

**SENT VIA MAIL AND FAX  
(904) 992-2275**

October 5, 2011

Jeff Wier  
Chick-fil-A  
13672 Beach Blvd  
Jacksonville, FL 32224

Re: Discriminatory Discount

Dear Mr. Wier:

I am writing on behalf of a concerned Chick-fil-A customer and members of the Freedom From Religion Foundation (FFRF) to inform you of a serious civil rights concern with an Chick-fil-A promotion. FFRF is a nationwide nonprofit organization with over 16,600 supporters, including over 800 in Florida. Our purpose is to educate on nontheism and protect the constitutional principle of separation of church and state.

It is our information and understanding that your Chick-fil-A restaurant offers a promotion to those who bring in a bulletin on a Monday from the prior Sunday. Customers would then receive a free 8 nugget or Chick-fil-A sandwich with purchase of a side and drink. Enclosed, please find a picture of this promotion.

The Civil Rights Act states in relevant part, "All persons shall be entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation... without discrimination on the ground of race, color, religion, or national origin." 42 U.S.C. §2000a(a). As a place of "public accommodation," it is illegal for Chick-fil-A to discriminate, or show favoritism, on the basis of religion. *See* 42 U.S.C. §2000a(b)(defining a place of public accommodation as "any restaurant, cafeteria, lunchroom, lunch counter, soda fountain, or other facility principally engaged in selling food for consumption on the premises...")

Secondly, offering a special discount to individuals attending Christian worship service or other religious services violates state civil rights laws. Florida's Civil Rights Act states that "All persons shall be entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation, as defined in this chapter, without discrimination or segregation on the ground of race, color, national origin, sex, handicap, familial status, or religion." Fla. Stat. Ann. §760.08. The law covers "public accommodations" which are defined as "places of public accommodation, lodgings, facilities principally engaged in selling food for consumption on the premises, gasoline stations, places of exhibition or entertainment,

and other covered establishments.” Fla.Stat.Ann. §760.02. The practice of providing a discount to religious service attendees is a violation of this state law.

Chick-fil-A’s restrictive promotional practice favors religious customers and denies customers who do not attend church and nonbelievers the right to “full and equal” enjoyment of Chick-fil-A. Any promotions should be available to all customers regardless of religious preference or practice on a non-discriminatory basis.

We kindly urge you to see that these discriminatory discounts are put to a stop. Please notify us in writing about the steps you are taking to end this violation of federal and state laws so that we may inform our complainant. Thank you for your time and attention to this matter.

Sincerely,

Stephanie A. Schmitt  
Staff Attorney