

Religious, Educational & Nonprofit Organizations

Highly knowledgeable about the unique challenges that these entities face, we respond to the myriad of legal issues that arise for a wide array of nonprofit and tax-exempt clients: religious organizations, colleges and universities, charter schools and other educational institutions, healthcare and social services agencies, and others serving the community.

Whether advising a religious institution on a sensitive church-state matter, counseling a charter school on a sophisticated real estate deal, or guiding a private foundation through a complex tax issue, our religious, educational and nonprofit organizations lawyers have the experience needed to resolve matters effectively and in line with clients' missions. Providing a holistic approach, we collaborate across our litigation, employment, ERISA and employee benefits, corporate, real estate, intellectual property, and trusts and estates teams to comprehensively support clients' needs.

In addition to their legal acumen, our lawyers bring practical knowledge and a stakeholder's perspective to operational and financial issues developed through their volunteer work on the boards of colleges, universities, nonprofits and religious organizations, enabling us to better serve our clients with tailor-made solutions.

Our Services

Restructuring and Governance

Our lawyers advise directors, trustees and officers about the best ways to organize and operate to accomplish their missions. We draft and implement structures and policies in conformance with state and federal nonprofit law and religious doctrine requirements. Whether the matter concerns finding the right structure or structures; managing daily risk associated with the mission, including protecting vulnerable persons served by our clients; or sorting out relationships inside and outside client entities, we understand these unique problems and assist clients in finding solutions.

- Asset management
- Bylaws
- Codes of ethics and conduct
- Complex corporate transactions
- Rights and claims under Religious Freedom Restoration Act (RFRA), Religious Land Use and Institutionalized Persons Act (RLUIPA), Family Educational Rights and Privacy Act of 1974 and other state and federal laws
- Formation
- Governance policies and procedures
- Internal investigations
- International restructuring
- Public communications

Tax Exemption

Complying with the law, obtaining and maintaining tax-exempt status and overcoming the difficulties of operating as a tax-exempt entity require counsel who know the ins and outs of the tax code.

- Charitable contributions
- Exemption application process
- Group rulings/exemptions
- Payments in lieu of taxes (PILOTs)
- Unrelated business income tax

ERISA, Employee Benefits and Employment

Our ERISA and employee benefits practice deals with the problems and opportunities nonprofit and religious institutions experience with pension and other employee benefit plans and practices. We design new plans and draft plan amendments, advise on tax, administrative and regulatory compliance issues and secure rulings and opinion letters from the Internal Revenue Service and the U.S. Department of Labor concerning plan exemptions from the Employee Retirement Income Security Act (ERISA) for qualified “church plans.”

Litigation

With experience at the trial and appellate levels in state and federal courts across the United States, our trial lawyers regularly litigate complex civil matters, employment-related matters, civil rights cases and constitutional appeals. We have successfully tried cases before judges, juries, arbitrators and administrative officers, and have protected our clients’ constitutional rights from government encroachment. We also routinely prepare amicus curiae briefs when our clients’ interests are implicated in litigation involving other parties.

Our team of litigators has evaluated, litigated and ultimately settled scores of abuse claims across the country. Where appropriate, we have participated in mass mediation processes, and we are skilled in using that process to obtain settlements on favorable terms. As part of our advocacy, we regularly assist our nonprofit clients in a periodic review and update of policies and procedures, consult with them on checking the backgrounds of applicants and volunteers, and provide training and consultation to educate children and their parents about ways to detect abuse and prevent it from occurring. When an incident occurs, we work closely with our clients to implement best practices to prevent a recurrence.

We litigate claims related to:

- First Amendment issues, including free speech and free exercise
- Civil rights and discrimination
- Employment and ministerial exceptions
- Land use
- Misconduct, abuse and harassment
- Title IX and student misconduct matters

Real Estate

We regularly appear before zoning and planning agencies and before city government agencies regarding taxation issues, licenses, zoning, and land-planning and property tax exemption issues at the local, state and federal levels. Our public finance lawyers regularly represent borrowers, lenders, underwriters and letter of credit providers and serve as bond counsel regarding tax-exempt bond and note transactions for various types of 501(c)(3) organizations. We have helped universities, hospitals, elementary schools, YMCAs and other nonprofit entities finance their expansion and capital improvement projects and refinance existing debt. Our team handles all aspects of financing and development transactions for various educational institutions, negotiating and drafting a variety of financing documents and grants through government agencies on behalf of

colleges and universities.

Representative Matters

- Represented the Mann Center for the Performing Arts, a nonprofit performing arts center based in Philadelphia, in its 12-year naming rights sponsorship agreement with Highmark Health. The agreement will rebrand the outdoor music destination as the Highmark Mann Center for the Performing Arts.
- Defended religious organizations' right of self-governance in litigation and regulatory matters.
- Advised many religious organizations regarding federal laws including the Religious Freedom Restoration Act (RFRA) and the Religious Land Use and Institutionalized Persons Act (RLUIPA).
- Planned and implemented organizational and management issues for diverse religious organizations to integrate their religious principles into various civil structures to protect assets and to organize risk and liabilities; and to protect the expectations of religious leaders, congregants and the public.
- Represented a religious organization in a long-term lease and management arrangement for more than a dozen cemeteries. The deal, one of the first of its kind in the country, is expected to generate significant revenue for the religious organization.
- Securing the dismissal of more than 100 alleged abuse cases brought against nonprofit institutions in Arizona, Delaware, Iowa, Louisiana, Minnesota, Mississippi, New Mexico, North Carolina, Pennsylvania, Rhode Island and South Dakota.
- Structuring and negotiating partnership arrangements between tax-exempt 501(c)(3) organizations and for-profit entities to ensure that the interests of the tax-exempt organizations were protected and to ensure compliance with various IRS rulings and court cases relating to joint ventures.
- Successfully defending a church in a church tax inquiry relating to its alleged violation of the electioneering prohibition applicable to 501(c)(3) organizations.
- Represented Temple University in a significant victory in the U.S. District Court for the Eastern District of Pennsylvania. The court granted summary judgment to Temple on all the plaintiff's discrimination claims, entering judgment in Temple's favor and ending the case without the need for a trial.
- Advised Saint Joseph's University on a \$7 million suit arising from actuarial malpractice and the University's pension plan, which was settled for less than six figures.
- Representing the Archdiocese of Philadelphia in several tax-exempt financings, the most significant of which was a \$30 million public bond issue for construction of the new Bishop Shanahan High School.

Publications

Portfolio 484-3rd: Tax Issues of Religious Organizations

Bloomberg Law

February 17, 2026

Supreme Court Tells States to Question Regulations—Not Religions

Bloomberg Law

June 9, 2025

Affirmative Action Is a Matter of Faith for Religious Institutions

January 12, 2024

Experience

Stradley Ronon Represents Mann Center in Naming Rights Sponsorship Agreement with Highmark

Stradley Ronon advised the Mann Center for the Performing Arts, a nonprofit performing arts center based in Philadelphia, in its 12-year naming rights sponsorship agreement with health insurer Highmark Health (d/b/a Highmark Blue Shield). The agreement, announced October 15, will rebrand the outdoor music destination as the Highmark Mann Center for the Performing Arts. The sponsorship agreement also extends to the community programs that the center sponsors every year.

This is the fourth naming rights agreement Stradley Ronon has handled for the center since 2019. The agreement was announced at a groundbreaking celebration of the center's \$70 million capital campaign to transform its physical campus ahead of its 50th anniversary next year.

Stradley Ronon Secures Win for Colgate University Student in Title IX Case

Through a collaborative, cross-practice effort, Stradley Ronon has secured a complete acquittal for a Colgate University student facing alleged Title IX and student conduct violations. Following a detailed investigation and contested hearing, a panel rejected the allegations and found there was not a preponderance of the evidence to establish any of the three alleged Title IX violations or the three corresponding student conduct violations.

Our team was able to show via cross-examination that the Title IX complaint was retaliatory in nature and the testimony elicited at the hearing demonstrated that the allegations were entirely without merit and the delayed accusations were simply not credible.

Redevelopment Project in Stone Harbor

Stradley Ronon represented the Sisters, Servants of the Immaculate Heart of Mary (IHM) with a redevelopment project in Stone Harbor, New Jersey. A 250-bed retreat house with 4.5 acres of beachfront views owned by IHM was demolished, and a new retreat house was constructed on a smaller lot allowing for the creation of 13 beach-block residential lots and a new street within the boundary of the original property. The sale of the high-profile lots provided funding for demolishing the existing building, creating a new retreat house and establishing an endowment to support the future needs of the congregation.

The Stradley Ronon team navigated the complex town zoning board requirements, received CAFRA permitting from the state Department of Environmental Protection, negotiated with the contractor, potential developers and residential lot buyers and resolved a dispute with the Borough of Stone Harbor regarding the developability of land adjacent to dunes.

Stradley Ronon Secures Victory in Third Circuit for Temple University

The Third Circuit sided with Stradley Ronon's client, Temple University, wherein the plaintiff alleged race discrimination under Title VII of the Civil Rights Act and violations of the Family and Medical Leave Act. A three-judge panel affirmed the District Court's judgment and held that the lower court did not err by allowing Temple University to use evidence discovered after the plaintiff's termination. The Third Circuit found that such evidence was relevant to rebutting the plaintiff's testimony at trial and held that the District Court's jury instructions were sufficient.

Discrimination Claim Win for Temple University

Stradley Ronon secured summary judgment for Temple University in the Eastern District of Pennsylvania for an age and disability discrimination matter. The plaintiff was terminated when he refused to return to work. He claimed he was denied reasonable accommodations for his position and argued that a younger person replaced him. The Court agreed with the arguments provided by Stradley Ronon's litigation team and dismissed all claims against Temple University.

Successful Motion To Dismiss on First Amendment Grounds for the Archdiocese of Military Services

Stradley Ronon represented the Archdiocese of Military Services (AMS), which serves as the "ecclesiastical endorser" for chaplains in military bases, Veterans Administration (VA) hospitals and foreign service sites around the globe, and Archbishop Broglio in a case where the plaintiff had his permission to serve as a chaplain revoked by AMS. In a well-reasoned opinion, the U.S. District Court for the District of Columbia granted a motion to dismiss on First Amendment grounds with prejudice and without leave to amend.

Temple University Victorious in Eastern District

Stradley Ronon represented Temple University in a significant win in *Branch v. Temple Univ., et al.* The matter involved a Plaintiff, who brought race claims under Section 1981 and Title VII for his discipline and termination against Temple and two individual defendants. The Plaintiff also claimed a violation of his FMLA rights and retaliation under all of the statutes. The trial

involved over 15 witnesses and over 200 documentary and video exhibits. The Stradley litigation team had five days of trial, and the jury deliberated for six hours before returning a complete defense verdict on all counts.

Temple University Wins in Eastern District

Stradley Ronon represented Temple University in a significant victory in the U.S. District Court for the Eastern District of Pennsylvania. The Court granted summary judgment to Temple on all of plaintiff's discrimination claims, entering judgment in Temple's favor and ending the case without the need for a trial. Importantly, plaintiff's argument that Temple should be precluded from offering declarations from any Temple employees as evidence in support of its motion for summary judgment, describing those witnesses as "interested" in an attempt to suggest bias, was squarely rejected by the Court which noted that plaintiff's argument ran counter to current Third Circuit precedent.

Community College of Philadelphia Wins in the Third Circuit

Stradley Ronon attorney Danielle Banks secured a significant victory in the U.S. Court of Appeals for the Third Circuit for the Community College of Philadelphia. The plaintiff, an adjunct professor who works at CCP, claimed that he was not promoted to a full-time position as a result of discrimination on the basis of race, gender, and his combined race and gender by the two final decision makers hiring for the position.

Banks filed a motion for summary judgment, arguing that the plaintiff's claim failed because he could not establish that he was qualified for the position. Although the plaintiff had advanced through three rounds of interviews, the final decision makers ultimately discovered that he lacked the necessary credits to qualify for the position.

Judge Quinones Alejandro agreed with Stradley Ronon's argument and determined that the plaintiff failed to state a discrimination claim. Stradley Ronon vigorously opposed the plaintiff's motion for reconsideration, which was denied. In the plaintiff's subsequent appeal to the U.S. Court of Appeals for the Third Circuit, Banks again argued that the district court had correctly ruled in CCP's favor, based on the relevant record evidence. The court agreed with all of the points made in the district court's opinion and affirmed summary judgment for CCP.

Stradley Remodels L'Arche Civil Framework

Stradley is helping L'Arche, an international faith-based organization that supports people who have intellectual disabilities, develop a set of civil structures that will serve as a framework for the group's spiritual principles.

Archdiocese for Military Services Vindicated In MSPB Claim

Stradley represents the Archdiocese for the Military Services, USA, which serves as the "ecclesiastical endorser" for chaplains in military bases, Veterans Administration (VA) hospitals and foreign service sites around the globe. The Military Services and the VA ask religious "endorsers" to vouch for chaplain candidates who, on hiring, become government employees. A chaplain recently discharged by the VA filed before the Merit Systems Protection Board, which in prosecution of that claim was asked to subpoena certain records and testimony from the Archdiocese concerning internal Archdiocesan information.

Stradley resisted the discovery arguing that any ecclesiastical process was off limits in the civil arena under the First Amendment. After briefing and a hearing, our team was victorious, and the Administrative Law Judge agreed to quash the requested subpoena in a short but definitive order vindicating the Archdiocese on every point.