

FREEDOM FROM RELIGION *foundation*

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November 7, 2025

SENT VIA U.S. MAIL & EMAIL: jake.allen@moorevilleschools.org

Jake Allen
Superintendent
Mooreville Schools
11 W. Carlisle St.
Mooreville, IN 46158

Re: Unconstitutional adult-led religious club

Dear Superintendent Allen:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional violation occurring in Mooreville Schools (District). FFRF is a national nonprofit organization with more than 41,000 members across the country, including nearly 600 members in Indiana. 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 member of the Mooreville High School community informs us that Choir Director Jason Damron has started a “BetterMan study” for MHS students. Please see the enclosed screenshot of a social media post where Mr. Damron discussed leading this group.

According to its website, BetterMan is “a Christian organization” that provides “an 11-week group study on the essentials of biblical manhood and how men can live it out at home, at work, with friends, and with God.”¹ The group’s guide for leaders makes clear the program is intended to convert participants to Christianity: “True transformation will come from God working in men’s lives. The Gospel will be clearly shared after Session 6 and that is a great opportunity to make sure you know where each guy in your group is with Jesus. Call any man who lacks faith to believe in Him!”²

We write to request that Mooreville Schools immediately investigate and ensure none of its staff members are unconstitutionally sponsoring religious activities in its schools. District staff may not lead or otherwise participate in religious clubs at public schools. Doing so violates the First Amendment and jeopardizes the authenticity of student-led religious organizations. We ask the District to investigate and ensure that any Mooreville student religious clubs are authentically student-initiated and student-led.

It is inappropriate and unconstitutional for the District to allow staff-led religious clubs. Public schools may not show favoritism toward or coerce belief or participation in religion. *Santa Fe*

¹ <https://betterman.com/faq>.

² <https://betterman.com/hubfs/Study%20Leader%20Guide%20Core%20July%202024-1.pdf?hsLang=en>.

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). It is both inappropriate and unconstitutional for public school teachers to promote, lead, and organize a religious club for students and use their position at a public school to attempt to convert their students to their personal religion.

To avoid encouraging or coercing students into participating in a religious club, the District may not allow staff to be involved in student religious clubs beyond a supervisory capacity. The Equal Access Act, which allows religious student clubs to form in public secondary schools, requires that “employees or agents of the school or government are present at religious meetings only in a nonparticipatory capacity.” 20 U.S.C. § 4071(c)(2). Students in secondary schools may organize religious clubs but these must be entirely student-initiated and student-led. *See Bd. of Educ. of the Westside Cty. Sch. v. Mergens*, 496 U.S. 226, 253 (1990) (holding the Equal Access Act constitutional). The Equal Access Act does not permit participation of public school staff and outsider involvement in the religious activities of students. “Under the [Equal Access] Act . . . faculty monitors may not participate in any religious meetings, and nonschool persons may not direct, control or regularly attend activities of student groups.” *Id.* at 253 (citing 20 U.S.C. §§ 4071(c)(3) and (5)). Any school religious clubs must be bona fide student clubs that are both student-initiated and student-run. Here, it appears that Mr. Damron is leading a religious club in direct violation of the First Amendment and the Equal Access Act.

This not only violates students’ First Amendment rights, it needlessly alienates all students and families who do not subscribe to Christianity, including the more than half of Generation Z (those born after 1996) who are non-Christian, including 43 percent who are nonreligious.³ The “[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 309–10 (quoting *Lynch v. Donnelly*, 465 U.S. 668, 688 (1984) (O’Connor, J., concurring)).

Voluntariness is no excuse for violating students’ rights. Courts have summarily rejected such arguments. *See generally Lee*, 505 U.S. at 596 (“the State cannot require one of its citizens to forfeit [their] rights and benefits as the price of resisting conformance to state-sponsored religious practice.”); *Schempp*, 374 U.S. at 288 (Brennan, J., concurring) (“the availability of excusal or exemption simply has no relevance to the establishment question”); *Mellen v. Bunting*, 327 F.3d 355, 372 (4th Cir. 2003) (“VMI cannot avoid Establishment Clause problems by simply asserting that a cadet’s attendance at supper or his or her participation in the supper prayer are ‘voluntary.’”); *Jager v. Douglas Cnty. Sch. Dist.*, 862 F.2d 825, 832 (11th Cir. 1989) (“ . . . whether the complaining individual’s presence was voluntary is not relevant to the Establishment Clause analysis . . . [which] focuses on . . . state action, not on the choices made by the complaining individual.”).

The Supreme Court has recognized that “[f]amilies entrust public schools with the education of their children, but condition their trust on the understanding that the classroom will not purposely

³ Pew Research Center (2024), <http://bit.ly/48Drzce>.

be used to advance religious views that may conflict with the private beliefs of the student and his or her family.” *Edwards v. Aguillard*, 482 U.S. 578, 584 (1987). Parents have the constitutional right to determine their children’s religious or nonreligious upbringing, not schools. Here, Mooresville Schools has violated the trust that parents place in District staff to follow the Constitution and refrain from imposing their own religious beliefs on the children they teach.

In order to comply with the First Amendment and the Equal Access Act, we ask that Mooreville Schools investigate this situation and ensure that there is no staff organization of or participation in BetterMan or any other religious meetings with students. Any religious clubs in the District must be genuinely student-initiated and student-run. Please respond in writing with the steps the District is taking to remedy this constitutional violation. Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Madeline Ziegler". The signature is written in a cursive, flowing style.

Madeline Ziegler
Staff Attorney

Enclosure



Jason Damron



2d ·

Hello, everyone! I'm starting a BetterMan study with about 40 young men at MHS on Friday mornings. I went through this study and have listened to all of the podcast episodes, and it has changed my life. I'm a better father, husband, and teacher because of it. God has opened several doors for me at the high school, and I am excited to be able to lead these young men in hopes that it can change the culture of our school.

I want to provide them with a good breakfast, and I'm looking for people to help support them by either providing a breakfast dish or monetarily. Here is a Signup Genius if you are able to help!



signupgenius.com

BetterMan Breakfast