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**AMERICAN CIVIL LIBERTIES UNION OF
NEW JERSEY; UNITARIAN UNIVERSALIST
LEGISLATIVE MINISTRY OF NJ; GLORIA
SCHOR ANDERSEN; PENNY POSTEL; and
WILLIAM FLYNN**

Plaintiffs,

v.

**ROCHELLE HENDRICKS, Secretary of
Higher Education for the State of New
Jersey, in her official capacity; and
ANDREW P. SIDAMON-ERISTOFF,
State Treasurer, State of New Jersey, in
his official capacity,**

Defendants.

CIVIL ACTION

**SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, GENERAL
EQUITY PART, MERCER COUNTY**

No. C-82-13

**AMENDED VERIFIED COMPLAINT
FOR INJUNCTIVE AND
DECLARATORY RELIEF**

This is an action seeking to (1) declare unconstitutional specific monetary grants to two higher education institutions that provide sectarian educations and ministerial training, in violation of Article I, Paragraphs 3 and 4, and Article VIII, Section 3, Paragraph 3, of the Constitution of the State of New Jersey, and in violation of the New Jersey Law Against Discrimination; and (2) enjoin the Treasurer of the State of New Jersey and the Secretary of Higher Education from disbursing the disputed funds to those schools.

JURISDICTION AND VENUE

1. This Court has jurisdiction because the action seeks to vindicate rights protected by the laws and Constitution of the State of New Jersey.

2. Venue is proper in the Mercer County Vicinage, pursuant to R. 4:3-2(a), because defendants are located in this county and the events giving rise to the claims herein occurred and will occur within this judicial district.

PLAINTIFFS

3. Plaintiff AMERICAN CIVIL LIBERTIES UNION OF NEW JERSEY (“ACLU-NJ”) is a New Jersey not-for-profit corporation dedicated to preserving constitutional liberties, including ensuring religious freedom by keeping religion free from government involvement, interference, coercion, or favorable or unfavorable treatment. It has its offices in Newark, New Jersey. It sues on behalf of its approximately 15,000 members, most of whom are residents and taxpayers of New Jersey. It has members of various religious affiliations and faiths, as well as members of no affiliation or faith. It has both male and female members. It has members who attend or are employed by public, private non-sectarian, and private religiously-affiliated higher education institutions. It and its members object to the planned grants on many grounds, including because the grants will provide tax funding for the support of religion in general and for the support of religions that many of the members do not subscribe to, because the grants violate the separation of church and state and the state constitutional provisions that guarantee it, and because the

grants will support religious and gender discrimination and will constitute a government-provided benefit which ACLU-NJ's non-Jewish and female members will not be able to access.

4. Plaintiff UNITARIAN UNIVERSALIST LEGISLATIVE MINISTRY OF NJ (“UULMNJ”) represents the interests and principles of the Unitarian Universalist faith, focusing on being a voice for truth, justice and equality in New Jersey public policy. Its mission is to provide the comprehensive structure for New Jersey Unitarian Universalists’ non-partisan activism. It works for a socially just public policy through education, research, advocacy, witness, and service. Included among the Unitarian Universalist principles that UULMNJ seeks to support and promote (as adopted in 1982 by the General Assembly of the Unitarian Universalist Association) are “the constitutional principles of religious liberty, and the separation of church and state that safeguard liberty.” As was urged by the General Assembly’s 1982 Resolution, UULMNJ seeks to protect those principles by, in part, “opposing all forms of direct and indirect public aid to support sectarian private schools.” UULMNJ objects to the planned grants because they will violate the separation of church and state, undermine religious liberty, and support religious ministries.

5. Plaintiff GLORIA SCHOR ANDERSEN is a resident of Voorhees, New Jersey. She pays and will continue to pay income taxes to the State of New Jersey, as well as sales, motor fuel, insurance premium, alcoholic beverage, and telephone service (Emergency Preparedness and 9-1-1 System Assessment) taxes. She has worked as both a public-school and a Hebrew School teacher, and she currently works as a part-time Hebrew tutor. She is Jewish, regularly attends services at a conservative synagogue, and volunteers at the Goodwin Holocaust Museum and Education Center. She is a member and Speaker-at-Large of the Delaware Valley Chapter of Americans United for Separation of Church and State. She objects to the planned grants because

they will direct her tax funds to the support of religion in general, to the support of training in religious doctrines to which she does not subscribe, and to the support of gender discrimination; because the grants represent a stamp of state approval upon particular religious ministries; and because the grants violate the separation of church and state protected by the New Jersey Constitution.

6. Plaintiff PENNY POSTEL is a resident of Cherry Hill, New Jersey. She pays and will continue to pay income taxes to the State of New Jersey, as well as sales, motor fuel, and telephone service (Emergency Preparedness and 9-1-1 System Assessment) taxes. She has been a resident of New Jersey since 1955 and has worked as a public high-school teacher for 27 years. She is a member of Americans United for Separation of Church and State. She objects to the planned grants because they will direct her tax funds to the support of religious ministries and instruction, including training in religious doctrines to which she does not subscribe, and to the support of religious and gender discrimination.

7. Plaintiff WILLIAM FLYNN is a resident of Blackwood, New Jersey. He pays and will continue to pay income taxes to the State of New Jersey, as well as sales, motor fuel, and telephone service (Emergency Preparedness and 9-1-1 System Assessment) taxes. He has been a resident of New Jersey virtually all his life and is employed as an emergency medical technician. He is the founder and president of the Camden County Humanists, a member of the American Humanist Association, and an atheist. He objects to the planned grants because they will direct his tax funds to the support of religious ministries and instruction, violate the separation of church and state, and support religious and gender discrimination.

DEFENDANTS

8. Defendant ROCHELLE HENDRICKS is the Secretary of Higher Education for the State of New Jersey. She was responsible for approving or disapproving grant applications, as well as establishing the amounts of the grants, for the programs that resulted in the two grant awards challenged herein. Her offices are located at NJ Higher Education, 20 West State Street, 4th Floor, Trenton, New Jersey 08608-1206. She is sued in her official capacity.

9. Defendant ANDREW P. SIDAMON-ERISTOFF is the Treasurer for the State of New Jersey. Upon information and belief, Defendant SIDAMON-ERISTOFF is the official responsible for disbursing appropriated funds to named recipients. His offices are at the New Jersey Department of the Treasury, State House, P.O. Box 002, Trenton, New Jersey 08625-0002. He is sued in his official capacity.

FACTS

10. On April 29, 2013, the Office of the Governor announced that Defendant HENDRICKS had sent to the Legislature a list of higher education construction project grants that had been awarded to various public and private New Jersey higher education institutions. *See* Exhibit 1. The list included grants awarded under five separate grant programs: (1) the \$750 million General Obligation construction bond authorization (also referred to as the “Building Our Future Bond Act,” hereinafter referred to as the “Bond Act”); (2) the Higher Education Facilities Trust Fund; (3) the Higher Education Capital Improvement Fund; (4) the Higher Education Technology Infrastructure Fund; and (5) the Higher Education Equipment Leasing Fund.

11. Included on that list of grants were awards to 15 private institutions, including two sectarian institutions whose primary functions are to provide sectarian religious education and to train students for ministry pursuant to tenets of their respective faiths. Specifically, the list

included (1) an award of \$10,635,747 in Bond Act funds for Beth Medrash Govoha yeshiva and (2) an award of \$645,323 in Higher Education Technology Infrastructure Act (“HETIA”) funds for Princeton Theological Seminary.

12. Plaintiffs’ constitutional and statutory rights will be irreparably harmed if the funds to Beth Medrash Govoha and Princeton Theological Seminary described in Paragraph 11 above are disbursed, including because tax payments by Plaintiffs or Plaintiffs’ members will be used to support religious instruction, training, and ministries; because such tax payments will be used to support religious ministries to which Plaintiffs or Plaintiffs’ members do not subscribe; and because the grant funds will support discrimination on the basis of religion and gender. Plaintiffs have no adequate remedy at law.

The Building Our Future Bond Act

13. The Bond Act was approved by New Jersey voters on November 6, 2012. Of the \$750 million authorized to be awarded under the Act, \$52.5 million was designated for grants to private higher education institutions with an endowment of \$1 billion or less, with the rest designated for public universities or county colleges.

14. Defendant HENDRICKS was, and remains, responsible for reviewing applications for funding under the Bond Act, and for approving projects and designating amounts of funding to be awarded. In evaluating the relative value of the grant applications and deciding the amounts awarded, Defendant HENDRICKS and the advisory review committee she established consider, among other factors, numerous broad-based, subjective criteria, and they thus have significant discretion in their decision-making. For example, in evaluating which applications are most qualified to receive funding, Defendant HENDRICKS and the review committee assess relative worth based in significant part on subjective categories such as “Whether it serves the best

interests of higher education in the State as a whole,” “Advancement of student education in the State of New Jersey,” “The cost-effectiveness of the project,” and “Consistency of the project with the State’s goals and priorities for development and redevelopment, including...promotion of access to opportunity for all New Jersey residents.” *See* N.J.A.C. 9A:18-1.6(b). Defendant HENDRICKS reviews recommendations of the review committee but has sole authority to approve or disapprove a project grant and establish the amount of the grant. *Id.*

15. Defendant HENDRICKS approved both of Beth Medrash Govoha’s submitted applications for funding, while other institutions had applications for funding under the Building Our Future Bond Act rejected.

16. Pursuant to *N.J.A.C. 9A:18-1.7(d)*, once the Secretary of Higher Education provides to the presiding officers of each house of the State Legislature a list of projects and amounts of grants she has approved under the Bond Act, the Legislature has 60 days to pass a concurrent resolution disapproving the list; if it fails to do so, the grants will be deemed authorized.

17. The list of projects and grant amounts that includes the grant to Beth Medrash Govoha disputed herein was presented to the Legislature on April 29, 2013. No action to reject the list was taken. The list was therefore approved and authorized as of June 28, 2013, and therefore, absent court-imposed restraints, Defendant SIDAMON-ERISTOFF may at any time disburse the grant funds.

The Higher Education Technology Infrastructure Act

18. Pursuant to N.J.A.C. 9A:13-1.1 to -1.8, Defendant HENDRICKS likewise has authority and discretion to preliminarily approve grant applications and determine amounts of funding pursuant to the Higher Education Technology Infrastructure Act (N.J.S.A. 18A:72A-59 to -61).

19. The subjective criteria for determining which projects are most qualified to receive funds under the Higher Education Technology Infrastructure Act are the same as those considered under the Bond Act, described in Paragraph 14 above.

20. While Princeton Theological Seminary had all three applications for funding under the Higher Education Technology Infrastructure Act approved by Defendant Hendricks, other institutions had applications for such funds rejected.

The \$10,635,747 Grant to Beth Medrash Govoha

21. The \$10,635,747 grant award to Beth Medrash Govoha (also known as “Beth Medrash Govoha of America, Inc.”) is for two projects: \$5,118,000 for a library and research center, and \$5,517,747 for construction of academic space in an already existing building. *See* Higher Education Capital Financing Grant Programs, Certified List of Approved Projects (excerpted), Exhibit 2. Defendant HENDRICKS awarded both of these grants under the Bond Act.

22. Given that the Bond Act designated \$52,500,000 for grants to private higher education institutions, Beth Medrash Govoha was thus awarded over one-fifth of the total \$52,500,000 in funds available for private institutions under the Act, which is more than any other private institution is slated to receive from the Bond Act.

23. Beth Medrash Govoha is an all-male Orthodox Jewish yeshiva located in Lakewood, New Jersey.

24. Beth Medrash Govoha was first incorporated in 1944. Its Certificate of Incorporation sets forth its purposes as follows: “(a) To provide a suitable place of divine worship for its members and others of the Jewish Orthodox faith[;] (b) To advance in every possible manner the religious, social and cultural welfare of its members[;] (c) To conduct a Yeshiva for the higher

education of those of the Jewish faith[; and] (d) To purchase, own and acquire cemetery plots for the burial of the members of the corporation.”

25. In 2000, Beth Medrash Govoha amended its Certificate of Incorporation. It omitted some of the purposes listed in the original Certificate and described its remaining purposes in general terms. It describes its purpose related to its yeshiva as: “to advance the cause of education, generally; to carry on a program for the advanced study of Talmud, in particular[.]”

26. Upon information and belief, Beth Medrash Govoha provides undergraduate and graduate degrees solely to males of the Jewish faith.

27. The State of New Jersey, according to the New Jersey Secretary of Higher Education’s website, describes Beth Medrash Govoha as a “Rabbinical School.” *See*

http://www.nj.gov/highereducation/Program_Inventory/DegreeListings/BethMedrash.htm

(Exhibit 3). The State further identifies Beth Medrash Govoha’s categorization under the Carnegie Classification system as “Special Focus Institutions – Theological seminaries, Bible colleges, and other faith-related institutions,” and notes that Beth Medrash Govoha is accredited by the Association of Advanced Rabbinical and Talmudic Schools. *Id.*

28. The State denotes the courses of study at Beth Medrash Govoha as “Talmudic Studies” and “Rabbinical and Talmudic Studies.” *Id.* The State’s site also sets forth the categorization of the courses of study pursuant to the U.S. Department of Education’s *Classification of Instructional Programs – 2010*. All courses of study at Beth Medrash Govoha yeshiva are classified thereunder as either “Theology/Theological Studies” or “Talmudic Studies.”

“Theology/Theological Studies” is defined as “A program that focuses on the beliefs and doctrine of a particular religious faith *from the intramural point of view of that faith*. Includes instruction in systematic theology, historical theology, moral theology, doctrinal studies,

dogmatics, apologetics, and applications to specific questions of ecclesiastical polity and religious life.” *See*

http://www.nj.gov/highereducation/Program_Inventory/DegreeListings/CIPs.htm#390401

(emphasis added) (Exhibit 4). “Talmudic Studies” is defined as “A program that prepares individuals for advanced Talmudic scholarship and research *and for entry into a program leading to ordination as Rabbis*; students are also qualified to enter conventional graduate and professional schools. Includes instruction in Jewish Law and Jurisprudence, Philosophy, and Ethics, in addition to a major emphasis on Talmud.” *Id.* (emphasis added).

29. The U.S. Department of Education’s Institute of Education Sciences identifies Beth Medrash Govoha as “an institute for advanced Talmudic scholarship. Its primary objective is to produce Talmudic scholars.” Its undergraduate studies program “is designed to provide the student with a thorough foundation in the basic areas of Talmudic knowledge according to the traditional model of Talmudic scholarship.” The graduate studies program “aims to promote advanced Jewish scholarship and research in classical Talmudic and cognate studies. In addition, it is concerned with professional orientation by providing programs to prepare these scholars as teachers and administrators in secondary Torah schools and institutions of higher Talmudic studies, as practicing Rabbis and as experts in Rabbinical jurisprudence.” *See*

<http://nces.ed.gov/collegenavigator/?s=NJ&l=3%2b5&id=183804#accred> (Exhibit 5).

30. The approved grant application by Beth Medrash Govoha (“BMG”) for Bond Act funds for construction of academic space states that “BMG is renowned for its rigorous Talmudic studies program” (BMG Academic Space Grant Application (excerpted) at 23, Exhibit 6); that it is “the college of choice for New Jersey residents seeking a degree in Talmudic studies” (*id.* at 24); that “[s]tudents come to BMG because they know that the breadth and scope of the topics

and levels in Talmudic studies offered at BMG cannot be found anywhere else in the United States” (*id.* at 24); that its mission statement in part provides that it strives to “offer the broadest Talmudic curriculum available in any such institute in the world, providing its students with the opportunity to study almost any area in the widest spectrum of Talmudic studies” (*id.* at 25); and that it “is dedicated to helping its students achieve the highest level of scholarship along with intensive commitment to academic excellence in every area of Talmudic studies” (*id.* at 33).

31. According to 2011 Office of the Secretary of Higher Education records, Beth Medrash Govoha has 79 faculty members, all of whom are male. *See*

<http://www.state.nj.us/highereducation/statistics/FacultyRaceSex2011.pdf> (Exhibit 7).

32. Office of the Secretary of Higher Education records confirm that Beth Medrash Govoha’s entire student body is also all-male. *See*

<http://www.state.nj.us/highereducation/statistics/Enr2012Sex.pdf> (Exhibit 8). Its 2012 enrollment is 2,696 students in its undergraduate program, all of whom are male (*id.*); its graduate studies program has 3,842 students, all of whom are male. *Id.*

33. Additionally, the U.S. Department of Education’s Institute of Education Sciences confirms Beth Medrash Govoha is an institution that is “Single sex: Men.” *See*

<http://nces.ed.gov/collegenavigator/?s=NJ&l=3%2b5&id=183804#accred> (Exhibit 5).

34. Further, while the Office of the Secretary of Higher Education does not disclose on its website the religious composition of institutes of higher education, it does disclose racial and ethnic composition. The Secretary of Higher Education’s records confirm that, in 2012, Beth Medrash Govoha’s entire undergraduate student body was white (96%) or non-resident alien (4%). *See* <http://www.state.nj.us/highereducation/statistics/Enr2012Race.pdf> (Exhibit 9). None

of the 2,696 undergraduate students were Black, Hispanic, Asian, Native American, Pacific Islander, or of multiple races. *Id.*

35. Beth Medrash Govoha's approved grant applications for Bond Act funds confirm that the grants will serve the institution's mission of providing theological education and training. The application for \$5,517,747 for construction of academic space reveals, among other facts, the following: "the project will significantly increase the capacity of BMG's academic programs" (BMG Academic Space Grant Application (excerpted) at 1, Ex. 6); the new facilities will include fourteen new classrooms, four new study halls, new faculty offices, a new library, and a computer workroom (*id.* at 5, 20); "[t]he proposed project will serve students at all levels of BMG's programs, including Undergraduates, Graduate Students, and Advanced Talmudic Fellows" (*id.* at 9, 33-34); the project "will increase the total student capacity of BMG's academic space by 1,130 students" (*id.* at 10); "100% of the gross square footage" of the academic space supported by the project "will be devoted to direct academic use or to facilities supporting the Academic Use" (*id.* at 23); and "[t]he proposed project also promotes *Innovation*, in setting new trends for tradition-steeped Talmudic studies programs" (*id.* at 32). The application for \$5,118,000 for Construction of Library and Research Center reveals, among other facts, the following: the project will "expand the academic capacity of the Institution" (BMG Library and Research Center Grant Application (excerpted) at 1, Exhibit 10); it "will significantly increase the capacity of BMG's academic programs and allow the Institution to offer increased access to its extensive research collections" (*id.*); the third floor of the building will contain "faculty and student meeting rooms, faculty offices, BMG's Department of Hebrew Studies and Student Writing Resource Center, the Department of Adult and Continuing Education, student internship advisors, BMG's Student Pathways to Success Advisement

Program, workrooms for Graduate Students and Academic Fellows, and larger rooms devoted to scholarly research and writing projects connected with the library” (*id.* at 6-7); the funding “is expected to decrease overall operating costs to the Institution” (*id.* at 10); it will “enabl[e] BMG to sustain and grow its academic program” (*id.* at 27); it will “provid[e] the infrastructure necessary for BMG to accommodate additional growth in enrollment” (*id.* at 29); the new library will make available “thousands of resources and texts in digital databases to directly support the academic research of Talmudic studies students at all levels of BMG’s programs” (*id.* at 32); the “proposed Library and Research Center also promotes Innovation, in setting new trends for tradition-steeped Talmudic studies programs” (*id.* at 37); the project “brings the Talmudic-studies program apace with technological advancements and academe’s increasing reliance on digital resources, while still ensuring that a full complement of traditional research texts is available” (*id.* at 38); and it will “provide the proper research materials, texts, and access to digital archives to support and advance the education of Undergraduates and Graduate students and Advanced Talmudic Fellows” (*id.*).

The \$645,323 Grant to Princeton Theological Seminary

36. The \$645,323 grant awarded to Princeton Theological Seminary was for three projects: \$241,722 for “IT infrastructure upgrade for library for expanded historical and theological research...,” \$113,712 for “Learning Spaces: Training Room,” and \$289,889 for “Revamped Cooper Conference Room.” All awards were from Higher Education Technology Infrastructure Act funds. *See* Exhibit 2.

37. Princeton Theological Seminary is a Presbyterian Christian seminary located in Princeton, New Jersey.

38. According to its website, Princeton Theological Seminary’s mission is as follows:

Mission Statement

Princeton Theological Seminary prepares women and men to serve Jesus Christ in ministries marked by faith, integrity, scholarship, competence, compassion, and joy, equipping them for leadership worldwide in congregations and the larger church, in classrooms and the academy, and in the public arena.

A professional and graduate school of the Presbyterian Church (U.S.A.), the Seminary stands within the Reformed tradition, affirming the sovereignty of the triune God over all creation, the Gospel of Jesus Christ as God's saving word for all people, the renewing power of the word and Spirit in all of life, and the unity of Christ's servant church throughout the world. This tradition shapes the instruction, research, practical training, and continuing education provided by the Seminary, as well as the theological scholarship it promotes.

In response to Christ's call for the unity of the church, the Seminary embraces in its life and work a rich racial and ethnic diversity and the breadth of communions represented in the worldwide church. In response to the transforming work of the Holy Spirit, the Seminary offers its theological scholarship in service to God's renewal of the church's life and mission. In response to God's sovereign claim over all creation, the Seminary seeks to engage Christian faith with intellectual, political, and economic life in pursuit of truth, justice, compassion, and peace.

To these ends, the Seminary provides a residential community of worship and learning where a sense of calling is tested and defined, where Scripture and the Christian tradition are appropriated critically, where faith and intellect mature and life-long friendships begin, and where habits of discipleship are so nourished that members of the community may learn to proclaim with conviction, courage, wisdom, and love the good news that Jesus Christ is Lord.

Adopted by the Board of Trustees, May 1996

See http://www.ptsem.edu/index.aspx?menu1_id=2030&menu2_id=2031&id=1237 (Exhibit 11).

39. Princeton Theological Seminary's approved applications for Higher Education Technology Infrastructure Act funding confirm that the grants will serve the institution's mission of providing theological education and training. In its application for Higher Education Technology Infrastructure Act funding for a Revamped Cooper Conference Room, Princeton Theological Seminary acknowledges that it is a "denominational school" (PTS Grant Application for Revamped Cooper Conference Room (excerpted) at 1, Exhibit 12) and its "mission is the

preparation of men and women for theological leadership.” *Id.* at 4. The funding awarded for the Revamped Cooper Conference Room would benefit the institution’s School of Christian Vocation and Mission (SCVM). *Id.* at 1. Princeton Theological Seminary describes SCVM as striving “to cultivate more informed people of faith, who are also equipped with the mindset, mentors, and practical skills needed to lead congregations, nonprofit organizations and community groups in the 21st Century.” *Id.*

40. Similarly, in its application for Higher Education Technology Infrastructure Act funding for a new training room, Princeton Theological Seminary acknowledges that it provides “graduate theological education” (PTS Grant Application for Learning Spaces (excerpted) at 1, Exhibit 13); that it “educates men and women of the State of New Jersey for traditional church leadership” (*id.* at 1); and that it is “accredited by the Association of Theological Schools” (*id.* at 1). The grant application states that the new training room “will have an immediate impact on training at the Seminary from an academic perspective” (*id.* at 13); that the training room will aid the endeavors of both students and faculty (*id.* at 15); that the project “will multiply the impact of the Seminary’s mission” of “the preparation of men and women for theological leadership” (*id.* at 25); that the project “will allow Princeton Seminary to continue as a leader in theological education” (*id.* at 28); “that the [p]roposed project is essential to the Seminary’s education mission” of “the preparation of men and women for ministry to congregations and for Christian leadership in communities and professional environments” (*id.* at 31); and that the project “mirrors the guiding principles established in the technology plan . . . which articulates the need to prepare men and women, in accordance with the Seminary’s stated mission, for all the many forms and vocations in ministry, in service to the church and the world” (*id.* at 32).

41. In its application for funding for “Enhanced IT Infrastructure for Renovated Luce Library,” Princeton Theological Seminary reiterates that its mission “is the preparation of men and women for theological leadership” (PTS Grant Application for Luce Library (excerpted) at 3, Exhibit 14) and notes that the funds sought in this particular application would enable the Seminary “to advance its ‘digital’ reach to the next level, able to offer its unparalleled resources for historical and theological research and reference to a vastly broader community....” (*id.* at 2). It further notes that, “[b]y strengthening our converged technologies, the Seminary is better able to fulfill its core mission....” *Id.* at 6. It describes one of the projects that would be advanced by the funding as being “based on the premise that to truly understand Biblical texts, the reader must also grasp the historical setting....The ultimate objective is ‘to revolutionize the visual display of the biblical world.’” *Id.* at 31.

42. The State of New Jersey, according to the New Jersey Secretary of Higher Education’s website, describes Princeton Theological Seminary as a “Theological Institution.” *See* http://www.nj.gov/highereducation/Program_Inventory/DegreeListings/Princeton_S.htm (Exhibit 15). The State further identifies Princeton Theological Seminary’s categorization under the Carnegie Classification system as “Special Focus Institutions – Theological seminaries, Bible colleges, and other faith-related institutions,” and notes that the Seminary is accredited by the Middle States Association of Colleges and Schools & Association of Theological Schools. *Id.*

43. The State also describes the courses of study at Princeton Theological Seminary as “Christian Education,” “Theological Professions” and “Theology – First Professional.” *Id.* The State’s site also sets forth the categorization of the courses of study pursuant to the U.S. Department of Education’s *Classification of Instructional Programs – 2010*. All courses of study at Princeton Theological Seminary are classified as either “Religious Education,”

“Theology/Theological Studies” or “Divinity/Ministry.” “Religious Education” is defined as “A program that focuses on the theory and practice of providing educational services to members of faith communities, *within the context of a particular religion, and that prepares individuals to serve as religious educators....*”

http://www.nj.gov/highereducation/Program_Inventory/DegreeListings/CIPs.htm#390401

(emphasis added) (Exhibit 4). “Divinity/Ministry” is defined as “*A program that prepares individuals for ordination as ministers or priests in any of the Christian religious traditions.*

Includes instruction in the theology and polity of a particular church, church law, liturgy and ritual, principles of pastoral ministry, homiletics, evangelism, church/parish organization and management, Christian ethics, church history, and related studies.” *Id.* (emphasis added).

“Theology/Theological Studies,” as noted in Paragraph 28 above, is defined as “A program that focuses on the beliefs and doctrine of a particular religious faith *from the intramural point of view of that faith.* Includes instruction in systematic theology, historical theology, moral theology, doctrinal studies, dogmatics, apologetics, and applications to specific questions of ecclesiastical polity and religious life.” *Id.* (emphasis added).

**FIRST CAUSE OF ACTION
VIOLATION OF ARTICLE I, PARAGRAPH 3
OF THE NEW JERSEY CONSTITUTION**

44. Plaintiffs incorporate by reference paragraphs 1 through 43 as if fully set forth herein.

45. Article I, Paragraph 3 of the New Jersey Constitution states, in pertinent part: “nor shall any person be obliged to pay tithes, taxes, or other rates for building or repairing any church or churches, place or places of worship, or for the maintenance of any minister or ministry, contrary to what he believes to be right or has deliberately and voluntarily engaged to perform.”

46. Article I, Paragraph 3 of the New Jersey Constitution forbids any taxpayer funds, including funds appropriated through the Bond Act or the Higher Education Technology Infrastructure Act, to be provided to “any church or churches, place or places of worship, or for the maintenance of any minister or ministry.”

47. Because Beth Medrash Govoha and Princeton Theological Seminary provide sectarian religious instruction, because they provide a place for sectarian religious study and religious activity, and because each prepares students for the ministry of a particular sect, the awards of taxpayer funds to Beth Medrash Govoha and Princeton Theological Seminary violate the prohibition on utilizing public tax money for a “church or churches, place or places of worship, or for the maintenance of any minister or ministry.”

48. By awarding and imminently intending to provide taxpayer funds to Beth Medrash Govoha and Princeton Theological Seminary, Defendants have violated or are threatening to imminently violate Article 1, Paragraph 3 of the New Jersey Constitution.

**SECOND CAUSE OF ACTION
VIOLATION OF THE LAW AGAINST DISCRIMINATION, N.J.S.A. 10:5-1 ET SEQ.**

49. Plaintiffs incorporate by reference paragraphs 1 through 48 as if fully set forth herein.

50. The Law Against Discrimination (hereinafter “LAD”) prohibits “public accommodations” as defined therein from discriminating in hiring or in the provision of services based on “race, creed, color, national origin, ancestry, age, marital status, civil union status, domestic partnership status, affectional or sexual orientation, genetic information, sex, gender identity or expression, disability or atypical hereditary cellular or blood trait of any individual, or because of the liability for service in the Armed Forces of the United States or the nationality of any individual....”

51. Education facilities “operated or maintained by a bona fide religious or sectarian institution” are specifically excluded from the definition of “public accommodation” and, therefore, such organizations are not prohibited by the LAD from discriminating in employment or in the provision of services.

52. However, the State of New Jersey and its agencies are “public accommodations” as defined in the Act. As such, they are prohibited from discriminating in hiring or in the provision of services.

53. Public accommodations such as the State of New Jersey and its agencies are also prohibited by the LAD from providing sponsorship of, or conferring of special benefits on, an organization that engages in discrimination.

54. By awarding and imminently intending to provide more than ten million dollars of Bond Act funds to an organization (Beth Medrash Govoha) that discriminates on the bases of creed and sex, Defendants have violated or are threatening to imminently violate the Law Against Discrimination.

**THIRD CAUSE OF ACTION
VIOLATION OF ARTICLE I, PARAGRAPH 4
OF THE NEW JERSEY CONSTITUTION**

55. Plaintiffs incorporate by reference paragraphs 1 through 54 as if fully set forth herein.

56. Article I, Paragraph 4 of the New Jersey Constitution states, in pertinent part: “There shall be no establishment of one religious sect in preference to another.”

57. By awarding and imminently intending to provide public funding to institutions (specifically, Beth Medrash Govoha and the Princeton Theological Seminary) that provide sectarian educations and train students for the ministry of their respective religious sects,

Defendants have violated or are threatening to imminently violate Article I, Paragraph 4 of the New Jersey Constitution.

**FOURTH CAUSE OF ACTION
VIOLATION OF ARTICLE VIII, SECTION 3, PARAGRAPH 3
OF THE NEW JERSEY CONSTITUTION**

58. Plaintiffs incorporate by reference Paragraphs 1 through 57 as if fully set forth herein.

59. Article VIII, Section 3, Paragraph 3 of the New Jersey Constitution precludes the use of taxpayer dollars “for the use of any society, association or corporation.”

60. Article VIII, Section 3, Paragraph 3 requires grants of public funds to serve a public purpose, in that they must benefit the community as a whole and be directly related to functions of government.

61. By awarding and imminently intending to provide public funding to institutions that primarily train ministers of and provide instruction in selected faiths, including one institution that only admits males of the Jewish faith, Defendants have violated or are threatening to imminently violate Article VIII, Section 3, Paragraph 3 of the New Jersey Constitution through the expenditure of public funds on private, not public, purposes.

REQUEST FOR RELIEF

62. WHEREFORE, Plaintiffs request that this Court:

- (a) Declare that the award of the above-described grants under the Bond Act and HETIA to Beth Medrash Govoha and the Princeton Theological Seminary violates Article I, Paragraphs 3 and 4, and Article VIII, Section 3, Paragraph 3 of the New Jersey Constitution, and violates the New Jersey Law Against Discrimination;

- (b) Enjoin, preliminarily and permanently thereafter, Defendants, their employees, agents and assigns, from issuing any check or otherwise providing the above-described grant funding under the Bond Act and HETIA to Beth Medrash Govoha or the Princeton Theological Seminary;
- (c) Award Plaintiffs costs and attorneys' fees pursuant to the New Jersey Law Against Discrimination; and
- (d) Grant such other relief as the Court deems just and appropriate.



EDWARD BAROCAS
AMERICAN CIVIL LIBERTIES UNION OF
NEW JERSEY FOUNDATION
P.O. Box 32159
Newark, New Jersey 07102

Attorney for Plaintiff

Date: Dec. 10, 2013

NO JURY DEMAND

Plaintiffs do not demand trial by jury in this action.

DESIGNATION OF TRIAL COUNSEL

Plaintiffs designate Edward L. Barocas as trial counsel.

Dated: Dec. 10, 2013



Edward L. Barocas, Legal Director
ACLU-NJ Foundation
P.O. Box 32159
Newark, NJ 07102

CERTIFICATION PURSUANT TO R. 4:5-1

Plaintiffs, via counsel, hereby certify that there are no other proceedings or pending related cases arising from the same factual dispute described herein. The matter in controversy is not the subject of any other action pending in any other court or a pending arbitration proceeding, and no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, the undersigned knows of no other parties that should be made a part of this lawsuit. In addition, the undersigned recognizes the continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: *Dec 10, 2013*

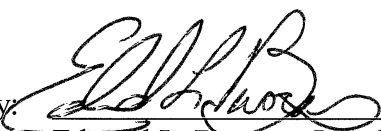
By: 
Edward L. Barocas, Legal Director
ACLU-NJ Foundation
P.O. Box 32159
Newark, NJ 07102
973-854-1717
ebarocas@aclu-nj.org

EXHIBIT 1



STATE OF NEW JERSEY OFFICE OF THE GOVERNOR

**Governor Christie Announces \$1.3 Billion for Higher Education Construction,
Putting Thousands to Work and Improving Facilities for 350,000 Students**
*176 Projects Sent to Legislature For First Statewide, Voter-Approved Higher Education and
Other State-Led Capital Construction in 25 Years*

For Immediate Release
Monday, April 29, 2013

Contact: Michael Drewniak
Colin Reed
609-777-2600

Trenton, NJ – Moving forward to ensure the future of higher education in the Garden State, Governor Christie today announced that Secretary of Higher Education Rochelle Hendricks has sent the Legislature a list of 176 higher education capital construction projects, the first concerted contribution to New Jersey's higher education infrastructure in decades. The projects, many of which are shovel-ready, include cutting edge research laboratories, the latest computerized classrooms, and cyber networks that will allow students and faculty to interact with colleagues around the world through long-overdue construction, maintenance and attention to the State's higher education community.

"Today, we begin a new era of opportunity for New Jersey's colleges and universities," Governor Christie said. "To keep more of our best students in the State and to make our colleges more attractive research partners for industries looking to bring good paying jobs and businesses here, we need modern facilities to remain competitive."

Last August, the Governor signed legislation placing a \$750 million General Obligation construction bond question on the ballot. Voters approved the bond authorization in November and Secretary Hendricks took swift action and proposed regulations in December. In addition, Secretary Hendricks announced that the State would also be making available bond proceeds from the reauthorization of four other higher education funding programs – the Higher Education Capital Improvement Fund (CIF); the Higher Education Facilities Trust Fund (HEFT); the Higher Education Technology Infrastructure Fund (HETI); and the Higher Education Equipment Leasing Fund (ELF). The combined capacity of these programs is more than \$1.3 billion. During the process, Secretary Hendricks sent out a solicitation package and hosted an information session in February, and by March 25, 2013, colleges and universities submitted more than 250 applications for funding.

A team of experts from the Educational Facilities Authority, the Economic Development Authority, the Schools Development Authority and the Department of Treasury reviewed and recommended the approval of projects to Secretary Hendricks, who then compiled the list that best reflects the State's higher education goals and priorities. Selected projects targeted academic programs, especially science, technology, engineering and math. Institutions were required to detail how projects served students and aligned with New Jersey's workforce needs.

"Our team looked for innovative projects that were in line with the missions of the colleges and New Jersey's needs. I'm proud that higher education institutions in every region of our state will benefit," Secretary Hendricks said. "We had 46 institutions submit applications for \$2.1 billion in funding, and I want to commend the higher education community for the impressive quality of the applications."

The full list of projects transmitted to the Legislature for consideration is attached and a breakdown of proposed awards by institution is below:

**HIGHER EDUCATION CAPITAL
FINANCING GRANT PROGRAMS**
(by institution type)

New Jersey Institute of Technology	\$99,842,923
Rowan University	\$117,813,926
Rutgers University <i>(all campuses)</i>	\$357,231,074
UMDNJ	\$67,030,705

Kean University	\$53,812,500
Montclair State University	\$93,812,912
New Jersey City University	\$34,585,004
Ramapo College of New Jersey	\$18,598,000
Richard Stockton College of NJ	\$53,957,950
The College of New Jersey	\$57,450,035
Thomas Edison State College	\$16,621,000
William Paterson University	\$31,983,521

Beth Medrash Govoha	\$10,635,747
Bloomfield College	\$2,517,500
Caldwell College	\$3,846,182
Centenary College	\$2,267,000
Drew University	\$6,811,109
Fairleigh Dickinson University	\$10,160,188
Felician College	\$4,375,000
Georgian Court University	\$8,439,985
Princeton Theological Seminary	\$645,323
Princeton University	\$6,452,500
Rider University	\$4,555,000
Saint Peter's University	\$2,766,000
Seton Hall University	\$11,713,532
Stevens Institute of Technology	\$7,250,000
The College of Saint Elizabeth	\$2,391,888

Atlantic Cape Community College	\$8,211,657
Bergen Community College	\$15,844,000
Brookdale Community College	\$15,884,865
Burlington Community College	\$4,573,881
Camden County College	\$8,313,296
County College of Morris	\$10,437,512
Cumberland County College	\$2,492,400

Essex County College	\$19,103,490
Gloucester County College	\$19,008,315
Hudson County Community College	\$11,615,985
Mercer County Community College	\$9,697,050
Middlesex County College	\$14,810,400
Ocean County College	\$12,510,572
Passaic County Community College	\$6,111,199
Raritan Valley Community College	\$16,418,794
Salem Community College	\$3,000,000
Sussex County Community College	\$2,331,600
Union County College	\$1,405,848
Warren County Community College	\$917,000

EXHIBIT 2

Higher Education Capital Financing Grant Programs
 Certified List of Approved Projects - Spring 2013 Cycle

Private Institutions

	GO	CIF	HEFT	HETI	ELF	TOTAL
BETH MEDRASH GOVOHA 006-01 Construction of Library and Research Center Construct new library/research ctr.; locate certain academic depts. on 3rd floor, incl.: writing resource ctr., Hebrew Studies, Adult and Continuing Ed., internship advisors, career and academic counseling.	5,118,000					5,118,000
006-02 Princeton Avenue Academic Center Construction of Academic Space Construct academic space through reconfigure of existing bldg. to incl.: 14 classrooms, ref. library, computer room, faculty offices and academic support space.	5,517,747					5,517,747

Higher Education Capital Financing Grant Programs
 Certified List of Approved Projects - Spring 2013 Cycle

Private Institutions

	GO	CIF	HEFT	HETI	ELF	TOTAL
PRINCETON THEOLOGICAL SEMINARY						
038-01 Enhanced IT Infrastructure for Renovated Luce Library IT infrastructure upgrade for library for expanded historical and theological research incl.: creation of digital access; upgrade of underlying communications infrastructure; a redundant, diverse-pathway fiber backbone to the network; and extension of reach of fiber optic network.				241,722		241,722
038-02 Learning Spaces: Training Room Acquisition and installation of technology in a space to allow on-site and distance training to students and staff.				113,712		113,712
038-03 Revamped Cooper Conference Room Equipping the Cooper Conference Room with 21st century multimedia functionality to expand online education and strengthen its interaction with other universities and learning communities. PTS will continue existing online programs and transition its Spanish and Portuguese Certificate programs to online.				289,889		289,889

EXHIBIT 3

[home](#) > [program inventory](#) > [degreelistings](#) > bethmedrash

Beth Medrash Govoha - Rabbinical School

Accredited by: Association of Advanced Rabbinical and Talmudic Schools

Carnegie Classification: Special Focus Institutions--Theological seminaries, Bible colleges, and other faith-related institutions

Clicking on a CIP code will open another window with the description of a program assigned that code from the U.S. Department of Education's *Classification of Instructional Programs - 2010*.

<u>Degree Level</u>	<u>Degree</u>	<u>Program</u>	<u>CIP</u>
Bachelor's	B.T.S.	Talmudic Studies	390606
Master's	M.R.T.S.	Rabbinic & Talmudic Studies	390601
Prof. Post-Doc.	Grad.Cert.	Advanced Graduate Talmudic Diploma	390606
	Grad.Cert.	Graduate Talmudic Diploma	390606

Source: NJ Higher Education Degree Program Inventory, 5/7/2013 10:20:45 AM

EXHIBIT 4

380206 Jewish/Judaic Studies

A program that focuses on the history, culture, and religion of the Jewish people Includes instruction in Jewish religious heritage, sacred texts, and law; Jewish philosophy and intellectual history; Jewish life and culture, both in Israel and the Jewish Diaspora; historical Jewish minority cultures such as the Yiddish, Sephardic, and other; anti-Semitism, gentile relations and Shoa; Zionism; and modern developments within Judaism

[Close Window](#)

380299 Religion/Religious Studies, Other

Any instructional program in religion/religious studies not listed above

[Close Window](#)

389999 Philosophy and Religious Studies, Other

Any instructional program in philosophy and religion not listed above

[Close Window](#)

390201 Bible/Biblical Studies

A program that focuses on the Christian and/or Jewish Bible and related literature, with an emphasis on understanding and interpreting the theological, doctrinal, and ethical messages contained therein May include preparation for applying these studies in various religious vocations

[Close Window](#)

390301 Missions/Missionary Studies and Missiology

A program that focuses on the theory and practice of religious outreach, social service and proselytization, and that prepares individuals for mission vocations Includes instruction in theology, evangelism, preaching, medical and social mission work, missionary education, missionary aviation, emergency services, legal and political aspects of working in other countries, and preparation for ordination as missionaries

[Close Window](#)

390401 Religious Education

A program that focuses on the theory and practice of providing educational services to members of faith communities, within the context of a particular religion, and that prepares individuals to serve as religious educators Includes instruction in planning and teaching lessons, organizing and supervising instructional activities, designing and developing instructional materials, and administering religious education programs and facilities

[Close Window](#)

390501 Religious/Sacred Music

A program that focuses on the history, theory, composition, and performance of music for religious or sacred purposes, and that prepares individuals for religious musical vocations such as choir directors, cantors, organists, and chanters

[Close Window](#)

390601 Theology/Theological Studies

A program that focuses on the beliefs and doctrine of a particular religious faith from the intramural point of view of that faith Includes instruction in systematic theology, historical theology, moral theology, doctrinal studies, dogmatics, apologetics, and applications to specific questions of ecclesiastical polity and religious life

[Close Window](#)

390602 Divinity/Ministry

A program that prepares individuals for ordination as ministers or priests in any of the Christian religious traditions Includes instruction in the theology and polity of a particular church, church law, liturgy and ritual, principles of pastoral ministry, homiletics, evangelism, church/parish organization and management, Christian ethics, church history, and related studies

[Close Window](#)

390604 Pre-Theology/Pre-Ministerial Studies

A program that prepares individuals to enter a seminary or other program leading to religious ordination, or a related religious vocation

[Close Window](#)

390605 Rabbinical Studies

A program that prepares individuals for ordination as Rabbis Includes instruction in Talmud, Halacha, Liturgy and Rituals, Rabbinical Thought, Jewish Ethics, Jewish Education, Pastoral Counseling and Homiletics

[Close Window](#)

390606 Talmudic Studies

A program that prepares individuals for advanced Talmudic scholarship and research and for entry into a program leading to ordination as Rabbis; students are also qualified to enter conventional graduate and professional schools Includes instruction in Jewish Law and Jurisprudence, Philosophy, and Ethics, in addition to a major emphasis on Talmud

[Close Window](#)

390699 Theological and Ministerial Studies, Other

Any instructional program in theological and ministerial studies not listed above, including preparation for religious vocations in faiths other than Christianity and Judaism

Close Window

390701 Pastoral Studies/Counseling

A program that focuses on the theory and principles of pastoral care and prepares ordained clergy to provide non-clinical pastoral counseling to individuals and groups Includes instruction in pastoral leadership, counseling psychology; crisis intervention; individual and group procedures; theological and spiritual counseling; pastoral care; and applications to specific types of ministry

Close Window

390702 Youth Ministry

A program that prepares the ordained clergy and other religious professionals to provide spiritual, counseling, and leadership services to children, adolescents, and young adults Includes instruction in child and adolescent psychology, human growth and development, family studies, communication skills, religious education, youth counseling, small group leadership, planning and organizing youth activities, volunteer supervision, and youth evangelism and worship

Close Window

390703 Urban Ministry

A program that prepares the ordained clergy and other religious professionals to provide spiritual, counseling, and leadership services to individuals and groups in urban communities Includes instruction in bible study and theology, pastoral leadership and care, urban structure and context, inner city ministry, counseling ministries, family studies, homiletics, social ethics, and community organizing

Close Window

390704 Women's Ministry

A program that prepares non-ordained women to provide spiritual, counseling, and leadership services to other women in local churches, parachurch organizations, and other settings Includes instruction in foundations of women's ministry, women's ministry in the local church, spiritual formation, women's evangelism and discipleship, bible study and theology, homiletics, lay counseling, women's issues, and leadership training

Close Window

390705 Lay Ministry

A program that prepares non-ordained individuals to serve as lay pastors, religious educators, youth leaders, and other professional positions open to the laity in local churches and other settings Includes instruction in bible studies, theology, spirituality, pastoral counseling, foundations of ministry, effective communication, and church leadership

Close Window

390799 Pastoral Counseling and Specialized Ministries, Other

Any instructional program in pastoral counseling and specialized ministries not listed above

Close Window

399999 Theology and Religious Vocations, Other

Any instructional program in theological studies and religious vocations not listed above

Close Window

400101 Physical Sciences

A program that focuses on the major topics, concepts, processes, and interrelationships of physical phenomena as studied in any combination of physical science disciplines

Close Window

400201 Astronomy

A general program that focuses on the planetary, galactic, and stellar phenomena occurring in outer space Includes instruction in celestial mechanics, cosmology, stellar physics, galactic evolution, quasars, stellar distribution and motion, interstellar medium, atomic and molecular constituents of astronomical phenomena, planetary science, solar system evolution, and specific methodologies such as optical astronomy, radioastronomy, and theoretical astronomy

Close Window

400202 Astrophysics

A program that focuses on the theoretical and observational study of the structure, properties, and behavior of stars, star systems and clusters, stellar life cycles, and related phenomena Includes instruction in cosmology, plasma kinetics, stellar physics, convection and non-equilibrium radiation transfer theory, non-Euclidean geometries, mathematical modeling, galactic structure theory, and relativistic astronomy

Close Window

400203 Planetary Astronomy and Science

A program that focuses on the scientific study of planets, small objects, and related gravitational systems Includes instruction in the structure and composition of planetary surfaces and interiors, planetary atmospheres, satellites, orbital mechanics, asteroids and comets, solar system

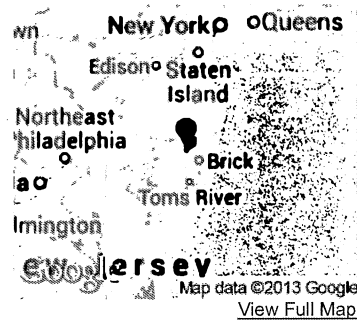
EXHIBIT 5

COLLEGE Navigator

Beth Medrash Govoha

617 6th St, Lakewood, New Jersey 08701-2754

General information: (732) 367-1060
Type: 4-year, Private not-for-profit
Awards offered: Bachelor's degree
Master's degree
Post-master's certificate
Campus setting: Suburb: Large
Campus housing: Yes
Student population: 6,374 (2,676 undergraduate)
Student-to-faculty ratio: 24 to 1



IPEDS ID: 183804
OPE ID: 00794700

⊕ GENERAL INFORMATION

Mission Statement

Beth Medrash Govoha is an institute for advanced Talmudic scholarship. Its primary objective is to produce Talmudic scholars. In the pursuit of this objective it also will provide a training ground for excellence in dedicated, highly educated, professional and lay community leadership.

The growth and diversity of its student body provide Beth Medrash Govoha with the ability to offer the broadest Talmudic curriculum available in any such institute in the world, providing its students with the opportunity to study almost any area in the widest spectrum of Talmudic study. Beth Medrash Govoha is dedicated to helping its students achieve the highest level of scholarship along with intensive commitment to academic excellence in every area of Talmudic Studies.

Beth Medrash Govoha carries out its objectives through its graduate and undergraduate divisions and through its community based programs. The Beth Medrash Govoha Undergraduate Division is a preparatory five-year college for the Rabbi Aaron Kotler Institute for Advanced Learning. The undergraduate program is designed to provide the student with a thorough foundation in the basic areas of Talmudic knowledge according to the traditional model of Talmudic scholarship. The program also prepares the student to integrate this scholarly training into his personal and professional life.

The Rabbi Aaron Kotler Institute for Advanced Learning, the Graduate Division of Beth Medrash Govoha, aims to promote advanced Jewish scholarship and research in classical Talmudic and cognate studies. In addition, it is concerned with professional orientation by providing programs to prepare these scholars as teachers and administrators in secondary Torah schools and institutions of higher Talmudic studies, as practicing Rabbis and as experts in Rabbinical jurisprudence.

Special Learning Opportunities

None

Student Services

Remedial services
Academic/career counseling service
Employment services for students

Credit Accepted

Institution does not accept dual, credit for life, or AP credits

Carnegie Classification

Special Focus Institutions--Theological seminaries, Bible colleges, and other faith-related institutions

Religious Affiliation

Not applicable

Federal Aid

Eligible students may receive Pell Grants and other federal aid (e.g. Direct Loans).

Undergraduate students enrolled who are formally registered with office of disability services

3% or less

Other Characteristics

Single-sex: Men

FACULTY AND GRADUATE ASSISTANTS BY PRIMARY FUNCTION, FALL 2011	FULL TIME	PART TIME
Total faculty	25	54
Instructional	25	53
Research and public service	0	1
Total graduate assistants	-	0
Instructional	-	0
Research and public service	-	0

⊕ TUITION, FEES, AND ESTIMATED STUDENT EXPENSES

⊕ FINANCIAL AID

⊕ NET PRICE

⊖ ENROLLMENT

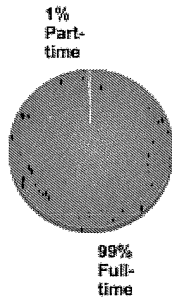
FALL 2011

TOTAL ENROLLMENT	6,374
Undergraduate enrollment	2,676
Undergraduate transfer-in enrollment	398
Graduate enrollment	3,698

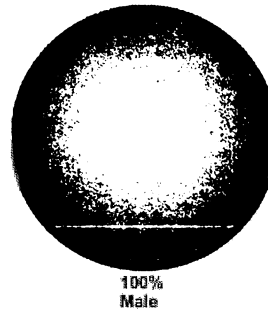
UNDERGRADUATE ATTENDANCE STATUS

UNDERGRADUATE STUDENT GENDER

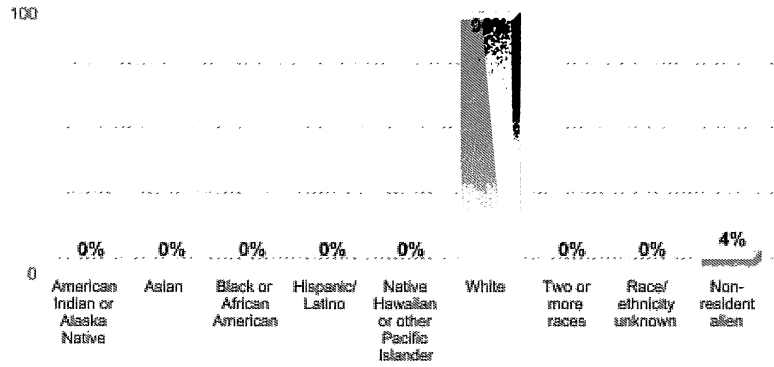
UNDERGRADUATE ATTENDANCE STATUS



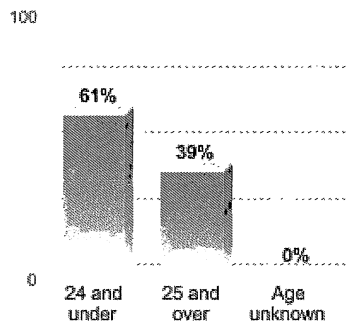
UNDERGRADUATE STUDENT GENDER



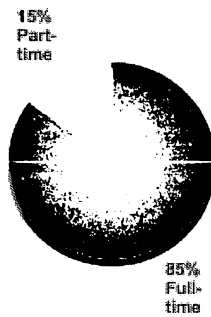
UNDERGRADUATE RACE/ETHNICITY



UNDERGRADUATE STUDENT AGE



GRADUATE ATTENDANCE STATUS



- ⊕ ADMISSIONS
- ⊕ RETENTION AND GRADUATION RATES
- ⊕ PROGRAMS/MAJORS
- ⊕ VARSITY ATHLETIC TEAMS
- ⊕ ACCREDITATION

[⊕ CAMPUS SECURITY](#)

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National Center for Education Statistics - <http://nces.ed.gov>
U.S. Department of Education

EXHIBIT 6

APPENDIX A

Section 7.2.1-1: Revised Cover Page

Name of Institution: Beth Medrash Govoha of America

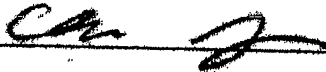
Project Name: Princeton Ave. Academic Center Construction of Academic Space

Total Project Cost: \$7,356,996

Address: 617 Sixth Street
Lakewood, NJ 08701

Contact Person: Mrs. Chanie Jacobowitz

Title: Director of Government Affairs

Signature: 

Telephone: (732) 367-1060, ext. 4219

Fax: (732) 200-3420

E-mail: cjacobowitz@bmg.edu

Included herein is an application for the following grant programs in the following amounts:

\$ 5,517,747 Building Our Future Bond Act

\$ _____ Higher Education Capital Improvement Fund

\$ _____ Higher Education Facilities Trust Fund

\$ _____ Higher Education Technology Infrastructure Fund

\$ _____ Higher Education Equipment Leasing Fund

\$ 5,517,747 TOTAL AMOUNT OF GRANT REQUESTED FOR PROJECT

Rabbi Aaron Kotler
BETH MEDRASH GOVOHA
Application # 006-02

7.2.1 RESPONSE TO GRANT APPLICATION REQUIREMENTS FOR ALL PROGRAMS

7.2.1-3: APPLICATION SUMMARY

7.2.1-3: PROJECT DESCRIPTION

Beth Medrash Govoha of America (“BMG”) is a private, non-profit Institution of Higher Education that offers Undergraduate and Graduate programs in New Jersey. BMG is licensed by the State of New Jersey to confer bachelor’s and master’s degrees, and the Institution is accredited by AART, a national accreditor. BMG’s student body numbers over 6,500. The Institution has the fifth largest Graduate School in New Jersey (the 2nd largest among the private institutions in the State), and close to 2,700 undergraduates.

With constant and sustained growth in enrollment, BMG has engaged in an ongoing process of planning, development and expansion through construction and renovation, expending significant resources and funds to that end. However, BMG has not had the opportunity to meet the full current need. At the same time, BMG’s student population continues to increase steadily.

BMG is therefore applying for funding from the Building Our Future Bond Act Program to expand the academic capacity of the Institution by constructing academic space through a major reconfiguration of the existing Princeton Avenue Academic Center Building, a 57,509 square foot, 3-story former High School building located at 655 Princeton Avenue in Lakewood Township, New Jersey. The proposed project will significantly increase the capacity of BMG’s academic programs by creating [REDACTED] study halls [REDACTED] classrooms, a daily-use reference library, a computer room with numerous workstations to enable students to access digital resources, faculty offices, and service rooms to support the academic use.

BMG put the Princeton Avenue Academic Center building into initial academic use in Fall 2012 by making basic improvements to the 4,500 square foot former gym on the first floor to create interim accommodations for 400 students and alleviate the Institution's space shortage. The Princeton Avenue Academic Center is more than 80 years old and therefore requires significant new equipment installation, including a completely new HVAC system, as well as other construction work in order to be put fully into use as academic space that is needed to accommodate BMG's current student body and anticipated growth over the next few semesters.

BMG therefore respectfully requests funding from the Building Our Future Bond Act to construct proper academic facilities throughout the entire building, so that it can be put into full use to accommodate a total of 1,530 students (FTE). BMG proposes to construct [REDACTED] new study halls totaling [REDACTED] square feet; [REDACTED] classrooms; several offices for Faculty, Academic Advisors and Academic Fellows; a library on the first floor intended to provide the most needed texts for daily reference use; a computer workroom with numerous workstations where students can access digital references; and 78 restroom units, 2 student break rooms and coatrooms to support the academic use of the building.

The current building consists of three levels with the lowest floor level (First Floor) [REDACTED] [REDACTED] approximately 6'-6" below grade which allows windows to the spaces at this level. There are two levels (Second and Third Floors) above grade. [REDACTED]

[REDACTED] [REDACTED] Most of the original building program other than the gym and a 2,200 square foot auditorium on the second floor consisted of 600-700 square foot classrooms

7.3.2-6: COSTS FOR REIMBURSEMENT/RETROACTIVE MATCH

N/A for this grant program.

7.3.2-7: PROJECT ADVANCES GOALS OF LONG RANGE FACILITIES PLAN, INCREASES ACADEMIC CAPACITY OF THE INSTITUTION, AND PROVIDES

A DIRECT BENEFIT TO STUDENTS

The proposed project directly advances the goals of BMG's Long Range Facilities Plan ("The Plan"). The proposed construction of academic space and HVAC overhaul at the Princeton Avenue Academic Center is on the list of Planned Capital Initiatives for 2013-2023 and is fully described in the Plan with an anticipated construction start in 2013. This project directly addresses the following goals and objectives described in the Plan³:

- Construct additional academic space, including study halls, classrooms, libraries and supporting facilities, in order to develop sufficient capacity to keep pace with current student needs and projected annual enrollment gains of 5%. As described in 7.2.1-5: Detailed Project Description, the proposed project will add four study halls, fourteen classrooms, a library room, and a computer room to BMG's academic capacity.
- Plan space allocation to accommodate the proper placement of Cluster Groups. As described in section 7.2.1.-6: How the Project Enhances Academic Capacity, the project incorporates construction of a number of relatively smaller study halls to accommodate Cluster Groups seeking a narrowly-focused and specialized learning environment, as well as Undergraduates who can benefit from a smaller learning environment as they become accustomed to the BMG model.

³ Ibid.

addition of study halls, appropriately configured classrooms and related academic space. The proposed project will therefore directly enhance academic capacity in the following manner:

- ❖ Alleviating the academic space shortage by constructing spacious and new instructional space. The construction of [REDACTED] new study halls totaling [REDACTED] square feet and [REDACTED] classrooms will increase the total student capacity of BMG's academic space by 1,130 students (FTE). This project is a crucial component of BMG's overall planning to ensure that academic facilities keep pace with the need, as enrollment is projected to grow by 5% annually, exceeding 10,000 students by 2020.²
- ❖ Providing space availability to enable enhancement of other academic spaces. This project will bring a double academic enhancement to BMG's academic capacity. In addition to providing direct space for new and current students to flourish academically, this project will have a "multiplier effect" on the academic facilities at BMG. When fully built-out, the Princeton Avenue Academic Center will have sufficient capacity in the short term to temporarily shift classes from the Kleinman Family Campus, enabling the Institution to upgrade and expand the Carey Street Academic Center. When BMG acquired the existing buildings on the Kleinman Family Campus (which is located one block north of BMG's Ninth Street Campus and fills the square block between Forest and Madison Avenues) these facilities were pressed immediately into interim use with only minor renovations performed, due to the urgent need for academic space. However, the Carey Street Academic Center in particular offers the potential for a greatly expanded student capacity, if proper expansion is completed. Construction of the Princeton Avenue Academic Center will create sufficient academic space in the short-term to relocate

² Ibid.

assistance to acclimate to BMG's educational model. The proposed construction of a dedicated computer workroom with numerous workstations at the Princeton Avenue Academic Center will expand student access to digital resources and scholarly databases. For more information as to how the proposed project will increase the academic capacity of the Institution, please see Section 7.2.1-6.

The project provides a direct benefit to students: As discussed above, 100% of the gross square footage of the Princeton Avenue Academic Center will be devoted to direct academic use or to facilities supporting the Academic Use. BMG does minimal recruiting, yet its enrollment has increased by 126% since 2000. Students are drawn to BMG's world-class program, resulting in consistent yearly increases in enrollment, with BMG's capital planning team conservatively projecting an annual growth rate of 5% per year over the coming decade⁵. The students are seeking a quality academic experience, but in order to accept them, BMG must have adequate and appropriate academic space in which to educate students. The proposed project directly benefits students by funding the construction of much-needed academic space, including the necessary HVAC and other systems improvements, as well as service rooms necessary for a comfortable, pleasant learning environment that is conducive to intellectual growth.

Students who attend classes at the proposed expanded Princeton Avenue Academic Center will also benefit directly from the proposed computer room offering access to numerous digital resources and scholarly databases; the on-site reference collection; and direct access to Faculty with offices in the building.

Those students who reside with their families in the new Princeton Avenue Student Family Housing complex will further benefit from the sense of academic community generated by living adjacent to a major academic hub of the Institution.

⁵ Ibid.

	Online Services	126
	Hospital	200
	Food Manufacturing	100
	Long Term Care	170
	Printing	30
	Towels Fabric And Nonwoven Materials	50
	Primary Care	100
	Home Therapy	306
	Secretarial and Court Reporting	158
	Medical Transport	400
	Real Estate	250
	Management Services	60
	School Bus Transportation	100
	Real Estate	60
	Rehabilitation	700
	Real Estate	1000
	Home Furnishings	50

2.2.4 Promotion of innovation and improvement

As discussed in Section 2.2.2, the proposed project will represent an *Improvement* in the delivery of higher education at BMG by offering students new, modern, upgraded facilities and an alternative configuration of study halls that better accommodates the needs of certain Cluster Groups and new Undergraduates. The proposed project also promotes *Innovation*, in setting new trends for tradition-steeped Talmudic studies programs. In particular, programs centered on Talmudic studies, with their traditional grounding in research texts, have been slow to transition to the use of digital resources. The proposed project brings the Talmudic-studies program apace with technological advancements and academe's increasing reliance on digital resources, while still ensuring that a full complement of traditional research texts is available.

EXHIBIT 7

Faculty (Full-time & Part-time) - Employed at NJ Institutions by Gender, Fall 2011

N.J. INSTITUTIONS	Men			Women			Total		
	Full-Time	Part-Time	TOTAL	Full-Time	Part-Time	TOTAL	Full-Time	Part-Time	TOTAL
Bloomfield College	29	82	111	41	78	119	70	160	230
Caldwell College	32	56	88	49	64	113	81	120	201
Centenary College	33	81	114	42	66	108	75	147	222
Drew University	81	44	125	88	60	148	169	104	273
Fairleigh Dickinson U-Florham	76	149	225	55	114	169	131	263	394
Fairleigh Dickinson U-Metro	108	315	423	83	265	348	191	580	771
Feliclan College	43	52	95	73	73	146	116	125	241
Georgian Court University	38	51	89	67	116	183	105	167	272
Monmouth University	119	134	253	140	178	318	259	312	571
Princeton University	1,068	155	1,223	400	106	506	1,468	261	1,729
Rider University	134	169	303	105	160	265	239	329	568
St. Elizabeth, College of	23	54	77	49	96	145	72	150	222
St. Peter's College	61	102	163	56	59	115	117	161	278
Seton Hall University	234	243	477	222	241	463	456	484	940
Stevens Institute of Technology	223	143	366	63	30	93	286	173	459
TOTAL, AICUNJ	2,302	1,830	4,132	1,533	1,706	3,239	3,835	3,536	7,371
Berkeley College	42	73	115	33	68	101	75	141	216
Devry University	26	82	108	13	78	91	39	160	199
Eastern International College	10	7	17	9	13	22	19	20	39
Eastwick College	9	22	31	20	47	67	29	69	98
Strayer University	4	22	26	4	13	17	8	35	43
University of Phoenix	14	26	40	10	26	36	24	52	76
TOTAL, PROPRIETARY	105	232	337	89	245	334	194	477	671
Assumption College	0	1	1	0	9	9	0	10	10
Bais Medrash Toras Chesed	7	4	11	0	0	0	7	4	11
Beth Medrash Govoha	25	54	79	0	0	0	25	54	79
New Brunswick Seminary	5	16	21	3	8	11	8	24	32
Princeton Seminary	30	8	38	11	5	16	41	13	54
Rabbi Jacob Joseph School	4	2	6	0	0	0	4	2	6
Rabbinical College of America	16	2	18	0	0	0	16	2	18
Somerset Christian College	4	19	23	2	12	14	6	31	37
Talmudcal Academy	4	0	4	0	0	0	4	0	4
Yeshivas Be'er Yitzchok	2	3	5	0	1	1	2	4	6
Yeshiva Toras Chaim	7	3	10	0	0	0	7	3	10
TOTAL, RELIGIOUS	104	112	216	16	35	51	120	147	267
TOTAL, ALL N.J. INST.	8,147	9,945	18,092	6,360	9,914	16,274	14,507	19,859	34,366

Source: Fall 2011 IPEDS Human Resources Survey (Downloaded March 8, 2012).

EXHIBIT 8

Enrollment in N.J. Colleges by Gender and Level, Fall 2012

NJ Colleges and Universities	UNDERGRADUATE			POST-BACCALAUREATE			TOTAL ENROLLMENT		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Bloomfield College	734	1,302	2,036	4	4	8	738	1,306	2,044
Caldwell College	521	1,070	1,591	138	484	622	659	1,554	2,213
Centenary College	752	1,139	1,891	249	436	685	1,001	1,575	2,576
Drew University	658	978	1,636	373	438	811	1,031	1,416	2,447
Fairleigh Dickinson University-Florham	1,073	1,323	2,396	260	411	671	1,333	1,734	3,067
Fairleigh Dickinson University-Metro	2,724	4,051	6,775	860	1,495	2,355	3,584	5,546	9,130
Felician College	489	1,306	1,795	48	286	334	537	1,592	2,109
Georgian Court University	190	1,429	1,619	119	575	694	309	2,004	2,313
Monmouth University	1,940	2,798	4,738	434	1,300	1,734	2,374	4,088	6,472
Princeton University	2,717	2,610	5,327	1,667	981	2,648	4,384	3,591	7,975
Rider University	1,921	2,657	4,578	315	592	907	2,236	3,249	5,485
Saint Elizabeth, College of	76	1,003	1,079	104	504	608	180	1,507	1,687
Saint Peter's University	926	1,391	2,317	282	446	728	1,208	1,837	3,045
Seton Hall University	2,260	3,237	5,497	1,850	2,483	4,333	4,110	5,720	9,830
Stevens Institute of Technology	1,882	693	2,575	2,328	746	3,074	4,210	1,439	5,649
TOTAL, PUBLIC-MISSION INDEPS	18,843	26,987	45,830	9,031	11,181	20,212	27,874	38,168	66,042
Berkeley College	949	1,929	2,878	0	0	0	949	1,929	2,878
Devry University	1,210	469	1,679	158	161	319	1,368	630	1,998
Eastern International College	54	385	439	0	0	0	54	385	439
Eastwick College	155	964	1,119	0	0	0	155	964	1,119
Strayer University	246	393	639	88	124	212	334	517	851
University of Phoenix	234	254	488	0	0	0	234	254	488
TOTAL, PROPRIETARY INDEPS	2,848	4,394	7,242	246	285	531	3,094	4,679	7,773
Assumption College	0	43	43	0	0	0	0	43	43
Bais Medrash Toras Chesed	126	0	126	0	0	0	126	0	126
Beth Medrash Govoha	2,696	0	2,696	3,842	0	3,842	6,538	0	6,538
Mesivta Keser Torah	39	0	39	0	0	0	39	0	39
New Brunswick Theological Seminary	0	0	0	86	100	186	86	100	186
Princeton Theological Seminary	0	0	0	299	215	514	299	215	514
Rabbi Jacob Joseph School	76	0	76	0	0	0	76	0	76
Rabbinical College	213	0	213	0	0	0	213	0	213
Somerset Christian College	131	229	360	0	0	0	131	229	360
Talmudical Academy	67	0	67	0	0	0	67	0	67
Yeshivas Be'er Yitzchok	59	0	59	0	0	0	59	0	59
Yeshiva Gedolah Zichron Leyma	26	0	26	0	0	0	26	0	26
Yeshiva Toras Chaim	145	0	145	0	0	0	145	0	145
TOTAL, RELIGIOUS INDEPS	3,578	272	3,850	4,227	315	4,542	7,805	587	8,392
TOTAL, INDEPENDENT INSTITUTIONS	25,269	31,653	56,922	13,504	11,781	25,285	38,773	43,434	82,207
N.J. GRAND TOTAL	171,228	204,371	375,599	28,279	34,785	63,064	199,507	239,166	438,663

SOURCE: Fall 2012 IPEDS Fall Enrollment Survey (Downloaded May 4, 2013).

EXHIBIT 9

Full-time Undergraduate Enrollment in N.J. Colleges by Race/Ethnicity, Fall 2012

NJ Colleges and Universities	WHITE		BLACK		HISPANIC		ASIAN		AMERIND		PACIFIC		ALIEN		2 or MORE		RACE UNKNWN		TOTAL ENR
	ENR	PCT	ENR	PCT	ENR	PCT	ENR	PCT	ENR	PCT	ENR	PCT	ENR	PCT	ENR	PCT	ENR	PCT	
Bloomfield College	237	13.0%	929	51.0%	364	20.0%	55	3.0%	6	0.3%	4	0.2%	57	3.1%	7	0.4%	161	8.8%	1,820
Caldwell College	585	46.4%	184	14.6%	197	15.6%	36	2.9%	3	0.2%	2	0.2%	61	4.8%	20	1.6%	172	13.7%	1,260
Centenary College	1,071	60.1%	211	11.8%	162	9.1%	32	1.8%	0	0.0%	0	0.0%	42	2.4%	10	0.6%	253	14.2%	1,781
Drew University	891	56.8%	159	10.1%	226	14.4%	74	4.7%	1	0.1%	0	0.0%	36	2.3%	38	2.4%	143	9.1%	1,566
Fairleigh Dickinson Univ-Florham	1,377	62.2%	245	11.1%	281	12.7%	81	3.7%	19	0.9%	0	0.0%	16	0.7%	19	0.9%	175	7.9%	2,213
Fairleigh Dickinson Univ-Metro	768	26.8%	476	16.5%	938	32.5%	167	5.8%	6	0.2%	5	0.2%	276	9.6%	27	0.9%	219	7.6%	2,882
Felician College	413	27.8%	250	16.8%	338	22.8%	110	7.4%	9	0.6%	6	0.4%	40	2.7%	11	0.7%	308	20.7%	1,485
Georgian Court University	711	57.2%	175	14.1%	134	10.8%	27	2.2%	2	0.2%	1	0.1%	4	0.3%	24	1.9%	166	13.3%	1,244
Monmouth University	3,516	79.2%	182	4.1%	388	8.7%	110	2.5%	4	0.1%	3	0.1%	30	0.7%	76	1.7%	128	2.9%	4,437
Princeton University	2,565	48.2%	392	7.4%	396	7.4%	1,015	19.1%	9	0.2%	3	0.1%	558	10.4%	219	4.1%	172	3.2%	5,327
Rider University	2,655	67.5%	367	9.3%	365	9.3%	201	5.1%	9	0.2%	7	0.2%	69	1.8%	77	2.0%	181	4.6%	3,931
Saint Elizabeth, College of	182	31.2%	205	35.2%	96	16.5%	13	2.2%	3	0.5%	1	0.2%	29	5.0%	5	0.9%	49	8.4%	582
Saint Peter's University	480	25.2%	573	30.1%	540	28.4%	186	9.8%	10	0.5%	6	0.3%	61	3.2%	39	2.1%	7	0.4%	1,902
Seton Hall University	2,562	51.0%	671	13.4%	809	16.1%	421	8.4%	17	0.3%	5	0.1%	106	2.1%	94	1.9%	338	6.7%	5,023
Stevens Institute of Technology	1,505	59.2%	62	2.4%	222	8.7%	275	10.8%	0	0.0%	0	0.0%	105	4.1%	0	0.0%	372	14.6%	2,541
TOTAL, PUBLIC-MISSION IND	19,518	51.4%	5,081	13.4%	5,456	14.4%	2,803	7.4%	98	0.3%	43	0.1%	1,488	3.9%	666	1.8%	2,844	7.5%	37,997
Berkeley College	496	20.8%	613	25.7%	975	40.8%	83	3.5%	13	0.5%	0	0.0%	27	1.1%	0	0.0%	180	7.5%	2,387
Devry University	250	33.4%	76	10.1%	196	26.2%	34	4.5%	1	0.1%	3	0.4%	10	1.3%	4	0.5%	175	23.4%	745
Eastern International College	30	9.6%	93	29.6%	145	46.2%	19	6.1%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	27	8.6%	314
Eastwick College	188	36.3%	166	32.0%	108	20.8%	36	6.9%	0	0.0%	4	0.8%	0	0.0%	3	0.6%	13	2.5%	515
Strayer University	24	34.3%	25	35.7%	9	12.9%	2	2.9%	1	1.4%	0	0.0%	1	1.4%	1	1.4%	7	10.0%	70
University of Phoenix	18	3.7%	135	27.7%	89	18.2%	10	2.0%	1	0.2%	0	0.0%	19	3.9%	13	2.7%	203	41.6%	485
TOTAL, PROPRIETARY IND	1,006	22.2%	1,108	24.5%	1,522	33.6%	184	4.1%	16	0.4%	7	0.2%	57	1.3%	21	0.5%	605	13.4%	4,525
Assumption College	2	7.7%	0	0.0%	0	0.0%	1	3.8%	0	0.0%	1	3.8%	22	84.6%	0	0.0%	0	0.0%	25
Bais Medrash Toras Chessed	125	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	125
Beth Medrash Govoha	2,549	95.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	110	4.1%	0	0.0%	0	0.0%	2,659
Mesivta Keser Torah	39	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	39
Rabbi Jacob Joseph School	76	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	76
Rabbinical College	152	71.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	61	28.6%	0	0.0%	0	0.0%	213
Somerset Christian College	32	11.1%	160	55.6%	82	28.5%	3	1.0%	0	0.0%	1	0.3%	0	0.0%	10	3.5%	0	0.0%	285
Talmudical Academy	67	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	67
Yeshivas Be'er Yitzchok	58	98.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	1.7%	0	0.0%	0	0.0%	59
Yeshiva Gedolah Zichron Leyman	25	96.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	3.8%	0	0.0%	0	0.0%	26
Yeshiva Toras Chaim	145	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	145
TOTAL, RELIGIOUS INDEPS	3,270	87.8%	160	4.3%	82	2.2%	4	0.1%	0	0.0%	2	0.1%	195	5.2%	10	0.3%	0	0.0%	3,723
TOTAL, INDEPENDENT INSTS	23,794	51.5%	6,349	13.7%	7,060	15.3%	2,991	6.5%	114	0.2%	52	0.1%	1,740	3.8%	697	1.5%	3,449	7.5%	46,245
N.J. GRAND TOTAL	117,715	48.1%	32,055	13.1%	44,359	18.1%	21,700	8.9%	555	0.2%	696	0.3%	6,608	2.7%	4,779	2.0%	16,127	6.6%	244,594

SOURCE: Fall 2012 IPEDS Fall Enrollment Survey (Downloaded May 4, 2013).

EXHIBIT 10

APPENDIX A

Section 7.2.1-1: Revised Cover Page

Name of Institution: Beth Medrash Govoha of America

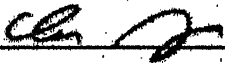
Project Name: Construction of Library and Research Center

Total Project Cost: \$6,824,000

Address: 617 Sixth Street
Lakewood, NJ 08701

Contact Person: Mrs. Chanie Jacobowitz

Title: Director of Government Affairs

Signature: 

Telephone: (732) 367-1060, ext. 4219

Fax: (732) 200-3420

E-mail: ciacobowitz@bmg.edu

Included herein is an application for the following grant programs in the following amounts:

\$ 5,118,000 Building Our Future Bond Act

\$ _____ Higher Education Capital Improvement Fund

\$ _____ Higher Education Facilities Trust Fund

\$ _____ Higher Education Technology Infrastructure Fund

\$ _____ Higher Education Equipment Leasing Fund

\$ 5,118,000 TOTAL AMOUNT OF GRANT REQUESTED FOR PROJECT

7.2.1 RESPONSE TO GRANT APPLICATION REQUIREMENTS FOR ALL PROGRAMS

7.2.1-3: APPLICATION SUMMARY

7.2.1-3: PROJECT DESCRIPTION

Beth Medrash Govoha of America (“BMG”) is a private, non-profit Institution of Higher Education that offers Undergraduate and Graduate programs in New Jersey. BMG is licensed by the State of New Jersey to confer bachelor’s and master’s degrees, and the Institution is accredited by AARTS, a national accreditor. BMG’s student body numbers over 6,500. The Institution has the fifth largest Graduate School in New Jersey (the 2nd largest among the private institutions in the State), and close to 2,700 undergraduates.

With constant and sustained growth in enrollment, BMG has engaged in an ongoing process of planning, development and expansion through construction and renovation, expending significant resources and funds to that end. However, BMG has not had the opportunity to meet the full current need. At the same time, BMG’s student population continues to increase steadily.

BMG is therefore applying for funding from the Building Our Future Bond Act Program to expand the academic capacity of the Institution by constructing a major new Library and Research Center to be located on BMG’s Kleinman Family Campus at 425 11th Street in Lakewood Township, New Jersey. The proposed project, a three-story library and academic building, will significantly increase the capacity of BMG’s academic programs and allow the Institution to offer increased access to its extensive research collections.

The full-service reference library on the second floor of the proposed building will be 90% larger than BMG's current largest library, with an immediate circulating collection of 13,810 books and significant capacity for growth over time, as well as storage capacity for 63,450 volumes that will be rotated into circulation. The proposed Library and Research Center will also bring a number of specialized BMG Academic Departments together on the 3rd floor of the facility, which will enhance their effectiveness and student access to these resources, including the Student Writing Resource Center, Department of Hebrew Studies, Department of Adult and Continuing Education, student internship advisors, Student Pathways to Success Career Advisement and Academic Advisement and Counseling.

The proposed project is Construction Ready. BMG has an approved site plan, and signed and sealed architectural, structural, electrical, mechanical and plumbing schematics. Building permits are expected to be issued by the end of March 2013. BMG is currently completing pre-construction work on the site.

The proposed project is Cost-Effective. BMG has made every effort to design a reasonably priced building that will serve the maximum number of students. The primary user population consists of the 2,075 students who attend classes at the Kleinman Family Campus, but in actuality the proposed Library and Research Center will be utilized by students from all four of BMG's Urban Campuses in Lakewood.

The proposed project is a key near-term priority project identified in the Institution's Long Range Facilities Plan for its numerous benefits to students and as a critical enhancement to BMG's academic capacity.

7.2.1-3: PROGRAMS & AMOUNT OF FUNDING SOUGHT:

Beth Medrash Govoha respectfully applies for \$5,118,000 from the Building Our Future Bond Act Grant Program to support the construction of the Kleinman Family Campus Library and Research Center.

The [REDACTED] Foundation has committed to provide the required 25% matching funds as a gift to BMG, and the Foundation has also provided an additional grant to fund the "soft costs" related to project development.

BMG plays a key role in keeping New Jersey students in New Jersey and encouraging immigration of talented students from out-of-state who come for the education and remain to build their families and businesses, thereby building up the State's workforce and economic competitiveness. Funding from the Building Our Future Bond Act will enable BMG to expand and advance this effort to benefit students and the State of New Jersey as a whole.

The Library and Research Center building will address the need for a full-service library on the Kleinman Campus and also address the need for a full-service reference library to serve the needs of students from BMG's other campuses in Lakewood. The new main reference library, which will be located on the 2nd floor of the new building, will be 90% larger than BMG's current "main library" at 7th Street (the Rosansky Library). The construction of the new main library facility will provide ready access to the School's extensive and nationally recognized collection, and greatly enhance the academic and research experience for the student body.

The building will have three stories above grade, no cellar, and a total of [REDACTED] gross square feet. The first floor includes an entry lobby, support and storage space for the library, and some student support space such as coat rooms and a small lounge. The library support and storage space will serve both the proposed new library and the current Rosansky library, as well as the smaller libraries and open-stack collections located throughout BMG's Urban Campus. The reference collection storage area will accommodate 63,450 volumes, sufficient to accommodate some 50,000 volumes that will be moved from a temporary holding facility, as well as the future growth of collections. (These are volumes that are rotated into circulation in the main libraries and smaller libraries throughout the campus as needed depending on course offerings in a given semester.)

The second floor is predominantly occupied by the [REDACTED] library, which will have sufficient shelving space along the outer walls for 15,345 volumes when opened, and the potential to add additional stacks as the need arises. Also included is the upper part of the double-height main lobby (giving the library greater visibility and presence at the entry), meeting rooms, a librarian's office and a book cart storage area. The third floor includes classrooms, faculty and student meeting rooms, faculty offices, BMG's Department of Hebrew

Studies and Student Writing Resource Center, the Department of Adult and Continuing Education, student internship advisors, BMG's Student Pathways to Success Advisement Program, workrooms for Graduate Students and Academic Fellows, and larger rooms devoted to scholarly research and writing projects connected with the library.

All building entrances are at grade and handicap-accessible. A passenger elevator serves all floors and all spaces within the building are accessible. [REDACTED]

[REDACTED] Windows will be thermally broken aluminum frames with insulated and tinted and Low-E coated glass units. Interior partitions will be metal stud with gypsum board finish; there will be suspended acoustic tile ceilings. Floor finishes will include porcelain tile for the main lobby and corridors, carpet for the library, and vinyl composition tiles (VCT) for classrooms and support spaces. Rooftop package units will provide the heating, ventilation and air conditioning. Life safety systems include full sprinklers and fire alarm. Lighting will be high-efficiency fluorescent fixtures, with a programmable control system to maximize energy efficiency. There will be a new 600 amp electrical service. Sanitary waste will tie into the New Jersey American Water sewer system.

7.2.1-5a: DESIGN INFORMATION

Design is complete, with the exception of final selection of restroom finishes and the like.

- **Approved Site Plan:** The Library and Research Center was approved as part of an overall Kleinman Family Campus Site Plan, SP #1957, that was adopted by the Planning Board of the Township of Lakewood at a Regular Meeting held on the 28th day of June,

Management including Construction Cost Summary, Construction Cost Detail and Basis of Estimate.

See Attachment X for a chart that summarizes the proposed project construction budget and source of funds to cover costs, and summarizes pre-construction soft costs (architectural, planning, engineering, filing fees, legal, environmental assessment, construction management, etc.) and post-construction FFE (Furniture, Fixtures and Equipment) costs that are not part of the proposed project budget, as well as the source of funds for these costs (private donor and Institutional funds). A private foundation, the [REDACTED] Foundation, has committed to fund the full 25% of project-cost match required for the Building Our Future Bond Act grant program, up to \$2 million (please see 7.3.2-5 for further detail). [REDACTED]

[REDACTED]

7.2.1-5c: BUDGET FOR INCREMENTAL OPERATING COST AND SOURCE OF REVENUE

In several ways, the proposed new building is expected to decrease overall operating cost to the Institution, as academic departments and programs will be moved out of temporary modular trailers that are inefficient to heat and cool and involve increased maintenance costs. BMG will be re-assigning library staff and a cadre of library assistants who are employed through the Federal Work-Study program to this facility, thereby limiting significant growth in operating cost to the Institution. It is estimated that the proposed new building will involve specific new costs to the Institution, and these will be paid for out of Institutional Funds from the general

- ❖ Providing students with “quiet space” – dedicated study and research space within the academic library.
- ❖ Providing an efficient, adequate and accessible location for proper storage to enable rotating of collections each semester.
- ❖ Providing dedicated work space for the use of Senior Graduate Students and Academic Fellows.
- ❖ Bringing together in one location BMG’s specialized educational programs, including the Department of Hebrew Studies, the Student Writing Resource Center, the Department of Adult and Continuing Education, the Student Pathways to Success Program, and Academic Advisement and Counseling thereby easing student access to these varied departments; enabling cross-fertilization of ideas; and providing a permanent home with adequate space and equipment resources for these key academic programs. Please see section 7.2.1-6 for additional detail on how the proposed project will increase the academic capacity of the Institution.

The proposed project provides a direct benefit to students: The proposed Library and Research Center will directly benefit BMG students, who will now have daily access to a full-service reference library with permanent circulation of 13,810 volumes in the main circulation room (with room to increase to 15,345 and beyond) and rotating collections from the 63,450 volume storage area; numerous workstations offering access to thousands of reference texts in scholarly reference databases; comfortable “quiet space” for research and reading; and more convenient access to a multitude of resources on the third floor including the Student Writing Resource Center, career advisement, student internships, and academic advisement and counseling.

for New Jersey residents seeking a degree in Talmudic Studies. An Economic Impact Report on BMG prepared by Appleseed in September 2011 found that BMG's student population contains a high percentage of New Jersey residents, as follows: "Approximately 66 percent of undergraduate and 94 percent of graduate students were residents of Ocean County [New Jersey]. These figures include students who originally came to Lakewood in order to study at BMG and made the decision to establish permanent residence in the Township, with many buying homes, opening businesses and finding employment for themselves or their family members⁹."

The proposed new Library and Research Center is a key element in drawing students from New Jersey, from throughout the nation, and from around the globe to BMG. Students come to BMG because they know that the breadth and scope of the topics and levels in Talmudic studies offered at BMG cannot be found anywhere else in the United States. The academic reference library is a most important infrastructure component, enabling BMG to sustain and grow its academic programs. The proposed Library and Research Center therefore will contribute directly to the advancement of student education in New Jersey by ensuring that current BMG students have access to adequate library resources and research space, and by providing the infrastructure necessary for BMG to accommodate additional growth in enrollment to meet student demand, thereby keeping more New Jersey resident students in New Jersey, and drawing in new students from out of state who will establish their families and careers in New Jersey (in many cases with the guidance of BMG's Student Pathways to Success program, which will be located in the proposed new building).

⁹ "Driving Economic Growth: Valuing Beth Medrash Govoha's Contribution to Lakewood Township and the State of New Jersey." Prepared by Appleseed. September 2011.

become a central student gathering place enables more students to become interested in and participate in these various programs. Additionally, Faculty, Academic Fellows, and Academic Advisors can benefit from their own sense of community and cross-fertilization of ideas to strengthen the educational opportunities they are able to offer to BMG students¹⁷.

2.2.3 Promotion of academic research excellence & workforce readiness; enhancement of State's academic and economic competitiveness

The proposed Library and Research Center will directly *Promote Academic Research Excellence* by making available on a constant basis more than 13,000 volumes of research text (and enabling the efficient circulation of 63,000 additional volumes from the library storage facility) and thousands of resources and texts in digital databases to directly support the academic research of Talmudic studies students at all levels of BMG's programs, from beginning undergraduates writing their first papers to Advanced Academic Fellows who are writing academic texts and coordinating complex Talmudic research projects.

The proposed new facility will promote *Workforce Readiness* for New Jersey: According to the New Jersey Task Force on Higher Education, "New Jersey's economy will continue to be driven by college graduates. By 2018, New Jersey will be second only to Massachusetts in the proportion of its jobs that require a bachelor's degree¹⁸." BMG, with the 6th largest undergraduate school of New Jersey's 25 private, non-profit institutions¹⁹, is a strong contributor to the population of bachelor degree-holding residents of New Jersey. Furthermore, the

¹⁷ See also See also, "How the Project Enhances Academic Competitiveness," Section 7.2.1-6 of this application, for further information.

¹⁸ The Report of the Governor's Task Force on Higher Education," December, 2010. Prepared by The New Jersey Higher Education Task Force, The Hon. Thomas H. Kean, Chair.

¹⁹ Calculated based on Fall 2011 Enrollment in New Jersey Colleges and Universities, Statistics & Tables, New Jersey Higher Education Website. Source Cited: Fall 2011 IPEDS Fall Enrollment Survey.

	Online Services	126
	Hospital	200
	Food Manufacturing	100
	Long Term Care	170
	Printing	30
	Towels Fabric And Nonwoven Materials	50
	Primary Care	100
	Home Therapy	306
	Secretarial and Court Reporting	158
	Medical Transport	400
	Real Estate	250
	Management Services	60
	School Bus Transportation	100
	Real Estate	60
	Rehabilitation	700
	Real Estate	1000
	Home Furnishings	50

2.2.4 Promotion of innovation and improvement

As discussed in Section 2.2.2, The Library and Research Center will represent an *Improvement* in the delivery of higher education at BMG by offering students larger, more extensive, and improved library facilities, including BMG's first library space with significant dedicated study and research space within the library itself. The proposed new facility will also enhance the effectiveness and cohesiveness of several BMG academic department and increase student access to academic advisement and counseling, internship advisement, and workforce readiness services. Students more comprehensively use services that are co-located, and faculty can more effectively coordinate when multiple departments are involved with one student.

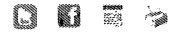
The proposed Library and Research Center also promotes *Innovation*, in setting new trends for tradition-steeped Talmudic studies programs. In particular, programs centered on Talmudic

studies, with their traditional grounding in research texts, have been slow to transition to the use of digital resources. The proposed Library and Research Center brings the Talmudic-studies program apace with technological advancements and academe's increasing reliance on digital resources, while still ensuring that a full complement of traditional research texts is available. The third floor of the new building is a hub for innovation, as it will house several programs that are unique and innovative projects for schools of Talmudic studies – in particular Student Pathways to Success, with its comprehensive model of fostering career focus throughout the student's time in school

2.2.5 Advancement of Study in Science, Technology, Engineering, and Mathematics Education

BMG focuses on doing what the Institution does best: offering programs focused on Talmudic-studies, which contain a critical thinking liberal-arts core that fosters and develops reasoning and decision making skills; expertise in textual analysis; and the ability to consider and contrast arguments, synthesize sources, defend a position, communicate effectively, and absorb and apply large amounts of information rapidly. Although BMG does not directly offer degree programs in the STEM concentrations, it does provide its students with broad-based knowledge and the transferable skills to exceed in graduate programs in Science, Technology, Engineering, and Mathematics. BMG graduates have gone on to excel at Graduate Programs in these fields and to establish careers in Engineering, Economics, Actuarial Services, IT Management, Software Design, Healthcare, Education, and other fields that advance STEM priorities. Students headed into graduate studies in Science, Technology, Engineering and Mathematics have a particular need to acquire the information literacy and research skills that can only be learned by using a

EXHIBIT 11



Mission Statement

Princeton Theological Seminary prepares women and men to serve Jesus Christ in ministries marked by faith, integrity, scholarship, competence, compassion, and joy, equipping them for leadership worldwide in congregations and the larger church, in classrooms and the academy, and in the public arena.

A professional and graduate school of the Presbyterian Church (U.S.A.), the Seminary stands within the Reformed tradition, affirming the sovereignty of the triune God over all creation, the Gospel of Jesus Christ as God's saving word for all people, the renewing power of the word and Spirit in all of life, and the unity of Christ's servant church throughout the world. This tradition shapes the instruction, research, practical training, and continuing education provided by the Seminary, as well as the theological scholarship it promotes.

In response to Christ's call for the unity of the church, the Seminary embraces in its life and work a rich racial and ethnic diversity and the breadth of communions represented in the worldwide church. In response to the transforming work of the Holy Spirit, the Seminary offers its theological scholarship in service to God's renewal of the church's life and mission. In response to God's sovereign claim over all creation, the Seminary seeks to engage Christian faith with intellectual, political, and economic life in pursuit of truth, justice, compassion, and peace.

To these ends, the Seminary provides a residential community of worship and learning where a sense of calling is tested and defined, where Scripture and the Christian tradition are appropriated critically, where faith and intellect mature and life-long friendships begin, and where habits of discipleship are so nourished that members of the community may learn to proclaim with conviction, courage, wisdom, and love the good news that Jesus Christ is Lord.

Adopted by the Board of Trustees, May 1996

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Logo and Identity Manual

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FOR THE MEDIA

- [Faculty Experts](#)
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NEWS

- [Three Young Scholars Join Princeton Seminary Faculty](#)

EXHIBIT 12

COPY

APPENDIX A
REVISED COVER PAGE

Name of Institution: Princeton Theological Seminary
Project Name: Revamped Cooper Conference Room
Total Project Cost: \$579,778.00
Address: 64 Mercer Street, P.O. Box 821
Princeton, New Jersey 08540-0803
Contact Person: Mr. Adrian Backus
Title: Vice President for Information Technology
Signature: 
Telephone: (609) 497-7837
Fax: (609) 524-6020
E-mail: adrian.backus@ptsem.edu

Included herein is an Application for a Project that seeks funding from the following grant programs in the amounts indicated below:

\$ 289,889.00 Higher Education Technology Infrastructure Fund
\$ 289,889.00 TOTAL AMOUNT OF GRANT REQUESTED FOR PROJECT

Dr. Iain R. Torrance, President
PRINCETON THEOLOGICAL SEMINARY
Application # 038-03

Introduction

Princeton Theological Seminary (PTS) is a denominational school offering ecumenical and interdenominational graduate theological education. Founded by the Presbyterian Church over 200 years ago in Princeton, New Jersey, the Seminary educates men and women of the State of New Jersey for traditional church leadership and, increasingly, for employment in many professional, humanitarian and corporate endeavors to which they bring the added dimension of faith. New Jersey students comprise approximately 15% of the institution's enrollment in any given year. The Seminary attracts students to its campus from all parts of the United States and has a worldwide constituency, as well.

The School of Christian Vocation and Mission (SCVM) is the continuing education department of Princeton Theological Seminary. SCVM's educational programs are known for combining academic rigor with practical application to leadership within civic organizations and churches. SCVM strives to cultivate more informed people of faith, who are also equipped with the mindset, mentors, and practical skills needed to lead congregations, non-profit organizations and community groups in the 21st century.

5.1 Eligibility

5.1.A Eligibility

The Institution: Princeton Theological Seminary is a private nonprofit institution of higher education authorized to grant advanced academic degrees. The Seminary is accredited by the Association of Theological Schools (ATS) in the United States and Canada, as well as by the Middle States Commission on Higher Education (MSCHE), one of three accrediting Commissions of the Middle States Association of Colleges and Schools. The following six

5.1.C. Advancing the Institution (continued)

of another PTS smart classroom located across the street in the Seminary's new library complex. Having two such classrooms in close proximity will provide significant advantages for the Seminary's educational programs and for those of other institutions that use SCVM facilities. Currently, registration for events must be capped at 100 to fit within the physical constraints of the Cooper Conference Room, but, with two rooms equipped with multi-point video conferencing and a full range of multimedia features, it will be possible to host media-rich educational events for groups as large as 200 people.

5.1.D. Inter-Institutional Connectivity

Through existing reciprocal inter-institutional academic relations, Princeton Seminary is poised to enhance the connectivity and information technology relative to instruction and research that advances the missions of New Jersey institutions. The institutions involved include **Princeton University, Westminster Choir College of Rider University, New Brunswick Theological Seminary**, and, at the PhD level, **Jewish Theological Seminary**. Students may enroll in courses without paying additional tuition at participating schools. Students from other New Jersey institutions of higher education enroll for Seminary courses upon payment of tuition. Among them are students, typically earning the Master of Social Work degree, from **Rutgers, the State University of New Jersey**.

The School of Christian Vocation and Mission has already compiled a wealth of resources accessible to the wider public and has effectively managed the reappropriation and reuse of those resources, thereby expanding their reach. The Seminary's mission is the preparation of men and women for theological leadership; however, the Seminary is also in

EXHIBIT 13

COPY

APPENDIX A

REVISED COVER PAGE

Name of Institution: Princeton Theological Seminary

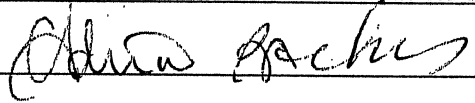
Project Name: Learning Spaces: Training Room

Total Project Cost: \$ 227,422.99

Address: 64 Mercer Street, P.O. Box 821
Princeton, New Jersey 08540-0803

Contact Person: Mr. Adrian Backus

Title: Vice President for Information Technology

Signature: 

Telephone: (609) 497-7837

Fax: (609) 524-6020

E-mail: adrian.backus@ptsem.edu

Included herein is an Application for a Project that seeks funding from the following grant programs in the amounts indicated below:

\$ 113,711.50 Higher Education Technology Infrastructure Fund

\$ 113,711.50 TOTAL AMOUNT OF GRANT REQUESTED FOR PROJECT

Dr. Iain R. Torrance, President
PRINCETON THEOLOGICAL SEMINARY

Application # 038-02

Introduction

Princeton Theological Seminary is a denominational school offering ecumenical and interdenominational graduate theological education. Founded by the Presbyterian Church over 200 years ago in Princeton, New Jersey, the Seminary educates men and women of the State of New Jersey for traditional church leadership and, increasingly, for employment in many professional, humanitarian and corporate endeavors to which they bring the added dimension of faith. New Jersey students comprise approximately 15% of the institution's enrollment in any given year. The Seminary also attracts students to its campus from all parts of the United States and has a worldwide constituency, as well. In academic year 2012-13, 42 states are represented on campus, as well as 19 foreign countries, the Commonwealth of Puerto Rico and the U.S. Territory of Guam. There are currently more than 500 students enrolled in six degree programs.

5.1 Eligibility

5.1.A Eligibility

The Institution: Princeton Theological Seminary is a private nonprofit institution of higher education authorized to grant advanced academic degrees. The Seminary is accredited by the Association of Theological Schools (ATS) in the United States and Canada, as well as by the Middle States Commission on Higher Education (MSCHE), one of three accrediting Commissions of the Middle States Association of Colleges and Schools. The following six degree programs are approved: Master of Arts (MA), Master of Divinity (MDiv), Master of Divinity/Master of Arts (MDiv/MA) Dual Degree program, Master of Arts - Theological Studies (MA(TS)), Master of Theology (ThM), and Doctor of Philosophy (PhD).

7.2.1.5.C Budget for Project Lifespan (continued)

Ongoing Operating Expenses

	<u>PTS Operating Budget</u>	<u>5 Year Total, PTS Operating Budget</u>
Annual Maintenance Costs	\$6,000.00	\$30,000.00
Annual Operating Expenses	\$4,500.00	\$22,500.00
Subtotal:	\$10,500.00	\$52,500.00
Subtotal, HETI Funded:		\$113,711.50
Subtotal, PTS Capital Funded		\$113,711.50
Subtotal, 5 Year PTS Operating Budget		\$166,211.50
Project Total, 5 Years:		\$279,922.99

7.2.1.5.D Planned Project Lifespan

The overall lifespan of the project is expected to exceed five years, before new technologies are expected to make replacement more cost effective than continued maintenance. Select individual components have significantly longer expected useful lifespans, providing additional long-term value from this project

7.2.1.6 Academic and/or Research Programs served by the Project; Enhancement of the Academic Capacity of the Institution

The Training Room will have an immediate impact on training at the Seminary from an academic perspective. Ranging from improving students’ information and digital literacy to displaying the possibilities of sophisticated qualitative analysis software to rising scholars, the training room provides the beginnings of success for many students, something unique to PTS among its peer institutions. For a decade, training has been conducted in a renovated Media

7.2.1.6 Academic and/or Research Programs (continued)

This possibility for off-site learning, combined with IT's commitment to live into the aim of the new library building, which is being referred to as a library for the world, paves the way to establish new partnerships. IT has already identified and is building relationships with external organizations. One example is the Administrative Personnel Association of the Presbyterian Church (APA), which offers a range of professional development opportunities for support staff. As APA members often work in churches, many of which have PTS graduates serving as pastors, they are a natural partner but one with limited financial resources. APA members can benefit professionally by achieving appropriate certifications in order to not only improve their skillset, but expand their employment options. The Seminary is already taking first steps by offering training to APA members in June 2013, but the addition of the training room allows for a greater number of participants who will be able to connect from any location where an Internet connection is available.

Since its formation, Academic Services has offered training for software and technology tools to faculty and students to improve their academic experience and productivity. This training service, unique among the Seminary's peer institutions, allows greater flexibility and experimentation. Faculty are able to boldly attempt new pedagogical strategies, students can be more efficient when studying ancient texts, and scholars can more effectively collect and analyze research data pertinent to their work and advancing scholarship. Below is a sampling of academic specific technology training courses.

- Blackboard: The Seminary has been on Blackboard for a decade using it as its Learning Management System (LMS). Training in group settings, as well as individual support when necessary, is available to faculty and teaching assistants to better organize, structure

7.6.2.3 Plan for Technology (continued)

Department of Information Technology is fulfilling its internal strategy and contributing to the strategic plan of the institution.

The Seminary's mission is the preparation of men and women for theological leadership; however, the Seminary is also in service to educators, students and lay people throughout the State, the nation, and globally. Its resources are accessed in support of congregations of all denominations and faiths and as resources for the study of history and the demographic movements of populations throughout history. The enhanced inter-institutional connectivity offered by this project will multiply the impact of the Seminary's mission.

For Princeton Theological Seminary Technology Plan see PTS Appendix A

7.6.2.4 Advancing the Institution

Princeton Theological Seminary in 2001 was one of the first institutions of higher education in the U.S. to adopt a converged technology solution to integrate video, voice and data. Its early prediction of cost effectiveness has led to reduced phone line costs and full virtualization of all servers. With more than a decade of experience in leveraging integrated technology costs effectively, the Seminary can expand its digital "reach" with the support of the Higher Education Technology Infrastructure grant by making key audio/visual resources accessible to a wider audience.

The funding sought by the Seminary for this project to advance the use of its integrated voice/video/data network operates on three levels:

- Capture and distribute high quality video and data;
- Ensure high reliability and high availability of converged network resources; and

7.6.2.7 Selection Criteria

Introduction: In the interests of serving the State that has been home to Princeton Theological Seminary since its founding in 1812, the Seminary seeks to fully satisfy the Selection Criteria as outlined by the State of New Jersey Office of Higher Education. The Seminary is among New Jersey's unique offerings to our nation and to the world. Nothing comparable concerning Protestant Christianity exists for research, reflection and the education of people of faith, whether they serve in ministry or in a great range of professions, including those of educators, corporate leaders, government servants, health care workers, military officers, lawyers, welfare advocates, humanitarians – the Seminary's graduates bring the added dimension of faith to their leadership in numerous careers. **The Seminary is committed to:**

1. **Advancing student education in the State of New Jersey.** As research in the humanities transitions into more digital formats, information and digital literacy remain crucial to the curriculum. The Training Room will allow Princeton Seminary to continue as a leader in theological education by offering its internal training programs to other institutions and the wider public. Training materials for advanced academic software, business productivity software, library resources, and others will achieve wider dissemination through the creation of the Training Room. Infrastructure enhancements will allow for improved and increased storage capacity and create the foundation necessary for longer term projects such as an academic repository containing traditional print material in a digital format, course materials, and videos of on-campus lectures.

2. **Improving and expanding educational opportunities for students:** Currently, the Seminary hosts adult scholars and representatives of congregations from all parts of the State and nation for seminars, workshops and short courses and, for those more distant or unable to travel,

7.6.2.7 Selection Criteria (continued)

6. Maintaining consistency with the Seminary's educational mission. The proposed project is essential to the Seminary's educational mission. That mission is the preparation of men and women for ministry to congregations and for Christian leadership in communities and professional environments. Especially since Princeton Seminary supports scholarship for advanced degrees, it is imperative that its library offers the tools expected in a major research library. This project will help to meet the growing demand among scholars for electronic and interactive access to the library's academic and research resources.

7. Maintaining consistency with the Seminary's long-range facilities plan for technology. The current deployment of technological enhancements to the Seminary's telecommunications system and services is consistent with the Seminary's original intent since 2001 to leverage the converged use of VoIP (video, voice and data technology) to enhance teaching, learning, and research opportunities in service to our faculty, students and guests.

This effort will be achieved, given the newly implemented technical capacities, i.e., increased bandwidth, networked wireless capacity, etc. Effective online distance learning will be enhanced. More access will be provided to an abundance of newly available digitally stored academic and literary materials developed in an electronically stored format. The upgrade of the current telecommunications infrastructure additionally allows the Seminary to construct and design flexible learning spaces to meet the growing need of its users to connect and access information through mobile, wireless and other devices. Thus, current and future classroom design will be consistent with the newly emerging learning styles of future generations who seek networked learning opportunities. This includes the lifelong learner.

7.6.2.7 Selection Criteria (continued)

To ascertain necessary information from these learners and instructors on an on-going basis, the newly established integration policy reinforces the importance of good governance, and allows the voice of the teachers, learners, researchers, and administration to collaborate and work judiciously towards sustaining this precious gift, the telecommunications network, in a more cost effective way.

This project also mirrors the guiding principles established in the technology plan as the infrastructure permits greater access, is designed to adapt later innovations and promotes collaboration. Thus, the members of the technology department are committed to supporting the mission, vision and values statement of the technology plan which articulates the need to prepare men and women, in accordance with the Seminary's stated mission, for all of the many forms and vocations in ministry, in service to the church and world.

8. Insuring the cost-effectiveness of the proposed infrastructure Project. Financial management at Princeton Seminary is professional and responsible. The Seminary's business office is fully staffed with a controller and assistant controller, accountants, payroll coordinators, a purchasing agent – all supervised by the Seminary's senior vice president, chief operating officer and treasurer and accountable to the Seminary President and the Board of Trustees. Annual financial audits are performed by an outside agency and the Seminary is found to be in full compliance.

9. Proposing an infrastructure Project that is consistent with the State's goals and priorities. This project is compatible with the recommended technology infrastructure for New Jersey higher education. For a complete discussion, please see section 7.6.2.5.

EXHIBIT 14

COPY

**APPENDIX A
REVISED COVER PAGE**

Name of Institution: Princeton Theological Seminary

Project Name: Enhanced IT Infrastructure for Renovated Luce Library

Total Project Cost: \$483,444.38

Address: 64 Mercer Street, P.O. Box 821
Princeton, New Jersey 08540-0803

Contact Person: Mr. Adrian Backus

Title: Vice President for Information Technology

Signature: *Adrian Backus*

Telephone: (609) 497-7837

Fax: (609) 524-6020

E-mail: adrian.backus@ptsem.edu

Included herein is an Application for a Project that seeks funding from the following grant programs in the amounts indicated below:

\$ \$241,722.19 Higher Education Technology Infrastructure Fund

\$ \$241,722.19 TOTAL AMOUNT OF GRANT REQUESTED FOR PROJECT

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**Dr. Iain R. Torrance, President
PRINCETON THEOLOGICAL SEMINARY
Application # 038-01**

13 APR 11 09:11:19:33

5.1.B Technology infrastructure

Building on its past investments in infrastructure, PTS is ready to move its converged network into its third generation. This is expected to support high definition video conferencing and telepresence, as well as facilitate access to volumes of digitized resources including books, video, and audio. This infrastructure is expected to remain compatible with other intrainstitutional systems, and continue to be compatible with inter-institutional communication, with the resources available for use both on campus, by New Jersey residents and institutions, and around the world, using standard Internet protocols.

5.1.C. Advancing the Institution:

In 2001, Princeton Theological Seminary was one of the first academic institutions of higher education in the country to adopt a converged technology solution to integrate video, voice and data. The Seminary has over a decade of experience in leveraging integrated technology. Through this grant, the Seminary will be able to advance its digital "reach" to the next level, able to offer its unparalleled resources for historical and theological research and reference to a vastly broader community without constraint of time or place and across the widest range of technological devices. The project includes content creation for digital access, an upgrade of the underlying communications infrastructure, provision of a redundant, diverse-pathway fiber backbone to the network, and extension of the reach of the fiber optic network, accomplished with economy and efficiency by running it along with the redundant backbone fiber. These enhancements will provide a synergy, allowing the Seminary to move to the next level of utilization of its converged network.

5.1.D. Inter-Institutional Connectivity:

Through existing reciprocal inter-institutional academic relations, Princeton Seminary is poised to enhance the connectivity and information technology relative to instruction and research that advances the missions of New Jersey institutions. The institutions involved include **Princeton University, Westminster Choir College of Rider University, New Brunswick Theological Seminary**, and, at the PhD level, **Jewish Theological Seminary**. Students may enroll in courses without paying additional tuition at participating schools. Students from other New Jersey institutions of higher education enroll for Seminary courses upon payment of tuition. Among them are students, typically earning the Master of Social Work degree, from **Rutgers, the State University of New Jersey**.

The scope of technological advances proposed in this application will result in the enhancement of Open Educational Resources (OER) for scholarly collaboration and support services for educators and researchers. These advances will connect infrastructure for intra- and inter-institutional repositories, not only among the reciprocal institutions but for free access by all educators and students in New Jersey who may “visit” the Seminary library electronically.

The Seminary’s mission is the preparation of men and women for theological leadership; however, the Seminary is also in service to educators, students and lay people throughout the State, the nation, and globally. Its resources are accessed in support of congregations of all denominations and faiths and as resources for the study of history and the demographic movements of populations throughout history. The enhanced inter-institutional connectivity offered by this project will multiply the impact of the Seminary’s mission.

7.2.1.3 Summary (continued)

prepare for future growth and expansion, and provide redundancy to the existing fiber plant to support additional video and lecture capture projects. Component three includes Power over Ethernet (PoE) and non-PoE 10/100/1000 switches to provide connectivity to all data, wireless, phone and audio/visual equipment. Component four includes Voice over Internet Protocol (VoIP) phones needed to connect to the existing phone system, which will provide visual connections and allow for support calls and training to be conducted utilizing the desk phones. Component five upgrades the existing call manager servers as the current ones are scheduled to be end-of-support in 2014. Component six focuses on the library storage and transitions the Seminary to an on-site storage system, which eliminates the monthly charges for off-site hosting services and will provide 200 terabytes of data storage.

The combination of these critical components will significantly impact the style in which the Seminary conducts business, expand research opportunities, increase access to resources and further the Seminary as a leader in theological education. Quite simply, this infrastructure enhancement has tremendous benefits for all who study and work at Princeton Seminary in addition to those who wish to access its contents. By strengthening our converged technologies, the Seminary is better able to fulfill its core mission, focusing on teaching, learning and research and carrying out key aspects of its strategic plan by leveraging technology to better engage and enhance our institutional partnerships.

Princeton Seminary is primed to complete the second phase of its library project as the new library building is scheduled to open May 2013, at which point the Seminary will transition to phase three that will renovate the current Luce Library building and integrate its use into the

7.6.2.7 Selection Criteria (continued)

2. Improving and expanding educational opportunities for students: Currently, the Seminary hosts adult scholars and representatives of congregations from all parts of the State and nation for seminars, workshops and short courses and, for those more distant or unable to travel, webinars are offered on topics of faith. The existing Educational Media encompasses a wide variety of media equipment, support services, and facilities, including audiovisual assistance; audio and video recording services; videoconferencing; webcasting; web streaming; and personal consultation on the selection and use of technologies for curricular needs. The Seminary's Media Center features a combination listening/conference room, a production studio which is also equipped as a "smart classroom," soundproof audio narration booth, recording/editing/encoding stations, resource duplication stations, and campus cable TV system with local access channels. By upgrading these services can offer a change in the way religious and theological scholars, students and communities of interest work with texts.

3. Promoting academic research excellence, workforce readiness and the enhancement of the State's academic and economic competitiveness and prosperity by assisting in the production of a highly skilled workforce. As described briefly in the introductory paragraph of Section 5.2, graduates of Princeton Seminary join the State's workforce in an impressive variety of highly skilled professions. Graduates of the Seminary hold positions of leadership in careers that are not usually associated with a theological education. Currently, Seminary alumni/ae in New Jersey are engaged as faculty members in institutions of higher education, in corporate leadership, government, law, as physicians and health care workers, in social work and advocacy. **All that is to say, "A Seminary Education! It isn't just for pastors anymore!"**

EXHIBIT 15

Princeton Theological Seminary - Theological Institution

Accredited by: Middle States Association of Colleges and Schools & Association of Theological Schools

Carnegie Classification: Special Focus Institutions--Theological seminaries, Bible colleges, and other faith-related institutions

Website

Clicking on a CIP code will open another window with the description of a program assigned that code from the U.S. Department of Education's *Classification of Instructional Programs - 2010*.

<u>Degree Level</u>	<u>Degree</u>	<u>Program</u>	<u>CIP</u>
Master's	M.A.	Christian Education	<u>390401</u>
	Th.M.	Theological Professions	<u>390601</u>
Prof. Post-Mast.	M.Div.	Theology - First-Professional	<u>390602</u>
Doctoral	D.Min.	Theological Professions	<u>390601</u>
	Ph.D.	Theological Professions	<u>390601</u>

Source: NJ Higher Education Degree Program Inventory, 5/7/2013 10:20:45 AM