

FREEDOM FROM RELIGION *foundation*

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

February 8, 2018

SENT VIA EMAIL AND U.S. MAIL:
ssavagli@kUSD.edu

Dr. Sue Savaglio-Jarvis
Superintendent
Kenosha Unified School District
3600 52nd Street
Kenosha, WI 53144

Re: Multiple constitutional concerns at Kenosha USD

Dear Superintendent Savaglio-Jarvis:

I am writing on behalf of the Freedom From Religion Foundation to alert you to constitutional violations at Roosevelt Elementary School. FFRF is a Wisconsin-based national nonprofit organization with 30,000 members across the country, including more than 1,300 in Wisconsin. FFRF's purposes are to protect the constitutional principle of separation between state and church, and to educate the public on matters relating to nontheism.

Several concerned District parents contacted us to report several instances of Roosevelt Elementary School staff promoting Christianity. First, [REDACTED] 4th-grade enrichment classroom includes multiple displays that promote religion in general, and Christianity in particular. Images of these displays are enclosed and include:

- A Latin cross hanging over a whiteboard;
- A poster promoting devotional Christian music by Chris Tomlin, including song titles and lyrics such as "You stand in the fire beside me," "Praise the God of Cavalry," and "worship";
- A poster that says, "IN GOD WE TRUST" and "BLESSED IS THE NATION WHOSE GOD IS THE LORD," with an accompanying biblical citation (Psalm 33:12); and
- A poster listing columns of "vices" and "virtues," filled with the words of Galatians 5:20–23¹.

¹ ". . . hatred, discord, jealousy, fits of rage, selfish ambition, dissensions, factions and envy . . . those who live like this will not inherit the kingdom of God. But the fruit of the Spirit is love, joy, peace, forbearance, kindness, goodness, faithfulness, gentleness and self-control." (NIV)

We understand that [REDACTED] also displayed a separate Latin Cross in her classroom earlier this school year, but removed it after a parent complained.

We also understand that [REDACTED] taught a lesson based on Martin Luther King, Jr. Day that included teaching her class that God spoke to Moses through a burning bush, a reference to the biblical story in Exodus 3:1–4:17. We are informed that [REDACTED] justification for this religious lesson was that Harriet Tubman was the “Moses of her people,” and that [REDACTED] insisted that this was a district-approved lesson.

There is an undeniable Christian theme in [REDACTED] classroom decorations and instruction. We request that you investigate these concerns and remove all of the above displays immediately, as well as any other religious displays in [REDACTED] classroom. We also request assurances that [REDACTED] will not use her position as a school district employee to promote her personal religion in the future through classroom decorations, religious education, or otherwise.

Second, we understand that KUSD students at several schools regularly attend field trips to Timber-lee Christian Center (also known as “Camp Timber-lee,”) a recreational camp run by Timber-lee Ministries, whose stated mission is to “create engaging communities where each young person encounters Christ . . .” While we understand that the camp offers secular activities to public school students, it offers religious instruction as well.

For instance, while the camp does not take public school students through the seven-room “Creation Walk,” with each room correlated to one of the Bible’s seven days of creation, “Timber-lee staff can present facts about creation to them, encouraging them to look for ways to interpret the material besides what they’ve learned in school.”² Indeed, a 2006 Newsweek article quoted Timber-Lee’s outdoor education director as saying, “The [science] curriculum is designed to open [students]’ eyes so when they go back to school [and hear about evolution] they say, ‘Oh, that sounds goofy!’”³ Students at the camp are also encouraged to attend Timber-lee’s week-long summer camp, which is openly religious.⁴

We wrote to your predecessor in 2012 detailing the overtly evangelical nature of the Timber-lee Christian Center and the problems with holding District-sponsored events there. That letter is enclosed for your review.

² See enclosed letter.

³ Available at newsweek.com/beliefwatch-camping-darwin-or-not-112773.

⁴ See, e.g., timber-lee.com/index.php/resources/tour (video description of summer camp at 0:10) (“It’s just, like, a refreshing experience to come here and have a whole week where you’re immersed in God’s creation and, like, you get to talk about his word day and night.”).

It appears extremely likely that Kenosha USD students receive instruction that undermines, rather than reinforces, the District's requirement to teach accurate biological science to its students, including evolution. Kenosha USD should not offer school-sponsored trips to religious centers like Timber-Lee. At a minimum, parents should be clearly informed of Timber-lee's evangelical and anti-science mission before agreeing to send their children on a District-sponsored trip to the camp. Additionally, the District must not promote Timber-lee's religious summer camp in any way.

Finally, we understand that there are several other specific instances of the District promoting Christianity that we request you investigate and address as appropriate. We are informed that a wall at Pleasant Prairie Elementary School included artwork depicting the biblical Noah's Ark story (Gen. 5–10), and that the Roosevelt Elementary School library includes a "Child's Christian Bible," but no other religious texts. We request assurances that District schools do not include religious artwork and that District libraries do not favor religious texts of any one religion over others.

Religious displays must be removed from classrooms and school walls.

The District violates the Constitution when it allows its schools to display religious symbols or messages. Public schools may not advance, prefer, or promote religion. *See 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). [REDACTED] religious classroom decorations violate this basic constitutional prohibition by creating the appearance that the District prefers religion over nonreligion, and Christianity over all other faiths. The religious artwork at Pleasant Prairie Elementary School is similarly impermissible.

Courts have continually held that school districts may not display religious messages or iconography in public schools. *See, e.g., Stone v. Graham*, 449 U.S. 39 (1980) (ruling that the Ten Commandments may not be displayed on classroom walls); *Lee v. York County*, 484 F.3d 689 (4th Cir. 2007) (ruling that a teacher may be barred from displaying religious messages on classroom bulletin boards); *Washegesic v. Bloomington Pub. Schs.*, 33 F. 3d 679 (6th Cir. 1994) (ruling that a picture of Jesus may not be displayed in a public school).

Please note that it is no defense that "teachers [do not] shed their constitutional rights to freedom of speech or expression at the school house gate," *Tinker v. Des Moines Indep. Sch. Dist.*, 393 U.S. 503, 506 (1969), which we understand [REDACTED] has relied on in the past due to a misleading

memorandum from the American Center for Law & Justice, an extremist religious law firm. *Tinker* did not involve any Establishment Clause concerns, and federal courts have upheld restrictions and limitations on the free speech rights of teachers and other public school employees because of their roles as government employees. See, e.g., *Pickering v. Bd. of Educ.*, 391 U.S. 563, 568 (1968) (“[T]he State has interests as an employer in regulating the speech of its employees that differs significantly from those it possesses in connection with regulation of the speech of the citizenry in general.”). This interest in restricting speech is even stronger in the context of a public school where employees interact with minor school children. See *Lee v. York Cnty. Sch. Div.*, 484 F.3d. 687, 695 (4th Cir. 2007) (“Courts have generally recognized that the public schools possess the right to regulate speech that occurs within a compulsory classroom setting, and that a school board’s ability in this regard exceeds the permissible regulation of speech in other governmental workplaces or forums.”).

This religious display is particularly inappropriate given that about 38% of Americans born after 1987 are not religious.⁵ The display alienates those nonreligious students, families, teachers, and members of the public whose religious beliefs are inconsistent with the message being promoted by the school.

Kenosha USD must not allow or promote religious instruction.

Public schools may not provide religious instruction. In the seminal Supreme Court case on this issue, *McCullum v. Bd. Of Educ.*, 333 U.S. 203 (1948), the Court held that that bible classes in public school were unconstitutional. The school district in *McCullum* allowed religious teachers, employed by private religious groups, to teach students a weekly bible class. The Court held, “Here not only are the state’s tax-supported public school buildings used for the dissemination of religious doctrines. The State also affords sectarian groups an invaluable aid in that it helps to provide pupils for their religious classes through use of the state’s compulsory public school machinery. This is not separation of Church and State.” *Id.* at 212. [REDACTED] biblical lesson about God speaking to Moses through a burning bush violates this principle, particularly given the religious decorations in her classroom.

Further, the anti-evolution instruction at Timber-lee Christian Center is deeply concerning. Sending students to a creationist camp under the guise of a “science trip” further gives the appearance that the District views creationism as “science,” which it is not. Courts have routinely found that such teachings are religious, despite many new and imaginative labels given

⁵ Robert P. Jones & Daniel Cox, *America’s Changing Religious Identity*, PUBLIC RELIGION RESEARCH INSTITUTE (Sept. 6, 2017), available at www.prrri.org/wp-content/uploads/2017/09/PRRI-Religion-Report.pdf.

to them. The Supreme Court struck down teaching of “scientific creationism” in public schools. *Edwards v. Aguillard*, 482 U.S. 578 (1987).

Evolution, like gravity, is a scientific fact. Teaching that there is a scientific controversy about the validity of evolution is akin to teaching astrology with astronomy or alchemy beside chemistry. Representing unconstitutional discarded misconceptions as scientific facts does a great disservice to the scientific literacy of Kenosha USD students. No controversy exists in the scientific community regarding the fact of evolution, and exposing students to alternative theories or a controversy is not only inappropriate and dishonest, it is unconstitutional. Time and again courts exposed these alternative theories as an attempt to foist religious beliefs onto vulnerable schoolchildren, often after a costly legal battle.

The District should not send students to Timber-lee Christian Center unless it confirms that the camp promotes real biological science. If it does continue to sponsor school-sponsored trips to the camp, it should inform students of the camp’s evangelical mission. Finally, the District must not promote the camp’s religious week-long summer camp in any way.

Conclusion

Religion is a divisive force in public schools. The Supreme Court has repeatedly noted that “[s]chool sponsorship of a religious message is impermissible because it sends the ancillary message to members of the audience who are nonadherents ‘that they are outsiders, not full members of the political community, and an accompanying message to adherents that they are insiders, favored members of the political community.’” *Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290, 309 (2000) (quoting *Lynch v. Donnelly*, 465 U.S. 668, 688 (1984) (O’Connor, J., concurring)).

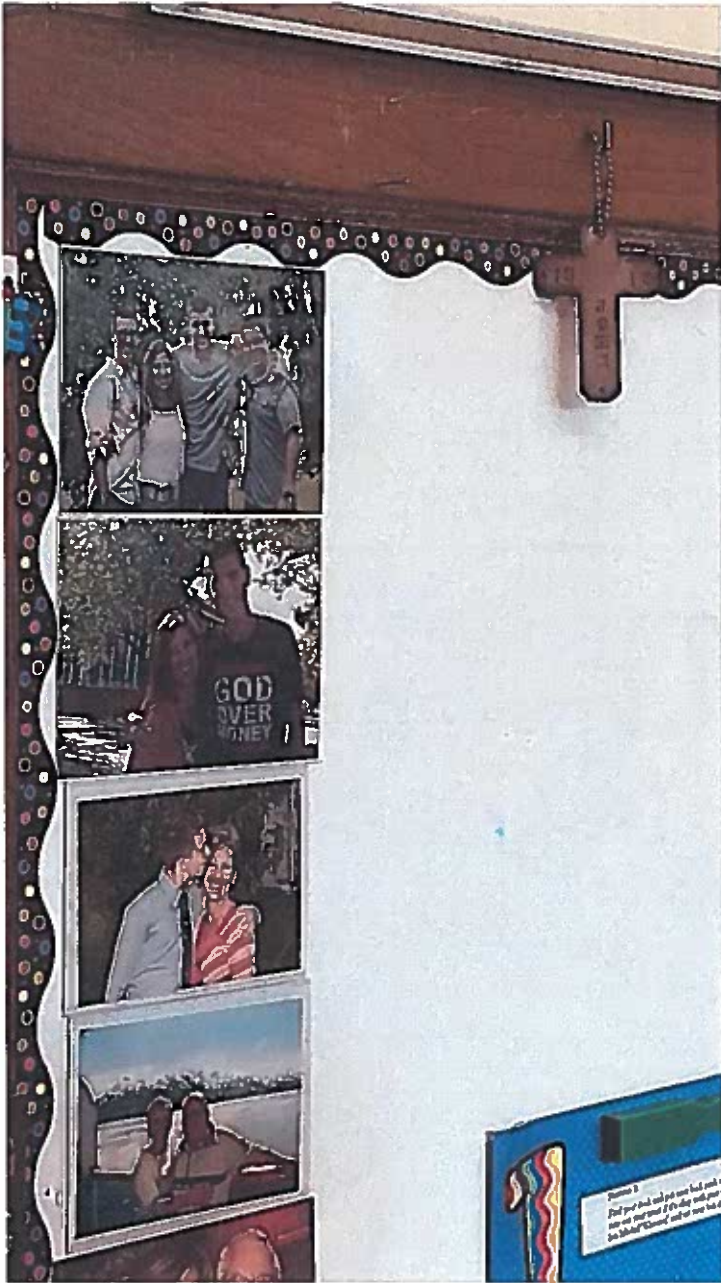
There appears to be a disturbing trend of allowing blatantly proselytizing messages at Kenosha USD, even after parents have complained. We request a response in writing with assurances that all religious displays discussed above will be removed, and that the District will not permit or promote religious instruction during class time or at school-sponsored trips. Thank you for your attention to these important matters.

Sincerely



Ryan D. Jayne
Staff Attorney

Enclosures





To live
your thoughts a little
higher,
--- Speak Hope, Speak Love, Speak Life ---

Vices	virtues
Hatred	Love
Anger	Joy
Jealousy	Kindness
Selfish Ambition	Goodness
Envy	Gentleness
Chating	Self-control
Greed	Discipline
Stealing	Patience
Lying	Order
Disorder	

Vices are: Evil, Destructive, Easy to ignite, Difficult to stifle, Self-centered.

Virtues are: Good, Productive, Difficult to ignite, Easy to stifle, Self-giving, Liberating and restful, Uplifting and gives, Inspires life.

Award Board 210

FREEDOM FROM RELIGION *foundation*

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

February 28, 2012

SENT BY MAIL AND EMAIL TO mhancock@kUSD.edu

Dr. Michele Hancock
Superintendent of Kenosha Unified School District
Educational Support Center
3600 52nd St.
Kenosha, WI 53144

Re: Public School Field Trips to Christian Center

Dear Superintendent Hancock:

I am writing on behalf of the Freedom From Religion Foundation (FFRF), including Wisconsin members, who object to public schools taking students on field trips to Timber-lee Christian Center (Christian Center or Center). A concerned parent brought this matter to our attention. FFRF is a nationwide nonprofit organization, which works to protect the constitutional principle of separation of church and state. FFRF represents more than 19,000 members across the country including more than 1,400 in Wisconsin. We object to Kenosha Unified School District ("District"), taking public school students to a Christian Center.

It is our understanding that at least three schools in your district conduct field trips to Timber-lee Christian Center. We understand that Keith Robinson, the orchestra director at Indian Trail High School & Academy, regularly takes his students to the Center. Mr. Robinson is also a member of the Creation Science Society of Milwaukee (www.cssmwi.org), which hosted a "creation science seminar" at the Center on October 1, 2011. Mr. Robinson delivered two of the talks at the seminar. It is our information that Harborside Academy's "Outward Bound/Adventure Club Mentor Training," held from October 8 to October 10, 2012, was held at the Center. We also understand that the fifth grade class and orchestra at Jeffery Elementary School have planned field trips to Timber-lee Christian Center.

We realize that this District may not be aware of the religious nature and goals of Timber-lee Christian Center. It is possible that the District has even received assurances that the Center's programs will be secular in nature — our investigation reveals otherwise. We have included endnotes and attachments of all our evidence so that you may view it for yourself.

The District has a constitutional obligation to ensure that their programs "do not inculcate religion." *Lemon v. Kurtzman*, 403 U.S. 602, 619 (1971). This obligation includes not teaching creationism, intelligent design, or any of their creatively named religious offspring to public school students. Doing so is unconstitutional. *See Edwards v. Aguillard*, 482 U.S. 578, (1987); *McLean v. Arkansas Bd. of Ed.*, 529 F.Supp. 1255 (D.C.Ark., 1982) ("balanced treatment for creation science and evolution science" violates Constitution); *Kitzmiller v. Dover Area Sch. Dist.*, 400 F.Supp. 2d 707 (M.D. Pa 2005) (teaching intelligent design is like teaching creationism — unconstitutional). There are also serious constitutional issues with public schools organizing and coordinating funding to religious entities. These trips provide hundreds and even thousands of dollars to Christian Center.

First, taking public school students to a center whose self-professed goal is to convert children to a particular religion and undermine what is taught in public school science classrooms is inappropriate. Public schools may not advance 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 Twshp. v. Schempp*, 374 U.S. 203 (1963); *Engel v. Vitale*, 370 U.S. 421 (1962). Second, it is unacceptable to expose a captive audience of impressionable students to the overtly religious atmosphere of this camp. Third, that the field trips are theoretically voluntary does not mitigate the constitutional violation. I will address each of these issues in turn.

“Outdoor Education” is a “non-threatening” front for inculcating Christianity

Timber-lee Christian Center lures public schools with fun activities and promises of learning, but its goal is to inculcate Christianity, not teach science. Timber-lee Christian Center’s slogan is “[t]o be an agent of the holy spirit in transforming today’s youth into followers of Christ,”¹ and the Center takes this goal seriously. Karen Good, an outdoor educator there, equates outdoor education to evangelizing, declaring “outdoor education is a ministry in itself.”² Good openly admits the subversive purpose behind the Center’s “education” program: “[p]eople who wouldn’t come through your ministry door will saunter through your education door, because nature is not threatening.”³

Karen Good also admits deliberately undermining science education: “The curriculum is designed to open [students’] eyes so when they go back to school and hear about evolution they say, ‘Oh, that sounds goofy!’”⁴ Good injects creationism into her lessons in not-so-subtle ways: “I use phrases like, ‘This animal was designed to...’ this leads kids to ask questions.”

The “Science Education Center,” where public school students go during their outdoor education programs, “creatively and effectively develops a sense of God’s wonder in tens of thousands of young people each year.”⁵ It contains a seven-room “Creation Walk,” with each room “showcas[ing] one of the Bible’s seven days of Creation.”⁶ While “public school students skip some aspects of the program such as the creation walk, the Timber-lee staff can present facts about creation to them, encouraging them to look for ways to interpret the material besides what they’ve learned in school.”⁷

Mike Manke, director of the Science Education Center, asks a rhetorical question that perfectly illustrates the Center’s focus is on religion, not science: “Where else but in Christian camping can you talk about a Creator as well as show the kids firsthand what He’s done?”⁸

Unfortunately, it appears that some public schools select this Christian Center *because* of its ability to bring children to Christ. Rich Ammentorp, a third- and fourth-grade former public school teacher, brought “thousands of students to Timber-lee,” because it “provides an opportunity for many ‘lost’ individuals to experience the love of Christ through the relationships they build with the Christian staff at camps like Timber-lee.”⁹

Continuing field trips to this Center willingly herds children to a proselytizer’s paradise and undermines your own educational standards. The Center’s public school program is designed to “pull[] students back for a week for full-blown ministry in the summer,” when constitutional restraints are absent.¹⁰

The contract available on the Center’s website states that the “Evangelical Free Church Bible Conference” is “doing business as Timber-lee Christian Center” and wants to assure that all groups comply with its religious beliefs.¹¹ The terms of the contract include a “Statement of

Faith” requiring that any group “the mission of Timber-lee Christian Center and the Evangelical Free Churches of America Statement of Faith (enclosed).”¹² The Christian Center website proclaims, without exception, “It is the policy of Timber-lee Christian Center that all retreat groups be in alignment with our Statement of Faith.”¹³ Finally, the Center has certain “Expectations” requiring all “students, staff and chaperones that will be participating in [the] camp experience... show respect for Timber-lee’s mission,” with a request that readers then view the “Statement of Faith.”¹⁴

The “Statement of Faith” or “Doctrinal Statement,”¹⁵ which is in the Center’s contracts, policy, and “Expectations,” consists of ten points that are overwhelmingly and irrevocably Christian:

- 1) “We believe in One God...”
- 2) “We believe that God has spoken in the Scriptures...[and] the Bible is without error in the original writings...”
- 3) “We believe that God created Adam and Even in His image, but they sinned when tempted by Satan... Only through God’s saving work in Jesus Christ can we be rescued...”
- 4) “We believe that Jesus Christ is God incarnate...”
- 10) “We believe that God commands everyone everywhere to believe the gospel by turning to Him in repentance and receiving the Lord Jesus Christ. We believe that God will raise the dead bodily and judge the world, assigning the unbeliever to condemnation and eternal conscious punishment...”¹⁶

These unequivocal statements certainly indicate that Christian Center staff cannot possibly extricate themselves from the tenets, as they might argue. In fact, it is up to public schools to comply with this religious code: the Christian Center may “discontinue partnership with a group or organization based on their mission and statement of faith if it is deemed to be in conflict with Timber-lee’s.”¹⁷

Additionally, if all functions of the camp are centered around these points, it cannot be a welcoming atmosphere for nonreligious, polytheistic, Jewish, Muslim, Catholic or any other variety of faith or non-faith students that do are not fundamentalist Christians.

The Christian Center’s religious environment is inappropriate for public school children

The Christian Center ulterior and anti-public education goals are sufficient to halt District field trips. But even if the Center were to stop attempting to convert students, it is wrong for a public school to arrange field trips to an overtly religious place, such as a church or Christian Center.

In July, the 7th Circuit, of which Wisconsin is a part, issued a 7-3 decision prohibiting schools from having graduations in a church. “Regardless of the purpose of school administrators in choosing the location, the sheer religiosity of the space created a likelihood that high school students and their younger siblings would perceive a link between church and state. That is, the activity conveyed a message of endorsement.” *Doe ex rel. Doe v. Elmbrook Sch. Dist.*, 687 F.3d 840, 853 (7th Cir. 2012)(petition for cert filed Dec. 20, 2012).

The court continued, “True, the District did not itself adorn the Church with proselytizing materials, and a reasonable observer would be aware of this fact. But that same observer could reasonably conclude that the District would only choose such a proselytizing environment aimed at spreading religious faith... if the District approved of the Church’s message.” *Id.* at 853-54.

The Christian Center deliberately creates a church-like religious environment the *Elmbrook* Court warned about. The welcome sign is the first indication of this overtly religious atmosphere. It clearly states that this is not a camp, but a Christian Center: “Welcome to Timber-lee Evangelical Free Church Christian Center.”¹⁸

The campground itself is littered with Christian references and Bible quotations. Even something as benign as a set of outdoor stairs is imbued with religious significance: “The Steps of Righteousness represen[t] a different ‘step in the life of a Christian’ seeking to honor and please God in their life.” Users are instructed to claim an attribute as they ascend each of the 15 steps including prayer, purity, confession, salvation, forgiveness, and submission.¹⁹

Psalm 104:24 is cited and quoted on a wall in the welcome area of the Nature Center, “How many are your works Oh Lord; in wisdom you made them all. The earth is full of your creatures! Psalm 14:24.”²⁰ This quote exemplifies the Center’s ulterior motive: undermining biological sciences taught in public school with religious dogma.

Other interior walls of the Center’s buildings sport large Biblical verses including:

- Ecclesiastes 3:11²¹ - “He has made everything beautiful in its time. He has also set eternity in the human heart; yet no one can fathom what God has done from beginning to end.”
- Ephesians 2:10²² - “For we are God’s handiwork, created in Christ Jesus to do good works, which God prepared in advance for us to do.”
- Romans 5:8²³ - “But God demonstrates his own love for us in this: While we were still sinners, Christ died for us.”

The verses are not limited to building interiors, the horse paddock fence sports a plaque that cites and quotes Romans 6:23: “For the wages of sin is death, but the free gift of God is eternal life in Jesus Christ our Lord. Romans 6:23.”²⁴

At least two outside chalkboards are used to reinforce the Center’s outdoor education ministry. The board asks children, “In what ways have you seen God display His beauty this week?”²⁵ Many of the children answered “nature.” Another chalkboard asks “What’s a characteristic of God you’ve seen Him display this week?”²⁶

The Physical Discovery Room, featuring interactive displays about energy, waves, and electricity, also has a wall that boldly proclaims, in all capital letters, “GOD MADE IT FIRST.”²⁷ Arrows connect the text to images of the natural world, including a picture of the Earth.

The Center is also covered with “worship painting.”²⁸ Children “worship through visual art” and the art, often on paper or cardboard, is displayed all over the camp.²⁹ More permanent worship art is allowed, such as a permanently painted section of wall which features, for example³⁰:

- a cross and the words “When all is lost LEAN ON ME”
- in large letters at the top of the wall, “Edwin-Lee-♥’s God.”
- “Free hugs for Jesus”
- “I ♥ Jesus”
- “Transformed by the power of God through Jesus Christ”
- A cross
- Jesus Fish
- “Romans 12:2”

At the back of the outdoor amphitheater where many services are held (including chapel), there is a large chalkboard that is often covered with religious phrases and imagery.³¹ Though this

chalkboard could be cleaned for public school services, a video taken during Union Grove Elementary School's visit shows the word "Savior" written in extremely large letters was not removed.³² A closer look reveals that the large letters are made up of verses, likely biblical verses, and that "worship painting" is displayed off to the side of the giant chalkboard.³³

This is a small sampling of the religious atmosphere the Christian Center projects; it is inescapable. Public schools may not legally expose their students to a pervasively sectarian and proselytizing atmosphere.

Voluntariness does not excuse constitutional violations

The fact that field trips to the Christian Center are "voluntary" in that parents may technically refuse permission is not a valid safeguard. Courts have summarily rejected arguments that voluntariness excuses a constitutional violation. *See, generally, Lee v. Weisman*, 505 U.S. at 596 ("It is a tenet of the First Amendment that the State cannot require one of its citizens to forfeit his or her rights and benefits as the price of resisting conformance to state-sponsored religious practice."); *Abington Sch. Dist. v. Schempp*, 374 U.S. 203, 288 (1963) (Brennan, J., concurring) ("Thus, the short, and to me sufficient, answer is that the availability of excusal or exemption simply has no relevance to the establishment question..."); *Mellen v. Bunting*, 327 F.3d 355, 372 (4th Cir. 2003) ("... VMI cannot avoid Establishment Clause problems by simply asserting that a cadet's attendance at supper or his or her participation in the supper prayer are 'voluntary.'"). Moreover, it is unlikely that parents are fully informed about the religious goals and environment at the Christian Center.

The solution is simple: public school students may not be taken on field trips to Christian Centers that attempt to convert the young and impressionable. There are plenty of secular camps venues to reinforce what students learn in their science classes, not undermine those lessons. This solution also prevents public money or public institutions from sending money to a religious organization in violation of the Establishment Clause.

May we hear from you, in writing, at your earliest convenience, about the steps you are taking to ensure religious education is left to the private sphere not the public school?

Sincerely,



Andrew L. Seidel

Endnotes on following page
Attachments

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- ¹ Christian Camp and Conference Association website information on Timber-lee Christian Center, available at www.ccca.org/public/camps/campdetails.asp?i=30219&reload=name&campID=30219. Screenshot is Exhibit 3.
- ² Natalee Roth, "Liberating: How Timber-lee Christian Center draws kids to their Creator," *Christian Camp and Conference Association InSite*, (March/April 2006) page 11. Attached as Exhibit 1.
- ³ Roth *supra* note 2 at 11.
- ⁴ Rebecca Phillips, Dena Ross, "Beliefvatch: Camping," *Newsweek* (July 17, 2006), original brackets removed so as not to confuse with our brackets. Attached as Exhibit 2.
- ⁵ Roth *supra* note 2 at 6.
- ⁶ Phillips and Ross, *supra* note 4.
- ⁷ Roth *supra* note 2 at 7.
- ⁸ Roth *supra* note 2 at 8.
- ⁹ Roth *supra* note 2 at 10-11.
- ¹⁰ Roth *supra* note 2 at 11; original brackets removed so as not to confuse with our brackets.
- ¹¹ "Terms and Conditions for the Winterxtreme, Articblast, Jumpstart Contract," from Timber-lee Christian Center, available at www.timber-lee.com/cm/pdfs/refine-contract.pdf. Copy attached as Exhibit 4.
- ¹² *Id.*
- ¹³ Timber-lee Christian Center, "Policies and Forms," available at <http://www.timber-lee.com/retreats.cfm/group-retreats/policies-and-forms>. Screenshot attached as Exhibit 5.
- ¹⁴ Timber-lee Christian Center "Camp Expectations," available at <http://www.timber-lee.com/school-program.cfm/policies-and-forms/camp-expectations>. Screenshot attached as Exhibit 6.
- ¹⁵ *Id.*
- ¹⁶ Timber-lee Christian Center "Doctrinal Statement," available at <http://www.timber-lee.com/about-timber-lee.cfm/doctrinal-statement>. Screenshot attached as Exhibit 7
- ¹⁷ "Terms and Conditions" *supra* note 11.
- ¹⁸ Exhibit 8
- ¹⁹ Exhibit 9
- ²⁰ Exhibit 10
- ²¹ Exhibits 11 and 12, quotes from *NIV* Bible, not pictures.
- ²² Exhibit 13, quotes from *NIV* Bible, not pictures.
- ²³ *Id.*
- ²⁴ Exhibit 14
- ²⁵ Exhibit 15
- ²⁶ Exhibit 16
- ²⁷ Exhibit 17
- ²⁸ Exhibit 18
- ²⁹ Exhibits 19, 20, 21, 22 and 23.
- ³⁰ Exhibit 24
- ³¹ Exhibit 25
- ³² Exhibit 26
- ³³ *Id.*, video available at <http://www.youtube.com/watch?v=omPAaNFCpjM>

Exhibits attached