



1241 N FRANKLIN PLACE
MILWAUKEE WI 53202
WILL-LAW.ORG
414.727.9455

June 30, 2026

Sent via Email to:

Arrowhead Union High School District
700 North Avenue
Hartland, WI 53029

Conrad Farner, Superintendent (farner@arrowheadschoools.org)

Members of the Board of Education (schoolboard@arrowheadschoools.org)

Re: Violation of Student First Amendment Rights at Graduation

Dear Superintendent Farner and Members of the School Board:

The Wisconsin Institute for Law & Liberty (WILL) represents Sarianne Beronja regarding the decision by Arrowhead Union High School District officials to prohibit her from including a Bible verse in her graduation slideshow submission for the June 6, 2026 commencement ceremony. In addition to representing Ms. Beronja, WILL also represents her mom, Lora Engel, who has younger children, including a daughter who will soon attend Arrowhead High School.

WILL has serious concerns that the District violated Ms. Beronja's rights under the Free Speech Clause and Free Exercise Clause of the First Amendment by excluding her expression solely because it conveyed a religious viewpoint. The District also risks violating the First Amendment rights of future graduating students.

Factual Background

As she approached graduation, Ms. Beronja looked forward to participating in the same traditions as her classmates, including the opportunity to submit a personal message to accompany her graduation slide. On the Wednesday before commencement, Ms. Beronja submitted Proverbs 3:6: "In all your ways, acknowledge Him, and He shall direct your path." The verse reflected the faith that had guided her throughout high school and the values she intended to carry into the future.

For two days, Ms. Beronja heard nothing from the District. Then, at 11:46 p.m. on the night before graduation—less than twenty-four hours before she would walk across the stage—the District informed her that she could not use the verse because it was religious. Specifically, Ms. Beronja received an email from the associate principal stating the District was "unable to use [her] quote due to School Board Policy as it references religion" and asking for a new quote.

Faced late at night with the prospect of graduation the very next day, Ms. Beronja scrambled to submit a non-religious replacement statement in an effort to comply with the District's directive, and she sent an alternative less than an hour after the initial denial. Yet after further reflection on the morning of graduation, after a few hours of sleep, she realized that the substitute message failed to capture an essential part of her journey. Several hours before the ceremony, she emailed District officials again and requested permission to use a simple statement of personal gratitude: "All thanks to God for being beside me through these last four years." The District rejected that request as well.

As a result, Ms. Beronja was denied the opportunity to include any expression of the faith that had shaped her high school experience, despite the fact that other students were permitted to submit personal messages of their choosing. One student quoted rapper Wiz Khalifa, another referenced the TV show Love Island, and another included her Venmo account and asked for financial support for college.

At no point was Ms. Beronja seeking to lead a prayer, conduct a religious exercise, or encourage anyone else to participate in a religious activity. She sought only to include a brief personal statement on her own graduation slide reflecting the role that faith played in her life. The District nevertheless prohibited both a Bible verse and a simple expression of gratitude to God because they conveyed a religious viewpoint—yet permitted a wide range of other personal expressions and viewpoints.

The District's public justification for silencing Ms. Beronja is further undermined by its own recent practice. Not only did the District permit a wide range of personal expressions in this year's ceremony, but the District has permitted religious expressions in recent years. Multiple graduating students in 2024 and 2025 were permitted to express religious viewpoints, thank God, quote scripture, and cite specific Bible verses. Yet when Ms. Beronja sought to express substantially similar sentiments in 2026, the District prohibited her message. The District should explain why religious expression was permitted for prior graduates but forbidden for Ms. Beronja.

Legal Analysis

The First Amendment does not permit public schools to suppress student speech merely because it is religious. Religious speech is protected speech, and public schools may not discriminate against speech because it reflects a religious perspective.

Here, the critical question is not whether Arrowhead permitted students to express themselves. It plainly did. Students were invited to submit personal messages to accompany their graduation slides, and the District approved a wide variety of personal expressions, including statements of gratitude, inspirational messages, humor, pop culture references, song lyrics, and even requests for financial support. The question is whether students were permitted to express themselves only if their message was non-religious. The answer appears to be yes.

A student who thanked parents, coaches, teachers, or friends could apparently participate. A student who thanked God could not. A student who shared an inspirational message from Batman could apparently participate. A student who shared an inspirational verse from the Bible could not. Such a distinction is quintessential viewpoint discrimination.

The District's Reliance on *Hazelwood* is Misplaced.

The U.S. Supreme Court has long recognized that students do not “shed their constitutional rights to freedom of speech or expression at the schoolhouse gate.” *Tinker v. Des Moines Ind. Sch. Dist.*, 393 U.S. 503, 506 (1969). While schools possess authority to regulate speech that materially disrupts school operations, is vulgar, or promotes illegal drug use, the First Amendment does not permit schools to suppress speech simply because administration disagrees with—or is uncomfortable with—the speaker’s religious viewpoint.

Ms. Beronja’s proposed messages were respectful, non-disruptive, and entirely appropriate for a graduation ceremony. The District has never suggested otherwise.

Superintendent Farner has [publicly relied on](#) *Hazelwood School District v. Kuhlmeier*, 482 U.S. 912 (1987), to justify the actions of the District. That reliance is misplaced. As the Seventh Circuit recently explained in *N.J. by Jacob v. Sonnabend*, 37 F.4th 412, 424 (7th Cir. 2022), *Hazelwood* addresses circumstances in which a school is asked to sponsor or endorse student expression as its own. The case concerned a school newspaper that was funded, supervised, and published by the school itself. The issue was whether the school was required to promote particular student speech through its own publication. *Id.* (“[T]he question was not whether the school must *tolerate* particular student speech but whether it must *affirmatively promote* particular student speech.” (Emphasis in original.))

Promotion of student speech is not what occurred here. Ms. Beronja was not asking the District to endorse her religious beliefs. She was simply asking the District to permit a brief personal statement on her individual graduation slide in the same way it permitted students to share non-religious messages.

Superintendent Farner has emphasized that students’ expression of their religious beliefs “may be limited to lunch periods or other non-instructional time periods when students are free to associate, or on an individual basis in a manner that does not disrupt the educational process.” As you know, your [school board policy on religious activities](#) also explicitly allows students to engage “in the free, individual, and voluntary exercise or expression of the student’s religious beliefs.” The scripture quote

requested by Ms. Beronja was on an individual basis, occurred during non-instructional time,¹ and surely would not have disrupted the educational process.²

Even assuming the graduation slideshow constitutes a school-sponsored expressive activity, *Hazelwood* does not grant schools authority to engage in viewpoint discrimination. The District’s implementation of this policy appears to have singled out religious viewpoints for exclusion while allowing comparable non-religious expression. If a school allows non-curricular, non-religious student speech, it must allow religious speech under the same terms. *Good News Club v. Milford Central Sch.*, 533 U.S. 98, 109–12 (2001).

District Administration Allowed Non-Religious Personal Statements and Has Allowed Religious Graduation Quotes in Past Years.

Additionally, the District’s actions are difficult to reconcile with the broad range of personal expression it permitted. Students were allowed to express gratitude, personal philosophies, inspirational messages, humor, pop culture references, and even requests for financial support through Venmo. Yet Ms. Beronja was prohibited from including a Bible verse that reflected the faith that guided her through high school.

Not only this, but in 2024 and 2025, students were permitted to include religious messages, references to God, and quotes from scripture.³ Approved messages included:

“Joshua 1:9 – Be strong and courageous, the Lord your God is with you.”

“Matt. 28:20 – I am with you always, even unto the end of the world.”

“Thank you God, Mom, and Dad for being with me every step of the way.”

“‘While we were still sinners, Christ died for us.’ – Romans 5:8”

“Live by His word and not by this world.”

¹ Superintendent Farner has [publicly stated](#) that the district considers its graduation ceremony “to be no different than any classroom setting or other district event.” Your school board has a specific policy on School Visitors (PO 9150) which requires that “non-staff access to students and classes must be limited and only in accordance with a schedule determined by the Principal after consultation with the teacher whose classroom is being visited. Classroom visitations must be nonobtrusive to the educative process and learning environment and should not occur on an excessive basis.” Visitors under that policy are required to comply with your policy on Facility Security (PO 7440), which states that “[t]here will be times *during the instructional day* that members of the public, including parents, invited guests, or other individuals will for appropriate and legitimate reasons require entry into a school facility” (emphasis added) and specifically mentions that this applies during “regular school hours only.” It cannot be that the school board considers the graduation ceremony to be the same as a regular classroom setting. It is certainly a district event, but the graduation ceremony occurred during *non-instructional time*.

² “The ‘substantial disruption’ standard announced in *Tinker* requires ‘more than a mere desire to avoid the discomfort and unpleasantness that always accompany an unpopular viewpoint.’ An ‘undifferentiated fear or apprehension of disturbance is not enough to overcome the right to freedom of expression.” *N.J. by Jacob v. Sonnabend*, 37 F.4th 412, 423 (citing *Tinker* at 508, 509).

³ See *Arrowhead Graduation 2024*, YouTube (Arrowhead Streaming, June 1, 2024) available at <https://www.youtube.com/watch?v=VEJZBh4mx4I>; *Arrowhead Graduation 2025*, YouTube (Arrowhead Streaming, June 7, 2025) available at <https://www.youtube.com/watch?v=5DR MI-b2zc>.

“Thank you mom, dad, family, friends, and God!”

Yet in 2026, Ms. Beronja was prohibited from including either Proverbs 3:6 or the statement, “All thanks to God for being beside me through these last four years.” Our clients lack clarification about why religious expression was permissible for prior graduates but forbidden for Ms. Beronja.

The inconsistency is especially troubling given Superintendent Farner’s public statements suggesting that students simply failed to follow directions and that the District’s approach reflected settled legal requirements. The Constitution has not changed between 2024 and 2026. What changed was how the District treats religious speech.

The Constitution Does Not Permit School Districts to Engage in Viewpoint Discrimination.

The District has suggested that it was obligated to exclude religious content from graduation submissions. The U.S. Supreme Court has repeatedly rejected that view. In *Kennedy v. Bremerton School District*, 597 U.S. 507, the Court held that the Constitution does not require public schools to suppress private religious expression in order to avoid perceived Establishment Clause concerns. *Id.* at 534–535. On the contrary, the First Amendment protects religious expression no less than non-religious expression.

School officials may not impose rules on religious student speech and activities for being religiously motivated or reflecting a religious perspective. Yet that is precisely what occurred here. Ms. Beronja’s submissions were not rejected because they were vulgar, disruptive, threatening, or otherwise inappropriate. They were rejected because they expressed a religious viewpoint and reflected a religious perspective.

The First Amendment does not permit a public school to allow personal expression generally while excluding religious viewpoints specifically. The District’s restriction on Ms. Beronja’s message is not viewpoint neutral because it was “specifically directed at . . . religious practice.” *Kennedy*, 597 U.S. at 526.

The District’s apparent policy of excluding all political and religious comments within student expressions of gratitude singles out religious viewpoints for unfavorable treatment and raises serious constitutional concerns. Since District administration prohibited Ms. Beronja’s statement specifically because of its religious nature, this constitutes viewpoint discrimination, which the U.S. Supreme Court recently affirmed is an “egregious form of content discrimination” where First Amendment concerns are the most “blatant.” *See Chiles v. Salazar*, 146 S. Ct. 1010, 1024 (2026) (citing *Rosenberger v. Rector & Visitors of Univ. of Virginia*, 515 U.S. 819, 829 (1995)). The District’s actions are subject to the most demanding constitutional scrutiny and cannot be justified by speculative concerns about perceived endorsement.

Ms. Beronja’s Personal Expression on a Slide Was Not Tantamount to the District “Endorsing” Christianity.

To the extent the District silenced Ms. Beronja out of a hypothetical concern that her message might be perceived as the District “endorsing” Christianity, this rationale embraces an outdated understanding of Establishment Clause doctrine. The U.S. Supreme Court “long ago abandoned” the endorsement test for evaluating Establishment Clause claims, *Kennedy*, 597 U.S. at 510, and has since interpreted the clause “by reference to historical practices and understandings.” *Town of Greece v. Galloway*, 572 U.S. 565, 576 (2014) (citation omitted). Regardless, the policy cannot logically rely upon purported fear of religious coercion because a Bible verse displayed for a few seconds on a student slide cannot reasonably be understood to “make a religious observance compulsory,” *Zorach v. Clauson*, 343 U.S. 306, 314 (1952). Thus, “the school has no valid Establishment Clause interest.” *Good News Club*, 533 U.S. at 113.

Ms. Beronja’s message would not have transformed into government speech simply because it would have been delivered in a public school setting. *Rosenberger*, 515 U.S. at 830 (school may not refuse to fund student group’s newspaper because of religious perspective); *Lamb’s Chapel v. Ctr. Moriches Union Free Sch. Dist.*, 508 U.S. 384, 394 (1993) (school may not bar a Christian group from showing a film on school premises because of film’s religious perspective); *Bd. of Educ. of Westside Cmty. Schs. v. Mergens*, 496 U.S. 226, 250 (1990) (schools must allow private religious student groups on campus because “schools do not endorse everything they fail to censor”); *Adler v. Duval Cty. Sch. Bd.*, 250 F.3d 1330, 1331 (11th Cir. 2001) (neutral policy allowing student graduation speeches without censorship of religious content did not violate the Establishment Clause).

Further, an outright ban on Ms. Beronja’s religious expression is not narrowly tailored to avoid purported Establishment Clause concerns. Instead, the school could clarify that personal messages on graduation slides do not belong to the school and instead represent private speech by students in their individual capacity.

Courts have repeatedly recognized that students retain First Amendment protections at graduation ceremonies. In *Waln v. Dysart School District*, 54 F.4th 1152 (9th Cir. 2022), the Ninth Circuit held that a school district violated a student’s First Amendment rights when it prevented her from wearing a feather on her graduation cap because of its religious significance. The court explained that schools may not single out religious expression for unfavorable treatment and emphasized that viewpoint discrimination is impermissible regardless of the forum in which it occurs. *Id.* at 1164. The same principle applies here.

Open Records Request

Please also consider this letter a request for public records, made under Wisconsin's Open Records Law, Wis. Stats. §§ 19.31–19.39. This request seeks:

1. All documents and/or directives relied upon by District administration or staff in prohibiting religious content in graduation slideshow submissions for the 2024–25 and 2025–26 school years.
2. All communications, including but not limited to emails and text messages, sent or received by any administrator or staff member of the District, related to the prohibition of religious content in graduation slideshow submissions for the 2025–26 school year.

Please advise before processing this request if there will be a cost incurred. Wisconsin law requires that you respond to this request “as soon as practicable and without delay.” Wis. Stat. § 19.35(4)(a). If we can help clarify or refine this request, feel free to reach out.

Conclusion

Graduation marks the culmination of a student's educational journey. The Constitution does not permit a public school district to require students to conceal or abandon their religious viewpoints as the price of participating in that milestone.

Too often, we have seen well-meaning school officials thinking they are complying with the Establishment Clause mistakenly go too far and censor the private speech of students, violating students' First Amendment rights.

Regarding Mrs. Engel, parents possess a well-recognized liberty interest in directing the upbringing and education of their children. Mrs. Engel understandably wishes to know whether her younger daughter will be permitted to express her faith on equal terms with her peers when she reaches graduation.

We therefore request that the District take the following actions:

1. Confirm in writing that students retain the right to express religious viewpoints on the same terms as comparable non-religious viewpoints in graduation-related submissions and other student-expression opportunities;
2. Rescind any policy, directive, practice, or interpretation that prohibits student religious expression solely because it is religious in nature;
3. Require administrative officials for the District to undergo training in religious liberty and student speech; and,
4. Issue a public apology to Ms. Beronja and her family acknowledging that religious viewpoints are entitled to the same constitutional protections as

comparable non-religious viewpoints and committing that future students will not be subjected to similar discrimination.

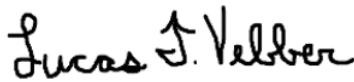
Our clients would prefer to resolve this matter cooperatively and without litigation. However, they are prepared to pursue all available legal remedies to defend their constitutional rights. Ms. Beronja is evaluating her legal options to address the violation of her rights, and Mrs. Engel is prepared to take appropriate action to ensure that future graduates—including her younger daughter—are not subjected to similar unconstitutional treatment.

We request a response by July 15, 2026.

Very Truly Yours,
WISCONSIN INSTITUTE FOR LAW & LIBERTY



Cory J. Brewer
Deputy Counsel



Lucas Vebber
Deputy Counsel



Rebecca Furdek
Deputy Counsel