

# FREEDOM FROM RELIGION *foundation*

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

March 24, 2017

**SENT VIA EMAIL AND U.S. MAIL:**

**Bryan.Roach@indy.gov**

Bryan Roach  
Chief of Police  
Indianapolis Metropolitan Police Dept.  
50 North Alabama Street  
Indianapolis, IN 46204

Re: Religious promotion in government email

Dear Police Chief Roach:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) to alert you to constitutional concerns regarding the use of government email to promote religion. FFRF is a national nonprofit organization with more than 27,000 members across the country, including more than 400 members in Indiana. FFRF's purpose is to protect the constitutional principle of separation between state and church.

A concerned local resident informed us that you sent an email to non-police employees of the City of Indianapolis on March 15, 2017 promoting an event at IPS School 54. The email concluded with:

Finally, I like to end with scripture as encouragement and guidance. [1] Thessalonians Chapter 5, verses 14 and 15: "Now we exhort you, brethren, warn them that are unruly, comfort the feebleminded, support the weak, be patient toward all men. See that none render evil for evil unto any man; but ever follow that which is good, both among yourselves, and to all men."

It is inappropriate to use an official government email to promote a particular religious text as a source of guidance. Emails sent from your government email address are attributable to the IMPD, which may not endorse the New Testament. We request assurances that future emails from your official government email address will not include bible verses or otherwise promote religion.

The chapter you chose is particularly inappropriate since 1 Thessalonians Chapter 5 is directed only to believers, which 5:14 refers to as "brethren," in contrast to non-Christians who are described as people "of darkness," destined to

“sudden destruction” and “wrath.”<sup>1</sup> The same chapter also includes an instruction to “pray without ceasing” to the Christian god.<sup>2</sup> Besides promoting Christianity, the chapter is actually highly exclusionary, despite the first blush impression of phrases such as “be patient toward all men.”

The Establishment Clause of the First Amendment prohibits government sponsorship of religious messages. The Supreme Court has said time and again that the “First Amendment mandates government neutrality between religion and religion, and between religion and nonreligion.” *McCreary Cnty., 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. Arkansas*, 393 U.S. 97, 104 (1968); *Everson v. Bd. of Educ. of Ewing*, 330 U.S. 1, 15–16 (1947). This principle is violated when a government employee promotes religious messages on the government’s behalf.

It is inappropriate and unconstitutional for the IMPD or its agents to promote a religious message because it conveys government preference for religion over nonreligion and, in this case, for Christianity over other religions. The Supreme Court has ruled, “[t]he Establishment Clause, at the very least, prohibits government from appearing to take a position on questions of religious belief.” *Cnty. of Allegheny v. Am. Civil Liberties Union Greater Pittsburgh Chapter*, 492 U.S. 573, 593–94 (1989).

The 23% of American adults who are nonreligious, including 35% of millennials,<sup>3</sup> should not be made to feel excluded, like “outsiders, not full members of the political community,” *McCreary*, 545 U.S. at 860 (citations omitted), because the IMPD Police Chief encourages others to seek encouragement and guidance by a sectarian religious text while speaking on behalf of the IMPD. Religion is a divisive force and there is no reason to entangle it with official IMPD business.

We request written assurances that future emails sent from your official government email address will not promote religion so that we may notify our complainant that this issue has been resolved. Thank you for your time and attention to this important matter.

Sincerely,



Ryan D. Jayne, Esq.  
*Elaine & Eric Stone Legal Fellow*  
*Freedom From Religion Foundation*

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<sup>1</sup> 1 Thess. 5:3, 5:5, and 5:9.

<sup>2</sup> 1 Thess. 5:17–18.

<sup>3</sup> *America’s Changing Religious Landscape*, PEW RESEARCH CENTER (May 12, 2015), available at [www.pewforum.org/2015/05/12/americas-changing-religious-landscape/](http://www.pewforum.org/2015/05/12/americas-changing-religious-landscape/).