

# FREEDOM FROM RELIGION *foundation*

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March 15, 2024

**SENT VIA EMAIL & U.S. MAIL: [frhodes@putnamcityschools.org](mailto:frhodes@putnamcityschools.org)**

Fred Rhodes  
Superintendent  
Putnam City Schools  
5401 N.W. 40th  
Oklahoma City, OK 73122

Re: Unconstitutional religious display

Dear Superintendent Rhodes:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional violation reported in Putnam City Schools. FFRF is a national nonprofit organization with more than 40,000 members across the country, including members in Oklahoma. 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 District employee has reported that Western Oaks Middle School prominently displays a bible verse in one of its hallways. The verse is Ephesians 3:20-21:

Now all glory to God, who is able through HIS mighty power at work within us to accomplish infinitely more than we might as or imagine.

Please see the enclosed photo. Our complainant reports that many employees are concerned about this inappropriate religious display but have not brought it up because of a fear of retribution.

We ask that the District remove this bible verse display immediately in order to protect students' First Amendment rights. The District should also ensure that there are no other religious displays in the school.

The District violates the Constitution when it allows its schools to display religious symbols or messages. 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); *McCollum v Bd. of Ed.*, 333 U.S. 203 (1948). This display directly violates the First Amendment by creating the appearance that the District prefers religion over nonreligion and Christianity over all other faiths.

Courts have continually held that public 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. Bloomingdale Pub. Schs.*, 33 F.3d 679 (6th Cir. 1994) (ruling that a painting of Jesus may not be displayed in a public school).

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 . . . 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*, 530 U.S. at 309 (quoting *Lynch v. Donnelly*, 465 U.S. 668, 688 (1984) (O’Connor, J., concurring)). Additionally, this religious display needlessly alienates those students and families who are non-Christians. Thirty-seven percent of the American population is non-Christian, including the almost 30 percent<sup>1</sup> who are nonreligious. At least a third of Generation Z (those born after 1996) have no religion<sup>2</sup>, with a recent survey revealing almost half of Gen Z qualify as “nones” (religiously unaffiliated).<sup>3</sup>

To protect students’ First Amendment rights, the District must remove this religious display from its hallway immediately, as well as any other religious displays it becomes aware of in its schools. Please respond in writing with the steps the District is taking to remedy this constitutional violation so that we may inform our complainant. Thank you for your time and attention to this matter.

Sincerely,



Christopher Line  
Staff Attorney  
Freedom From Religion Foundation

Enclosure

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<sup>1</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>2</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>3</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/).

