

FREEDOM FROM RELIGION *foundation*

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

September 22, 2026

SENT VIA EMAIL & U.S. MAIL: bruce_orr@lakesidesd.org

Superintendent Bruce Orr
Lakeside School District
2837 Malvern Ave.
Hot Springs, AR 71901

Re: Unconstitutional religious field trip

Dear Superintendent Orr:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional concern surrounding an upcoming field trip in the Lakeside School District. FFRF is a national nonprofit organization with nearly 41,000 members across the country, including members and a local chapter in Arkansas. 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 reported that Lakeside Primary School is taking students on a field trip to Family Farm, a Christian Day Camp. The field trip is scheduled for October 1st. We are informed parents received notification of this trip when permission slips were sent home on September 14th. Please see the enclosed photograph of the permission slip our complainant's child brought home. The parent who contacted us states that they personally visited Family Farm in October 2025 and witnessed religious activity there.

Our complainant contacted Lakeside Primary School's Principal, Amanda Sarver, and expressed concerns about a school-sponsored field trip to a Christian Day Camp. In a September 16th email, a copy of which was provided to FFRF, Principal Sarver told our complainant, in part:

Thank you for reaching out. I checked with staff who have attended the Family Farm field trip in previous years to clarify what students may experience [. . .]

In the past there has been a brief prayer in the morning after the pledge. Students are not required to participate. **Staff referenced there may also be brief comments that reference being thankful to God.** These are small portions of the day and are not the focus of the field trip.

In response, the parent who contacted us told Principal Sarver the following:

Thank you again for getting back to me and for clarifying what you knew about the Family Farm field trip. I wanted to let you know that, while I am disappointed by what you've shared, [my child] will be attending the field trip. I don't want to exclude [them] from fun school experiences with [their] classmates because of this.

I had hoped that the school would have found a way to make the field trip inclusive of families with different religious beliefs. Instead, I now feel that I need to talk with my five-year-old beforehand about what [they] may see and hear there and explain that [they do] not have to participate in religious activity simply because it is part of an activity [their] school is attending.

I don't think it's fair that a five-year-old should have to grapple with this distinction in the context of a public-school field trip. I would much rather be able to send [them] on a school field trip without having to prepare [them] for the possibility of religious activity. I appreciate you taking the time to respond to my concerns. I just wanted you to understand why I am disappointed and why this has been difficult for me as a parent.

The voluntary nature of the field trip does not make a school-sponsored field trip to a Christian Day Camp constitutional. And our complainant fully articulated why a school field trip involving prayer and religious messaging is deeply problematic for parents and students. Our complainant further told us that:

My concern is not that a private Christian organization exists or that individual students or staff members hold religious beliefs. My concern is that a public elementary school is sponsoring and organizing a kindergarten field trip to a location identified as a Christian day camp, where religious activity has occurred as part of the experience. **The school's response confirms that prayer has been part of the activity in previous years, but I have not received confirmation that the religious component has been eliminated for this year's trip.** I would like my [child] to be able to participate in the educational and social aspects of the field trip with [their] classmates. **At the same time, I do not believe [my child] should have to participate in or be subjected to school-sponsored religious activity as part of a public-school field trip.**

This has caused me significant concern and frustration as a parent. I do not want my five-year-old [child] placed in a situation where [they have] to navigate religious participation at a public-school-sponsored activity. I also feel caught in the position of having to choose between allowing [them] to participate in an activity with [their] classmates and potentially exposing [my child] to religious activity that I do not believe belongs in a public-school program.

We write to request that the District investigate this situation. Lakeside Primary School's October 1st field trip to Family Farm must be completely secular. If that is not possible, it must be cancelled and changed to a secular venue and activity.

Students have the First Amendment right to be free from religious indoctrination in their public schools, including when attending school-sponsored field trips. It is well settled that 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, Lakeside Primary School is taking students on an official school trip to a Christian Day Camp, and Principal Sarver admits that in the past the field trip to this same location included group prayers,

impliedly led by adults, and religious comments from the farm’s staff. Our complainant’s personal experience at Family Farm confirms that the farm conducts religious activities as part of its business. By organizing, facilitating, and sponsoring a field trip to a Christian farm with religious activities, the school, and thus the District, signals clear preference for religion over nonreligion and Christianity over all other faiths.

This field trip likewise violates students’ First Amendment right to be free from school-sponsored religious indoctrination and coercion. The primary school setting is ripe for unconstitutional religious coercion because students that young are especially impressionable and desperate to fit in with their peers. As illustrated by our complainant’s experience, school field trips that include religion force parents into the impossible position of choosing between depriving their child of an exciting social activity and protecting their child from school-sanctioned religious influence. It is further unrealistic to expect students to recognize that their school is violating their constitutional rights and openly dissent at the expense of missing out on a special field trip and potentially enduring bullying or harassment from other students, especially students who are part of the religion that’s being promoted.

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 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). “[T]he 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). Here, Lakeside Primary School is violating parents’ constitutional right to guide their children’s religious or nonreligious upbringing by insisting on taking students on a field trip to a Christian Day Camp that has a history of leading students in prayer and exposing students to religious messaging.

Further, the school’s actions display clear favoritism toward religion over nonreligion, and Christianity over all other faiths. This needlessly marginalizes students who are non-Christians, including those who are nonreligious or members of minority religions. Thirty-eight percent of the American population is non-Christian, including the almost 30 percent who are nonreligious.¹ More than half of Generation Z (those born after 1996) is non-Christian, including 43 percent who are nonreligious.²

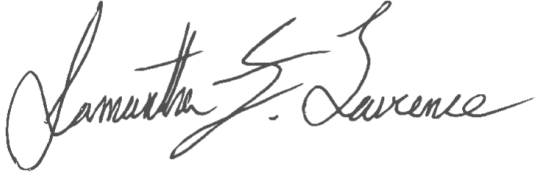
Finally, it is important to understand that voluntariness is not a safeguard against violating students’ First Amendment rights. Courts have summarily rejected arguments that voluntariness excuses a constitutional violation. *See, generally, Lee*, 505 U.S. at 596 (“It is a tenet of the First Amendment 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 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 . . . The Establishment Clause focuses on the constitutionality of the state action, not on the choices made by the complaining individual.”). The District may not avoid constitutional liability by claiming participation in this field trip is voluntary for students.

¹ Pew Research Center (2024), <http://bit.ly/3W6Cl3m>.

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

The District must investigate and ensure that Lakeside Primary School's October 1st field trip to Family Farm will not include religious activity. If that is not possible, the field trip must be changed to a secular venue and activity. All school-sponsored events, including field trips, must be free from school-sponsored religious activities or religious messaging. Please respond in writing with the steps the District is taking to address this constitutional violation so that 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

Enclosure

FAMILY FARM

CHRISTIAN DAY CAMP

18448 HWY 67 | MALVERN, AR 72104

info@familyfarm.org | 501.337.4171

2026 PUMPKIN PATCH FIELD TRIP RELEASE FORM

School: Lakeside Primary
Grade: Kindergarten
Teacher's Name: Dean
Date of Field Trip: Oct. 1, 2026

I, _____, being the parent/legal guardian of
(Parent's/Legal Guardian's Name PRINTED)

(Name of Student)

hereby release Family Farm Christian Day Camp, their owners, successors, and any employee(s) from any and all liability for loss, damage, injury, death, illness, or any other claim while in participation in activities associated with Family Farm Christian Day Camp for myself, my children, and wards.

Parent Signature: _____

thank you!

Today's Date: _____

