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Folder Title:

Governor Jeb Bush Lawsuit

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DOCUMENT NO.	FORM	SUBJECT/TITLE	PAGES	DATE	CLASSIFICATION	RESTRICTION(S)
001	Court Filing	Complaint for Declaratory Judgment and for an Injunction [page 4 redacted]	1	07/22/2005		P6/b6;
002	Letter	[Letter to Governor Bush from Liza McFadden] - To: Governor Bush - From: Liza McFadden	1	02/28/2005		P6/b6;

COLLECTION TITLE:

Faith-Based & Community Initiatives, White House Office of

SERIES:

Henderson, Kristin - Outreach State Contact Files

FOLDER TITLE:

Governor Jeb Bush Lawsuit

FRC ID:

9195

RESTRICTION CODES

Presidential Records Act - [44 U.S.C. 2204(a)]

- P1 National Security Classified Information [(a)(1) of the PRA]
- P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
- P3 Release would violate a Federal statute [(a)(3) of the PRA]
- P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
- P5 Release would disclose confidential advise between the President and his advisors, or between such advisors [(a)(5) of the PRA]
- P6 Release would constitute a clearly unwarranted invasion of personal privacy [(a)(6) of the PRA]

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- b(4) Release would disclose trade secrets or confidential or financial information [(b)(4) of the FOIA]
- b(6) Release would constitute a clearly unwarranted invasion of personal privacy [(b)(6) of the FOIA]
- b(7) Release would disclose information compiled for law enforcement purposes [(b)(7) of the FOIA]
- b(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
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IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA

RICHARD HULL, ELAINE HULL, AND
COUNCIL FOR SECULAR HUMANISM,

Plaintiffs,

Case No. 05-CA 176

v.

JOHN ELLIS "JEB" BUSH, in his official
capacity as Governor of the State of Florida,
TOMMY GALLAGHER, in his official capacity
as Florida Chief Financial Officer, CHARLIE
CRIST, in his official capacity as Florida Attorney
General, JOHN A. BRABSON, in his official capacity
as Chairman of the Governor's Faith Based &
Community Advisory Board, and WORKFORCE
FLORIDA, INC.,

Defendants.

COPY
FILED
CIRCUIT CIVIL DIV.
05 JUL 22 PM 1:00
BUSH HALL
CLERK CIRCUIT COURT
LEON COUNTY, FLORIDA

COMPLAINT FOR DECLARATORY JUDGMENT AND FOR AN INJUNCTION

1. This lawsuit is brought for declaratory and injunctive relief. Plaintiffs challenge the constitutionality of the creation, existence, and continuing activities of the Governor's Faith-Based & Community Advisory Board (hereafter the "Faith-Based Board"), which was initially a volunteer organization that the defendant John Ellis "JEB" Bush (hereinafter "Bush") created on the National Day of Prayer in

May 2002. On November 15, 2004, the previously "volunteer" organization became, purportedly, an official adjunct of the State of Florida when the defendant Bush promulgated, by an arrogation of power he did not have, Executive Order No: 04-245 (Exhibit A hereto, which is incorporated herein by reference and is hereinafter referred to as the "Initial Executive Order.") The defendant Bush amended the Initial Executive Order by Executive Order 05-24 (Exhibit B hereto, which is incorporated herein by reference and is hereinafter referred to as the "Executive Order.") The amendment itself was not substantive, but the latter document reaffirmed and reincorporated the substantive provisions of the Initial Executive Order.

2. The Executive Order, the activities, and the existence of the Faith-Based Board violate at least two provisions of the Florida Constitution: (a) Article I, Sec. 3, which provides that "[n]o revenue of the state or any political subdivision or agency thereof shall ever be taken from the public treasury directly or indirectly in aid of any church, sect, or religious denomination or in aid of any sectarian institution" (emphasis supplied); and (b) the incorporated Establishment Clause of the First Amendment to the United States Constitution, which is made part of the Florida Constitution by the Fourteenth Amendment and which prohibits Florida from engaging in activities "respecting an establishment of religion."

JURISDICTION AND VENUE

3. The Court has jurisdiction of this action under Article V, Sec. 20(c)(3), of the Florida Constitution and under Fla. Stat. Sec. 26.012(2)(c), (3).
4. Venue lies in this Court because defendants, in the capacity sued, maintain their principal places of business in Leon County.

PARTIES

5. Plaintiff, the Council for Secular Humanism (hereinafter the "Secular Council") is a membership organization which is incorporated under the laws of the State of New York and is organized in compliance with the provisions of I.R.S. Code Section 501 (c) (3).
6. The Secular Council has an institutional interest in the maintenance of the republican form of government guaranteed to Florida and to all other States by the United States Constitution and, more particularly, in the maintenance of a crucial component thereof: the effective separation of government institutions from religious institutions by rational preclusion of their entanglement.
 - a. The Secular Council is a "person" under Fl. Stat. Sec. 1.01.
 - b. The Secular Council has applied for a license to do business in Florida under said Act.
7. The Secular Council brings this lawsuit on its own behalf to protect a substantial portion of its membership and its institutional interests in preserving the intent of the founders of the United States that there be,

and that there be maintained, a clear and definitive separation of all government institutions from all religious institutions.

8. The Plaintiff Richard Hull is a resident and citizen of Florida who pays taxes to the State of Florida and who presently resides at (b)(6)

(b)(6) Richard Hull is a member of the Secular Council. He resides within the territorial jurisdiction of the Court. Richard Hull has a direct interest in this action in that he regularly contributes to the revenues of the State of Florida and is affected personally and detrimentally by the unconstitutional misappropriation of said revenues as is hereinafter described.

9. The Plaintiff Elaine Hull is married to Richard Hull and is a resident and citizen of Florida who pays taxes to the State of Florida. She also presently resides at (b)(6)

(b)(6) Elaine Hull is a member of the Secular Council. She resides within the territorial jurisdiction of the Court. Elaine Hull has a direct interest in this action in that she regularly contributes to the revenues of the State of Florida and is affected personally and detrimentally by the unconstitutional misappropriation of said revenues as is hereinafter described.

10. The defendant Bush is Governor of Florida. Bush is sued in his official capacity.

11. The defendant Tommy Gallagher (hereinafter "Gallagher") is Chief Financial Officer of Florida. As such, Gallagher is responsible for authorizing or monitoring the disbursement of state funds including those expended as payments to implement the Executive Order. Gallagher is sued in his official capacity.
12. The defendant Charlie Crist (hereinafter "Crist") is Attorney General of Florida. Crist is the chief legal officer of Florida. As such, Crist is responsible for enforcing the laws and constitution of Florida. Crist is sued in his official capacity.
13. The defendant John A. Babson (hereinafter "Babson") is Chairman of the Faith-Based Board. The defendant Babson was appointed as Chairman by the defendant Bush. The defendant Babson is sued in his official capacity as Chairman of the Faith-Based Board.
14. The defendant Workforce Florida, Inc. (hereinafter "WFI") states on its website that it is "the state's [Florida's] workforce policy board - planning, budgeting, program guidance, performance, accountability and strategic state-wide partnerships [sic]. WFI issues RFP's [Requests for Proposals] and awards discretionary grants." The defendant WFI was created at the instance of the defendant Bush with the passage of the Workforce Innovation Act of 2000, Chapter 445, Florida Statutes. The defendant Bush has appointed a 45 member WFI

board, which he oversees and monitors. The defendant WFI is a corporation whose legal identity is distinct from that of the State of Florida. However, its operations are funded, in substantial part, from Florida revenues drawn from the Florida Treasury. The defendant WFI is a *de facto* alter ego for the Faith-Based Board and acts as its facilitator, fiscal agent, administrator, or implementer.

FACTS

15. The Faith-Based Board purports to have been created lawfully by the Executive Order, which has been accorded the effect of law since at least the time that the Initial Executive Order was proclaimed in November, 2004.
16. The Executive Order expressly provides that funds or assets made available to the Faith-Based Board shall be used to coordinate, encourage, and advise religious or sectarian organizations as to means and methods to become recipients of revenues of the State of Florida.
17. In practical fact, and now through demonstrable experience, the Executive Order, facially and in implementation, does not remotely meet the "religious neutrality mandate" of the First Amendment of the U.S. Constitution. On fair examination, it cannot be contested with a straight face that the Executive Order does nought but set up a *de facto* program for state favoritism toward monotheistic belief systems. The "fig leaves" in the Executive Order do not change the reality. If the

Court will indulge Plaintiffs in a mixed metaphor -- this particular "emperor," on close examination, is as naked as a jay bird.

18. For example, the Executive Order implicitly requires favored treatment of Faith-Based Organizations by stating that "[e]ach executive agency is directed...to render assistance and cooperation to the [Faith-Based] Board...", which in turn, is itself directed and was created "in order to help state government coordinate efforts to...expand opportunities for faith-based...organizations."
19. The Executive Order has no provision stating that a Faith-Based organization may not compel or encourage a person receiving state benefits to profess a specific ideological belief, to pray, or to worship. Indeed, the Executive Order does not bar participating entities from compelling beneficiaries to attend worship services and prayers.
20. Neither does the Executive Order require that employees or beneficiaries be permitted program access, funding, or employment on a "religion-neutral basis." In fact, "religious neutrality" under the Executive Order is a joke (receiving only occasional lip service), and the defendants treat it as such. That fact is widely accepted. For example, the National Catholic Reporter, as far back as November, 2002, acknowledged:

"a tacit acceptance of employment discrimination among government funders and faith-based organizations -- a don't-ask-don't-tell-policy for the armies of compassion. Commented one advocate for Catholic social service programs: 'How many non-

Catholic directors of Catholic Charities programs do you see?
That's an area best left unexplored, said the advocate."

21. The Executive Order places no true restrictions on the Faith-Based Board or on how any benefited Faith-Based program may expend public funds that are paid to them or indirectly obtained for them on a favored basis. Thus, sectarian programs are free in practice to use the provided public funds for religious purposes, such as religious indoctrination, worship, prayer, and religious training and instruction – whether participation in such activities is voluntary or compelled. At a minimum, the public funds provided to a particular sectarian organization permit diversion of funds to sectarian purposes by relieving the Faith-Based organization of non-sectarian financial burdens.
22. The State of Florida funds provided, directly or indirectly, to the Faith-Based Board pursuant and in obedience to the Executive Order, or the funds provided to "sectarian institutions" through the Faith-Based Board's efforts, can be and are used, directly or indirectly, for example, either to pay the salaries or stipends of clergy, members of religious orders, and others who provide religious training and instruction; to purchase Bibles, Korans, religious textbooks, textbooks that present other subjects from a religious point of view, and other religious literature; to purchase and display religious symbols; and to build and maintain chapels, synagogues, mosques, or other facilities used for

religious worship; or otherwise to subsidize the religious missions of these sectarian organizations. In point of fact, even if the State of Florida revenues were used by a Faith-Based organization to pay utility bills, the inevitable effect would be to subsidize the religious mission of the institution in direct contravention of the perfectly plain language of the Florida Constitution.

23. The Executive Order has resulted, and will continue to result, in the unconstitutional expenditure of public funds in violation of the provisions of the Florida Constitution as hereinbefore referenced. The Faith-Based Board's Initial Report (hereinafter "Initial Report"), which is annexed hereto as Exhibit C and incorporated herein by reference, provides the following information about the operations of the Faith-Based Board¹:

"In September 2002, when the Initiative hosted the first Governor's Faith-Based and Community Conference, over 500 persons responded to attend with little more than three weeks notice. The advisory group determined that in many instances, it was not 'improper state barriers' as much as a lack of education by both state agencies and faith-based and community providers on how to work cooperatively. Since that time, two important efforts have occurred. First, most state agencies have subsequently identified a lead person to assist faith-based and community providers."

"Recognizing that many grassroots community and faith-based organizations do not have the administrative infrastructure to effectively compete for grants, the Initiative's Intermediary Identification and Evaluation subcommittee formed to seek effective means to help these organizations."

¹ The Faith Based Board, in publishing materials describing its activities, consistently achieves the difficult task of being simultaneously portentuous and vacuous. Extracting actual fact requires an abnormally discerning reader.

"Working with State Agencies – A key part of your [the defendant Bush's] stated goals to this board is to identify improper state barriers to faith-based and community service programs' participation in providing social services. In response we recommend that state government adopt policies to develop practices to track key indicators related to faith-based and community efforts including: number of faith and community groups *funded by state agencies*, best practices, *funding amounts*, and key outcome data...." (Emphasis supplied.)

"We also believe that intermediaries [to facilitate indirect delivery of state funds]– central organizations that can receive government grants and serve as fiscal and administrative agents to smaller sub-grantees – provide an effective mechanism for assisting smaller faith-based and community organizations in providing important social services to Floridians. *We respectfully ask your assistance in helping to establish intermediaries as eligible grant recipients for government grants in the State of Florida.*" (Emphasis supplied.)

"Partnerships with Local Government – We recommend that we work in concert to strengthen our partnerships with local governments, as well as the State, and ask that you assist us in this endeavor by writing to municipal leaders *to encourage them to begin meaningful dialogue and exploration about establishing effective partnerships with faith-based...organizations in their service areas.*" (Emphasis supplied.)

"As stated in our recommendations, we respectfully ask your assistance in helping to establish *intermediaries as eligible grant recipients for government grants in the State of Florida.*" (Emphasis supplied.)

24. The following is a partial list of sectarian institutions that, on information and belief, are receiving funds from the Florida Treasury "directly or indirectly" as a result of the Executive Order and the activities of the Faith-Based Board, which are each described by the defendant WFI as Florida's State-Level Umbrella Faith-Based Organizations:

- Family and Children Faith Coalition of South Florida
- Florida Catholic Conference
- Florida Faith-Based Coalition
- The Salvation Army
- Florida Impact

25. To understand the inherent sectarian nature of these organizations, the aforesaid Florida Impact, for example, lists its Policy Board as being composed as follows:

- African Methodist Episcopal Church
- Florida Association of Jewish Federations
- Christian Church (Disciples of Christ)
- Church Women United in Florida
- The Episcopal Diocese of Florida
- The Episcopal Diocese of Southeast Florida
- Evangelical Lutheran Church of America
- Farmworker Organizations Action Group
- Florida Coalition for the Homeless
- Lutheran Church/Missouri Synod
- Presbyterian Church/Synod of South Atlantic:
 - Central Florida Presbytery
 - Peace River Presbytery

- Tampa Bay Presbytery
- Religious Society of Friends
- SHARE Tampa Bay (United Methodist Church)
- United Church of Christ/Florida Conference:
 - Celebration Mission Council
 - Central Coastal Mission Council
 - Gold Coast Mission Council
 - Southwest Mission Council
 - St. John's Mission Council
- Unitarian Universalist Association
- United Methodist Church/Florida Conference
- United Methodist Church/West Florida Conference
- United Methodist Women

26. The institutions named in paragraph 24 hereof, and identified by the defendant WFI as Florida state-level umbrella Faith-Based organizations, are “pervasively sectarian,” as that term has been used by the United States Supreme Court — in that the secular and sectarian aspects of their programs are “inextricably intertwined,” *Meek v. Pittinger*, 421 U.S. 349, 366 (1975). The relevant programs are operated as part of the ongoing religious missions of the institutions, and they subsidize, or are subsidized by, the churches, synagogues, or mosques of which they are part; offer educational programs that

include religious indoctrination, worship, and the inculcation of religious beliefs; and are designed to advance the religious missions of the sponsoring churches, synagogues, or mosques. They provide their programs in an overtly religious environment in which religious symbols of faith and scripture or religious quotations are prominently displayed or featured. The proselytizing aspects of these programs are not concealed. For example, SHARE Tampa Bay is sponsored by the United Methodist Church. A SHARE Field Representative, Susie Dodson, states that:

“Usually churches are the sponsoring organization for SHARE host sites because outreach is a main part of their purpose.”

Dobson explains what is meant by “outreach” when she describes SHARE as “an excellent outreach ministry.”

27. Each defendant identified in this complaint has acted, whether alone or in concert with, or under the control or direction of one or more other defendants, to effectuate the implementation of the Executive Order, to support its sectarian objectives, and to require all subordinates to engage in parallel conduct -- regardless of any objection based in a well-founded understanding that the Executive Order and the activities pursuant to it are unlawful.

28. Each defendant named in this complaint has been made a party hereto so that the relief requested, if granted, will be plenary and will not be subject to evasion.
29. Substantial amounts have been taken from the revenues of Florida, its agencies, and its political subdivisions and thus from its public treasury and given, directly or indirectly, to the Faith-Based Board, or through the activities of the Faith-Based Board, or of those of the defendant WFI, to monotheistic sectarian organizations. In lieu of a "wall of separation between Church and State," Plaintiffs to some extent have encountered a "wall of secrecy" and have experienced difficulty in precisely deciphering the activities of the defendant Faith-Based Board, or of the defendant WFI, yet Plaintiffs have ascertained many of the basic facts.
30. First, the Faith-Based Board is housed in the Executive Offices of the State of Florida at the Elliot Building in Tallahassee. On information and belief, the Faith-Based Board goes through the charade of paying "rent" to the State of Florida. However, such housing is not actually accomplished without direct or indirect expenditure of revenues from the Florida Treasury. Stated truthfully and simply, such housing is subsidized by the Florida Treasury.
31. Second, on information and belief, the Executive Coordinator of the Faith-Based Board, whose office is located in the Elliot Building, is

either an employee of the State of Florida or is compensated through grants obtained by or through the State of Florida, corporate sponsorships undertaken at the request of the State of Florida, or fees, honoraria, or other donations made to him or to the Faith-Based Board under the State of Florida imprimatur. On information and belief, the Executive Coordinator does receive state funding for travel and a per diem payment for expenses; also on information and belief, the State Auditor has undertaken no audit of him or any activity of the Faith-Based Board, although the State Auditor is expressly authorized to make needed audits under Fla. Stat. Sec. 11.45(3)(d), (e), (f), and (r).

32. It is known from the minutes of April 19, 2005 meeting of the Faith-Based Board that "\$100,000 was include[d] in the Governor's recommended budget to support the office [of the Faith-Based Board]."
33. Third, the defendant WFI, in its own presentation entitled "FLORIDA'S WORKFORCE SYSTEM & LINKAGES/OPPORTUNITES FOR FAITH-BASED & COMMUNITY-BASED ORGANIZATIONS" states that "WFI established and maintains the '[Faith-Based Organization] Gateway' website to advise Florida [Faith Based Organizations] of available services, grants, opportunities and recent developments of mutual interest."
34. Fourth, the defendant WFI states that it is "[c]onverting/transferring the interim '[Faith-Based] Gateway' content to a new website directly

hosted by MyFlorida.com.” WFI describes MyFlorida.com as “the state’s primary internet portal to all state-related information, services, agencies, contacts, etc.”

35. Fifth, the defendant WFI states, it is “[i]nsuring that [Faith-Based Organizations] are linked in with economic development planning and projects, to include employment and other opportunities for clients.”
36. Sixth, the defendant WFI states, “Current federal and state workforce laws encourage state-level and local partnerships with [Faith-Based Organizations] to deliver workforce-related services and *share funds/resources.*, [sic] e.g. State workforce law mandates local MOUs, and proof that at least 15% of workforce youth-training funds are used for after-school tutoring/mentoring/assistance to low-income youth under contract with [Faith-Based Organizations].” (Emphasis supplied.)
37. While Plaintiffs cannot help but be impressed with the numerous devices defendants have used to attempt to evade Florida constitutional law, Plaintiffs assert that the evasions and concealment are no more than a back-alley^e shell game. It doesn’t matter what shell the pea is under, the pea itself is what counts – because, one way or another, the pea itself came from, or was bought by, revenues from Florida’s Treasury.

38. As citizens and taxpayers of Florida, Plaintiffs Richard Hull and Elaine Hull have been and will continue to be injured by the violation of their civil rights through the unconstitutional expenditure of public funds under, or through, the Executive Order and the Faith-Based Board and the related *ultra vires* actions of each defendant named herein. These expenditures of public funds, to which the Hull Plaintiffs have contributed, violate the clear constitutional mandate set forth in Article I, Sec. 3 of the Florida Constitution as well as the Establishment Clause of the First Amendment to the United States Constitution because these expenditures of public funds are not remotely founded in concepts of "religious neutrality." These expenditures are founded instead in a clear and expressed underpinning of religious favoritism giving state sponsored advantage to monotheist religious faith as a distinct and established form of state-sponsored or state-favored religion.
39. In addition to the aforesaid injury that Plaintiffs Richard and Elaine Hull have suffered, such Plaintiffs are threatened by even greater injury by the Faith-Based Board and the defendants because of the accelerating nature of the Board's and the defendants' activities, which are essentially increasing asymmetrically. On this point, to understand the pervasive and ever-expanding nature of the defendants' disregard for the civil rights of Plaintiffs, please see Exhibit D hereto entitled

"Manatee County Faith-Based Grant Writing Workshop." Note also the recent comment of the White House Director of Faith-Based Initiatives:

"Florida is one of the leading laboratories on the faith-based initiative."²

40. Further evidence of Florida's leading status is found in a report entitled *State Funding for Faith-Based Groups on the Rise*. According to its author N. Cook:

"Florida is making a leap in faith-based initiatives, carving out more state and federal money for religious groups..."

Even more telling is the recent comment by the defendant Babson stating on March 20, 2005 that:

"It is not known exactly how much the state [Florida] has given Faith-Based groups. There are a lot of dollars going to Faith-Based...Groups. (Emphasis added.)"³

41. The injuries Plaintiffs have incurred, and are imminently threatened with incurring further, at an ever expanding level of damage, are inherently irreparable and cannot be adequately remedied by any action at law because, *inter alia*, no monetary value can be accurately assessed as a measure of the damage caused by the above-described continuing violation of Plaintiffs' civil rights. No monetary sum can be

² Towey, J., Director of the White House Office of Faith-Based and Community Initiatives, from Brumley, J. "Governor shepherding faith groups into state service," Florida Times Union, March 20, 2005.

³ Tallahassee Democrat, March 20, 2005

ascribed the character of being either adequately or appropriately compensatory.

42. There is a *bona fide* dispute between the Plaintiffs and the defendants as to the constitutionality of the Executive Order and the actions of defendants in support thereof and pursuant thereto. In such dispute, the parties have a present, adverse, and patently antagonistic interest. The facts relevant to this dispute are well-known or are readily ascertainable.

COUNT I

Violation of Article I, Sec. 3. of the Florida Constitution –

Declaratory Judgment

43. Plaintiffs repeat, reiterate, and reallege each of the statements made in paragraphs 1 through 42 hereof as if the same were set forth herein at length.
44. "No revenue of the state or any political subdivision or agency thereof shall ever be taken from the public treasury directly or indirectly in aid of any church, sect, or religious denomination or in aid of any sectarian institution." Article I, Sec. 3, Constitution of the State of Florida.
45. Under the Executive Order, whether directly or indirectly, the defendants are regularly and unlawfully taking or utilizing, or causing to be taken or utilized, Florida "revenues" from the Florida Treasury in complete disregard of the foregoing plain-word prohibition.

Accordingly, the Executive Order and the defendants' actions in support thereof, or in accordance therewith, are a direct, clear, present, and threatened violation of the Florida Constitution.

46. Because the Executive Order is unconstitutional, the Executive Order is void. Because the Executive Order is unconstitutional and thus void, the Executive Order and all actions taken pursuant to it have been void *ab initio*.

WHEREFORE, on this Count I of their complaint, Plaintiffs demand judgment against defendants:

- (1) Declaring that the Executive Order is unconstitutional under the Florida Constitution;
- (2) Declaring that each and all of the defendants, and all persons and entities acting under their direction, control, or in concert with them, in carrying out the Executive Order, are acting without lawful authority;
- (3) Providing appropriate penalties for any person's violation of the Court's order;
- (4) Awarding to Plaintiffs the attorney's fees, expenses, and costs that are incurred in prosecuting this lawsuit; and
- (5) Granting such other relief as the court may deem necessary, just, and proper.

COUNT II

***Violation of Article I, Sec. 3. of the Florida Constitution – Permanent
Injunction***

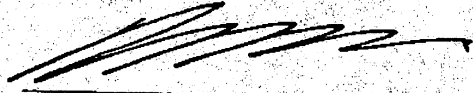
47. Plaintiffs repeat, reiterate, and reallege each of the statements made in paragraphs 1 through 46 hereof as if the same were set forth herein at length.
48. Under the Executive Order, the defendants have paid and, without intervention by the Court, will pay, directly or indirectly, fundamentally unrestricted public funds to sectarian institutions where such funds will be used, directly or indirectly, for religious indoctrination, worship, and the inculcation of religious beliefs, religious education and other religious activities. By expending Florida funds in this manner, defendants are violating the rights of Plaintiffs, and they threaten to continue such violations knowingly and with contumacious disdain for the plain and patently unambiguous language of the Florida Constitution.

WHEREFORE, under this Count II of Plaintiffs' complaint, the Plaintiffs ask the Court:

- (1) To enjoin each and all of the defendants, and all persons and entities acting under their direction, control, or in concert with them, from taking any measures to comply with or further to implement the Executive Order and to cease and desist from any related activities under any guise;

- (2) To provide appropriate penalties for any person's violation of the Court's order;
- (3) To award to Plaintiffs the attorney's fees, expenses, and costs that are incurred in prosecuting this lawsuit; and
- (4) To grant such other and further relief as the court may deem necessary, just, and proper.

Respectfully submitted,



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Attorney for Plaintiffs

Exhibit A

STATE OF FLORIDA

OFFICE OF THE GOVERNOR EXECUTIVE ORDER NO. 04-245

WHEREAS, faith-based and community-based organizations have cared for many of Florida's neediest citizens, and historically have been indispensable in serving Florida's most under privileged children, families and neighborhoods; and

WHEREAS, government cannot be replaced by such faith-based and community-based organizations, but can and should welcome them as partners; and

WHEREAS, there are many opportunities for faith-based and community-based organizations to partner with government entities to deliver services more effectively than either can do alone; and

WHEREAS, these services include, but are not limited to, caring for the elderly, providing educational assistance to Florida's disadvantaged students, curbing crime, addressing homelessness, conquering substance abuse, strengthening families and neighborhoods, and overcoming poverty; and

WHEREAS, many beneficial opportunities may be lost if faith-based and community-based groups are not aware of opportunities to participate with government entities in serving Florida's citizens, or are not equipped to participate on a level playing field, to the full extent permitted by law, in partnering or contracting with government entities for the delivery of services that serve a valid government purpose; and

WHEREAS, many beneficial opportunities may be lost if governmental entities do not make efforts to reach out and share information about opportunities to faith-based and community-based providers and assist new providers in partnering with governmental entities; and

WHEREAS, government may neither advance, nor inhibit religious expression, nor endorse any particular type of religion over non-religion, but must not discriminate against the provision of services by faith-based or community-based providers who are otherwise qualified to provide services; and

WHEREAS, it is beneficial to encourage communication between governmental entities and faith-based and community-based organizations, recognizing that government can do a better job of providing information to, partnering with, learning from and encouraging the best practices of successful faith-based and community-based programs; and

WHEREAS, Volunteer Florida Foundation Inc., ("The Foundation") is the non-profit direct support organization of the Florida Commission on Community Service, and is able to assist in securing training, technical assistance, and other support needed to accomplish the intent and purposes of this executive order.

NOW, THEREFORE, I, JEB BUSH, Governor of the State of Florida, by the powers vested in me by the Constitution and laws of the State of Florida, do hereby promulgate the following Executive Order, effective immediately:

Section 1.

The Governor's Faith-Based and Community Advisory Board ("Board") is hereby created in order to help state government coordinate efforts to utilize and expand opportunities for faith-based and community-based organizations to address social needs in Florida's communities.

Section 2.

The Board shall be composed of up to twenty-five members, all of whom shall be appointed by the Governor. Members shall not receive remuneration for their work. The Governor shall select a chairperson from the membership of the Board. Appointees may include, but shall not be limited to, representatives from various faiths, faith-based organizations, community-based organizations, foundations, corporations, and municipalities. The Governor shall fill any vacancy occurring on the Board. All members shall serve at the pleasure of the Governor.

Section 3.

The Board, working in partnership with the Foundation, shall advise the Governor on policies, priorities, and objectives for the state's comprehensive effort to enlist, equip, enable, empower, and expand the work of faith-based, volunteer and other community organizations to the full extent permitted by law; the duties of the Board are, to the full extent permitted by law, to determine:

(a) How faith-based and community-based organizations can best compete with other organizations for the delivery of state services, regardless of an organization's orientation, whether faith-based or secular;

(b) How best to develop and coordinate activities of faith-based and other community programs and initiatives, enhance such efforts in communities, and seek such resources, legislation and regulatory relief as may be necessary to accomplish these objectives;

(c) How best to identify and promote best practices across state government relating to the delivery of services by faith-based and other community organizations;

(d) How best to coordinate public awareness of faith-based and community nonprofit initiatives, such as demonstration pilots, public-private partnerships, volunteerism, and special projects;

(e) How best to encourage private charitable giving to support faith-based and community initiatives;

(f) How best to bring concerns, ideas, and policy options to the Governor for assisting, strengthening, and replicating successful faith-based and other community programs;

(g) How best to develop and implement strategic initiatives under the Governor's leadership to strengthen the institutions of Florida's families and communities;

(h) How best to showcase and herald innovative grassroots non-profit organizations and civic initiatives;

(i) How best to eliminate unnecessary legislative, regulatory, and other bureaucratic barriers that impede effective faith-based and other community efforts to address social problems;

(j) How best to monitor implementation of the Governor's policy affecting faith-based and other community organizations; and

(k) How best to ensure that the efforts of faith-based and other community organizations meet objective criteria for performance and accountability.

Section 4.

The Board shall, by February 1, 2005, provide to the Governor a written report containing recommended policies, priorities, and objectives for the state's comprehensive effort to enlist, equip, enable, empower, and expand the work of faith-based, volunteer and other community organizations to the full extent permitted by law.

Section 5.

(a) The Board shall be housed administratively within the Executive Office of the Governor.

(b) The Foundation shall work in partnership with the Board in noticing and coordinating all meetings, which shall be open to the public.

(c) Each executive agency is directed, and all other agencies are requested, to render assistance and cooperation to the Board to the full extent permitted by law.

Section 6.

This executive order does not create any right or benefit, substantive or procedural, enforceable at law or equity by any party against the State of Florida, its agencies or instrumentalities, its officers or employees, or any other person.

Section 7.

This executive order shall expire on January 1, 2007, unless extended by amendment.

IN TESTIMONY WHEREOF, I have hereunto set my hand and have caused the Great Seal of the State of Florida to be affixed at Tallahassee, The Capitol, this 15th day of November 2004.

ATTEST:

SECRETARY OF STATE

EXHIBIT B

STATE OF FLORIDA

OFFICE OF THE GOVERNOR EXECUTIVE ORDER NO. 05-24

WHEREAS, On November 18, 2004, Executive Order 04-245 was issued creating the Governor's Faith-Based and Community Advisory Board ("Board") in order to help state government coordinate efforts to utilize and expand opportunities for faith-based and community-based organizations to address social needs in Florida's communities; and

WHEREAS, Executive Order 04-245 required the Board to, by February 1, 2005, provide to the Governor a written report containing recommended policies, priorities, and objectives for the state's comprehensive effort to enlist, equip, enable, empower, and expand the work of faith-based, volunteer and other community organizations to the full extent permitted by law.

NOW, THEREFORE, I, JEB BUSH, Governor of the State of Florida, by the powers vested in me by the Constitution and laws of the State of Florida, do hereby promulgate the following Executive Order, effective immediately:

Section 1.

The due date for the Board's written report as required by Section 4 of Executive Order 04-245 is hereby amended. The Board shall provide the written report by March 1, 2005.

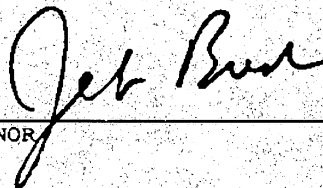
Section 2.

Executive Order 04-245 is hereby incorporated and ratified in all its terms, except as amended herein.

Section 3.

This Executive Order shall expire on January 1, 2007, unless extended by amendment.

IN TESTIMONY WHEREOF, I have hereunto set my hand and have caused the Great Seal of the State of Florida to be affixed at Tallahassee, The Capitol, this 1st day of February 2005.


GOVERNOR

ATTEST:

SECRETARY OF STATE

EXHIBIT C

RECEIVED

MAR 1 2005

Governor's Office

Governor's Faith-Based & Community Initiatives

Governor's Faith-Based & Community Advisory Board

Strengthening Florida's Families through Faith & Community Partnerships

Initial Report & Recommendations

**Per
Executive Order No: 04-245**

A Program of the Volunteer Florida Foundation

401 South Monroe Street • Tallahassee, Florida 32301 • P 850-410-0696 • F 850-921-5146 •
www.volunteerfloridafoundation.org

Governor's Faith-Based & Community Initiative

Governor's Faith-Based & Community Advisory Board
Strengthening Florida's Families through Faith & Community Partnerships

February 28, 2005

Board Members

John Brabson, Chair
Libbie Combee
Andre Estevez
John Fogg
Bill Gay
Saturnino Gonzalez
Raeanne Hance
Steven Hedgren
Jody Hill
Sheila Hopkins
Stephen Jackman
Linda King
Jean LaCour
Robert V. Lee
Thelma Manley
Joy Margolis
Muhammad Musri
Randy Nelson
David Odahowski
Julio Perez
Yvonne Sawyer
Solomon Schiff
Kenneth Scrubbs
Harold Vieux
Arto Woodley

Board Staff

Liza McFadden
President
Volunteer Florida Foundation

Mark Nelson
Coordinator

Mailing Address:
401 South Monroe Street
Tallahassee, Florida 32301

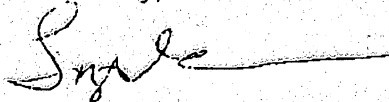
Dear Governor Bush:

As staff to the Governor's Faith-Based and Community Advisory Board, per Executive Order Number 04-245, I am pleased to submit the required annual report, on behalf of Chairman John Brabson.

Per requirements of the Executive Order, this report reviews activities of the board and makes specific recommendations. If you have any questions, please contact Governor's Faith-Based and Community Advisory Board Chairman, Mr. John Brabson, at (b)(6) or via email jbrabson@everestptnrs.com.

We are pleased have this opportunity to work in support of the Governor's Faith-Based and Community Advisory Board.

Sincerely,



Liza McFadden

Cc: John Brabson
Barney Bishop

Board Chair
John Brabson

Board Staff
Liza McFadden
President
Volunteer Florida
Foundation

Mark Nelson
Coordinator
Governor's Faith-
Based & Community
Initiative



Governor's Faith-Based & Community Advisory Board

401 South Monroe Street
Tallahassee, Florida 32301
www.volunteerfloridafoundation.org

(850) 413-0909 (P)
(850) 921-5146 (F)

Strengthening Florida's Families through Faith & Community Partnerships

Board Members

Libbie Combee
Andre Esteves
John Fogg
Bill Gay
Saturnino Gonzalez
Raeanne Hance
Steven Hedgren
Jody Hill
Sheila Hopkins
Stephen Jackman
Linda King
Jean LaCour
Robert V. Lee
Thelma Manley
Joy Margolis
Muhammad Musri
Randy Nelson
David Odahowski
Julio Perez
Yvonne Sawyer
Solomon Schiff
Kenneth Scrubbs
Harold Vieux
Arto Woodley

**Initial Report & Recommendations
Per Executive Order No: 04-245**

We, members of the Governor's newly appointed Faith-Based and Community Advisory Board, submit the following initial report. It reflects our recommendations for this voluntary board's scope of work in the coming year and respectfully outlines activities that you could assist with in helping us reach our mutual goals of working in concert with government to more effectively serve Floridians in need.

Fourteen members of this new board also served in a voluntary capacity for the Governor's Faith-Based and Communities Initiative prior to the November signing of your Executive Order to form this new Advisory Board. Since May 2002, the Initiative worked to strengthen the ability of faith-based and community organizations to work in concert with government in providing Floridians with needed social services. It is on this foundation of work that we present you with recommendations for ongoing and substantive work in the coming year, in cooperation with nonprofit Volunteer Florida Foundation, which will provide administrative support to this board.

Recommendations

1. **Statute** — Because faith-based and community organizations provide effective and cost-efficient services to Floridians in need, this board recommends we work in concert with the State Legislature to build this advisory board and its services into state law, to clearly and effectively establish the framework for its partnership with the State of Florida in perpetuity. We ask for your leadership in this endeavor.
2. **Education** — Recognizing that many faith-based and community service providers need assistance in strengthening their organizations' fiscal and management structures to become competitive in the grant process, we recommend ongoing education seminars as conducted by state agencies in coordination with board leadership. We believe training and education is the best way to meet your goal and we "encourage the good works of faith-based and community organizations and give them the fullest opportunity permitted by law to compete for state funding". Details of the 2002-2004 work follow in this report.
3. **Working with State Agencies** — A key part of your stated goals to this board is to identify improper state barriers to faith-based and community service programs' participation in providing social services. In response we recommend that state government adopt policies to develop practices to track key indicators related to faith-based and community efforts including: number of faith and community groups funded by state agencies, best practices, funding amounts, and key outcome data. Additionally, policies that define issues related to the separation of church and state should be addresses in state grants.

We also believe that intermediaries — central organizations that can receive government grants and serve as fiscal and administrative agents to smaller sub-grantees — provide an effective mechanism for assisting smaller faith-based and community organizations in providing important social services for Floridians. We respectfully ask your assistance in helping to establish intermediaries as eligible grant recipients for government grants in the State of Florida. Further discussion of intermediaries and examples of work in action follow in this report.

4. **Partnerships with Local Government** — We recommend that we work in concert to strengthen our partnerships with local governments, as well as the State, and ask that you assist us in this endeavor by writing to municipal leaders to encourage them to begin meaningful dialogue and exploration about establishing effective partnerships with faith-based and community organizations in their service areas.

Faith-Based and Community Organizations – Background in Florida

The work of faith-based and community organizations in providing crucial social services to Floridians is a time-honored tradition. From adoption services to nursing home care and from domestic violence counseling to aid for the homeless, faith and community-based groups have long been involved with state agencies to provide quality services to Floridians.

These organizations' roles took an important step toward the future in May 2002, during the National Day of Prayer ceremonies in Tallahassee, when you created the Governor's Faith-Based and Community Initiative to explore how these community and faith-based organizations could more effectively work with government organizations, in increasing our collective strength in providing needed services to Floridians. Specifically, this Initiative was tasked with:

- Working to encourage the good works of faith-based and community organizations and giving them the fullest opportunity permitted by law to compete for state funding;
- Identifying improper state barriers to faith-based and community service programs' participation in providing social services;
- Identifying ways to encourage greater corporate and philanthropic support for faith-based and community organizations through public education and outreach activities.

We would like to acknowledge key persons who have assisted the Governor's Faith-Based and Community Initiative with its early research. At its inception, the Initiative conferred with Jim Towey, who is an Assistant to the President and serves as the Director of the nation's Office of Faith-Based and Community Initiatives, as well as with representatives of the federal offices of faith-based and community initiatives to review federal guidelines and procedures and to determine best practices being used in the federal government to assist faith-based and community providers to have equal access to federal funding.

Mr. Towey has also attended three of the four statewide conferences held in the past years to meet with our board, and to provide leadership and guidance on policy and programmatic issues. We realize that a great deal of the drive for this effort came from the recommendation of Florida's Strengthening Families Transition Team. Much of the work of this effort has been tied around how the involvement of faith-based and community groups can assist the state in strengthening Florida families.

Faith-Based and Communities Initiative – 2002/04 Activities

One of the first activities of this new Initiative was to build a strong network of faith-based organizations, community groups, foundations and state leaders. The Initiative relied on the assistance of the nonprofit Volunteer Florida Foundation, which served as an administrative support group to this Initiative's board. A network of individuals and organizations provided the initial outreach leadership to reach organizations across Florida with much needed resources to aid in their service to Florida's needy.

As this group looked at ways to identify improper state barriers to faith-based and community service programs' participation in providing social services and to encourage greater support for faith-based and community organizations through public education and outreach activities, it became apparent that the greatest need was for education and training. In September 2002, when the Initiative hosted the first Governor's Faith-Based and Community Conference, over 500 persons responded to attend with little more than three weeks notice. The advisory group determined that in many instances, it was not "improper state barriers" as much as a lack of education by both state agencies and faith-based and community providers on how to work cooperatively.

Since that time two important efforts have occurred. First, most state agencies have subsequently identified a lead person to assist faith-based and community providers, and second, that the Initiative made educational outreach the highest priority. The Initiative, Volunteer Florida Foundation and participating state agency representatives conducted 36 regional and four statewide trainings, free to participants. These education seminars were specific to capacity-building and grant writing.

We were honored that you attended each of the four statewide trainings:

- September 3-4, 2002 – 1st Annual Faith-Based & Community Conference
Orlando, Florida
- October 3, 2003 – 2nd Annual Faith-Based & Community Conference
Ft. Lauderdale, Florida
- December 5, 2003 – White House Regional Conference
Tampa, Florida
- April 15, 2004 – North Florida Faith-Based & Community Conference
Tallahassee, Florida

Establishment of Subcommittees, 2003

In December 2003, with solid education and communication work achieved, the Initiative identified four specific areas to further its goals, and appointed voluntary leaders to chair four subcommittees. The subcommittees, and their activities in 2004, are:

A. Education & Training

The Education & Training subcommittee, chaired by Yvonne Sawyer of the Family and Children Faith Coalition, was created to discuss the need for outreach efforts around the state. The committee looked at the differing needs in various areas of Florida to develop region-specific trainings. Trainings varied from program/service specific, where a specific state agency representative volunteered to train participants on applying for grants directly relating to his/her state agency, to a grant-writing session, where the Initiative provided a blank Request For Proposal and instructed participants on writing a solid government grant application.

The subcommittee, in collaboration with our state agencies, has suggested this advisory board continue this work by preparing a database of government and non-government RFP descriptions and release dates, so organizations can prepare well in advance when preparing a proposal for a grant. This database could be located on the Volunteer Florida Foundation's website (<http://www.volunteerfloridafoundation.org/>).

Our new Advisory Board plans continuation of this work.

B. Intermediary Identification & Evaluation

Recognizing that many grassroots community and faith-based organizations do not have the administrative infrastructure to effectively compete for grants, the Initiative's Intermediary Identification and Evaluation subcommittee formed to seek effective means to help these organizations. It was co-chaired by Randy Nelson, 21st Century, and David Odahowski, Edyth Bush Charitable Foundation. The subcommittee agreed upon a general definition of an intermediary, and gained board approval. That definition is:

An Intermediary (Lead Partner) is a faith-based or community based organization that helps government offer successful programs and social services to diverse socio-economic and disadvantaged populations including the disabled. It is familiar with both private resources and public programs. Therefore, it can empower faith-based and community-based organizations to serve their communities and, when appropriate, develop synergistic alliances with the responsibility to provide technical and/or fiscal assistance.

From this definition, the subcommittee has been working on identifying a strong network of intermediaries that will be able to address local fiscal and non-fiscal relationships with surrounding grassroots organizations. In doing so, the subcommittee looked at the important work of intermediaries in Florida, such as FreshMinistries in Jacksonville, which serves as a central funder for U.S. Dept. of Labor funding and funding from the City of Jacksonville.

FreshMinistries has built a network of partner organization that is strengthened through the association. By incubating new nonprofit groups and by partnering with existing organizations, FreshMinistries, through its sub-grants and fiscal/administration lead have helped:

- First Baptist Church of Oakland's youth program, which provides the tutors and supervision for 40-plus inner-city youth;
- Create a landmark agreement with Jacksonville's African-American leaders to cooperate on redevelopment plans in a historically African-American neighborhood;
- Jacksonville's economic empowerment zone, providing grants for business owners operating in this economically stressed zone;
- Operation New Hope in its startup phase of launching a job training/housing restoration program;
- 22 nonprofit organizations, to offer Individual Development Accounts to their low-income clients;
- First Timothy Baptist Church to sponsor home ownership and business ownership workshops in the core city;
- Purchase 100 homes and home sites in a blighted area, with the land-banked sites being released to partners such as Habitat for Humanity, Oakland Baptist Church CDC and Operation New Hope for housing restoration and construction.

The intermediary network this Initiative's subcommittee has been working to establish would assist the small organizations willing and able to provide the social service, but incapable of handling the accountability. The Intermediary (Lead Partner) could help community organizations get involved in a variety of ways, including:

- Serve as fiscal/administrative/reporting agent for grants awarded by government or philanthropic entities
- Assist in identifying community needs
- Develop organizational mission and strategy
- Increase capacity to provide services
- Provide technical assistance and training
- Promote partnerships with other service providers
- Recommend best practices

As stated in our recommendations, we respectfully ask your assistance in helping to establish intermediaries as eligible grant recipients for government grants in the State of Florida.

Additionally, it is recommended that state government work to develop practices to track how many faith-based and community groups are funded by agency in order to track best practice, overall funding amounts, and key outcome data.

Our new Advisory Board plans to continue this subcommittee's work. Emphasis of this committee will move to accountability and evaluation as we move from an early emphasis on education and outreach to one of program and accountability.

C. Municipal & Corporate Partnerships

The Municipal & Corporate Partnerships subcommittee was created and was chaired by Arto Woodley, President, Frontline Outreach, to look at the future of partnerships both with municipalities and corporations. This subcommittee will review the leadership set by the city of Miami and Jacksonville. Both cities have launched cooperative programs that are working to decrease crime, increase employment opportunities and improve the lives of the most distressed citizens by working cooperatively with a number of faith-based and community organizations.

Municipalities can be a great asset to grassroots organizations. By providing technical assistance, they can empower these organizations to support already established initiatives. These initiatives, with the assistance of these groups, can aid in the transformation of communities affected by crime, poverty, and lack of educational resources.

The Initiative also looked closely at the effective work being conducted between the City of Miami and faith-based and community groups working there, as well as the work between the City of Jacksonville and its faith-based and community organizations. As stated in our recommendations to you, we respectfully ask that you assist us in opening dialogue in cities across Florida by writing to the mayors of Florida's cities and requesting such activities.

The subcommittee also has been looking at the possibility of corporate collaborations. Corporations have the ability to provide both a fiscal, as well as a non-fiscal relationship. Non-fiscally, corporations can provide a strong mentor relationship that can assist small organizations with the ability to run their organization like a business with strong accounting principles. A survey to corporations to gauge interest in working with faith-based and community organizations has been developed and has been slated for deployment in 2005.

Our new Advisory Board plans to continue this subcommittee's work

D. State Programs: Best Practices

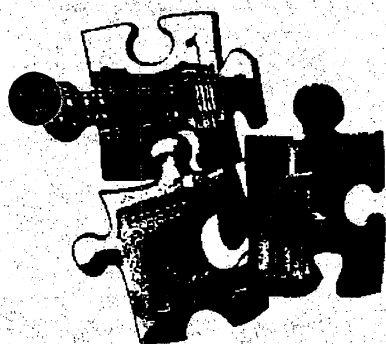
The Best Practices subcommittee, chaired by Bill Gay, Vice President, W.W. Gay Mechanical Contractors, and Linda King, statewide advocate, focused on identifying best practice models (faith-based & community with state/federal government) in the nation to give guidance to Florida's effort. The work of this committee resulted in the recommendation that creating a strong infrastructure for this effort meant that our vision, and focus of work, should be written into statute.

Our new Advisory Board plans to continue this subcommittee's work. In 2005, the work of this committee will continue to focus on supporting legislation that will strengthen this effort in Florida. Additionally the committee will work to identify best practices by faith and community partners.

EXHIBIT D

MCCLASS

Manatee County Community Leaders
Assuring Student Success



Making the
Connections
for Student
Achievement
in Manatee
County

Faith Based & Community Grant Writing Workshop

Wednesday, January 26th, 2005

Hosted at:

**Christ United Methodist Church
5512 26th St West, Bradenton**

Registration 8:00 am - 9:00 am
Coffee & Danish's provided

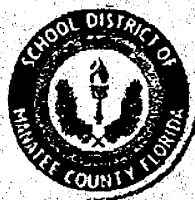
- 9:00 - 12:30: Grant Writing presented by: Mark Nelson from the Governor's Faith-Based & Community Initiative.
- 12:30 - 1:00: Lunch & sharing time of highlights of what is happening with your MCCLASS school connection.
- 1:00 - 3:30 : Work Shop #1: SES Grant (Supplemental Education Services) (Tutoring, etc...) Please pre-view grant application at www.fim.edu/doe/family/ses.htm
- Work shop #2: Mentoring program with the schools and faith-based.

Both workshops will include information on interpreting school data, in order for you to best know how to serve your school's needs.

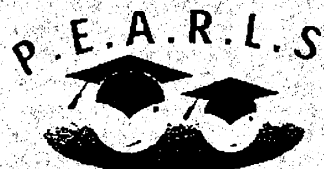
Please RSVP by January 19th. Call Denice at 744-5155 or mail the enclosed form to Manatee Religious Services, 3111 29th Ave East, Bradenton FL 34208-7420



Manatee Religious Services



School District of Manatee County
Title One Schools, Family Involvement Team



PARENT EDUCATION AND
RESOURCE LEARNING SERVICES