from and depend upon the recognition that the mission of Trinity Western is to be an expression of the mission of the church. Rather than "church-related," one might call Trinity Western "church-expressive."

This perspective is derived, more fundamentally, from our theological heritage and ethos. The great mandates noted above have no adequate foundation apart from God's church. All are intrinsic to the mission of the church and should not be separated from it. Although the creation and love mandates can be conceived of apart from the church—and even applied to a degree—if isolated from their context as the obligations of God's people they lose their appropriate grounding and much of their significance.

Moreover, the concept of Christian leadership has no meaning apart from the church. This is true if for no other reason than that functioning as a vital follower of Jesus Christ is not possible, long-term, apart from relationship to the church. To be sure, local churches and denominations sometimes, perhaps often, fall short of our ideals for them, but the universal church, the worldwide body of believers extending backward and forward in time through all ages, is essential to Christian faith and life. It is, therefore, essential also to Christian leadership.

THE UNITY OF BELIEF AND WORK

These principles enable us to answer an often-misunderstood question: "Does Trinity Western University train leaders for the society or for the church?" The answer sometimes mistakenly supplied is that universities train leaders for the society whereas seminaries train leaders for the church. However, the very form of the question is incorrect because it suggests that there could be a distinction – or perhaps even a

TRINITY WESTERN UNIVERSITY AS AN "ARM OF THE CHURCH"

Understanding a Critical Core Value

Page 5

compartmentalization – between the two. It is more accurate to say that Trinity Western seeks to prepare godly servant leaders, men and women who number themselves among God's people and seek to represent Jesus Christ wherever they go and whatever they do. Some of these leaders will serve in professions typically considered "secular" and some in professions considered "religious" but, in truth, this distinction should not be drawn so sharply, if at all. A sound theology of work includes the concept that all believers are called to be ambassadors of Jesus Christ within a dying world, wherever they go and whatever they do. As it has been said in other words, "Nothing is secular where Jesus Christ is Lord."

Thus, the inclusion of ACTS within the scope of the University is eminently appropriate, and could even be said to be a return to the historical pattern in which the great centres of Christian learning always included faculties of theology, for it was understood that theological understanding is essential to comprehension of Christian truth, on the one hand, and, on the other hand, that leaders of the church ought to be liberally educated individuals. Therefore, just as Trinity Western develops Christian leaders who will serve the mission of the church through careers that penetrate the larger culture, it is also appropriate for Trinity Western to develop those who will give leadership to the church itself. These are not two incompatible objectives, to be carried out by different types of organizations but, rather, aspects of the single task, single mission, single vision, and single ministry of Trinity Western University as a centre of Christian higher learning.

Ultimately, our goal is that TWU graduates would become the arms and legs of God's church as it strives to penetrate "the various marketplaces of life" with the influence and message of the gospel. So far as it is possible, we strive to develop every graduate into a leader who will make a personal contribution to furthering this broader understanding of the mission of the church.

Rob Stare is a TWU graduate who understands that his bicycle store is also his place of ministry, that his business life and his service as a Christian believer are to be seamless. Frequently, Rob's church will pray for the "ministry of the bike shop." How much healthier this perspective is than the compartmentalized views we sometimes hear of, in which a professional or business person makes a distinction between what is done on Sunday and what is done during the rest of the week, or the equally unhealthy notion that what the pastor does is spiritual and what the other members of the congregation do is not. We urgently need to learn to speak of and pray for the ministry of the businessperson, the ministry of the insurance broker, the ministry of the doctor, the ministry of the tradesperson just as easily as we refer to the ministry of the pastor or the missionary. Every one of God's people is called to serve as a person who ministers in the name of Christ in whatever vocation he or she may pursue.

TRINITY WESTERN UNIVERSITY AS AN "ARM OF THE CHURCH"

Understanding a Critical Core Value

Page 6

God intends for there to be a fruitful synergy between faith and work, work and worship. As the church is strong, the Christian leaders within it who are to serve as its agents in every walk of life can grow spiritually mature. Then, as those Christian leaders are nurtured, the ministry of the church can be multiplied in effectiveness as these men and women infiltrate and penetrate the culture with God's message to a degree that would never be possible if the message were confined within the walls of the church building and limited to Sundays.

OUR BELIEVERS' CHURCH VISION

The overarching principle that TWU is an arm of the church requires further definition; there are many church traditions. However, Trinity Western has a primary identification with the Believers' Church movement, a vision of faith that shapes our outlook and our practices. Trinity Western's theological heritage, faith commitments, and sustaining perspective are drawn from the Believers' Church movement, which seeks to embody the following commitments:

- Insistence on the necessity of personal repentance and regeneration for salvation through God's grace, leading to a strong emphasis on personal evangelism, mission outreach, humble service to others, and a call for the Lordship of Christ over all aspects of life. Trinity Western's fundamental understanding of its task is to serve Christ through furthering His mission of calling men and women to salvation and redeemed living worked out in recognition that they are to evidence as fully as possible now a manner of life appropriate to the heavenly kingdom.
- Commitment to witness. The primary task of believers today is to witness to the world. Faithfulness in the task of witness requires that service, love, and proclamation should always be linked. Trinity Western's programs should stimulate all members of its community to live as "salt and light" within the larger culture, bringing to bear a biblical perspective on all areas of life. Authentic New Testament Christianity is the "narrow way." Unpopularity, and even persecution for Christ's sake, are often a consequence of faithfulness to God, and Christians are called to persevere under such conditions, evidencing their faith in God through deeds of witness, self-sacrifice, compassion, righteousness, and justice.
- Devotion to the aim that all teaching, learning, thinking, and scholarship should take place under the direction of Scripture, which is regarded as wholly authoritative and truthful in all its teachings and within the bounds of the University's Christian faith commitments. The light of Scripture shines in and exercises a controlling perspective over all true learning. Through scholarship, teaching, and learning at Trinity Western,

all members of the community should hear the call of God to serve the Lord Jesus Christ, guarding against idolatry, unethical practices, and harmful research.

- Emphasis on biblical piety and holiness. Secular culture and the persons within it are fundamentally marred by sin. University life should be governed by the principle that Christians must not conform to the pattern of this world, but must be transformed through the renewal of their minds to test and approve what God's will is (Romans 12: 2-3). Trinity Western community members are to take seriously the doctrines of separation and kingdom citizenship which mandate that, although believers are to be involved in the world, they are to set themselves apart from its sinful patterns of thought and behaviours through spiritual renewal, adopting instead a primary personal identification with the kingdom of Heaven.
- Vigorous effort to live as a university community of redeemed individuals, including commitment to and personal involvement in regular prayer, corporate worship, and Bible study along with other practices that cultivate maturity in the Lord. Within the Trinity Western community, as elsewhere, these practices provide an essential context for maintaining a positive Christian community, and they should be regarded as essential components not only of personal development but also of the processes of intellectual development, faithful teaching, and Christian scholarship.

A UNIVERSITY THAT SERVES ALL DENOMINATIONS BUT IS ROOTED IN ONE

Trinity Western University is blessed with a marvelously diverse community of people from a breadth of church backgrounds and denominations who, nonetheless, share the common vision of ministry and service defined here. This diversity is most appropriate because Trinity Western strives to serve the body of Christ broadly, not limiting its vision of service to one or even a few narrow groups but striving to encompass all who identify with the fundamental purposes of the University. Trinity Western strives to be broadly evangelical in its vision for service and includes representatives of other denominations on its governing board and councils.

However, although interdenominational in service and, in part, in governance, Trinity Western University maintains specific denominational associations with the Evangelical Free Churches of Canada and the United States. It was founded and continues under their authority, with the goal that it should exist as an expression of the heritage and values of those church fellowships. Happily, a core value of those fellowships is to be "broadly inclusive" of the larger evangelical community, but this aspiration toward inclusion occurs within the context of a clear sense of their own religious identity and doctrine. There are two particularly important reasons why the denominational character of TWU is important:

- First, the denominational anchor protects the institution from internal drift. It must be understood that, although inclusive in its vision for service to the larger evangelical community and even to the larger culture, the core values, the vision, and the mission of the University are not determined by the current "pan-evangelical consensus" nor even less by the preferences of a hostile humanistic society, but by the central ethos of the sponsoring denominations. Others who are willing to identify with this ethos are welcome to participate, but the fundamental character of the institution is firmly anchored to its more specific denominational heritage. A review of history shows that Christian institutions are always at risk of losing their founding vision through gradual erosion. The clear denominational ties constitute a vital theological anchor for the University that help ensure its future faithfulness, integrity, and mission focus.
- Second, the University's denominational anchor protects the institution from external pressures. The clear and unambiguous status of TWU as a denominational institution may prove to be one of the most important guarantees of its continuing religious liberty within the context of a rapidly secularizing and increasingly hostile culture. By virtue of our denominational tie we are able to argue that preservation of our doctrine and standards is inextricably inter-linked with the protection of religious liberty for a specific church community. Indeed, this very argument was a critical point in our legal confrontation with the British Columbia College of Teachers. Whereas in previous years there may have been some merit in the idea of becoming broadly interdenominational, this move would likely constitute a significant weakening of the University's position within the present social context.

HOLDING FAST TO THE CORE

It can be seen, therefore, that the words "as an arm of the church" in our mission statement express vital core concepts that are essential to the identity and operation of Trinity Western. They anchor Trinity Western firmly to its role and intention not only to support the church in its mission but also to serve the church through making a vital, uniquely effective contribution to fulfillment of the mission of the church.

Pressures for the University to be and to become something other than it presently is are inevitable. There may be suggestions that this view of the University's mission is too narrow, that it will lead to misunderstanding of our character as an academic institution, or that it may become an impediment to effective marketing. These pressures will always be with us, greater at one time than another, but we choose not to be driven by them, believing instead that the benefits of remaining as an arm of the church will outweigh substantially any disadvantages there might be.



This is the 1st Affidavit
of Brayden Volkenant in this case
and was made on July 30, 2014

No. S-142908
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TREVOR LOKE

PETITIONER

AND:

MINISTER OF ADVANCED EDUCATION OF BRITISH COLUMBIA and
TRINITY WESTERN UNIVERSITY

RESPONDENTS

AFFIDAVIT

I, Brayden Volkenant, Business Coordinator, of Surrey, British Columbia, MAKE OATH AND SAY
AS FOLLOWS:

1. I am employed as the coordinator of business and strategic affairs with the respondent, Trinity Western University ("TWU"). I am also an *alumnus* of TWU and as such have personal knowledge of the facts and matters hereinafter deposed to, except where they are stated to be made on information and belief, and where so stated I believe them to be true.

Family & Religious Background

2. I am an evangelical Christian.
3. I was born and raised in an evangelical Christian home. My mom, my dad, and all four of my grandparents were born and raised in the Christian faith.

4. I accepted Jesus Christ as my personal saviour at a young age and cannot recall a time in my life before I became a Christian.
5. For as long as I can remember, my parents have been actively involved in the Christian church. I grew up going to Bethany Baptist Church in Richmond every Sunday. For the past ten years, I have been attending Hope Community Church in Surrey and am very involved in my church community. I coordinate the church's young adults program, help plan weekly religious services and manage the church's soccer team. Several years ago, my wife and I started a Bible study and continue to host this Bible study on a weekly basis. Recently, I was appointed as one of the elders on our church's Board of Directors.
6. My identity is entirely defined by my relationship with Jesus Christ. My Christian faith is the foundation for my life and I try my best to ensure it shapes and informs every decision I make. Everything I do, I try to do in light of my faith and my Christian identity.

My experience at TWU

7. In 2007, I was recruited to play soccer for the TWU Spartans. I played for five seasons at TWU earning various team and personal awards. I was fortunate to be named captain of the team at the start of my 3rd season and continued in that position for the remainder of the time that I was a student at TWU.
8. I began attending classes at TWU in the Fall of 2007. I graduated in the Fall of 2012 with a Bachelor of Arts, majoring in Business Administration. My cumulative G.P.A. when I graduated was 3.77 and I received the academic honour from TWU of graduating with "Great Distinction".
9. In my experience, the quality of education at TWU was excellent. At TWU, I felt that I belonged to an academic community that challenged me to think more critically and deeply than I ever had before. My professors challenged me to open my mind and see my entire life, including my religious beliefs, from a new and more mature perspective.

10. For example, I recall that in one particular class, “The Life and Teachings of Jesus”, my professor asked students to critically assess the evidence concerning Jesus’ life and come to their own conclusion about the accuracy of Christian doctrine on this issue. The dialogue in the class was incredibly diverse, with some students expressing that they were unsure of the veracity of the facts in the Biblical narrative. I appreciated that the professor moderated the discussion and asked questions without prescribing answers for students.
11. One of the things I enjoyed most at TWU was the small class sizes and high-touch learning environment at the university. In my experience, this academic environment fostered the development of close personal relationships between professors and students, as well as amongst the members of the student body. I found that the close-knit community at TWU positively affected the way students interacted with each other in the classroom and on campus generally. My observations were that students were generally friendly and respectful towards one another. Students were encouraged by TWU to get to know one another and to actively participate in the student community. This made TWU a welcoming, safe, and inclusive place to be a student.
12. In addition to the academic environment and my experience on the soccer team, the thing that I most appreciated about going to TWU was the growth that I saw in my Christian faith over the period that I studied there.
13. Over the duration of my time as a student at TWU, I was challenged to delve deeper into my spiritual life than I ever had before. Looking back, I am grateful that TWU not only had a great soccer team, but also taught its courses from an explicitly Christian perspective. This approach to learning gave me an appreciation for the importance of integrating my Christian faith into all areas of my life.
14. I continue to have many close relationships with my former professors and my former soccer coaches. I consider them to be some of the greatest spiritual mentors I have had in my life. I believe that the opportunity I had at TWU to develop close relationships of spiritual mentorship with my professors, and spiritual kinship with my fellow students, was enhanced because of the fact that TWU maintained itself as a Christian campus, committed to the realization of a Christian ideal.

15. When I went to TWU I was asked to abide by certain community standards in respect to my conduct and behaviour while a student at the university. As an evangelical Christian, I already believed much of what was expressed by these standards.
16. I never felt that in agreeing to TWU's community standards that I was bound by a standard of perfection. As a Christian, I believe that every person is sinful and that no one can be perfect. I understood this to be the belief underlying the community standards as well. I never felt as though TWU put pressure on students to perfectly maintain them.
17. Critical and supportive views of the community standards were freely expressed by students. In particular, the requirement TWU previously maintained that prohibited the consumption of alcohol by TWU students on and off campus was a frequent topic of discussion. The thrust of many discussions I had about this issue centered on the concept that it was not the rule itself that was at the heart of the prohibition, but rather the values of self-control and discipline that the standard encouraged.
18. To me, the community standards provided a benchmark by which I and other Christian members of TWU's community could hold each other accountable to our joint pursuit of growth in the Christian faith. In my experience, fellow students at TWU did a good job of encouraging each other to live in accordance with the community standards without being self-righteous or judgmental towards other people. In this way, it was my experience that my religious commitment was enriched and respected by belonging to such a community.
19. I believe the presence of these standards contributed to the creation of a safe and respectful environment for all students, not just Christian students, and that having all of the community members agree to these same standards fostered a campus environment conducive to faithfully living out Christian morality.
20. I found there was a general awareness amongst the student population that bullying other students or treating them disrespectfully was not acceptable behaviour in the TWU community.


21. Although many people I knew at TWU shared my religious beliefs, I also met people from different walks of life, with different viewpoints. In my experience, the fact that TWU was a Christian university did not prevent the development and flourishing of a diverse student body with respect to various worldviews and backgrounds. One of my friends in my first year at TWU was a Muslim. I was well aware of his religious beliefs and he discussed this openly with me.

Desire to Attend a Christian Law School

22. I have always wanted to attend law school, and took elective courses while completing my undergraduate degree at TWU that I thought would improve my GPA and increase my chances for admittance.
23. My dad is a lawyer, so the law has always been in the back of my mind as a career option. It was in my third year at TWU that it became fully apparent to me that I wanted to be a lawyer. I took a Business Law course and I loved it. I have always loved analysis and engaging in debate, but it was in this class that I realized my passion for developing an argument and finding the evidence to support my perspective.
24. I have heard from other Christian friends that have attended other law schools that the Christian faith is not always respected there, and is certainly not explicitly integrated into the teaching of how to understand and practice law.
25. I am familiar with TWU's proposal to open a School of Law and understand that it intends to offer a specialization in the area of charity law. I have a heart for Christian charities and those who are less fortunate than me and believe this would be the demographic that I most want to serve with my law degree. I would also like to be able to stay in the Lower Mainland and attend a law school where I would not have to choose between receiving a Christian education and becoming a lawyer. I am not aware of any other option in Canada where I could attend a law school that teaches from a Christian perspective. I believe I would benefit as a Christian from studying law in an environment that challenged me to reconcile my personal faith and beliefs with the law, and respected that living a life of deep Christian faith can impact and enhance my practice.

26. TWU's School of Law would be my top choice of a Canadian law school.

SWORN BEFORE ME at the City of Langley)
 in the Province of British Columbia, this 30)
 day of July 2014.)


 _____)
 A Commissioner for taking Affidavits within)
 British Columbia)



 BRAYDEN VOLKENANT

Andrew D. Delmonico
 Barrister & Solicitor
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This is the 1st Affidavit
of Arend Strikwerda in this case
and was made on July 24, 2014

No. S-142908
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TREVOR LOKE

PETITIONER

AND:

MINISTER OF ADVANCED EDUCATION OF BRITISH COLUMBIA and
TRINITY WESTERN UNIVERSITY

RESPONDENTS

AFFIDAVIT

I, Arend Strikwerda, Medical Student, of London, Ontario, MAKE OATH AND SAY AS
FOLLOWS:

Background

1. I am a medical student at Western University and alumnus of Trinity Western University ("TWU") and as such have personal knowledge of matters hereinafter deposed to, except where they are stated to be made on information and belief, and where so stated I believe them to be true.
2. I am a Christian. I am also gay. Both aspects of my identity are very important to me.

3. I attended TWU from 2007-2011. I graduated from TWU with a Bachelor of Science Degree (honours) in cell and developmental biology, with a minor in Chemistry. I graduated with distinction and spoke at the baccalaureate service during our graduation ceremony. As a part of the honours component of my degree, I completed a thesis project studying cell signalling during the mitosis of retinoblastoma cells. I spent an additional three summers at TWU working as a research assistant for one of TWU's research labs (two of which were after I graduated from TWU) and contributing to a paper that was recently published in a peer reviewed journal.
4. I was involved in TWU's community. I was a part of the school's orchestra. I was a regular performer in a popular on-campus comedy show ('11:07'). I played intramural sports. I was a part of several clubs. I lived on TWU's Langley campus all 4 years and loved the campus community there. I worked in the library, the chemistry lab prep room, and was a first year biology TA in my senior year. I was active in the student ministries as a part of the transitions programs. In my last two years I was a part of the coordinating team that organized orientation weeks for new students and a first semester class for new students. I was fully a member of the TWU community, and I believe that my sexuality had no bearing on my involvement in it.
5. I attended TWU for a number of reasons. I knew I wanted to go into medicine. TWU offered a degree that is a prerequisite for medical school. I appreciated that TWU would be a Christian community that had a good science faculty. Many of my high school classmates were going to nearby colleges and universities in Ontario. I was excited at the prospect of having the opportunity to make new friends and redefine how others thought of me in a new environment across the country.

My Journey

6. I grew up in a Dutch-Canadian family in Ontario as a smalltown farm kid who attended a small high school. I attended a local Christian church with my family, where we were

very active members. I played violin in the church band. I was also a leader of the church junior youth group.

7. I attended a Christian elementary and high school in Ontario. I was a member of the theatre department and choir during high school. In my community I was active in sports and began working in part time jobs when I was 12 years old.
8. From a very young age, I knew that boys were supposed to like girls, get married, and have families. I had not considered anything else. I had crushes on girls and assumed I was like everyone else.
9. When I began puberty, I realized that my sexual attractions were not like everyone else's. I experienced shame and guilt about this. Being in a same sex relationship was unequivocally considered sinful in the religious communities I was brought up in. At the time, I felt that it was not reconcilable with my faith.
10. I prayed for God to change me. Even in my late teens, I assumed that one day I would marry the girl of my dreams and have a family with her. My immediate future held 4 years of university and that seemed like a long period of time within which I would grow into the mature, straight man I hoped to be. I knew I wasn't 'straight' at that moment, but I never thought of myself as gay.
11. Before arriving at TWU, no one knew about my same-sex sexual attractions.
12. While I was at TWU, I began to realize that being gay was not something I was going to grow out of. Many of my friends were entering long-term heterosexual relationships and getting married. This forced me to confront my childhood fantasies of white picket fences, three children, and a dog. I started to consider that a wife was no longer part of my dream. My reality was not changing as I had hoped.
13. During my time at TWU, I began to realize and accept that being gay was who I was.

14. Growing up, I was taught and believed that homosexual relationships are wrong and sinful. Everyone around me said it. I knew it like I knew many other religious teachings that I did not question, like the age of the earth, the existence of hell, etc.
15. TWU welcomed me, a sheltered smalltown conservative evangelical kid. It was an environment that allowed and challenged my religious assumptions and beliefs within a rigorous, but caring academic community. I learned to think critically.
16. However, within months of arriving at TWU, my presumed knowledge about the origins of the earth was shattered. During my time at TWU, I was forced to confront many religious and scientific assumptions I held. I spent a lot of time confronting and dissecting many components of my faith. I was forced to do so, as all sorts of aspects of my faith were challenged regularly inside and outside of class. In this way, I was constantly evaluating and re-evaluating everything that I believed during my time at TWU.
17. Attending TWU gave me the idea to even start looking at why I believed what I did about homosexuality in a Christian context. I do not think I would have been able to do so in my previous Christian communities, or at a secular university.
18. TWU gave me the tools to understand how Christians interpret the Bible, and how Christians form traditions. TWU gave me the self-assuredness to look for answers to religious and personal questions for my own life, and to believe that I was capable of figuring out what is true and what I believe. TWU was instrumental in developing a maturity to my faith. Among other things, attending TWU greatly assisted me in reconciling my sexuality with my faith.
19. Perhaps most significantly, TWU gave me, a deeply closeted conservative evangelical kid, the courage to confront my sexuality and begin the process of self-acceptance.

20. When I came to TWU, I had wanted to start fresh and be the person I wanted to be, not the person my environment expected me to be. Ironically, being gay was not really on my mind when I was thinking about being myself at TWU. But TWU was exactly what I expected in that I was able to be who I wanted to be while at TWU. And when I started to accept being gay as part of my identity, my friends from TWU immediately accepted that - there was never any question about it. When I was ready to come out, I came out. I did not feel any pressure to hide who I was.
21. When I came out as gay, seven of the first eight people I told were my friends from TWU. Each time I did so, I opened up a deep and valued conversation between myself and that friend.
22. All of these friendship still continue today, even though some (but not all) believe the Bible frowns upon homosexual relationships. In fact, I have had many incredibly meaningful conversations with them about sexuality and faith as a result. All of these friends have reiterated their love for me, accepted me, and have been very important to me as I figured out what I believed. I've never felt like less of a person around any friends or acquaintances from TWU.
23. I told one professor at TWU that I am gay. The professor was very accepting and kind to me after being told. This professor wanted to hear my experience, rather than tell me their beliefs on the subject.
24. I greatly value the many friendships that I have made with TWU students and faculty.

My Experience at TWU

25. I loved my time at TWU.

26. My favourite part about TWU was the diversity of opinion and challenging of orthodox views. I had many exciting and fascinating conversations with friends from all disciplines. To me, it felt like no topic was ever off limits.
27. For example, I was curious about how the early characters in the Bible had a sense of morality before the law was delivered by Moses to the nation of Israel. In one of my classes, I wrote an essay where I argued that sexual morality in those early days could be understood as an evolved instinct. Male members of communities sought power over the sexuality of their female counterparts. I thought it was unconventional and highly controversial: my professor loved it.
28. I turned this essay into an article that was published in TWU's student newspaper, Mars' Hill. As with many controversial topics, I heard that some people disagreed with me, but there were never any attempts to stifle debate or shut me down in any way.
29. I felt free at TWU to explore all sorts of intellectual problems from a critical point of view and from different perspectives. If I felt curious about a different point of view than the mainstream conventional point of view, I was never shouted down, censored, or discouraged from exploring it in class (or outside of class for that matter). Debate was honest and respectful. If someone disagreed with me, they would express it, and vice versa.
30. I felt completely free to express any opinion respecting any moral issue in TWU's Community Covenant, including any provision in TWU's Community Covenant itself. I availed myself of this opportunity and in my experience many other students did the same.
31. For example, in the first two years I attended TWU, students were prohibited from consuming alcohol on or off campus. There was much discussion on campus during these years about the reasoning behind this provision, whether or not students agreed with

it, and whether it had any continuing usefulness. I was not afraid to comment on this, or any other aspect of the Community Covenant.

32. In my experience, every other student at TWU I encountered freely spoke about the Community Covenant, even if they were critical of it. It was discussed freely in the student newspaper, the Mars' Hill. There was no sense to me that TWU's administration was upset when students critically evaluated the Community Covenant. In fact, the TWU administration communicated to the student body that they welcomed student input when they were in the process of reshaping in the Community Covenant during the time I attended (which TWU did midway through my degree).
33. I respected the Community Covenant during my time at TWU. Like many other students at TWU I strived to adhere to it, even though I did not always live up to its ideals.
34. I do not agree with TWU's position on homosexual marriage, but even though I would like to see this aspect of the Community Covenant change one day, I continue to appreciate that the Community Covenant defines the expectations of TWU's community and reflects the view of most of that religious community.
35. I never felt that the Community Covenant harmed me, as a gay person, at TWU by pushing me further into the closet (or keeping me there), making me the target of homophobic slurs or harassment, making me feel isolated, affecting my self-esteem, or excluding me from TWU's community. Nothing I saw or experienced would make me feel that other sexual minorities would be harmed by TWU in these ways. In fact, such things would be contrary to text and spirit of the Community Covenant itself.
36. In fact, I attribute my attending TWU to giving me the tools and self-esteem to come out of the closet as gay.

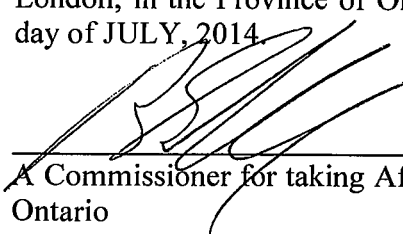
37. On the contrary, my experience is that TWU, through the Community Covenant and its unique community, is an inherently welcoming place for all types of students, including gay people like myself.

My Experience at Medical School

38. This fall, I will be entering my third year of Medical School as a student at the University of Western Ontario Faculty of Medicine ("Western").
39. It is difficult to compare my time at TWU with my time at Western so far. My experience is that TWU is unique from Western and other universities I had researched because TWU is invested in helping young adults mature through personal development (i.e., encouraging them to grow and flourish as a person), as opposed to merely focused on academics.
40. Canada is more accepting of gay people now than it was when I first attended TWU in 2007. Western is welcoming institutionally of gay people; for example, I know where I can go for support as a gay student.
41. However, Western is far from perfect. In conversations with various students at Western, I have sensed that being gay is thought of negatively by some students. I also picked up this from some students at TWU too. However, I never perceived any hatred, discrimination, or ill will toward gay or LGBT people from the TWU community.
42. At Western, I was once changing in a busy locker room at the Western gym. I heard a group of guys come in. One was loudly calling out to his friend. He repeatedly called him a 'fucking faggot'. Everyone in the room could hear these comments. No one said anything. I do not have any comparable experience from my time at TWU. Any such

derogatory slur would have been unacceptable at TWU and inconsistent with the Community Covenant.

SWORN BEFORE ME at the City of)
London, in the Province of Ontario, this 24th)
day of JULY, 2014.)



A Commissioner for taking Affidavits within)
Ontario)



AREND STRIKWERDA



This is the 1st Affidavit
of Austin Davies in this case
and was made on July 28, 2014

No. S-142908
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TREVOR LOKE

PETITIONER

AND:

MINISTER OF ADVANCED EDUCATION OF BRITISH COLUMBIA and
TRINITY WESTERN UNIVERSITY

RESPONDENTS

AFFIDAVIT

I, Austin Davies, Businessperson, of Vancouver, British Columbia, MAKE OATH AND SAY
AS FOLLOWS:

1. I am an *alumnus* of TWU and as such have personal knowledge of the facts and matters hereinafter deposed to, except where they are stated to be made on information and belief, and where so stated I believe them to be true.

Background

2. I am 31 years old.
3. I am an evangelical Christian and I am gay.
4. Although I am gay, I am married to a woman with whom I have six children.

5. My wife and I have had four children together. My wife already had one daughter from a previous relationship at the time that we were married, whom I have since adopted. We also have one foster child for whom we act as permanent guardians.
6. I grew up in a fairly sheltered environment. I was homeschooled throughout grades K-12. There was little discussion about sexuality in my home during this time. Even as I began to feel myself attracted sexually to other men when I was about twelve years old, I still didn't know what homosexuality was. However, I felt like something was wrong with me, so I kept my sexuality a secret for several years.
7. I finally confided my same-sex attractions to my church pastor when I was in my mid-teens. When I met with my pastor I told him that I wanted to have sex with other men and I didn't know what to do with my attractions. My pastor told me that he thought very highly of me for having the courage to share my experiences with him. I recall him telling me that I was young and that I should talk with my father about this issue. My pastor didn't say anything to me about changing my identity or trying to remain sexually pure or even about needing to deny the sexual feelings that I was having toward other men. The only thing that he said to me was that he cared about me and accepted me for who I was. Then he prayed with me. I appreciated his loving and thoughtful response.
8. For most of my adult life, I have continued to be sexually attracted to men, exclusively. However, for religious reasons related to my Christian faith, I have chosen not to engage in any homosexual conduct. As an evangelical Christian, I believe what the Bible teaches, in that it is morally wrong for any person, including me, to engage in homosexual conduct. I believe that this is not an arbitrary teaching, but is designed to maximize human flourishing in adults, children, families, and society as a whole. However, I also believe that it is morally wrong to mistreat or ostracize any person because they engage in activities that I believe are sinful.
9. I am comfortable with my gay orientation. To me, my gay orientation consists of being primarily sexually attracted to other men and having a deep and almost subconscious

need for sexual affection from them. I do not see it as being sinful or immoral to have a gay sexual orientation. However, I believe that I have the ability to make a distinction in my own life between being gay and choosing to act on my same-sex sexual desires.

10. I have chosen not to engage in homosexual conduct despite my gay orientation because I believe that my true identity is found in Jesus Christ. I do not primarily identify myself through my sexual identity or sexual practices. I have made a personal decision that it is more important to me to live in a manner that accords with my Christian value system than it is to pursue same-sex sexual activity. It doesn't matter to me whether I continue to have same-sex attractions my whole life. I have accepted who I am and have come to love myself as a Christian man who is also gay.
11. Now that I am married, I am able to enjoy a fulfilling and intimate monogamous relationship with my wife, who is also a Christian. She is aware of my sexual orientation and accepts me and supports me in my desire not to engage in homosexual behaviour.
12. I used to think that I could never be married because I was not attracted to women. My wife is still the only woman that I have ever been attracted to. I find that this makes me very happy and content and I love my wife very much.
13. Before I attended TWU, there was a time in my life where I was very depressed, anxious, fearful, and hopeless. I believe that these feelings related to my inability at the time to reconcile the way I was experiencing sexuality with my religious beliefs.
14. When I later embraced the idea of abstinence from homosexual conduct, a deep peace slowly enveloped my life. Through learning to live out my Christian faith in all aspects of my life, including my sexuality, I have found more hope, freedom and openness in my life than I could have thought possible.
15. I have actively tried to get to know people in the gay community. In my experience, when I talk to other gay people or people who do not share my religious beliefs and share

how I reconcile my gay sexual orientation with my Christian faith, they find this difficult to accept and understand. When I try to explain why I choose to abstain from homosexual sexual conduct in order to practice my Christian faith, I am often met with disbelief and disdain.

16. I believe this is because people who do not share my faith or my moral worldview, whether gay or straight, cannot understand why it is important for me to sacrifice my desire to engage in certain forms of sexual behaviour in order to remain consistent with my religious beliefs. I feel more comfortable explaining my homosexuality to Christian believers than I do trying to explain my religious beliefs to others who may share my sexuality, but do not respect or understand my religious moral convictions. In this way, I have found that it is very valuable to participate in Christian communities.

My experience at TWU

17. Shortly after graduating high school, I spent my first year of postsecondary education in general studies at Douglas College in New Westminster.
18. I found this year of study at Douglas College to be a valuable experience in some ways but it was also difficult. I felt constantly marginalized and ridiculed every time I tried to talk about my religious beliefs with other people on campus. As a result of this, I was especially attracted to TWU, where I hoped to find my Christian faith valued and encouraged.
19. In discussions with a variety of people, I have found there was a very clear message at Douglas College about what it meant to be gay. To me, this message was that to be gay necessarily meant that I must participate in sexual activity with other men. This understanding didn't comport with my own beliefs about how I could live out my sexual orientation in a manner that was also consistent with my religious beliefs.

20. I felt pressure to agree with what appeared to be the acceptable position of what it meant to come out of the closet and live life as a gay man, even though this paradigm did not reflect my religious beliefs. I found that I was not accepted by others at Douglas College, and, in fact, felt completely rejected and disdained, when I tried to offer my perspective on homosexuality.
21. Douglas College was a very isolating experience for me; I felt that I had to hide my religious beliefs.
22. I left Douglas College in 2002 and entered the Biology program at TWU. I attended TWU for the next four years and graduated in 2006 with a Bachelor of Science degree in Biology.
23. My entire experience at TWU was fantastic. I found that at TWU, my Christian faith was valued and encouraged. I also felt like I could be myself with other students and TWU staff. Attending TWU was a pivotal period of my life and my character development.
24. The Christian environment at TWU was like a breath of fresh air to me; TWU was both mentally and spiritually stimulating. There was a broad spectrum of Christian and non-Christian philosophies and opinions represented among students at TWU.
25. TWU's environment caused me to consider, challenge, and strengthen my own religious beliefs. I spent many hours in class and out of class debating and discussing philosophical and theological issues with professors and students. I also appreciated that there was a level of academic honesty that came with professors who were free to share the teaching material through their Christian worldview in the classroom. I could understand why they interpreted the teaching material in the way they did, and felt free to come to my own conclusions about it.
26. I loved the diversity of the students that I met at TWU. In particular, I enjoyed having classmates that came from all over the world. I was involved in TWU's International Student Programs ("ISP"), which involved me and other students putting on events for international students in order to welcome them to Canada and ease their transition into

our culture. In my role with ISP, I was under the leadership of Community Life staff, who were TWU employees.

27. I made friends with students from diverse Christian backgrounds as well as those from other religious and non-religious backgrounds. I found the experience greatly opened up my understanding and appreciation for all people. I enjoyed having small classes and professors who became friends and mentors. My experience was that my professors and friends actually cared about me, even if they didn't always agree with me.
28. I made several lasting friendships with students at TWU that were and remain very valuable to me. One of my TWU roommates became my best man at my wedding and after graduating I was roommates with another previous classmate. I am still in regular contact with dozens of other TWU students who are now living all over the world. There are several faculty members in various disciplines who made a great impact on me at TWU, and I continue to remain in occasional contact with them. Whenever I visit TWU's campus, I make a point of dropping in and having a chat with some of my professors. I continue to benefit from their willingness to give me counsel and care for me and what is happening in my life.
29. When I attended TWU, I agreed with the Community Standards (or Responsibilities of Membership) wholeheartedly. I found that discussions and debates on the Community Standards were frequent, even in small groups with Community Life staff. In my experience, students, including me, freely and openly expressed dissenting opinions on the Community Standards and did so without fear or self-censorship.
30. In my experience, the presence of the Community Standards ensured a safe learning environment for me that was free from many of the negative distractions that existed at Douglas College. There was certainly a small contingent of students who didn't honour the Community Standards they signed, but for the most part students respected and tried to follow the Standards.

31. As a Christian, I found it particularly helpful that TWU's Community Standards corresponded to my religious beliefs.
32. Specifically in relation to my sexual orientation, the Community Standards asked me not engage in sexual activity outside of marriage between a man and a woman, which was the very thing I was eager not to do because of my religious beliefs. I greatly appreciated living in a community where that was the standard that was expected of me and others.
33. Because the environment at TWU was supportive of Christian faith and morality, it encouraged me to live my Christian life in the way that I believe it should be practiced. Because there was a common standard for students not to engage in homosexual conduct, I was encouraged and emboldened to remain faithful to my religious convictions. This environment helped me to pursue my spiritual goals, including not engaging in homosexual conduct, because I was spending most of my time in an environment with other Christian believers who shared my beliefs.
34. I much preferred the campus environment at TWU to what I had experienced at Douglas College. I equate a large part of this to the fact that it was simply easier for me to freely practice my religious beliefs at TWU. Contrarily, at Douglas College, the environment was such that I found it very difficult to practice my belief in sexual abstinence outside of marriage. I was hit on by gay men at Douglas College, whereas this did not happen at TWU. I didn't have any issue with those people expressing their sexual interest in me, except that it made it more difficult for me to abstain from reciprocating their advances. I knew other men at TWU who were gay, but they shared my religious beliefs and thus my desire to abstain from sexual practices outside of a Christian definition of marriage. In this manner, my religious beliefs were respected at TWU.
35. At Douglas College I was also exposed to erotica, which was freely available on campus and in the library. I remember picking up a book and paging through the pictures even though this made me feel guilty. These same materials were not available on campus at TWU and I found that this put me in a position where I compromised my religious beliefs

less easily. At TWU, sexual fidelity and self-control were generally valued and therefore easier for me to practice, in keeping with my religious convictions.


36. The combination of the positive moral culture at TWU was undergirded with the Christian values of love and acceptance. Living in a religious community that held me to my own religious standards, but was gracious when I failed to attain these standards, helped me to develop a mature Christian faith.
37. Homosexuality was discussed openly and in great depth among students around campus and in classes. Homosexuality was one of the major hot topics of the day when I was attending TWU, as it was during the same time that marriage laws were expanded to include same-sex couples. I was part of a number of very lengthy discussions on sexuality and gay rights with other students.
38. I never witnessed any homophobic behaviour or heard any homophobic remarks during my entire time at TWU. Because I am gay, I have a heightened awareness to any mention of homosexuality around me. At the time I went to TWU, I was very sensitive about this issue and I would have remembered such remarks. I was also sensitive to how those around me perceived homosexuality and homosexual persons. In my experience, the subject of homosexuality was always dealt within the TWU community in a way that was honouring and respectful of homosexual students.
39. I specifically remember a philosophy class on ethical issues that devoted a great deal of time to the topic of homosexuality. The professor moderated the discussion while students expressed opinions, some of them very personal and emotional. It was a very open and respectful discussion.
40. With respect to my sexual orientation when I attended TWU, I felt encouraged by others by the open and loving environment. The environment at TWU gave me the courage to come out and reveal my gay sexual orientation to a number of other TWU students, as well as an on-campus Bible study leader, and at least one professor.

41. Not once did anyone at TWU even remotely reject me, shun me, or express any desire to change my sexual orientation.
42. I only received support, love, and deeper friendships from the TWU community as a result of coming out to them. When I came out, some of the students I came out to essentially expressed: "okay... so what!" My sexuality did not bother them. They continued to love and care for me after I told them I was gay.
43. I am very grateful for the open and loving environment I experienced at TWU, which was so important in my journey of accepting myself. At certain times in my life prior to attending TWU, I had experienced a certain sense of self-loathing that I believe is common to people who have an early awareness of a homosexual orientation that is coupled with a realization that this may not align with their religious sexual ethics. I understand how this realization can lead someone to question if there is something wrong with them, and whether they are damaged because they do not experience their sexuality in the same way that many of their Christian friends and family do.
44. The love and acceptance I found in the TWU community helped me come to an acceptance of who I was as a Christian and to better understand that God loves me and doesn't see me as a second-rate person, simply because I am gay. I felt myself amazed that Christians would be aware of my flaws, but not stigmatize or reject me at all. The people I met at TWU saw me the same way that I think God sees me, as his beloved creation. My sexuality is affected by the human condition of sin and separation from God, just like every other person gay or straight, but regardless of this I am no less valuable in God's sight or deserving of approval than other believers whose struggles might look different than my own.
45. My experience at TWU was not the only thing that led me to the place of self-acceptance that I find myself in currently. I also talked to other people in my Church community and talked to other Christian leaders. I had one Christian mentor who I met with on a weekly basis at his house to discuss issues involving both my faith and my sexuality. I was open

with him about all of my sexual desires. He and his wife showed me so much love and kindness.

46. I see coming to TWU as a time where I grew from a place of isolation and fear, where I did everything I could to protect myself, to a place where I learned how to be proud of who I am and to experience all of the benefits that come with knowing that I was loved and accepted by other people. At TWU, I experienced self-discovery and learned how open and loving the Christian community could be towards me, a gay Christian. I believe that learning so many different philosophical and theological issues allowed me to approach my sexuality in a more healthy and straightforward manner. I no longer see my sexuality as something to be afraid of.
47. Over the years since graduating, as I have continued to slowly open up to my other friends and family, I have never experienced rejection, fear, or judgment from the Christian community. This made me wish I had the courage to come out sooner to them.

SWORN BEFORE ME at the City of)
 Vancouver, in the Province of British)
 Columbia, this 28th day of July, 2014.)



 A Commissioner for taking Affidavits within)
 British Columbia)



 AUSTIN DAVIES

Andrew D. Delmonico
 Barrister & Solicitor
 100 - 32160 South Fraser Way
 Abbotsford, BC V2T 1W5
 (604) 864-8877



This is the 1st Affidavit
of Iain Cook in this case
and was made on July 22, 2014

No. S-142908
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TREVOR LOKE

PETITIONER

AND:

MINISTER OF ADVANCED EDUCATION OF BRITISH COLUMBIA and
TRINITY WESTERN UNIVERSITY

RESPONDENTS

AFFIDAVIT

I, Iain Cook, Writer and Musician, of Grand Rapids, Michigan, MAKE OATH AND SAY AS
FOLLOWS:

1. I am a musician and writer and alumnus of Trinity Western University ("TWU") and as such have personal knowledge of matters hereinafter deposed to, except where they are stated to be made on information and belief, and where so stated I believe them to be true.
2. I am a 30 year old male. I am a Christian.
3. I was born in Cape Town, South Africa. I am a South African citizen.
4. I moved to Hawaii when I was 13 years old.
5. I graduated from Makua Lani Christian High School in Kona, Hawaii in 2001.

6. I have, for most of my life, been strongly attracted to other men. I began for the first time to experience a very real attraction to women during university and have dated women.
7. I would not call myself “gay”, “bisexual”, or “heterosexual.” I don't subscribe to labels being able to describe the ineffable, which is what every human being, in my opinion, is. After being in relationships with both men and women, I believe now that my true self flourishes best when I am in a relationship with a woman. However, I still find that I have a high need for emotional and physical intimacy with other men.
8. I attended TWU at its campus in Langley, B.C. full time as an undergraduate student from September, 2003 until April, 2007. I graduated in the Spring of 2007 with a Bachelor of Arts in Communications. I was also a part time student at TWU in the Fall semester of 2007, when I took a music course.
9. I attended Calvin College from September, 2010, until May, 2013, when I graduated with a BA in Music. Calvin College is a liberal arts Christian college in Grand Rapids, Michigan. I estimate that the student body is slightly larger than TWU. Calvin College has a code of conduct somewhat similar to TWU.
10. I decided to attend TWU for a number of reasons. My goal was to get a degree from an internationally recognized, accredited university. TWU was both. The fact that TWU was a Christian school was also a big draw, as my Christian faith is an essential part of my life and my family's life. My sister was attending TWU when I began. I was also drawn by the small classroom size and emphasis on a Christian community.
11. I was awarded a TWU Presidential Scholarship upon entering TWU. At the time, it was TWU's most prestigious scholarship award. It could be renewed each year, depending on maintaining excellent grades.

12. I lived on campus while attending TWU my first three years. I lived off campus and commuted to TWU after my third year.
13. I was a Resident Assistant (RA) during my third year. As an RA, I was in a student leadership position as the leader of a residence on campus. This involved fostering the relational and spiritual development affecting residents in my dorm, leading and organizing social outings for them, and other responsibilities. I was also a video yearbook editor for TWU during my senior year. In my senior year I sat as one of two student representatives on the accountability committee.
14. The Christian community at TWU was one of the best parts of my time at the school, and still stands out to me as something that is rare and special that I have experienced in my lifetime. I still maintain many of the friendships that I developed while attending TWU.
15. Every year, I was required to sign TWU's code of conduct, which was at the time colloquially referred to as 'the Community Standards' or 'Responsibilities of Membership'.
16. Some aspects of the Community Standards were often, and openly, debated during my time at TWU. Students disagreed with various aspects of the Community Standards while I attended. I openly disagreed with some aspects of the Community Standards. However, I believe that many students (though not all of them) still attempted to adhere to them, including any aspects with which they may have disagreed, out of respect for the Christian character of the community that makes up TWU.
17. In my experience, the most contentious point of the Community Standards was the requirement to abstain from drinking alcohol. I understand TWU has since modified the rules on drinking, which at the time was a strict prohibition against drinking.
18. The stipulations regarding sex outside of marriage were not a particularly controversial component of the Community Standards. Growing up in the evangelical Christian

community, this was completely expected and was totally normal and accepted. I went to a Christian high school that taught abstinence, as well, and I had no reason or inclination to disagree or oppose a view of marriage as being between one man and one woman and sex being best reserved for only such relationships. I observed that these values were shared broadly amongst other members of the TWU community.

19. While attending TWU, I appreciated this culture at TWU that respected and encouraged abstinence, or abstaining from sexual intimacy outside of the Christian understanding of marriage. This was consistent with my evangelical Christian religious beliefs and background, which strongly encouraged that.
20. I generally respected the Community Standards while at TWU and tried to adhere to them, despite not agreeing with every aspect of them. For example, at times I felt that some of the rules, such as no gambling or drinking, were overly restrictive, and the wording of the Community Covenant felt too legalistic. Having said that, I always respected, and still do respect, TWU's prerogative to require certain behavioral standards for the members of its community. In my experience and opinion, they do reflect the religious beliefs of the community that makes up TWU.
21. In my experience, having lived in many different communities throughout my life, both religious and non-religious, I am convinced that TWU's Christian community is a rare and valuable thing. I generally felt very secure and valued within TWU's community and by other community members. It was a safe and comforting environment to practice my Christian beliefs.
22. When I first attended TWU, I did not feel free to share the fact that I had same-sex attractions. However, this was not as much due to the community and people at TWU *per se*, but was a result of the personal nature of sexuality, preconceptions of what TWU would be like, and my experience imported from other religious communities I had been involved in.

23. However, I increasingly found members of the TWU community who created a safe place for me to talk about my sexual feelings toward men.
24. There were several professors who had a reputation in the TWU community of being trusted confidants for students dealing with same sex attractions. I sought two of them and spent time talking with them. They gave me good advice. One of them in particular made me feel safe, loved, and like I was not a freak. Neither of them advised me to act in ways contrary to the Community Standards. They were very understanding and treated me with the love, respect and dignity that I would have expected within a Christian community.
25. I also found friends with whom I could be very open about my personal life at TWU. I first opened up to a friend of mine in the student residence that I found other men attractive. He was very loving and comforting towards me. I then found other friends who I could talk to, as well. I found that the ability to discuss my same-sex attractions in an environment that understood and respected my religious convictions was very therapeutic and healthy for me.
26. In my senior year, I wrote a paper for one of my Communications classes in which I analyzed the intense and obsessive feelings of attraction I was feeling towards another male student. The professor of the class expressed concern for me; this concern was based and expressed to me on the obsessive nature of the attraction, not necessarily because it was same-sex. The professor did not criticize me or make me feel unwanted, unsafe, inferior or unloved. Quite the contrary. He showed me Christian love and respect and I appreciated that greatly. I still respect and admire him greatly from afar.
27. The year after I graduated, I continued to live near TWU because I had such strong connections with the TWU community. I took one music class and worked near the campus.
28. In the fall of 2007 I wrote a very open and honest article in the TWU student newspaper,

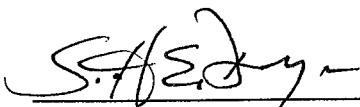
"Mars' Hill," about my experience as an evangelical Christian who continued to have sexual attraction toward other men. Attached as Exhibit A is a copy of the article that I wrote and was published in the Mars' Hill in the Fall of 2007.

29. The Mars' Hill is widely read among the TWU community. One of the editors of the newspaper at the time worked closely with me on the article and was incredibly supportive toward me.
30. The Mars' Hill article was published with my name on it.
31. When the paper came out, I remember feeling nervous. I felt like I had put myself out there in a very vulnerable way, and yet I did not know who had read the article and who had not. I felt sure it would be discussed on campus.
32. Several people discussed the article with me at great length. I recall these discussions as being open and encouraging.
33. My roommates at the time were TWU students, and I remember they were some of the first people who mentioned to me that they had read the article. They were supportive. They complimented me on being brave for writing it. I don't recall having any other conversations with them about the article.
34. One professor had a long talk to me because his son was gay.
35. Several students who were in a similar place as me reached out to me. Some seemed to be accepting homosexuality as their identity while others wanted to avoid embracing it. One of them since became a good friend of mine and is now happily married to someone of the opposite sex and has a child. Another student subsequently adopted homosexuality as his identity, and as far as I know still does.

36. Another student came up to me while walking on campus and thanked me for writing the article. He said he felt very honored to have spoken to me and that the article was deeply human.
37. Later that semester at a wedding I attended, a female stranger who I understood has also attended TWU pulled me aside, looked me in the eyes, and specifically thanked me in the deepest terms for writing that article.
38. I was incredibly proud of writing the article and of publishing it with my name on it. I was very thankful for the TWU community for providing a safe environment in which I could be authentic, honest, and vulnerable with others within that community.
39. I still look back at it as a very big part of my life story, and after spending years living in other communities since then, I have realized that being in a Christian community such as TWU that fosters such safety and encourages people to be real and authentic is something that I was lucky to have.
40. At TWU, I had professors who personally met with me and paid me individual attention. I had incredible friends who I got to live with, eat with, and enjoy awesome on-campus life with. I was referred to once by one of my professors as one of the school's best students. I had dinner at the President of TWU's house with others from my dorm.
41. In other words, I loved TWU. I didn't want to leave. Generally speaking, I felt celebrated, loved and cherished at TWU. I felt well-respected by the Christian community at TWU.
42. TWU empowered me to shape my own opinions and think critically as much as I could imagine possible. I have since met people who have told me that they were part of other religious institutions which discouraged critical thinking, and I remember being amazed that such places exist. I've always been a critical thinker, and still am, and that was encouraged at TWU.

43. Attending TWU gave me a much greater understanding of the western world, liberal arts, government, democracy, and the tradition of critical thinking. It deepened my faith by challenging me to ask all the difficult questions I had, and it stretched me as an artist and communicator by giving me opportunities to write, play music, take acting classes and study communication, among other things. The Christian environment at TWU provided a safe space to explore these and other issues, in a context that celebrated my religious beliefs and upbringing.
44. I never experienced intimidation, hostility, discrimination, exclusion, shunning, harassment, or threats at TWU for any reason, including expressing my same-sex attractions.

SWORN BEFORE ME at the City of Grand Rapids, in the State of Michigan, this 22nd day of July, 2014.



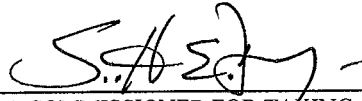
A Commissioner for taking Affidavits within the State of Michigan



IAIN COOK

My commission expires: 12/15/19

This is Exhibit "A" referred to in the Affidavit of
Iain Cook sworn/affirmed before me at Grand
Rapids, in the State of Michigan, this 22nd day of
July, 2014.



A COMMISSIONER FOR TAKING AFFIDAVITS
WITHIN THE STATE OF MICHIGAN

Living the questions

A student's personal experience of a much-debated subject

BY IAIN COOK

Over the years there has been a lot written in *Mars' Hill* regarding the subject of homosexuality: should it be condoned by Christians, should gay marriage be legal, etc. Bible verses are quoted, theories are put forth and evidence displayed all at

a happy distance from the author who writes, somehow as an expert, on a subject that has not personally affected him or her. I find these articles ultimately unsatisfying. They are too clinical, too academic and too argumentative. For me this is not theory, it's personal.

The single biggest cause of darkness in my life has been my struggle with lust. While most guys struggle with lust after girls, for some reason my struggle has always been almost entirely directed towards guys. I have no idea why. None of the normal "explanations" apply to me. I grew up in a very safe and stable home. I have incredible parents who are happily married and who love

and support me unconditionally. Also, I've had good male role models in my life and I was never molested as a child. Yet, since I was a boy, I have found myself strongly drawn to other guys. It has been, and at times still is, a very hard thing to know how to handle.

One of the hardest things about it is the feeling that I can't talk about it, which is a big part of why I am writing this article. There are the standard sexual temptations that guys will admit to struggling with—primarily masturbation, lustful thoughts about women and pornography, but not homosexuality.

I have been told that 50% of guys have homosexual feelings of varying degrees. Yet, if this is true, it certainly does not feel like it. For most of my life, my attraction toward other guys was my deepest darkest secret. I didn't dare share it with anyone for fear they would see me as a freak, someone essentially different who would be, at worst, completely shunned or, at best, tolerated.

Compounded with the fear of social rejection has been the confusion that comes when you find your sexuality and your religious beliefs to be seemingly irreconcilable. At times I have felt like the apostle Paul, with a thorn in my flesh or the rich young ruler, unable to give it all up and follow Jesus. This has been a serious cause

of depression in my life because there seemed to be only two possible futures. In one, I would fall in love with another guy, but the very choice of embracing that would simultaneously be a choice to turn my back on God. In the other, I would be lonely and single for life. I felt trapped and hopeless.

I'm not being melodramatic when I say that this is the type of thing that causes suicides. You feel desperately alone, hopeless, defective. You want something so badly while at the same

time you have the fact that you do. You honestly believe that being gay is wrong, yet the allure remains. You feel like if everyone knew who you were inside that no one would love you. Yet, all the while these things say bottled up inside you and it destroys you. Is this an addiction or is it who I am? Should I fight it or embrace it? Should I learn to live with it or should I celebrate it?

The times when I have believed that I would find fulfillment in being in love with another guy have been some of my darkest. I used to journal as an outlet for my depression. Here are some extracts from the times when it seemed too much to bear and from slightly lighter times:

On the most basic level, it entirely ruins your life. Every smile for your friends' romantic happiness is laced with sadness, with regret towards what you think you'll never have. I long for kids of my own, but will I ever be able to have them? I honestly have never been in love with a girl and so I wonder if I could ever be in love with a woman! If I can't, then I can't honestly get married... By being homosexually oriented, I am denied so many of the basic pleasures of life, and why? Why should it be that way? Is it really basically wrong for two people of the same sex to fall in love with each other or is it just so uncommon that it is socially unacceptable? And then... even then if it was accepted, it wouldn't work as far as having a family. Two

people of the same sex simply cannot share offspring. So, basically it sucks to be gay. There is no way around it, even if it were completely socially accepted, it would still suck...

NOTE: I am not gay, but if it weren't for the fact that I am enlightened, I might be.
...If I could change one thing in the world, I would make a world in which I could fall in love and it would be returned and I would actually be happy...

Looking back over these entries I know that I am in a better place today largely because I have found the freedom to talk about this. A few years ago, prompted, I believe, by the Holy Spirit, I opened up to a friend of mine. Since then, I have found other friends who have listened and loved me without condemnation as well as professors who have assured me that I am not the only one and have offered wise advice. Most recently, I did something that I had felt God telling me to do for years: I talked to my parents about this and it turned out to be a very constructive and liberating thing to do.

I wish I could conclude this article by saying that everything is great but it wouldn't be completely honest. Most of the time I am comfortable writing off any homosexual ideas as evil and destructive. Most of the time I can rest in the love of God and the hope that as I follow him one step at a time, he will give me every good thing. But there are times that I still feel lost, confused or frustrated, and that, I suppose, is part of what it means to be human.

Singles of the earth - unite!

The bane of the boring and infatuated

BY JOSHUA GREGG
FRAMES EDITOR

Some say young love is special. To them, I reply, "Nope!" Everyday

seeking insomniac—and like Creon in *Antigone*, you'll kill all your family for those condoms. Also, have you ever listened to the music that lovers listen to? Damn it, it sucks. It's almost as bad as listening to their irrational

answering machine is a useful tool to any normal person but not for the lover. The seemingly innocuous recorded words "I'll get back to you when I get the chance," are simply folly in these stupid relationships.



This is the 1st Affidavit
of Jason Cowan in this case
and was made on July 16, 2014

No. S-142908
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TREVOR LOKE

PETITIONER

AND:

MINISTER OF ADVANCED EDUCATION OF BRITISH COLUMBIA and
TRINITY WESTERN UNIVERSITY

RESPONDENTS

AFFIDAVIT

I, Jason Cowan, Lawyer, of Medicine Hat, Alberta, MAKE OATH AND SAY AS FOLLOWS:

1. I am a lawyer practicing in Alberta and alumnus of Trinity Western University ("TWU") and as such have personal knowledge of matters hereinafter deposed to, except where they are stated to be made on information and belief, and where so stated I believe them to be true.
2. I attended Trinity Western University (hereinafter, "TWU") as a full-time undergraduate student from September 1995 until April 1999, graduating with a Bachelor of Arts degree.
3. I returned to TWU as a student from September 2001 to April 2003, as a full-time student in the Bachelor of Science Program.
4. While a student at TWU, I was very involved in student life, living in a residence on campus for the first three years of my study and, at various times, holding positions such as Resident Assistant, Co-editor of the annual yearbook, and as a member of the Trinity Western University Student Ethics Committee. I also volunteered with various organizations on campus, including answering phones for a youth crisis hotline, orienting new students to the University, and participated in various cultural activities, and played and refereed in a number of intramural sports leagues. Through these activities and my


classes, I was acquainted with a large number of students, staff and faculty members, which I believe to be a representative sample of the TWU community.

5. In 2005, I applied to, and was accepted at, a number of Canadian law schools. I chose to attend the College of Law at the University of Saskatchewan, graduating in April 2008 with an L.L.B that has since been changed to a J.D.
6. During my time as a law student at the University of Saskatchewan, I was involved in student life as an active member of the Pro Bono Students Association, offering free legal services to economically disadvantaged persons. I was a member of the law school's intramural hockey team, and I volunteered to assist one of my professors with the completion of a number of refugee and immigration applications for members of the Iraqi community who were applying to come to Canada.
7. It was my experience during my time at TWU that diversity of opinion and dialogue was encouraged and fostered by faculty, staff, and students. While the majority, but not all, of the people I met on campus identified as Christian, I experienced a wide diversity of views and discussion. It was my experience that this diversity was respected and fostered by TWU and that critical thinking and discussion skills were developed and encouraged, consistent with a liberal arts university.
8. In my experience, the education I received while a student at TWU was of the highest standard. My professors were, virtually without exception, excellent and well-educated, holding me and other students to a high bar of excellence. Also, the small class sizes at TWU, and the culture fostered by the leadership of TWU created a unique situation where I could excel as a student and grow as a person. I also developed my skills in critical thinking and viewing situations from another person's perspective at TWU.
9. While attending TWU, I considered the Community Covenant (then referred to as the Community Standards) a matter of my own personal integrity. While there were aspects of the Community Covenant that I did not personally agree with, I believed that because I voluntarily agreed to it, I should follow it. The Covenant was, however, a topic that was discussed critically within the circles I frequented. I never felt such discussion was suppressed at TWU.
10. It was my experience that the Community Covenant played a positive in the TWU community in setting out the expectations for student behavior and assisting TWU to form a community culture that was distinctly based in the Christian faith, despite that not everyone at TWU was an evangelical Christian.
11. I identify myself as a Christian. My faith is integral to who I am and one of my chief motivations in everything that I do. However, I am mindful that those around me hold a variety of different worldviews, and I have always tried to encourage open dialogue and mutual respect of others.
12. During my time at TWU, I was friends or acquaintances with individuals who identify as gay or bisexual. While homosexual sexual behavior was not generally approved of by those on campus, the individuals in question remained important parts of the TWU

community, integrated in both my group of friends on campus and involved in a number of activities on campus.

13. While my experience as a law student at the University of Saskatchewan was generally positive, the dialogue at TWU was at least as open to understanding issues from other perspectives as the University of Saskatchewan. While I can not remember any incidents of individuals during my time at TWU being demeaned for their views on homosexuality, it was not uncommon to hear gay slurs used by other law students at the University of Saskatchewan College of Law during my time as a law student, though I would not characterize such behaviour as the norm at the University of Saskatchewan College of Law.
14. I am a member of the Law Society of Alberta and currently for the Province of Alberta as a Crown Prosecutor in Medicine Hat, Alberta. As part of my role, I am the Crown Prosecutor who deals with all domestic violence and youth matters at the docket stage. I also regularly run trials involving a variety of violent and non-violent crimes.
15. As a Crown Prosecutor, I interact with witnesses, victims and accused persons in highly volatile and sensitive situations. In this role, I regularly interact with people of all ages, cultural and socioeconomic backgrounds and sexual orientations. I believe that my Christian faith, as fostered at TWU, helps me see the world through the eyes of victims and offenders. As such, my experience at TWU has made me a better, more empathetic lawyer.

SWORN BEFORE ME at the City of)
Medicine Hat, in the Province of)
Alberta, this 18th day of JULY, 2014.)


A Commissioner for taking Affidavits within)
Alberta)

ANDREA N. DOLAN
A Commissioner For Oaths And
A Notary Public In And For
The Province Of Alberta
Being A Solicitor



JASON COWAN



This is the 1st Affidavit
of Jessie Legaree in this case
and was made on July 15, 2014

No. S-142908
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TREVOR LOKE

PETITIONER

AND:

MINISTER OF ADVANCED EDUCATION OF BRITISH COLUMBIA and
TRINITY WESTERN UNIVERSITY

RESPONDENTS

AFFIDAVIT

I, Jessie Legaree, Law Student, of Toronto, Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am a law student at the University of Toronto and alumna of Trinity Western University ("TWU") and as such have personal knowledge of matters hereinafter deposed to, except where they are stated to be made on information and belief, and where so stated I believe them to be true.
2. I attended TWU during 2006-2010 for my Bachelor of Arts with a major in political studies and a minor in philosophy. From 2010 to 2014, I also attended TWU for my Master of Arts in Interdisciplinary Humanities with a focus on constitutional history. I attended classes at TWU for my Masters during 2010-2012.
3. During my six years attending TWU, I wrote for the student newspaper, the Mars' Hill, and was involved with several clubs, one of which I led. I also spent a semester at TWU's Laurentian Leadership Program ("LLC") in Ottawa. As part of that program I interned with the Policy Division of the Prime Minister's Office.
4. I began studying law at the University of Toronto Faculty of Law in 2012. I have finished my second year. I am scheduled to graduate in 2015.
5. I am a Christian. I believe the Bible is the inspired Word of God and order my whole existence upon its teachings. I believe every person is created in the image of God and is

equal before Him. I believe our greatest calling is to love God and this is reflected by serving His people. At TWU, my unique calling was affirmed to serve humanity through advocacy and it is for this reason that I am entering the legal profession.

6. I grew up in Langley, B.C. I did not have any desire to attend TWU until I visited its campus. During my visit, I found that the environment was far more welcoming at TWU than I had experienced in public school. From what I observed, rather than ruthlessly compete or tear each other down, TWU offered a community of support for strangers and friends alike. I was also influenced by attending its Access Ottawa program, a TWU program that sends high school students on a weeklong trip to its LLC in Ottawa. Because of the centrality of my faith to me, I was excited to learn and grow spiritually, as well as be challenged academically.
7. My positive initial welcoming impressions were confirmed while attending TWU. TWU created an environment without the cliques of public school, and where could freely talk to anyone - including professors. Professors at TWU cared to know who I was beyond what my interests may be in a particular subject and how they could be of guidance.
8. My undergraduate and graduate courses at TWU were challenging, interesting, and varied. As a liberal arts institution, I felt TWU encouraged me to use my mind in different ways and expose me to a broad range of topics. I felt that TWU gave me an education that developed my mind and person. I recall attending many debates held at TWU and in the classroom where a plurality of views were presented on how various disciplines interact with faith. For example, I distinctly recall participating in a classroom debate on whether the idea of “progress” is inherently good, with professors representing views of both subjective and objective truth.
9. I was sometimes surprised by the diversity represented in the TWU community. For example, there were professors at TWU who publicly shared that they did not hold traditional religious views.
10. Every person comes to TWU with a different religious (or non-religious) background, including professors and students. At TWU, I spent a significant amount of time in philosophy classes and debating politics. I found professors and other students respectful of divergent views. This was never as clear as during my course “Philosophy of Sex and Gender” where there were a wide spectrum of views of gender that were freely discussed in class. I felt that professors and students were also mindful that non-Christians attend TWU; in my experience, no student was ever singled out or penalized for holding a different worldview than Christian. In fact, in my “Reason and Belief in God” course, students were invited to write a paper that denied God’s existence.
11. Within Christianity, there are different views of sexual morality and marriage. I do not recall a single time anyone belittled a different view of homosexuality or a non-Christian worldview. In my experience, these areas were handled with the utmost sensitivity. Professors welcomed students to share their views either publicly or privately. There were many debates on Christianity that are also contentious and represented on campus;

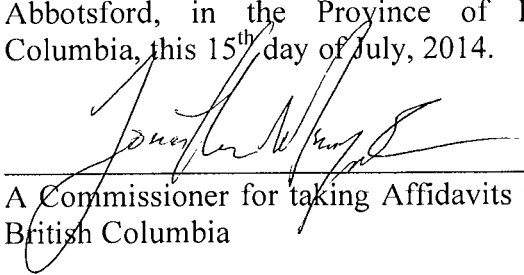
for example, the Genesis creation account, environmental stewardship, divorce, the role of women, and predestination.

12. I often disagreed with my professors in their assessment of the proper role of the state or contemporary governing issues. I felt free to discuss my ideas in class and was never scolded for not agreeing with the status quo.
13. At TWU, I came to a deeper understanding of the relationship of how to practice my faith in society.
14. I believe the Responsibilities for Membership is an important document. I annually signed the Responsibilities of Membership, which later became the Community Covenant. Before accepting my offer of admission at TWU, I read every word of it to ensure these were values I shared or was willing to abide by while a member of the TWU community. I believe this document is a benefit to the TWU community.
15. In my time at TWU, people openly debated the benefits and disadvantages of various aspects of the Community Covenant. Just two years before I began at TWU, the school hosted its first dance, which had been long forbidden at TWU. It was common knowledge that it was the students who successfully lobbied for this change, despite the fact that the beliefs of some students at TWU do not permit dancing in public.
16. The Community Covenant was further amended while I was a student at TWU. Among other things, this changed the provision related to drinking alcohol off campus. Several of my professors and fellow students expressed support for this change many years before it happened. Even though I did not wholly agree with these changes, I felt entirely open to speak with faculty and fellow students about my objections. I never felt ostracized nor was I reprimanded for having done so.
17. My adherence to the Responsibilities for Membership and Community Covenant while at TWU will in no way affect my future ability to represent clients of all beliefs and sexual orientations in my legal practice. I have no desire to cast judgment on the lifestyle of my future clients. I simply aspire to represent them to the best of my ability.
18. I felt that I entered law school fully prepared because of the outstanding education I received at TWU. Because I felt that the education I received at TWU was of my whole person (intellectually, emotionally, spiritually), I was ready to be challenged academically and spiritually at law school.
19. As a religious individual, I have felt that law school is generally a hostile environment for those who hold religious views. For example, professors were comfortable making disparaging remarks in class about religion; this includes invoking the name of Jesus Christ in hypotheticals. When discussing universal human rights, students and professors sought legitimacy by making clear they were Atheists. As a Christian, these remarks made me feel uncomfortable. Religion is not positively discussed in or outside of the classroom. In my law faculty, there is not a single professor who shares my evangelical

Christian faith - at least not publicly. The law school ethos is generally socially progressive, with very few opportunities for socially conservative students to participate.

20. I was given advice by a Christian lawyer prior to entering law school to “keep your head down” and to not tell anyone that I am a Christian. I could not do that. People know I am a Christian, but it resulted in my becoming withdrawn in my law school community. Since starting law school, I have felt that I am not entirely free to discuss my beliefs and have become far more introverted. During law school orientation, students underwent mandatory instruction where we were told it is our duty to stand up to bigoted remarks; a scenario used to exemplify unacceptable conduct and the duty to intervene was a student making comments labeled “homophobic” that reflected a belief in traditional marriage. This was a clear indication that only socially progressive views would be tolerated and of great concern to me. It made me feel nervous and isolated, unable to feel like my religious identity was welcomed within the law school community.
21. Conversely, at TWU, I was engaged in my classes, knew my professors well, and participated in social events; this made for a much better educational experience. I felt free to discuss my views as well as to have them challenged in a respectful manner as I refined my own worldview. I have found that social events for law students generally centre around drinking alcohol, so I do not participate. This was certainly not the case at TWU, even when drinking off campus was permitted.
22. My experience with law school is that it is generally one dimensional: what the law is. Save one week and part of a course used to go over the Code of Professional Conduct, we have not discussed the ethical obligations of a lawyer and what integrity entails.
23. If I could have, I would have applied to the Juris Doctor program at TWU. For myself, there is something critical missing from my current law school: how to reconcile my faith and the practice of law. I would appreciate a learning environment that encourages discussion of matters that go to the very heart of my identity. This is a critical topic for me to learn as part of my vocation in entering the legal profession.

SWORN BEFORE ME at the City of)
Abbotsford, in the Province of British)
Columbia, this 15th day of July, 2014.)


A Commissioner for taking Affidavits within)
British Columbia)

Jonathan B. Maryniuk
Barrister & Solicitor
100 - 32160 South Fraser Way
Abbotsford, BC V2T 1W5
(604) 864-8877


JESSIE LEGAREE



This is the 1st Affidavit
of Natalie L. Hebert in this case
and was made on July 7, 2014

No. S-142908
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

TREVOR LOKE

PETITIONER

AND:

MINISTER OF ADVANCED EDUCATION OF BRITISH COLUMBIA and
TRINITY WESTERN UNIVERSITY

RESPONDENTS

AFFIDAVIT

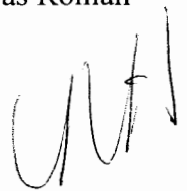
I, Natalie L. Hebert, Lawyer, of 201 – 907 Baker Street, Cranbrook, B.C. MAKE OATH AND
SAY AS FOLLOWS:

1. I am a lawyer practicing in British Columbia and alumna of Trinity Western University ("TWU") and as such have personal knowledge of the facts and matters hereinafter deposed to, except where they are stated to be made on information and belief, and where so stated I believe them to be true.
2. I received my LL.B. from the University of Manitoba in 2007.
3. I am currently employed as a lawyer with the law firm of Rockies Law Corporation located in Cranbrook B.C.
4. I have been a member in good standing of the Law Society of British Columbia since 2008. Attached as Exhibit "A" to my Affidavit is a true copy of my curriculum vitae.

A handwritten signature in black ink, appearing to be "N. Hebert", located at the bottom right of the page.

Attendance at TWU

5. Before attending TWU, I completed my first two years towards an undergraduate degree at the University College of the Cariboo, Williams Lake Campus – now known as Thompson Rivers University, Williams Lake Campus.
6. I attended TWU for three semesters, and graduated with an undergraduate degree from TWU in Psychology in December of 2003.
7. I was raised in what I would consider a fairly open-minded Christian household. My dad was a University professor and my mom was a teacher. Despite my Christian upbringing, however, I was questioning the existence of God when I transferred to TWU and would not have considered myself a practicing Christian at that time. I chose to attend TWU because I had heard of its strong academic record. I thought that it would be an appropriate choice for completing my undergraduate degree with a view to getting into law school.
8. When I first applied for admission at TWU, I recall that I was required to sign a document called the “Responsibilities of Membership”. I understood that this document set out the community standards applicable to students attending TWU.
9. Being that I was not a practicing Christian when I first applied for admission at TWU, the moral principles expressed in the Responsibilities of Membership were not necessarily reflective of my personal moral values at that time. However, I strove to abide by the moral standards set out in the Responsibilities of Membership during the time that I attended TWU because I knew that they were an expression of the religious beliefs of the TWU community that I had agreed to belong to. When I chose to attend TWU, I made a conscious decision to go to a university that maintained and espoused expressly evangelical Christian beliefs. In choosing to become a member of TWU, I believed it incumbent on me to try and respect the values of the community.
10. As a transfer student from another university, I did not know anyone when I first attended TWU. However, I had no difficulty making friends and getting plugged into the TWU community. I recall that both faculty and fellow students went out of their way to make me feel welcome.
11. As mentioned above, when I was a student at TWU, I did not consider myself a Christian and questioned whether God existed at all. Despite the fact that most of my friends and classmates at TWU were quite open about their evangelical religious beliefs, I never felt pressured by other community members to accept or endorse those beliefs. I don’t recall being made to feel any less welcome or accepted when my classmates learned that I did not share their religious worldview.
12. While at TWU, I recall engaging in a-lot of very open conversations about a number of topics. In my dorm, religion was among the most frequently discussed issues. My first year roommate at TWU was a Buddhist. Another year I had a roommate that was Roman



Catholic. I did not recommit my life until partway through my first semester of attendance. However, despite the fact that I had recommitted my life, the beliefs or denominational views that I held were vastly different from the majority of people at TWU. Most of the other people that I knew identified as evangelical Christians. In my experience, despite the fact that my religious views did not align with the majority of my roommates, I found that discussions around this subject were informative and mutually respectful. I don't ever recall being disparaged or insulted for my lack of or difference of viewpoint. On the contrary, my other dorm mates appeared interested to learn about religious viewpoints and perspectives that differed from their own.

13. A similarly inclusive atmosphere was reflected in the classroom settings that I participated in. I knew that all of my professors were evangelical Christians who maintained different beliefs than my own. These professors were very open about their religious identity. However, never once did any of my professors tell me that I was wrong when I expressed my views. I felt like no matter the issue being debated, I was invited to think for myself and reach my own conclusions.
14. I recall one occasion in particular that, to me, demonstrated the welcoming and inclusive community environment that I associate with TWU. In my final year at TWU, one of my professors invited a transgendered person to be a guest speaker in my Human Sexuality course. I was aware from prior class discussions that many of my fellow classmates were Christians. However, I remember being very impressed with the accepting attitude displayed by my fellow classmates when addressing this guest speaker, despite the fact that his views may have clashed with their religiously informed understandings of gender and sexuality. From what I could observe, the other students in the class seemed genuinely interested in understanding the speaker's experiences, and were sensitive in communicating their own positions. I don't recall any negative or disparaging remarks ever being made to or about this speaker. At the end of the speaker's presentation, I recall him specifically thanking the students in the class for their warm reception and sensitivity. I am aware that this speaker has returned to share his story with TWU students on several subsequent occasions.

Life after TWU

15. I have read the Community Covenant, which I understand replaced the Responsibilities of Membership document that I signed, and agree with the Christian moral values expressed therein.
16. When I attended law school at the University of Manitoba, I felt that the Christian moral values I had come to embrace were not respected, or even tolerated. I again found myself in the position of being a minority viewpoint, but this time my experience was totally different. I observed that other people in my classes were treated poorly when they expressed viewpoints on moral issues that aligned with my Christian values. If my views differed from the majority, I knew that in voicing them I would be subject to degrading comments and standoffish behaviours from others.

17. Although when I signed the Responsibilities of Membership I was not a practicing Christian, I respected what I believed TWU was trying to accomplish in requiring its students to adhere to these moral guidelines – to create an environment hospitable to the religious beliefs of the majority of Christian students and faculty attending there. I believe that the opportunity to attend a law school that nurtured my religious beliefs would have been a very positive experience. I am familiar with the proposal put forward by TWU in respect to its School of Law and believe I would have considered attending had this option been available to me.
18. Since graduating law school, I have developed a practice that concentrates in the area of family law. As a family lawyer, I work with families from many different backgrounds during a very difficult time in their lives. I am frequently required to act for people whose views on marriage, divorce and sexuality differ from my Christian values. I have no issues with accepting same-sex clients in my practice and would not treat them any differently than any other client. The fact that my Christian views affirm that marriage is a lifelong commitment between one man and one woman does not prevent me from giving equal treatment to clients dealing with family law issues arising from same-sex relationships.
19. I have never allowed my personal beliefs to affect the way that I provide legal services to my clients. As a member of the legal profession in British Columbia, I took an oath that prevents me from perverting the law to favour or prejudice anyone and requires me to uphold the rule of law and the rights and freedoms of all persons. I take this oath very seriously and I would consider it a breach of my professional obligations to treat any person, including a person of same-sex orientation, differently or to provide a lesser standard of service because that person's family relationship is different than what my Christian beliefs might treat as normative.
20. I consider my professional obligation to provide legal services in a non-discriminatory manner as being entirely consistent with the community values I accepted while at TWU.

SWORN BEFORE ME at the City of)
 Cranbrook in the Province of British)
 Columbia, this 7th day of July, 2014.)

A Commissioner for taking Affidavits within)
 British Columbia)

MARKO M. MARYNIAK, J.D.
 Barrister & Solicitor
 Suite 201, 907 Baker Street
 Cranbrook, BC V1C 1A4
 Canada 250-426-7211


 NATALIE L. HEBERT

NATALIE LYNN HEBERT

Permanent Address: 311 7th Ave S., Cranbrook, BC V1C 2J8 Home: 250.421.4191 Office: 250.426.7211

Email Address: Home: four_bears@shaw.ca Office: Natalie@rockieslaw.com

Education

BACHELOR OF LAW

YEARS ATTENDED: 2004-2007

University of Manitoba

Winnipeg, Manitoba

- *Dean's Honours List 2006 and 2007/ Pitblado Scholar
- *2007 Highest Grade in 3rd Year Class (for the year)
- *Won Second Place in the Moot Negotiations Competition
- *Member of the Yearbook Committee (2005/2006)
- *Member of Phi Delta Phi and The Christian Legal Fellowship

BACHELOR OF ARTS

YEARS ATTENDED: 2002-2003

MAJOR IN PSYCHOLOGY/MINOR IN ENGLISH

Trinity Western University

Langley, British Columbia

- *Graduated with Honours
- *Member of the Undergraduate Psychology Student Initiative group

ASSOCIATE OF ARTS

YEARS ATTENDED: 1998-2002

CONCENTRATION IN PSYCHOLOGY

Thompson Rivers University

Williams Lake, British Columbia

(Formerly Known as University College of the Cariboo)

- *Secretary of the Student Council for 2 years

Employment

Lawyer

YEARS EMPLOYED: 2011-CURRENT

Rockies Law Corporation

Cranbrook, B.C.

- * Practicing Lawyer May 2011 to Current
- * General Practice: Family, Wills & Estates, Civil Litigation, MHRP

Lawyer

YEARS EMPLOYED: 2007-2011

Vanderburgh & Company

Barristers and Solicitors

Williams Lake, B.C.

- * Articled May 2007 to May 2008
- * Practicing Lawyer May 2008 to May 2011
- * General Practice: Family, Wills & Estates, Civil Litigation, Corporate, Commercial, Real Estate, Criminal Defence, MHRP

City Councillor

YEARS EMPLOYED: 2008-2011

City of Williams Lake

Williams Lake, B.C.

- *Portfolio: Social Services and Environment 2008-2011

Student Research Assistant

YEARS EMPLOYED: 2005-2007

*Dr. D. Guth, Faculty of Law,
University of Manitoba*

Winnipeg, Manitoba

- *Compilation of research on Canadian and International Law Schools
- *Independent Work

This is Exhibit "A" referred to in the
affidavit of NATALIE L. HEBERT
sworn before me at CRANBROOK
in the Province of British Columbia,
this 7th day of July, 2014
Signature

Nanny **YEARS EMPLOYED: SUMMER 2005 & 2006**
Dr.'s John Kachope and
Jane Namusuubo-Kachope **Williams Lake, British Columbia**

- *Responsible for creating a structured learning time
- *Ensured their timely arrival at scheduled lessons
- *Taught the children music theory
- *Prepared meals

ADMINISTRATOR/TEACHER **YEARS EMPLOYED: SUMMER 2004**
Canadian Psychometric Services
R.U.C.K.U.A.S. Program **Williams Lake, British Columbia**

- *Kept the files up to date
- *Organized daily activities
- *Planned appointments for the head psychologist
- *Worked one-on-one with a student who had a severe reading impairment
- *Upon conclusion of the program helped write official assessments for 10 students

STUDENT ORIENTATION STAFF **YEARS EMPLOYED: FALL 2003**
Trinity Western University **Langley, British Columbia**

- *Welcomed new students during Orientation Week
- *Was a Student Teacher of University 101
- *Taught classes, graded assignments (including the final essay), posted grades

STUDENT LIBRARY STAFF **YEARS EMPLOYED: 2003**
Trinity Western University **Langley, British Columbia**

- *Signed books both in and out/shelved the books
- *Helped students locate books

**CUSTOMER SERVICE REP/
COPY CENTRE ASSOCIATE** **YEARS EMPLOYED: 2001-2004**
Staples Business Depot **Williams Lake, British Columbia**

- *Responsible for both cashing in and out a till
- *Responsible for taking and fulfilling copy orders
- *Filled the position of Temporary Copy Centre Lead
- *Responsible for ordering supplies and running the Copy Centre
- *Trained the new Copy Centre Lead and other new staff

CATALOGUE/FLOOR SALES **YEARS EMPLOYED: 1998-2001**
Tardiff Enterprises
Past Owner of Sears **Williams Lake, British Columbia**

- *Responsible for receiving freight and retrieving freight for customers
- *Responsible for selling large items (i.e. appliances, electronics)
- *Responsible for the Daily Accounts Receivable
- *Responsible for stocking the electronics department

Volunteer Work

ACCESS JUSTICE

YEARS: 2008-CURRENT

Williams Lake, B.C./ Cranbrook, B.C.

*Pro Bono legal advice

WILLIAMS LAKE POWDER KINGS

YEARS: 2009-2010

* Secretary for the snowmobile club

Williams Lake, B.C.

VOLUNTEER DANCE INSTRUCTOR

YEARS: 2008-2009

*taught ballroom dance, swing dance and latin dance
once per week in Williams Lake

Williams Lake, B.C.

WILLIAMS LAKE STUDIO THEATRE

YEARS: 2008-2009

Actress

Williams Lake, B.C.

*Acted in "Honk!" and "I Never Saw Another Butterfly"

OPERATION CHRISTMAS CHILD COORDINATOR

YEARS: 2004-2005

Christian Legal Fellowship, Student Chapter

Winnipeg, Manitoba

*Coordinated pick-up and drop-off of supplies and boxes
* Contact person

SUNDAY SCHOOL COORDINATOR

YEARS: 1999-2002

Lake City Christian Centre

Williams Lake, British Columbia

*Responsible, with one other person, to provide curriculum
*Scheduled teachers and helpers for each service (3 times per week each month)
*Taught classes

YOUTH LEADER

YEARS: 1993-2001

Lake City Christian Centre

Williams Lake, British Columbia

*Planned activities, including annual ski trips and summer camp outs

YOUTH TASK FORCE

YEARS: 2001

Williams Lake City Council

Williams Lake, British Columbia

*Helped communicate the needs, desires of youth in the community
*Helped communicate means of affecting change in youth deviance

Publications**US-CHINA LAW REVIEW**

* N. L. Montoya (June 2010). Ethical and legal dilemmas surrounding bio-banking. P. Carrington *et al.*, Ed. *US-China Law Review*. Libertyville, Illinois: David Publishing Company, Vol.7, No. 6, at 22-34.

* N. L. Montoya (March 2010). The Niqab in Canada: Is it a charter right?. Cecily, Z. *et al.*, Ed. *US-China Law Review*. Libertyville, Illinois: David Publishing Company, Vol.7, No. 3, at 30-46.

Skills

- * Experience in legal research, including Quicklaw and Westlaw
- * Operation of a Switchboard
- * Fluidity in operation of Microsoft Word and aspects of WordPerfect 12
- * Excellent interpersonal communication skills

Interests

- *Attend the Gym/Martial Arts/Swimming/Socials/Movies
- *Theatre Work
- *Snowmobiling/Cross-Country Skiing
- *Quilting and Card Making
- *Reading and Writing Poetry, Books, and Music
- *Play the Piano (Grade 2 Theory and Grade 4 Royal Conservatory)
- *Child and Youth Work

References

Available Upon Request