FREEDOM FROM RELIGION foundation

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August 27, 2025

SENT VIA EMAIL & U.S. MAIL: phartrodas@monroviaschools.net

Superintendent Paula Hart Rodas Monrovia Unified School District 325 E. Huntington Dr. Monrovia, CA 91016

Re: Unconstitutional coach-led prayer

Dear Superintendent Rodas:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional violation reported in Monrovia USD. FFRF is a national nonprofit organization with over 42,000 members across the country, including more than 5,300 members and several 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 District parent reports that Monrovia High School football coaches, Head Coach and Assistant Coach regularly lead student-athletes in prayers on the field prior to football games. Our complainant-parent reports that Coach and Coach have been leading student-athletes in prayers for some time now, possibly at least several years. We're told that the coach-led prayers make our complainant's child "uncomfortable," but that the student does not dissent or sit the prayers out for fear of retaliation from Coach or

We ask that the District investigate this situation and ensure that Coach and Coach cease leading student-athletes in prayer.

Public school coaches cannot constitutionally lead their teams in prayer or promote their personal religious beliefs to student-athletes. The Supreme Court has continually struck down school-sponsored prayer in public schools. *See, e.g., Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290, 308 (2000) (holding student-led prayer over the loudspeaker before football games unconstitutional."); *Lee v. Weisman*, 505 U.S. 577 (1992) (finding prayers at public high school graduations an impermissible establishment of religion); *Wallace v. Jaffree*, 472 U.S. 38 (1985) (overturning law requiring daily "period of silence not to exceed one minute . . . for meditation or daily prayer"); *Sch. Dist. of Abington Twp. v. Schempp*, 374 U.S. 203 (1963) (holding school-sponsored devotional Bible reading and recitation of the Lord's Prayer unconstitutional); *Engel v. Vitale*, 370 U.S. 421 (1962) (declaring school-sponsored prayers in public schools unconstitutional). Here, both coaches allegedly have a pattern and practice of leading student-athletes in prayer before football games while acting in their official capacities as coaches.

It is unconstitutional for public school employees to direct students to partake in religious activities or to participate in the religious activities of their students. *See, e.g., Borden v. Sch. Dist. of the Twp. of East Brunswick*, 523 F.3d 153 (3d Cir. 2008), *cert. denied*, 129 S.Ct. 1524 (2009) (declaring the coach's organization, participation and leading of prayers before football games unconstitutional); *Doe v. Duncanville Indep. Sch. Dist.*, 70 F.3d 402 (5th Cir. 1995) (holding a basketball coach's participation in student prayer circles unconstitutional). For example, the Fifth Circuit Court of Appeals held that a coach's attempts to

engage in religious activities with players at team events were unconstitutional because the religious promotion took place "during school-controlled, curriculum-related activities that members of the [athletic] team are required to attend. During these activities [district] coaches and other school employees are present as representatives of the school and their actions are representative of [district] policies." *Duncanville*, 70 F.3d at 406.

You may be aware that the Supreme Court held in *Kennedy v. Bremerton School District* that a high school football coach's quiet, private post-game prayer was constitutional. 597 U.S. 507, 512–14 (2022). Throughout its opinion, the Court repeatedly stressed that the coach quietly prayed alone. *Id.* (the coach "offered his prayers quietly while his students were otherwise occupied."). The prayers "were not publicly broadcast or recited to a captive audience. Students were not required or expected to participate." *Id.* at 542. In stark contrast, Coach and Coach reportedly lead student-athletes in prayers during official activities.

Student-athletes are especially susceptible to unconstitutional coercion. When coaches lead the team in prayer, students, such as our complainant's child, will no doubt feel that participating in that prayer is essential to pleasing the coaches and being viewed as a team player. It is unrealistic and unconstitutional to put student-athletes to the choice of allowing their constitutional rights to be violated in order to maintain good standing in the eyes of their coaches and peers or openly dissenting at the risk of retaliation. Putting student-athletes in that position is not only unfair, but also violates their First Amendment rights.

"The preservation and transmission of religious beliefs and worship is a responsibility and a choice **committed to the private sphere**." *Santa Fe*, 530 U.S. 290 at 310 (quoting *Lee*, 505 U.S. 577 at 589) (emphasis added). Needlessly inserting religion into the school's football program marginalizes student-athletes who are nonreligious or members of minority religions, as well as those who simply do not believe in public prayer. Nearly half of Generation Z (those born after 1996) are nonreligious, so this likely represents a number of students on the Monrovia High School football team.¹

In order to protect students' First Amendment rights, we ask that Monrovia USD investigate this matter and ensure that Coach and Coach cease leading student-athletes in prayer and refrain from promoting their personal religious beliefs to students. Please respond in writing with the steps the District is taking to ensure that constitutional violation ends so that we may inform the parent who contacted us. Thank you for your time and attention to this matter.

Sincerely,

Samantha F. Lawrence

Staff Attorney

Freedom From Religion Foundation

¹ 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/.