

# FREEDOM FROM RELIGION *foundation*

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**SENT VIA EMAIL & U.S. MAIL: [bbrauneisen@castaicusd.com](mailto:bbrauneisen@castaicusd.com)**

Bob Brauneisen  
Superintendent  
Castaic Union School District  
28131 Livingston Ave.  
Valencia, CA 91355

Re: “Three Angels Haiti”

Dear Superintendent Brauneisen:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional concern in the Castaic Union School District. FFRF is a national nonprofit organization with more than 40,000 members across the country, including more than 5,100 members and two local chapters in California. Our purposes are to protect the constitutional principle of separation between state and church, and to educate the public on matters relating to nontheism.

A concerned Castaic USD parent has reported that Castaic Middle School is holding a fundraiser for “Three Angels Haiti,” a Christian ministry. Our complainant reports that the fundraiser for this religious ministry project is being organized and promoted by administrators and teachers at Castaic Middle School. It is our understanding that administrators and staff at the school have not informed students or parents that Three Angels Haiti is a Christian ministry and that the funds will not be used for secular purposes, but to indoctrinate students into the Christian religion.

Three Angels Haiti’s mission is “to help children in Haiti escape poverty so that they may experience God’s love.”<sup>1</sup> They also describe their goals as “to help them escape poverty, encounter Jesus, and become part of a healthy home.”<sup>2</sup> Students in the Christian school supported by the ministry “line up by class every school day and recite Psalm 23 and the Lord’s Prayer and then sing the national anthem and some worship songs before heading to their classrooms.”<sup>3</sup>

Organizing a fundraiser that for all intents and purposes employs school staff and resources to proselytize children in Haiti violates basic constitutional principles. It is inappropriate for public

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<sup>1</sup> <https://www.threeangelshaiti.org/what-we-do>

<sup>2</sup> <https://www.threeangelshaiti.org/>

<sup>3</sup> <https://www.threeangelshaiti.org/blog/2019/3/7/meet-lisa-our-student-sponsorship-superhero>

school teachers to use their authority to encourage students to donate to religious groups for religious purposes.

We write to request that the District prevent any further use of its time, resources, and employees to support this evangelical organization's mission. While it is laudable for a public school to promote student involvement in the community by volunteering and donating to charitable organizations, the school cannot use that goal as an avenue to fund a religious organization with a religious mission. Certainly, there are other secular non-profit organizations that offer charitable opportunities.

It is well settled that public schools may not show favoritism towards or coerce belief or participation in religion. *Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290 (2000); *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 Ed.*, 333 U.S. 203 (1948). Organizing a fundraiser that employs school staff and resources to collect donations to advance the mission of a religious ministry to help children “experience God’s love” and “encounter Jesus” violates basic constitutional principles.

It is inappropriate for public school teachers to use their authority to encourage students to donate to religious groups. This “[s]chool sponsorship of a religious message is impermissible because it sends the ancillary message to . . . 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, 309–10 (2000) (quoting *Lynch v. Donnelly*, 465 U.S. 668, 688 (1984) (O’Connor, J., concurring)). It also conflicts with personal religious and nonreligious views of many District students and families. Thirty-seven percent of the American population is non-Christian, including the almost 30 percent<sup>4</sup> who are nonreligious. At least a third of Generation Z (those born after 1996) have no religion,<sup>5</sup> with a recent survey revealing almost half of Gen Z qualify as “nones” (religiously unaffiliated).<sup>6</sup>

Finally, it is no defense to say that participation in this donation drive is voluntary. Courts have summarily rejected arguments that voluntariness excuses a constitutional violation. *See 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.”); *Schempp*, 374 U.S. at 288 (Brennan, J., concurring) (“[T]he availability of excusal or exemption simply has no relevance to the establishment question . . . .”). As the Supreme Court wrote in *Schempp*, offending religious practices are not “mitigated by the fact that individual students may absent themselves upon parental request, for that fact

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<sup>4</sup> Gregory A. Smith, *About Three-in-Ten U.S. Adults Are Now Religiously Unaffiliated*, Pew Research Center (Dec. 14, 2021), [www.pewforum.org/2021/12/14/about-three-in-ten-u-s-adults-are-now-religiously-unaffiliated/](http://www.pewforum.org/2021/12/14/about-three-in-ten-u-s-adults-are-now-religiously-unaffiliated/).

<sup>5</sup> Samuel J. Abrams, *Perspective: Why even secular people should worry about Gen Z's lack of faith*, Deseret News (Mar. 4, 2023), [www.deseret.com/2023/3/4/23617175/gen-z-faith-religious-nones-civic-life-volunteers-charity](http://www.deseret.com/2023/3/4/23617175/gen-z-faith-religious-nones-civic-life-volunteers-charity)

<sup>6</sup> 2022 Cooperative Election Study of 60,000 respondents, analyzed by Ryan P. Burge [www.religioninpublic.blog/2023/04/03/gen-z-and-religion-in-2022/](http://www.religioninpublic.blog/2023/04/03/gen-z-and-religion-in-2022/).

furnishes no defense to a claim of unconstitutionality under the Establishment Clause.” 374 U.S. at 224–25.

We request that the District end this religious fundraiser, redirect its charitable efforts to a secular organization, and refrain from all future promotion and coordination of fundraisers for religious ministries like Three Angels Haiti. Please inform us in writing of the steps you are taking to protect the right of conscience of your non-Christian and nonreligious students, parents, and teachers and to ensure that this type of violation does not continue or occur in the future.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Line", with a long horizontal flourish extending to the right.

Christopher Line  
Staff Attorney  
Freedom From Religion Foundation