

# FREEDOM FROM RELIGION *foundation*

P.O. BOX 750 · MADISON, WI 53701 · (608) 256-8900 · WWW.FFRF.ORG

January 25, 2016

**SENT VIA EMAIL AND U.S. MAIL:  
susan.hastings@squirepb.com**

Ms. Susan C. Hastings, Esq.  
Squire Patton Boggs  
4900 Key Tower  
127 Public Square  
Cleveland, OH 44114

Re: Religious promotion on social media

Dear Ms. Hastings:

I am writing on behalf of the Freedom From Religion Foundation. We appreciate your assistance in resolving several state/church separation issues in Dalton Local Schools in the past. Regretfully, another issue has come to our attention.

A concerned local citizen informed us that the profile for Dalton Local Schools' superintendent Twitter feed (@Dalt\_Supt)<sup>1</sup> begins, "A Christian! A new Supt, focusing on being the LIGHT in a challenging world." The account regularly posts messages with religious content, including:

- Specific references to god, such as "What an amazing way to end a Concert!! In His presence!!" (12/7/15);
- Calling for prayer, such as "Pray our Kindergarten students have a wonderful Christmas Program tonight!!!" (12/7/15);
- Promoting a belief in god, such as "God Bless America" (7/4/15 and 5/25/15);
- "Amen!!" in response to the quote, "Good leaders must first become good servants" (6/26/15);
- Promoting Christian literature, such as the book, "Lead...For God's Sake" (8/4/15);
- Promoting Christian church events, such as "Trunk or Treat" (10/25/15) and "Missions at the Airport" (9/22/15); and
- Many references to blessings and prayers, such as "I pray you have a Blessed Day" (11/26/15).

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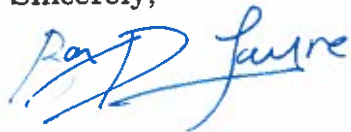
<sup>1</sup> [https://twitter.com/dalton\\_supt](https://twitter.com/dalton_supt).

Anyone viewing this school-sponsored Twitter feed would understand that the superintendent is endorsing his personal religion over all others. We are writing to request assurances that, in the future, all District social media accounts will remain neutral on matters of religion, as is required by the First Amendment of the U.S. Constitution. We also request that the District deletes the above posts and the religious references in the account's profile.

As you are aware, public schools may not advance, prefer, or promote religion. *See generally Lee v. Weisman*, 505 U.S. 577 (1992); *Wallace v. Jaffree*, 472 U.S. 38 (1985); *Epperson v. Arkansas*, 393 U.S. 97 (1967); *Sch. Dist. of Abington Twp. v. Schempp*, 374 U.S. 203 (1963); *Engel v. Vitale*, 370 U.S. 421 (1962). It is inappropriate and unconstitutional for District administrators to promote religion in general, or Christianity specifically, while acting in their official capacity as a District representative. When the superintendent posts on the "@Dalt\_Supt" Twitter account, he is speaking on behalf of the District.

Please investigate this matter at your earliest convenience. We would appreciate a written response detailing the steps taken to remedy this violation so that we may notify our complainant.

Sincerely,

A handwritten signature in blue ink that reads "Ryan D. Jayne". The signature is fluid and cursive, with the first name "Ryan" and last name "Jayne" clearly legible.

Ryan D. Jayne, Esq.  
*Diane Uhl Legal Fellow*  
*Freedom From Religion Foundation*