

# FREEDOM FROM RELIGION *foundation*

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May 3, 2024

**SENT VIA EMAIL & U.S. MAIL: [Robert.langford@sumnerschools.org](mailto:Robert.langford@sumnerschools.org)**

Superintendent Scott Langford  
Sumner County Schools  
695 East Main Street  
Gallatin, TN 37066

Re: Unconstitutional religious assignment

Dear Mr. Langford:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a religious assignment given to soccer players at Hendersonville High School. FFRF is a national nonprofit organization with over 40,000 members across the country, including members and a chapter in Tennessee. 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 parent informed us that coach and social studies teacher [REDACTED] gave the HHS boy's soccer team a religious assignment. On December 15, 2023, [REDACTED] assigned *Coach Wooden's Pyramid of Success* by John Wooden and Jay Carthy. His message to the team: "Every player is expected to have a copy by January 9th. If you have any questions please let me know." According to our complainant, this coach wanted the team to read the book together—akin to a book club.

The assigned book contains much about religion and faith. Particularly, Coach Wooden's Christian viewpoints are stressed as a factor leading to his success. According to Google Books's preview, the word "Bible" shows up roughly thirty times in the preview alone; the word "God" shows up roughly seventy times; and the word "lord" shows up roughly twenty times. Cumulatively, *Coach Wooden's Pyramid of Success* has hundreds of references to Christianity. That is impressive considering the book is only one hundred and sixty pages long.

Diving deeper, coach Wooden's book also cites the bible. For instance, coach Wooden's book quotes and refers to Psalms 42:1b–2, Ecclesiastes 12:1, Romans 12:11, Act 19:24–28, 1 Corinthians 1:12, 3:4–6, 4:6–22, Galatians 6:9, Revelation 2:4, Acts 18:28, Proverbs 21:5, Ephesians 6:7, 1 Thessalonians 2:9, Ecclesiastes 4:9, 2 Samuel 11:11, 1 Thessalonians 5:6, 1 Peter 5:8, Proverbs 22:29, Leviticus 26:13, Proverbs 31:29, Psalms 32:8, Job 1:1, 1 Corinthians 3:7–8, 1 Corinthians 4:6, Romans 2:4, Romans 5:1, Romans, 12:4–5, Numbers 32:18, Ruth 1:16, 1 Samuel 18:3, Job 2:11, Daniel 3:27, Daniel 3:3–4:3, Proverbs 17:17, 18:24, Ecclesiastes 4:12, 2 Corinthians 23:27, 1 Corinthians 13:4–7, John 15:13, Philippians 2:3, 2 Timothy 4:6–8, Timothy 4:9, and 1 Corinthians 12:13. This list is not exhaustive.

Concluding every chapter, is a section titled “Your Turn.” Here, the authors assign external material to the reader. All of this extra material are bible verses. The assigned readings include Proverbs 13:4, 13:11, 14:23, 22:29, 28:19, 31:13–27, 1 Corinthians 10:31, Genesis 39:1–20, Romans 3:21–30, Galatians 5:16–24, James 3:1–12; 2 Peter 1:5–11, Exodus 28:3, 31:3, 35:10, 25, 35, 36:1, 1 Kings 7:14, 1 Chronicles 22:15, 28:21, 2 Chronicles 2:7, Psalms 33:11, Jeremiah 29:11, Psalms 40:5, John 15:12, Acts 8:1–3, Proverbs 16:3, Proverbs 19:21, Genesis 11:4–6, Luke 14:28, Luke 15:4–32, Genesis 41:46–57, 1 Corinthians 15:58, Acts 2:1–41, 4:1–22, Matthew 28:19–20, John 20:21, Romans 12:3–5, 10, 1 Corinthians 3:6–9, 12:12–27, 1 Thessalonians 3:12, and 1 Peter 1:22. This list is also not exhaustive.

Similarly concluding every chapter is a prayer for the reader. For example, this prayer concludes the chapter on Team Spirit:

Almighty Creator, You made us to best function interdependently. Give me an eagerness to contribute my talents and gifts to Your body of believers that we might function as a team and accomplish more for the Kingdom collectively than we could ever accomplish individually. Thank You.

Most disturbing are Jay Carthy’s portions. He refers exclusively to biblical stories. A few select quotes demonstrate the book’s sectarian perspective “...with patience, keep a clear mind, not be afraid of suffering, continue to bring people to Christ, and to complete the ministry God had given to him.” In his foreword, Carty writes:

The principles laid down in the Bible produce good in people and societies. For example, if enough people practiced Christian ethics today, both believers and nonbelievers could leave their homes unlocked, a handshake would be better than a contract, and your children could safely play in neighborhood parks. Why? Biblical truth works if people apply it in their lives, whether or not the people are followers of Jesus Christ... With God’s touch, this book can change your life dramatically. It has the potential of facilitating the focus of your life’s work and ministry.

Coach Carty later condemns religious tolerance:

When it came to spiritual matters, there was a time when people could follow whichever god they chose to follow, but we had the right to assert that they were wrong. Our convictions didn’t give us the right to persecute others, but we did have the right to disagree without being juxtaposed as enemies. Today’s mind shapers would have us believe that any serious seeker will find a path to God because all faiths are the same. Moreover, another who does not fall in line with this thinking is judged to be a judgmental bigot. In basketball, we would call that new-school thinking. Coach [Wooden] and I are old school.

Carty openly deems all non-Christian religions to be incorrect:

There are Hindus, Buddhists, Muslims, Taoists, Sikhs, animists, Scientologists, and so many more. The world is full of religions that claim to be the best or only way; however, they can't all be correct. Jesus said, 'I am the way, the truth, and the life. No one can come to the Father except through me' (John 14:6).

At one point, the authors start to justify law-breaking in the name of Christ:

Just to survive, Christians will be tempted to be dishonest about their faith. Peter faced a similar quandary. The Pharisees didn't like his preaching and threatened to throw him in jail if he didn't shut up. He told them no and kept preaching. Why did Peter violate existing law? For the greater good of all, he had to conform to the higher laws of God. We can call this a just cause...Peter broke the law for a just cause and went to jail. At some point, each of us may need to make a similar just-cause decision. There are powerful forces attempting to remove God from the fabric of our society. The day may come when we must decide whether we will follow a law of the land or the Law of God. Our honesty may be tested.

Following that quote, is a prayer about law-breaking, at the end of the chapter on honesty:

Almighty God, give me the courage to stand up for you even if there comes a time when the laws of the land say I can't.... Through the power of your holy spirit help me to stay faithful, even in the face of persecution.

This assignment alienated our complainant and their child, who are now on notice that Coach [REDACTED] does not respect their religious viewpoints. It is improper and unacceptable for a public school coach to impose his personal religious beliefs onto students in this manner.

We write to ask HHS to instruct all faculty, including athletic coaches, to refrain from assigning sectarian, proselytizing homework. Coach [REDACTED] must apologize to the HHS boys' soccer student athletes and any other students who received this inappropriate reading assignment.

The First Amendment's Establishment Clause requires government neutrality between religions, and between religion and nonreligion. See *McCreary v. Am. Civil Liberties Union of Ky.*, 545 U.S. 844, 860 (2005); *Wallace v. Jaffree*, 472 U.S. 38, 53 (1985); *Epperson v. Arkansas*, 393 U.S. 97, 104 (1968); *Everson v. Bd. of Ed. of Ewing*, 330 U.S. 1, 15–16 (1947). Here, [REDACTED]'s assignment puts religion over non-religion, and Christianity over other religions—and that violates the Establishment Clause.

It is uncontroversial for a coach to assign a book to their team to build camaraderie. But [REDACTED]'s assignment does the opposite: It sows division between those who agree with the book—Christians who share Coach Wooden's "old school" views on religion—and those who do not.

Student athletes are especially susceptible to coercion. Religious assignments for student athletes places them in a difficult position: They must either go along with their coach's religious preferences—likely against their own conscience—or openly dissent at risk of their team standing. That ultimatum is exactly what the Establishment Clause guards against. A student who does not share the Christian beliefs mentioned in *Coach Wooden's Pyramid of Success* faces the same dilemma: Leave the team or betray their conscience.

Like any public school employee, ████████'s actions must be consistent with the First Amendment. While *Coach Wooden's Pyramid of Success* comes short of assigning the bible itself, the biblical references coupled with the external citations transmogrifies the simple book club into something more—a bible study. Promoting religious viewpoints through the school's extracurricular activities needlessly alienates students and families who are not Christian, including those who are nonreligious. At least a third of Generation Z (those born after 1996) have no religion,<sup>1</sup> with a recent survey revealing almost half of Gen Z qualify as “nones” (religiously unaffiliated).<sup>2</sup>

But perhaps the most compelling point comes from coach Wooden himself:

I served as a basketball coach at a public institution; therefore, I didn't talk about my faith. I never felt it was appropriate. I always had a bible on my desk and I intentionally led by example, based on Christ's teaching; but I wasn't vocal about my beliefs. I just attempted to demonstrate them by the way I live my life...[F]aith in God wasn't a part of my curriculum, so I didn't preach. I'm not a minister in that sense. I was a basketball coach who was charged with producing good men and graduates who also played basketball...I never tried to change someone's faith. I saw that as God's job, not mine.

Please instruct all staff and faculty to—like coach Wooden—refrain from proselytizing, including assigning books containing religious messages. Please inform us in writing of steps that are being taken to rectify the situation. Thank you for your time and attention.

Sincerely,



Hirsh M. Joshi  
*Patrick O'Reiley Legal Fellow*  
*Freedom From Religion Foundation*

Enclosures

<sup>1</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>2</sup> Ryan P. Burge, *2022 Cooperative Election Study of 60,000 respondents*, [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/).