

---



# LIBERTY COUNSEL

---

**DISTRICT OF COLUMBIA**  
109 Second Street NE  
Washington, DC 20002  
Tel 202-289-1776  
Fax 407-875-0770  
LC.org

**FLORIDA**  
PO Box 540774  
Orlando, FL 32854  
Tel 407-875-1776  
Fax 407-875-0770

**VIRGINIA**  
PO Box 11108  
Lynchburg, VA 24506  
Tel 407-875-1776  
Fax 407-875-0770  
Liberty@LC.org

**REPLY TO FLORIDA**

July 20, 2023

**Via Email Only:**

Roxann Wedegartner,  
Mayor  
City of Greenfield  
195 Federal St. Suite 100  
Greenfield, MA 01301  
roxwed1@gpsk12.org

Greenfield School  
Committee  
Greenfield Public Schools  
195 Federal St. Suite 100  
Greenfield, MA 01301  
schoolcom@gpsk12.org

Christine DeBarge,  
Superintendent,  
Greenfield Public Schools  
195 Federal St. Suite 100  
Greenfield, MA 01301  
chrdeb1@gpsk12.org

**Re: Unlawful Failure to Approve Church School Application**

Dear Mayor Wedegartner, Superintendent DeBarge, and School Committee Members:

Liberty Counsel represents Providence Moldovian Baptist Church (“Church”) and its nascent school, Providence Christian Academy (“Church School”). As you know, School Committee Member Elizabeth Ann Deneve, and her colleagues on the Greenfield School Committee (“Committee” or “GSC”) who voted consistent with her outrageous and illegal comments, have unlawfully failed to approve the application of the Church School based on its sincerely-held religious beliefs, and based on the religious beliefs the Church intends to teach its Church School students via the nationally-known and recognized [Abeka](https://www.abeka.com/)<sup>1</sup> Christian school curriculum. This violates both Massachusetts and federal law.

We are sending you this letter as a final attempt to resolve this issue and vindicate the clear rights of our clients without judicial intervention. **Time is of the utmost essence and urgency, because the new school year is about to start, and the Church School will be irreparably damaged if approval is not granted immediately.** Your prompt response and corrective action are required **on or prior to August 10, 2023**, to forestall further legal proceedings. Since the rights of the Church and its School are clearly established, if Liberty Counsel files suit, that suit will be filed against the Greenfield Public Schools (“GPS” or “District”) and against certain individual Committee members in both their official and individual capacities.

---

<sup>1</sup> <https://www.abeka.com/>

**A. Who We Are and What We Do.**

Liberty Counsel is a national non-profit litigation, education, and public policy organization with an emphasis on First Amendment liberties, and a particular focus on religious freedom.

In 2020 and 2021, our groundbreaking lawsuits coast-to-coast freed houses of worship in numerous states, including Kentucky, Illinois, Maine, Virginia, and California, from discriminatory COVID-19 restrictions. Several of these cases reached the United States Supreme Court and resulted in injunctions prohibiting discriminatory COVID-19 restrictions on religious worship. For example, our case against California and its Governor Gavin Newsom resulted in a permanent injunction against them, *see Harvest Rock Church, Inc. v. Newsom*, 141 S. Ct. 1289 (2021), and a subsequent final judgment requiring them to pay Liberty Counsel **\$1,350,000** in attorney's fees and costs. *See Harvest Rock Church, Inc. v. Newsom*, No. 2:20-cv-06414, C.D. Cal. (May 14, 2021).

You may have also read recently in the national press about our 9-0 unanimous Supreme Court victory against the City of Boston, in connection with its religious discrimination against Christians, in *Shurtleff v. City of Boston*, 142 S. Ct. 1583 (2022). (*See, e.g.*, Adam Liptak, *Supreme Court Rules Against Boston in Case on Christian Flag*, New York Times (May 2, 2022) <https://www.nytimes.com/2022/05/02/us/supreme-court-boston-flag-free-speech.html>).

What was not as widely reported, however, was that in the **five years** that it took us to obtain the ultimate victory, we “lost” that particular case no fewer than four separate times in the lower courts, including twice before two unanimous panels at the First Circuit Court of Appeals. We **never** tire, however, and we **never** give up. On the day after the SCOTUS decision, the front page of the *Boston Herald* featured this apt headline:



Following the “Supreme Spanking,” the City of Boston recently paid Liberty Counsel more than **\$2,100,000** in attorney’s fees for the five years’ worth of legal fees and costs it required us to invest to bring it to justice. Ironically, at the outset of that controversy in 2017, Boston likewise received a pre-suit letter like the one you are now receiving, but rejected the opportunity to resolve the matter when it would have cost nothing.

**Please do not make the same costly mistake. We wish to resolve this matter quickly and without cost to you, but that can only happen if we receive your positive response and corrective action on or prior to August 10, 2023.**

**B. Background Facts: Greenfield School Committee’s Discrimination.**

Providence Moldovian Baptist Church desires to establish its Church School to support local parents who wish to provide a private Christian education for their children. The Abeka Christian school curriculum to be used by the Church School is accredited by the Florida Association of Christian Colleges and Schools (FACCS) and the Middle States Association of Colleges and Schools Commissions on Elementary and Secondary Schools (MSA CESS).<sup>2</sup> Full accreditation of Abeka through FACCS provides additional national and state recognition with the National Council of Private School Accreditation (NCPSA), which is a consortium of accrediting associations for the recognition of early childhood, elementary, and secondary private schools, and serves as a national review panel for the standards and review procedures of private school accrediting associations.<sup>3</sup>

For more than 130 years, the MSA CESS has accredited early-childhood through post-secondary institutions throughout the United States and in more than 85 countries around the world. The MSA CESS is recognized by national and international communities as a leader in both improving the quality of education through the accreditation process and affirming to the public the trustworthiness of its accredited members.

In Massachusetts alone, at least 30 private Christian schools have been approved to use, and are already using, Abeka’s curriculum. At least 7,600 schools throughout the United States and more around the world are also using Abeka. In addition to private Christian schools, thousands of homeschooling parents use Abeka for their children’s education, including many who were approved to do so in Greenfield.

Quite clearly, there are no legitimate concerns about the efficacy, rigor, or sufficiency of the Abeka curriculum. Any purported concerns raised by the Committee are clearly pretextual and a thin veil for animus and discrimination against the religious beliefs and teachings of the Church School.

---

<sup>2</sup> <https://www.msa-cess.org/>

<sup>3</sup> <https://www.abeka.com/abekaacademy/comparison.aspx>

Here, the Church School has provided all pertinent information that the Committee has requested, in accordance with Massachusetts law. The Committee, however, has not fulfilled its obligations. Instead of approving the Church School's application at the Committee meeting on July 12, 2023, Committee member Deneeve used her position to air her strange personal beliefs, and to falsely disparage, malign, and misrepresent Providence Christian Academy and the curriculum it intends to use. Here are some of Ms. Deneeve's outrageous and unlawful comments:

Providence Christian Academy is not a grassroots local school. This is a franchise that teaches fundamentalist ideology throughout the world.

They use the Abeka Curriculum, which I believe is in direct opposition to the values of GPS. The curriculum is full of false information and students who learn from it have a harder time getting into four-year colleges and universities because they will believe a whole set of things that are erroneous and be historically illiterate, which I think is a bad thing for our community and our country, and ultimately this is going to be reflected in a real breakdown in the separation of church and state, which is really the agenda of these curricula.

In the Abeka textbook *America: Land I Love*, Satan is blamed for the spread of the theory of evolution and modern psychology; it is taught in the "Civil War" section that black slavery was just cheaper than indentured servitude, and slaves were immigrants.

In the science textbook, we learn that we must reject any scientific ideas that contradict the Bible, and there was only one Ice Age, and it lasted a couple of hundred years after Noah's flood.

The "History" section will teach us that the Great Depression was created by socialists to destabilize patriotic Americans, and the LGBTQ issues are listed under "United States History, Heritage of Freedom, and Christian Perspectives Cultural Decay" section, saying traditional American family values have dramatically declined, and when the traditional heterosexual family comes under attack, all of society suffers.

Schools that use Abeka have come under scrutiny for expelling students who are LGBTQ or the children of LGBTQ parents. Abeka is the founder of the Pensacola Christian College and has been fined \$44 million by the IRS for lying about being a nonprofit. They've had to apologize for their racist past because they didn't allow interracial relationships. They outlawed dancing.

Condoning this is owning it, and this is an example of educational malpractice that has been widely researched and studied, and I could not say that I support the youth in our community—I would not be an ally or a supporter of young people—if I voted to allow the school into our community.

Greenfield Public Schools, *Greenfield School Committee Meeting - July 12, 2023*, YOUTUBE (July 12, 2023), <https://www.youtube.com/watch?v=zNMYDulB9dM>.

Setting aside the numerous fallacies and scandalous misrepresentations espoused by Ms. Deneeve, the religious beliefs which she maligned and denigrated have been espoused in mainstream Christianity for thousands of years, and by Providence Moldovian Baptist Church since its inception. These beliefs do not constitute valid grounds for GSC to deny the Church School's application.

As to some of Ms. Deneeve's false claims, the Church School is indeed a "grassroots local school" made up of students and their parents (some of whom attend Providence MBC or other local churches); and is not a "franchise." Moreover, one of the undersigned lawyers actually learned to read using the Abeka curriculum, graduated from university and law school, and can personally attest that Ms. Deneeve's irrational fears and phobias are baseless (*i.e.*, "students who learn from it have a harder time getting into four-year colleges and universities because they will believe a whole set of things that are erroneous and be historically illiterate"). Perhaps some of Ms. Deneeve's fears may be justified—that students at the Church School will not be indoctrinated with Ms. Deneeve's false view of reality, and that parents will have other educational choices outside of [failing public schools](#)<sup>4</sup> under leadership that does not respect the First Amendment. Such fears, however, are not a lawful basis for denying the Church School's application.

After Ms. Deneeve expressed her anti-religious views, the Committee tabled further action on, and failed to approve, the Church School's application on the basis of its religious beliefs and its choice of a well-established Abeka curriculum. The Committee failed to note any substantive issues with the Abeka curriculum that would harm the State's interest in public education. Absent any evidence or basis (other than the religious animus on full display at the meeting), the Committee discussed pretextual ways to potentially decline the Church School's application. In that discussion, however, the Committee indicated that the Abeka program is approved in Greenfield for home school students. **If that is the case, and if the 30 or so prospective students of the Church School are approved to learn from the Abeka program individually at home, then the Committee has no rational basis for denying these students the fundamental right to learn collectively from that same curriculum at the Church School.**

Through its actions and now inaction, the Committee has unlawfully discriminated against the Church based on animus toward religious viewpoints.

**C. Greenfield School Committee Has Flagrantly Violated Massachusetts Law.**

As you are well aware, Massachusetts law provides that "school committees **shall approve** a private school when satisfied that the instruction in all the studies required by law equals in

---

<sup>4</sup> Public School Review, <https://www.publicschoolreview.com/massachusetts/greenfield-school-district/2505490-school-district> (last visited July 19, 2023) ("Greenfield School District, which is ranked within the bottom 50% of all 395 school districts in Massachusetts (based off of combined math and reading proficiency testing data) for the 2020-2021 school year.")

thoroughness and efficiency, and in the progress made therein, that in the public schools in the same town; **but shall not withhold such approval on account of religious teaching . . .**” Mass. Ann. Laws ch. 76, § 1 (emphasis added).

Moreover, the Committee may not impose requirements upon the Church School that are “not essential to the State interest in ensuring that all the children shall be educated.” *Care & Prot. of Charles*, 399 Mass. 324, 337-40, 504 N.E.2d 592, 600-02 (1987). The Committee is permitted to consider only a handful of well-defined factors, specifically (1) the curriculum, (2) the number of hours of instruction, (3) the qualifications of the teachers, (4) the learning materials, and (5) standardized testing. *Id.*

The Committee likewise may not deny the Church School’s application based on the personal opinions or preferences of its members about the curriculum, or the manner in which the curriculum is taught. Rather, the Committee must determine whether the curriculum covers the types of subjects taught in public schools. *See id.* at 338-39, 504 N.E.2d at 601. Those subjects are “instruction and training in orthography, reading, writing, the English language and grammar, geography, arithmetic, drawing, music, the history and constitution of the United States, the duties of citizenship, health education, physical education and good behavior.” *Id.* at 338, 504 N.E.2d at 601. The “thoroughness and efficiency” standard does not allow the Committee to unilaterally impose a secular religion in the instruction and upbringing of children against the desires of parents. The “object of these provisions of the statutes has been that all children shall be educated, not that they shall be educated in any particular way.” *Id.* at 336, 504 N.E.2d 600. Children are not creatures of the state, and they belong to their parents, not the state.

As to the number of hours of instruction, Massachusetts’s Student Learning Time laws do not apply to private schools, which means that denial on such a basis is improper. The Committee may consider the planned total number of hours that students are educated at the Church School as evidence of the thoroughness and efficiency of the proposed program.

The Committee may consider the qualifications of the Church School’s teachers, but the only requirement is that they be “of competent ability and good morals.” Mass. Gen. Laws ch. 71, § 1. The Supreme Judicial Court of Massachusetts expressly rejected the notion that the Committee could require that private school teachers have specific degrees or teaching certifications. *Id.* at 339, 504 N.E.2d at 601.

Regarding the Church School’s learning materials, the Committee may only use them to consider them in relation to “the type of subjects to be taught and the grade level of the instruction.” *Id.* at 339, 504 N.E.2d at 602. The Committee “may not . . . dictate the manner in which the subjects will be taught.” *Id.*

Finally, the Committee may consider standardized testing or progress reports of Church School students to “ensure educational progress and the attainment of minimum standards.” *Id.* at 339-40, 504 N.E.2d at 602. However, such testing is not explicitly required by law, and many private schools in the area do not use standardized testing. Be that as it may, the Church School intends to use Iowa standardized tests. Superintendent DeBarge stated at the Committee meeting

that Iowa standardized tests are approved as sufficient for other schools. No basis exists to deny the Church School the same benefit.

**D. Greenfield School Committee Has Flagrantly Violated the First Amendment.**

**1. Parents (Not the Committee) Have the Right to Direct Their Children's Education.**

The U.S. Supreme Court has recognized that the “**primary role of the parents in the upbringing of their children,**” is “**now established beyond debate as an enduring American tradition.**” *Wisconsin v. Yoder*, 406 U.S. 205, 232 (1972) (emphasis added). The law is clear that parents have the right to direct the upbringing and associations of the parents’ own children. “The fundamental theory of liberty upon which all governments in this Union repose excludes any general power of the State to standardize its children. . . **The child is not the mere creature of the State;**” *Pierce v. Society of Sisters*, 268 U.S. 510 (1925) (emphasis added). “The history and culture of Western civilization reflect a strong tradition of parental concern for the nurture and upbringing of their children.” *Yoder*, 406 U.S. at 232.

**2. The Committee Cannot Discriminate Based on Religious Viewpoint.**

The Supreme Court and various federal courts have confirmed that nonprofit organizations providing education or character training from a religious viewpoint may not be subjected to discrimination on the basis of their religious viewpoint. *See Good News Club v. Milford School District*, 533 U.S. 98 (2001), and progeny: *Hills v. Scottsdale Unified School District*, 329 F.3d 1044 (9th Cir. 2003); *Child Evangelism Fellowship v. Montgomery County*, 373 F.3d 589 (4th Cir. 2004); *Child Evangelism Fellowship of Minnesota v. Minneapolis Special Sch. Dist. No. 1*, 690 F.3d 996, 1003-04 (8th Cir. 2012). *See Shurtleff v. City of Bos., Massachusetts*, 142 S. Ct. 1583 (2022).

**3. The Committee Cannot Exercise Unbridled Discretion to Deny First Amendment Rights.**

Unbridled discretion arises when administrative decisions (and any additional conditions) are left wholly to administrator discretion. It is improper for a decision-maker to exercise unfettered discretion to burden or ban approvals, because “without standards governing the exercise of discretion, a government official may decide who may speak and who may not based upon the content of the speech or view-point of the speaker.” *City of Lakewood v. Plain Dealer Publ’g Co.*, 486 U.S. 750, 763–64 (1988). The prohibition on unbridled discretion is a constant in constitutional analysis. *See CEF of Maryland*, 457 F.3d 376, 386 (2006). This has been a matter of consensus among the courts of appeals. *Id.* at 386–87 (citing *Atlanta Journal & Constitution v. City of Atlanta Dep’t of Aviation*, 322 F.3d 1298, 1306–07, 1310–11 (11th Cir.2003); *DeBoer v. Village of Oak Park*, 267 F.3d 558, 572–74 (7th Cir.2001); *Lewis v. Wilson*, 253 F.3d 1077, 1079–80 (8th Cir.2001); *Sumnum v. Callaghan*, 130 F.3d 906, 919–20 (10th Cir.1997); *Sentinel Commc’ns Co. v. Watts*, 936 F.2d 1189, 1200 n. 11 (11th Cir.1991)).

The unbridled discretion inquiry is “not a static inquiry, impervious to context;” if a policy “does not provide sufficient criteria to prevent viewpoint discrimination,” then it “generally will not survive constitutional scrutiny.” *Child Evangelism Fellowship of S.C. v. Anderson Sch. Dist. Five*, 470 F.3d 1062, 1069 (4th Cir. 2006) (internal quotations and alterations omitted). *See also Bell v. City of Winter Park, Fla.*, 745 F.3d 1318, 1324 (11th Cir. 2014) (“A grant of unrestrained discretion to an official responsible for monitoring and regulating First Amendment activities is facially unconstitutional”) (internal citations omitted). “[A] government official cannot have unbridled discretion to decide who may engage in protected activities.” *Perry v. Los Angeles Police Dep’t*, 121 F.3d 1365, 1370 (9th Cir. 1997).

#### **4. The Committee Cannot Prescribe A Secular Orthodoxy.**

It is now axiomatic that “if there is any fixed star in our constitutional constellation, it is that no official, high or petty, can prescribe what shall be orthodox in politics, nationalism, religion, or other matters of opinion or force citizens to confess by word or act their faith therein.” *W. Virginia State Bd. of Educ. v. Barnette*, 319 U.S. 624, 642 (1943). “[I]t is not, as the Court has repeatedly held, the role of the State or its officials to prescribe what shall be offensive.” *Masterpiece Cakeshop, Ltd. v. Colorado C.R. Comm’n*, 138 S. Ct. 1719, 1731 (2018) (internal citations omitted).

#### **5. The Committee Cannot Prevent the Church or its Parents From Speaking And Associating.**

As these and many other cases illustrate,

the First Amendment protects an individual’s right to speak his mind regardless of whether the government considers his speech sensible and well intentioned or deeply “misguided,” *Hurley*, 515 U. S., at 574, 115 S.Ct. 2338, and likely to cause “anguish” or “incalculable grief,” *Snyder v. Phelps*, 562 U. S. 443, 456, 131 S.Ct. 1207, 179 L.Ed.2d 172 (2011). **Equally, the First Amendment protects acts of expressive association.** *See, e.g., Dale*, 530 U. S., at 647–656, 120 S.Ct. 2446; *Hurley*, 515 U. S., at 568–570, 579, 115 S.Ct. 2338. Generally, too, **the government may not compel a person to speak its own preferred messages.** *See Tinker v. Des Moines Independent Community School Dist.*, 393 U. S. 503, 505–506, 89 S.Ct. 733, 21 L.Ed.2d 731 (1969); *see also, e.g., Miami Herald Publishing Co. v. Tornillo*, 418 U. S. 241, 256, 94 S.Ct. 2831, 41 L.Ed.2d 730 (1974); *Wooley v. Maynard*, 430 U. S. 705, 714, 97 S.Ct. 1428, 51 L.Ed.2d 752 (1977); *National Institute of Family and Life Advocates v. Becerra*, 585 U. S. —, —, 138 S.Ct. 2361, 2371, 201 L.Ed.2d 835 (2018) (NIFLA). Nor does it matter whether the government seeks to compel a person to speak its message when he would prefer to remain silent or to force an individual to include other ideas with his own speech that he would prefer not to include. *See Hurley*, 515 U. S., at 568–570, 576, 115 S.Ct. 2338; *see also Rumsfeld v. Forum for Academic & Institutional Rights, Inc.*, 547 U. S. 47, 63–64, 126 S.Ct. 1297, 164 L.Ed.2d 156 (2006) (*FAIR*) (discussing cases). **All that offends the First Amendment just the same.**



*303 Creative LLC v. Elenis*, 143 S. Ct. 2298, 2312 (2023) (emphasis added).

### **LEGAL DEMAND**

As shown above, the Committee's failure to approve the Church School's application is unlawful, and will subject GPS to significant liability if not immediately remedied. We would very much prefer to resolve this dispute without further legal proceedings. Although we have already invested a significant amount of time and resources in this matter, we are willing to resolve the matter without any payment for Liberty Counsel's extensive fees and costs to date. **After August 10, 2023**, however, any settlement or resolution will necessarily involve the payment of our costs and legal fees, separate and apart from the damages payable to our clients.

We are confident that, should GPS require us to vindicate our clients' clear rights through litigation, the front-page headlines of *The Recorder* will be equally (and appropriately) embarrassing for GPS and the Committee as the *Boston Herald* headline was for the City of Boston last year. (*See Supreme Spanking, supra.*)

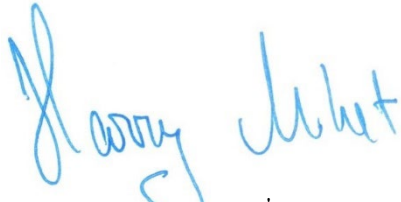
Therefore, to forestall further proceedings, we must receive written confirmation from GPS, prior to the close of business **Thursday, August 10, 2023**, that Greenfield Public Schools has:

1. approved the Church School; and
2. will refrain from engaging in any discrimination, retaliation, or adverse action against the Church School on the basis of its religious beliefs.

If we do not receive a favorable response from the Committee by the above deadline, we will understand that GPS is unwilling to resolve this matter without legal intervention, and we will proceed accordingly without further notice, including without limitation: filing a civil complaint with the Massachusetts Attorney General for the Committee's flagrant and willful violation of Mass. Ann. Laws ch. 76, § 1; filing a complaint against GPS, the Committee, and certain of its members in their official and personal capacities in the U.S. District Court for the District of Massachusetts; and taking other appropriate action to prevent irreparable harm to the rights of the Church and the Church School.

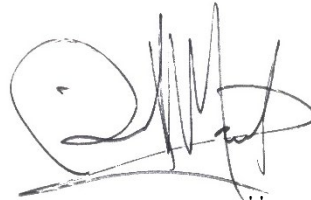
[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

Please govern yourselves accordingly. Time is of the essence.



Horatio G. Mihet<sup>†</sup>  
Vice President of Legal Affairs  
LIBERTY COUNSEL

Sincerely,



Richard L. Mast<sup>††</sup>  
Senior Litigation Counsel  
LIBERTY COUNSEL

c.

Ryan McLane, Esq.<sup>†††</sup>

**GPS School Committee**

Roxann Wedegartner, Mayor

Jean Wall

Amy Proietti, Chair

Susan Eckstrom, Secretary

Glenn Johnson-Mussad

Kathryn Lynn Martini, Vice Chair

Elizabeth Ann Deneeve

[schoolcom@gpsk12.org](mailto:schoolcom@gpsk12.org)

[roxwed1@gpsk12.org](mailto:roxwed1@gpsk12.org)

[jeawall@gpsk12.org](mailto:jeawall@gpsk12.org)

[amypro1@gpsk12.org](mailto:amypro1@gpsk12.org)

[suseck1@gpsk12.org](mailto:suseck1@gpsk12.org)

[glejoh1@gpsk12.org](mailto:glejoh1@gpsk12.org)

[katmar2@gpsk12.org](mailto:katmar2@gpsk12.org)

[eliden1@gpsk12.org](mailto:eliden1@gpsk12.org)

**Greenfield City Council**

Philip Elmer

Christine Forgey

Penny Ricketts

Michael Terounzo

Katherine Golub

Daniel J. Guin

Virginia DeSorgher

John Bottomley

Marianne Bullock

Sheila Gilmour

Jasper Lapienski

Doug Mayo

Derek Helie

[councilor.elmer@greenfield-ma.gov](mailto:councilor.elmer@greenfield-ma.gov)

[councilor.forgey@greenfield-ma.gov](mailto:councilor.forgey@greenfield-ma.gov)

[councilor.ricketts@greenfield-ma.gov](mailto:councilor.ricketts@greenfield-ma.gov)

[councilor.terounzo@greenfield-ma.gov](mailto:councilor.terounzo@greenfield-ma.gov)

[councilor.golub@greenfield-ma.gov](mailto:councilor.golub@greenfield-ma.gov)

[councilor.guin@greenfield-ma.gov](mailto:councilor.guin@greenfield-ma.gov)

[councilor.desorgher@greenfield-ma.gov](mailto:councilor.desorgher@greenfield-ma.gov)

[councilor.bottomley@greenfield-ma.gov](mailto:councilor.bottomley@greenfield-ma.gov)

[councilor.bullock@greenfield-ma.gov](mailto:councilor.bullock@greenfield-ma.gov)

[councilor.gilmour@greenfield-ma.gov](mailto:councilor.gilmour@greenfield-ma.gov)

[councilor.lapienski@greenfield-ma.gov](mailto:councilor.lapienski@greenfield-ma.gov)

[councilor.mayo@greenfield-ma.gov](mailto:councilor.mayo@greenfield-ma.gov)

[councilor.helie@greenfield-ma.gov](mailto:councilor.helie@greenfield-ma.gov)

---

<sup>†</sup>Licensed in Ohio and Florida

<sup>††</sup>Licensed in Virginia

<sup>†††</sup>Licensed in Massachusetts