

FREEDOM FROM RELIGION *foundation*

P.O. BOX 750 › MADISON, WI 53701 › (608) 256-8900 › WWW.FFRF.ORG

July 29, 2025

SENT VIA EMAIL & U.S. MAIL: bpender@lisbon.k12.il.us

William Pender
Superintendent
Lisbon Community Consolidated School District 90
127 S. Canal St.
Newark, IL 60541

Re: Unconstitutional graduation prayer

Dear Superintendent Pender:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding Lisbon Grade School including prayers at its official graduation ceremony. FFRF is a national nonprofit organization with over 42,000 members across the country, including more than 1,400 members in Illinois. Our purposes are to protect the constitutional principle of separation between state and church, and to educate the public on matters relating to nontheism.

We are informed that Lisbon Grade School has included a pre-planned invocation and benediction at its 8th grade graduation ceremony this year. It is our understanding that Kari Friestad delivered a Christian sermon before leading the audience in prayer at the ceremony. Friestad also led a benediction towards the end of the ceremony blessing the students as they graduated. The content of her speech reportedly included direct references to Christian theology and was delivered in the tone and format of a sermon. Both the invocation and the later benediction were included in the graduation ceremony program, demonstrating that they were pre-planned and school-sponsored prayers.

We ask that the Lisbon Community Consolidated School District investigate and ensure that Lisbon Grade School ceases including school-sponsored prayer at its graduation ceremonies.

Students have the First Amendment right to be free from religious indoctrination in their public schools, including when participating in graduation ceremonies. Public schools may not show favoritism toward 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). The Supreme Court has continually struck down prayers at school-sponsored events, including graduations. *See Lee*, 505 U.S. 577 (declaring clergy-delivered prayers unconstitutional at a public school graduation); *Santa Fe*, 530 U.S. 290.

School officials may not invite a student, faculty member, clergy member, or anyone else to give any type of prayer, invocation, benediction, or sermon at a public school-sponsored event. *See Santa Fe*, 530 U.S. 290 (holding that even student-delivered prayers pursuant to school policy at high school football games violate the Establishment Clause). “It is beyond dispute that, at a minimum, the Constitution guarantees that government may not coerce anyone to support or participate in religion or its exercise[.]” *Lee*, 505

U.S. 577, 587. Furthermore, government-sponsored prayer “has the improper effect of coercing those present to participate in an act of religious worship.” *Santa Fe*, 530 U.S. 290, 312.

It makes no difference how many students want prayer or wouldn’t be offended by prayer at their graduation ceremony; the courts have continually reaffirmed that the rights of minorities are nonetheless protected by the Constitution. As the Supreme Court has said, “fundamental rights may not be submitted to vote; they depend on the outcome of no elections.” *Id.* at 304–05 (quoting *W. Va. Bd. of Educ. v. Barnette*, 319 U.S. 624, 638 (1943)). “The very purpose of a Bill of Rights was to withdraw certain subjects from the vicissitudes of political controversy, to place them beyond the reach of majorities and officials and to establish them as legal principles to be applied by the courts.” *Barnette*, 319 U.S. at 638. Public schools have a constitutional obligation to remain neutral toward religion and to protect the rights of conscience of all students.

The Supreme Court’s decision in *Kennedy v. Bremerton School District* did not overturn the above cited cases and does not apply to the situation at hand. In *Kennedy*, the Court held that an assistant 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 contrast, Lisbon Grade School publicly broadcasted prayers to the entire audience of students and their families as part of its graduation ceremonies.

Grade school graduation is a once in a lifetime event that students and families look forward to. There is no need to marginalize non-Christian and nonreligious students and family members by inserting prayer into an event that is meant to honor all students regardless of which faith, if any, they believe in. At least a third of Generation Z (those born after 1996) have no religion,¹ with a recent survey revealing almost half of Gen Z qualify as “nones” (religiously unaffiliated).²

In order to respect the First Amendment rights of all students and their families, we ask that the district investigate this matter to ensure that all future graduations do not include school-sponsored prayers. Please respond in writing with the steps the district is taking to address this situation. Thank you for your time and attention to this matter.

Sincerely,



Madeline Ziegler
Staff Attorney
Freedom From Religion Foundation

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Enclosure

¹ 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.

² Ryan P. Burge, *2022 Cooperative Election Study of 60,000 respondents*, April 3, 2023, www.religioninpublic.blog/2023/04/03/gen-z-and-religion-in-2022/.

LISBON GRADE SCHOOL DISTRICT
CLASS OF 2025
GRADUATION CEREMONY
MAY 21, 2025

PROCESSIONAL

"Pomp and Circumstance" by Edward Elgar
Angelo Scheunayder

PLEDGE OF ALLEGIANCE

Kari Friestad

INVOCATION

Elijah Swenson

WELCOME

Given by our Salutatorian

CLASS HISTORY

Brock Friestad and Maddyn Thoms

SHOW

"Forever Young" by Alphaville
"Ain't No Mountain High Enough" by Marv
"How to Save a Life" by The Fray
"Don't Dream It's Over" by Crowded House

PRESENTATION OF
ACADEMIC AWARDS

Mr. William Pender, Superintendent

LION PRIDE AWARD

Mr. William Pender, Superintendent

ROLL CALL AND
RECOGNITION OF PARENTS

Mrs. Cindy Heap and Mrs. Annika Johnson

PRESENTATION OF CLASS

Mr. William Pender, Superintendent

PRESENTATION OF
DIPLOMAS

Mr. Eric Friestad, President
Board of Education

FAREWELL

Given by our Valedictorian

Leah Fitzgerald

BENEDICTION

Kari Friestad

RECESSIONAL

"March from Two Generations" by John Williams