

FREEDOM FROM RELIGION *foundation*

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June 2, 2026

SENT VIA EMAIL & U.S. MAIL: tracy.dorland@jeffco.k12.co.us

Superintendent Tracy Dorland
Jeffco Public Schools
1829 Denver West Dr., Bldg. #27
Golden, CO 80401

Re: Unconstitutional prayer at official school event

Dear Superintendent Dorland:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional violation at a recent event in Jeffco Public Schools (“the District”). FFRF is a national nonprofit organization with over 41,000 members across the country, including more than 1,400 members and two chapters in Colorado. 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 District parent reports that the May 12, 2026 Bear Creek High School annual track team awards banquet included a student-led prayer directed by coach Caroline Danks. The parent who contacted us states that the Coach Danks selected a student and had them lead approximately 50 students and guests in a Christian prayer at the official banquet.

Our parent-complainant explained that the prayer made them feel “angry.” The parent also stated that they would have spoken up but did not because they “didn’t want to somehow jeopardize [their child’s] standing in the community.” The parent described feeling “shocked that [the prayer] was so casually done.” According to the parent, everyone at the banquet was told to “stop what they were doing to pray before eating.” The parent expressed concerns as an atheist themselves and on behalf of Muslim guests at the banquet.

Out of respect for the First Amendment, we ask that the District investigate and ensure that future school events do not include school-sponsored prayers.

Public schools may not show favoritism toward or coerce belief or participation in religion. *See Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290 (2000) (ruling that student-led prayer at a public high school’s football games violated the First Amendment), *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). Moreover, school officials may not direct students to give any type of prayer, invocation, benediction, or sermon at public school-sponsored events.

See Lee, 505 U.S. 577; *Santa Fe*, 530 U.S. 290. “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. at 587. Government-sponsored prayer “has the improper effect of coercing those present to participate in an act of religious worship.” *Santa Fe*, 530 U.S. at 312. Here, Coach Danks crossed the line by directing a student to lead all fellow students and guests in prayer at the official annual awards banquet. The school-sponsored prayer coerced all in attendance, including our complainant and their student, to observe and participate in a religious exercise. As expressed by the parent-complainant’s reaction, “[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)).

Even if Coach Danks claims that participation in the prayer was voluntary, voluntariness is not a safeguard against violating students’ First Amendment rights. Courts have summarily rejected arguments that voluntariness excuses a constitutional violation. *See generally Lee*, 505 U.S. at 596 (“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.”); *Schempp*, 374 U.S. at 288 (Brennan, J., concurring) (“Thus, the short, and to me sufficient, answer is that 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 County Sch. Dist.*, 862 F.2d 825, 832 (11th Cir. 1989) (“[W]hether the complaining individual’s presence was voluntary is not relevant to the Establishment Clause analysis . . . The Establishment Clause focuses on the constitutionality of the state action, not on the choices made by the complaining individual.”).

It does not matter whether attendees at a school-sponsored event want prayer or would not be offended by prayer. As the Supreme Court has said, “fundamental rights may not be submitted to vote; they depend on the outcome of no elections.” *Santa Fe*, 530 U.S. 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. The District has a constitutional duty to remain neutral toward religion. By allowing a coach to direct a student to lead prayers at an official school-sponsored event, Bear Creek High School, and thus the District, abridges that duty. School-sponsored prayers needlessly marginalize those students and community members, such as our complainant and their student, who are among the 47 percent of Coloradans who are non-Christian,¹ including the 43 percent of Generation Z who are nonreligious.²

¹ Pew Research Center (2024), <https://www.pewresearch.org/religious-landscape-study/state/colorado/>.

² Pew Research Center (2024), <http://bit.ly/48Drzce>.

Out of respect for students' First Amendment rights and the religious diversity of the community, we ask that Jeffco Public Schools investigate and ensure that Coach Danks ceases directing students to lead prayer at school-sponsored events. Please respond in writing with the steps being taken to address this matter so we may inform the parent who contacted us.

Sincerely,

A handwritten signature in black ink, reading "Samantha F. Lawrence". The signature is fluid and cursive, with the first name "Samantha" being the most prominent part.

Samantha F. Lawrence
Staff Attorney
Freedom From Religion Foundation

SFL:trm