

FREEDOM FROM RELIGION *foundation*

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

September 9, 2026

SENT VIA EMAIL & U.S. MAIL: neal.smith@pike.kyschools.us

Neal Smith
Board Attorney
Pike County Schools
316 S. Mayo Trl.
Pikeville, KY 41501

Re: Unconstitutional “prayer walk” event

Dear Attorney Smith:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional violation occurring in Pike County Schools. As you may recall, FFRF is a national nonprofit organization with over 41,000 members across the country, including hundreds of members and a chapter in Kentucky. Our purposes are to protect the constitutional principle of separation between state and church, and to educate the public on matters relating to nontheism. If you are no longer counsel for the district, please advise.

A concerned District community member has reported that Mullins Elementary organized, promoted, and encouraged attendance at a religious prayer walk event on August 2, 2026. A post on Mullins Elementary’s official Facebook page invites the community to a “Prayer Walk” event. It says, “Join the Mullins School community to pray for every area of our school.” It also quotes Philippians 4:6, “Do not worry. Instead, pray and ask God for what you need with a thankful heart.” Please see the enclosed screenshot.

We write to request that the District immediately cease organizing, promoting, and encouraging attendance at religious events, and ensure that all future school-sponsored events are entirely secular.

Public schools may not show favoritism toward or coerce belief or participation in religion. *See generally 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 is displaying blatant favoritism towards religion over nonreligion by asking the school community to participate in a Christian prayer event.

The District serves a diverse population that consists of not only religious students, families, and employees, but also atheists, agnostics, and those who are simply religiously unaffiliated. An

invitation from the District to “join the school community to pray” sends an official message that excludes all nonreligious District students and community members. 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

The District must cease organizing, promoting, and encouraging attendance at religious events going forward. All school-sponsored events must be completely secular in order to respect the constitutional rights of students, families, and employees. Please respond in writing with the steps the District is taking to address this situation so that we may inform our complainant. Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Charlotte R. Gude". The signature is fluid and cursive, with the first name "Charlotte" being more prominent than the last name "Gude".

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

Enclosure

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

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



Mullins School

July 31 · 🌐



Tigers Prayer Walk

Join the Mullins School community
to pray for every area of our school.

Sunday, August 2, 2026
3 pm
Mullins School

Philippians 4:6 ~ Do not worry. Instead, pray and
ask God for what you need with a thankful heart.