

FREEDOM FROM RELIGION *foundation*

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

November 2, 2018

SENT VIA EMAIL AND U.S. MAIL:
tmorris@wps60.org

Tom Morris
General Counsel
Waukegan Community Unit School District #60
1201 North Sheridan Road
Waukegan, IL 60085

Re: Promotion of religious ministry at Waukegan CUSD #60

Dear Mr. Morris:

I am writing on behalf of the Freedom From Religion Foundation regarding constitutional violations at Waukegan CUSD middle schools. FFRF is a national nonprofit organization with more than 32,000 members across the country, including over 900 members in Illinois. Our purposes are to protect the constitutional principle of separation between state and church, and to educate the public on matters related to nontheism.

A concerned local community member contacted FFRF to report that a local religious ministry, Yoked Mentoring Program, and an affiliated ministry, Plan, Purpose and Promises Mentoring Program, have been recruiting students for their religious programs at school-sponsored events at Miguel Juarez Middle School and Robert Abbott Middle School.

The Yoked Mentoring Program takes place at a Christian church and is openly religious in nature. A flier for the program, posted on the group's Facebook page (copy enclosed), states that "Yoked is a faith based mentoring program," and includes six biblical citations.

We understand that Miguel Juarez and Robert Abbott Middle Schools allowed representatives of the Yoked ministry to promote their program to students during the school day or during school-sponsored events. Enclosed Facebook posts show the group promoting their visits to the schools, including during a back-to-school event at Miguel Juarez where the school appears to have allowed the ministries to erect a table with literature and representatives to sign students up for the faith-based mentorship program.

An advertisement for this event (copy enclosed) includes the Yoked logo and indicates that students could pick up their new class schedules at the event.

The school district's partnership with the Yoked Mentoring Program and the Plan, Purpose and Promises Mentoring Program raises serious constitutional concerns because of these programs' religious content. We request assurances that in the future Waukegan CUSD will not allow these ministries to recruit students during the school day or at any school-sponsored events, and will not otherwise promote or endorse these religious programs.

As an initial matter, it is well settled that 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 Twp. v. Schempp*, 374 U.S. 203 (1963); *Engel v. Vitale*, 370 U.S. 421 (1962); *McCullum v Bd. of Educ.*, 333 U.S. 203 (1948). When churches or ministries approach a public school to offer a service to its students, the school must take care to ensure that the service is entirely secular and that the school does not appear to endorse the group's religious message in any way.

Allowing ministry representatives regular, or even one-time, access during school hours or school-sponsored events to recruit students for religious activities is a violation of the Establishment Clause. Courts have protected public school students from overreaching outsiders in similar situations. *See, e.g., Berger v. Rensselaer Sch. Dist.*, 982 F.2d 1160 (7th Cir. 1993) (holding that distribution of bibles by Gideons in school violated Establishment Clause). Courts have granted injunctions against schools for their complacency in such situations. *See, e.g., Roark v. S. Iron R-1 Sch. Dist.* 540 F. Supp.2d 1047, 1059 (E.D. Mo., 2008); *upheld in relevant part by* 573 F.3d 556, (8th Cir. 2009) (holding that school policy allowing evangelical Christian organization to distribute bibles in school violated Establishment Clause).

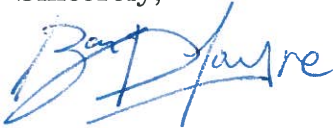
The District cannot allow non-school persons to treat schools as a recruiting ground for their religious mission. When a school connects its students with one particular group of faith-based mentors, it has unconstitutionally entangled itself with a religious message—in this case, a Christian message. This practice alienates those non-Christian students, teachers, and members of the public whose religious beliefs are inconsistent with the message being promoted by the school. This recruitment constitutes “a utilization of the tax-established and tax-supported public school system to aid religious groups to spread their faith.” *McCullum*, 333 U.S. at 210.

Public schools have an obligation to stay separate from religion because “the preservation and transmission of religious beliefs and worship is a

responsibility and a choice committed to the private sphere.” *Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290, 310 (2000) (quoting *Lee*, 505 U.S. 577, 589 (1992)). Concealing the religious nature of these mentorship programs while representatives recruit in schools only adds to this problem because parents may allow their children to sign up without realizing the program will include religious instruction. This partnership usurps the authority of parents, some of whom surely do not want their children approached by religious leaders at their child’s public school.

We request written assurances that the District will discontinue its partnership with the Yoked Mentoring Program and the Plan, Purpose and Promises Mentoring Program. Since these ministries do not offer any secular (non-faith-based) programs, it is inappropriate for the District to promote them in any way. Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan D. Jayne", with a stylized flourish at the end.

Ryan D. Jayne
Staff Attorney

Enclosure



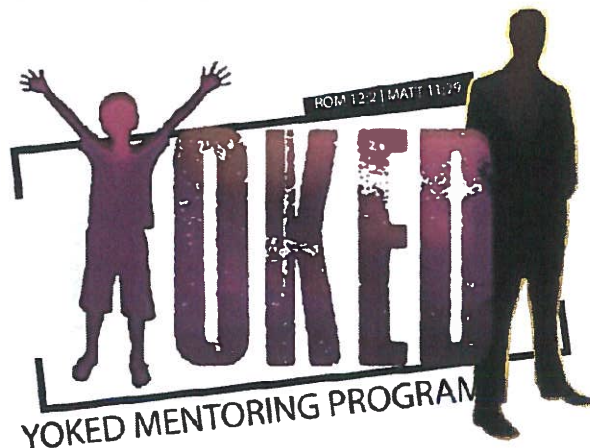
Yoked Mentorship Page shared a post.

September 21 at 12:41 PM · 🌐

We here tomorrow from 10am-2pm! Drop a comment below or message the page if you're son is attending 😊

Monthly program
Every 3rd & 4th
Saturday
10am - 1pm

Pleasant Grove
Baptist Church
541 Oak St.
Waukegan, IL
60085

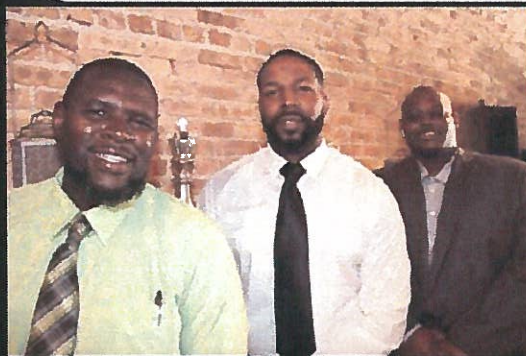


What is YOKED?

Yoked is a faith based mentoring program for boys ages 8-12. The goal is to help boys find their purpose through journaling, lecture, activities and trips.

HOW?

- > We help our young men discover and embrace their **PURPOSE** (Jeremiah 1:5)
- > We **STRENGTHEN** them to **STAND** against the attacks set up against them (Ephesians 6:13)
- > We lead them to a **PURPOSEFUL** life (Jeremiah 29:11)



- > We teach them to be young men of **INTEGRITY**, thus adding value to their community. (Proverbs 20:7)
- > We mold them into the **ROYAL KINGS** they were **CREATED** to be.

224-208-5690 | PO Box 625 Waukegan, IL 60079 | yokedonpurpose@gmail.com



Yoked Mentorship Page

August 14 · 🌐

If you're a parent of Miguel Juarez Middle School don't forget to stop by tomorrow from 2pm-7pm and get supplies for the upcoming year!! We will be there along with Plan, Purpose and Promises Mentoring Program and The Gentlemen's Club Barbershop! Happy to help and excited to serve! #Yoked #BeOnPurpose #PPP #GentlemensClub

AUG 15TH 2018
2 PM - 7 PM

JUAREZ STUDENTS & FAMILY ONLY!

BACK 2 SCHOOL

WHATEVER IT TAKES!

FREE Haircuts

MENTORING SIGN-UP

FOOD // BOUNCIES // FREE SCHOOL SUPPLIES // HEALTH & WELLNESS // TUTORING SIGN-UP

STUDENT SCHEDULE PICK-UP | PURCHASE SPIRIT WEAR & PE UNIFORMS

MIGUEL JUAREZ MIDDLE SCHOOL 201 N Butrick St. Waukegan, IL 60085

👍 2

3 Shares

👍 Like

💬 Comment

➦ Share



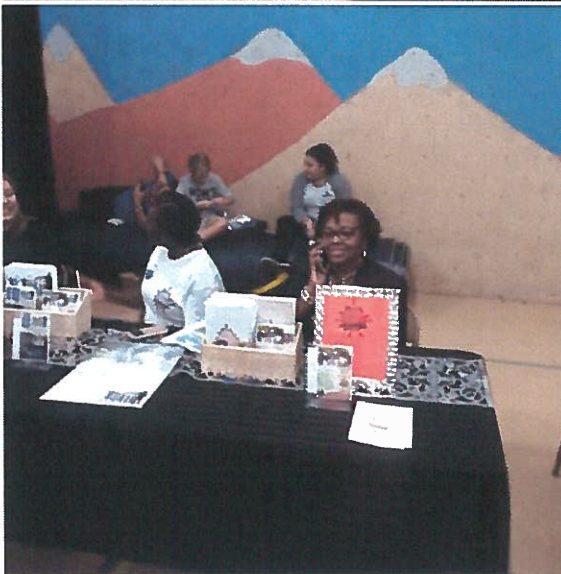


Yoked Mentorship Page is with Barbara Young.



August 4 · 🌐

Great day at the [Waukegan Public Schools Back to School Resource Fair!!](#)
We had a terrific time talking to parents about the [Yoked Mentorship Page Program](#) and [Plan, Purpose and Promises Mentoring Program!](#)
[#BOnPurpose](#)



👍❤️ 11

1 Share

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💬 Comment

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Yoked Mentorship Page

August 17 · 🌐



We had a great time Wednesday at Miguel Juarez Middle School along with Plan, Purpose and Promises Mentoring Program meeting parents and speaking with our youth!! We look forward to working together for a brighter future! #Yoked #PPP #Purpose #BrighterFuture



👍 Like

💬 Comment

➦ Share



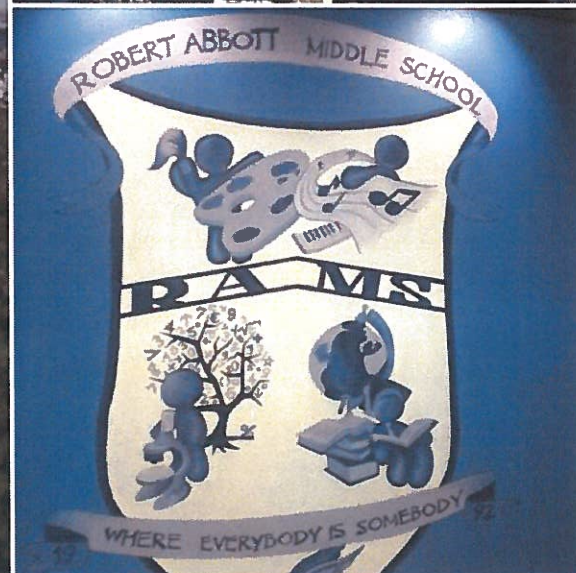
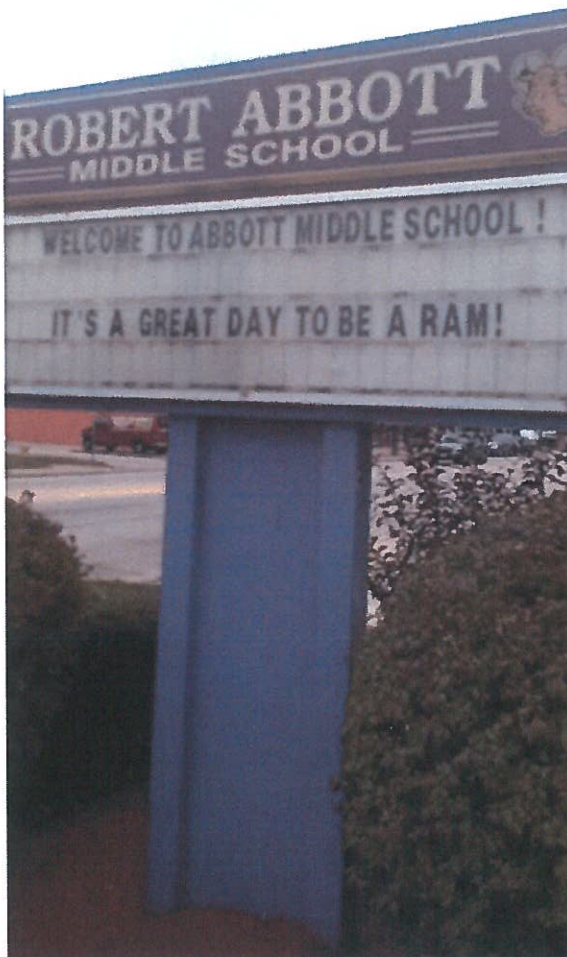


Yoked Mentorship Page

October 2 at 2:58 PM · 🌐



What a terrific time meeting with the youth at Robert Abbott Middle School!! Yoked will be meeting and working with the kids every Tuesday at the Middle School!! We're excited and humbled for the opportunity to serve our community! #Youth #Mentorship #PPP



❤️👍 8

1 Comment 2 Shares

👍 Like

💬 Comment

➦ Share

