

June 13, 2018

**SENT VIA EMAIL AND U.S. MAIL:
Mandy.Cohen@dhhs.nc.gov**

Dr. Mandy K. Cohen
Secretary
N.C. Dept. of Health and Human Services
101 Blair Drive
Raleigh, NC 27603

Re: Unconstitutional appropriation to religious ministry

Dear Secretary Cohen:

We are writing on behalf of the Freedom From Religion Foundation (FFRF) and the Center for Inquiry (CFI). FFRF and CFI are national educational nonprofit organizations that strive to uphold the constitutional separation between church and state.

Our organizations were contacted by several concerned North Carolina taxpayers about an unconstitutional appropriation of a quarter of a million dollars to a religious ministry in the state's currently proposed budget. The budget allocates \$250,000 of HHS's budget to Cross Trail Outfitters "for purposes of promoting wellness and physical activity for youth seven to 20 years of age."¹

Cross Trail Outfitters (CTO) is a Christian ministry that promotes Christianity through outdoor activities. CTO's mission statement is "Guiding the next generation to Christ through the outdoors."² CTO's first stated goal is to "build a relationship with boys ages 7–20 and lead them to Christ or a better understanding of Him. To equip youth to passionately pursue a lifetime of service to Jesus Christ and fellowship with Him through the outdoors." CTO's website includes a picture of two adults performing a baptism on a child.³ CTO describes itself as "an independent, inter-denominational ministry," and a video on the ministry's website shows an adult CTO leader instructing children to remove their hats to pray before leaving on their hunting trip.⁴ A 14-year-old boy in the same video explains that he enjoys CTO because "it involves my two favorite things, God and hunting," and that CTO has

¹ N.C. S.B. 99 at 72–73.

² teamcto.org/about.

³ See enclosure.

⁴ teamcto.org/about.

helped him “become a better Christian.”⁵ CTO’s summer program promises that attendees will “learn Bible truths.”⁶ Testimonials from North Carolina parents of the group further confirm that CTO’s activities in North Carolina are heavily religious.⁷

Put simply, CTO openly uses hunting and fishing trips in order to proselytize children in the hopes of converting them to their version of Christianity. There is no indication that CTO abandons its stated goals and mission by offering any secular activities.

North Carolina’s discretionary \$250,000 grant to CTO to directly fund its religious mission violates the Establishment Clause of the First Amendment to the U.S. Constitution. We request that you honor your oath to uphold the Constitution by refusing to disburse these funds.

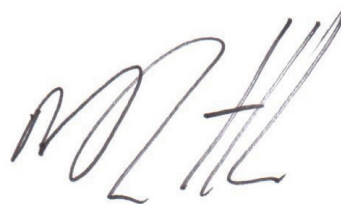
The Establishment Clause of the First Amendment prohibits the government from financially supporting religious activities. *See, e.g., Comm. For Pub. Educ. And Religious Liberty v. Nyquist*, 413 U.S. 756, 778–79 (1973) (striking down government-subsidized maintenance and repair of nonpublic schools); *Lemon v. Kurtzman*, 403 U.S. 602, 625 (1971) (holding that government aid to nonpublic education impermissibly entangled the government with religion, even when limited to secular subjects). CTO’s outdoor activities—the activities that the legislature specifically decided to fund—are unabashedly religious in nature. There is no question that these taxpayer funds will be used to promote religion.

FFRF and CFI request written assurances that your office will refuse to disburse any funds to Cross Trail Outfitters. Please respond in writing with the steps taken to resolve this matter so that we may notify our complainants that this issue has been resolved. Given the time-sensitive nature of this matter, we request a response within seven days. If we do not hear from you by then, we plan on pursuing a federal court order prohibiting your office from disbursing these funds.

Sincerely,



Rebecca S. Markert
Legal Director
Freedom From Religion Foundation



Nicholas J. Little
Legal Director
Center for Inquiry


Enclosure

RSM:NJL:rdj

⁵ *Id.*

⁶ teamcto.org/summer-camps.

⁷ teamcto.org/about/testimonials. *See* enclosure.



**CROSS TRAIL
OUTFITTERS** *of North Carolina*
YOUTH HUNTING & FISHING CLUB


CTO
Store

Home
NC Chapters
KY Chapter
VA Chapter
NC Event Calendar
Donate

Be a Part of Team CTO North Carolina!

There's a life out in God's creation, and Cross Trail Outfitters (CTO) is all about "Guiding the next generation to Christ through the outdoors." We provide the mentorship, training and assets for kids to go hunting and fishing, while ensuring a wholesome and fun environment in which participants can grow in knowledge and reverence of God. CTO is primarily for boys ages 7-20, offering a wide range of year-round outdoor activities. There are also opportunities for families and girls to participate in some CTO activities. To get plugged in find a CTO chapter near you or check out our events calendar to see what all is happening around the state.

Become a Member



Upcoming events

SESSION 1- 2018 ULTIMATE SUMMER CAMP

June 10, 2018 • Blackduck Island/Oregon Fishing Inlet, NC

CATAWBA RIVER BASIN JUNE FAMILY NIGHT

June 12, 2018 6:00 PM • The Gathering Place @467 Dover Rd. Kings Mountain 28086

CATAWBA RIVER BASIN STRIPER FISHING TRIP

June 13, 2018 4:00 AM • Lake Murray, SC

SESSION 2- 2018 ULTIMATE SUMMER CAMP

June 17, 2018 • Blackduck Island/Oregon Fishing Inlet, NC

TRIAD SPORTSMAN'S NIGHT

North Carolina Chapters

- **Ahoskie**
- **Ashe County**
- **Catawba River Basin**
- **Craven-Pamlico**
- **Crystal Coast**
- **Foothills**
- **Greenville Pink (Girls)**
- **Hyde County**
- **Lake Norman**
- **Manteo**
- **Outer Banks**
- **Piedmont**
- **Pungo River**
- **Roanoke**

TESTIMONIALS

MARY ANN - NC

“ Our son Cole has been blessed to have been touched by the men of CTO who share their love for the Lord and the great outdoors. He has attended 2 summer camps and weekend retreats. he was re-baptized during his first camp and came home with a renewed spirit and love for God. He has found a great bond with the leaders and loved every minute he has spent with each of you. Cole recently attended a hunt in which he didn't see a deer, however said he was deeply moved by the leader who housed the trip. The time these men take to share their hearts and faith brings much more to these young men than words can express. We feel a great sense of pride knowing that an organization such as CTO is available for Cole to continue to grow in the book and spirit with men of great faith.”

MARY ANN - NC

MARK - NC

“ My son, Seth went last year and it was his first camp of any kind away from home. He did not know the other 11 boys when we arrived at Oregon Inlet on Sunday afternoon. When he returned to the dock to be picked up the following Thursday he was hugging these boys and sharing a genuine friendship for each other based on what God had done through the week. He was able to reconnect with 2 of them this past Saturday at the CTO swan hunt and they picked up just like they just left the island. While on the island, Seth was stretched and challenged in his walk with the Lord. He had questions and shared things around the camp fire that week that brought him to a greater understanding of what a relationship with Jesus means instead of just having a knowledge of Him. This will all come to fruition when he is baptized at the end of the January. Not only did he meet God on that island, it was just a great week of doing cool things. Going offshore fishing, gigging flounder, finding clams, learning how to call ducks from the 3 time NC state duck call champion, how to set up a duck blind and decoys are just some of the activities he enjoyed. I give CTO summer camp my highest recommendation..”

Mark- NC

ALAN - NC

“ CTO has impacted Jacob, my son, in many ways. Jacob is a 13 yr old child that is very gifted in many ways. However, I am not a hunter and so he has learned a great life long skill of hunting that can be used and shared for generations to come. Mr. Tom Harrison and Mr. Mack Williams among many other great men have influenced my son in hunting and with fellowship. CTO in Plymouth, NC has encouraged Jacob to put God first in all of his endeavors. Jacob does not like to miss a meeting if at all possible. My son has many friends that attend this great organization and he has made more friends, as well. Great job CTO staff and thank you all for what you do.”

ALAN - NC

A MOM - NC

“ As a single mom I often worried about my son having strong male influences. He has been with CTO since it began in Plymouth & has grown so many ways. He is closer to God and gave his heart to God last year. Though he is a child and still makes mistakes, I have seen such a positive change in him. He even witnessed to one of his friends at my house because she said she wasn't saved. My son has a deep love for hunting and fishing and never wants to miss a CTO meeting because of all they teach. He comes home telling me about how to use a turkey call, setting traps, cleaning deer, etc. Thank you CTO for all you do for our youth!”

A MOM - NC