

FREEDOM FROM RELIGION *foundation*

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

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SENT VIA EMAIL & U.S. MAIL: breyburn@fremont.net

Brad Reyburn
Superintendent
Fremont Public Schools
450 E. Pine St.
Fremont, MI 49412

Re: Unconstitutional bible distribution and concerns regarding missionaries in school

Dear Superintendent Reyburn:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding constitutional violations occurring in Fremont Public Schools. FFRF is a national nonprofit organization with over 41,000 members across the country, including more than 1,100 members in Michigan. 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 reported that over the last few months, NET Ministries missionaries have been coming to Fremont Middle School to talk to students about Christianity twice a week during the lunch hour. One of the missionaries reportedly told their child that the missionaries were there “to talk about anything you want to talk about, and of course spread the word of God.” The NET (National Evangelization Teams) Ministries website says that Discipleship Teams are the missionaries who “attend school lunches” and that they “focus on evangelistic outreach.”¹

Our complainant explained that this made their child and other students feel “uncomfortable” and “othered” by the obvious presence of a religious group during the school day.

Additionally, the parent reported that Gideons International sent permission slips home with students to distribute bibles the following week at school. We understand that flyers advertising the on campus bible distribution were posted around the school.

We ask that the District investigate and ensure that its schools cease giving religious representatives access to students in order to proselytize them.

The District cannot offer religious organizations unique access to its schools in order to proselytize, recruit, or distribute religious materials to students. The District cannot allow its schools to be used as recruiting grounds for religious missions. 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). Here, the District allowed NET Ministries to disrupt the school day by talking to students about Christianity on campus during the lunch hour. It also allowed Gideons International access to students to distribute religious materials. Giving NET Ministries missionaries and Gideons International preferential treatment and allowing them to proselytize students during lunch or distribute bibles to them during the school day is unconstitutionally coercive and signals clear favoritism toward religion over nonreligion, and Christianity over all other faiths.

¹ <https://www.netusa.org/discipleship-teams>.

The District should be aware that giving religious organizations preferential access to students on campus violates the Establishment Clause. The courts have protected public school students from overreaching outsiders in similar situations. *See, e.g., Berger v. Rensselaer Sch. Dist.*, 982 F.2d 1160 (7th Cir. 1993) (holding that distribution of bibles by Gideons in school violated Establishment Clause). Even when distribution of religious material to students in school is done passively, courts have ruled that that distribution may be unconstitutional. *See Roark v. South Iron R-1 Sch. Dist.*, 573 F.3d 556 (8th Cir. 2009) (upholding an injunction prohibiting bible distribution on school property). Bible distributions in school during the school day unconstitutionally coerce students to take, read, and reflect upon religious literature. Students who see their peers taking bibles will no doubt feel pressured to take a bible in order to fit in.

It is no defense that a permission slip went home requiring a voluntary opt-in to this bible distribution. Courts have summarily rejected arguments that voluntariness excuses a constitutional violation. *See Lee v. Weisman*, 505 U.S. 577, 596 (1992) (“It is a tenet of the First Amendment that the State cannot require one of its citizens to forfeit his or her rights and benefits as the price of resisting conformance to state-sponsored religious practice.”); *Abington Sch. Dist. v. Schempp*, 374 U.S. 203, 288 (1963) (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.’”).

“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. at 310 (quoting *Lee*, 505 U.S. at 589). Allowing missionaries to proselytize students during the school day and allowing the distribution of religious materials at school are particularly troubling for those parents and students who are not Christians or those who do not subscribe to any religion. This “[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.’” *Id.* at 309–10 (quoting *Lynch v. Donnelly*, 465 U.S. 668, 688 (1984) (O’Connor, J., concurring)). By allowing missionaries into the school to proselytize students and allowing Gideons International to pass out bibles, therefore foisting their personal religious beliefs onto students, the District needlessly marginalized students who are among the thirty-eight percent of Americans who are non-Christian,² including the 43 percent of Generation Z who are nonreligious.³

Fremont Public Schools must investigate and ensure that Piedmont Middle School ceases granting adult religious representatives access to students in order to distribute religious materials to them and to proselytize them. Please respond in writing with the steps that Fremont Public Schools is taking to address this situation so we may inform the parent who contacted us. Thank you for your time and attention to this matter.

Sincerely,



Charlotte R. Gude
Patrick O’Reiley Legal Fellow
Freedom From Religion Foundation

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² Pew Research Center (2024), <http://bit.ly/3W6Cl3m>.

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