

August 25, 2014

Via Email

Dr. Cedrick Gray, Superintendent
Jackson Public School District
superintendent@jackson.k12.ms.us

Re: Unconstitutional Religious Proselytization at Mandatory Teacher Convocation

Dear Dr. Gray,

Our office recently received a complaint that the Jackson Public School District (“School District”) held a mandatory convocation for public school teachers that included a proselytizing sermon and prayer delivered by a Christian Reverend.¹ The event was held on August 12, 2014, at the Mississippi Coliseum. The teachers, who were required to attend, were transported to the event in school busses. Reverend Roy Maine was invited by the School District to deliver the opening prayer.

The Reverend began his sermon by asking the entire faculty to “shut your eyes please” and pray. Following that was a series of “call and responses” where he would ask the teachers, “please say amen to that,” to which they would respond, “amen!” The Reverend said that the reason they were all there was to “to see just what God’s going to do this [school] year.” He preached, “Glory, Glory, Glory, to God in the highest in honor of peace and good [widow]” and asked everyone to repeat those words with him. Afterwards, he proclaimed: “this is the time to stand for God.” He proceeded to deliver a prayer from Psalm 23, asking everyone to repeat after him, “The Lord is my Shepherd,” “I shall not want” “He maketh me to lie down in green pastures” “he leadeth me beside the still waters” “He restoreth my soul: he leadeth me in the paths of righteousness for his name’s sake” “Yea, though I walk through the valley of the shadow of death, I will fear no evil: for thou art with me; thy rod and thy staff they comfort me. Thou preparest a table before me in the presence of mine enemies: thou anointest my head with oil; my cup runneth over. Surely goodness and mercy shall follow me all the days of my life: and I will dwell in the house of the Lord for ever.” Reverend Maine concluded with what appeared to be a reference to 1 Corinthians 4:5, asking everyone to say “Amen.”

The religious proselytization did not end with the Reverend’s sermon. Nearly every speaker at this three-hour event engaged in some form of religious preaching, recitation of Bible verses, and invocation to “Lord” and “God.” The event was best described by our client as “one long church service.”

¹ A video of the sermon can be viewed here: <http://www.youtube.com/watch?v=i66sb09t4TM&feature=share>.

² The test is derived from *Lemon v. Kurtzman*, 403 U.S. 602, 612 (1971).

³ See *Wallace v. Jaffree*, 472 U.S. 38, 40-42 (1985) (school prayer and meditation unconstitutional); *Sch. Dist. Abington v. Schempp*, 374 U.S. 203, 205 (1963) (daily scripture readings unconstitutional); *Engel v. Vitale*, 370 U.S. 421, 422-23

Unfortunately, this was not the first time the School District included religious proselytization in a mandatory school function. The School District invited the same minister to give the closing prayer at the 2013 convocation. The Reverend delivered a five-minute sermon, which included references to the same Bible passages as those in the 2014 convocation. The 2013 sermon similarly called for faculty participation vis-à-vis call-and-response preaching.

Our client, a teacher in your School District, was required to attend the convocation (both in 2013 and in 2014) and was troubled by the school's actions in overtly endorsing religion and Christianity specifically. Under well-settled Establishment Clause jurisprudence, *infra*, the School District's actions mark a clear breach of the United States Constitution. This letter demands assurances that the School District will refrain from including religious elements in school-sponsored events and specifically at future convocations.

The American Humanist Association ("AHA") is a national nonprofit organization with over 30,000 members and supporters across the country, including many in Mississippi, and an online following of over 300,000. The Appignani Humanist Legal Center, AHA's legal arm, includes a network of cooperating attorneys from around the country. The center has litigated cases involving church-state separation and the rights of Humanists, other non-theists, as well as Christians, in state and federal courts nationwide.

The First Amendment's Establishment Clause "commands a separation of church and state." *Cutter v. Wilkinson*, 544 U.S. 709, 719 (2005). It requires the "government [to] remain secular, rather than affiliate itself with religious beliefs or institutions." *Cnty. of Allegheny v. ACLU*, 492 U.S. 573, 610 (1989). Not only must the government not endorse, advance, promote, affiliate with, or favor any particular religion, it "may not favor religious belief over disbelief." *Id.* at 593 (citation omitted). Indeed, the Establishment Clause "create[s] a complete and permanent separation of the spheres of religion activity and civil authority." *Everson v. Bd. of Ed.*, 330 U.S. 1, 31-32 (1947). Separation "means separation, not something less." *McCullum v. Bd. of Ed.*, 333 U.S. 203, 231 (1948). In "no activity of the State is it more vital to keep out divisive forces than in its schools, to avoid confusing, not to say fusing, what the Constitution sought to keep strictly apart." *Id.*

To comply with the Establishment Clause, a government practice must pass the *Lemon* test,² pursuant to which it must: (1) have a secular purpose; (2) not have the effect of advancing or endorsing religion; and (3) not foster excessive entanglement with religion. *Allegheny*, 492 U.S. at 592. Government action "violates the Establishment Clause if it fails to satisfy any of these prongs." *Edwards v. Aguillard*, 482 U.S. 578, 583 (1987).

With these principles in mind, the Supreme Court has specifically ruled that prayers at school-sponsored events are unconstitutional. *See Santa Fe Indep. Sch. Dist. v. Doe*, 530 U.S. 290, 308 (2000) (football games); *Lee v. Weisman*, 505 U.S. 577, 592 (1992) (graduation ceremonies). Indeed, *Lee* and *Santa Fe* are "merely the most recent in a long line of cases carving out of the Establishment Clause what essentially amounts to a per se rule prohibiting public-school-related or -initiated religious expression or indoctrination." *Doe v. Duncanville Indep. Sch. Dist.*, 994 F.2d 160, 165 (5th Cir. 1993).

² The test is derived from *Lemon v. Kurtzman*, 403 U.S. 602, 612 (1971).

The Supreme Court has issued numerous decisions “of considerable parentage that prohibits prayer in the school classroom or environs.” *Id.* at 164.³ The same is true of Fifth Circuit cases.⁴

A religious activity is “state-sponsored,” and therefore unconstitutional, if “an objective observer . . . w[ould] perceive official school support for such religious [activity].” *Board of Educ. v. Mergens*, 496 U.S. 226, 249-50 (1990). *See, e.g., Santa Fe*, 530 U.S. at 309-10 (holding that student-initiated, student-led prayers at public high school football game were unconstitutional). Whenever an invocation “occurs at a school-sponsored event . . . the conclusion is inescapable that the religious invocation conveys a message that the school endorses” it. *Jager v. Douglas County Sch. Dist.*, 862 F.2d 824, 831-32 (11th Cir. 1989). There is no question that the convocation was a school-sponsored event. The day before the event, teachers were sent the following email from the administration:

From: Anderson, Darryl
Sent: Monday, August 11, 2014 2:51 PM
To: District Employees
Subject: Reminder: Convocation at the Mississippi Coliseum Tuesday, August 12, 2014, at 9:00 a.m.

All Jackson Public Schools' (JPS) employees must attend the back-to-school employee convocation to be held Tuesday, August 12, 2014, at 9:00 a.m. at the Mississippi Coliseum located at 1207 Mississippi Street, Jackson, MS. Transportation is being provided by the JPS Transportation Department.
The theme is “JPS 2.0 Reboot and Upgrade - Beginning Again with the End in Mind.”
Make sure to put on your “HAPPY” face as you enter the coliseum. The JPS Instructional Television Department will be recording a District-wide employee “HAPPY” video. Once you hear the “HAPPY” song, do your “HAPPY” dance and your talents just might catch the attention of our professional videographers.
Let’s show how “HAPPY” we are for the new school year!

In addition to the email, the School District’s website listed the event on its calendar and provided the following information:

First Day for Teachers & Convocation
8/12/14 7:30 AM - 8/12/14 5:00 PM
The first day of school for JPS teachers is Tuesday, August 12, 2014. The day will begin with Convocation at 9 a.m. at the Mississippi Coliseum. The program

³ *See Wallace v. Jaffree*, 472 U.S. 38, 40-42 (1985) (school prayer and meditation unconstitutional); *Sch. Dist. Abington v. Schempp*, 374 U.S. 203, 205 (1963) (daily scripture readings unconstitutional); *Engel v. Vitale*, 370 U.S. 421, 422-23 (1962) (school prayer unconstitutional).

⁴ *See Doe v. Sch. Bd.*, 274 F.3d 289, 294 (5th Cir. 2001) (statute authorizing prayer in classrooms unconstitutional); *Doe v. Santa Fe Indep. Sch. Dist.*, 168 F.3d 806, 816 (5th Cir. 1999), *aff’d*, 530 U.S. 290 (2000) (football prayers unconstitutional); *Ingebretsen v. Jackson Pub. Sch. Dist.*, 88 F.3d 274, 280 (5th Cir. 1996); *Doe v. Duncanville Indep. Sch. Dist.*, 70 F.3d 402, 407 (5th Cir. 1995) (*Duncanville II*) (prayers preceding basketball games violated Establishment Clause); *Duncanville I*, 994 F.2d at 163; *Karen B. v. Treen*, 653 F.2d 897 (5th Cir. 1981), *aff’d*, 455 U.S. 913 (1982) (classroom prayers by students and teachers unconstitutional); *Hall v. Board of Sch. Comm’rs*, 656 F.2d 999, 1003 (5th Cir. 1981) (permitting students to conduct morning devotional readings over the school's public address system violated Establishment Clause); *Meltzer v. Bd. of Pub. Instruction*, 548 F.2d 559, 574 (5th Cir. 1977) (en banc) (same). *See also Herdahl v. Pontotoc County Sch. Dist.*, 933 F. Supp. 582, 591 (N.D. Miss. 1996) (same).

is a district-wide assembly of all JPS employees. JPS employees will also participate in professional development sessions throughout the day.⁵

It is well settled that prayers delivered at public school functions such as graduation ceremonies violate the Establishment Clause. *Lee*, 505 U.S. at 590-92 (nonsectarian prayer at graduation held unconstitutional). *See Santa Fe*, 168 F.3d at 816 (permitting students to deliver sectarian prayers violated Establishment Clause); *Lassonde v. Pleasanton Unified Sch. Dist.*, 320 F.3d 979, 983 (9th Cir. 2003) (student-delivered religious speech at graduation is unconstitutional); *Cole v. Oroville Union High Sch. Dist.*, 228 F.3d 1092, 1104 (9th Cir. 2000) (same); *ACLU v. Black Horse Pike Reg'l Bd. of Educ.*, 84 F.3d 1471, 1488 (3d Cir. 1996) (school policy that “permits a student to give a sectarian, proselytizing address” at graduation violates Establishment Clause); *Harris v. Joint Sch. Dist. No. 241*, 41 F.3d 447, 454 (9th Cir. 1994), *judgment vacated on other grounds*, 62 F.3d 1233 (9th Cir. 1995) (graduation prayers were unconstitutional) (citation omitted).⁶

In addition to graduation ceremonies, courts have also ruled that prayer at public school awards ceremonies and assemblies are unconstitutional. *See A.M. v. Taconic Hills Cent. Sch. Dist.*, 510 Fed. Appx. 3, 7-8 (2d Cir. 2013), *cert. denied*, 134 S. Ct. 196 (2013) (“The Ceremony constituted ‘school-sponsored expressive activities’” in which “a reasonable observer would perceive [the student’s religious] speech as being endorsed by the Middle School”); *Ingebretsen*, 88 F.3d at 280 (assemblies and other school sponsored events); *Collins v. Chandler Unified Sch. Dist.*, 644 F.2d 759, 760-63 (9th Cir. 1981) (student assembly); *S.D. v. St. Johns County Sch. Dist.*, 632 F. Supp. 2d 1085, 1100 (M.D. Fla. 2009) (same); *Golden v. Rossford Exempted Vill. Sch. Dist.*, 445 F. Supp. 2d 820, 823-25 (N.D. Ohio 2006) (same). *See also Mellen v. Bunting*, 327 F.3d 355, 367, 370-72 (4th Cir. 2003) (supper prayers at military school unconstitutional).

Prayers initiated by school officials are clearly prohibited by the Establishment Clause. *See Karen B. v. Treen*, 653 F.2d 897 (5th Cir. 1981), *aff’d*, 455 U.S. 913 (1982) (statute permitting teacher-led prayers upon the request of students held unconstitutional); *Borden v. Sch. Dist.*, 523 F.3d 153, 174 (3rd Cir. 2008) (coach silently bowing head and kneeling while team prayed violated Establishment Clause); *Holloman v. Harland*, 370 F.3d 1252, 1285 (11th Cir. 2004) (teacher’s practice of initiating

⁵ <http://www.jackson.k12.ms.us/content.aspx?eid=201&url=/page/calendar&> (last viewed August 13, 2014).

⁶ *See also Workman v. Greenwood Cmty. Sch. Corp.*, 2010 U.S. Dist. LEXIS 42813, *27 (S.D. Ind. 2010) (school’s practice “permitting a student-led prayer at [the graduation] represents a clear violation of the Establishment Clause”); *Doe v. Gossage*, 2006 U.S. Dist. LEXIS 34613, *1, *19-20 (W.D. Ky. 2006) (“allowing [student] prayer at the high school graduation ceremony” violated Establishment Clause); *Ashby v. Isle of Wight County Sch. Bd.*, 354 F. Supp. 2d 616, 629-30 (E.D. Va. 2004) (“the decision not to allow the students to [deliver a religious song] was necessary to avoid violating the Establishment Clause”); *Deveney v. Bd. of Educ.*, 231 F. Supp. 2d 483, 485-88 (S.D. W.Va. 2002) (ordering school board “enjoined and restrained from allowing . . . the presentation of an invocation [by a student] . . . at the graduation exercises for St. Albans High School”); *Skarin v. Woodbine Cmty. Sch. Dist.*, 204 F. Supp. 2d 1195, 1198 (S.D. Iowa 2002) (“[t]he singing of ‘The Lord’s Prayer’ by the Woodbine High School choir at the school graduation ceremony. . . violates the Establishment Clause” as the “Supreme Court cases [] bar prayer from public school graduation ceremonies”); *Appenheimer v. Sch. Bd.*, 2001 WL 1885834, *1, *6-9 (C.D. Ill. 2001) (holding that “allowing student-led prayer violates the First Amendment” and enjoining school board “from having a student-led prayer at its commencement ceremony”); *Gearon v. Loudoun County Sch. Bd.*, 844 F. Supp. 1097, 1098-100 (E.D. Va. 1993) (“permitting prayer in a . . . high school graduation is a violation of the Establishment Clause”); *Lundberg v. W. Monona Cmty. Sch. Dist.*, 731 F. Supp. 331, 333, 345-46 (N.D. Iowa 1989) (“an invocation and benediction at a public high school graduation ceremony violates the establishment-of-religion clause”); *Graham v. Central Community School Dist.*, 608 F. Supp. 531, 537 (S.D. Iowa 1985) (holding that the school district’s “inclusion of a religious invocation and a religious benediction as part of its graduating ceremonies violates the Establishment Clause”); *Committee for Voluntary Prayer v. Wimberly*, 704 A.2d 1199 (D.C. 1997) (initiative to allow prayer at public school events unconstitutional); *Sands v. Morongo Unified Sch. Dist.*, 53 Cal. 3d 863, 878-79 (1991), *cert. denied*, 505 U.S. 1218 (1992).

silent prayer with her students violated Establishment Clause); *Duncanville II*, 70 F.3d 402 (school's practice of allowing coaches to participate in student prayers during athletic events violated Establishment Clause); *Duncanville I*, 994 F.2d at 163 (same); *Steele v. Van Buren Public Sch. Dist.*, 845 F.2d 1492, 1493 (8th Cir. 1988) (permitting teachers to conduct prayer and religious activity at mandatory school functions unconstitutional).⁷

The courts have even ruled that student-led prayers delivered at purely voluntary events such as football games violate the Establishment Clause. See *Santa Fe*, 530 U.S. at 316 (football games); *Duncanville II*, 70 F.3d at 407 (basketball games); *Duncanville I*, 994 F.2d 160; *Jager*, 862 F.2d at 830 (football games); *Doe v. Aldine Indep. Sch. Dist.*, 563 F. Supp. 883, 866-88 (S.D. Tex. 1982).

Given the clarity of the jurisprudence, it shocks the conscience that the School District included a prayer, by a Christian pastor, at a formal, and indeed mandatory, school-sponsored event.

Turning to the facts here, the School District's actions violate the Establishment Clause pursuant to the first prong of the *Lemon* test. In applying this test, the courts have made clear that because "prayer is 'a primary religious activity in itself,'" a "teacher or administrator's intent to facilitate or encourage prayer in a public school is *per se* an unconstitutional intent to further a religious goal." *Holloman*, 370 F.3d at 1285. See also *Santa Fe*, 530 U.S. at 309 ("infer[ring] that the specific purpose of the policy" permitting prayers was religious thus failing the purpose prong); *Jaffree v. Wallace*, 705 F.2d 1526, 1534-35 (11th Cir. 1983), *aff'd*, 472 U.S. 38 (1985); *Jager*, 862 F.2d at 830 (where school officials sponsor an "intrinsically religious practice" such as prayer, even if student-led, it "cannot meet the secular purpose prong").⁸

Yet, regardless of the purposes motivating it, the School District's actions fail *Lemon's* effect prong. The "effect prong asks whether, irrespective of government's actual purpose, the practice under review in fact conveys a message of endorsement or disapproval [of religion]." *Wallace*, 472 U.S. at 56 n.42 (quotation marks omitted). See also *Santa Fe*, 168 F.3d at 817 (same). The "prohibition against governmental endorsement of religion 'preclude[s] government from conveying or attempting to convey a message that religion or a particular religious belief is favored or preferred.'" *Allegheny*, 492 U.S. at 593 (citation omitted). Whether "the key word is 'endorsement' 'favoritism,' or 'promotion,' the essential principle remains the same. The Establishment Clause, at the very least, prohibits government from appearing to take a position on questions of religious belief[.]" *Id.* at 593-94. Accordingly, schools cannot "sponsor the . . . religious practice of prayer," *Santa Fe*, 530 U.S. at 313,

⁷ See also *Doe v. Wilson Cty. Sch. System*, 564 F. Supp. 2d 766 (M.D. Tenn. 2008) (holding that principal and kindergarten teacher who bowed their heads during a nonschool sponsored prayer event and wore 'I Prayed' stickers during instructional time violated Establishment Clause); *Daugherty v. Vanguard Charter Sch. Academy*, 116 F. Supp. 2d 897, 910 (W.D. Mich. 2000) ("The presence of teachers and elementary students together, for prayer, on school premises, albeit during non-instructional hours, is a matter of heightened concern."); *Carlino v. Gloucester City High Sch.*, 57 F. Supp. 2d 1 (D.N.J. 1999), *aff'd*, 44 Fed. Appx. 599 (3rd Cir. 2002) (principal's involvement with a baccalaureate service unconstitutional); *Sease v. Sch. Dist.*, 811 F. Supp. 183, 192 (E.D. Pa. 1993) ("Clearly, a school employee's participation in, or sponsorship of, a public school gospel choir during school hours would be a violation of the Establishment Clause."); *Quappe v. Endry*, 772 F. Supp. 1004 (S.D. Ohio 1991), *aff'd*, 979 F.2d 851 (6th Cir. 1992) (participation of teacher in religious club for students meeting in elementary school directly after close of school day established "symbolic nexus between the school and the club, thus providing the active government participation necessary to find a constitutional violation"); *Breen v. Runkel*, 614 F. Supp. 355 (W.D. Mich. 1985) (teachers praying and reading Bible in classrooms unconstitutional).

⁸ See also *North Carolina Civil Liberties Union v. Constangy*, 947 F.2d 1145, 1150 (4th Cir. 1991) (finding religious purpose in judge's practice of opening court sessions with prayer, as it involved "an act so intrinsically religious"); *Collins*, 644 F.2d at 760-63 ("the invocation of assemblies with prayer has no apparent secular purpose"); *Hall v. Bradshaw*, 630 F.2d 1018, 1020-21 (4th Cir. 1980).

or otherwise permit any “of its teachers’ activities [to] give[] the impression that the school endorses religion.” *Marchi v. Board of Coop. Educ. Servs.*, 173 F.3d 469, 477 (2d Cir. 1999).

A public school’s actions in encouraging and facilitating “prayer clearly fosters and endorses religion over nonreligion, and so runs afoul of the First Amendment.” *Holloman*, 370 F.3d at 1288. A prayer, “because it is religious, . . . advance[s] religion.” *Hall*, 630 F.2d at 1021. Whenever a prayer “occurs at a school-sponsored event . . . the conclusion is inescapable that . . . the school endorses” it. *Jager*, 862 F.2d at 831-32. In *Santa Fe*, the Supreme Court ruled that even student-initiated, student-led prayers at high school football games, where attendance is completely voluntary, result in “both perceived and actual endorsement of religion” in violation of the Establishment Clause. 530 U.S. at 305, 310. As in *Santa Fe*, the invocation (and proselytizing sermon) here was “delivered to a large audience assembled as part of a regularly scheduled, school-sponsored function.” *Id.* at 307. But unlike in *Santa Fe*, the religious activity here was neither student-initiated nor student-led, making the religious endorsement even more concerning. Rather, the School District invited a religious leader to deliver the invocation, thus violating Establishment Clause jurisprudence pursuant to *Lee*.

In *Lee*, the Supreme Court admonished that “[a] school official . . . decided that an invocation and a benediction should be given; this is a choice attributable to the State, and from a constitutional perspective it is as if a state statute decreed that the prayers must occur.” 505 U.S. at 587. Moreover, in *Lee*, as here, a school official “chose the religious participant,” and “that choice is also attributable to the State.” *Id.* In fact, the invocation and sermon delivered at Jackson School District’s event was more egregious than the non-sectarian prayer in *Lee* because in *Lee*, the graduation ceremony was “technically voluntary” whereas here, teachers were actually required to attend and were repeatedly asked to participate in the religious activities, *supra*. Consequently, “an objective observer” would inevitably “perceive [the prayers] as a state endorsement.” *Santa Fe*, 530 U.S. at 308.

Finally, the School District’s actions foster excessive entanglement with religion, thus violating the Establishment Clause under *Lemon’s* third prong. See *Duncanville*, 70 F.3d at 406 (faculty’s participation in “prayers improperly entangle[d] [the school] in religion”); *Karen B.*, 653 F.2d at 902 (permitting teachers to lead prayers would result in “excessive governmental entanglement with religion.”); *Mellen*, 327 F.3d at 375 (university’s sponsorship of prayer failed “*Lemon’s* third prong.”); *Constangy*, 947 F.2d at 1151-52 (when “a judge prays in court, there is necessarily an excessive entanglement of the court with religion.”); *Hall*, 630 F.2d at 1021 (prayer on a state map fostered unconstitutional entanglement).

In short, the School District’s actions violate the Establishment Clause under *all three* prongs of *Lemon*. That the convocation was for public school teachers rather than students does not change this conclusion. For instance, courts have made clear that prayers delivered at school board meetings are unconstitutional regardless of whether students are present.⁹ In *Warnock v. Archer*, 380 F.3d 1076 (8th Cir. 2004), the Eighth Circuit explicitly held that a school’s practice of including prayers at mandatory teacher-training meetings was unconstitutional. The court reasoned that the practices were “constitutionally infirm not because they offended [the teacher] but because they endorsed religion.” *Id.* at 1080. The court stressed that “prayers at mandatory teacher meetings and in-service training

⁹ See *Doe v. Indian River Sch. Dist.*, 653 F.3d 256, 285 (3d Cir. 2011); *Doe v. Tangipahoa Parish Sch. Bd.*, 473 F.3d 188, 203 n.2 (5th Cir. 2006), *vacated on standing grounds*, 494 F.3d 494 (5th Cir. 2007) (holding that a reasonable observer would perceive the prayers as affiliating the school board with Christianity); *Bacus v. Palo Verde Unified Sch. Dist. Bd. of Ed.*, 52 Fed. Appx. 355 (9th Cir. 2002) (in teachers’ lawsuit against school district, court held that school board violated Establishment Clause in allowing prayers at board meetings); *Coles ex rel. Coles v. Cleveland Bd. of Educ.*, 171 F.3d 369 (6th Cir. 1999) (same).

conveys” “a decisive endorsement.” *Id.* See also *Young v. Southwestern Sav. & Loan Asso.*, 509 F.2d 140, 141 (5th Cir. 1975); *Venters v. City of Delphi*, 123 F.3d 956, 970 (7th Cir. 1997); *Constangy*, 947 F.2d at 1151 (judge’s practice of opening court sessions with prayer held unconstitutional); *Moeller v. Bradford County*, 444 F. Supp. 2d 316, 335-36 (M.D. Pa. 2006) (“the Establishment Clause prohibits religious discrimination in public employment”).

In view of the aforementioned authorities, it is clear that the School District is in violation of the Establishment Clause. As such, the School District may be sued under 42 U.S.C. § 1983 for damages, an injunction, and attorneys’ fees. This letter serves as an official notice of the unconstitutional activity and demands that the School District terminate this and any similar illegal activity immediately. To avoid legal action, we kindly ask that you notify us in writing within two weeks of receipt of this letter setting forth the steps you will take to rectify this constitutional infringement. Thank you for turning your attention to this important matter.

Sincerely,
Monica Miller, Esq.

Enclosed Screenshots of School District Website

Building Stronger Schools Together!
 Jackson Public Schools
 Jackson, Mississippi

Building Tomorrow Today
[Calendar](#) | [Directory](#) | [Email Alerts](#) | [Feedback Form](#)
[Site Help](#) | [Site Map](#) | [Employee Email Login](#)

SEARCH THE SITE GO

[About JPS](#) | [Departments](#) | [Schools](#) | [Employment](#) | [Teachers](#) | [Parents & Students](#) | [Community & Volunteers](#) | [News Room](#)

[Progress Reports & Report Cards](#)
[School Board Meetings](#)
[MDE Testing Calendar \(PDF\)](#)

Home > [About Us](#) > JPS District Calendar

2014-2015 District Calendar

July 1-4, 2014	District-Wide Closure
August 12, 2014	Teachers Report/Convocation/ Building Level Professional Development
August 13-15, 2014	Building Level Professional Development/ Classroom Organization Day
August 18, 2014	Students Report
September 1, 2014	Labor Day Holiday

Building Stronger Schools Together!
 Jackson Public Schools
 Jackson, Mississippi

Building Tomorrow Today
[Calendar](#) | [Directory](#) | [Email Alerts](#) | [Feedback Form](#)
[Site Help](#) | [Site Map](#) | [Employee Email Login](#)

SEARCH THE SITE GO

[About JPS](#) | [Departments](#) | [Schools](#) | [Employment](#) | [Teachers](#) | [Parents & Students](#) | [Community & Volunteers](#) | [News Room](#)

Home > [Calendar](#)

First Day for Teachers & Convocation

8/12/14 7:30 AM - 8/12/14 5:00 PM

The first day of school for JPS teachers is **Tuesday, August 12, 2014**. The day will begin with Convocation at 9 a.m. at the Mississippi Coliseum. The program is a district-wide assembly of all JPS employees. JPS employees will also participate in professional development sessions throughout the day.

[Back](#)

[Home](#) | [About JPS](#) | [Departments](#) | [Schools](#) | [Employment](#) | [Teachers](#) | [Parents & Students](#) | [Community & Volunteers](#) | [News Room](#)
[Calendar](#) | [Directory](#) | [Email Alerts](#) | [Feedback](#) | [Site Map](#) | [Site Search](#) | [Employee Email Login](#)
 E-mail Web Manager Jackson Public Schools, PO Box 2338, Jackson, MS 39225-2338 · 601-960-8700 8/11/2014 © 2005 - 2014
[Terms and Conditions](#)