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January 18, 2022

**VIA EMAIL (*kheineman@FFRF.org*) AND  
CERTIFIED MAIL**

Karen M. Heineman  
Freedom From Religion Foundation  
P.O. Box 750  
Madison, WI 53701

Dear Ms. Heineman:

Re: Unconstitutional Prayer at School Board Meetings

I represent the Orrville City School District Board of Education.

The Orrville City School District Board of Education has received your December 22, 2021, letter concerning prayer at Board meetings. While the long-standing practice of including an invocation at the beginning of Board meetings has not previously been challenged, the Board recognizes that the Sixth Circuit's decision in *Coles v. Cleveland Bd. of Educ.* is controlling, and will, under advice of legal counsel, cease opening prayers. In lieu of an invocation, the Board will have a moment of silence to solemnize the proceedings and permit members and attendees to reflect on the important business of the Board and the community it serves.

Sincerely,

*Maria Limbert Markakis*

Maria Limbert Markakis

MLM/lmb

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