# Exhibit A



### **New Club**

31 messages

Daniela Barca

Fri, Jul 26, 2019 at 2:08 PM

To: Barbara Hargraves

Mrs. Hargraves,

My name is Daniela Barca. I will be a freshman this school year and I am interested in starting a christian club. Would you be willing to be a supervisor? Please let me know before classes start.

Thank you,

Daniela

Barbara Hargraves <

Wed, Jul 31, 2019 at 9:32 AM

To: Daniela Barca <

Hello Daniela,

Wow, that is an exciting idea! I am certainly open to it. Can you email me some of your ideas or goals for the club? And I will look into getting the form or application that they request to get approval to start it. Awesome!

Barb Hargraves

[Quoted text hidden]

Barbara Hargraves Special Education Teacher Roy C. Ketcham High School

Barbara Hargraves < To: Daniela Barca <

Mon, Aug 5, 2019 at 11:32 AM

Just a quick follow up, Daniela. I received an application form to fill out. Let me know if I should go ahead and proceed! =)

[Quoted text hidden]

Daniela Barca <

Mon, Aug 5, 2019 at 6:58 PM

To: Barbara Hargraves

Yes please! Sorry I didn't reply right away. I want the club to have discussions about living for God in a godless society, and maybe end in prayer? I don't completely know how this is going to work out, but I know it might be a while before consistant members show up.

[Quoted text hidden]

Barbara Hargraves
To: Daniela Barca

Tue, Aug 6, 2019 at 10:31 AM

No worries! I understand! It may also be fun to reach out to students in small random ways. We have a Random Acts of Kindness Club that does things like that...Also, maybe be thinking about and praying about a name. Sometimes a single word or an anagram may work... You could always also wait til you get some kids together and come up with something. I will fill out the form and email you if I have any other questions on your thoughts.....Also, would you like to be at orientation as a club at the activities table? Let me know. If that doesn't work we can also just pick a day and start meeting in September.

[Quoted text hidden]

Barbara Hargraves To: Daniela Barca < Tue, Aug 6, 2019 at 10:39 AM

Update!

Just spoke with the school. I'll fill out the form tomorrow and we wait for it to be approved before we can sign up to go to orientation anyway. So stand by, and I'll keep you in the loop tomorrow regarding the form information.

Have a great day, Barb Hargraves

[Quoted text hidden]

To: Barbara Hargraves <

Daniela Barca <

Tue, Aug 6, 2019 at 11:07 AM

I think a table at orientation is a good idea. I've been considering making some flyers. See you at the pole is September 25 on a Wednesday. We might be able to squeeze in a meeting before then to let people know. Keep me posted.

[Ouoted text hidden]

Barbara Hargraves < To: Daniela Barca Wed, Aug 7, 2019 at 1:08 PM

https://www.christianitytoday.com/iyf/hottopics/witnessmissions/how-to-start-christian-club.html

reading this today, thought I'd pass it along

[Quoted text hidden]

Daniela Barca <

Wed, Aug 7, 2019 at 9:33 PM

To: Barbara Hargraves

Oh hey, I read this a while ago when I got the idea. It's nice to have the link on hand, thanks! [Ouoted text hidden]

Daniela Barca <

To: Barbara Hargraves

Thu, Aug 15, 2019 at 7:19 PM

Hello Mrs. Hargraves, have you heard anything from the school yet? Also, would you be able to get me a schedule of after school activity dates once the school year starts? I'm thinking of meetings starting twice a month, and I want to make sure we meet when nothing else is scheduled so NOTHING gets in the way. Also I'll be managing the girls swim team, so I'll have to make sure my activities don't conflict. Please keep praying!

[Quoted text hidden]

### Barbara Hargraves

Mon, Aug 19, 2019 at 7:31 AM

To: Daniela Barca <

I will check with Mrs. Seckler, Mr. Seipp's secretary, though I am not sure there is a calendar with all of the clubs/activities on them. It will probably mostly depend on when you and I can stay after, and which day I need to stay after for extra math help. Glad you're managing the swim team; you will be busy! I am praying for wisdom and guidance, and for responsive hearts in the students and favor from administration. =) I will let you know whenever I hear from the school!

[Quoted text hidden]

#### Daniela Barca <

Mon, Aug 19, 2019 at 9:09 AM

To: Barbara Hargraves

Thanks, I guess I'm just getting a little worried. Also, this organization called A21 is doing a walk to raise awareness about sex trafficking. I want to mention how to sign up at the first meeting. My church is doing it. You don't think it's too heavy, do you?

### **Barbara Hargraves**

Wed, Aug 21, 2019 at 2:37 PM

To: Daniela Barca <

No, I don't think so. When you introduce yourself and give/get input regarding what your meeting time will look like, that's one example of supporting an organization that makes a difference, giving people hope. You can also together come up with an idea that will affect the school climate for the better....That one word, hope, keeps coming to mind when I think about this. Everyone needs a source of hope in their lives.

[Quoted text hidden]

#### **Daniela Barca**

Thu, Aug 22, 2019 at 5:37 PM

To: Barbara Hargraves

I do think I have a small idea that could help the school. We could have an anonymous prayer request box, in the cafeteria or the main office, and if something is going on with someone they can ask for prayer. Also, what you said about hope...maybe God wants us to put it in the name. I'll have to keep praying and brainstorming.

#### Daniela Barca

To: Barbara Hargraves

Tue, Sep 3, 2019 at 4:41 PM

Mrs. Hargraves,

I know that since you work for the Ketcham you can only push the club so far. Do you think I should email my assistant principal, Mrs. Talaber? See you at the pole is September 25, and I need to arrange a meeting to bring it up before then. I want the club to be official as soon as possible.

[Quoted text hidden]

Barbara Hargraves
To: Daniela Barca <

Tue, Sep 3, 2019 at 6:56 PM

I think that's a very good idea. She will do whatever she can to support you. Please mention that you have me willing to be the supervisor. I mentioned it to her the day I went into the office to fill out the application. It was to Mr. Seipp, so she may forward your information to him, so he can respond to you, or me, or both of us!

[Quoted text hidden]

Barbara Hargraves
To: Daniela Barca

Thu, Sep 5, 2019 at 6:55 AM

Happy First Day! If you ever want to stop by my office is Room 285, and period 1 I teach next door in 287. I am free period 3 and 4, and have a study hall period 7 in room 239. After school I am either back in 285 or Room 232, where I teach period 2 and 5. I know this is a lot. If you have any questions about where to go come see me anytime!

Mrs. Hargraves Don't worry they don't mark freshmen late the first couple of days.

Barb [Quoted text hidden]

Daniela Barca

Thu, Sep 5, 2019 at 6:25 PM

To: Barbara Hargraves

Thanks. I emailed Mrs. Talaber today. You'll be receiving a carbon copy of the email. By the way, what do you do 6th period? That's when I have lunch.

[Quoted text hidden]

Barbara Hargraves
To: Daniela Barca

Fri, Sep 6, 2019 at 6:52 AM

Very nice email! I teach 6th period in Room 287. If you need me, please stop by; But I can't really talk.

Probably before or after school will be what works. Do you have a study hall?

[Quoted text hidden]

Daniela Barca

Fri, Sep 6, 2019 at 2:28 PM

To: Barbara Hargraves

No study hall, but I'll try to stop by some time soon! [Quoted text hidden]

Barbara Hargraves

To: Daniela Barca <

Tue, Sep 10, 2019 at 1:06 PM

Hello Daniela!

They found our form, and Mr. Seipp put a note wanting the name and the officers for the club. Let's get together asap and plan what you'd like to do. I believe it will just take a bit to get off the ground. It will be fine!

Tomorrow and Thursday, I have dr appts. unfortunately. Are you around before first period?? I am either in Room 285 or 287.

am either in Room 200 or

[Quoted text hidden]

Daniela Barca

Tue, Sep 10, 2019 at 2:28 PM

To: Barbara Hargraves

YEEEEEEEEE!

I'm so excited! I have a swim meet tomorrow afternoon, but I can see you in the morning if you give me a pass to gym. Don't forget, See you at the a Pole is September 25!

Barbara Hargraves

Tue, Sep 10, 2019 at 3:08 PM

To: Daniela Barca <

Perfect. See you in the morning!

[Quoted text hidden]

Daniela Barca

Tue, Sep 10, 2019 at 4:19 PM

To: Barbara Hargraves

By the way, I get dropped off at school at 7. What time should I meet you?

[Quoted text hidden]

**Barbara Hargraves** 

Wed, Sep 11, 2019 at 6:47 AM

To: Daniela Barca

As soon as they let you come up from the lobby is good

[Quoted text hidden]

Sun, Sep 15, 2019 at 7:07 PM

**Daniela Barca «**To: Barbara Hargraves •

Hi Mrs. Hargraves. Do you think I should email Mr. Seipp about the club, and tell him I'm acting president and that Leah is willing to be an officer? See You at the Pole is in ten days, and I want permission to advertise with flyers and have an explanatory meeting. I feel pressed for time.

[Quoted text hidden]

Barbara Hargraves

Mon, Sep 16, 2019 at 6:30 AM

To: Daniela Barca

Absolutely. I think he's expecting you to contact him when you had more information. He was also wanting a club name.

Keep me posted=) Have a great day. [Quoted text hidden] Sun, Oct 6, 2019 at 7:54 PM Daniela Barca < To: Barbara Hargraves Hi Mrs. Hargraves I know I haven't emailed in a while. I've had a few meetings and I'm not really sure where to go with the club from here. Could we meet soon so I can fill you in? [Quoted text hidden] Mon, Oct 7, 2019 at 6:31 AM Barbara Hargraves To: Daniela Barca before school today or tomorrow? [Quoted text hidden] Mon, Oct 7, 2019 at 6:39 AM Daniela Barca < To: Barbara Hargraves Can you do today?

Barbara Hargraves -To: Daniela Barca <

[Quoted text hidden]

yes [Quoted text hidden] Mon, Oct 7, 2019 at 6:50 AM

### Exhibit B



advice hot topics faith & life true-life stories fun

connect with us



home > hot topics > witness & missions



#### How to Start a Christian Club

If you want to start a Christian club at your public school, here are some suggestions:

by Mark Moring















M 4 Page 1 of 1 > M

Pray. This is the first step-and last, and every step in between-toward starting a club. Ask God to lead you, to pave the way, and to draw other students to the club.

Recruit. You can start a club alone, but it's better to have a small group of students to help. Actively seek the support of parents, youth leaders and at least one faculty member, though none of them can play a leadership role if the group meets on a public school campus.

Plan. Don't rush. Define a purpose for the club. Ask: Why do I want to do this? What are my goals? What will we do at meetings? Bible study? Sing? Pray? Socialize? Should we invite non-Christians to attend? When will we meet? Where? How often? How long will meetings last? Ask your youth leader, or another wise adult, to help in this process.

Observe. If possible, visit a Christian club at another school. Learn what works, and what doesn't. Ask that club's student leaders for advice.

Consult. Discuss your plans with your school principal. Ask if there are any school rules about clubs; you might need a "constitution" or mission statement. Be confident, but not combative. Your tone should be "when and where can we do this?" not "we're going to do this or else." At the same time, your tone should not be "may we do this?" because the law clearly says you can.

Know. Understand your legal rights. The Equal Access Act gives students the freedom to hold religious meetings on campus, as long as the group is student-led. (For more on Equal Access and your rights, see the Web sites below.)

Finance. Ask the adults you've recruited if they'll donate to the club's treasury. It'll cost some money to get the club started-fliers and posters to promote it, study materials for meetings, and, of course, munchies!

Promote. Get the word out-by word-of-mouth, fliers, posters, the P.A. system, by whatever means school policy allows. The Equal Access Act only applies to your right to meet, not to how you promote the club. You don't have a legal right to use school facilities - the P.A., bulletin boards, posters on walls to promote the club. That's dependent on school policy. If policy bans those avenues, you still have the right to hand out fliers promoting the club and, of course, to talk about it, though not during class. (If other non-official clubs are using school facilities for promotion, yours can too; school policy can't discriminate against yours because it's religious.) Finally, don't forget the goodies-juice and donuts, soda, and pizza.

Meet! Now it's time for your first meeting! Don't worry about having a 45-minute Bible study. Your first meeting should probably be more of a social event, where people get to know each other and discuss why they're there. Be willing to adjust your long-range plans to accommodate the wants and needs of the group. End the meeting by reading a Scripture passage and praying for one another.

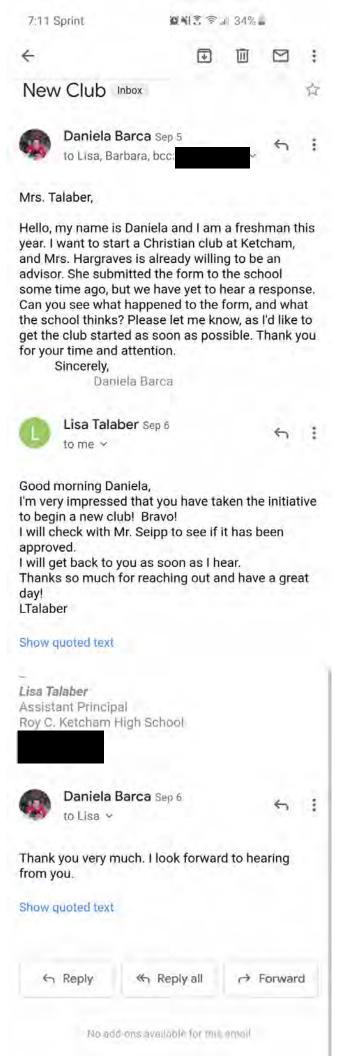
Press on. Your second meeting will likely be smaller than the first, but don't be discouraged. Some students may attend the first meeting just to check it out, then quit coming. Pray for them, and continue to meet and promote your club. Don't worry about numbers; these things usually start small. God isn't interested in the size of your group; he just wants your heart, your obedience and your faithfulness to







# Exhibit C



# Exhibit D



### **New Club**

13 messages

Daniela Barca <

Mon, Sep 16, 2019 at 12:08 PM

To: David Seipp Cc: Barbara Hargraves

Bcc:

Mr. Seipp,

My name is Daniela Barca. I want to start a club called OMG Christian Club (the name may change when more people attend) and you said we need some officers. I will be acting president for now, and Leah Biegun is willing to be an officer. Also, I would like permission to advertise the club and See You at the Pole, the day when students across the country gather at their school flagpoles to pray for their school. I desire permission to put up some flyers for the event. I would also like the event announced on the loudspeakers in the mornings. Please get back to me soon.

Daniela Barca

David Seipp

Mon, Sep 16, 2019 at 4:34 PM

To: Daniela Barca < Cc: Barbara Hargraves

Hi Daniela,

Thank you so much for your email. Please see me tomorrow when you get a chance to talk about the details in your email.

Thanks, Mr. Seipp

[Quoted text hidden]

**David Seipp** Principal

Roy C. Ketcham High School 99 Myers Corners Road Wappingers Falls, NY 12590

"The mission of the Wappingers Central School District is to empower all of our students with the competencies and confidence to challenge themselves, to pursue their passions, and to realize their potential while growing as responsible members of their community."

Daniela Barca - To: David Seipp	Mon, Sep 16, 2019 at 4:36 PM
Mr. Seipp, I have 6th period lunch tomorrow. Is that a convenient time [Quoted text hidden]	ent time for you?
David Seipp To: Daniela Barca	Mon, Sep 16, 2019 at 4:41 PM
Yes it is. [Quoted text hidden]	
Daniela Barca To: David Seipp Cc: Barbara Hargraves · Bcc:	Sun, Sep 22, 2019 at 7:18 PM
Mr. Seipp, When we spoke, you said that you needed to check in with do the club. Please, could you tell me who we need to cont. I'd really like to have permission to advertise See You at the soon as possible. Thank you, Daniela Barca	act to get the club up and running:
David Seipp To: Daniela Barca · Cc: Barbara Hargraves ·	Sun, Sep 22, 2019 at 9:06 PM
Please stop in and see me tomorrow when you are free.	
Thanks, Dave	
Sent from my iPhone [Quoted text hidden]	
Daniela Barca	Mon, Sep 23, 2019 at 7:06 AM
To: David Seipp	
Okay, I'll be there 6th period. [Quoted text hidden]	
David Seipp To: Daniela Barca	Mon, Sep 23, 2019 at 7:15 AM

**Barbara Hargraves** 

Tue, Sep 24, 2019 at 12:52 PM

To: Daniela Barca <

Any update Daniela? When is See You at the Pole? Tomorrow?

[Quoted text hidden]

Barbara Hargraves Special Education Teacher Roy C. Ketcham High School

Daniela Barca «

Tue, Sep 24, 2019 at 2:31 PM

To: Barbara Hargraves

Oh, yes, it's tomorrow. I'm in contact with a girl named Nancy who's been promoting it for 2 years. She's a junior. Also, I recently emailed the assistant superintendent. The Christian club apparently can't be done because it's religious. It is legally allowed though, so I emailed Mr. Lolkema a link that proves it. I think they're just worried about getting backlash about the club. So we've hit a roadblock, but God will make a way. Sorry for not keeping you posted. Keep praying!

[Quoted text hidden]

Barbara Hargraves

Tue, Sep 24, 2019 at 2:44 PM

To: Daniela Barca <

What time are you meeting at the pole?

[Quoted text hidden]

Barbara Hargraves « To: Daniela Barca < Tue, Sep 24, 2019 at 2:45 PM

Can you forward the link that you sent to Mr. Lokema?

[Quoted text hidden]

Daniela Barca <

Wed, Nov 6, 2019 at 6:45 PM

To:

[Quoted text hidden]



#### **Christian Club**

9 messages

**David Seipp** 

Wed, Sep 25, 2019 at 2:42 PM

To: Daniela Barca <

Hi Daniela,

Can you pleases stop by my office to follow up on our conversation.

Thanks, Mr. Seipp

David Seipp Principal

Roy C. Ketcham High School 99 Myers Corners Road Wappingers Falls, NY 12590

"The mission of the Wappingers Central School District is to empower all of our students with the competencies and confidence to challenge themselves, to pursue their passions, and to realize their potential while growing as responsible members of their community."

Daniela Barca

Wed, Sep 25, 2019 at 3:03 PM

To: David Seipp <

Sorry, I have a swim meet today. I can stop by 6 period tomorrow. [Quoted text hidden]

David Seipp ·
To: Daniela Barca ·

Wed, Sep 25, 2019 at 3:12 PM

Sounds good. Good luck in your meet today.

[Ouoted text hidden]

Daniela Barca

Mon, Oct 21, 2019 at 2:55 PM

# Exhibit E

**Group Name:** OMG

**Acting President:** Daniela Barca

Acting VP: Leah Biegun

**Mission Statement:** Our mission is to support each other in our faith and share hope and love with our community through service. (Formal Mission Statement to be written by group)

#### **Schoolwide Goals:**

- See You at the Pole: 9/25/19 We will pray for
  - School safety
  - O Increased kindness and compassion for each other
  - Hope for those hurting
  - Stronger community bonds
  - Wisdom and guidance for our administrators and teachers as they help us to be the best that we can be
- Prayer Locker: Anonymous place for students to place prayer requests
- Operation Christmas Child donations (small items, hygiene supplies, toys)

#### **Club-wide Goals**

• Bi-weekly meetings for student-initiated faith based support

### Community-wide Goals

- Food drives
- Clothing drives
- Operation Christmas Child
- Sparrow's Nest
- Monthly Charity

# Exhibit F

# Roy C. Ketcham High School



















C D F G I J K L M O P R S T Y

C

Crew Club

D

- Debate Club
- DECA

F

- FBLA (Future Business Leaders of America)
- Field Hockey
- Forensics & Debate Society

G

Greenworks Club

ı

Interact Club

J

- John Jay Hockey Club
- Junior Class Class of 2020

K

Ketcham Chronicles - School Newspaper

L	
•	Learning Center
M	
•	Masque & Mime Society
•	Math Team
0	
•	Odyssey Literary Magazine
Р	
•	Pride Club (GSA)
R	
•	RAK - Random Acts of Kindness
•	Renaissance Cards
•	Rotary Interact
S	
•	Science Olympiad
•	Senior Class - Class of 2020
•	Ski Club
Т	
•	Teen Club
Υ	
•	Yearbook (Portico)

The mission of the Wappingers Central School District is to empower all of our students with the competencies and confidence to challenge themselves, to pursue their passions, and to realize their potential while growing as responsible members of their community.

Site Map

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### Exhibit G



### **Christian Club**

4 messages

Mr. Lolkema:

My name is Daniela Barca and I am a freshman at Ketcham High School. I met with my principal, Mr. Seipp, for the second time earlier today. I would like to start a christian club but he told me that because the club has religious grounds the school cannot support it, nor can it be done on school property. I've done some research (you can look at the link below) and I believe that I am legally allowed to start this club.

I am a Christian. But sometimes it seems like I'm the only one. I want to start this club for other students like me so we can support each other in our beliefs. The school district celebrates diversity and the right to express who you are. All I want is to be allowed to express who I am. Everyone deserves as much. Please get back to me as soon as you can.

Daniela Barca

https://www.law.cornell.edu/uscode/text/20/4071

Daren Lolkema Mon, Sep 23, 2019 at 6:49 PM
To: Daniela Barca Cc: David Seipp <

Good Evening Ms. Barca

Thank you so much for your email and your advocacy for your cause. I will review your request with Mr. Seipp and provide you with a definitive answer by the end of the week.

Thank you once again.

Mr. Lolkema

[Quoted text hidden]

Thank you.

Daren Lolkema

Assistant Superintendent for Compliance and Information Systems Wappingers Central School District 25 Corporate Park Drive Hopewell Junction, NY 12533

Daniela Barca <

Tue, Sep 24, 2019 at 2:57 PM

Tue, Sep 24, 2019 at 4:23 PM

To: Barbara Hargraves

Fyi...here's the link and email.

[Quoted text hidden]

Daniela Barca

To: Barbara Hargraves

Also, See You at the Pole is at 7 AM

[Quoted text hidden]



### **Christian Club**

2 messages

Daniela Barca <

Mon, Oct 14, 2019 at 7:59 PM

To: Daren Lolkema Cc: David Seipp ·

Mr. Lolkema,

I have changed my club proposal after our email exchange. You will find it attached. Please tell me what you think.

Daniela Barca

**OMG** 

Daren Lolkema

Tue, Oct 15, 2019 at 4:15 PM

To: Daniela Barca Cc: David Seipp <

Thank you Ms. Barca for your continued interest and for your updated proposal. I will speak with Mr. Seipp about your request and either he or I will reply accordingly.

Have a wonderful evening.

- Mr. Lolkema

[Quoted text hidden]

Thank you.

Daren Lolkema Assistant Superintendent for Compliance and Information Systems Wappingers Central School District 25 Corporate Park Drive

Hopewell Junction, NY 12533

### Exhibit H

------ Forwarded message -----From: **US History** <
Date: Thu, Oct 3, 2019, 1:30 PM
Subject: Re: Christian Club
To: Daren Lolkema

Thank you for this clarification. I will have Daniela read your response where she can make appropriate changes that would not violate school policies but can still meet as an open club where it can have a positive impact on the students and the community.

Thank you again,

William Barca

On Thu, Oct 3, 2019 at 12:12 PM Daren Lolkema < www.wrote: Hi Mr. Barca

The way this request was presented to me was to have a new student club created at RCK for students to gather and talk about spreading the hope of Jesus. When high school clubs are formed we pay an adviser (a teacher who agrees to support the club) a stipend to help run and organize the student activities within the club. It is under this premise that we cannot support a club with such specific religious purpose (the fact that we are paying an employee as part of this process).

If you were to ask to have an open meeting after school and you wanted to use our school building from a facilities perspective to hold this meeting, and during this meeting you wanted to talk about spreading the hope of Jesus we would simply have you complete our facilities usage paperwork and that would be fine (so long as the meeting is open to the public).

A more specific example of a club we could consider would be one where the group discussed religions impact on culture and society. A theme like this is more generic, but we would have to advise that the club remain completely unbiased to any and all religions that could be discussed, you couldn't limit it to the Christian Faith.

I would be happy to speak to you and your daughter further if you wish. I do admire her advocacy on this idea and her resolve to pursue this further.

Thanks

Daren

On Thu, Oct 3, 2019 at 11:16 AM US History < wrote:

Hello Mr. Lolkema,

My Daughter Daniela Barca, has been told she can not start a Christian Club at Ketcham High School. The news articles below would disagree with your assessment. I would kindly ask that this request would be revisited and a decision made in accordance with the Equal Access Act of 1984.

Thank you,

William Barca

Thank you so much for your email and your advocacy for your cause. I will review your request with Mr. Seipp and provide you with a definitive answer by the end of the week.

Thank you once again.

Mr. Lolkema

On Mon, Sep 23, 2019 at 4:32 PM Daniela Barca < d wrote: Mr. Lolkema:

My name is Daniela Barca and I am a freshman at Ketcham High School. I met with my principal, Mr. Seipp, for the second time earlier today. I would like to start a christian club but he told me that because the club has religious grounds the school cannot support it, nor can it be done on school property. I've done some research (you can look at the link below) and I believe that I am legally allowed to start this club.

I am a Christian. But sometimes it seems like I'm the only one. I want to start this club for other students like me so we can support each other in our beliefs. The school district celebrates diversity and the right to express who you are. All I want is to be allowed to express who I am. Everyone deserves as much. Please get back to me as soon as you can.

Daniela Barca

https://www.law.cornell.edu/uscode/text/20/4071

\_\_

### Thank you.

Daren Lolkema
Assistant Superintendent for Compliance and Information Systems
Wappingers Central School District
25 Corporate Park Drive
Hopewell Junction, NY 12533

\_\_

Thank you.

Daren Lolkema
Assistant Superintendent for Compliance and Information Systems
Wappingers Central School District
25 Corporate Park Drive
Hopewell Junction, NY 12533