

# Pepple & Waggoner, Ltd.

ATTORNEYS AT LAW

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March 16, 2018

## VIA EMAIL ONLY

Mr. Christopher Line  
Freedom From Religion Foundation  
P.O. Box 750  
Madison, WI 53701

Re: Indian Creek Local School District  
Our File No. 894-1-18

Dear Mr. Line:

This law firm represents the Indian Creek Local School District Board of Education (the "District"). This correspondence is in regard to the letters you sent to the District on March 6, 2018 (the "First Letter"), and on March 9, 2018 (the "Second Letter") (collectively the "Letters"). Please allow this correspondence to serve as the District's response to your Letters.

In your First Letter, you raised issue with the distribution of shoes and socks at one of the District's schools. As your First Letter acknowledges, your Organization agrees that the distribution of shoes and socks is laudable. When the event was organized, the District was not fully aware of the event's "foot washing" component but was interested in having shoes and socks distributed to students in need. Understanding the event more fully now, the District has determined that the event will not be on school grounds or during the school day. Consistent with this, the event will not occur during the school day on school grounds. As the District is not affiliated with the event, it will not select - nor control - the event's new venue nor the event's activities.

In your Second Letter, you raised issue with a student group's lunch activities. As your Second Letter suggests, the activities relate to Fellowship of Christian Athlete ("FCA"). However, your Second Letter appears to overstate Mr. Bobbyjon Bauman's affiliation with FCA. The District will meet with Mr. Bauman to ensure he understands the District's legal obligations and acts in accordance with all applicable laws. Additionally, the District will be reviewing the parameters of the Establishment Clause, the Free Exercise Clause, the Equal Access Act, and other laws with administrators and applicable staff. To further facilitate this effort, the District has requested that I provide guidance to the District. Through these efforts, the District will continue to ensure that religion is neither promoted nor inhibited.

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I trust this adequately responds to the concerns which you have raised in your letter. If you should have any questions, please do not hesitate to contact me.

Very truly yours,



Donna M. Andrew

DMA/nr

cc: Dr. T.C. Chappellear, Superintendent (via email)