

FREEDOM FROM RELIGION *foundation*

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

June 13, 2018

SENT VIA U.S. MAIL, EMAIL, AND FAX TO:
(214) 671-4636

Dallas Police Department
Open Records Unit
1400 S. Lamar
Dallas, TX 75215

Lieutenant Matt Williamson
Dallas Police Department Honor Guard
matthew.williamson@dpd.ci.dallas.tx.us

Re: Dallas PD partnership with church and *public records request*

Dear Lt. Williamson and To Whom It May Concern in the Open Records Unit:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) to alert the Dallas Police Department to constitutional concerns over its involvement in a religious event and to obtain public records. FFRF is a national nonprofit organization with more than 33,000 members across the country, including over 1,300 members in Texas. Our purposes are to protect the constitutional principle of separation between religion and government and church and to educate the public on matters relating to nontheism.

It is our understanding that the Dallas Police Department has partnered with First Baptist Dallas to provide the church with uniformed officers, possibly from the Dallas Police Honor Guard, for an event called "Freedom Sunday." We understand that this church service event is scheduled to take place on June 24 and will feature religious worship and Pastor Robert Jeffress claiming that "America is a Christian Nation."¹

We write to ensure that the Dallas Police Department is not using its resources to endorse a religious event or to entangle itself with the religious message of First Baptist Dallas.

The Dallas Police Department's apparent endorsement of this Freedom Sunday event poses constitutional concerns. The Establishment Clause of the First Amendment prohibits the government from endorsing a religious event. As the Supreme Court has put it, the Establishment Clause "mandates government neutrality between religion and religion, and between religion and nonreligion." *McCreary Cty., Ky. v. Am. Civil Liberties Union of Ky.*, 545 U.S. 844, 860 (2005); *Wallace v. Jaffree*, 472 U.S. 38, 53 (1985); *Epperson v. Ark.*, 393 U.S. 97, 104 (1968); *Everson v. Bd. of Educ. of Ewing*, 330 U.S. 1, 15-16 (1947). By providing uniformed officers to participate in this event, the department creates the appearance that it endorses the event and its exclusively religious, exclusively Christian message.

As you are aware, citizens interact with and rely on law enforcement officers during some of the most urgent and vulnerable times of their lives. Minority religious and nonreligious citizens should not be made to feel excluded, like outsiders in their own community,

¹ An advertisement for the event, which appears to include uniformed members of the Dallas Police Department Honor Guard, can be viewed at <http://freedomatfirstdallas.org/>. Please also see the enclosed image.

because the city police department they support with their taxes oversteps its power by endorsing, and participating in, a Christian worship service. Nor should the department suggest that it favors Christian citizens. We hope you'll agree that law enforcement must be even-handed and avoid any appearance of bias toward some citizens, or hostility toward others.

While individual officers are certainly free to participate in any event they wish while acting in their personal capacities, the department may not endorse a religious event by approving the direct participation of uniformed officers. The Freedom Sunday event is explicitly designed to exclude the 24% of Americans who are nonreligious and, more broadly, the 30% of Americans who are non-Christian,² by perpetuating the myth that American is a "Christian nation." Any event designed to marginalize 30% of Americans, including the 47% of millennials and younger Americans who are non-Christian,³ is not an event worthy of the Dallas Police Department's seal of approval.

We ask that the department drop its support for this divisive, evangelistic vision for America and decline to participate in the Freedom Sunday worship service. Please inform us in writing of the steps taken to respect the right of conscience of all Dallas residents and to send a message that is inclusive of the minority religious and nonreligious citizens in your community.

Public Records Request

In order to gain a better understanding of the nature of the Dallas Police Department's involvement with the Freedom Sunday events, past and present, we are seeking records that clarify the arrangement. Pursuant to the Texas Public Information Act (Tex. Gov't Code Ann. §§ 552.001– 552.353), I request a copy of all records related to the Dallas Police Department's involvement with the Freedom Sunday event described above, and similar Freedom Sunday events, including the following records, from January 2016 to present:

- 1) All Dallas Police Department policies concerning appearances by the Honor Guard or other uniformed officers at private events;
- 2) All internal and external communications (including but not limited to email) from a representative of the Dallas Police Department regarding any Freedom Sunday event; and
- 3) All communications (including but not limited to emails, applications, and records of payment) to any Dallas Police Department representative regarding any Freedom Sunday event.

Per § 552.221(d), I request these copies as soon as possible, without delay. If you choose to deny the request, please respond in writing and state the statutory exception authorizing the withholding of all or part of the public record and the name and title or position of the person responsible for the denial. If your agency does not maintain these public records,

² Robert P. Jones & Daniel Cox, *America's Changing Religious Identity*, PUBLIC RELIGION RESEARCH INSTITUTE (Sept. 6, 2017), available at www.prrri.org/wp-content/uploads/2017/09/PRRI-Religion-Report.pdf.

³ *Id.*

please let me know the proper custodians of these records. Please provide their names and addresses.

If any of these records are available through electronic media, they may be e-mailed to sgrover@ffrf.org. If I can provide any clarification that will help expedite your attention to my request, please contact me at (608) 256-8900. Thank you for your attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sam Grover', with a long horizontal line extending to the right.

Sam Grover
Associate Counsel

STG:ces

Enclosure



CELEBRATE WITH US
SUNDAY, JUNE 24

9:15 & 10:50 AM

[PLAN YOUR VISIT](#)